HARROW LOCAL PLAN 2021-2041

EXAMINATION IN PUBLIC

SCHEDULE OF PROPOSED MODIFICATONS FOLLOWING HEARING SESSIONS

NOVEMBER 2025

Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Chapter 0 – Introduction

<table>
<tr><th>Ref</th><th>Chapter /page/policy number</th><th>Modification</th><th>Reason for Modification</th></tr>
<tr><td><u>MM1</u></td><td>0.0.30 p10</td><td>0.0.30 The Local Plan is organised as follows within this document:

(a) Introductory Chapter (Chapter 01): Context and the spatial strategy: provides background information on the Local Plan (including Borough Profile) before setting out the Vision for Harrow and the plan's strategic / spatial objectives. It also establishes the 'spatial strategy' for the Borough, the land-use priorities and overall pattern of development that the plan will seek to deliver.
(b) Thematic policy chapters (Chapters 02-10): these cover the policy areas that seek to deliver the spatial vision, objectives and strategy of the Local Plan, and contribute to the overarching objective of sustainable development (consistent with the NPPF and the London Plan's 'Good Growth' objectives). Each chapter includes at least one overarching strategic policy and a series of detailed <u>(non-strategic)</u> policies. These chapters represent the development management policies that all planning applications will need to comply with. <u>The table below sets out the Strategic Policies and Development Management (non-strategic) Policies.</u>
(c) Site Allocations chapter (Chapter 11): this sets out the site allocations for a range of uses, including housing, employment, commercial and community uses, that are necessary to deliver the strategic priorities of the area set out in this Plan. Each site allocation includes a site plan and schedule setting out type and mix of development proposed over defined periods of the plan period, together with specific site constraints and considerations. <u>The site allocations are Strategic Policies.</u>
(d) Appendices: covering glossary, delivery and monitoring framework (will include implementation framework for the Local Plan, as well as the arrangements for monitoring and outcomes over the plan period), protected views, town centres hierarchy, and details of policies the new Local Plan will supersede / replace. Proposed changes to the Policies Map are published as a separate Atlas of Change.
<table>
<tr><th colspan="3"><u>Thematic Policies</u></th></tr>
<tr><th><u>Chapter</u></th><th><u>Strategic Policy</u></th><th><u>Development Management Policy (non-strategic policies)</u></th></tr>
<tr><td><u>2</u></td><td><u>SP01</u></td><td><u>GR1, GR2, GR3, GR4, GR3A, GR3B, GR4, GR4A, GR5, GR7, GR8, GR9, GR10, GR11, GR12</u></td></tr>
<tr><td><u>3</u></td><td><u>SP02</u></td><td><u>HE1, HE2</u></td></tr>
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<tr><td><u>10</u></td><td><u>SP10</u></td><td><u>M1, M2, M3</u></td></tr>
<tr><td><u>Chapter</u></td><td colspan="2"><u>Detailed Site Allocations (Strategic Policies)</u></td></tr>
<tr><td><u>11</u></td><td colspan="2"><u>OA1, OA2, OA3, OA4, OA5, OA6, OA7, OA8, OA9, OA10, OA11, OA12, OA13, OA14, OA15, OA16, OA17, GB1, GB2, O1, O2, O3, O4, O5, O6, O7, O8, O9, O10, O11, O12, O13, O14, O15, O16, O17, O18, O20, O21, O22</u></td></tr>
</table></td><td>To ensure compliance with paragraph 21 of the Framework requires plans to make explicit which are strategic policies.</td></tr>
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Chapter 1 – Borough Profile, Spatial Vision, Strategic Objectives and Spatial Strategy

Ref	Chapter /page/policy number	Modification	Reason for Modification
MM2	Strategic Objectives pp23-25 Para 1.1.7	1.1.7 The following Borough-wide strategic objectives provide the link between Harrow's spatial vision and the strategy for delivery set out in the policies in this Plan. ~~throughout the rest of this document~~. They reflect the Council's Corporate Plan and other relevant strategies. Our Local Identity • Retain, reinvigorate and reinforce the local distinctive character of Harrow's communities by ensuring new development responds positively to the special attributes of its local context. • Respecting the cultural, historic, built and natural environments and the need for their integrated management. • Ensuring new development is designed, constructed and maintained to a high standard. • Conserve and enhance the historic and cultural environment, promoting understanding and appreciation of it. Working with stakeholders to sustain the value of local heritage assets including the international value of Harrow School. 1.1.8 Harrow's identified heritage assets and historic environment will continue to be valued, conserved, enhanced and celebrated. 1.1.9 The significance of Harrow's historic environment and its constituent heritage assets, will continue to be valued, conserved, enhanced and celebrated. Specific conservation and enhancement measures identified within Harrow's Conservation Area Appraisals and Management Strategies (CAAMS) and SPDs will be carried out as opportunities arise. 1.1.10 Development in Harrow will achieve a high standard of development that respects the distinctive character and context of the borough by adopting a design-led approach and the good growth principles contained in the London Plan. **Infrastructure** • Harrow's infrastructure will continue to meet current and future demand through high quality and timely provision. Development contributions will be used to ensure that the community continue to enjoy access to all forms of social and physical infrastructure, including education, health care, recreation and cultural facilities. 1.1.11 Development will contribute to the improvement of infrastructure by paying the borough's Community Infrastructure Levy. Over the plan period, this will create opportunities to fund significant local infrastructure improvements that benefit Harrow's diverse community, as well as smaller neighbourhood-level improvements. 1.1.12 Existing infrastructure will be protected and new infrastructure provided where necessary to meet the needs of the borough. 1.1.13 New developments have will deliver infrastructure on-site where it is needed. Ground floor space within mixed use development have scope to deliver new services within them, and where appropriate improved connections will be delivered within developments. 1.1.14 The Harrow and Wealdstone Opportunity Area, the borough's largest service centre, will benefit from increased connectivity with other parts of the borough, and beyond through sustainable transport linkages. **Transport** • Sustainable transport infrastructure will be delivered to ensure there are healthy and safe alternatives to private vehicles. The council will facilitate modal shift away from fossil fuel car use. 1.1.15 New development will be designed to support future occupants to move around by sustainable travel modes. Walking and cycling infrastructure will be embedded into new development, which will be well connected to local services to support journeys being made on foot or by bicycle.	Table with Strategic Objectives and policy box with Spatial Strategy deleted. Strategic Objectives have been set out individually, with links to the issues addressed / strategy within the Plan that will achieve the objectives. The reason for this is to link the Spatial Vision (unmodified) with the relevant elements of the spatial strategy included below each objective to reflect how the plan / spatial approach will deliver those (reformatted). This re-ordering is to reflect the framework, and make the plan more effective.

Ref	Chapter /page/policy number	Modification	Reason for Modification
		1.1.16 Existing sustainable transport infrastructure will be protected and enhanced, and were feasible new infrastructure will be provided to extend sustainable travel choice. This will include improving pedestrian connectivity and wayfinding between Harrow town centre and Harrow-on-the-Hill will increase legibility in both locations. **Air quality** • Air quality improvements will continue to be made through high quality design, spatial planning and sustainable infrastructure improvements. 1.1.17 By bringing forward new developments in close proximity to public transport, and through improvements to pedestrian and cycling infrastructure, the plan will support residents to become less car dependant. 1.1.18 Managed parking standards in new developments, and improvements to electric vehicle charging infrastructure will further support a reduction in journeys carried out by fossil fuel vehicles. **Open Space** • The quality of existing open space will be improved, and new open space provision will be facilitated. Public access to open space will be increased. 1.1.19 The Borough's Metropolitan Open Land, Green Belt and other open space will be maintained and enhanced as an interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. Access to green infrastructure will be enhanced. 1.1.20 The quality and accessibility of open space will be maintained, and better provision for children's and teenagers' accessible recreation and play space will have been made. **Biodiversity** • The borough's biodiversity will be protected and enhanced, with greenbelt and MOL land becoming a thriving example of biodiversity uplift. 1.1.21 New development will be biodiversity-positive, as biodiversity net gain and urban greening principals are embedded into new developments. Additionally, the borough's stock of biodiversity will be increased through the delivery of off-site biodiversity improvements. **Climate Emergency** • Harrow will reduce its contribution to climate change through facilitating net zero development where possible, minimising our reliance on fossil fuels, promoting retrofitting and energy efficiency, and utilising sustainable design methods and reducing flood risk. Harrow will improve its resilience to climate change through mitigation and adaptation. 1.1.22 The high-quality net zero carbon design of new development will contribute to local distinctiveness, creating clean, green and healthy spaces that foster community pride, whilst also delivering on the council's climate and nature objectives. **Waste and Recycling** • Harrow will continue to minimise waste and increase recycling rates in line with circular economy principles. 1.1.23 New development will be designed to ensure that it is built in a way that minimised waste during the construction phase. Operationally, new developments will be designed to facilitate reuse and recycling. **Housing** • Harrow will facilitate the delivery of new housing from a range of sources to meet the diverse range of housing needs of a growing population and demographic changes. This will be located within the most sustainable locations of the Borough such as the opportunity area, town centres and sustainable locations to protect, enhance and positively evolve the character of the suburbs.	

Ref	Chapter /page/policy number	Modification	Reason for Modification
		1.1.24 Between 2021-41, new development and economic growth will provide a minimum 16,040 (net) new low-carbon homes across the borough. 1.1.25 Comprehensive and coordinated regeneration activity will continue to positively transform the Harrow & Wealdstone Opportunity Area, delivering a minimum of 8,300 additional new homes 1.1.26 The leafy, suburban character of the Borough's residential Metroland areas, outside sustainable locations, will have been safeguarded as areas of low density, family housing. 1.1.27 Optimising development opportunities on sites across the Borough will provide high quality housing to suit the needs of a range of residents, while respecting the character of the area. 1.1.28 Existing housing stock makes a significant contribution to meeting local housing need. The plan seeks to provide opportunities to deliver new stock while managing existing stock to ensure that residents have suitable housing choices across their lifespan. This includes providing new homes for all stages of the life cycle, allowing residents to increase or decrease the size of unit based on their current needs. **Affordable Housing** • Maximise delivery of genuinely affordable housing to meet the needs of residents. 1.1.29 Affordability of housing in Harrow, and London is a significant challenge. The plan ensures that the London Plan's affordable housing target applies to development within the borough, to boost the availability of genuinely affordable housing. 1.1.30 There are a range of affordable housing typologies and tenures being delivered locally. This plan seeks to balance those that most closely meet local needs, while ensuring that overall delivery of new housing is not compromised. **Mixed and Inclusive Communities** • Promote inclusive, mixed sustainable communities, through ensuring high standards in new housing and opportunities to build social interaction, to create cohesive, healthy communities enabling the older population to remain independent and active for longer, as well as providing specialised housing options to meet the needs of vulnerable residents. 1.1.31 Harrow is one of the most diverse places in the UK. It is crucial that new development helps to deliver new homes that are capable of meeting the needs of all residents. 1.1.32 New homes will be focused within sustainable locations, where there is a choice of ways of getting around, and where there is easy access to shops, services, and employment opportunities. 1.1.33 Older persons' housing is increasingly important, reflecting the age of the local population. Homes will be adaptable, and some will be accessible to ensure people are able to live in their home for longer. 1.1.34 It is important that all communities are considered when planning for housing need. The plan contains sites suitable for self-build and custom-build housing, as well as providing for larger households and communities with particular housing typologies such as gypsies and travellers. **Housing Types** • Promote a range of well-designed and accessible housing types and sizes, to cater for the needs of an ageing population, younger households with children, and multigenerational families. 1.1.35 There is a significant housing need for a range of types of housing across the borough. In particular there is a need to increase the stock of family-sized homes. The policies in this Plan seek to balance meeting this need as fully as possible,	

Ref	Chapter /page/policy number	Modification	Reason for Modification
		while ensuring that the overall supply of housing continues to be delivered. This will include ensuring that the borough's existing stock of family sized housing is not eroded. 1.1.36 There is also a need to provide housing that meets the evolving needs of the existing population. This will be achieved by making all homes adaptable, as well as supporting the delivery of wheelchair accessible homes in new developments. 1.1.37 There is an emerging market for a range of flatted typologies, including build to rent, student housing, and large-scale purpose built shared living, and the policies in this plan seek to balance this demand against meeting the needs within the borough for family-sized, and affordable housing. **Local Economy** • Harrow will continue to play an important role in the wider London economy, including cultural, creative and digital industries. • Employment opportunities will be retained and promoted in appropriate employment locations. 1.1.38 Harrow has a modest employment sector compared to other London boroughs, reflecting its history as part of Metroland, providing homes for Londoners. This plan seeks to safeguard existing employment levels, and increase opportunities for local employment by providing a minimum of 35,845m^2 of non-residential floorspace with the potential to create over 1,750 new jobs across the borough. Non-residential floorspace will be delivered primarily by way of site allocations, which will create 25,360m^2 of new non-residential floorspace within the Harrow & Wealdstone Opportunity Area, and 10,485m^2 across the remainder of the borough. 1.1.39 1,268 new jobs will be delivered within the Harrow and Wealdstone Opportunity Area. These will predominantly be in the retail and services sectors, but will also support the evening and night-time economies. 1.1.40 A sufficient supply of industrial land will be provided and maintained to meet current and future needs. This will be delivered through the intensification of the borough's industrial assets, and through supporting appropriate employment uses into town, district, and local centres. **Town Centres** • Town centres (including Metropolitan, District and Local centres) will continue to be attractive, vibrant hubs for investment containing appropriate town centre uses, including thriving evening and night-time economies. 1.1.41 Development in Harrow will maintain or increase the local market share of retail expenditure, in order to secure the vitality and viability of the Borough's town centre network and meet local needs. 1.1.42 Harrow town centre will continue to be a vibrant and attractive Metropolitan Centre having benefited from additional arts, leisure, and culture facilities. Adaptable mixed-use and residential development will ensure that there is continued vibrancy in the centre. Employment uses will be bolstered attracting and retaining an array of adaptable businesses and workers to the area. The centre will be the primary location for central public services ensuring high-quality services and facilities are accessible to all. 1.1.43 Wealdstone will strive to become a vibrant centre, with its own distinctive identity. The centre will be a vibrant hub supported by local residents and a strong business community, whose presence has been transformed by the intensification of employment and carefully managed redevelopment of surrounding industrial estates. 1.1.44 The Station Road corridor will have benefited from redevelopment and environmental improvement linking the Wealdstone and Harrow town centres together.	

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		1.1.45 Harrow-on-the-Hill station and surrounding area will benefit from a comprehensive redevelopment providing a new focal point for the Harrow Town Centre comprising retail, leisure, office and residential uses. This redevelopment will have contributed to a vibrant new character achieving high standards of sustainability, public realm and residential quality. 1.1.46 The borough's other town centres will provide local services to support local shopping and services, as well as supporting economic growth. Development opportunities commensurate to their character, role, and function will support their ongoing evolution, in particular where new homes can help to support the ongoing vitality of centres. Local parades will be supported to become thriving local hubs providing a range of local services for residents.	
MM3	Strategic Objectives pp 25-27 Para 1.1.8 and 1.1.9	~~1.1.47 The Spatial Strategy essentially seeks to relate the spatial vision and strategic objectives to areas and localities within the borough and quantify the level of development anticipated in each part of the borough.~~ 1.1.48 The Key Diagram below ~~Spatial Strategy is accompanied by a map~~ depicts~~ing~~ the strategy ~~graphically~~ spatially.	To make clear that the (formerly) spatial strategy map is a key diagram, thereby ensuring it is in conformity with the Framework.
MM4		~~Spatial Strategy:~~ ~~By 2041, new development and economic growth will provide a minimum 16,040 (net) new low-carbon homes, create over 1,000 additional new jobs and fund significant local infrastructure improvements that benefit Harrow's diverse community.~~ ~~The high-quality carbon neutral design of new development will contribute to local distinctiveness, creating clean, green and healthy spaces that foster community pride, whilst also delivering on the council's climate and nature objectives.~~ ~~Comprehensive and coordinated regeneration activity will continue to positively transform the Harrow & Wealdstone Opportunity Area, delivering a minimum of 8,750 additional new homes, and 1,000 additional new jobs.~~ ~~Harrow town centre will continue to be a vibrant and attractive Metropolitan Centre having benefited from additional arts, leisure, and culture facilities. Adaptable mixed-use and residential development will ensure that there is continued vibrancy in the centre. Employment uses will be bolstered attracting and retaining an array of adaptable businesses and workers to the area. The centre will be the primary location for central public services ensuring high-quality services and facilities are accessible to all. The town centre will benefit from increased connectivity with other parts of the borough, and beyond through sustainable transport linkages.~~ ~~Wealdstone will strive to become a vibrant centre, with its own distinctive identity. The centre will be a vibrant hub supported by local residents and a strong business community, whose presence has been transformed by the intensification of employment and carefully managed redevelopment of surrounding industrial estates.~~ ~~The Station Road corridor will have benefited from redevelopment and environmental improvement linking the Wealdstone and Harrow town centres together.~~ ~~Harrow-on-the-Hill Station, Harrow Bus Station and Harrow & Wealdstone Station will be accessible major public transport nodes with step free access. Harrow-on-the-Hill station and surrounding area will benefit from a comprehensive redevelopment providing a new focal point for the Harrow Town Centre comprising retail, leisure, office and residential uses. This redevelopment will have contributed to a vibrant new character achieving high standards of sustainability, public realm and residential quality.~~ ~~Improved pedestrian connectivity and wayfinding between Harrow town centre and Harrow-on-the-Hill will increase legibility in both locations.~~ ~~The borough's other town centres will accommodate development opportunities commensurate to their character, role, and function.~~	Spatial Strategy deleted as relevant sections inserted under the associated Spatial Objectives above. The reason for this is to link the Spatial Vision (unmodified) with the relevant elements of the spatial strategy included below each objective to reflect how the plan / spatial approach will deliver those (reformatted). This re-ordering is to reflect the framework, and make the plan more effective.

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		~~The Borough's Metropolitan Open Land, Green Belt and other open space will be maintained and enhanced as an interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. Access to green infrastructure will be enhanced.~~ ~~The quality and accessibility of open space will be maintained, and better provision for children's and teenagers' accessible recreation and play space will have been made.~~ ~~Harrow's identified heritage assets and historic environment will continue to be valued, conserved, enhanced and celebrated. Areas of special character and architectural significance will be protected. The significance of Harrow's historic environment and its constituent heritage assets, will continue to be valued, conserved, enhanced and celebrated. Specific conservation and enhancement measures identified within Harrow's Conservation Area Appraisals and Management Strategies (CAAMS) and SPDs will be carried out as opportunities arise.~~ ~~North Harrow District Centre will be restored as a vibrant local shopping and service centre meeting the needs of residents and supporting local business.~~ ~~The vitality and character of Pinner High Street will have been conserved and enhanced.~~ ~~In Stanmore, mixed use retail and residential development will have strengthened its function as a District Centre, access to natural green space will be maintained and accessible to residents and visitors.~~ ~~Partnership working with the neighbouring boroughs of Barnet and Brent will have secured co-ordinated public realm enhancements to Edgware, Burnt Oak, Kingsbury and Kenton centres, and will have provided improved pedestrian and cycle connectivity between Kenton Station and Northwick Park Station.~~ ~~Appropriate development will occur on small, brownfield sites in sustainable locations close to town centres, and train and underground stations.~~ ~~The leafy, suburban character of the Borough's residential Metroland areas, outside sustainable locations, will have been safeguarded as areas of low density, family housing.~~ ~~Optimising development opportunities on sites across the Borough will provide high quality housing to suit the needs of a range of residents, while respecting the appearance of residential character areas.~~ ~~Employment land will be directed to appropriate locations remaining flexible and adaptable to meet current and future needs. A sufficient supply of industrial land will be provided and maintained to meet current and future needs.~~ ~~Harrow will maintain or increase its market share of retail expenditure to secure the vitality and viability of the Borough's town centre network and meet local needs~~	

Chapter 2 – High Quality Growth Chapter 2: High Quality Growth

Ref	Page/policy/ para	Modification	Reason for Modification
MM5	Policy SP01 up to para 2.0.10 pp30-33	**Strategic Policy 01: High Quality Growth** Development in Harrow must be of a high quality to ensure proposals relate well to the existing character of the Borough, whilst ensuring new development makes effective use of land and provides necessary uses for Harrow residents and promotes the creation of healthy and sustainable places. The Council will work with strategic partners in conjunction with the Infrastructure Delivery Plan to identify essential infrastructure to support growth. a. Harrow has a range of unique character areas. The Harrow & Wealdstone Opportunity Area can accommodate growth and higher density development due to its existing character, whilst the smaller centres and the strong suburban Metroland character areas are much more sensitive to change. The Council will support design-led developments which respond positively to the character and context of the location within which they are proposed. By following a design-led approach, development will make optimal use of land in accordance with the requirements of the development plan. The Council will support contemporary architecture where appropriate, providing it does not harm or detract from an existing context or architectural character. This is particularly important in relation to heritage assets across the borough. b. New development and growth will predominantly be directed into the Harrow & Wealdstone Opportunity Area. New development within the Opportunity Area will by its nature be more intensive than elsewhere in the borough, due to the character of the area and its proximity to public transport and infrastructure. The Opportunity Area contains the two town centres of Harrow (Metropolitan) and Wealdstone (District). The design of development and uses in these areas must be appropriate, improving the vitality and vibrancy of the centres and ensuring development remains at a human scale. c. As set out in the London Plan (2021) tall buildings can play a role in the delivery of growth within the borough, particularly to assist in meeting the required housing target. The Council will support appropriate tall building developments that are located within designated tall building zones, and are of a high-quality design, appropriate height, and that provide for a mix of homes or employment opportunities for Harrow residents. Proposals should demonstrate compliance with Policy GR4 (Tall Buildings) of the Local Plan. d. Suburban Harrow has a strong character predominantly made up of 2 to 3 storey properties. Whilst it is acknowledged that character will evolve over time, new development within the suburban areas must respond positively to the existing character, ensuring that the Metroland and Village characteristics are respected and retained. Larger scale development opportunities may arise within the suburban area, but must respect the suburban context, and tie in satisfactorily to the wider character context and fabric. e. ~~Across the Borough there are areas of special character, which provide strategic landscapes and distinctiveness to the Borough. The Council will manage development within these locations to ensure that they are not harmed.~~ f. The Council will allocate appropriate sites and set out design parameters to assist applicants in understanding the intended minimum development capacity to ensure a site is fully optimised whilst respecting the character of the area it is located in. g. Development proposals should demonstrate a level of effective public engagement commensurate to the scale of development. h. The design of new development must consider wider policy objectives as set out within the development plan. **Supporting Text:** 2.0.1 Land is a finite resource and therefore development must optimise land to ensure that the spatial strategy is achieved. To meet the ambitious targets set by the London Plan and local evidence base requirements, new development must be delivered to accommodate these growth requirements. Design-led schemes will result in land being used optimally, whilst ensuring that the prevailing pattern of development of the area is safeguarded. Whilst the character of an area will evolve over time, a comprehensive design led development, that follows relevant guidance, will ensure that changes are gradual and sensitive to	Additional text to ensure consistency with the NPPF, the London Plan and other MM and to ensure the policy is effective

Ref	Page/policy/ para	Modification	Reason for Modification
		the prevailing pattern of development. High quality development should not appear at odds with the character and context of the site and surrounds, and must ensure the build quality allows it to remain a good example of design for the lifetime of the development. 2.0.2 Much of Harrow is comprised of suburban residential areas which were formed by the expansion of the railways north out of London. A strong suburban character still exists, with marginally taller town centres punctuated across the borough. The Harrow Metropolitan Town Centre and Wealdstone District Centre form part of the Harrow & Wealdstone Opportunity Area (as defined in the London Plan (2021)), which provides a notable difference in character. Over the previous Local Plan period, the Harrow & Wealdstone Intensification Area (later renamed the Opportunity Area) has been the focus for development in the borough, given the town centre locations and highly sustainable nature of the defined area. A number of allocated sites within the Opportunity Area have been delivered, delivering a higher quantum of development than initially envisioned through larger scale height and density. 2.0.3 Across the plan period, the Harrow & Wealdstone Opportunity Area will remain a focal point for development, in general conformity with the London Plan. New development must respond to the different character areas within it, which comprise suburban residential, large scale development opportunities and town centre locations. 2.0.4 Outside of the Harrow & Wealdstone Opportunity Area there is a noticeable suburban character predominately made of 2 to 3 storey buildings. Where town centres adjoin administrative boundaries with neighbouring boroughs, the Council will commit to working with strategic partners to optimise appropriate development of the town centres. 2.0.5 Almost two-thirds of Harrow's housing stock dates from the inter-war period. Significant neighbourhoods of semi-detached and short terraces appeared rapidly as fields became homes, gardens, streets, parades and recreation grounds. This 'Metroland' housing continues to be one of the principal characteristics of Harrow's suburbs, particularly to the southeast and southwest of the borough. The characteristics of the developments that shaped Harrow over that time, are still prevalent across suburban Harrow today. New development therefore should be brought forward in a manner that ensures the unique characteristics of Metroland are maintained across suburban Harrow, and not eroded overtime by inappropriate development. To assist with new development in the suburban areas of Harrow, developments should take consideration of the guidance set out within the Harrow Tall Buildings (Building Heights) Supplementary Planning Document (2023) and the wider development plan policies. 2.0.6 The Harrow Characterisation and Tall Building Study (2021) provides a borough wide analysis of the character of Harrow. It sets out general building heights, plot sizes, building typologies, land uses, and identifies the distinction between the urban, suburban and semi-rural parts of the Borough. It forms a useful starting point for proposals to assist in understanding the character and context in which a development seeks to occur, and therefore how a proposal is able to evolve to ensure a high-quality design appropriate for its context is achieved. New development proposals should address this evidence base document as a starting point, then provide a more localised context analysis to support any design led application. 2.0.7 New development must consider the policies of the wider development plan, ensuring that proposals deliver on all relevant requirements for a successful development. The delivery of high-quality design is not limited solely to the external appearance of a building, as the wider site and context must also be addressed. Where public realm is to be delivered, this must be of a high-quality finish and address secure by design principles and be supported by appropriate infrastructure. Heritage assets contribute to Harrow's character across the borough and their significance needs to be considered as part of all development proposals (see ~~Strategic~~ Policy HE1 ~~02~~ (Historic Environment). High quality design also includes ensuring that where a residential use is proposed, the amenity, space and access requirements, of future occupiers meet the policy requirements set out in the development plan. 2.0.8 New development will result in change to an area, and the potential impacts will vary depending on the scale of development and the context within which development is located within. The impacts of such development are felt by communities that live in these areas, and they should have an influence on the final development scheme that is submitted for planning permission. Major applications should ensure that early and effective engagement has been undertaken with the local community. They	Modification to para 2.0.7 to ensure clarity by citing correct policy

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		should demonstrate the level of engagement and how feedback has been positively incorporated into the final submission to the Council. 2.0.9 The Council recommend that applicants take advantage of the pre-application service prior to submission of any planning application. This service provides applicants the opportunity to ensure proposals are able to be brought forward with the best opportunity to be policy compliant and therefore receive a positive outcome. Major applications and those that are contentious are also able to take advantage of Planning Performance Agreements to provide continual dialogue between applicants and the Council to look to address multiple issues over what can be a lengthy design evolution process. As part of this, applicants should engage with the Council's design review process. This process engages external professionals who can review and provide advice to applicants to assist in evolving a scheme to ensure it meets the exemplary design that best optimises the site and achieves a scheme that is appropriate for its context. 2.0.10 New growth requires infrastructure to support its potential impacts, such as ~~highway~~ transport improvements, school places, access to doctor surgeries. The Council will work with strategic partners identified through the Harrow Infrastructure Delivery Plan (and sub-regional strategic infrastructure delivery plan where appropriate) to identify required infrastructure to support development. When developing proposals and considering new infrastructure the Active Design Checklist should be followed to assist in supporting physical activity equitably for all within the community. Consideration to Chapters 6 & 7 of this plan should also be undertaken.	Modification to paragraph 2.0.10 to provide consistent and broader terminology to ensure an effective policy
MM6	Policy GR1 up to para 2.1.8 pp34-37	**Policy GR1: Achieving a High Standard of Development** *Design and Layout Considerations* A. All development proposals must achieve a high standard of design and layout that respects the character and context of the locality that it is proposed in and contribute to healthy places. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted. B. To ensure the most efficient and optimal use of land, proposals must take a design led approach by: a. Responding appropriately to the local context in terms of building height, bulk, massing, footprint, building line, scale and existing design characteristics; b. Incorporating durable high-quality materials that reflect local character and ensure a high-quality appearance is maintained over the lifetime of the development; c. Providing high quality (hard & soft) landscaping, amenity space and play space to support the overall quality of a successful development. Proposals should seek to retain or enhance existing landscaping, biodiversity or other natural features of merit (including rivers and the riparian zone); d. Include appropriate sustainability measures and contribute where feasible to the circular economy; e. Residential development must comply with London Plan Minimum Internal Space Standards for New Dwellings; f. Ensuring designs are human in scale at ground floor; g. Secure by Design principles should be considered at an early design stage, including ensuring that development (including proposals for redevelopment, refurbishment or change of use) deters and is resilient to terrorism and emergencies. This includes development relating to the public realm; ~~h. Ensure that development complies with the standards set out in the London Plan, and this Local Plan; and~~ ~~i. Taking a comprehensive and coordinated approach to development including respecting existing site constraints including utilities situated within sites.~~ *Residential Amenity* C. Proposals should ensure amenity for existing, ~~and~~ future, and neighbouring occupiers would be safeguarded, in relation to: a. Adequate daylight, sunlight, internal layout, privacy and outlook for adjoining and future occupiers and users within its context;	Modification to Part B.c to provide clarity of matters to be addressed by this policy and to make the policy effective and consistent with the NPPF Delete Part B.h to remove repetition from the Development Plan Delete Part B.i as not necessary for soundness

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		~~b. The adequacy of the internal layout of buildings in relation to the needs of future occupiers and any impact on neighbouring occupiers;~~ ~~c~~b. Appropriate levels of amenity space in terms of both quantum and quality for future occupiers; ~~d~~c. Applying the Council's 45-degree code where relevant to ensure appropriate relationship between buildings, primary facing windows to habitable rooms and outdoor private amenity space; and ~~e~~d. The impact of the proposed use and activity on noise, including hours of operation, vibration, dust, air quality and light pollution on future and existing occupiers. ~~D. Proposals that conflict with B and C above will be resisted.~~ ~~E. In addition to B and C above, proposals seeking to extend homes and / or convert into multiple homes should address further guidance published by the Council on such matters.~~ ~~F~~D. Development which would prejudice the future development of other parts of a site, adjoining land, or which would impede the delivery of adopted plans and allocated sites, will be resisted. *Accessibility* ~~G~~E. Residential development must be designed to include wheelchair and accessible standard housing. ~~in accordance with Policy D7 of the London Plan. Accommodation for elderly people will also provide appropriate wheelchair accessibility in accordance with Policy HO6.~~ ~~H~~F. Non–residential development and change of use proposals must be accessible to all and with dignity ~~(Policy GR2)~~ and new public realm development must also take into account the accessibility needs of all users. ~~(Policy GR3)~~ **Supporting Text:** 2.1.1 The spatial strategy / vision sets out the overarching strategy for ensuring new developments are of a high-quality design and do not impact on residents' amenity. 2.1.2 This Policy provides details on the key elements of good design, layout and amenity that need to be considered for all scales of development ranging from major development schemes to residential extensions and conversions. New development and changes of use proposals offer the potential to strengthen the valuable components of the Borough's existing built environment whilst realising the opportunity of previously developed land to meet future housing and economic needs without loss of open space. High-quality design should lead to creating healthy places, which can lead to a better quality of development and environment, which in turn is beneficial to the health of residents. 2.1.3 The massing, bulk, scale and height of buildings are significant components of an area's character, and help to convey the distinction between urban, suburban and semi-rural parts of the Borough. New development where appropriate should address the National Model Design Code, National Design Guide and London Plan Optimising Site Capacity Guidance, to ensure development opportunities are optimised and address all relevant material planning considerations, including local context (such as the historic environment and protected views ~~heritage etc~~). London Plan Minimum Internal Space Standards for New Dwellings must be complied with (noting in some instances Nationally Prescribed Space Standards may be appropriate) for new residential development). 2.1.4 Quality of execution is key to the realisation of design success, and in this regard the materials, colour, entrance and window details, external services and telecommunications equipment can significantly detract from a building's finished appearance, particularly in mixed use and multi-occupancy developments. 2.1.5 The design of the spaces between buildings, both private and public, are key to the quality of the environment and the experience of those who use them. This includes hard and soft landscaping, natural features, boundary treatments, waste and cycling enclosures. The provision of appropriate space around buildings will frequently be informed by the character and pattern	Modification to amalgamate Part C.a and C.b to ensure an effective policy. Delete Part D as not necessary for soundness Delete Part E as not effective Modification to Part G to remove duplication with the London Plan Modification to Part F to remove cross-referencing to other policies and ensure the policy is effective. Modification to para 2.1.3 to provide greater clarity in relation to local context and the Historic Environment

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		of development in the area, which will in turn be relevant to the appropriate gaps and distances needed to safeguard the privacy and amenity of neighbouring occupiers. Space around buildings is important not only as a setting for the building in its context, but also for reasons of functionality. It enables the implementation and successful growth of landscaping schemes, biodiversity net gain, provides an outdoor amenity for occupiers and space for refuse storage, car parking etc. It may also be an important element of a site's plan for the sustainable management of flood risk and surface water drainage. Proposals should optimise the use of a site to ensure that there are no 'left over' spaces that are neither functional nor visually beneficial. 2.1.6 Landscaping should be included as an integral part of the overall design of a development proposal, in line with Policy GI4 Urban Greening, Landscaping and Trees. The landscape and buildings need to be considered together from the start of the design process and careful consideration given to the existing character of the site including its typology and existing trees and landscape. 2.1.7 The risk of terrorism and other emergencies is ever present, and the nature of the risk and potential consequences will change during the plan period. In this context, all new development, as well as proposals for redevelopment, refurbishment or change of use, should be resilient to terrorism and other emergencies. It should consider secure by design principles, and design responses should be proportionate to the potential risk commensurate to the proposal and its location. This includes development relating to the public realm. Relevant developments should engage with Metropolitan Police (Counter Terrorism Security Advisors) to ensure appropriate design solutions are incorporated to deter terrorism whilst maintaining a high quality of development. 2.1.8 The prevailing building height in Harrow's suburban areas is two storeys, whilst the Borough's district and local centres have prevailing heights of two and three storeys. Development within these ~~character areas~~ localities should be considered against the Tall Building (Buildings Heights) Supplementary Planning Document, which provides guidance on context analysis and design.	Modification to para 2.1.8 to remove character areas as not a defined term within the plan.
MM7	Policy GR3 up to para 2.3.7 pp41-43	**Policy GR3 Public Realm and Connecting Places** A. New public realm development will be supported where appropriate. It should: a. Respond to the local and historic context in which it is proposed to be located within; b. Be designed to achieve the Mayor's Healthy Streets for London indicators to promote non-vehicular travel in a safe, effective, and efficient manner; c. Incorporate careful implementation of electric car charging points, wayfinding signs and infrastructure for cyclists and walking, where these do not add to street clutter. Wayfinding must be done in a consistent manner; d. Demonstrate flexibility to adapt to its locality during both daytime and night-time; e. Provide an appropriate balance of high quality soft and hard landscaping, to enable areas of rest including seating, shade, and shelter; f. ~~Where appropriate, p~~ Provide for free drinking water and public art; ~~and~~ g. ~~Where appropriate, b~~ Be adaptable for performance / cultural uses; and~~.~~ h. Utilise existing blue and green assets on site where available, or where not present introduce into new development ~~B. Public realm developments will be resisted where they do not comply with the above.~~ ~~C.~~ B. Where development delivers new public realm, or joins existing public realm, it must be designed in accordance with (A) above, and demonstrate how it could be tied into existing public realm satisfactorily and relate to the new built environment successfully. ~~D.~~ C. ~~Where appropriate, p~~ Public realm improvement and its future maintenance and management will be secured through the use of Planning Obligations.	Modification to A.f and A.g to delete text unnecessary to tests of soundness and amendment of 'and' to improve the effectiveness of the policy. Deletion of Part B as text unnecessary for soundness and to ensure a positively worded policy. Modification to Part D to delete text unnecessary to tests of soundness

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		~~E.~~ D. The Council will seek to produce a masterplan for the Harrow Metropolitan Town Centre. New and enhanced public realm must be delivered where it is consistent with the design principles in the Masterplan. **Supporting Text:** 2.3.1 Public realm constitutes all areas of a development or area that are available for the public to visit, such as a neighbourhood or town centre. The quality of public realm plays a significant role in how people feel about an area, and their willingness to engage with it. It is important that the public realm is designed to be accessible to all within the community, where people are able to feel safe passing through as part of a journey or choosing to rest or dwell. 2.3.2 The design of the public realm cannot be a one size fits all approach, it must provide a high-quality space suitable for the surrounding area and its users. Whilst new public realm provides an opportunity to encourage new high-quality space, it should also respond to the existing landscape / townscape character of an area, picking up on local distinctiveness. Existing local characteristics that contribute to the understanding or appreciation of an area should be retained, including existing trees. All new or enhanced public realm should be based on the guidance as set out Historic England's Streets for All – London (2018), and the Mayor's Healthy Streets Approach. 2.3.3 Following this guidance, public realm should ensure that there is not an over reliance on the private motor vehicle. The layout and wayfinding of public spaces should be intuitive and allow people to confidently walk or cycle through the space as part of a wider journey. This approach activates the space, allows for pedestrian priority and positively impacts air quality. 2.3.4 Sustainable infrastructure will be encouraged, facilities such as electric vehicle charging points will be supported where these are located in optimal locations across the borough. The Council's draft Long Term Transport Strategy has 'ensuring communities feel safe making journeys' as a priority in recognition that of the role the public realm has in promoting sustainable forms of transport. 2.3.5 The public realm must be carefully designed to account for different conditions. Specifically, it must be successful during the daytime and also must ensure that during dark hours, the security and safety of users is considered. Appropriate lighting should be provided, whilst ensuring that light and glare does not become a nuisance to nearby residential occupiers, historic environment or harmful to biodiversity in line with Policy GR7 (External Lighting). Appropriate hard and soft landscaping, and street furniture ensures that areas across the public realm afford opportunities for areas to rest, specifically to provide shade during the heat of the day, or shelter in wetter weather. Landscaping should take the opportunity to install sustainable urban drainage systems to reduce surface water run-off in line with Policy CN4 (Sustainable Drainage). New public realm should, where practicable, provide for environmental improvements in accordance with relevant policies in Chapter 7 of this local plan. 2.3.6 Where appropriate, free potable water should be made available to reduce single use plastic. 2.3.7 Groups of people congregating can lead to health, safety, and antisocial behaviour concerns. To mitigate this, new public realm should be designed in a manner that allows safe access and exit for a high volume of people across a short period of time. ~~Applicants should utilise the Secured by Design Resilient Design Tool. All new public realm should be developed in accordance with Policy GR3A (Inclusive Design) and GR3B (Safety and Security and Resilience to Hazards).~~	Modification to para 2.3.7 to provide clarity within the supporting text by deleting unnecessary cross-referencing to other policies.
MM8	Policy GR3B Policy only p44	**Policy GR3B: Safety, Security and Resilience to Hazards** Public Realm	

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		A. All new public realm must be safe for residents and visitors alike. New public realm must be delivered in accordance with Policy GR3 (Public Realm & Connecting Places) and also incorporate appropriate counter terrorism measures, including but not limited to: a. Where public realm is intended to be pedestrian focused, appropriate measures to ensure controlled access for motor vehicles (including hostile vehicles). b. Ensure safety measures, particularly for safe exits, when there are high numbers of people expected to be congregating. c. Natural surveillance, good sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places are provided within public realm; and d. Effective but sensitive use of security cameras. New Build or Conversion of Existing Buildings B. ~~All n~~ New build and conversions / change of use of existing buildings (except householder applications) should ~~must~~ consider the requirement for counter terrorism and secured by design measures including: a. Any new build development should aim for a secure by design gold standards, to ensure matters such as crime, fear of crime and anti-social behaviour opportunities are mitigated. b. Proposals that involve vulnerable or high risk uses that require counter terrorism measures must engage with the Metropolitan Police, and any required mitigation measures ~~must~~ should be considered early in the design stages. c. ~~Consider any~~ Where a development introduces increased vulnerability within a ~~of any~~ new use when converting an existing building, ~~and ensuring~~ it should be ensured that appropriately designed counter terrorism measures are provided and respond to the existing building and street scene having regard to a full risk assessment. ~~d. Undertake a full risk assessment commensurate to the scale and type of development to demonstrate appropriate measures have been included through a change of use of a building to a more susceptible use than existing.~~ C. All new development must demonstrate appropriate fire safety design measures and strategies to protect life.	Modifications to Part B to provide greater flexibility and clarity in relation to householder applications. Modifications to ensure a positively worded policy and to ensure an effective policy by linking the criteria. Modification to Part B.b to ensure a positively worded policy Modification to amalgamate Part B.c and B.d to provide clarity of policy to ensure it is effective. Delete B.d.
MM9	Policy GR4 up to Para 2.4.2 pp52-53	**Policy GR4 ~~Building heights~~ Tall Buildings** A. A tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure). ~~Tall buildings are directed to designated tall building zones within the Harrow & Wealdstone Opportunity Area. Within the Opportunity Area, a tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure).~~ B. Tall buildings are directed to designated tall building zones within the Harrow & Wealdstone Opportunity Area. ~~B.~~ C. Proposals ~~shall not exceed~~ will be supported where proposals reflect the appropriate building heights as set out within the designated tall buildings zones shown ~~within~~ on the Policies Maps~~.~~ ~~C The Council will restrict proposals for tall buildings outside the identified tall building zones.~~ ~~D. Outside of the Harrow & Wealdstone Opportunity Area, there are no designated tall building zones. A tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building.~~ Design Considerations	Modification of policy title to provide clarity to what the policy addresses and provides an effective policy. Modifications Part A to provide clarity and remove duplication (with Part D) by applying the definition across the entire borough. Modification to insert new Part B to provide clarity to the locations of Tall Buildings and therefore ensure an effective policy. Modification to original Part B (new Part C) to be more positively worded. Deletion of original Part C to ensure a positively worded policy.

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		E. Developments must demonstrate compliance with the design criteria in relation to visual, functional, environmental and cumulative impacts as set out in Policy D9C (Tall buildings) of the London Plan (2021), and shall also address how the proposal: a. Would be appropriate for both the application site and adjoining areas outside the Opportunity Area ~~the wider context~~, especially where a proposal may impact areas of significantly lower density and height; b. Would be of exemplary design; c. The protection and preservation of ~~local heritage views~~ protected views, vistas and landmarks, having regard to Policy GR5 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps); and d. Address matters in relation to the safety of occupiers and any mitigation required. F. Proposals that do not meet the definition of a tall building as set out under Part A will ~~not automatically be considered acceptable~~ be considered against ~~and compliance with~~ the remainder of the development plan ~~is still required~~. **Supporting Text:** 2.4.1 Land is a finite resource and therefore it is paramount to ensure its use is as efficient as possible. Tall buildings provide the opportunity to make efficient use of land ~~(noting that other development can also positively contribute to optimising housing delivery),~~ and deliver against the requirements for a growing population, in terms of new homes, places to work and places for leisure and community. There may however be appropriate alternative building typologies and configurations (e.g. mansion blocks and mid-rise) that can provide a similar number of homes and a more suitable design solution. Proposals for tall buildings should therefore provide a design rationale to demonstrate that a tall building is the most appropriate form of development for the site and its context. ~~However, it is recognised that tall~~ Tall buildings can be divisive by their very nature, and can significantly impact an area and the people who visit, live and work in them. The London Plan (2021) through Policy D9 (Tall buildings) requires boroughs to identify locations that are appropriate for tall buildings, and to outline what would constitute appropriate heights within those designated zones. These should be delineated on planning policy maps. 2.4.2 The Harrow Characterisation & Tall Building Study (2021) informs the Harrow Local Plan, by providing a detailed contextual analysis of the character of the borough. This has been supplemented by a Tall Building Study (2024) for the Harrow & Wealdstone Opportunity Area, which is the most sustainable location within the borough, and the location able to accommodate the most growth and change. By applying a suitability and sensitivity sifting process, the Tall Building Study (2024) has identified zones within the Harrow & Wealdstone Opportunity Area where tall buildings may be appropriate, and what maximum appropriate heights would be within these zones. Within designated zones, care must be taken to arrange elements of height appropriately, as not all parts of a designated zone will be appropriate for height. Some, but not all, buildings could be tall in these areas. Of these tall buildings, only a minority should reach the maximum appropriate height. Where a new development does not meet the height threshold of a tall building as set out within this policy, this does not automatically make it acceptable. All new development must be considered against the relevant policies of the development plan.	Modification to delete the definition in Part D as now included in Part A. Modification to Part E.a to ensure an effective policy. Modification to insert new Part E.b to ensure an effective policy by including the requirements set out in paragraph 2.4.8 within the policy. Modification to Part E.c to ensure consistency with terminology with the development plan Modification to Part F to ensure text is consistent with London Plan. Modifications to para 2.4.1 to clarify the role that other building typologies can play in meeting development needs in the borough in order to improve the effectiveness of the policy with respect to other considerations (i.e. efficient use of land). Modification to para 2.4.2 to ensure consistency with London Plan text
MM10	Policy GR4A up to 2.4.19 pp	**Policy GR4A: Basement Development** A. Basement development will be supported for ancillary accommodation where they: e. Do not harm neighbouring residential amenity; f. Do not comprise more than 50% of the amenity spaces within a site; g. Do not extend into the rear garden greater than 50% of the depth of the host dwelling when measured from the principal rear elevation; h. Do not exacerbate flood risk, ground water conditions, ground stability or harm tree roots within the application site or neighbouring sites;	

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		i. Remain as ancillary accommodation to the primary dwelling, retaining internal access through the primary dwelling with satisfactory amenity conditions. j. Provide ancillary features such as lightwells, grilles and railings that are appropriate in size and number and do not result in visual clutter within the front garden causing harm to the street scene. k. Continue to provide for appropriate landscaping and parking provision within the front garden B. Basement proposals for ~~independent housing~~ <u>self-contained homes</u> will not be supported. C. Habitable space within basement proposals located within Flood zone 3a/3b will not be supported. D. All basement proposals must be supported with a Construction Method Statement **Supporting Text** 2.4.15 Although basement developments can help to make efficient use of the borough's limited land it is important that this is done in a way that does not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas or the natural environment. Whilst much of a basement is set below ground and therefore for the most part not overly visible from the wider area, certain required design elements and paraphernalia associated with them can cause harm to the application property and wider area. Where basements seek to provide further habitable space within a home, access to natural light must be achieved. This will often be achieved by removing part of the front or rear (sometimes both) gardens to allow for lightwells to be provided. Following this other paraphernalia such as grilles, windows and railings are utilised to allow for light into the basement area, and also to provide safety and security. Care must be taken to ensure that paraphernalia is appropriate and would not result in clutter, specifically in the front garden where such additions can be much more visible. The existing street scene character will be taken into consideration for basements proposals where paraphernalia will be introduced into the front garden, along with impacts of loss of car parking and existing landscaping. Developments within the setting of a heritage asset or conservation area will need to have regard to policies within the wider development plan. 2.4.16 Whilst basement development is an option to extend existing dwellings to provide for more habitable space, self-contained homes will not be supported within basements. Providing adequate light into self-contained homes within basements is often very challenging, whereby resulting in future occupiers not receiving an adequate level of residential amenity. Furthermore, separate units would often result in a separate access door, which can be at odds with the prevailing pattern of development in much of suburbia. Furthermore, an increase in residential units through basement development can place pressure on front gardens to provide for adequate paraphernalia such as off-street carparking, cycle and bin storage, along with soft landscaping. 2.4.17 Whilst much of basement development is below ground, associated paraphernalia and in some instances, lighting, ventilation and retaining structures may cause amenity issues to neighbouring properties. Care must be taken to ensure that harm to neighbouring properties is mitigated. 2.4.18 Basements by their very nature result in substantial excavation within a property, which can have an impact on ground conditions within the site and also for neighbouring properties. Firstly, new basement development within flood risk prone areas can result in risk to future occupiers, and therefore habitable space / rooms will not be permitted in such locations. Non-habitable space may be appropriate, however may require a suitable pumping device. Similarly, excavation can result in harm to existing trees within the application site, but also within the root protection zone of trees that may be located outside of the application property. The scale of basements should be revised to ensure that nearby trees are not adversely impacted by the development. Basements that potentially impact on existing trees should refer to Policy GI4 (Urban Greening, Landscaping and Trees).	Modification to Part B to ensure consistent terminology with London Plan

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		2.0.11 Proposals for new basements within an Archaeological Priority Area (APA) should consult with the Greater London Archaeological Advisory Service (GLAAS) and where appropriate be accompanied by a desk-based assessment.	Modification to insert new para 2.4.12 to provide clarity to policy to ensure an effective policy.
MM11	Policy GR5 Policy only p61	**Policy GR5 View Management** A. The protected views identified in Appendix 3 will be safeguarded in accordance with the Harrow Views Assessment (2024) and Policy HC4 (London Views Management Framework) of the London Plan (2021). B. Where there is a protected view: a. Development within a Protected Views Restricted Corridor (shown in red) that exceeds the specified threshold height will be refused; and b. Development in the Protected Views Setting Corridor (shown in yellow) should form an attractive element in its own right and preserve or enhance the viewers' ability to recognise and to appreciate the landmark. C. Development should not harm and, where possible, should make a positive contribution to the characteristics and composition of the protected views and their landmark elements. It should also conserve and enhance viewers' ability to recognise and to appreciate important landmarks, in particular St. Mary's Church and Harrow on the Hill, and the Harrow Weald Ridge as seen from designated viewing locations. D. Development in the foreground and middle ground of a protected view should not be overly intrusive or unsightly to the detriment of the view, or detract from the prominence of the landmark. E. Development proposals in the background of a protected view should give context to landmarks and not harm the composition of the protected view as a whole. F. Viewing places should be accessible and managed so that they enhance people's experience of the view. G. Opportunities to create new local views and vistas should be ~~maximised~~ secured through the design and layout of new development. Developments outside of the Opportunity Area, but within a designated landmark viewing corridor (or wider setting consultation corridor) must take into consideration the guidance in the Harrow Tall Building (Building Heights) Supplementary Planning Document (2023).	Modification to Part E to provide clarity to type of view the policy applies to, in order to ensure an effective policy Modification to Part G to provide a more flexible and effective policy
MM12	Policy GR6 and associated supporting text p64	**Policy GR6 Areas of Special Character** ~~A. Proposals affecting an area of special character will be assessed regarding:~~ ~~a. The impact of the proposal upon the strategic value of the area of special character;~~ ~~b. The desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character; and~~ ~~c. The protected views to and from areas of special character.~~ ~~B. Proposals that would realise sustainable opportunities for increased appreciation of, or public access to, areas of special character will be supported.~~ ~~C. Proposals that would substantially harm an area of special character, or its setting, will be refused.~~	Delete policy and associated supporting text and map (paragraphs 2.6.1 – 2.6.10) as policy not justified

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		~~Supporting Text~~ ~~2.6.1 Rising above the predominantly two storey, suburban development of the central lowland areas, Harrow's areas of high ground are of strategic importance to the character and distinctiveness of the Borough. Pinner Hill and Harrow Weald Ridge provide an elevated horizon of tree cover and open countryside which spans across the north of the Borough and acts as a visual reminder that Harrow is an outer-London borough, a transition between the highly urbanised characteristics of central & inner London and the more rural character of the counties beyond. Harrow Hill is a topographical feature with an identifiable profile to the south of the Borough, forming the verdant 'shoulders' upon which sits St. Mary's Church and supplemented by a substantial body of open space around the Hill's lower slopes. Harrow Weald Ridge, Pinner Hill and Harrow on the Hill contain a significant number of the Borough's heritage assets. Harrow on the Hill is also of cultural importance as the Borough's principal historic settlement and as the location of Harrow School.~~ ~~2.6.2 Reflecting the strategic importance of these parts of the Borough, the Local Plan retains their designation as areas of special character and undertakes to manage development to maintain their special character. The extent of the areas of special character is delineated on the Harrow adopted Policies Map.~~ ~~2.6.3 The strategic value of the Harrow Weald Ridge and Pinner Hill area of special character is as a significant landscape backdrop that comprises extensive tree cover, including the cumulative contribution of small groups and individual trees, and major open areas. New development must also consider the area of special character extends into Hertsmere Borough Council, and impacts within its administration boundary should be given due regard.~~ ~~2.6.4 The strategic value of the Harrow on the Hill area of special character is the prominence that the Hill provides to the historic hilltop settlement, particularly St. Mary's Church and historic Harrow School buildings, and the setting created by the major open areas, including the cumulative contribution of groups and individual trees. The boundaries of the Harrow on the Hill area of special character take in playing fields and other spaces which form Metropolitan Open Land around the hilltop settlement.~~ ~~2.6.5 As described above, parts of Harrow Weald Ridge, Pinner Hill and Harrow on the Hill provide substantial tree cover and extensive tracts of open and natural land. These areas make a positive contribution to the borough through their relatively low light, air and noise pollution, as well as places for undisturbed habitat formation and wildlife movement.~~ ~~2.6.6 Heritage assets feature in each of the areas of special character. The townscape of Harrow on the Hill is a crucial component of its heritage as the principal, historic settlement in the modern Borough. At Pinner Hill and Harrow Weald Ridge historic farm complexes, cottages, villas and lodges, among other heritage assets, are valuable components of the areas' countryside and rural character.~~ ~~2.6.7 The value of protecting the Borough's areas of special character, and their features, is diminished if they cannot be seen and appreciated from within the urban and suburban environment.~~ ~~2.6.8 In order to manage Areas of Special Character, a thorough understanding of the potential impacts of development must be understood. Applications must be supported by a Townscape and Visual Impact Assessment (TVIA) carried out by a suitably qualified professional and be in accordance with the Guidelines for Landscape and Visual Impact Assessment (Third Edition) (or any superseding guidance). However, to address any heritage assets and potential impact, a Heritage Impact Assessment (HIA) must also be undertaken where appropriate.~~ ~~2.6.9 There are already many opportunities for residents and visitors to access and enjoy areas of special character. The London Loop strategic walking route passes through Pinner Hill and Harrow Weald Ridge, whilst the Capital Ring is routed through Harrow on the Hill. Bentley Priory Open Space, Stanmore Country Park and Stanmore Common all provide opportunities for the appreciation of the natural environment in Harrow Weald. The extension to Stanmore Country Park, known as Wood Farm, has~~	

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		~~been delivered over the previous plan period. This asset both increases public access to land within the Harrow Weald area of special character and provides a new, public viewpoint towards Harrow on the Hill and central London.~~ ~~2.6.10 Policy HE1 (Heritage Assets) includes requirements relating to Local Areas of Special Character. These are distinct from Areas of Special Character by virtue of their scale and character. Areas of Special Character reflect the overall structure of the borough with respect to the distinction between suburban / urban built up areas and the elevated, more rural and / or historic landscapes and the views they offer to and from them. Local Areas of Special Character on the other hand are more modest in scale, being areas of heritage, architectural, townscape and landscape value at a local, more internalised level.~~	
MM13	Policy GR8 pp69-70	**Policy GR8 Shopfronts & Forecourts** A. Proposals for shopfronts including blinds, canopies, front extensions and development on forecourts will be supported where: a. They provide an active frontage and are of a scale and proportion appropriate to the host building, architectural character and the wider character of the area in which it is located; b. They do not obstruct or adversely affect pedestrian or highway safety, particularly for users with visual impairment or impaired mobility; c. ~~They would conserve and enhance the significance of heritage assets;~~ d. ~~The shopfront would provide all-abilities inclusive access;~~ e. The illumination of shopfronts and forecourts would not detrimentally affect the amenity of neighbouring occupiers~~, or the significance of heritage assets~~; f. The proposal involves the installation of a new or replacement shopfront, the use of toughened glass will be required; and g. Awnings or canopies are retractable and fold away discreetly when not required outside of operational hours. Reinstatement of traditional awnings or canopies that were historically part of the shop would be supported. ~~B. Advertisements for shopfronts must accord with the requirements set out in Policy GR9 (Outdoor Advertisements, digital displays and hoarding) and any supplementary planning documents, specifically in relation to Conservation Areas.~~ ~~C.~~ B. Where security shutters are proposed they should be of an open mesh design and, wherever possible, should be located internally. ~~D.~~ C. Tables, chairs and other ancillary paraphernalia on forecourts will be considered on a case-by-case basis and must; a. Ensure the frontage does not appear cluttered within the streetscene; b. Ensure the pedestrian thoroughfare is not obstructed, allowing for the free flow of pedestrians, including those with disabilities. c. Ensure that highway safety is not compromised; and d. Only be used during hours that are appropriate for the centre within which they are located. **Supporting Text:** 2.8.1 For many pedestrians and shoppers, the ground floor frontages of buildings provide the principal perception of the quality of the built environment in town centres and neighbourhood parades. Well designed, practical shopfronts can make a positive contribution to the townscape and success of the Borough's shopping areas. 2.8.2 Both individually and cumulatively, minor development such as shopfronts, security shutters and canopies can influence perceptions of the accessibility and security of an area and visually impact the street scene. A proliferation of solid security shutters create a fortress-like atmosphere in town centres and neighbourhood parades when premises are closed, perpetuating	Modification to delete Part A.c Part A.d and part of Part A.e as deleted matters are covered elsewhere within the Local Plan, in order to reduce duplication and improve the effectiveness of the policy. Modification to Part B to delete cross-referencing to other policies within the Local Plan, as not required for the policy to be effective.

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		fear of crime and personal safety. Shutters with a transparent 'open mesh' design help to maintain visual interest and, along with a mix of appropriate town centre uses, help to enliven town centres during the evening. 2.8.3 Outdoor dining provides an opportunity for small businesses to increase their turnover and assists in enlivening a streetscene whether in a town centre or a small parade. 2.8.4 The installation of new shopfronts, including those that replace existing shopfronts, provides the opportunity not only to improve the appearance of the streetscene but to design-in safety and security features including toughened glass in preference to shutters to improve the safety and security of ground floor units. ~~Opportunities to repair or reinstate historic shopfronts have the potential to conserve or enhance heritage significance, as well as deliver wider public benefits in terms of sense of place, local distinctiveness, etc.~~	Modification to para 2.8.4 to delete text to remove repetition of matters addressed elsewhere in the plan, and to ensure consistent with the policy. Modification to ensure an effective policy
MM14	Policy GR9 up to para 2.9.3 pp71-72	**Policy GR9 Outdoor Advertisements, digital displays and hoardings** A. Proposals for advertisements on buildings and freestanding units will be supported where: a. They do not adversely affect the visual amenity of the area; b. They do not adversely affect the amenity of residential occupiers by reason of siting, illumination or noise; c. They are appropriate in scale and illumination to the location and, in the case of advertisements on buildings, the host building; d. They contribute to rationalising street clutter and help to achieve an inclusive, legible environment; e. They contribute to the safety of the public environment for pedestrians, cyclists and drivers; f. ~~They do not impede any existing or proposed surveillance equipment, and contribute positively to public perceptions of security;~~ g. ~~They do not adversely affect the amenity of any residential or sensitive area;~~ h. Advertisements associated with Wi-Fi or telecommunication infrastructure must be proportionate to the overall structure, and must not lead to an over proliferation within the locality; i. Advertisements associated with electric car charging stations must be proportionate to the to the overall structure, and should only relate to the charging station service provider. ~~Where advertisements vary from the service provider, proposals must comply with a - g above.~~ B. Advertisement hoardings will be appropriate in non-residential areas where they screen vacant or derelict sites, or sites where development is imminent. C. Proposals for advertisements and digital displays ~~resulting in a cluster of hoardings will be resisted where there would be~~ should ensure that they do not result in a cumulative impact upon amenity. D. Proposals for advertisements that advertise temporary events and markets in centres will be supported. **Supporting Text:** 2.9.1 Well designed and considerately located, commercial advertisements add to the interest and vibrancy of town centres and other commercial areas. Advertisements can also be used to identify uses and occupiers within a building or area and can contribute positively to the legibility of the urban environment. However, over-sized, insensitively sited and inappropriately illuminated advertisements can be unsightly, detract from the character of an area and run counter to the creation of safe, accessible	Modification to Part A.e to provide clarity to when policy is applied to ensure it is effective. Modification to Part A.f to delete text unnecessary to meet the tests of soundness Modification to Part A.g to delete policy addressed elsewhere in the plan. Modification to Part A.i to delete text unnecessary to meet the tests of soundness Modification to Part C to ensure a positively worded policy

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		environments. Applicants should consider guidance set out by the Advertising Standards Authority in the context of the imagery or text that they wish to advertise. 2.9.2 Advertisements within residential areas or at the interface of commercial and residential areas can adversely affect the amenity of the residential area. Advertisements which are illuminated or emit noise, such as those which provide a moving display, have considerable potential to cause nuisance to residential occupiers. In the more commercial context of town centres, illuminated and moving display units are to be expected, but can nevertheless adversely impact residential premises above ground level. ~~2.9.3 In determining the appropriateness of any illumination, the Council's Environmental Health Department will appraise lighting strategies submitted with planning applications to determine their appropriateness. Applicants should refer to the Institution of Lighting Professionals; Guidance Note 01/21 (The Reduction of Obtrusive Light) or any subsequent iteration.~~	Modification to delete para 2.9.3 as not necessary to refer to other guidance.
MM15	Policy GR10 up to Para 2.10.8 pp74-76	**Policy GR10 Development on Infill and backland sites, garage sites, ~~back~~ garden lands~~s~~ and non-designated open spaces ~~amenity areas~~** ~~*General*~~ ~~A.~~ Proposals on Infill, backland sites, ~~[~~non-designated~~]~~ open space, garden land and garage sites will ~~only be acceptable~~ be supported where: a. The proposal would be a high-quality design of a scale and intensity appropriate within the context it is located in. b. The development makes a comprehensive use of land, taking into account the potential for redevelopment on surrounding parcels. Housing on garden land on individual plots will not generally be considered to be comprehensive~~, and proposals should explore how neighbouring garden land within the area has the potential to be delivered comprehensively.~~ c. Ensure sufficient private garden / amenity space is provided for both the proposal site and any donor property. ~~b. Proposals assist in the delivery of homes as demonstrably needed [Strategic Housing Policy 03].~~ ~~c. Neighbouring amenity is protected in terms of access to daylight, sunlight and actual or perceived privacy, in accordance with Policy GR1.~~ ~~d. Ensure a satisfactory quantum and quality of landscaping to provide for amenity space and biodiversity enhancements.~~ ~~e. Appropriate levels of car parking is provided in line with Policy M2 commensurate to the scale of development, with servicing and refuse collection adequately addressed.~~ ~~f. The proposal is accessible to all.~~ ~~g. Addresses any relevant supplementary guidance.~~ ~~*Infill Sites*~~ ~~B. Proposals for gap sites located in an established street scene will be supported where they:~~ ~~a. Demonstrate compliance with A (a-g) above;~~ ~~b. Ensure sufficient private garden / amenity space is provided for both the proposal site and any donor property; and~~ ~~c. Satisfactory servicing, waste and cycle storage is provided.~~ ~~*Backland Development*~~ ~~C. Proposals that are located on backland sites will be supported where they;~~ ~~a. Demonstrate compliance with A (a-g) above;~~ ~~b. Provide satisfactory access to the development;~~ ~~c. Ensure appropriate waste servicing can be provided; and~~	Modification to Policy title to provide greater clarity in relation to the matters to be addressed by the policy. Deletion of part of Part A, Parts B, C, D, F, H and part of Part E. Amalgamate Part E.b with Part A. Modifications remove repetition within the policy and ensures an effective policy Deletion of second part of sentence of Part A,b to provide greater clarity

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		~~d. Ensure secure by design measures have been addressed.~~ ~~*Non-designated open space*~~ ~~D. Proposals for new housing on non-designated open space will be supported where they;~~ ~~a. Demonstrate compliance with A (a-g) above;~~ ~~b. Ensure highway safety is maintained; and~~ ~~c. Address any relevant supplementary guidance.~~ ~~*Garden land*~~ ~~E. Proposals for new housing on rear gardens will be resisted unless they;~~ ~~a. Demonstrate compliance with A (a-g) above; and~~ ~~b. Form part of the comprehensive development of a number of plots.~~ ~~E.1 Housing on individual rear gardens will not be supported.~~ ~~*Garage sites*~~ ~~F. Proposals that seek to redevelop garage sites within a development will be supported where they:~~ ~~a. Demonstrate compliance with A (a-g) above; and~~ ~~b. Satisfactorily demonstrate the loss of garages will not cause or exacerbate parking pressure within the surrounding network.~~ **Supporting Text:** 2.10.1 Across outer London there are numerous opportunities to deliver appropriate small site housing developments, which are able to contribute to delivering housing needs for the borough. Development opportunities can exist on sites that constitute infill, back land sites, [non-designated] open space, garden land and garage sites. Much of the suburban area in Harrow is made up of 2-storey residential homes with rear gardens that provide amenity space for residents and biodiversity habitat. 2.10.2 Residential gardens are a strong element of suburban character and are an important component of the quality of life enjoyed by many Harrow residents. Development in these areas requires careful management to ensure this character is respected. However, character across the borough will continue to evolve over time, which will include the gentle densification of suburbia. Furthermore, the borough will continue to face pressure to deliver against its housing target set for it in the London Plan, but also to deliver the right type of homes that Harrow residents need. 2.10.3 The National Planning Policy Framework (2023) (paragraph 70) states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and such developments are able to often be built-out relatively quickly. The London Plan (2021) Policy H2 (Small sites) sets out that boroughs should recognise that character evolves over time, and that small sites can provide a valuable contribution to meeting housing targets. The Plan sets a small site housing target of 375 homes per year for Harrow; this forms a component of the overall target of 802 homes per year. 2.10.4 The Council will seek to encourage appropriate opportunities to achieve the requirements as set out in Policy H2 (Small sites) of the London Plan (2021) which encourages development in locations well serviced by public transport and amenities. Small sites development must comply with policy H03 (Optimising the use of small housing sites) of the Local Plan. The Council will look to progress previously commenced work in relation to small sites within Harrow, specifically in relation to outcomes of the	

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		Small Sites: Capacity Study (2022) and subsequent Design Code / guidance work. Any design work will look to assist in the delivery of small site developments by providing clarity and certainty around design requirements. 2.10.5 Small site development outside of the sustainable areas identified in policy HO3, will be less acceptable. 2.10.6 The prevalence of detached, semi-detached and terrace style housing provides a character of family homes across the borough from both a visual and use perspective. This character must be considered in any development application. Local Plan Policy GR1 (Delivering high quality design in Harrow) must also be addressed as any new development. 2.10.7 Infill, back land sites, [non-designated] open space, garden land and garage sites are often constrained sites and in close proximity to existing residential properties. Proposals must be creatively designed to ensure that whilst new development respects the character of a location's context, is also ensures that window placements protect the amenity of existing and future occupiers. New development should also ensure that new homes and their respective amenity outdoor amenity space is accessible for a range of users. Amenity space must be useable and functionable appropriate for future occupiers. ~~2.10.8 Local Plan Policy GR1 (Achieving a High Standard of Development Design and Layout Considerations) must also be addressed as any new development.~~	Modification to para 2.10.8 to delete cross referencing to other policies in the Local Plan
MM16	Policy GR11 up to para 2.11.4 pp80-81	**Policy GR11 Planning Obligations** A. Planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes, and to ensure that all relevant development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Relevant infrastructure may include matters (but not limited to) such as public transport, active transport, health, counter-terrorism and public realm improvements. B. ~~Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.~~ **Supporting Text:** 2.11.1 The Harrow Community Infrastructure Levy (CIL) will ensure that new development helps to fund the cost of new or enhanced strategic infrastructure to support the cumulative impacts of development across the borough. The list of the types of infrastructure to be funded by CIL is set out in the annual infrastructure funding statement available on the Council's website, such as schools, libraries and healthcare. 2.11.2 A proportion of total Harrow CIL receipts is allocated to fund projects that reflect the priorities within the area in which Harrow CIL was received ('Neighbourhood CIL'). The Council will work with relevant stakeholders to identify local priorities for the spending of NCIL. 2.11.3 The Council has produced an Infrastructure Delivery Plan as part of the Local Plan review, and this evolving document will form the basis for infrastructure and funding priorities across the plan period (2021 to 2041). Regard will also be given to other infrastructure related strategies, such as the Harrow Long Term Transport Strategy (LTTS), Local Implementation Plan (LIP) and Harrow Indoor and Outdoor Sporting Facilities Strategy (as examples). 2.11.4 Where new development requires a bespoke mitigation to make a scheme acceptable in planning terms, the Council may enter into a legal agreement with a developer. A legal agreement would take the form of a S.106 agreement, where an obligation will be secured on a specific matter. However, the nature of site-specific impacts means they vary widely depending on the site, its local context, and the development proposed. Therefore, beyond the requirements for affordable housing, it is not possible to ascribe a set of circumstances under which certain types of obligations will be sought as a norm. Obligations can take the form of monetary contributions or non-monetary contributions (such as those relating to employment and training provision, travel plans, design quality, biodiversity net gain monitoring etc). Where considered a requirement a S.106 obligation may be secured	Modification to Part A to include an additional example of infrastructure for which Planning Obligations maybe sought, to provide an effective policy. Delete part B as not positively prepared.

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		for ~~public transport for~~ improvements to infrastructure such as public transport ~~services~~, station~~s~~ access or capacity, junctions/roads or infrastructure to provide increased capacity or improved accessibility. or to contribute to ~~new~~ an improved public realm. Similarly, S.106 contributions towards walking and cycling infrastructure or the wider public realm may also be required from developments to meet the Mayor's Healthy Streets Approach or to address deficiencies identified through an Active Travel Zone Assessment. Applicants should refer also to Policy GR 3 (Public Realm and Connecting Places).	Modification to para 2.11.4 to provide clarity and consistency with the policy.

Chapter 3 – Historic Environment

Ref	page/policy/ para	Modification	Reason for Modification
MM17	Policy SP02 Policy only p84	**Strategic Policy 02: Harrow's Historic Environment** A. The Council will adopt a significance-based approach to the management of the historic environment and seek to conserve and enhance the significance of both designated and non-designated heritage assets. The Council will ensure that the council delivers a positive strategy for the conservation and enjoyment of the historic environment by: a. Determining applications in accordance with the National Planning Policy Framework the London Plan, and Local Plan policies HE1 (Heritage Assets) and HE2 (Enabling Development) where proposals affect heritage assets. b. Promoting the significance of the heritage assets within the borough which provide important wider social, cultural, economic and environmental benefit. c. Where necessary, support restoration schemes and changes of use where they comply with (a) above and secure the long-term future of the asset. The Council will work with Historic England and relevant stakeholders to identify nationally important Heritage at Risk and, where within the power of the council, to address the issues placing them at risk d. Continuing to identify and review non-designated heritage assets for statutory or local designation e. Ensuring that new development within ~~the~~ locally ~~strategic~~ protected views (as set out within the policies map) does not harm ~~views~~ the significance of heritage assets within those views, for example ~~to~~ St Mary's Church spire and ~~on~~ Harrow on the Hill Conservation Areas ~~and other identified assets~~. f. Supporting developments that improve access to, and the understanding of, a heritage asset where the significance of the asset is conserved and enhanced; B. The deteriorated state of the heritage asset should not be taken into account in any decision where evidenced, neglect of, or damage to, a heritage asset C. Support the integrated management ~~measures to heritage assets to mitigate and adapt to climate change,~~ of the natural and historic environment where this preserves or enhances ~~and nature where appropriate, where these are able to be undertaken sensitively, whilst not harming~~ the significance of both and optimise co-benefits, especially for climate change ~~the heritage asset~~. D. Prior to any development a record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact must be undertaken and made publicly available.	Modification to Part A.e to ensure consistency with national policy and the London Plan, and provide clarity to ensure an effective policy. Modification to Part C to provide clarity to ensure an effective policy.

MM18	Policy HE1 up to para 3.1.21, pp87-92	**Policy HE1: Historic Environment** A Proposals that ~~secure the preservation, conservation~~ preserve or enhance~~ment of~~ a heritage asset's significance (including any contribution made by setting), ~~or which secure opportunities for sustainable enjoyment of the historic environment, whilst avoiding and minimising harm to heritage significance,~~ will be supported. B Proposals should describe the significance of any heritage assets affected by development including any contribution made by the setting. The impact of proposals on the significance of heritage assets will be assessed through a Heritage Impact Assessment: C. The Council will use planning conditions and planning obligations where necessary to deliver heritage related public benefit, in particular increasing understanding and appreciation of assets heritage significance by sharing knowledge gained from investigative work and improving access to heritage sites.' **Designated Heritage Assets** *Conservation Areas* D~~.~~ ~~In addition to (A) and (B) above, w~~When considering proposals within conservation areas, the Council will: a. Support the redevelopment of sites that detract from the significance, character or appearance of the conservation area; and b. Maximise opportunities to restore lost features or introduce new ones that would preserve or enhance the significance, character ~~and~~ or appearance of the conservation area. *Listed Buildings* F. ~~E.~~ ~~In addition to (A) and (B) above, w~~When considering proposals affecting listed buildings and their setting, the Council will: a. Maximise all opportunities to secure the future of listed buildings particularly those on the 'heritage at risk' register. *Scheduled Monuments* G. ~~F.~~ ~~In addition to (A) and (B) above, w~~When considering proposals affecting scheduled monuments, the Council will have regard to: a. The relationship of the monument with other archaeology and the wider landscape in which it should be interpreted; b. The condition and management of the monument; and c. The existing and future security of the monument. H. ~~G.~~ Major development and change of use proposals affecting a scheduled monument will be required to provide and implement a management plan for the monument that explicitly sets out the significance of the monument and how it will be sustained. *Archaeological Assets* I. ~~H.~~ ~~In addition to (A) and (B) above, w~~When considering proposals affecting an archaeological priority area, the Council will have regard to up to date guidance published by Historic England. *Registered Parks and Gardens (including locally listed parks and gardens)* J. ~~I.~~ ~~In addition to (A) and (B) above, w~~When considering proposals affecting the significance of registered and/or locally listed parks and gardens, the Council will: a. Ensure that development does not detract from the significance of the park, garden or landscape (including any contribution made by setting); or prejudice its continued operation or future restoration; b. Maximise all opportunities to restore lost features and/or introduce new ones that would enhance the significance of the park, garden or landscape; and c. Maximise all opportunities to secure the sustainable future of registered and locally listed parks, gardens and landscapes, particularly those on the 'heritage at risk' register.	Modification to Part A to ensure consistency with National Policy and legislation Modification to Part D to delete unnecessary text / cross-referencing, to ensure the effectiveness of the policy. Modification to original Part D.b (new Part E.b) to ensure consistency with national policy Modification to include new Part D.c (to become new E.c) to ensure consistency with national policy and an effective policy Modification to original Part E (new Part F) to delete unnecessary text / cross-referencing to ensure the effectiveness of the policy, and modification to ensure consistency with national policy Modification to original Part F (new Part G) to delete unnecessary text / cross-referencing, to ensure the effectiveness of the policy. Modification to original Part H (new Part I) to delete unnecessary text / cross-referencing, to ensure the effectiveness of the policy. Modification to original Part I (new Part J) to delete unnecessary text / cross-referencing, to ensure the effectiveness of the policy.

Non-Designated Heritage Assets

K. ~~J.~~ The Council will consider the effects on the significance of a non-designated heritage asset. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be taken.

Supporting Text

3.1.1 Collectively and individually heritage assets are a unique, irreplaceable resource to be sustained for the present and future generations to understand and enjoy. When assessing proposals affecting heritage assets, including non-designated heritage assets, priority over other policies in the Local Plan will be afforded to the conservation of the assets affected and their setting as appropriate to the significance of the assets. Heritage Impacts Assessments should be undertaken by a suitably qualified professional and should include the following:

a. Identify and describe the heritage assets potentially affected by the development;
b. analysis the significance (i.e. heritage values) of the heritage assets potentially affected by the development, including any contribution made by setting to that significance;
c. describe the impact of the proposal on that significance;
d. outline a) how to avoid and minimise harm to the significance of impacted heritage assets, and b) any opportunities for enhancing heritage significance.

3.1.2 Public access to the historic environment, such as archaeological assets or historic parks and gardens, can support tourism, education and the wellbeing of residents. The Council therefore recognises that change within the historic environment need not be at odds with heritage protection objectives.

3.1.3 The National Planning Policy Framework (2023) is clear that justification for substantial harm to (or total loss of) the significance of a designated heritage assets should be exceptional, and wholly exceptional in respect of those of highest grading, and that permission should be refused unless certain criteria are met. Proposals involving less than substantial harm to the significance of designated heritage assets are required to be weighed against any public benefits, whilst proposals affecting non designated heritage assets should be subject to balanced judgements concerning the scale of harm and the significance of the asset.

3.1.4 Supplementary planning documents (SPDs) together with accompanying character appraisals and management plans have been published for the Borough's conservation areas. Historic England also produce documents providing guidance on the conservation of heritage assets. The detailed policies and guidance set out in these documents, can provide further material considerations. Further information relating to the significance of these assets such as historic Ordnance Survey maps and the Greater London Historic Environment Record (GLHER) etc can also assist in the understanding of such assets,

3.1.5 Heritage Impact Assessments need to be undertaken by competent experts in line with all relevant national, regional and local guidance[1].

Design & Character

3.1.6 Issues of design, appearance and character are the main considerations for additions and alterations to heritage assets, and new development affecting heritage assets. Replicating a particular style may be less important, though there are circumstances where it would be appropriate. Design should take account of the significance of nearby assets, topography, general character of the area, diversity or uniformity in style of the building and area, construction, materials, detailing, decoration and period of existing buildings and spaces; urban grain; current and historic uses; landscaping; and views (public and private).

3.1.7 The existing or original location and layout of heritage assets can make a significant contribution to their historical context and meaning. Similarly, the original use of a heritage asset will often be the most compatible with its character and fabric. Securing the appropriate and viable use of a heritage asset that is compatible with its character and fabric in the long term is

[1] See for example, the GLA Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets: https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance

		an important part of its conservation. Proposals for below-ground (subterranean) development and modification of internal layouts can also impact upon the significance of heritage assets. 3.1.8 The survival of heritage assets is usually best achieved by ensuring that they are supported by viable economic uses compatible with the character and fabric of the asset which secure their repair and on-going maintenance needs in the long term. Appropriate uses can breathe new life into listed buildings and conservation areas, and support opportunities for people to enjoy historic parks and gardens. ~~***Designated Heritage Assets***~~ *Development within Conservation Areas* 3.1.9 The redevelopment of some sites within conservation areas may offer the opportunity to remove buildings or other features that detract from the character or appearance of the conservation area. Harrow's Conservation Area Supplementary Planning Documents (and their associated character appraisals and management plans) include provisions for redundant buildings, under-utilised sites and other structures/buildings that detract from the character and appearance of the areas concerned. 3.1.10 Some proposals may offer the opportunity to restore lost layouts, views/vistas, landscaping, boundary treatment or other features of significance to the conservation area. Similarly, opportunities may exist through new development to introduce new features. Again, Harrow's Conservation Area Supplementary Planning Documents (and their associated character appraisals and management plans) identify specific opportunities to restore specific features and it is recognised that development may bring unforeseen opportunities for the restoration or creation of new features. A Heritage Impact Assessment must accompany proposals for removal of a feature or for new development within a conservation area. *Listed Buildings* 3.1.11 There are over 300 statutorily listed buildings and over 700 locally listed buildings in Harrow. In numerical terms, therefore, listed buildings constitute the largest component of the Borough's historic environment. Particular care is needed to ensure that alterations, extensions and any other development affecting listed buildings does not prejudice their architectural or historic integrity, including that associated with their setting. 3.1.12 The Council endeavours to ensure that listed building owners are aware of their responsibilities. Statutory powers allow the Council to step in when listed buildings are seriously neglected. However, positive solutions that provides a viable, long-term future for listed buildings and which prevents them becoming 'at risk' are invariably preferable to the use of legal interventions, particularly in respect of buildings on the heritage at risk register ~~(see paragraph 3.25 below)~~. ~~***Non-Designated Heritage Assets***~~ ~~3.1.13 Non-designated heritage assets are locally important assets which can range across a number of assets that include locally listed buildings, locally listed parks and gardens, archaeological priority areas and Local Areas of Special Character (LASC). By reason of the difference in listing, there is a differing level of protection afforded to these assets.~~ ~~3.1.14 Across the borough there are areas of notable value, but do not necessarily achieve Conservation Area status. Notwithstanding this, the contribution they make to the local environment warrants recognition and protection. This is due to their heritage significance as well as their townscape /architecture that is of locally cohesive and well-preserved quality and/or landscape that is of locally distinctive and well-preserved quality. Such areas are designated as Local Areas of Special Character (LASC).~~ *Locally Listed Buildings* 3.1.15 Buildings of local interest in Harrow make a special contribution to the architectural and historic identity of the Borough. By inclusion on the Harrow list, the Council is highlighting their local significance to be taken into consideration when making planning decisions which affect them. Within conservation areas, local listing indicates that the building (or group of buildings)	Modification to delete para 3.1.14 and 3.1.15 as matters set out in each para are addressed elsewhere within the policy and supporting text.

Ref	page/policy/ para	Modification	Reason for Modification
		is of some significance to the character and appearance of the area. Outside of conservation areas, a building's (or group of buildings') inclusion on the local list demonstrates special local architectural or historical significance meriting retention. *~~Archaeological Assets~~ Scheduled Monuments and Non-Designated Archaeological Assets* 3.1.16 Harrow has a rich archaeological heritage. This reflects the geology and topography of the land which attracted early settlers and the Borough's proximity to London, which has dominated trade and governance in Britain since Roman times. The benign nature of the environment and landscape processes in the area has resulted in a legacy of well-preserved archaeological features. However, the greatest threat to archaeological resource has been, and remains, human activity particularly development. 3.1.17 Scheduled Monuments are a statutory designation for remains that are recognised as having national importance and are, therefore, safeguarded for their intrinsic value for the benefit of current and future generations. Scheduled Monuments in Harrow make a significant contribution to the Borough's heritage and are the most important sites of archaeological interest. However, Harrow's archaeological heritage includes some sites of more local significance as well as areas where insufficient evidence exists to justify formal scheduling. Locations within Harrow which are suspected to contain below ground archaeological assets, as advised by Historic England, are designated as Archaeological Priority Areas. 3.1.18 The Council is committed to securing the conservation and understanding of all historic assets including those of archaeological interest. The Borough's Scheduled Monuments and Archaeological Priority Areas are shown on the Harrow Policies Map and further information about them is available via the Council's website. The desirability of preserving a scheduled monument and its setting is a material consideration in the determination of planning applications. The National Planning Policy Framework (2023) establishes a clear presumption against the loss of, or substantial harm to, a scheduled monument and states that any harm to a designated heritage asset, which is less than substantial, must be weighed against the public benefits of the proposal. London Plan Policy HC.1 provides further planning decisions criteria relating to archaeological assets. Locations within Harrow which are suspected to contain below ground archaeological assets, upon the advice of Historic England, are identified on Harrow's proposal map as archaeological priority areas. A number of these are related to features the subject of formal designation as Scheduled Monuments. 3.1.19 Developments where heritage assets of archaeological interest have been identified may be subject to mitigation measures in order to understand the significance of the asset. This might include field investigation or excavation and analysis, dissemination and archiving of results. The Council will also encourage community engagement and involvement in any programme of archaeological work. Any investigation would need to be undertaken in compliance with a written scheme of investigation agreed by GLAAS. All projects in London should comply with relevant Chartered Institute for Archaeologist regulations and guidance, as well as HE's Guidelines for Archaeological Projects in Greater London. Further information is able to be sourced from the Greater London Historic Environment Record (GLHER), which holds information on heritage assets within the borough. *Registered Parks and Gardens and ~~(~~Locally Listed Parks and Gardens~~)~~* 3.1.20 Harrow has 4 registered parks and gardens and 19 locally listed parks and gardens (set out within the policies map). These assets are considered to have historical significance as they reflect the landscaping fashions of the day they were established. Proposals that are located within the setting of a registered park and garden (locally listed also) will need to demonstrate it would not detract or harm their significance.	

Chapter 4 – Housing

Ref	page/ policy/ para(s)	Modification	Reason for Modification
MM19	Policy SP03 pp97-102	**Strategic Policy 03: Meeting Harrow's Housing Needs** **Housing delivery:** 1 The Council will optimise opportunities to deliver a minimum of 16,040 (net) homes during the Plan period (2021/22 – 2040/41), of which at least 8,020 new homes (net) will be delivered between 2019 - 2029 (Policy H1, London Plan), to address the future needs within the most sustainable locations of Borough. Based on current estimates of the Borough housing capacity from all sources, the 10-year housing delivery target will be met. 2 The London Plan (2021) includes a target to deliver a minimum of 3,750[2] (net) homes on small sites (below 0.25ha) across the Borough between 2019 -2029. 3 The Council will support the delivery of new housing on a range of suitable sized sites, prioritising previously developed land, within the following locations: A. **Harrow and Wealdstone Opportunity Area:** A minimum of ~~8,750~~ 8,300 will be delivered through extant permissions and on allocated sites within the opportunity area. B. **Rest of the Borough:** A minimum of ~~3,165~~ 2,500 will be delivered through extant permissions and on allocated sites across the rest of the Borough. C. **Small Sites:** A minimum of ~~4,125~~ 5,250 new homes on small sites (below 0.25ha) will be ~~supported on allocated sites within the Plan and~~ delivered on windfall~~s~~ sites, in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail stations or a Metropolitan, Major, District town centre boundary, providing they are sensitively designed to protect and enhance the character of the Borough, particularly suburban areas. D. Windfall sites: Development of new housing on suitable sites (above 0.25ha), not identified within the Local Plan will be supported, provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development Plan. 4 New development will be directed towards the locations where infrastructure has the most capacity to accommodate new homes, whilst respecting their local distinctiveness, local character and protecting the borough's physical, natural, historic environment, as well as recognising the most accessible locations (PTAL 3-6) of the Borough will change over time. Development within suburban areas that have a low public transport accessibility and limited infrastructure capacity will be of a modest scale and will be required to protect, enhance and re-enforce the unique character of these locations. **Housing Choice** 5 Development will be expected to provide a choice of housing and deliver inclusive, mixed and sustainable communities to address local and strategic housing needs, across the Borough. This will be achieved through; A. **Genuinely Affordable housing:** Over the plan period the Council seek to ensure; at least 50% (8,000) of all new dwellings delivered from all sources of housing supply across the Borough will be genuinely affordable to those in need, based on assessment of local housing costs and incomes, in line with the London Plan. At least 70% of all these will be low cost rented housing and the remainder will be Intermediate products which will be genuinely affordable. B. **Mix of Housing by size:** A strategic target has been set to ensure a minimum ~~2~~35% (4,000) of all new dwellings delivered are three bed (or more) family sized dwellings across the Borough over the plan period. C. ~~**Specialist older people housing**~~ **Accommodation for older people:** a) The housing needs of older people will be met through: i) Prioritising the delivery of new conventional residential accommodation ~~in C3 use class,~~ which is designed to be adaptable to the varying needs of users over their lifetime, as well as via retrofitting ~~the~~ existing stock.	Part 3A and B amended to reflect post hearing housing numbers position. Part 3C amended to ensure it is consistent with the London Plan and to reflect site allocations methodology excluded sites below 0.25 ha. Target updated to reflect the approach to small sites / housing trajectory presented during the examination, to ensure policy is justified. Title of Part 5 C amended, as this relates to both specialist older person housing and care homes Part 5Ca modified to delete Use Classes to ensure a flexible and effective policy.

[2] NB This is a component of the London Plan 10-year housing delivery target of 8020 homes and not addition to this.

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		ii) The delivery of specialist older persons accommodation ~~(C3)~~ with different levels of support, and care home accommodation ~~(C2)~~. ~~These should play a supplementary role to conventional C3 housing that are adaptable to the changing needs over time.~~ iii) The delivery of low-cost rented housing within older person accommodation schemes. b) The Council will work positively with providers~~,~~ to support the delivery of a minimum 980 units of specialist older person accommodation~~, comprising retirement housing units extra care housing units~~ between 2022-32, to address the future needs of an ageing population. c) A total of 200 bed spaces for nursing care will be delivered, to address the needs of the elderly population or those who have serious health issues that require specialist care, between 2022-32. ~~The Council will monitor the supply of additional older person accommodation to address local needs and undertake an updated needs assessment, if necessary:~~ d) Any specialist older person accommodation and care home needs beyond 2032 will be based on the benchmark/need figure included within the future London Plan, unless an updated Local Needs Assessment is undertaken. D. **Supported and specialist accommodation:** The Council will work positively with the relevant authorities such as the NHS and charities, to ensure additional well designed supported and specialist accommodation is delivered, to address the requirements of specific users or groups (particularly marginalised, vulnerable individuals or groups) providing the applicant can demonstrate a need for the proposal. The Council will ~~seek to resist the loss of~~ support improvement and redevelopment of existing accommodation ~~to other uses, unless~~ where the proposal supports an improvement in the overall stock of supported and specialised housing within the borough. ~~is for re-purposed, enhanced or for re-location of the use and it would comply with other policies in the Plan~~. E. Non-self-contained accommodation: The Council will support the provision of non-self-contained housing such as Houses in multiple occupancy (HMOs), Hostels, Large Scale Purpose-Built Shared Living (LSPBSL) or Purpose-Built Student Accommodation (PBSA). This is providing: a. A need is demonstrated for PBSA, LSPBSL products and the proposal is not situated on a site that has extant permission or is allocated for self-contained housing b. Proposals make a positive contribution to housing choice and create mixed and ~~balanced~~ inclusive communities. c. The level of non-self-contained housing provided does not result in an over concentration of such uses, result in harmful amenity impacts and compromise the delivery of additional self-contained housing to meet the future Borough needs and support mixed inclusive communities. F. **Self-build and custom build housing:** The Council will support proposals, for self-build and Custom build housing, particularly community led schemes, to diversify sources of housing supply, speed up housing delivery, encourage innovate design and further housing choice to address local needs. Such developments will need to demonstrate compliance with relevant policies of the Development Plan, particularly in relation to the provision of affordable and family sized housing**.** G. **Build to rent:** Built to rent proposals will be supported within the Opportunity Area, Edgware Major Centre and District Town Centres. This is providing proposals (i) comply with definition and requirements of London Plan Policy H11 (ii) Support high quality design that protects, respects the Borough's character areas in line with SP1 and GR1. (iii) Support balanced, mixed and inclusive communities H. **Gypsy and Traveller accommodation:** The Council will maintain the existing provision of Gypsy and Traveller pitches. A total of ~~twelve~~ thirteen additional pitches will be delivered between 2022-32 on the Watling Farm site. ~~The existing identified needs, and if any additional needs arise, will be addressed within an existing site~~.[3] Any pitch needs beyond 2032, will be based on any need figure included within the London Plan or an updated accommodation needs assessment.	Part 5Cb amended as a range of products fall within the definition of specialist older person accommodation , to ensure it is positively prepared and effective. Part 5Cc deleted text as this is not required for soundness / effectiveness. Part 5Cd added as a new criteria; to ensure the policy is positively prepared and effective in terms of meeting future older person accommodation needs over the Plan. Part D amended to reduce duplication / cross-referencing within the plan to ensure the effectiveness of the policy. Modified also so make the policy positively prepared. Amendment to Part 5Eb for consistency in terminology within the plan, so that the policy is effective. Part H amended to reflect the latest provisional outcomes of the Draft GLA Greater London GTANA to ensure the policy is justified. It also ensures the policy is positively prepared and effective in terms of meeting pitch needs over the full Plan period.

[3] NB. This is based on the provisional findings of the GLA Gypsy and Traveller accommodation needs assessment (GTANA) for the Greater London area. The final GTANA document is expected to be published by the end of ~~**2024**~~ **2025** and the Borough pitch need figures may be subject to change.

Ref	page/ policy/ para(s)	Modification	Reason for Modification
		Estate regeneration 6. The Council will positively work with local communities, existing residents, and other stakeholders to support opportunities that arise for estate renewal and regeneration during the Plan period. This will play an important role to: a. Increase the provision of the right type., size, tenure of housing to address local needs and meet the strategic targets b. Ensure residents have access to additional high quality affordable and family sized dwellings to adequately address the needs of existing and future residents c. Address the causes and impacts of multiple deprivation within them and wider areas (where relevant to the proposed scheme) ~~d. Ensure neighbourhoods and communities benefit from living within high quality environments, with access to communal and other facilities within the estates (if necessary) or wider area, as well as are well designed, safe, inclusive and promote the health and well- being of communities.~~ ~~e. Ensure existing and new residential units achieve high quality design standards~~ f. Promote social interaction, cohesion between the residents to support mixed and inclusive communities. g. Ensure residential accommodation and other facilities are maintained at a decent high-quality standard throughout their life ~~7. The Council will work with a range of stakeholders to support the delivery of phases 2 and 3 of the Grange Farm Estate regeneration scheme during the life of the Plan. This will deliver an exemplary mixed tenure community, with new residential accommodation built to high quality design and Development Plan housing standards, with a range of housing types and tenures, sizes to address the needs of existing and future residents, particularly for families and local income households who require social rented housing.~~ **Safeguarding the existing housing stock** ~~8.~~ 7. Existing self-contained C3 housing will be safeguarded in accordance with London Plan policy. Exceptionally, the net loss of self-contained residential accommodation may be acceptable where: A. Sub-standard dwellings would be brought in line with London Plan space standards; B. The proposal is for specialist non-self-contained accommodation (use class C2) to meet an identified local need in accordance with the requirements of Local Plan policy H8; C. De-conversion of flats would create a family size home (3 bed or more) D. Providing social or physical infrastructure to meet an identified local need which could otherwise not be met elsewhere. E. The net loss of existing affordable housing units and floorspace – overall and in terms of social rented housing – will be resisted. F. A change of use from housing to short-stay holiday rental accommodation to be used for more than 90 days a year will be resisted. ~~Implementation:~~ ~~9. The Council will monitor the implementation of the Plan against the above targets, including through the use of the housing trajectory (Appendix 6) and the monitoring implementation framework (Appendix 2), to address future housing needs and maintain a five-land supply of deliverable sites.~~	Part 6d and e deleted to reduce the duplication between these and policies SP1, GR1, GR2, to ensure the effectiveness of the Plan. Part 7 is deleted to reduce the duplication in text between and Policy HO5 and site allocation 04, to ensure the effectiveness of the Plan. Part 9 of the Policy is deleted, as the inclusion of this text is unnecessary for its implementation.
		Supporting Text: *Housing needs and requirement* 4.0.1 The Draft Local Plan proposes to adopt a housing requirement/target of 16,040 homes between 2021-41 (being the annualised London Plan target of 802 homes per year over the 20-year plan period), in compliance with the London Plan. The proposed target includes self-contained residential units and non-self-contained residential accommodation, including specialist housing for students and older people ~~in use classes C2, C3 and C4 or sui generis~~. 4.0.2 It should be noted that the NPPF requires Local Plans to cover a period of 15 years from the date of adoption. It is good practice to produce a Plan covering more than 10 years, as there can be time lag in the delivery of large strategic sites and	

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their supporting infrastructure due to factors such as gaining planning permission, market conditions, access to finance and viability. Therefore, as the Plan is expected to be adopted in 2025, the Plan is proposed to cover a period between 2021-41 (i.e. 15/16 years upon adoption).

~~Table H1: Indicative Borough housing supply relative to requirement~~

<table>
<tr><th></th><th>~~Totals~~</th></tr>
<tr><td>~~Local Plan Housing requirement (2021-41)~~</td><td>~~16,040~~</td></tr>
<tr><td>~~Housing supply:~~</td><td></td></tr>
<tr><td>~~Total capacity of sites under construction, excluding proposed allocations (at end of 31/03/24)~~</td><td>~~1,053~~</td></tr>
<tr><td>~~Total capacity of sites with permissions, excluding proposed allocations (at end of 31/03/24) (includes 4 net loss non-conventional pipeline)~~</td><td>~~535~~</td></tr>
<tr><td>~~Estimated indicative capacity of proposed site allocations~~</td><td>~~8,882~~</td></tr>
<tr><td>~~Capacity of small sites windfall allowance (SSWA) (London Plan H2 target).[4]~~</td><td>~~4,125[5]~~</td></tr>
<tr><td>~~Capacity of housing sites completed between financial years 2021/22 and 2023/24[6]~~</td><td>~~1,924~~</td></tr>
<tr><td>~~Surplus housing delivered between financial years 2019/20 and 2020/21 (relative to London Plan target of 1,604)~~</td><td>~~454[7]~~</td></tr>
<tr><td>~~Supply Total:~~</td><td>~~16,973~~</td></tr>
<tr><td>~~Indicative shortfall surplus/shortfall in supply relative to 20-year housing requirement~~</td><td>~~+ 933 (surplus)~~</td></tr>
<tr><td>~~Buffer against the housing requirement~~</td><td>~~5.8%~~</td></tr>
</table>

4.0.3 The housing trajectory set out in Chapter 11 ~~table above shows a snapshot in time~~ (based on ~~provisional housing~~ monitoring data as at 31/03/24) ~~of the potential~~ sets out Harrow's housing supply ~~and capacity~~ from a range of sources:~~,~~ ~~such as~~ completions 2021-2024 (1,929) existing planning permissions on unallocated sites (1,484 (after applying a 17% historical lapse rate to unimplemented small site permissions), ~~sites under construction, completions (within proposed plan period), and~~ a small sites assumption (5,250 2027-2041), and site allocations (8,666 units), totalling 17,329 new homes 2021-2041. ~~that was based on design led work (in line with the Mayors London Plan guidance) and those with extant permission. The proposed site allocations comprise of; new site submissions received through the call for sites or local plan consultation processes, existing allocations carried forward into the new Plan and Council owned strategic regeneration sites. The details of these are included Policy GR12: Site Allocations and site allocation templates are included in Chapter 11. In line with the London Plan and NPPF (para 72), a small sites windfall allowance (SSWA) is included for Plan period, as such sites / windfalls can contribute to the anticipated future supply of housing to meet future needs. The SSWA of 4,125 assumes a total of 375 homes per annum will be delivered on small sites over a eleven -year period based on the target included within Policy H2 of the London Plan (2021).~~

4.0.4 ~~In terms of the London Plan ten-year housing target of 8,020 homes (between 2019 and 2029), since 2019, the Council has delivered a total of 3,982 homes during this five -year period at an average of 796 homes per annum (based on the Council's own internal monitoring systems). Sites currently under construction or with permission total 1,588 homes (comprising 1,053, and 535 respectively) excluding capacity of sites proposed for allocations, to avoid double counting (i.e. circa 2400 homes).~~
</td><td>Table H1 has been deleted as it largely replicates information in Chapter 11. Paras 4.0.3 - 4.0.5 are amended, to ensure the policy is justified, positively prepared and effective, by reflecting the latest evidence base.

Para 4.0.6 and 4.0.7 added based on text that was moved from the supporting text of policy H06. This ensures the policy (a</td></tr>
</table>

[4] The SSWA is applied from the date the Plan is expected to be adopted (2025) less 5 years (11 years)
[5] This applies a SSWA of 375 homes per annum (x11 years) based on the target included within the London Plan Policy H2
[6] Comprising 537, 643, and 730 homes that were completed over these three years
[7] A total of 2,058 homes (1256 and 802 homes respectively) were delivered in the first two years of the London Plan 10-year housing target but before the Local Plan period. The London Plan target for these two years was 1,604, resulting in an overprovision of 454 homes to be carried forward into the Local Plan period.

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		~~Adding these figures to the 3,982 homes already completed gives a total of 7,970 dwellings, which means the Council is making good progress to meet the London Plan ten-year target (2019-2029) of 8,020 homes~~. 4.0.5 ~~Furthermore, design~~ Design-led capacity and other evidence has been undertaken to optimise site capacity of the proposed allocations within the most appropriate locations of the Borough, to meet the future housing needs of the area. This considered factors such as the location of the site, local character areas and other relevant development constraints, to meet future needs. This indicates that the proposed site allocations, some of which have extant permission or under construction have an estimated capacity to deliver circa ~~8,900~~ 8,200 homes. The means that the currently identified supply totals 16,829 ~~16,973~~ homes for the plan period, which means the proposed Local Plan site allocations have a potential capacity to meet or exceed the housing requirement of 16,040 homes over the plan period. This provides a buffer of circa ~~5.8~~ 4.9% of housing supply against the housing requirement, to ensure choice, competition between site developers in order to maintain sufficient supply of deliverable sites to meet local needs and mitigate against a future housing market downturn. The Council will continue to work positively with a range of stakeholders to identify the most appropriate sites for allocations, assess their housing capacity and ensure they are deliverable to address the future needs over the Plan period and promote sustainable development. In line with the National Planning Policy Framework, a Local Plan Viability Assessment has been undertaken to assess the potential impact of the proposed affordable housing, other policy requirements and Community Infrastructure Levy on the deliverability of the Local Plan. This indicates the proposed housing allocations identified in the Local Plan are broadly viable and deliverable, particularly within the Opportunity Area that has achieved higher sales values in recent years. 4.0.6 The London Plan (2021) Policy H13 sets the Borough an annual benchmark target to provide 165 units per annum (or total of 1,980) of accommodation for older people between 2017-29 (12 years). This equivalent of 2300 units older people units over a 15-year period and 3,300 units over 20 years (2021-41). However, the Local Housing Needs Assessment (LHNA, 2024) indicates this benchmark figure does not take account of the anticipated lower rate of forecasted increase in the older population, after 2029 and may have been overstated the level of need. The Council will monitor need, supply, pipeline of older people accommodation during the Plan period, and will consider updating the evidence (if necessary). **4.0.7** The Council commissioned Housing Learning Improvement Network (LIN) to undertake an assessment (2022) of the future need, for housing and supported accommodation for older people and adults who have care/support needs, including those eligible for care from Harrow Council adult social care, covering a period between 2022 -32. The aim of this was to inform the Council's future housing planning, investment and delivery programmes. This indicates a total need to provide 980 units of specialist accommodation for older people between 2022-32 (10 years), comprising of circa 660 units of retirement housing; 320 units of extra care housing. In addition, it noted 30 bed spaces for residential care and 200 bed spaces for nursing care are required to address local needs. Therefore, a large proportion of housing needs of older people would be addressed via the delivery of a higher level of specialist older people housing such as extra care, retirement housing and there is small need to deliver nursing care homes and limited/no need for care homes.	strategic policy) in relation to addressing the housing needs of older persons is positively prepared and effective.
MM20	Policy HO1 Pp103-107	**Policy HO1: Dwelling size mix** A. General housing developments ~~Dwelling size mix priorities~~ 1 All ~~developments~~ proposals for conventional residential developments ~~must~~ should provide a good mix of unit sizes, to adequately address the Borough's housing needs, particularly for families, as well as contribute to and support the creation of inclusive and mixed communities. ~~To achieve this, proposals must apply the following sequential approach to housing priorities:~~ ~~i) Ensure a~~ A minimum of ~~2~~35% of all units within a scheme ~~are~~ should be family sized dwellings (three bedrooms or more). The remaining dwelling size mix will be determined having regard to the following: ~~and a higher proportion will be required on suitable sites~~; ~~ii) having regard to~~:	Heading of Part A1 amended to provide clarity with respect to the application of the part. Amendments to Part A1 to ensure the policy is positively prepared. Parts A1i included in Part A1 as represents the minimum requirement for family size housing, with renumbered Parts A1a-g being the criteria used to determine the

Ref	page/ policy/ para(s)	Modification	Reason for Modification
		a. Need to provide an appropriate mix of dwelling types reflecting the most up to date evidence as set out in the Local Housing Needs Assessment (or successor documents) and local housing register; b. Site size and its physical characteristics (including any identified constraints on the preferred housing mix); c. Location of the site, the surrounding context, character (including town centre location) and the Public Transport Accessibility Levels; d. Need to optimise housing output on previously developed land; e. The range of tenures and the extent to which flexibility around the mix of market units could secure the delivery of additional affordable dwellings; and f. Potential for custom-build and community led schemes. 2 ~~The smallest~~ All 2-bedroom dwellings for both market and affordable homes should provide a minimum of 4 bed spaces in accordance with the minimum internal space standards for new dwellings set out in London Plan Policy D6, to ensure flexibility to the changing circumstances of households and avoid overcrowding.	remaining dwelling size mix. Percentage of family sized dwellings sought increased from 25% to 35% to reflect evidence base. Reference to 'suitable sites' deleted as ineffective. These amendments ensure the policy is effective and reflective of the evidence (justified).
		3 ~~Development that fails to adequately accord with the delivery of the above requirements will be resisted, unless robust evidence demonstrates it would be unsuitable due to site/design considerations or be financially unviable.~~	A2 amended for clarity.
		B. Flatted developments 4 Flatted developments will be required to give the highest priority to the provision of accommodation for families, on the lower floors of the scheme, with direct access to a private garden or communal amenity space. These should be well designed to address the needs of family members who may be disabled or ~~and~~ elderly or may have other mobility requirements. Proposals that fail to meet this requirement ~~will be resisted, unless it can be~~ will need to demonstrate~~d~~ that the scheme would result in an ~~poor-quality~~ acceptable living environment for families~~; based on the above criteria~~.	Part A3 deleted to ensure the policy is positively prepared Part B4 amended to ensure the policy is positively prepared
		C. Housing schemes solely comprising of smaller units 5 Development proposals comprising solely of studios and/or 1 bedroom, 1 person units~~, or those that will result in an overconcentration of 1- or 2-bedroom units on an individual site,~~ will ~~be resisted unless~~ only be supported where it can be suitably demonstrated that the housing provision: a. Is in an area with higher Public Transport Access Levels (i.e. PTAL 3-6); and b. Forms part of a larger development, or is located within an area for which a masterplan has been adopted or endorsed by the Council, which includes provision for a mix of unit sizes, including a reasonable number of family-sized dwellings (3+ bedrooms); or c. Provides for a balance in the mix of unit sizes in the area; or d. Is the only housing format deliverable by reason of site size, site configuration or other development constraints.~~, and where a studio unit is proposed.~~	Part C5 amended to ensure a positively worded policy. Reference to 'overconcentration' is deleted, as this was not defined and therefore not effective.
		6 An exception to the above (5) will apply to proposals for older person accommodation/other types of occupants with specific needs and it can be demonstrated 1-bedroom units is the most appropriate form of accommodation.	Part 5d amended to ensure policy is effective and flexible.
		~~D. Monitoring~~ 7 ~~The Council's dwelling size priorities will be subject to periodic review and updated when new assessments of housing need are commissioned. Through the Annual Monitoring Report (AMR) the Council will set out progress on delivering these priorities and building the right homes for the next generation. The AMR will assist in informing the Council's consideration of dwelling mix on a site-by-site basis.~~	Part D7 is deleted, as the inclusion of this text is unnecessary with respect to soundness and implementation of the plan.
		Supporting Text: 4.1.1 Development proposals for new housing will need to demonstrate the proposed size and mix of housing will meet the diverse needs of existing and future households, as well as contribute to and support inclusive and mixed communities. This policy	

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		seeks to increase the delivery of new housing through optimising the capacity of previously developed sites, whilst ensuring the right size, tenure and type of housing is delivered in the most appropriate locations. This will help address the needs of the anticipated increase in the population, households and the corresponding demographic changes during the plan period (2021-41). The strategic priority of the Local Plan is to increase the delivery of family accommodation to adequately address local needs. The London Plan (2021) defines family housing as "a dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally having three, four, five or more bedrooms". 4.1.2 The key challenge for the Plan is to increase the delivery of family housing that generally tends to be developed at a lower density, whilst balancing this with the requirement to meet London Plan housing targets where a significant proportion of dwellings are assumed to be smaller dwellings. In terms of smaller sized units, the priority is to provide a higher proportion of two bed units, capable of accommodating four bed spaces, to provide more affordable housing options for other households (e.g. young and retired couples, families with young children and smaller sized households) that are more flexible to their changing circumstances within the most accessible locations of the Borough. These will also help reduce overcrowding issues within the existing stock of one bed units and help release under occupied family housing. 4.1.3 The 2021 census indicates the number of households increased by 6.3% (circa 5332) to a total of 89,600 units between 2011-21. During this period, larger sized households of 4 or more persons (i.e. 40% of total increase), families with children (58% of total increase) experienced significant growth and other households (including multi generation) increased by 10%. Further, 7 person (52%/430) and 8 person households (156%/912) experienced a significant level of growth, which means there has been a rise in multi generation households residing in a single unit or over-crowded housing (i.e. 14.4% of households) due to affordability of housing or the lack of availability of suitable family sized accommodation. In contrast, the Census indicates that the stock of terraced, detached and semi-detached housing declined by 3% (1541 units) between 2011-21, whilst purpose-built flats (including bedsits) increased by 17% (4495 units). Due to this, the number of one bed and two bed units have significantly increased (i.e. 17%, 6% or 1727, 1259 units, retrospectively) and three bed dwellings have declined by 7% (2631) units. Therefore, there is currently an imbalance between the demand/need and the supply for family sized housing (3 bedrooms or more). 4.1.4 The Mayor's Strategic Housing Market Assessment (2017) highlights that one bed units are the largest requirement for market and affordable housing in London (i.e. third of need between 2016-41), based on a model that assumed that any single person or couple aged over 25 years who wish to occupy their own property will do so, irrespective of whether they can afford to do so or not (Draft LHNA, 2022). In contrast, the Council has undertaken a Draft Local Housing Needs Assessment (LHNA, 2022) to gain an understanding of the required future housing and tenure mix to meet future needs. The key findings are; families with children are expected to experience the greatest increase from all household types and account for circa 25% (3600) of the growth in households between 2021-41. Other households which include multi person households are expected to increase by 36% (2800), which is largely driven by multi generation households with older persons living with their family. Couples without children are likely to see significant growth (31%,9300), but this is largely driven by older (55-64 age group +24% of increase, 2270) and the retirement age (65-85. Age group, +7400), whilst the working age groups (25-54) will see an overall net decline of 400 people. Whilst single person households between the 15-64 age groups are expected to see an overall decline of 23% (2000) and the only groups in this category that experience an increase 75-84 and 85+ retirement ages households. 4.1.5 The LHNA estimated the future housing size mix by tenure to address future needs, which will be updated periodically when new LHNA's are commissioned. This will be used to inform a residential development's size mix particularly in terms of affordable homes provision. Where developments are providing affordable housing however, the council encourages early engagement as there may be specific needs in that area that are a greater priority to address. The LHNA indicates there is a significant level of need to increase the delivery of family sized housing (i.e. 3 bed or more), as part of any housing mix. For market housing, there is a high priority to increase the delivery of family sized housing, medium priority to delivery two bed units and a lower priority to deliver smaller sized units (1 bed or studio units).	

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		4.1.6 The LHNA indicates the future need for the size mix for affordable housing is more varied (than market housing) to ensure this addresses the needs and remains affordable for households with a range of incomes. Within social rented and London living rented housing there is a lack of need for one bed units due to the significant over- crowding in the existing stock, a high priority to deliver 3 bed social rented and a medium priority to deliver two bed housing as they provide more flexibility to changing circumstances of households. Within Affordable home ownership accommodation, there is a high level of priority to deliver two bed units, followed by one bed units and a low priority to deliver larger three bed or more units due to affordability constraints of households. Although the priority is to increase the delivery of affordable family housing, a range of factors will be considered to determine an appropriate size mix of affordable housing products on a site-by-site basis. This includes; the site size, location, character of the area the need to maximise the delivery of affordable housing on site, viability as well as level of local need for specific sized housing based on the housing register.	
		4.1.7 Given the significant need for family housing in the affordable and market tenures, the policy requires developers to ensure a minimum of 3~~2~~5% of all dwellings delivered on site are three bed (or more) units. ~~and a higher proportion than this are delivered on suitable sites~~ ~~to address the housing needs of families.~~ The dwelling size mix ~~of the remaining units within the scheme~~ will be determined on a case-by-case basis, based on consideration of a range of factors such as the site size, physical characteristics, location, the need to optimise housing output and deliver affordable housing. Proposals that fail to comply with the requirements of this policy in relation to delivering an appropriate dwelling size mix will be resisted, unless this supported by robust evidence. The Local Plan Viability Study Update ~~(2024)~~ has indicated it is broadly viable for residential schemes to ~~ensure~~ require a minimum 3~~2~~5% of total units delivered are three bed (or more).	Amended to align with policy modification.
		4.1.8 The above approach will help ensure an appropriate balance is achieved between a competing set of factors, such as; increasing the delivery of housing to fully address the future housing needs of the area (particularly families) by optimising the housing output of sites, the need to take account of the site size, constraints, location, character of the area and viability. In addition, there is a low priority to deliver one bed and two bed market housing because the number of single person households of working age are expected to decline, couple households without are not expected to increase and the overcrowding of the existing stock.	Para 4.1.7 is amended to align with the changes to the policy, as well as ensure implementation of the policy is effective and reflective of the evidence (justified).
		4.1.9 To help secure inclusive and mixed communities, there is a need to promote a more varied size mix in future housing developments, to avoid the oversupply and concentration of smaller housing units, overcrowded housing, increasing flexibility of housing for the changing circumstances of households, as well as increase the potential to deliver three bed or more units on suitable sites and locations. The key measures that are proposed to help achieve this are outlined below.	
		4.1.10 The Council will ~~resist~~ generally not support development proposals that comprise solely of studios and 1 bedroom, 1 person units ~~or developments that will result in an overconcentration of 1- or 2-bedroom units~~ that may impact the size range of units delivered on a site or local area and ability to deliver mixed and inclusive neighbourhoods. London Plan policy H10 (Housing size mix) makes clear that developments with a higher proportion of 1- and 2-bedroom units are generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. This policy is considered to provide sufficient flexibility to respond to individual site circumstances. For example, in situations where there are site development constraints or where proposals for such provision would demonstrably enhance the mix and balance of housing unit types within a larger development site or local area. In addition, it acknowledges that there may be instances where 1 bedroom unit schemes may be required to address the needs for older people. Studio units and 1 bed/1 person units intended for single person occupation are not considered to provide a long-term, sustainable solution to meeting local housing need.	Para 4.1.10 is amended to reflect modifications to the policy to ensure it is positively prepared.
		4.1.11 The Council will require well designed two-bedroom properties to be capable of accommodating 4 bedspaces (in line with the London Plan Internal Space standards), to ensure flexibility to changing circumstances of households, reduce overcrowding and help address the needs of families who are unable to access or afford suitable three bed units. Further, applicants will be required to demonstrate the proposed design, layout and sizes of rooms ensures flexibility to the changing circumstances of households, particularly for families. Therefore, proposals will be required to ensure the living area for a	

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		two-bedroom property can potentially be used for a third bedroom and the kitchen area for both preparing food and a living /lounging room area, if household circumstances change, in line with the internal space standards of the London Plan. The benefits of this are; it will reduce the risk of overcrowded housing and the demand pressure on the existing stock of family housing, encourage the efficient use of resources, reduce waste, promote the circular economy and help achieve the net zero carbon target. 4.1.12 Flatted schemes will be required to provide family accommodation on the lower floors, with access to private gardens or communal outdoor amenity space. In addition, these should be well designed for the use of family members who may be elderly or have a physical disability, sensory health issues (i.e. light, noise) or suffer from autism. In addition, it will be important to ensure; new flatted residential developments and proposals for the conversion/re-development of family housing into smaller units (with the re-provision of a family sized unit); are well designed at the outset, to meet the needs of a range of users, particularly families and children. For example, proposal must ensure a sufficient quality and quantity of amenity space is provided; including communal areas within flatted schemes, where families can congregate and interact with one another (on appropriate sites). Further, proposals should incorporate measures to ensure the design, layout is family and child friendly, such as including extra storage space for push chairs, bikes etc in suitable locations near accesses of the schemes, as well as ensure natural surveillance and safety of children and other users.	Additional Supporting Text to provide context to Part A of the policy with respect to design considerations and scope for exceeding the minimum requirement for family size housing, to ensure the effectiveness of the policy.
MM21	Policy HO2 Pp108-110 Up to Para 4.2.3	**Policy HO2: Conversion and redevelopment of dwellings** 1. To effectively manage housing growth and ensure that residential conversions into multiple homes do not have a detrimental impact on the character, stock of family sized housing and amenity of local areas; permission will only be granted for proposals for the conversion of family sized homes into smaller self-contained residential units (C3) where the criteria below are met: a. The internal floor area of the existing dwelling should exceed 130m² (as originally built) or could be accepted to be extended to this size; where 2 self-contained residential units or more are proposed. b. The conversion should provide at least one family sized home with a gross internal floor area of at least 74 m² and be capable of providing a 3-bedroom, 4-person dwelling on the ground floor or if this is not possible on the upper floor(s); with access to a dedicated rear garden of the converted home. c. The site is within an area of PTAL 3-6. 2. Proposals will be required to: a. Comply with the minimum internal space standards of the London Plan b. Ensure the converted flat on the ground floor is well designed to adequately meet the needs of a range of future residents, particularly older persons and those with physical disabilities. c. Achieve configurations that are practical and fit for purpose, having regard to circulation, storage space, room size and shape and relationship with other homes; d. Ensure homes are dual aspect and that all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise; e. Make adequate arrangements for the provision of amenity space for future occupiers of the development; via the subdivision of this, to enable satisfactory access to a private space for each unit. In exceptional circumstances, the provisional of high quality well designed communal amenity space may be acceptable, if it is demonstrated; (i) the subdivision of amenity space would be unsuitable due to site constraints; (ii) there will be adequate privacy safeguards for ground floor occupants and (ii) robust arrangements for long term their management and maintenance.	

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		f. Make adequate arrangements for the storage and collection of waste and recycling material generated by future occupiers of the development which does not give rise to harm to; the character, amenity of the area; and for future and neighbouring occupiers; g. Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retain a single door to the front elevation of dwellings in residential areas; h. Demonstrate adequate measures are taken to increase the level of and enhance soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) and limit the need for hard landscaping areas, to ensure proposals do not detract from the appearance of the property or the street scene, as well as support urban greening and net gains in biodiversity; i. ~~Make adequate provision for parking (~~ Ensure any car parking is provided in line with Policy M2) and safe access to and within the site and not lead to any material increase in substandard vehicular access; j. Make sufficient provision for well-designed cycle storage, within a safe, accessible location. This should not result in the visual clutter of the frontage of the property or street scene and an adverse impact on the areas character; and k. Ensure that levels of external activity would not be detrimental to residential amenity and character. l. Demonstrates compliance with any relevant supporting guidance 3. Proposals for extensions and alterations to converted houses and other residential premises will be supported having regard to the above criteria. 4. Proposals that would lead to an over intensive conversion, redevelopment or which would compromise any component of this policy, will be refused. 5. The Council will also apply the above criteria to any proposals for the demolition and redevelopment of an existing home to provide two dwellings. and the housing mix policy will apply to proposals that will result in three (or more) residential units	Part 2i is amended, to ensure the policy is consistent with the London Plan.
		Supporting Text:	
		4.2.1 The ~~Draft~~ Local Housing needs assessment (2024) indicates there is a high priority to increase the provision of family housing (3 bedroom or more) to address the needs of existing and future households in the area (i.e. families with children, multi generation families), reduce overcrowding, and provide housing options that are affordable and suitable for younger families and lower income households. Further, the area is anticipated to experience an ageing population and this policy will help address the potential increase in the under occupation of existing dwellings, as well as enable families to live within proximity to one another and take care of elderly or younger members. A significant proportion of proposed housing growth is anticipated to be accommodated within the Harrow & Wealdstone Opportunity Area and close to/within town centres, stations which may impact the scope to deliver additional family sized dwellings and replace the loss of the existing stock. In addition, it is also important policies encourage the delivery of high quality and well-designed dwellings.	Factual update
		4.2.2 This policy sets out an approach to determine proposals to convert large family housing into multiple flats and seeks to restrict the loss of them via the re-provision of a minimum three bed flats. It sets the considerations for assessing proposals and aims to address the multiple issues facing the area (noted above), whilst achieving a balance between the need to maintain the existing stock of family dwellings, increase the delivery of additional housing to meet future needs and affordable housing options via new flats. It also must balance this with concerns from existing residents in relation to the potential issues that can arise from a high concentration of flats from conversion of housing; such as the potential detrimental impact on the character and amenity of a neighbourhood.	
		4.2.3 To manage the existing stock of family size homes better, the Council ~~seeks to~~ requires the conversion of family accommodation into smaller self-contained dwellings to re-provide at least one family size dwelling. On this basis a threshold of above 130m² gross internal floor area (as originally built) has been set as the smallest floorspace allowance that could successfully incorporate two self-contained units respectively. This can consider its potential to extend not yet implemented, or potential extensions which will be consistent with the Council's Residential Design Guide SPD (2010) or its subsequent replacement. A key added advantage of maintaining a stock of smaller family housing (below 130m2) is that this will provide	Amendment for clarification to make the policy more effective.

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		a form of starter units for those on lower income, younger households who experience affordability issues accessing housing in the open market.	
MM22	Chapter 4 Policy HO3 Pp 113-117	**Policy HO3: Optimising the use of small housing sites** 1 Small housing developments (any site below 0.25 hectares) delivering a net addition of self-contained dwellings through the optimal and efficient use of land~~, and in accordance with other relevant the Development Plan Policies~~ will be supported, particularly in areas identified in London Plan Policy H2. ~~where located in the following areas:~~ ~~a. Sites with good public transport accessibility (PTAL 3-6)~~ ~~b. Sites within 800m of tube or rail stations~~ ~~c. Sites within 800m of a Metropolitan, Major and District Town Centre boundary~~ ~~2. Any incremental change in character arising from the development of small sites in locations set out under Part 1 should reflect the opportunities identified in the Harrow Characterisation Study and Tall Building (2021) or subsequent versions.~~ ~~3.~~ 2. Proposals on small sites ~~(including those outside of the locations set out under Part 1) shall: shall~~ should: a. Demonstrate a character- and design-led approach by setting out how the proposed development considers the existing context, assessing the site and surrounds for the sensitivity to change, b. Ensure compliance with the requirements of Policy GR1 in terms of its design and layout, residential amenity and hard/soft landscaping, etc c. Protect and enhance biodiversity and green infrastructure, and further maximise opportunities for urban greening; d. Ensure ~~sufficient parking (~~ any car parking is provided in line with Policy M2~~) is provided on site~~ to avoid the risk of harm to safe operation of the surrounding highway network and safety of other road users. e. ~~Sites involving residential conversions must be consistent with Policy HO2: Conversion and redevelopment of dwellings.~~ ~~4.~~ 3. Developments that ~~fail to optimise potential housing delivery on a site or prejudice~~ have the potential to contribute to a more comprehensive development, particularly that of a site allocation should demonstrate how delivery will not compromise the remainder of the site~~, will be refused~~. ~~5. The Council will monitor the effectiveness this policy through the Annual Monitoring Report. Contingency measures may be undertaken (if necessary). to address any under delivery during the plan period or through a future review of the Local Plan~~ **Supporting Text:** 4.3.1 The London Plan (Policy H2: Small Sites) sets a strategic priority to increase the rate of housing delivery from small sites (below 0.25ha in size), particularly within outer London. For Harrow it sets small sites target of delivering 3750 additional homes (or 375 units per annum) over a ten year (2019/20 – 2028/29), which is a component of the overall housing target. This figure comprises circa 47% of the London Plan ten-year housing delivery target of 8020 for Harrow. The London Plan and NPPF (2021), require Local Plans to include measures to boost the supply of housing on small and medium sized sites to diversify the sources of housing supply and increase the delivery of housing to address local needs. 4.3.2 The London Plan expects the incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station (tube or rail) or town centre boundary[8], to play an important role in contributing towards the housing targets for small sites. Within these geographical areas incremental intensification is facilitated by Policy H2, providing a design and character led approach is taken, in line with the criteria above, to deliver additional high-quality homes. Proposals	Part 1 of policy is amended to reduce the duplication of text within the London Plan and cross-reference to other policies, in order to ensure the policy is effective. Part 2 is deleted as its inclusion is considered unnecessary for a positively prepared policy. Original Part 3 (renumbered Part 2) amended to ensure more positively prepared. Original Part 3d (renumbered Part 2d) amended to ensure the policy is consistent with the London Plan Part e is deleted, to reduce unnecessary cross reference in policies Original Part 4 (renumbered Part 3) is amended to ensure the policy is positively prepared Original Part 5 is deleted, as the inclusion of this text is unnecessary for its implementation or guide a decision maker.

[8] Metropolitan, Major and district centres

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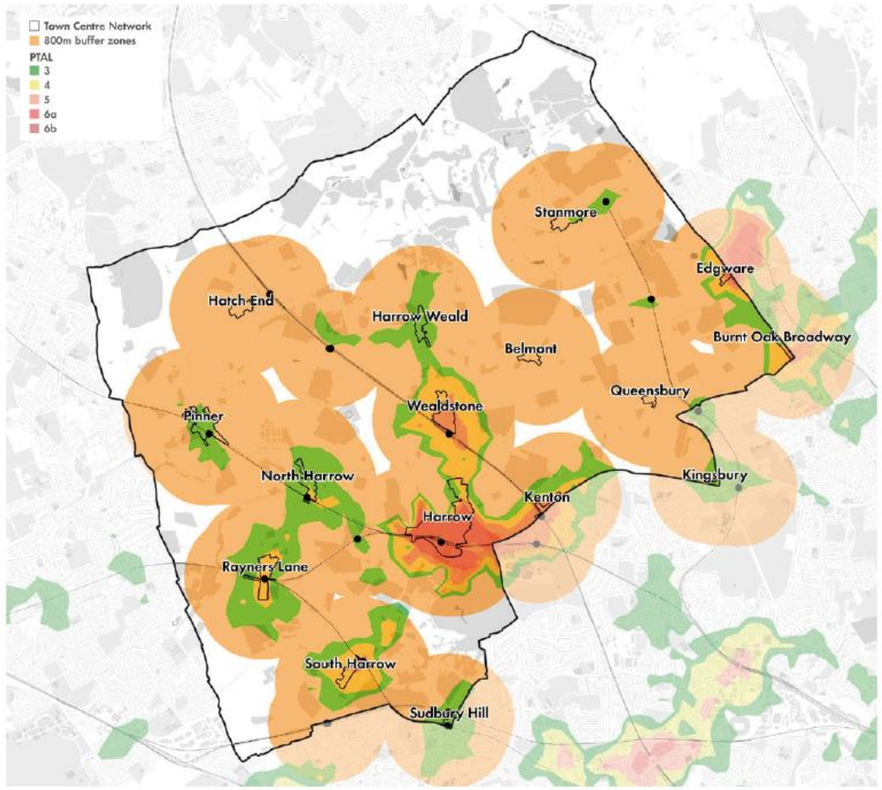
		outside of these locations are less likely to be considered as sustainable and have more potential to cause harm within such locations. However, proposals may still be found acceptable provided they are sensitively designed to protect, enhance and reflect the character of the area and result in no unacceptable impact(s) identified when assessed criteria above and against other policies in this Plan. Specifically, care must be taken to protect the often much lower density suburban form and potential impact to carparking provision required for a site or the wider highway network. 4.3.3 This type of intensification can take a number of forms (as identified in the supporting text to Policy H2), such as: new build, infill development, conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. Proposals will need demonstrate consideration of Policy GR10: Infill and Backland sites, back gardens and amenity areas and ensure compliance with requirements of this. Specifically in relation to residential conversion, policy HO2 Conversion and redevelopment of dwellings will apply, which is an approach considered consistent with para 4.2.8 of the London Plan (2021). A map of the locations that meet the criteria of the small sites policy are shown in the diagram[9] below. **Areas 800 metres from town centre and stations, PTAL3-6b**  Source: Harrow Characterisation and Tall Buildings Study (2021) 4.3.4 The supply of new homes from large and medium sites can fluctuate and increase in some years due to longer lead in and built out rates, associated with gaining planning permission and completing more complex strategic sites. This policy seeks to encourage the development of small sites, to provide a range of different sized housing sites in different locations, diversify	Modification to paragraph 4.3.4 to correct typographical error.

[9] NB: This diagram is based on the old ward boundaries and will be showing the new boundaries in the future Draft Local Plan

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		the sources of housing supply and ensure a steadier supply of housing of sites to address local needs, as well as maintain a five-year supply of deliverable sites. It also seeks to facilitate a wider range of development companies active within Harrow so that development is not contingent on a small number of larger companies progressing a limited number of ~~small~~ sites. 4.3.5 The London Plan expects this Plan to recognise that local character evolves over time. Small sites provide the opportunity for communities to grow organically while maintaining their original character or evolving it incrementally based on a consensual approach. The Harrow Characterisation and Tall building Study (2021) has assessed the potential for growth across the borough, considering the sensitivity to change, to understand the potential development capacity of individual character areas across the borough to both tall and mid-rise buildings and small sites. This provides design guidance for small site developments concerning the context, massing, materials, heritage, frontage, and detailing. This is alongside specific design guidance for each character area, which sets out the relevant strategy, an analysis of existing features and where there are opportunities to improve character. Whilst each individual proposal will be assessed on its merits, the study provides a framework for understanding the character of the borough and its capacity for change. 4.3.6 The open, green quality of the suburban environment was part of Harrow's historical appeal. Over time, intensification of building coverage and hard landscaping, principally to accommodate cars, has reduced incidental green infrastructure. This has not only affected the visual quality of the environment, but has also biodiversity, urban temperatures, air quality, and the volume and speed of surface water run-off, together with water quality. Small site development without some form of safeguards could well intensify these matters. Therefore, the design of proposals should consider urban greening to protect and enhance biodiversity, in line with Policies GI3 Biodiversity and GI4 Urban Greening, Landscaping and Trees. 4.3.7 Proposals should seek to optimise the housing output on small sites, to address local needs, whilst ensuring compliance with other development plan policies relating to high quality design, the protection and enhancement of the local character, minimising any potential amenity impacts on the surrounding area, etc. Further, proposals should ensure the design, layout of their site does not prejudice the comprehensive delivery of adjacent sites or wider area. In addition, proposals will be required to consider any future local guidance that may be produced to increase the provision of well-designed new homes on small sites, such as site specific design briefs, master plans and ~~, in line with the Small Sites~~ Design Codes in line with the London Plan Guidance (2023), to support well designed new homes on small sites. 4.3.8 The London Plan (2021) indicates the small site target can be considered as a reliable source of windfall housing sites and can contribute towards anticipated future housing supply towards meeting the Local Plan housing requirement/target, as well as demonstrating a five-year land supply of deliverable housing sites. Whilst the NPPF 2021 (para 71), emphasises this approach should be supported by compelling evidence to demonstrate that a windfall allowance is a reliable source of housing supply. 4.3.9 The Small Sites Capacity Study (2022) indicates an average of 298 homes per annum were delivered on small sites between 2010-19 within the Borough. This study sought to identify potential development sites below 0.25ha, assess their suitability, availability and their potential capacity for providing new housing, to meet the small sites target. The study concluded the small sites identified as suitable may have a potential capacity to provide between 380 (design led capacity work) and 478 (London Plan Density matrix) additional homes per annum. 4.3.10 Strategic Policy 3 set outs the level of housing anticipated from various sources of supply during the plan period, including a small sites windfall allowance (SSWA) of 375 homes per annum (based on the London Plan small sites target), to assess whether the housing capacity of all sources of potential ~~sources of~~ supply will meet the proposed housing requirement/target. 4.3.11 This policy presents a new strategic approach to meeting housing need locally. The Council ~~We~~ will monitor progress towards the small site housing target through the Annual Monitoring Report and consider this policy's effectiveness through the Local Plan review process. Monitoring will also provide the Council with information to understand the spatial distribution of new small housing development and consider whether interventions are necessary. For example, to ensure those areas where	Para 4.3.7 is amended, to ensure the policy is consistent with the London Plan Modification to paragraph 4.3.10 to correct typographical error. Modification to paragraph 4.3.11 for consistency in referencing the Council.

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		this type of development is concentrated are appropriately supported by community facilities and other strategic infrastructure.	
MM23	Policy HO4 pp118-125 Up to para 4.4.11	**Policy HO4: Genuinely Affordable housing** **Targets** A. Affordable housing will be required to be delivered on site (except for LSPBSL), to promote mixed and inclusive communities, unless exceptional circumstances can be demonstrated (refer to (~~E~~M) below). B. Proposals for major residential and mixed-use development (10 ~~units~~ or more gross units) ~~must~~ should demonstrate they have sought to optimise the housing output on a site and apply the threshold approach included within Policy H5 of the London Plan, to increase the delivery of genuinely affordable housing. Proposals ~~must~~ should ensure an initial minimum of 35% of all gross residential development delivered within a scheme are affordable housing (and comply with criteria of Policy H5 C) to apply for the fast-track route, as well as demonstrate all options have been explored (such as grant funding) to achieve the Boroughwide target of 50% affordable housing, based on habitable rooms or floor space. Public sector land, Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites will all be expected to deliver the threshold level of at least 50 per cent affordable housing on each site. Where a public sector landowner has an agreement with the Mayor to deliver at least 50 per cent across their portfolio of sites, then the 35 per cent threshold should apply to individual sites. C. The following will be considered when assessing the maximum level of genuinely affordable housing that could be delivered: a. The contribution to the Borough's strategic affordable housing target, subject to viability and application of the threshold approach. b. The need to make the most efficient use of land to facilitate and optimise the delivery of affordable housing. c. The proposed tenure mix of the scheme and the need to prioritise the delivery of social rented and affordable family housing, as set out in F ~~in line with the table~~ below. d. Compliance with the requirements of Policy HO1: Dwelling size mix. Proposals should ensure they meet the full range of housing needs, particularly those of low-income households who require family housing. D. Development proposals ~~will carry greater planning benefit, where they~~ should demonstrably deliver the maximum viable amount of genuinely affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy, (Policy H5 of the London Plan). Applicants will then be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Harrow. ~~E. Applicants will then be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Harrow.~~ ~~F.~~ **E.** The affordable housing requirements for major developments will apply in circumstances where development has already been permitted (or is under construction) and 10 or more gross dwellings will be delivered taking into account of the following: a. New residential units that are proposed which would result in an uplift in the overall number of units on the site;	Part A modified to correct typographic error so as to ensure the policy is effective. The first and second sentences of part B are modified to ensure the policy is positively prepared. The second sentence of Part B amended to ensure the policy is consistent with the London Plan. Amended part C, by adding the original criteria Hc of the policy into this part (as new part Cd). This criteria is considered more relevant to determine the appropriate level of affordable housing that could be delivered on a site. This ensures effectiveness of the policy Amended part D by deleting text that refers to proposals being given a greater planning benefit g, to reduce uncertainty for decision maker and ensure it is positively prepared. Additional text added to provide greater clarity with respect to how an increase in affordable housing maybe achieved, in order to improve the effectiveness of the policy. Original Part E deleted as moved into Part D of the policy, to ensure the approach for securing affordable housing is consistent with the London Plan

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		b. Development that is proposed on an adjacent site which by virtue of its layout, design and use is functionally related to the extant permission and would result in an uplift in the overall number of units across the sites; and c. Exception to the above applies, if the applicant demonstrates ownership has changed and no relationship with the original landowner/developer. **Tenure mix (see tenure products definitions in Appendix 1)** ~~G.~~ F. Major residential development will be required to provide a tenure split of 70 per cent low cost rented homes (social rent or as per London Plan Policy H6) and 30 per cent intermediate product homes (London Living Rent or shared ownership), in line with the Local Housing Needs Assessment (or any subsequent updated evidence). The intermediate products should meet the definition of genuinely affordable housing. These must be for households within the most up to date income caps identified in the range for different local income brackets/dwellings within the London Plan Annual Monitoring Report.	Original Part Fc (renumbered to Part Ec) modified to correct a typographical error.
		~~Table: Identified needs by affordable housing tenure~~ ~~Tenure of housing~~ / ~~% required~~ ~~Low cost rented (Social rented or as per London Plan)~~ / ~~70%~~ ~~Intermediate: Shared Ownership and / or London Living Rent~~ / ~~30%~~ ~~Total~~ / ~~100%~~	Table deleted to reduce duplication of text above it.
		~~H.~~ G. The Council will prioritise the delivery of social rented housing over other affordable housing products as this is considered the most genuinely affordable product and the most appropriate to address local needs, when negotiating the tenure mix of schemes. The factors below will be considered, when assessing an appropriate tenure mix: a. The need to prioritise the delivery of a higher proportion of social rented housing in the mix of affordable housing; b. Evidence to demonstrate that the proposed tenure mix will deliver mixed inclusive communities within the locality; ~~c. Compliance with the requirements of Policy HO1: Dwelling size mix. Proposals should ensure they meet the full range of housing needs, particularly those of low-income households who require family housing;~~ ~~d~~c. Evidence of consultation ~~meaningful discussions~~ with Registered Providers ~~which have informed a different tenure, size of units and design to address local priorities and explored funding opportunities and informed the capital value of the affordable housing~~; and ~~e~~d. Evidence to demonstrate a different tenure mix will lead to a higher quantity of affordable housing and provide products that are genuinely affordable for a range of household incomes to address local needs.	Original Part Hc (renumbered to Part G) has been deleted and moved to part C, as this matter is more relevant to determine the appropriate level of affordable housing that could be delivered on a site. This ensures effectiveness of the policy Original Part Hd (renumbered to Gc) amended to provide more clarity for decision maker in relation to determining an appropriate tenure mix and ensure effectiveness.
		~~I.~~ H. The affordable housing provision within Build to Rent developments will be expected to be 100 per cent at Discounted Market Rents at an equivalent rent to London Living Rent or lower. The applicant will need to demonstrate the rents are set at a genuinely affordable rent levels and allocated to those on the waiting list in accordance with a local eligibility criteria.	
		~~J.~~ I. The affordable housing ~~Community-led housing scheme~~ products within community-led housing schemes, may be provided in a different tenure (via prior discussions with the Council), providing it is genuinely affordable and meets identified housing needs.	Original Part J (renumbered Part I) amended to correct minor typographical error
		Viability tested route ~~K.~~ J. Site-specific viability information will need to be justified by the applicant and the Council will determine the weight that should be given to this in decisions, taking account of any exceptional circumstances. Any proposals where site-specific viability evidence is justified ~~must~~ should provide the maximum amount of affordable housing. This should be based on the methodology and assumptions set out London Plan, and the Affordable Housing and Viability LPG. The cost of any independent review must be covered by the applicant.	Original Part K (renumbered Part J) is amended to ensure the policy is positively prepared

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		Review Mechanisms ~~L.~~ K. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal, the use of 'review mechanisms' will be required, where appropriate, and implemented; in accordance with the London Plan and any associated guidance. **Offsite contributions** ~~M.~~ L. To promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision or payment in lieu for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated to the satisfaction of the Council that: a. It is not practical or feasible to provide affordable housing on-site due to site development constraints; and b. where off-site provision is proposed: i. A higher level of affordable housing can be secured through provision on an alternative site; ii. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing; and iii. The provision will better support inclusive and mixed communities. ~~Vacant building Credit~~ ~~N. The application of the Vacant Building Credit (VBC) will be supported, where applicants demonstrate compliance with the criteria below:~~ ~~a. The building is not in use at the time the application is submitted;~~ ~~b. The building is not covered by an extant or recently expired permission;~~ ~~c. The site is not protected for an alternative land use; and~~ ~~d. The building has not been made vacant or abandoned for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.~~ ~~O. The affordable housing policy will apply to any net increase in the floor space of the vacant building.~~ **Mixed and inclusive communities.** ~~P.~~ M. To secure inclusive and mixed neighbourhoods and communities the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, development proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions). ~~Q.~~ N. All new affordable housing developments must be of a high-quality design having regard to other Local Plan policies. The design of the units should be 'tenure neutral' in line with the National Design Guide, so that affordable units are indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity. Where mixed tenure schemes are proposed these must ensure all residents of the development have access to amenities and communal spaces including play spaces. **Supporting Text:** 4.4.1 Similar to the rest of London and England, the housing crisis is having a significant negative social and economic effects on the Harrow resident's standard of living and wellbeing, particularly for the low-income younger households and families. This is demonstrated by the affordability issues households face to buy and rent suitable housing to adequately address their needs. For example, ONS data indicates lower quartile house prices increased from £230k to £390k between 2011 – 22 (70 %) and the annual lower quartile work placed earnings increased from £17,988 - £25,495 (42%) in Harrow. Due to this the lower quartile house prices to annual earnings ratio, which is an important indicator for housing affordability, increased from	Original Parts N and O are deleted as these are not considered necessary and ensure the policy is consistent with national policy

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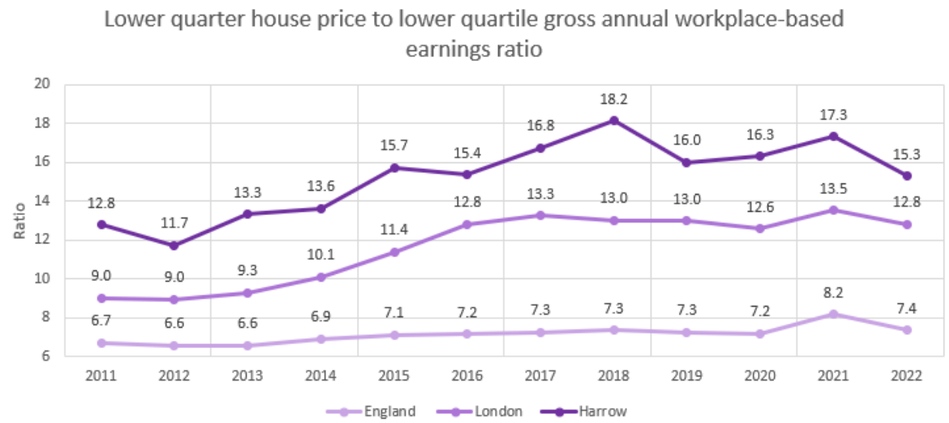
		12.79 to 15.3 (20%) during this period. This means housing affordability has worsened as lower income groups typically spend more than 15 times their work based annual earnings on purchasing a home. 4.4.2 In contrast, the lower quartile weekly rents thresholds for; a room increased by 22.5% from £400 to £490, one bedroom home increased by 33% from £750 to £1000, two bedrooms increased by 34% from £930 to £1,250, three bedrooms increased by 29% from £1,200 to £1550, four bedrooms (or more) by 20% from £1500 – £1800 between 2011/12 – 2021/22 (fig 17, ~~Draft~~ LHNA 2024). Hence, the cost of renting a home is largely unaffordable to lower quartile earning residents, particularly family housing (3b+) within the Borough, without housing benefit, more than on earner or reliance on renting a bedroom within a house or HMO property and availability of affordable housing.  4.4.3 The ~~Draft~~ Local Housing Needs Assessment (LHNA 2024~~2~~) utilised a model to assess the future number of households who will not be able afford to own *or* rent suitable market housing, the quantity of affordable housing, size, tenure of affordable housing; that may be required to address their needs. This indicates an overall housing need to deliver a total of 7,714 affordable homes (or 386 dwelling per annum) between 2021 – 41, which is equivalent of circa 50% of the future Borough housing requirement/target (16,040). This is made of 6549 (85%) homes for those households who are unable to afford to rent or own market housing and 1164 (15%) homes needed for those who aspire to home ownership but cannot afford it. A further breakdown is provided of the tenure products (6549) that may be required to address the future affordable housing needs. This indicates 66% of affordable housing should be social rented (i.e. 3728 +1386), 2% affordable rented housing (164), 16% London Living Rent (1272) and 15% (1164) low-cost home ownership products. In line with London Plan Policy H6, this means circa 70% of affordable housing should be low cost rented products (i.e. social rented/ affordable rented products) and the remainder 30% intermediate housing products. 4.4.4 This LHNA includes an analysis of the weekly housing cost of different 1-4 bed affordable housing products. This indicated that the weekly cost of social rented (e.g. 2b = £126 pw) and affordable rented housing (e.g. 2b = £207) was significantly less than First Homes (e.g.2b = £271) and shared ownership (e.g. 2b = £305) products for all sized units. Further, it included an analysis of the potential income required for 1-4 bed affordable housing products. This indicated a lower income was required for socially rented housing (e.g. 2b = less than £36k) and London living rented housing (e.g. 2b = £36k - £68k) than shared ownership (e.g. £68k -£90k) and First Homes (£53-90k) products for all sized units. This demonstrates social rented housing and London Living rented housing is genuinely more affordable based on local incomes and costs, compared to First homes with a 50% discount and shared ownership products. Proposals will need to demonstrate that intermediate housing products are genuinely affordable to local residents based on an assessment of lower quartiles/median incomes and cost of owning/renting dwellings in the Borough. The LHNA indicates a lower income is required for shared ownership accommodation than First Homes with a 50% discount for family sized accommodation (.i.e. 3b+). In line with the Mayors Practice Note and London Plan (2021) Policy H6, the delivery of First Homes is not considered an appropriate product that	Para 4.4.2: Minor update to text Last part of para 4.4.4 deleted to reduce duplication with national policy

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		is genuinely affordable to address the Boroughs local housing needs. ~~The key reasons are the price of new First Homes, after applying the 30% discount is likely to exceed the £420k price cap of the policy, particularly for family sized units and higher discounts would be unviable. The Government policy requires 25% of all affordable units to be First Homes, which will be contrary to tenure mix of the London Plan Policy (H6) and Local Policy HO4 that seek to prioritise the delivery of genuinely affordable social rented housing and other more affordable intermediate housing products such as London Living Rents that are likely to be displaced.~~ 4.4.5 A significant number of homes are needed to meet Harrow's affordable housing needs of the Borough. The needs outweigh the number of genuinely affordable homes within the necessary tenures (predominantly social rent) that can realistically be delivered over the lifetime of the Plan. This is the case when taking into account both the planning enabling and affordable housing provider funding mechanisms available. National policy requires the council to set affordable housing targets that are realistic, particularly in relation to development viability. 4.4.6 The London Plan, Policy H4 sets the strategic target of 50% for affordable housing. London Plan Policy H5 sets a threshold approach to assessing applications and to follow the fast track approach to delivery (without the need for a viability assessment), proposals must provide a minimum of 35%[10] affordable housing without public subsidy with a 70:30 tenure split agreed with the Council on all land, other than public sector or designated employment land a 50% threshold level for affordable housing applies, unless there is a agreement with the Mayor on a portfolio of public sector sites where 35% threshold applies on individual sites and at least 50% across them. The affordable target is set and assessed on the basis of the percentage of the development's habitable rooms, or if there is a disparity between affordable and private room sizes, the habitable floorspace. Applications that exceed (or meet) the thresholds level of affordable housing on gross units within the scheme will follow the fast-track route and those that fall below this will follow the viability tested route, as set out within Policy H5. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal the use of 'review mechanisms' will be required, where appropriate, and implemented in line with the Mayor's Affordable Housing and Viability SPG. To ensure applicants fully intends to build out the planning consent an early-stage review will be triggered for fast-track schemes if an agreed level of progress is not made within 24 months of gaining permission (or any other period agreed as part of the planning application). Whilst schemes under the viability tested route will be subject to an early-stage review and late-stage review triggered at the point that 75% of homes are sold, or at a point agreed by the Council. In addition, one or more mid-term reviews may be required for larger schemes. 4.4.7 Policy H6 sets out the Mayor's minimum requirements in terms of tenure for 60% of the affordable housing sought. It then requires borough local plans to provide further detail on what the remaining 40% should comprise. Harrow's needs are predominantly for social rent/ London Affordable Rent levels. These are more difficult to deliver as they require the highest amounts of subsidy, either from the public purse or via cross subsidy from market homes for sale/ rent. 4.4.8 The Council is very supportive of the Mayor's long term 50% affordable housing target and the fast-track approach as set out in policy H5 as a tool towards achieving the 50% on all sites in the longer term. The Draft London Affordable Housing Supplementary Planning Guidance (2023) indicates the Mayors strong preference is for the delivery of Social Rent homes, which are best placed to address current housing needs and are eligible for grant funding under the London Affordable Homes Programme (AHP) 2021-26. In relation to its local element of the London Plan tenure split over which it has discretion, the Council will seek to maximise the amount of social rented units that can be delivered on site in non-build to rent schemes. The Council recognises the important role the provision of intermediate affordable housing products can play to address the needs of key workers. The Council may prioritise the allocation of intermediate affordable housing for certain key workers, based on the housing register and other evidence of need. This will be secured via a S106 agreement with developers on a site-by-site basis. The Local Plan Viability Study (2024) indicates that the proposed affordable housing target (assuming a 70: 30 split between Social rented: low cost rented housing, as well as 25% of units are provided as family sized housing) is	

[10] or an increased threshold included in a future London Plan Review

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		broadly deliverable over the Plan period, whilst acknowledging that the fast track approach will be applied to secure the maximum viable proportion and site specific circumstances will be considered on a case by case basis 4.4.9 Consistent with London Plan policy H6, any deviation from the minimum affordable percentage of habitable rooms not consistent with the required tenure mix and other policy requirements consistent with the fast-track approach will need to be fully justified through a policy compliant viability assessment. 4.4.10 Where viability impacts are so great that a reduction in percentage of affordable housing that can be achieved on site is below that required for the fast-track approach, the council will seek to pursue the preferred tenure split set out in policy. It views the delivery of more affordable tenures that would meet needs (social rent and London Affordable Rent) as a greater priority than achieving a potentially higher percentage of affordable housing on site that places greater emphasis on intermediate tenures. Some developers nevertheless seek to increase the overall headline affordable homes percentage delivered on their site above the London Plan threshold levels through the provision of more intermediate tenure dwellings. In these cases, the council will seek a scheme which greater prioritises genuinely affordable rents, even if this results in the overall headline percentage of affordable justifiably reducing. T<u>he Council may consider evidence submitted by applicants that consultation meaningful discussions with Registered Providers demonstrates that a different tenure, size of units and design would be appropriate for their site to address local housing priorities/needs, when negotiating affordable housing. This would need to be based on exploring funding opportunities and be informed the capital value of the affordable housing.</u> 4.4.11 London Plan Policy H11 sets out a requirement for 30% of the affordable dwellings within a build to rent scheme to be at London Living Rent levels. The other 70% is for boroughs to identify, taking account of needs and viability. The Council will seek to achieve 100% London Living Rent equivalents, or lower. Similar to affordable housing delivered from qualifying mainstream housing developments, it will prioritise affordable housing that meets priority needs (cheaper forms of rent) where the fast-track approach is not being pursued. For schemes where affordable is below threshold levels it will as a minimum seek 70% of the affordable provided as London Living Rent equivalent. ~~The Local Plan Viability Study will be undertaken to assess the achievability of this approach~~.	Para 4.4.10 is amended to correspond to changes in original part Hd (renumbered to Part Gd) of the policy and ensure the effectiveness of it. Factual update to the text.
<u>MM24</u>	Policy HO5 Pp126-131 up to para 4.5.13	**Policy HO5: Housing estate renewal and regeneration** 1. Development proposals involving the renewal and regeneration of the Borough's Housing Estates, including any enabling market housing, must be carried out in consultation with existing residents, the local community and other relevant key stakeholders, in line with the London Mayor's Good Practice Guide to Estate Regeneration. Proposals must ensure: A. There is no net loss of affordable housing floorspace, and a) replaces like for like tenure and size; or b) meets the needs of returning residents (subject to a decant strategy); or c) complies with the Council's latest housing needs assessment; and d) the demolition, replacement of affordable housing follows the viability tested route and seeks to provide an uplift in additional affordable housing, in accordance with Policy H8 of the London Plan e) where developments seek to introduce market sale housing to enable the estate regeneration, an~~y further~~ uplift in genuinely affordable housing provision should be made. This should be delivered in accordance with Policy HO4: Genuinely Affordable Housing and Policy H5: Threshold Approach of the London Plan. B. Any affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as low cost rented homes (social rent or as per London Plan Policy H6). C. The tenure of additional affordable housing (other than the replacement provision) should comply with Policy HO4: Genuinely: Affordable housing; prioritising the need to deliver additional social rented housing.	Part 1Ae modified to improve effectiveness and clarity.

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		D. The size of both market and affordable accommodation provided through estate regeneration schemes should be based on the particular needs of both the existing, and prospective future residents. It must consider the requirements of Policy HO1: Dwelling size mix that prioritises the delivery of additional family sized housing. E. All affordable housing products are integrated into the development to ensure mixed, balanced and inclusive communities. F. Ensure a design led approach is undertaken; to achieve the most optimal and efficient use of land. G. A satisfactory quantum of accessible hard and soft landscaping is provided in line with other policies within the Development Plan. H. Where a net loss of external amenity space is proposed, on a case by basis, consideration will be given in relation to; a) The existing quantum/quality of external amenity space b) Proposed quantum/quality of external amenity space c) Other planning benefits arising as a result of the loss of external amenity space d) A sufficient level of play and informal recreation space is provided in line with the approach set out in London Plan policy S4 and Local Plan policy SI2 ~~ies~~ I. Estate regeneration schemes increase permeability and integration into the existing urban built form; improve safety and access for walking, cycling and public transport use to local amenities for residents; improve the public realm within the estate; and create new walking and cycling routes through estates as appropriate. J. Spaces and facilities are provided to enhance opportunities for social interaction, integration to support strong and inclusive communities that encourage physical activity and healthy living ~~K. Compliance with parking standards set out in Policy M2 should apply, unless exceptional local circumstances are demonstrated~~ 2. Proposals for estate renewal, regeneration schemes should be supported by a statement setting out its overall social, economic, environmental, health benefits. 3. Estate regeneration proposals should form comprehensive development schemes, rather than piecemeal proposals. Where only part of an estate is brought forward, it must form part of a wider masterplan. 4. The Council will consider the use of Compulsory Purchase Order powers to facilitate the delivery of a comprehensive regeneration scheme, where appropriate. ~~5. The Council will support proposals for Estate Renewal and Regeneration that demonstrate compliance with above requirements and Policy SP03, including those relating to undertaking a master plan led approach, identifying and addressing location specific issues, and bringing forward a comprehensive scheme.~~	Part 1Hd Amended to include correct policy reference Part 1K deleted to ensure the policy is consistent with the London Plan with respect to minimum car parking standards. Part 5 is deleted as it duplicates requirements of part 3 relating to a master plan and does not aid decision making process.
		Supporting Text: 4.5.1 The Council is committed to ensuring all of Harrow's residents have access to a decent home that is secure and affordable. This will require that significantly more new genuinely affordable housing is made available in the Borough. In addition, it is vital for the safety and security of residents and the wider community that homes are well integrated into their neighbourhoods, with plentiful opportunities for social interaction, and that high quality living environments benefit the health and well-being of local residents. ~~4.5.2 Harrow's council homes were mainly built between 1950 and 1970, as the area was a focus of efforts to tackle shortages of good quality housing following the Second World War, and are concentrated in the Harrow Weald, Roxbourne, Pinner and Stanmore Park wards. There are numerous social housing estates across the Borough. This includes the larger estates at Grange Farm, Mill farm, Rayners Lane and the smaller estates at Woodlands, Cottesmore (Stanmore Park Ward), Headstone~~	Para 4.5.2 – 4.5.5 are deleted as contextual text is not considered necessary to aid decision making.

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		~~and Headstone Lane (Hatch End), Vaughan Road/Butler Avenue and the Honeybun (West Harrow ward), Northolt Road Estates (Harrow on the Hill ward) and Pinner Hill.~~ ~~4.5.3 In line with the previous Core Strategy, the comprehensive renewal and regeneration schemes for Mill farm and Rayners Lane estates has been completed. Whilst the permitted scheme to encourage the regeneration, renewal of the Grange Farm estate is currently being implemented. Grange Farm estate is approximately 4.1ha and consisted of varied housing across the site. However, the predominant housing on site was a known as Restiform housing, which built in the 1990s as temporary accommodation. The building construction typology was of poor quality and was only intended to have a lifespan of 30 years. Through the passage of time, the homes on the site had deteriorated and were extremely inefficient and not fit for purpose. The remainder of the stie comprised of a poorly utilised community centre and the designated open space was of poor quality and not used effectively or efficiently.~~ ~~4.5.4 The Council have commenced the regeneration of the Grange Farm Estate. A hybrid planning application was granted planning permission in 2018, which resulted in approximately 574 new homes being approved on the site, and importantly, affordable homes for the borough including re-providing homes for existing residents of the estate. Works are underway on site currently, with 89 affordable homes in phase 1 being delivered.~~ ~~4.5.5 Phases 2 and 3 will follow and will deliver more housing including affordable homes. All new homes will meet current guidance and requirements in terms of internal space standards, accessibility and energy efficiency. Along with the delivery of new housing on the site a new, larger, fit for purpose community centre will also be provided, set within a much higher quality open space for the benefit of residents and the wider community.~~ 4.5.6 The indices of Multiple Deprivation (2019), indicate there is high levels of deprivation within the Borough estates, particularly Stanmore Park ward that covers the areas of Woodlands and Cottesmore Estates; followed by the Hatch End Ward that covers the Headstone and Headstone Lane Estates. This is related to factors; such as poor standard of housing (i.e. lack central heating or housing that fails to meet decent homes standards relating health, safety), barriers to accessing housing (.i.e. affordability), and services (geographic barriers/physical proximity, overcrowded housing, low incomes effecting children and older people; low levels of employment, health issues (physical/mental) of residents; lack of education attainment/skills.	

Grange Farm Estate Regeneration Scheme

4.5.7 Other key issues that all or some of the estates may be experiencing are:

(a) the housing stock has reached the end of its life and is physically decaying.
(b) families are residing within overcrowded housing.
(c) the stock of social housing is being lost via the Government's right to buy scheme, whilst the opportunities to replenish it are limited in contrast to increasing needs for genuinely affordable housing.
(d) Some of housing stock does not meet decent homes standards.
(e) The housing stock has poor energy efficiency resulting in higher energy bill and "fuel stress".
(f) Some of the estate housing stock may be unsuitable for residents with physical disabilities, older residents and wheelchair users.
(g) The estates suffer from poor quality external space and urban planning such large areas of hard standing areas with no natural surveillance, raising safety concerns. There are areas of left over space between development that are an inefficient use of land.
(h) Lack of /fragmented designated and non-designated open space that is poorly used, accessed and maintained.
(i) Presence of garage courts that are no longer used for their original purpose.
(j) Large areas of hard standing for car parking that are inefficiently used.
(k) Lack of or poor access to community facilities and other facilities (i.e. health) that are important for the wellbeing of residents and supporting healthy, sustainable communities.
(l) Lack of or poor access to public transport (such as buses) serving estates, even though lower income groups are highly dependent on it due toa lack of alternative.

4.5.8 The conditions of housing estates and challenges they face varies and the programme required for these will differ. Some of the older estates may have physical constraints that may limit site or area wide enhancements. For example, their layout, design may make it difficult to introduce new access points and through routes, provide more usable open space. Also fragmented/multiple land ownership may be an issue for bringing sites forward. In other circumstances, options may arise to deliver more affordable housing units on estates, either through incremental infill or comprehensive redevelopment. Accordingly, strategic approaches to estate renewal and regeneration may be necessary in certain circumstances.

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		4.5.9 All development proposals for estate renewal and regeneration must ensure that there is no net loss of affordable housing floorspace, in accordance with other Development Plan policies. Loss of existing affordable housing will only be permitted where it is replaced by equivalent or better-quality accommodation, providing at least an equivalent level of affordable housing floorspace, on an identical or equivalent basis[11]. The use of floorspace (i.e. based on habitable rooms) as the measure for replacement provision provides flexibility for the Council and its partners to better address acute housing needs, such as for more family sized social housing, where redevelopment is undertaken. To achieve no net loss, higher density, including the introduction of market housing may be necessary to increase the viability of schemes and achieve a more mixed and balanced community. This approach is consistent with the London Plan. 4.5.10 Replacement and additional affordable housing should reflect the housing needs of existing and future tenants of the estate, as well as consider the requirements of Policy HO1: Dwelling size mix that prioritise the delivery of additional family sized housing. Schemes should make provision to re-house existing residents, after which the mix of all additional units should reflect the wider housing needs of the borough in all but exceptional cases where a variation can be robustly justified. Existing residents should be rehoused in advance of occupation of new market housing. 4.5.11 Proposals for the renewal and regeneration of the Borough's estates should provide satisfactory levels of hard and landscaping areas within appropriate locations of the scheme. These should comply with other policies relating to satisfactory provision of external amenity/open space, walking, cycling and parking, as well as include measures to reduce surface water run off issues (via SUDS) and support urban greening and net gains in biodiversity. 4.5.12 The Development Plan sets out the quantity and quality of open space (amenity space) that is required to ensure these are accessible and address the future needs of the Borough. However, it may not be always possible to apply these standards, as there is a deficiency in accessible open space provision in certain parts of the Borough. Many of the Borough's estates include designated open space and any proposals for the renewal and regeneration of these should seek to ensure there is no net loss in open space provision, for which there is a presumption against within this Local Plan. ~~4.5.13 To justify the potential net loss of open space provision, in exceptional cases, applicants would need to submit a robust assessment of the existing quantity, quality of open space provision in contrast to the proposed provision and the rationale for the proposed net loss of open space, including other overriding planning benefits of the proposal. This should set out an understanding of the function, quality, benefits, and disadvantages of the existing provision, as well as options that were taken to limit any quantitative loss and why these were not appropriate. Any quantitative loss of open space should result in the delivery of a higher quality open space provision with a range of recreational facilities for children, as well as suitable measures for landscaping and urban greening to support biodiversity.~~	Original Para 4.5.13 is deleted to ensure consistency with national policy.
MM25	Policy HO6 Pp133-140	**Policy HO6: Meeting the housing needs of ~~Accommodation for~~ older people** *Linkages:* *NPPF Chapter 5: Delivering a sufficient supply of homes* *NPPF Chapter 11: Making effective use of land* *London Plan Chapter 3: Design* *London Plan Chapter 4: Housing*	Tile of policy amended to provide clarity on its purpose and to ensure it is effective.

[11] Affordable housing floorspace must be replaced on an identical basis where a tenant has a right to return. Where there is no right of return affordable housing must be replaced on an identical or equivalent basis, i.e. social rented floorspace may be replaced with social rented floorspace or by general needs rented accommodation with rents at levels based on that which has been lost.

Ref	page/ policy/ para(s)	Modification	Reason for Modification
		Policy HO6: Meeting the housing needs of ~~Accommodation for~~ older people 1. Proposals for meeting the housing needs of older people, including Care Homes and specialist ~~C3 and non-C3~~ older ~~peoples residential~~ persons accommodation (including those which contain ~~such as care homes and~~ extra care facilities) will be supported where: A. a) ~~It is demonstrated they~~ it would meet an identified local need, having regard to the objectives and priorities of the Council's housing and commissioning strategies, particularly those that ~~to~~ enable older people to live independently; b) It would deliver specialist older ~~peoples~~ persons accommodation that would contribute to meeting the Local Plan strategic target for specialist older person accommodation ~~c) Affordable housing is provided in line with Policy HO5~~ ~~d) It has adequately considered and addressed all design issues in Part 2 or Part 3~~ ~~e~~c) it provides the necessary level of supervision, management and care/support for the intended occupants, which will be secured in a legal agreement; ~~f~~d) It is ~~easily accessible to public transport (PTAL 3-6), shops, services, community facilities (including health)~~ in an accessible location appropriate to the needs of the intended occupiers ~~g) It contributes to mixed and balanced communities.~~ ~~h) It considers and respond positively to the objectives, priorities of the Council's housing and commissioning strategies~~ ~~2. Extra care proposals will be usually classed as a C3 use. Such proposals must demonstrate the design issues below have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:~~ B. The design of the proposal should have regard to the following: ~~a) The proposal is for provision of self-contained units which address requirements for private internal space;~~ **a)** Provision of appropriate facilities for care where justified, including good quality staff and visitor accommodation and facilities where appropriate; ~~b) There should be an appropriate balance between private residential accommodation and communal space for ancillary uses to the primary use of the site.~~ ~~c) Good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;~~ ~~d) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;~~ ~~e)~~ b) Where ~~A~~ appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided; ~~f)~~ c) Appropriate wheelchair accessibility is provided, including a higher proportion of wheelchair accessible dwellings built to (M4(3)(2)(b)) building regulations standards for specialist older person accommodation products that seek to address the needs of those aged 65+. This will be determined on a site-by-site basis based on factors such as the need to optimise output, viability, site size and other constraints. ~~At least 10 per cent of dwellings meet Building Regulation requirement to 'Wheelchair Adaptable Category M4(3)(2)(a)' standard or, where Harrow Council are responsible for allocating or nominating a person to live in that dwelling, Wheelchair Accessible Category M4(3)(2)(b) as set out in the Approved Document M of the Building Regulations. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'~~ ~~g) A higher proportion of wheelchair accessible dwellings built to (M4(3)(2)(b)) building regulations standards will be required for specialist older person accommodation products that seek to address the needs of those aged 65+. This will be determined on a site-by-site basis based on factors such as the need to optimise output, viability, site size and other constraints.~~ ~~h) Proposals make provisions for a sufficient level, type of private, communal and public amenity spaces and facilities;~~	Part 1 is amended to clarify policy applies to both specialist older homes and care homes. This ensures the policy is positively prepared and effective. Original Part 2 incorporated into Part 1 to address duplication. New sub-parts (A and B) included within Part 1, with part A dealing with general characteristics of a development, and part B addressing detailed criteria relating to design to provide clarity. Original Part 1a (now 1Aa) is amended and amalgamated with original Part 1h, to ensure it is positively prepared. Original Parts 1c, d, and g are removed to reduce repetition within the policy and other policies in order to ensure it is effective. Part 1B a, b, c, d (original 2 a, b, c d) removed to reduce duplication of text within the policy and other policies (e.g. GR1). These criterions are replaced by a consolidated new criteria Ba. This ensure the policy is effective and positively prepared. Part 1Bc (original Part 2f) amended to reduce the duplication of text included within this in relation to wheelchair accessible/adaptable dwelling and London Plan (D7) and Local Plan (GR3a) Policies. Further, original Part 2g has been amalgamated into Part Bc. These changes ensure the policy is effective. Part 2h (original) has been deleted to reduce duplication with London Plan policy

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		~~i)~~ d) The layout and design of communal spaces/facilities should be designed to encourage incidental meeting, interaction and to develop a sense of community; ~~j)~~ e) Demonstrate how the ~~range of~~ type of units and their design will address the needs of people with dementia and / or other long-term health conditions, and be informed by discussions with providers ~~and demonstrate accordance with the Council's commissioning and housing strategies~~ ~~k)~~ f) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off point within 50m of the main entrance in line with policy M2. This must be appropriate for emergency vehicles ~~i)~~ g) Provision of suitable charging points for mobility scooters is included on-site – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings[12] 2. ~~3.~~ Care homes ~~must~~ should additionally demonstrate the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers: a) There is an appropriate balance of private residential space and ancillary space associated with the care required for the use b) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and staff; c) 100% of all habitable rooms and multi-purpose space used by visiting healthcare or other professionals are wheelchair accessible; d) Accommodation is provided in line with relevant design guidance and best practice standards; such as set out by the Care Quality Commission; e) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off within 50m of the main entrance. This must be appropriate for ambulance/minibus drop-off; in line with Policy M2 f) Provision of accessible communal outdoor space including a sensory garden ~~for those who suffer from dementia~~ for use by residents, staff and visitors which is well designed – in terms of its function, layout within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security. g) Adequate level and range of care facilities and support, communal areas/facilities (i.e. dining areas, lounging area, kitchen meal preparation) offered to address the individuals needs of residents on site Redevelopment of older persons housing ~~4.~~ 3. The Council will only support ~~resist~~ development proposals which involve~~s~~ the loss of floorspace in specialist older peoples and care home accommodation where ~~unless~~: a) it can robustly demonstrate that there is a surplus over a long-term of this housing type in Harrow; or b) adequate replacement on-site accommodation will be provided that satisfies Part 1 ~~2~~ or Part 2 ~~3~~; or c) adequate replacement accommodation is provided elsewhere in the borough that satisfies Part 1 ~~2~~ or Part 2 ~~3~~; or d) it can be demonstrated the existing accommodation is unsatisfactory for modern standards or cannot be adopted to meet these to re-provide the use and/or is not fit purpose. **Supporting Text:** 4.6.1 Harrow is expected to experience an ageing population with a significant growth in the older population during the Plan period. The Draft Local Housing Needs Assessment (2022) indicates that households aged 65 + plus are expected to increase by 28% and households aged 75+ are expected by 64% between 2021-41 (table 8). Whilst the ONS 2018 households' projections indicate that the Boroughs, 65+ household population is expected to increase by 21% and 75+ household population 25% between 2022-23. However, it should be emphasised the growth in the older population will require more housing that is suitable for an ageing population, although this is likely to be addressed via retrofitting/adapting	D6 in relation to private and communal amenity space provision. Part 1Be (originally Part 2j) amended to delete duplicate text, to ensure the policy is effective. Part 3 (now Part 2) amended to ensure the policy is positively prepared and effective by linking with the requirements set out in Part 1. Part 3f (now 2f) amended to clarify that sensory garden may also be appropriate for other users, in addition to those with dementia. This ensures policy is more effective Part 4 (now Part 3) amended to ensure the policy is positively prepared Part 4a,b, c amended to ensure correct cross referencing

[12] Accessible design features in specialist older persons housing (london.gov.uk)

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		the existing stock of housing, providing new high-quality housing built to adaptable housing standards, but this will not necessarily increase the need to provide additional specialised older people accommodation. The key reasons are most older people will most likely continue to remain within their house throughout their lives, whilst others may down/right size and it is a common cultural practice for multigeneration households to reside and care for one another in a single dwelling, particularly amongst the ethnic minority groups that form a large part of the Borough population. The Plan seeks to ensure a wide range of high quality and affordable housing options are available to older people. This includes accommodation for those seeking to remain in their homes, downsize from larger homes whilst remaining in the area, or people requiring more tailored, specialist accommodation with elements of support or care. 4.6.2 Local needs for older persons accommodation should be met principally through conventional housing. Where this is a good level of this type of provision available in the Borough there will be less reliance on specialist forms of accommodation (with varying levels of care). All new residential development in the C3 Use Class must therefore be designed to be adaptable to the varying needs of users at all stages of life, in accordance with Local Plan policies The Council will also encourage the retrofitting of existing residential buildings and units to better suit the day-today needs of older people, including by making them wheelchair adaptable or accessible. All proposals for retrofitting (via internal external alterations) must ensure compliance with other Local Plan policies such as those that relate to the protection of the historic environment, heritage assets and character of an area. 4.6.3 Specialist older person housing is a term used to describe a range of types of housing ~~(i.e. use class C3)~~ that suit and meet the needs of older people and does not apply to residential and nursing care homes. This provides housing that enables an older person to live independently in their self-contained living space, with communal facilities and varying levels of support (if needed). This can include age restricted housing for people aged 55 years or above, such as key products like retirement living or ~~sheltered~~ housing for older people aged 60 and above (usually with on-site support and some communal facilities), extra care housing (with on-site care services) and care villages or continuing care retirement communities (with higher levels of care). it should be noted the market for older people accommodation is diverse and evolving and other products may fall within the definition of specialist housing[13]. The benefits of specialist housing are; they enable older people to live independently for longer, with positive health and wellbeing outcomes, whilst allowing access to care staff (if needed). They can result in savings for the NHS (i.e. reduce admissions and long stays) and adult social care, prevent/delay more costly moves into care homes; provide dementia-friendly accommodation; free up under-occupied homes (often with gardens) to meet the needs for family sized housing. 4.6.4 Further, residential or nursing care homes address the accommodation needs ~~(i.e. use class C2)~~, usually of those who are aged 75+ or have serious health issues or needs that requires specialist care staff or professional nursing staff. These are non-self-contained accommodation, comprising of a residential setting where a number of older people live, usually in single rooms, and have access to on-site care services and other facilities. ~~4.6.5 The London Plan (2021) Policy H13 sets the Borough an annual benchmark target to provide 165 units per annum (or total of 1980) of accommodation for older people between 2017-29 (12 years). This equivalent of 2300 units older people units over a 15-year period and 3,300 units over 20 years (2021-41). However, the Draft Local Housing Needs Assessment (LHNA) indicates this benchmark figure does not take account of the anticipated lower rate of forecasted increase in the older population, after 2029 and may have been overstated the level of need. The Council will monitor need, supply, pipeline of older people accommodation during the Plan period, and will consider updating the evidence (if necessary).~~ 4.6.6 ~~The Councill commissioned Housing Learning Improvement Network (LIN) to undertake an assessment (2022) of the future need, for housing and supported accommodation for older people and adults who have care/support needs, including those eligible for care from Harrow Council adult social care, covering a period between 2022 -32. The aim of this was to inform the Council's future housing planning, investment and delivery programmes. This indicates a total need to provide 980 units~~	Supporting text of Policy HO6 Amended the by deleting references to use classes, in relation to affordable housing provisions in response to a legal ruling on the Rectory homes challenge in South Oxfordshire, to ensure the policy is effective. Para 4.6.5 and 4.6.6 amended. These have been moved to Para 4.0.6 and 4.0.7 of the supporting text of policy SP3, as they relate to need and therefore relate to the strategic housing policy.

[13] See Appendix 1: glossary for a definition of the different types of older people accommodation.

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		~~of specialist accommodation for older people between 2022-32 (10 years), comprising of circa 660 units of retirement housing; 320 units of extra care housing. In addition, it noted 30 bed spaces for residential care and 200 bed spaces for nursing care are required to address local needs. Therefore, a large proportion of housing needs of older people would be addressed via the delivery of a higher level of specialist older people housing such as extra care, retirement housing and there is small need to deliver nursing care homes and limited/no need for care homes.~~ The LIN study indicates a total of 390 wheelchair accessible dwellings are likely to be required by 2032, to address the unmet needs of adults aged 65+. Therefore, the Council will require specialist older person accommodation products targeted (e.g. age restricted retirement villages) at the older population aged 65 (or over) to include a higher proportion of wheelchair accessible dwellings that meet Category (M4(3)(2)(b)) standards of building regulations to ensure older residents are living in well-designed environments and able to live safe, independent lives. The appropriate number of units that are wheelchair accessible dwellings within a scheme will be determines on a case-by-case basis and will consider site specific factors such as the need the optimise units, viability, site size and other constraints. Robust evidence will be required to justify a departure from this requirement. 4.6.7 The Council's Housing Strategy (2019) seeks to move away from the traditional model of providing care homes (with support staff) toward providing specialist older people housing with an appropriate level of support and ensuring existing/new stock of housing meets accessible and adaptable standards, to enable older people to remain independent within their accommodation. More general levels of accessibility in the wider public realm are also an issue and can also help enable people to remain in their homes for longer; policies which make streets more liveable can help to remedy this. The strategy indicates the overarching need is for affordable extra care housing for rent. It also seeks to increase the supply of extra care housing for older people in Harrow with frailty, mild to moderate dementia, physical disabilities and mild learning disabilities who can continue to live independently with appropriate support in place as an alternative to residential care. Further, it recognises a need to develop specialist housing solutions for people with dementia, through an approach that integrates housing, adult social care and health. 4.6.8 The Council's Adult Social Care Services Team have produced a Market Position Statement[14]. This sets out the Council's current commissioning approach and market opportunities for providers. it sets out the current understanding of social care needs, forecasts and demand projections. Further, its sets out Adult Social Care's commissioning intentions for Housing, including Extra Care and Supported Living, as well as areas such as Older People, People with Dementia, Learning Disabilities and Autism, Equipment Services and Assistive Technology etc. This will be updated, when necessary throughout the Plan period. 4.6.9 Applicants will be required to demonstrate how their proposal has considered the finding of the above evidence-based documents (or any subsequent updates to these) and how this has informed the type of product they are proposing. Further, applicants are encouraged to have early discussions with the Council's Housing, Adult Social Care teams and other stakeholders, to ensure their proposal is addressing a specific local need, an appropriate design and layout, as part of the application process. 4.6.10 The Council's affordable housing policy will apply to specialist older people housing as set out in the London Plan. ~~falling within a C3 use class. In addition, the affordable housing policy may also apply to C2 proposals that include self-contained units with a greater level of support floor space and there may be potential for residents to purchase them and choose their support/care provider~~. In relation to tenure of affordable housing within a scheme, the Council may accept a different split if robust evidence is provided by the applicant to justify this~~, as well as may consider a lower contribution if the units are 100% low cost rented products~~. 4.6.11 Specialist older persons and care home accommodation must be sensitively integrated into neighbourhoods at locations that are well-connected by public transport, and within easy reach of community facilities and services. Residents, carers and visitors should benefit from safe and convenient access to and from the site as well as the surrounding area. Developments	Modification to ensure consistency with the London Plan and ensure the policy is effective.

[14] https://www.harrow.gov.uk/downloads/file/31688/MPS_Accessible___New_Logo_130723.pdf

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		should include accessible pathways and gradients to enable residents to move with relative ease whether by walking or with the use of aids, such as wheelchairs or mobility scooters. Accessibility is vital to ensuring the development adequately responds to the mobility needs of occupiers. It is also important to promote independence and facilitate social interaction, which in turn can help to address isolation and loneliness, which is a key public health issue. 4.6.12 There are a range of specialist older housing products that are designed for older people. Supported housing for other vulnerable groups is covered under Policy HO7. The Council will consider which use class a proposal falls into on a case-by-case basis, although extra care facilities will generally be considered to be C3 use unless they include a significant element of care. This will consider the supporting text of London Plan Policy H13 that provides guidance on the factors that should be considered, to clearly distinguish whether a scheme should be classed specialist older people homes or care home accommodation. Where a development proposal does not meet the attributes of specialist older persons accommodation or care home accommodation set out in the London Plan, then the general housing policies in the London Plan and Local Plan will apply. Regardless of whether extra care facilities are determined to be a C2 or C3 use (or Sui Generis use which could also be justified in principle), relevant policy requirements including affordable housing will apply. Development proposals must provide details of care aspects (including qualifying age), entry criteria, minimum expected numbers of care hours per week and the proportion of residents expected to need different levels of care; and how the facilities are to be funded and managed. 4.6.13 To ensure high quality accommodation is provided, the design of specialist residential accommodation for older people (including new build, conversions and extensions) must demonstrate it has considered and addressed a number of key design aspects. To ensure appropriate privacy for residents, elements of a building should be ranked on a scale of ascending privacy, with the most public spaces close to either main entrances or centrally located, and the private dwellings the farthest away from the main entrance. There should be separation between areas just for residents, staff and visitors with a distinction between shared spaces. Provision of communal spaces must be proportionate to the scale of the accommodation and not excessive, optimising the accommodation for residents whilst maintaining the usability of the communal spaces. Research indicates that the sensory impact of the built and outdoor environment, in terms of colour, scent, light and touch can have a positive impact on quality of life of the elderly ~~and those suffering from dementia~~, as well as can help ensure they maintain their independence for longer. In line with Policies GI3: Biodiversity and GI4: Urban landscaping and Trees, proposals should ensure that the design scheme of outdoor amenity areas are sensory stimulating for their occupants and reflect established good practices (e.g. dementia friendly design), particularly for the elderly and those who are experiencing dementia <u>or and other health conditions</u>. 4.6.14 Suitable bathrooms, storage space for equipment and appropriate rooms for activities must be provided. Providing and retaining storage space is important for mobility scooters, hoists and other equipment both in existing accommodation and new provision. In particular, extra care should provide sufficient charging points for scooters, equivalent to 25% of dwellings. Likewise, conversions involving loss of activity rooms/amenity rooms would also need to be justified. 4.6.15 Developments must also make adequate provision for access, parking and servicing for vehicles, with drop-off points for taxis, mini-buses and ambulances located near the building's principal entrance. 4.6.16 When determining applications for specialist forms of older people's accommodation, the Council may take account of detailed standards and design guidance including (but not limited to) the following documents or any appropriate successor documents: A. The design and build of successful extra care housing – Housing LIN17[15] B. Building better care homes for adults – Care Inspectorate[16]18; and	Para 4.6.13 amended to align with changes in policy

[15] Design principles A4 doc 08_02_11.indd (housinglin.org.uk)

[16] https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwj_s8H81aWCAxVgWEEAHe7uAyEQFnoECBMQAQ&url=https%3A%2F%2Fwww.careinspectorate.com%2Fimages%2Fdocuments%2F2279%2Fbuilding_better_care_homes-040414.pdf&usg=AOvVaw0rMbCi_MrjtPuHHN6YWbBe&opi=89978449

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		C. Extra Care Housing Development planning, control and management – RTPI Good Practice Note[17] 4.6.17 The Council owns a number of older person accommodations, the majority of which ~~are sheltered housing schemes and~~ were built between 1960-80s. Research indicates that some of this stock is likely to approach the end of its practical life during the Plan period, as it may not be consistent with current accessibility (e.g. for those with mobility issues), space and energy efficiency standards, as well as may not be suitable to address local needs. Therefore, the Council anticipates that some of these sites may require intervention to improve their conditions (e.g. refurbishment, retrofitting), whilst others may come forward as potential development sites to provide new/enhanced accommodation. This will help provide additional, suitable accommodation that is well designed, within accessible locations to local facilities/services to address the existing/future needs of the older population. This will provide more attractive option for older persons to downsize, release under occupied family sized accommodation and provide additional residential units to address local housing needs.	Factual update
MM26	Policy HO7 Pp141-145	**Policy HO7: Supported and ~~Sheltered~~ Specialist Housing** *Linkages:* *NPPF Chapter 5: Delivering a sufficient supply of homes* *NPPF Chapter 11: Making effective use of land* *London Plan Chapter 3: Design* *London Plan Chapter 4: Housing* **Policy H07: Supported and ~~Sheltered~~ Specialist Housing** 1. The Council will support proposals for the provision of supported and specialist ~~and sheltered~~ accommodation for vulnerable, disadvantaged individuals or groups of the population, providing; a. It is demonstrated the scheme will adequately address a specific local need, including those identified within the Council's housing and commissioning strategies b. it is suitable for the intended occupiers in terms of the standard of facilities and the level of independence, c. It provides the necessary level of supervision, management and care/support, security and community safety ~~(where necessary)~~ d. it is appropriately located in areas that there is easy access to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers ~~e. Regard must be had to any best practice standards that the Council considers relevant, and which are related to the specific type of accommodation and the people/groups it is targeted towards~~ ~~f. Proposals must consider and respond positively to the objectives, priorities of the Council's housing and commissioning strategies~~ ~~g.~~ e. It ~~contributes to creation of balanced, mixed and inclusive communities and~~ would not result in the over concentration of supported and ~~sheltered~~ specialist housing within a neighbourhood that would result in a harmful impact on the amenities of neighbouring properties and surrounding area. ~~h. It complies with other relevant policies within the Development Plan~~ 2. The Council will resist the loss of supported and ~~sheltered~~ specialist housing unless: (i) adequate replacement accommodation of the same quality and quantity will be provided for the particular group, in a suitable location ~~(ii) will be provided for the particular group; or~~ ~~(iii)~~ (ii) it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported/specialised ~~sheltered~~ housing; and	Policy title and policy text referring to sheltered housing amended by deleting these references to ensure consistent use of terminology in London Plan and Local Plan to improve the effectiveness of the plan. Parts 1a and f are amalgamated to ensure policy is more succinct and effective. Part 1c amended to avoid duplication and improve effectiveness. Part 1e deleted as it does contribute to the effectiveness of the policy. Part 1f is deleted to ensure policy is effective Part 1h deleted to avoid duplication with other parts of the plan to make the policy more effective. Part 2(i) and (ii) combined to correct a typographic error, to improve the effectiveness of the policy.

[17] GPN8:GPN1 New (housinglin.org.uk)

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		~~(iv)~~ (iii) it can be demonstrated that the accommodation is not suitable for the care of the intended occupants (or other relevant occupants of supported/ specialised ~~sheltered~~ accommodation) in its current condition and format and/or is incapable of being maintained at an acceptable standard **Supporting Text:** 4.7.1 The Council seeks to ensure everyone has access to a decent and secure home. Supported and ~~sheltered~~ specialist accommodation provide an essential place of residence for the most vulnerable and disadvantaged individuals or groups of society, as well as can include a certain level of support or care to address their distinct needs. The overall aim of this type of accommodation is to enable individuals with specific needs to live as independently as possible within the community, with an overall focus of promoting social inclusion. 4.7.2 The provision of a wide range of supported and ~~sheltered~~ specialist housing is likely to be necessary during the Plan period, including permanent, long terms and shorter-term accommodation that meets temporary needs. This can include foyer accommodation[18] for young people, refuges, and long-term accommodation for people with ongoing support needs. The wide range of supported housing types may also include accommodation referred to as hostels (which may or may not have an element of care, but are distinct from visitor accommodation hostels). In planning use class terms, supported housing may be considered Sui Generis, C2 or C3 and would usually be considered exempt from (or be provided instead of) affordable housing requirements. 4.7.3 The Council commissioned Housing LIN to undertake an assessment the future need, over the next ten years (2022-32), for adults who have care/support needs, including those eligible for care from Harrow Council adult social care. A summary of the key findings of this are include below: (a) **Adults with mental health needs:** This indicates there were a circa total of 400 individuals, aged between 18-64 living with a mental health related need living in Harrow in 2022. A significant proportion of this population lived in mainstream housing (48%), followed by supported housing (26%), residential care (21%) and a smaller amount in nursing care (5%) and shared lives placements (1%). It projects that there will be a 100% increase in the number of adults who have mental health issues by 2032 (increase of 400 individuals). But in terms of type of future accommodation needs, their research indicates there will be a gradual shift towards supported accommodation (36%) with significant level of support, to enable recovery and independence, a 50% decline in in people living in nursing and residential care homes and half of needs will be accommodated in mainstream housing with a certain level of support if needed. (b) **Adults with learning disability:** This indicates there were a circa total of 644 individuals, aged between 18-64 living with a learning disability living in Harrow in 2022 A significant proportion of this population were living with family/friends or informal carers (33%), followed by mainstream housing with care/support (23%), residential care (23%). Whilst a smaller proportion were living within supported housing/living either self-contained or shared (18%) and nursing care (2%). The number of adults with learning difficulties is expected to increase to 675 (5%) individuals by 2033. Further, in relation to type of accommodation required to address this need, it suggests there will be a higher need for supported housing/ living in a self-contained environment (i.e. 25%), a rise in shared lives adult placements (5%), as well as 50% decline in adults living in residential care (11%), a decline in nursing care and a decline in individuals living with family/friends (25%).	

[18] This is a type of secure accommodation that includes support for the personal development and encourages the independent living of its disadvantaged, vulnerable individuals

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		(c) **Adults with learning difficulties/autism:** It is estimated that there will be an increase in 155 people with leading difficulties/autism by 2032. It suggests this need should be addressed via rented supported housing (120) and shared lives accommodation (35). 4.7.4 The Council's Housing Strategy 2019 indicates there is a continuing need for supported housing to meet the needs of groups (regardless of age) such as people with learning disabilities, people with physical disabilities, individuals and families at risk of or recovering from homelessness and rough sleeping, people recovering from drug or alcohol dependency, people with mental ill health, vulnerable young people (such as care leavers and teenage parents) and people fleeing domestic abuse. The Council will continue to work with a range of stakeholders, partners (e.g. registered providers) to deliver additional supported and/or specialist~~, sheltered~~ accommodation products to address the future needs. 4.7.5 The Council have developed a Market Position Statement (MPS) for Adult Social Care Services in Harrow, which sets out the current commissioning approach and market opportunities for providers, the current understanding of social care needs, forecasts and demand projections. It will set out Adult Social Care's commissioning intentions for Housing, including Extra Care and Supported Living, as well as areas such as Older People, People with Dementia, Learning Disabilities and Autism, Equipment Services and Assistive Technology etc. 4.7.6 Applications should clearly set out how the development will assist in meeting an identified need for the use proposed. It is vital that the accommodation is appropriate for the use and group(s) for which it is intended, so that the specific type of managed care or supervision required can be delivered effectively. Applicant will be required to set out how their proposal has considered and responded to the finding of the above evidence-based documents (or any subsequent updates to these) and how this has informed the need, type of supported or ~~sheltered~~ specialist housing product they are proposing. Further, applicants are encouraged to have early discussions with the Council's Housing, Adult Social Care teams and other stakeholders when developing their proposals for supported and ~~sheltered~~ specialist housing schemes, in relation to the type of product being proposed and specific level of care / management requirements. 4.7.7 Supported housing may be acceptable as part of a mixed-use development, although where a proposal involves more sensitive types of supported housing, this may not be appropriate. 4.7.8 The Council consider supported housing to be any housing scheme where housing, support and (where relevant) care services are provided (or are capable of being provided) as an integrated package. Some schemes are long-term, designed for people who need ongoing support to live independently. Other, semi-independent living options are designed to help people develop the emotional and practical skills needed to move into more mainstream housing and provide varying levels of support. Support can include help with health needs, including mental health, drug and alcohol use, managing benefits and debt, developing daily living skills and accessing education, training and employment. Supported housing provision may be necessary for a range of people/groups[19] . Policy H12 of the London Plan includes a detailed list of groups for whom supported and specialist ~~sheltered~~ accommodation may be suited for. Applicants will be required to submit a satisfactory management plan, detailing the level, type, duration of support/care that will be provided to the intended occupants. Measures required for the security and safety of the user (if necessary) shall be set out within the management plan. 4.7.9 In order to secure mixed and inclusive neighbourhoods and communities, development proposals should not result in a harmful overconcentration of similar uses within an area. 4.7.10 Existing supported housing and ~~sheltered~~ specialist accommodation will be protected where need exists and the accommodation remains suitable, unless it is adequately replaced. The replacement can occur on-site or off-site and will be considered in terms of both the quality and quantity of accommodation replaced, in line with relevant best practice standards	Modification to reflect evidence base and to ensure the policy is effective.

[19] The relevant policy for accommodation related to older people, which may include housing which could be referred to as supported housing, is Policy HO6 Accommodation for older people

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		and the ability/need to provide continuation of a service. Off-site replacement may be acceptable but will depend on the quality of accommodation as set out within Part 1 of the policy. 4.7.11 Proposals must demonstrate the supported and ~~sheltered~~ specialist accommodation is no longer needed for particular groups, to justify a loss of these. This should be considered at a local level to ensure that varying changes in provision at a wider scale are considered. Changes in service delivery can render accommodation outdated and no longer fit for purpose. Where loss of such accommodation is proposed, this must be evidenced including information which shows that refurbishment is not possible. Accommodation must be proven to be not fit for purpose for the existing specific supported housing and for other relevant types of supported housing which could reasonably occupy the accommodation. In some cases, a replacement development may provide units meeting different supported housing needs which fall within different use classes. 4.7.12 Proposals involving the loss of existing supported housing must take every opportunity to accommodate unmet need(s) for other relevant types of supported housing. There are a range of supported housing need(s) which will need to be considered, with differing design considerations which need to be considered to assess the feasibility of utilising existing provision. Consultation with the Council's Housing department, Adult Social Care department and/or Children's Services department must occur as part of evidencing meeting unmet need. Applicants must ensure the proposals for supported and ~~sheltered~~ specialist housing promote high quality design in line with other policies of the relevant Development Plan. It will also be important to ensure that the design of outdoor amenity/communal areas are sensory stimulating for their occupants, to promote the health and well-being of its occupants, as well as help recover emotional or psychological stress of past experiences and maintain independent living.	
MM27	Policy HO9 Pp151-155 Up to para 4.9.10	**Policy HO9: Large scale purpose built and conversion for shared living** A. Proposals for large-scale purpose-built shared living (LSPBSL) and the conversion (or change use) of existing buildings for shared living[20]will be supported where they comply with London Plan Policy H16 and the following requirements: a) Proposals will be required to demonstrate how they are meeting an identified local housing need based on local incomes, rent levels and existing/future demographics of the Borough b) Applicants will be required to demonstrate the affordability of the proposed LSPBSL products within their scheme compared with the alternative products within the Harrow private rental sector, c) Proposals should be located within the boundary of the Harrow and Wealdstone Opportunity Area d) There must not be two LSPBSL schemes (including sites with permission) within a 250m walking distance of each other to avoid an over-concentration of similar uses, unless robust evidence demonstrates the site will not be suitable or viable for appropriate alternative uses. ~~e) The LSPBSL scheme should not have a detrimental impact to;~~ ~~i) Residential amenity of the neighbouring properties and surrounding area~~ ~~ii) The character of the area~~ ~~iii) The need to support and maintain mixed and inclusive communities~~ ~~f)~~ e) Proposals on sites with extant permission or allocated for self-contained dwellings will ~~not be supported to avoid compromising the delivery of conventional housing to address future needs and targets, unless~~ will only be supported where adequate evidence is submitted to demonstrate viability issues to avoid compromising the delivery of conventional housing to address future needs. ~~g)~~ f) The ground floor of the scheme should be designed and located to be active street frontage or public realm. It should provide: i) Flexible workspaces,	Part Ad amended to provide clarity and ensure the policy is effective. Part Ae is deleted to avoid duplication with other parts of the Plan (i.e. SP3, GR1) Part Ae (original Af) amended to ensure policy is positively prepared

[20] NB: Any references to the acronym LSPBSL within the policy and the supporting text will also apply to proposals for change of use/conversion of a building for large scale shared living

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		ii) Public amenities (e.g. restaurants, cafes, leisure facilities) that are suitable for its location. These should be accessible to the wider public, to integrate it into the surroundings area, to support inclusive and sustainable communities. ~~h)~~ g) To support a circular economy, proposals must demonstrate a flexible design and layout to allow the LSPBSL scheme to be converted/retrofitted to an C1 hotel or C3 self-contained residential uses, or other town centre uses (where appropriate) without the need for demolition and rebuild ~~f) Proposals must demonstrate satisfactory servicing arrangements are in place for deliveries, waste management and emergency vehicles and no adverse impact on the safe operations of the highway network, in line with other Local Plan Policies~~ ~~g) The applicant must provide a management plan, to the satisfaction of the Council, to address the requirements of the Policy H16 of the London Plan and the Mayors London Plan Guidance on LPBSHL. This will be secured by way of a S106 agreement.~~ B. The design and layout of LSPBSL schemes in terms of their layout, functional living spaces, level and type of communal facilities must be in compliance with the LSPBSL London planning guidance (LPG). C. Affordable housing contributions will be required, in accordance with London Plan Policy H16. D. The Council will resist any proposals that seek to reduce the quantity, type or restrict access to amenity provisions included within LSPBSL, after permission has been granted. E. Applicants will be required to submit a satisfactory Management Plan in line with Policy H16 of the London Plan and the Mayor London Planning guidance, which will be secured via a S106 agreement. **Supporting Text:** 4.9.1 Large-scale purpose-built shared living (LSPBSL) housing is a purpose-built managed rental development, with non-self-contained units comprising of functional private living areas with extensive communal spaces and facilities, under single professional management. They include a wide range of amenities to support a diverse community of residents and their needs. 4.9.2 They provide a housing option for households who cannot or choose not to live in self-contained homes, flat shares or HMOs and are often targeted at younger, single, high skilled professional individuals who may use this product on a transition basis until they find suitable long-term housing, as well as for those working within London part of the week or on a temporary basis. They can help add to the stock of rooms available for rent in the borough but are different from other rental products (such as HMO's, hostels) and LSPBLS can be less affordable than the alternatives. But they differ from other products in terms of the general size of rooms, the level/type of communal facilities and the arrangements for management/maintenance of the scheme. 4.9.3 LSPBSL could play some potential role to help free up the stock of other forms of accommodation, particularly family sized housing (three bed or more) that are highly required to address local housing needs during the Plan period. However, further research is required in this relation to the extent of this relationship, as LSPBSL products are a relatively new product in the private rented sector of the London housing market. 4.9.4 LSPBSL housing is a unique new form of development that seeks to address the demands of a niche subset of the housing market that do not fall within conventional C3 residential use, so policies are required to shape the delivery of these. This helps ensure LSPBSL are well designed, with adequately sized rooms, a sufficient quantity and quality internal/external communal areas and facilities; to enable future residents to fulfil their daily needs, interact with one another; and develop sustainable, cohesive communities, as well as promote their health and well-being. They may provide residents with increased security via a medium – long term tenancy agreement, to enable them to establish themselves, feel more	Part Af (original) is deleted to avoid duplication with other parts of the Plan (i.e. SP10, M3) Part Ag (original) has been moved to new Part E of the policy and is therefore deleted. New Part E (moved from original Part Af) as more appropriately a standalone requirement in relation to the management of any proposal, in order to improve the effectiveness of the policy.

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		connected to a locality, and be part of a community. Assuming LSPBSL schemes are well managed, maintained, they may avoid generic issues related to HMO properties, hostels, flat shares; such as a lack of/poor quality shared communal facilities and amenity facilities, insufficient parking spaces, lack of long-term tenancy security and transitory living, as well as the poor management/maintenance of properties. Policy can also seek to ensure future schemes are located within the most accessible locations to local facilities, services and avoid the potential loss of residential uses/permissions via speculative applications and an over concentration of LSPBSL and other similar uses. 4.9.5 The London Plan (2021) Policy H16 and Policy HO9 will apply to all proposals developments for LSPBSL and the change of use/conversions of buildings for shared living on, schemes that consist of at least 50 non-self-contained units. It should be noted that any shared living housing schemes below 50 units will be assessed against the criteria of Policy HO10: Housing with Shared Facilities. 4.9.6 The ~~Draft~~ Local Housing Needs Assessment (2024) did not identify any requirement to provide LPBSL accommodation to address any specific local housing needs, as a younger population (aged 25-44) and single households are not projected to increase during the Plan period and the Borough lacks a significant student population. Further, a significant level of future housing need is for larger family sized dwellings (three bed or more) or medium sized units that could potentially be occupied by families, as well as providing accommodation that is suitable for an ageing population. Further it states "*Whilst LSPBSL provides an additional housing option for some people, due to the unique offer of this type of accommodation, it does not meet minimum housing standards and is not therefore considered to meet the ongoing needs of most single person households in London*". 4.9.7 Therefore, applicants will need to demonstrate their LSPBSL proposals will address local housing needs. This should include an assessment of the local rental rates, incomes of residents who are likely to reside within LSPBSL, current/future demographic trends, and any other relevant market factors (if necessary). Further, applicants will be required to demonstrate how the affordability of their proposed LSPBSL products compares with alternative products within the private rental sector of the housing market. This evidence will enable the Council to determine if there is a local need for LSPBSL products and if these products are the most appropriate way to address this need, as well as meeting other policies / objectives in the Local Plan, such as the retention of family size housing rather than these being converted to HMOs. Further, it is important for policy to ensure LSPBSL does not compromise the delivery of conventional housing (i.e. sites with extant permission, allocations,) to address future housing needs and meet targets[21]. This approach prioritises the delivery of conventional self-contained housing to address the needs of families and low-income groups who require affordable housing, as well as avoids any potential harmful effects of any over concentration of LSPBSL on residential amenity or the mix of uses and balance of population in a neighbourhood. 4.9.8 In compliance with the London Plan, proposals for LSPBSL will be supported within the boundary of the Harrow and Wealdstone Opportunity Area, a significant part of which has a high public transport accessibility rating (5 -6). The Harrow Metropolitan and Wealdstone Town Centres and the Station Road Corridor~~s~~, along with two main railway/tube stations and a bus station fall within the boundary of the Opportunity Area. This is considered the most sustainable locations for accessing public transport, local services, facilities and pursuing employment opportunities. The Plan anticipates the Harrow & Wealdstone Opportunity Area will accommodate a significant level of housing and employment growth. This is considered the most suitable locations for accommodating 50 or more units LSPBSL schemes and the supporting communal facilities required to deliver functional living spaces, whilst minimising any potential harmful effects on the character areas of the Borough and ensuring viability. It should be emphasised that LSPBSL developments generally require a significant level of units to be delivered within a scheme, at a sufficient scale, in order to benefit from economies of scale and cover the cost of providing/servicing communal facilities and managing the development to an acceptable standard, as well as ensuring viability. Therefore, LSPBSL tend be built at high densities on sites that are of a small size and are likely to require 4 or more storeys development. In contrast, the predominate character of the Borough is two -three storeys in suburban locations and	

[21] .e.g. 1.8 beds of non-self-contained housing such as LSPBSL= 1 C3 unit for monitoring purposes

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		three to four storeys with the town centres and near transport hubs. This means LSPBSL schemes are unlikely to be suitable or viable in locations outside of the Opportunity Area due to the lack of available larger sites and their potential adverse impact on the character of the Borough, particularly in suburban locations. 4.9.9 This policy requires that two or more LSPBSL schemes should not be located within a 250m distance of each other (i.e. existing permissions, constructions, completions) in order to avoid an over-concentration of such uses that could have a detrimental impact on residential amenities, the character of the surrounding area, the diversity and mix of uses, as well as the objective of promoting mixed and inclusive communities. Further, the potential over-delivery of LSPBSL products will compromise the delivery of conventional self-contained residential accommodation which would fully address local housing needs, particularly for increasing the delivery of family sized and affordable housing, as well have an adverse effect on achieving, balanced mixed and inclusive communities (Policy SP3 5E). Proposals that do not comply with this requirement, will be required to provide robust evidence to demonstrate no appropriate alternative uses would be suitable and viable on their site, based on factors such as the location of the site, the character of the surrounding area and local needs. This also helps avoid a potential oversupply of LSPBSL accommodation that could have adverse economic and social impacts for the Borough, and allows the Council to monitor the locations and potential impacts of this new product during the Plan period. 4.9.10 ~~Applicants will be required to submit a satisfactory Management Plan in line with Policy H16 of the London Plan and the Mayor London Planning guidance, which will be secured via a S106 agreement. This~~ Management Plans will cover matters such as the need to demonstrate adequate operational arrangements, how spaces will be maintained, and how the scheme will function as a high quality LSPBSL, as well as measures to mitigate any potential harm to the amenities of future residents and neighbouring properties.	Para 4.9.9 amended to reduce duplication with text included within the policy. Modification to make the plan effective by removing duplication with the policy.
MM28	Policy HO10 Pp157-161 Up to para 4.10.9	**Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)** Development proposal for Houses in Multiple Occupation (HMO)[22]/ and Hostels with shared facilities in the Sui Generis Use Class will only be permitted, providing they comply with the criteria below: (1) The internal floor area of the dwelling should exceed 130m2 (as originally built) (2) It is located within an area that has a PTAL rating of 4-6 with good access to public transport, local services and facilities. (3) It should not be located within a residential street or area that is characterised by family housing (4) There should be no harmful impact on the amenity of occupiers of neighbouring properties and the character of the area. (5) Adequate arrangements are made for the provision of amenity space for future occupiers in terms of access to gardens and communal facilities and areas. (6) It is well-designed, high-quality accommodation with rooms of an adequate size for their purpose, having regard to internal space standards (set out in the London Plan and supporting guidance) with adequate functional living spaces and layout. (7) Ensure an adequate level and type of ancillary facilities such as kitchen areas, WC's, storage space and communal areas for lounging, dining are provided to address the daily needs for the proposed number of occupants (8) Adequate arrangements are made for the storage and collection of waste and recycling material generated by future occupiers of the development, which does not give rise to nuisance to future occupiers and neighbouring properties or a detrimental impact upon the streetscape. (9) It should ensure all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise. (10) It ensures a balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) that does not detract from the appearance of the property or the street scene. ~~(11) Adequate provision is made for car parking and safe access to property and does not result in a harmful cumulative increase on street parking (in compliance with policy M2 Parking) or the safety of other road users.~~	Part 11 is deleted to reduce duplication and cross-references (to improve effectiveness)

[22] NB: This Policy will also apply land use class C4 (and any subsequent updates to use class orders), if the Council introduce an article 4 during the Plan period (.i.e. a small HMO housing 3-6 people)

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		~~(12)~~ (11) It contributes to creating an inclusive community and would not result in the over concentration of HMOs/Hostels within a neighbourhood that would harm the mix, balance and well-being of communities. For HMOs, an over concentration is defined as an instance where three or more of the nearest ten properties are HMOs,(i.e. 5 on each side of an application site, on the same side of the highway). ~~(13)~~ (12) The Council will resist proposals that result in the loss of good quality hostel accommodation that address a specific local need for vulnerable members of the community, unless one or more of the following apply: a. It is demonstrated there is no local need for the type of accommodation. b. It is for a for a replacement provision at an equivalent or better standard. c. It is demonstrated to be unviable or unsuitable for addressing the needs of its users. d. The replacement provision is addressing a more acute local need (e.g. affordable housing). **Large Purpose-built HMO developments** ~~(14)~~ (13) The Council will resist proposals for new large purpose-built HMO developments, as these are not considered the most appropriate approach to meeting housing needs in the borough and can result in a poor-quality living environment for the occupants and potentially significant harmful amenity impacts on the surrounding area. On sites where the Council considers that large purpose-built HMO developments may be an acceptable form of housing in principle, proposals must: a) Be located within an accessible location to local facilities, services, transport in accordance with criteria ~~1~~2. b) Not result in the loss of housing that is suitable for accommodation by families, in accordance with criteria ~~2~~ 1 above. c) Prevent any harmful amenity impact(s) on the surrounding neighbourhood and the character of the area (in accordance with criteria 3 and 4). Sufficient evidence – including a detailed management plan – must be provided demonstrate this. d) Result in a well-designed and satisfactory living environment for its occupants in line with criteria 4-10 above e) A sufficient level and type, of communal facilities and spaces should be provided to adequately address the needs of the expected number of occupants. Communal facilities and spaces should not be located in too few locations, should be conveniently accessed and be designed to encourage incidental meetings, socialising, lounging and recreation between residents to foster friendships and a sense of community. f) Not result in an over concentration of similar uses and the achievement of mixed, inclusive communities in line with criteria ~~12~~ 11. **Supporting Text:** 4.10.1 A house in multiple occupation (HMO) is a form of residential accommodation that is occupied by unrelated persons who share amenities such a kitchen, bathroom, etc and form two or more households. A household is generally a family (or people with relationships similar to a family), including single persons and co-habiting couples. There are two main planning use classes for housing with shared facilities: a Use Class C4 HMO that is a 'small' HMO used by 3 to 6 unrelated people, and a 'large' HMO shared by more than 6 unrelated people is a Sui Generis use[23] (i.e. does not have a specific use class). For the purposes of this policy a hostel includes a building providing temporary non-self-contained residential accommodation with an element of supervision, but with no significant degree of care. Hostels are a sui generis use. 4.10.2 A permitted development right exists to convert/change the use of residential accommodation (C3 use) into a 'small' HMO (use class C4). In contrast, planning permission is required for the use/development of land and buildings for large HMOs in a Sui Generis use. This allows the council to consider issues such as access, design, parking, location and impacts on the character and amenity of surrounding area and neighbouring properties. All HMOs require a mandatory licence from the Council, which is outside of planning controls. This ensures HMOs are built and maintained / operated to a certain standard (e.g. room sizes, number/type of communal facilities, health and safety) and well managed but mandatory licencing does not	and ensure consistency with the London Plan. Parts 13 a-c, and f (original Parts 14a-c, and f) amended to correct cross referencing to other parts of the policy and ensure it is effective

[23] The above provides a summary of HMOs and the full legal definitions should be referred as appropriate, as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended). There are separate definitions in respect of the legal licencing of HMOs as set out in the Housing Act 2004 and related secondary legislation.

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		allow the Council to assess potential amenity impacts on the neighbouring properties and surrounding area, as well as location factors. 4.10.3 HMOs can provide a valued source of affordable accommodation in the stock of housing providing they are of high-quality design and provide good quality living standards and adequate space for people to live in. They are particularly important addressing the housing needs of: (a) Young and transient groups of the population, who have not reached a stage where they can or want to buy; (b) Vulnerable people and those on lower incomes who are unable to gain access to other forms of housing (e.g. self-contained accommodation) (c) People who would otherwise be homeless without bedsit types of accommodation, as they cannot afford to rent or buy a property as a single household. 4.10.4 The London Plan (2021) acknowledges the role that HMOs play as a strategically important part of the Capital's housing offer, with a provision that helps to meet distinct needs and reduces pressure on other elements of the housing stock. 4.10.5 The ~~Draft~~ Local Housing Needs Assessment (202~~2~~4) indicates that the size of the private rented sector has significantly increased since 1991 and HMOs have been particularly important for addressing the needs of the younger population due to the increased pressure on the stock of social housing and rising levels of rents. Further, it indicates that the number of sharing households aged between 25-44 years and single person households are not projected to experience any significant growth during the Plan period. Despite this, large-scale purpose-built shared living (LSPBSL) (see Policy HO9) may have the potential to play a role in reducing the pressure for family size housing to be converted to HMOs (subject to further evidence). The policy above reflects these two factors by seeking to resist the conversion of family-size housing to HMOs. It however also recognises that HMOs offer a more affordable form of shared living for those who cannot afford any other alternative and are unlikely to be offered accommodation in affordable housing (i.e. single persons). 4.10.6 There are concerns that a high concentration of HMOs can have a cumulative harmful impact on neighbouring properties and the surrounding area. The key reasons include the potential negative impact of the potential loss of family housing and the increased number of families having to reside in unsuitable accommodation (i.e. smaller overcrowded dwelling with a lack of satisfactory amenities, poor location), a transient population replacing settled family occupants, reduction in environmental quality, loss of character, waste management, overcrowding, increased anti-social behaviour and noise/disturbances, changes in supporting infrastructure such as shops, pressure on parking, and sustaining balanced, mixed and inclusive communities. HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families. Therefore, it is important for future policy to seek to address and minimise these potential harmful impacts. 4.10.7 In general accordance with the London Plan (2021), this policy seeks to facilitate HMO conversions, which intensify the use of existing premises, within the most appropriate locations that have good access to public transport, local; services and facilities (i.e. PTAL 4-6). This in turn promotes the use of sustainable modes of transport, reduces the need to travel by private car. It also reduces the potential risks of harmful effects such as the need for higher levels of hard standing areas for car parking that can result in the loss of biodiversity/soft landscaping in front gardens and increased surface water run-off. Managing the locations of HMO's also assists in mitigating negative impacts on the character of the Borough and the potential loss of larger housing in areas that are characterised by family housing. 4.10.8 To ensure that HMOs are built, maintained and managed at an acceptable standard, the Council operates mandatory and additional licencing schemes, in accordance with housing legislation. Through this regime the Council has published the Harrow Standards for Licensable HMOs[24]. All development proposals for HMOs must be well designed in terms of their	

[24] Applicant should refer to the HMO standards in the link below or any subsequent equivalents to this.
https://www.harrow.gov.uk/downloads/file/23800/hmo-standards-and-regulations.pdf

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		layout and functional living areas. An adequate level of rooms must be provided of appropriate sizes in line with the internal space standards included within the London Plan. A sufficient level ancillary facilities (W/C, kitchen and storage areas) facility; as well as a range/level of communal areas/facilities; should be provided in order to address the needs of the proposed number of occupants. Applicants should also consider any standards and requirements of the Council licencing regime. 4.10.9 As the other sections of the Plan (e.g. housing size mix, conversion policies) have emphasised, the ~~Draft~~ LHNA 2024 indicates there is a high priority to increase the delivery of family sized housing to address the future local housing need. The Local Plan evidence indicates that the potential scope to achieve this may be constrained by the size, type and location of sites that may come forward during the Plan period. These factors have resulted in housing affordability issues for young and low-income households. Therefore, the policy introduces a number of measures to protect the existing stock of family sized housing. It seeks to retain smaller sized family housing (below 130m2) as conversion of this housing to HMOs is likely to result in poorly designed accommodation and living environment for HMO tenants and the loss of the lower cost family housing stock. This policy allows the potential conversion of dwellings into HMOs providing the applicants demonstrate the location of the application site is not characterised by family housing. In relation to this, a recent legal judgement for a challenge to a decision clarifies that the assessment of whether a location/street is characterised by family housing should not be limited to the physical appearance of the built environment/premises and can also consider factors like occupancy and uses. Further, proposals have to be within the most accessible locations.	
MM29	Policy HO11 Para 4.11.8 P166	4.11.1 The Council maintains a brownfield register. This helps identify opportunities for self-build and custom build homes and possibly community led housing schemes on previously developed sites. The supply of self and custom build plots is typically very small scale, usually infill between existing dwellings and vacant/underutilised sites such as garage courts and car parks. In other countries however, groups of self-builders come together to deliver larger schemes, or it is common for service plots to be sold in the market. ~~The Council will consider potential sites for self-build and custom build housing if they are submitted through Call for sites consultation.~~ The Council will monitor the delivery of self-build and custom-build housing, as well as will work with stakeholders to bring forward potential sites (if opportunities arise) to increase the delivery of affordable housing and family sized housing in order to address local needs.	Factual update to reflect progress of the Local Plan.
MM30	Policy HO12 Pp167-169	**Policy HO12: Gypsy and Traveller Accommodation Needs** 1. The Council will seek to retain the existing Gypsy and Traveller site at Watling Farm (1.07ha) to provide ~~up to~~ at least 13 ~~12~~ additional pitches ~~(provisional),~~ to address future traveller needs between 2022-32. Any expansion will need to be well designed to protect or enhance the significance of nearby Watling Farm Grade II Listed building and it's setting. 2. The Council will support proposals for Gypsy and Traveller accommodation, including sites and pitches, providing they are of a high-quality layout and design and contribute to meeting identified local needs, and there is no capacity at the existing site at Watling Farm. 3. Proposals for new and replacement accommodation must make adequate provision for: ~~a) A suitable and safe access to and from the site, with sufficient space for the manoeuvring of vehicles~~ ~~b~~a) Satisfactory access, ~~parking and servicing arrangements~~ for all vehicles likely to use the site, including emergency services, with sufficient space for the manoeuvring of vehicles ~~c~~b) Basic amenities, including running water, sewerage/ drainage and waste management ~~d~~c) A site location that ~~is well-integrated into the locality with~~ has reasonable access to local shops, services and community facilities including education, health and public transport ~~e~~d) Facilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, and amenity space and play areas ~~f~~e) Appropriate landscaping and planting to address impacts on amenity and enable integration of the site with the surrounding environment, including measures to minimise any potential impacts on the local environment.	Part 1 is amended to reflect the latest provisional outcomes of the Draft GLA Greater London GTANA to ensure the policy is justified. Additional texted added to ensure consistency with national policy Original Part 3a is deleted and Part 3b (not 3A) amended to reduce repetition within the policy and other policies within the Plan (i.e. M2), to ensure it is effective. Original Part 3d (now Part 3c is amended to ensure consistency with national policy

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		~~g) Measures to minimise any potential impacts on the local environment, including any relevant policy designations within proximity to the site that would restrict its use for any type of housing (including but not limited to: Green Belt, Metropolitan Open Land and Sites of Nature Conservation Importance) and the character of the area including visual and amenity considerations~~ 4. Applicants must take account of any potential flood risk and the impacts of climate change when assessing the suitability of a site 5. Development proposals for Gypsy and Traveller accommodation must not pose a risk to public health and safety, and not adversely impact the amenity of site occupants and neighbouring properties	Original Part 3f (now Part 3e) is amended and Part 3g deleted to reduce repetition within the policy and other policies within Plan, to ensure it is effective.
		Supporting Text: 4.12.1 The National Planning Policy for Traveller Sites (2015), which sits alongside the NPPF, sets out the Government's aim to ensure fair and equal treatment for travellers in a way that facilitates their traditional and nomadic way of life, whilst respecting the interests of the settled community. 4.12.2 The Watling Farm Gypsy and Traveller (G & T) site is a Council owned. It is, circa a 1.07ha and contains two G & T pitches on it. It located on the northern edge of the Borough boundary with Hertsmere Borough Council. Its southern boundary is within proximity to the Royal National Orthopaedic hospital.	
		4.12.3 The Greater London Authority (GLA) commissioned external consultants to undertake a Gypsy and Traveller Accommodation needs Assessment (GTANA) for the Greater London area, to assess the future pitch needs of Gypsy and Traveller households based on the definition~~s~~ included within the ~~London Plan and~~ Planning Policy for Travellers (PTTS 2024~~3~~). ~~Both definitions include~~ This definition includes those households who have ceased travel either temporarily or permanently due to factors such as health, education or old age and all other persons with a cultural tradition of nomadism or of living in a caravan ~~, but the London Plan definition is broader as it considers other reasons for seizing travel~~.	Para 4.12.3 amended to ensure consistency with national policy
		4.12.4 The provisional findings of the study have been provided to the Council. These indicate that ~~between~~ 13 ~~(cultural definition) and 12 (PTTS definition)~~ additional pitches are required (after deducting the two existing pitches) to address the future accommodation needs of Gypsy and Traveller households, over a ten year period. The study~~is~~ also considered the needs of Gypsy and Traveller households who reside in bricks and mortar accommodation and have a cultural aversion to this. The Council is proposing to provide ~~up to~~ 13~~2~~ additional pitches based on the PPTS Gypsy and Traveller definition (2024~~3~~). This has been updated~~, since the Draft Local Plan Regulation 18 document was published;~~ to ensure Gypsy and travellers households are treated equally and fairly through the planning process. The GLA are intending to publish the final GTANA document ~~by the end of 2024,~~ and the Borough pitch need figures may be subject to change, based on this.	Para 4.12.4 amended to ensure it is justified with respect to the latest evidence base position.
		4.12.5 The Government's Planning Policy for Traveller Sites (PPTS) suggests the use of a criteria-based policy for any unknown households that do provide evidence that they meet the PPTS planning definition. This enables the Council to proactively plan for Gypsy and Travellers' accommodation needs, ensuring that new sites are well designed; ~~well-connected~~ with reasonable access to social infrastructure, health care, education and public transport facilities; and contribute to a wider, inclusive neighbourhood. As noted above, the current site has a~~n~~ historic permission for up to 15 pitches, ~~significantly more than current identified needs;~~ as such it is not envisaged that an additional site will be required during the plan period unless updated evidence indicates insufficient capacity at the existing site.	Paras 4.12.5 and 6 amended to ensure consistency with national policy
		4.12.6 Any new proposed Gypsy and Traveller sites will need to provide a ~~safe and acceptable~~ living environment essentially consistent with the characteristics expected of mainstream housing ~~and ideally forming part of a wider balanced and mixed residential community~~. This includes having reasonable ~~good~~ access to social infrastructure to help address recognised	

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		disadvantages in relation to educational attainment and health/life expectancy that members of the Gypsy and Traveller Community have experienced. Nevertheless, there should also be consideration of particular needs such as ability of work vehicles and homes to access the main road network and facilities that support employment. ~~The Council aims to further Harrow's reputation as a place that welcomes diversity. Therefore, the design and layout of Gypsy and Travellers' sites, particularly at their edges, should look to integrate well with its surroundings and promote opportunities for positive interaction with the adjacent townscape and associated communities.~~	

Chapter 5 – Local Economy

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<td><u>MM31</u></td>
<td>SP04 up to para 5.0.6 pp171-173</td>
<td>

Strategic Policy 04: Local Economy

A. The Council will ensure sufficient employment floorspace is provided to enable a strong and flexible economy that is adaptable to changing circumstances whilst positively contributing to the wider London economy.

<u>Town Centre Hierarchy</u>

<u>B. Town centres are listed below and are identified on the Policies Map.</u>

<table>
<tr><th><u>Town Centre</u></th><th><u>Classification</u></th></tr>
<tr><td><u>Harrow Town Centre</u></td><td><u>Metropolitan</u></td></tr>
<tr><td><u>Edgware (part)</u></td><td><u>Major</u></td></tr>
<tr><td><u>Wealdstone</u></td><td><u>District</u></td></tr>
<tr><td><u>South Harrow</u></td><td><u>District</u></td></tr>
<tr><td><u>Rayners Lane</u></td><td><u>District</u></td></tr>
<tr><td><u>North Harrow</u></td><td><u>District</u></td></tr>
<tr><td><u>Pinner</u></td><td><u>District</u></td></tr>
<tr><td><u>Stanmore</u></td><td><u>District</u></td></tr>
<tr><td><u>Burnt Oak (part)</u></td><td><u>District</u></td></tr>
<tr><td><u>Kingsbury (part)</u></td><td><u>District</u></td></tr>
<tr><td><u>Kenton (part)</u></td><td><u>District</u></td></tr>
<tr><td><u>Sudbury Hill (part)</u></td><td><u>Local</u></td></tr>
<tr><td><u>Hatch End</u></td><td><u>Local</u></td></tr>
</table>

<u>C. 34 Neighbourhood Parades are identified across the borough, as set out on the Policies Map, and detailed in Appendix 4.</u>

Town Centres, Offices and Retail Floorspace

<u>D. In order to meet local needs for main town centre uses to 2041, the following uses will be delivered:</u>
<u>1. 13,900m^2 retail and food and beverage</u>
<u>2. 7,000m^2 Leisure, Entertainment and Cultural Uses</u>

~~B.~~ <u>E.</u> The Council will support proposals that demonstrably contribute to the vitality and viability of the local economy by:
a. Supporting appropriate developments and uses that support the role and function of the hierarchy of town centres;
b. Continuing to focus appropriate town centre development in the Harrow Metropolitan Town Centre primary shopping area;
c. Assisting in meeting the evidenced floorspace needs for the borough across the plan period;
d. Providing for a range of uses appropriate to their locations in both size and use class;
e. Supporting proposals that are flexible / adaptable to meet appropriate employment uses, and to make best use of space including temporary meanwhile uses;
f. Supporting proposals that seek to intensify employment floorspace; and
g. Supporting mixed use developments in appropriate locations or where supported by a masterplan approach.

</td>
<td>Modification to insert new Part B and Part C to ensure the policy is consistent with national policy by setting out the centres hierarchy in the borough and is effective by linking town centres shown on policies map.

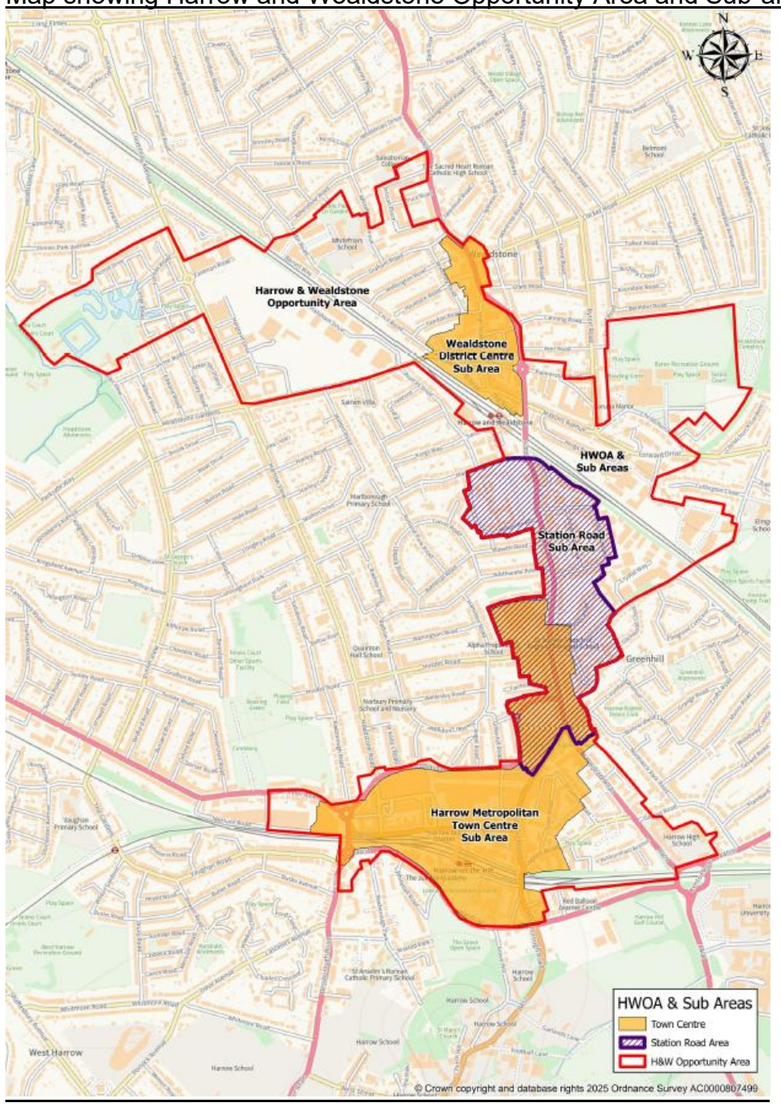
Modification to insert new Part D to include non-residential floorspace requirements across the plan period to ensure the policy is consistent with national policy</td>
</tr>
</table>

Ref	Chapter /page/policy number	Modification	Reason for Modification
		Industrial Land and Premises ~~C.~~ F. The Council will ensure 6,000m^2 of additional industrial floorspace ~~sufficient provision of industrial floorspace and premises~~ is delivered by 2041 through: a. Meeting the identified floorspace need across the borough over the plan period; b. Supporting intensification, modernisation and, where feasible, the environmental performance of industrial floorspace and premises; c. Safeguarding Strategic Industrial Land & Locally Significant Industrial Sites by prioritising the ongoing function of these areas for general industry, storage or distribution or other industrial uses; ~~Use Class B2, B8 and related Sui~~ Generis Industrial Uses; and d. Seeking to direct light industrial, research & development, and creative industries ~~Use Class E(g) (ii) & (iii)~~ activities to appropriate and sustainable locations outside of SIL and LSIS premises. **Local employment and business opportunities** ~~D.~~ G. Ensure that where possible, new development benefits local business through local labour and supply chain opportunities. **Supporting Text:** 5.0.1 Across Harrow, employment land is predominately located within designated town centres, local neighbourhood parades, and across industrial land (SIL/LSIS/undesignated sites). These established areas remain the appropriate locations for employment and provide opportunities for residents of Harrow to work locally or set up their own business. Outside of these areas, existing uses or institutions may provide opportunities to cluster increased employment floorspace to support their ongoing success and function. The Council will work with such uses or institutions to be understand their needs and work to assist in delivering the appropriate floorspace to assist with meeting their needs. The Council will continue to work towards implementing its Economic Strategy where it assists in delivering against the targets set out in the London plan, but also job creation across the wider borough. 5.0.2 Employment floorspace and how it is used has changed dramatically over the last decade, with changes to shopping habits, such as online purchasing and ease of delivery / returns of goods. This has led to a reduction in the need to physically visit many of the traditional shopping outlets, such as high streets and shopping centres. There has been a notable impact on the way in which town centres are used, and what role they now play in terms of being a destination for retail and leisure. Compounding this, the Coronavirus pandemic exacerbated impacts on struggling businesses which relied upon footfall traffic, and in many cases resulted in business closure. The Harrow Economic Needs Study 2023 however sets out that Harrow Metropolitan Town Centre and Harrow's District Centres have not followed this trend, with vacancies below the national average. However, the churn in shops has been positive in Harrow Metropolitan Town Centre, with new shops outnumbering closures, which again is supported by the vacancy rates noted above. 5.0.3 Given the recent changes set out above, it is not yet possible to fully understand if the short-term impact will continue into the medium and longer term. The Council will continue to monitor changes to the economic climate and the floorspace requirements across the Borough. 5.0.4 Harrow Council has undertaken relevant evidence base work to determine the amount of employment floorspace is required to meet the needs of the Borough to cover the Local Plan period to 2041. The West London Economic Land Review 2021/22 provided an update to the West London Employment Land Evidence (WLELE) Study (2019) and sets out an update to the	Modification to original Part C (renumbered to Part F) to include industrial floorspace requirements over the period to ensure the policy is consistent with national policy. Modification to original Part C (renumbered to Part F), sub-paragraphs c and d to remove references to Use Classes to provide flexibility and clarity to the policy and improve its effectiveness.

Ref	Chapter /page/policy number	Modification	Reason for Modification
		employment projections and resulting land requirements. Specifically, this evidence base relates to industrial employment floorspace, with the projections set out below (with commentary in relation to the Coronavirus pandemic). 5.0.5 The Harrow Economic Needs Study (ENS) for Town Centres and Offices was completed in January 2024, and provides a quantitative and qualitative assessment of the needs for new retail, leisure and other main town centre uses within the Borough. The report also provides an office market update to the Economic Development Needs Assessment (EDNA) 2017. ~~5.0.6 The evidence base has set out that over the plan period, the following floorspaces will be required:~~ ~~(a) Combined retail, food / beverage, leisure and entertainment - 13,900sqm~~ ~~(b) Industrial – 6,000sqm~~	Delete paragraph as floorspace requirements are now within policy for effectiveness
MM32	Policy SP05 up to 5.0.28 pp177-180	**Strategic Policy 05: Harrow & Wealdstone Opportunity Area** The Harrow & Wealdstone Opportunity Area comprises three distinct sub-areas, as shown on the Policies Map: Harrow Metropolitan Town Centre ~~and surrounding area~~, Station Road, and Wealdstone District Town Centre ~~and surrounding area).~~ Each of these sub-areas have a distinct character and serve different functions. The Council will support new development that responds to the specific characteristics and intended function of each of the sub-areas. A. The Council will direct and support development within the Harrow & Wealdstone Opportunity Area, where it assists in the growth and regeneration of the Area, and delivers against the growth potential identified in the London Plan (2021) through: a. Supporting the delivery of a minimum of ~~5000~~ 8,300 well-designed homes that achieve the homes needed across the Opportunity Area; b. Supporting the delivery of a non-residential town centre floorspace into the Opportunity Area, supporting employment floorspace to meet the evidenced needs of the borough and wider West London sub-region; c. Supporting the intensification and modernisation of existing employment and industrial floorspace, consistent with policy LE3 Industrial Land; d. Ensuring new development ~~conserves and~~ preserves or enhances the significance of heritage assets; e. Working with strategic partners to deliver more sustainable transport modes to serve the Opportunity Area, wider borough and sub-region; f. Working with strategic partners and funding bodies to assist in the delivery of essential infrastructure to support new development across the Opportunity Area. ~~B. The Council will seek to support comprehensive development where it meets the policies of the wider development plan, and where relevant, masterplans that have been prepared for each of the sub-areas.~~ C. The Council will ensure that development within areas of the Opportunity Area that are not capable of facilitating significant change (such as those outside town centres and allocated sites) remain appropriate to their locations, and that the impacts of development on areas in close proximity to the Opportunity Area are appropriately managed. **Harrow Metropolitan Town Centre** D. Harrow Town Centre is classified as a Metropolitan Town Centre. The Council will support proposals that strengthen this classification, and where they: a. Reinforce the St Ann's Road, Station Road and the St George's and St Ann's primary shopping areas as the focal point for new appropriate town centre development;	Modification to introductory paragraph to SP05 to reference sub-areas, delete reference to surrounding areas and include reference to Policies Map to provide clarity about the areas being referred to, ensuring the policy is effective. Modification to Part A.a and A.b to reference actual homes and jobs to be delivered (rather than indicative London Plan figures) and to include non-residential floorspace to ensure the policy is justified and consistent with national policy. Modification to Part A.d to ensure that the terminology is consistent with national policy Delete Part B as it repeats refence to other parts of the development plan Modification to Part C to ensure the policy is effective and justified.

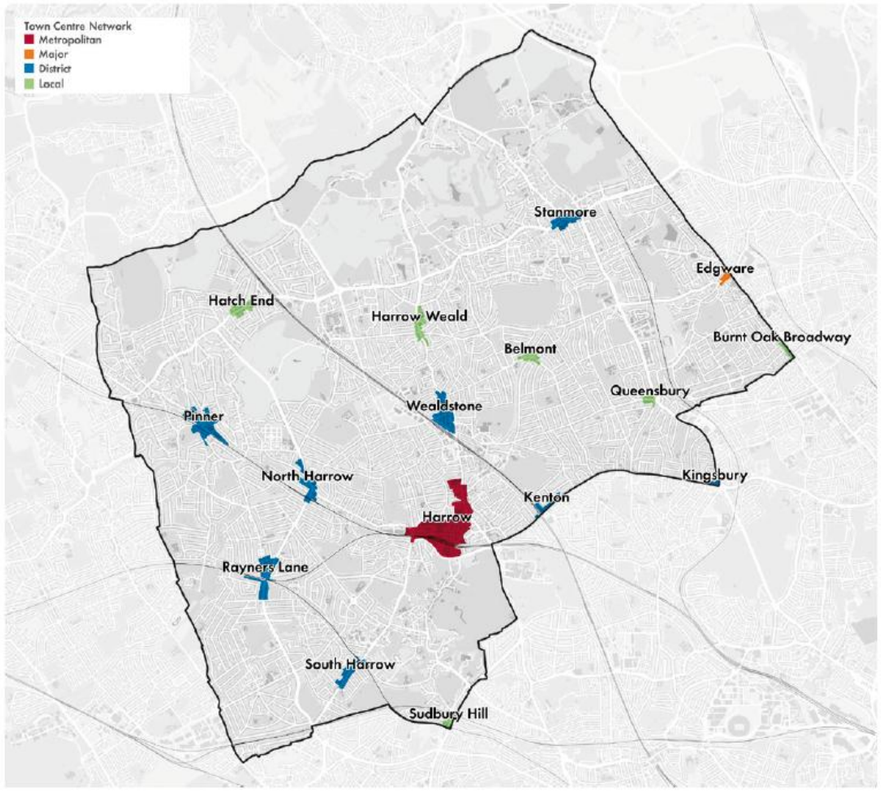
Ref	Chapter /page/policy number	Modification	Reason for Modification
		b. Reinforce the centre as a primary location for office, retail, evening and night-time economy, and leisure use within the borough and prioritise experiential uses to increase footfall and dwell time; c. Provide flexible floorspace / premises that allows for multiple uses that can contribute to both daytime and night-time economies; d. Include mixed use schemes incorporating appropriate ground floor commercial uses with active frontages; e. Improve ~~the pedestrian~~ walking connectivity and ~~walking~~ environment throughout the Metropolitan Centre; f. Car parking is provided in line with London Plan standards, including Electric Vehicle charging points; and g. Support improvements to sustainable transport connections to the wider borough; ~~f.~~h. Ensuring new development conserves and enhances the significance of heritage assets including the Harrow on the Hill Conservation Area; and~~.~~ i. Include new residential development to support the regeneration of the Opportunity Area. ~~E. Proposals that fail to comply with the above will be resisted.~~ ~~F. New development must address the principles and objectives within the Harrow Town Centre Masterplan.~~ **Station Road** ~~**G.**~~ **E.** Development along Station Road linking Wealdstone District Centre and Harrow Metropolitan Town Centre must make a positive contribution to its environment and identity. Proposals should: a. Be of a massing, bulk, scale and a high-quality design that optimises land, consistent with the sub-areas inclusion within the broader Opportunity Area (being a designated area suitable for substantial change), whilst ensuring a satisfactory relationship with the surrounding suburban character area which is a much lower density; b. Provide active, viable and serviceable non-residential ground floor frontages; ~~and~~ c. Contribute to planned improvements to the public realm and road junctions, including the creation of a green boulevard, which improves the environment and active transport linkages between the two centres; and~~.~~ d. Include new residential development to support the regeneration of the Opportunity Area. **Wealdstone District Town Centre** ~~**H.**~~ **F.** Development with the Wealdstone Town Centre will be required to strengthen the vibrancy and vitality of the district centre and improve the environment and identity of Wealdstone as a location for business, industrial activity and family living. Proposals will be supported where they: a. Are of a massing, bulk, scale and a high-quality design that optimises land within an area designated suitable for substantial change, whilst ensuring a satisfactory relationship with the surrounding low density suburban character; b. Contribute to planned improvements to the public realm. Specifically, this includes improvements to the Harrow & Wealdstone Rail & Underground Station and surrounds to overcome perceptions of crime and poor safety, and to respond to the climate change emergency (including flooding) and for safe and efficient pedestrian and cycle use; c. Improve sustainable movement connections from Wealdstone Town Centre to the planned regeneration developments and large scale allocated sites within the vicinity of the town centre; and ~~d. Provide a design that respects, and reinforces the centre's heritage and character in relation to architecture, streetscape, road layout and its relationship with the wider suburban character area; and~~ ~~e. Modernise and intensify Wealdstone Industrial Land and Premises across all levels of the industrial land hierarchy (see Policy LE3 Industrial Land);~~ d. Include new residential development to support the regeneration of the Opportunity Area.	Modification to Part De to provide clarity and improve effectiveness. Modification to add Part Di to provide clarity of the role of residential use and ensure the policy is effective and consistent with national policy. Modification to remove Part E to ensure the policy is positively worded. Modification to remove Part F to remove repetition within the Local Plan Modification to add part d to original Part G (to become Part E) to provide clarity of the role of residential use in this sub area and ensure the policy is effective and consistent with national policy.

		Supporting Text 5.0.27 Opportunity Areas are identified under the London Plan as significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. The Harrow and Wealdstone Opportunity Area offers significant opportunity for urban renewal and intensification, providing the impetus to regenerate Wealdstone and strengthen Harrow town centre. Capacity exists to deliver substantial employment growth through an uplift in retail, office and hotel development within the town centres and the intensification of industrial and other business uses within the Wealdstone Area. Under the previous Local Plan, a significant amount of Strategic Industrial Land was released with the closure of the Kodak site. There is scope to accommodate a substantial portion of the Borough's future housing need through the delivery of higher density residential and mixed-use development on key strategic sites where development is matched by investment in infrastructure and achieves a high standard of design. 5.0.28 The London Plan (2021) requires the Harrow & Wealdstone Opportunity Area to secure a minimum of 5000 homes and 1000 jobs over the plan period. Strategically, the Council will seek to deliver a minimum of ~~7,500~~ 8,300 homes ~~on permitted and allocated sites~~ due to the highly sustainable location and the capacity to accept a higher density of development (see Strategic Policy SP03). The Opportunity Area has a significant proportion of town centre employment floorspace, which will be retained, and where possible new floorspace will be delivered. Retaining or re-providing the existing uses within all industrial sites, especially where heavy industry (B2 / B8 or similar Sui Generis Use) is currently occupying the site is encouraged. This approach will seek to optimise the employment space available within the Opportunity Area ~~and assist in the delivery of a minimum of 1,000~~ 1,268 ~~jobs within the Opportunity Area.~~ The Council will seek to deliver the minimum homes and jobs required by the London Plan (2021) and will work with strategic partners in conjunction with the use of the Community Infrastructure Levy to ensure that there are sufficient infrastructure improvements to support the anticipated new development. 5.0.29 Policy SP05 addresses development within the Harrow & Wealdstone Opportunity Area, with three sub areas specifically identified within it, as shown on the Policies Map. All new development within the Harrow & Wealdstone Opportunity Area should address SP05A, as this is relevant to all of the Opportunity Area. Development within any of the sub areas should address SP05A and the relevant sub area policy within which it is located within. It is noted that there is some overlap between Harrow Metropolitan Town Centre sub-area and Station Road sub-area, which seeks to pick up underlying land use designations and also the changing character of the respective sub-areas (and wider context). New development located in both sub-areas should address all relevant sub-area parts of Policy SP05.	Modification to Parts H d and e (to become Parts F d and e) to remove repetition and ensure an effective policy Modification to include Part Hd (to become Part Fd) to provide clarity of the role of residential use in this sub area and ensure the policy is effective and consistent with national policy. Modification to delete 'permitted and allocated sites' in para 5.0.28 to reflect that windfall development will also come forward within the Opportunity Area, to ensure flexibility and effectiveness. Modification to para 5.0.28 to update homes and jobs to be delivered within the Harrow & Wealdstone Opportunity Area, to ensure the supporting text is consistent with the policy New 5.0.29 proposed to define the extent of sub-areas in the Opportunity Area; necessary to ensure policy effectiveness.

Ref	Chapter /page/policy number	Modification	Reason for Modification
		<u>Map showing Harrow and Wealdstone Opportunity Area and Sub-areas (referred to in Policy SP05)</u>  	

Ref	Chapter /page/policy number	Modification	Reason for Modification
MM33	Policy LE1 up to 5.1.14 pp185-187	**Policy LE1: Development Principles within centres and parades ~~& Town Centre Hierarchy~~** A. The council will support within ~~town~~ metropolitan, major, district and local centres, and neighbourhood parades, developments that ensure an appropriate mix of main town centres uses, or that demonstrably contribute to the vitality and vibrancy of the centre or parade, as defined on the Policies Map, and in Appendix 4: a. Within the Harrow Metropolitan Town Centre and District Centres the following designations apply (as shown on the Policies Map): i. Primary Shopping Area – Defined area where retail development is concentrated; ii. Primary Shopping Frontage – The main frontages within the Primary Shopping Area, where retail uses will be focused; and iii. Secondary Shopping Frontages – Active frontages within the centre where a wider range of main town centre uses will be encouraged. b. Within Local Centres, the following designations apply (as shown on the Policies Map): i. Local Shopping Frontages- Active frontages within the centre where main town centre uses will be appropriate. c. Within the major town centre at Edgware, the following designations apply (as shown on the Policies Map): i. Secondary Shopping Frontage- Active frontages within the centre where main town centre uses will be encouraged. d. Neighbourhood Parades – Active frontages where main town centre uses will be appropriate. ~~A~~B. The Council will support within ~~town~~ metropolitan, major, district and local centres, and neighbourhood parades, developments that: a. Demonstrably contribute to the vitality and vibrancy of the town centre or parade; b. Are ~~of a scale and intensity~~ commensurate to the size and role of the centre or parade it is located within; c. Provide an appropriate mix of uses within a shopping area or parade, ~~ensuring an over proliferation of Sui Generis uses does not occur;~~ d. The ground floor would have an accessible and active frontage; and e. Community facilities in town centres are able to be supported by the Council where compliant with Policy CI1. ~~B~~C. The Council will support mixed-use developments in ~~town~~ metropolitan, major, district, and local centres and neighbourhood parades where: a. The ground floor element complies with ~~A~~B; b. There is a clear and satisfactory delineation of access and servicing arrangements (bin store, cycle storage) between ~~the two~~ uses; and c. There is satisfactory mitigation in accordance with the Agent of Change (Policy D13 of the London Plan (2021)). ~~C.~~ D. Residential uses will be supported within centres. Provision for access to the residential element will only be appropriate where any resultant loss of active frontage or floorspace within ~~on the ground floor in any~~ the Primary Shopping Area, town centre frontages (primary and secondary) or neighbourhood parades is carefully managed. ~~will not be supported.~~ ~~D.~~ E. The loss of appropriate town centre uses ~~community facilities~~ and social infrastructure from ~~town centres~~ metropolitan, major, district, and local centres and neighbourhood parades will ~~not~~ only be supported ~~unless~~ where compliance with policy ~~C~~SI1 is demonstrated. ~~E.~~ F. Temporary events such as markets and entertainment uses will be supported in metropolitan, major, district, and local centres and neighbourhood parades where: a. They are supported with a management plan agreed by the Council; and b. They do not impact on residential amenity or highway safety.	Modification to Policy Title to provide clarity and improve effectiveness. Modification to renumbered Part A include specific reference to town centres to ensure an effective policy and consistency with national policy. Modification to renumbered Part A to include parts a – d, referencing all town centres and neighbourhood parades, and the designations within them (as shown on the Policies Map). Modification required to ensure an effective policy and consistency with national policy. Modification to renumbered Part B (previously A) to include reference to town centres to ensure an effective policy. Modification to Part B.b to remove text not necessary for the test of soundness. Modification to Part B.c to remove text not necessary for the test of soundness. Modification to renumbered Part C (previously B) to provide clarity of location for such development, to ensure the policy is effective Modification to original Part C (to become new D) to provide clarity for support of residential on the identified areas, to ensure the policy is positively worded and effective Modification to original Part D (to become new E) to correct terminology / policy reference to be consistent with remainder of Local plan and provide clarity on locations, to ensure an effective policy. Modification to also ensure policy is positively worded.

Ref	Chapter /page/policy number	Modification	Reason for Modification
		~~F. The Council will resist the loss of any employment, leisure (excluding Sports and Recreation) or cultural uses within that provides essential day to day amenities. The loss of such uses will only be accepted where 24 months of satisfactory marketing has been undertaken.~~	Modification to Part E (to become new F) to provide clarity on locations to ensure an effective policy
		G. Proposals for new retail and leisure development in out of centre locations will ~~be resisted.~~ only be supported where they: ~~Any such out of centre developments must:~~ a. Undertake a sequential test to demonstrate that there are no appropriate town centre sites, followed by edge of centre sites; b. ~~Be~~ Are supported by an Impact Assessment for proposals where the floorspace exceeds 400 square meters to demonstrate no harm to centres within their catchment; and c. ~~Be supported by a Green Travel Plan to enhance sustainable access between the site and the town centre network.~~ d. Are for a leisure use demonstrate that it is located within an identified area of deficiency or an identified area for future need	Deletion of original Part F to avoid duplication with other parts of the Local Plan Modification to Part G to ensure policy is positively worded
		H. Development resulting in the loss of a main town centre use must be accompanied by marketing evidence demonstrating that there is no longer demand for the existing use, as set out in Appendix 6. ~~The release of office floorspace will be supported where the sequential approach below has been applied in the following order:~~ ~~a. Vacant floorspace outside of designated town centres;~~ ~~b. Vacant floorspace within designated Major, District or Local Town Centres;~~ ~~c. Poor quality floorspace within designated Major, District or Local Town Centres; and~~ ~~d. Floorspace within the Harrow Metropolitan Town Centre.~~ ~~H.1 Where the building has been vacant for more than 12 months and there is genuine evidence that all opportunities to re-let the accommodation have been fully explored, including evidence of suitable marketing over a 12-month period for office use or other appropriate employment or community uses.~~	Modification to Part G.c to delete policy that is addressed in other part of the Local Plan Modification to Part H to provide clarity to the decision maker in relation to marketing (including reference to new Appendix 6) and deletion of remaining Part Ha-d and Part H1. Modifications ensure the policy is effective
		Supporting Text 5.1.1 Outside of the Harow & Wealdstone Opportunity Area, the Borough's network of town centres comprises: part of one major centre, eight district centres and five local centres as set out on the Policies Map. ~~(Appendix 4).~~ Town centres form a central part of the London Plan's spatial strategy for outer London and are at the heart of Harrow's spatial strategy for areas of the Borough beyond the Harrow & Wealdstone Opportunity Area. They give Harrow's districts their sense of individual identity and provide the basis for sustainable urban living, being inextricably connected with the public transport network. As the demographics and retail behaviour of residents has evolved, the character of the Borough's centres has changed and many now have a complimentary rather than principal role in meeting residents' shopping needs. Nevertheless, they still have a role; it therefore remains important to sustain and where possible enhance the vitality and viability of the Borough's town centres. 5.1.2 Harrow's network of town centres and their classifications are well established. Local parades of shops supplement the capacity of town centres by providing small walk-to convenience shops and facilities that serve the neighbourhood in which they are situated. A total of 34 Neighbourhood Parades have been identified within Harrow and are an important part of the Borough's suburban fabric playing an important role in the day to day living of residents, particularly within the suburban areas of Harrow. These are set in Appendix 4.	Modification to para 5.1.1 to link the town centres identified within the policy above to the polices map and provide consistency.

Ref	Chapter /page/policy number	Modification	Reason for Modification
		Town Centre Hierarchy  5.1.3 The Harrow Economic Needs Study (2023) (ENS (2023)) provides an updated appraisal of town centre economic uses initially set out in the Economic development Needs Assessment (2017), setting out the significant changes that have occurred over this timeframe and the impact that this has had on town centres generally across London, and in Harrow. It has undertaken a quantitative and qualitative assessment of the need for new retail, leisure and other main town centre uses within LB Harrow. 5.1.4 Across the Local Plan period (to 2041), the floorspace projections are as follows; 1) Combined retail, food /beverage, leisure and entertainment: 13,900sqm a) Retail (Convenience & Comparison): 800sqm b) Food and Beverage; 13,100sqm c) Leisure, Entertainment and Culture: 7,000m^2	Modification to para 5.1.4 to update the non-residential floorspace needs to reflect the policy to ensure consistency
MM34	Policy LE2 pp191-192 Policy only	**Policy LE2: Night-time and Evening Economy**	

Ref	Chapter /page/policy number	Modification	Reason for Modification
		A Within the Harrow Metropolitan Town Centre, proposals which enhance the evening and night-time economy will be supported where: a. They make a positive contribution to the vitality and vibrancy of the centre; b. They satisfactorily mitigate any negative parking or traffic implications; c. They appropriately address the agent of change principle as set out in Policy D13 of The London Plan (2021); d. They demonstrate that the evening or night-time use will provide an active frontage during daytime hours; and e. They satisfy the principles set out within the Harrow Metropolitan Town Centre Masterplan. B. Proposals which enhance the evening economy of town centres outside of the Metropolitan Town Centre will be supported with regard to: a. The role and function of the centre; b. Their positive contribution to the vitality and vibrancy of the centre; c. The satisfactory mitigation of any negative parking or traffic implications; and d. The agent of change principle as set out in Policy D13 of The London Plan (2021). B.1 Proposals should demonstrate evening or night-time uses will remain active during daytime hours where possible. C. Proposals for the redevelopment of night-time or evening economy use to provide a mixed-use scheme will be supported where: a. There is a sufficient reprovision of the existing floorspace; b. Adequate separation of access and servicing between the different uses is achieved; c. The agent of change principle as set out in Policy D13 of The London Plan (2021) has been addressed; and d. Wider policies within the development plan are complied with. ~~D. All new proposed night-time activities must seek to ensure all residents are able to participate in nighttime activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community.~~ ~~E. Proposals that would compromise any component of this policy, or would be detrimental to the vitality and viability of town centres, will be refused.~~ ~~E~~D. The loss of facilities that contribute to the evening and night-time economy will be resisted unless; a. Appropriate marketing ~~of no less than 24 months~~ in accordance with guidance set out within Appendix 6 to demonstrate they are surplus to requirement; or b. There are suitable facilities within the centre that adequately provide for this use.	Modification to Part D to delete as matters are addressed within other policies within the Local Plan. Modification deletes duplication and ensures the policy is effective Modification to delete Part E to ensure policy is positively prepared and effective. Cross-reference added to Appendix 6 for effectiveness.
MM35	Policy LE3 pp194-195 Policy only	**Policy LE3: Industrial Land** The Council will support new development of industrial floorspace within appropriate locations, where they accord with other relevant policies within the development plan. **A. Strategic Industrial Locations (SIL)** a. Proposals to intensify, increase or modernise floorspace and premises within SIL will be supported where the uses fall within the industrial-type activities below: 1) General Industry ~~(B2)~~ and similar ~~Sui Generis~~ uses	

Ref	Chapter /page/policy number	Modification	Reason for Modification
		2) Storage and logistics/distribution ~~(Use Class B8)~~ 3) Secondary materials, waste management and aggregates 4) Utilities infrastructure (such as energy and water) 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure 6) Wholesale markets 7) Emerging industrial-related sectors 8) Flexible ~~(B2/B8)~~ industrial/warehouse hybrid space to accommodate services 9) Low-cost industrial and related space for micro, small and medium-sized enterprises b. New & emerging industrial uses must demonstrate need and operational compatibility with the wider SIL. c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators. d. Any net loss of industrial floorspace and premises within a SIL will not be supported. e. Proposals that ~~fall within use classes E(g) (ii) & (iii)~~ would be suitable to be located in a residential area will be resisted from being located within SIL, and will only be supported where demonstrated to support an existing ~~Use Class B2 or B8~~ industrial or warehousing type use. ~~A.1~~ f. ~~Co-location of residential within a SIL will not be supported~~. Development in SIL should contribute to the operation of the industrial area, with any use subject to London Plan Policy D13. **B. Locally Significant Industrial Sites (LSIS)** a. Proposals to intensify, increase or modernise floorspace and premises within LSIS will be supported where the uses fall within the industrial-type activities below; 1) General Industry ~~(B2)~~ and similar ~~Sui Generis~~ uses 2) Storage and logistics/distribution ~~(Use Class B8)~~ 3) Secondary materials, waste management and aggregates 4) Utilities infrastructure (such as energy and water) 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure 6) Wholesale markets 7) Emerging industrial-related sectors 8) Flexible ~~(B2/B8)~~ industrial/warehouse hybrid space to accommodate services 9) Low-cost industrial and related space for micro, small and medium-sized enterprises b. New & emerging industrial uses must demonstrate need and operational compatibility with the LSIS. c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators. d. Any net loss of industrial floorspace and premises within a LSIS will not be supported. e. Proposals that ~~fall within use classes E(g) (ii) & (iii)~~ would be suitable to be located in a residential area will be resisted from being located within LSIS, and will only be supported where demonstrated to support an existing ~~Use Class B2 or B8~~ industrial or warehousing type use. ~~B.1~~ f. Co-location of residential within a LSIS will only be supported where these have been progressed through the Local Plan process or have a Masterplan agreed with the Local Planning Authority. **C. Non-designated Industrial Land** a. Proposals to intensify, increase or modernise floorspace or premises within non-designated industrial sites will be supported where the uses fall within the industrial-type activities specified within Policy A.a above, and subject to compliance with other relevant policies within the development plan. b. Mixed use schemes will be supported where they comply with the criteria set out within Policy E7C of the London Plan 2021.	Modification to Part A to remove references to Use Class Order to ensure the policy is flexible and effective Modification to Part A.f to ensure policy is positively prepared and effective Modification to Part B to remove references to Use Class Order to ensure the policy is flexible and effective.

Ref	Chapter /page/policy number	Modification	Reason for Modification
		D. Non-industrial uses on industrial land. a. Proposals that seek to introduce non-industrial uses within an industrial site must demonstrate the ancillary nature of the non-industrial use, or satisfactorily demonstrate it is unable to be located elsewhere within the borough with respect to the principle of development. b. Non-industrial uses that are not satisfactorily demonstrated as being ancillary to an industrial use or not demonstrated as being able to be located elsewhere within the Borough will not be supported.	
MM36	Policy LE5 up to para 5.5.6 pp204-206	**Policy LE5 Tourism and Visitor Accommodation** A. Proposals for new hotel development and serviced apartments will be directed towards Harrow Town Centre and the wider Harrow & Wealdstone Opportunity Area. Proposals for new hotel development and serviced apartments outside of the Harrow & Wealdstone Opportunity Area will be directed to sites in accordance with the following sequential order of preference: a. town centres; b. edge of centre; c. highly sustainable locations B. Subject to compliance with A above, new tourism infrastructure will be supported where: a. the size and character of the site or building are suitable for the proposed use; b. the internal layout provides an appropriate balance between guest sleeping areas and ancillary floorspace (such as reception and dining areas, and staff facilities) commensurate to the use to enable its successful operation b. the development will be compatible with the character and appearance of the area; c. the residential amenities of local residents will not be harmed by way of noise, disturbance, loss of light or privacy; d. it provides a choice of accessible accommodation in accordance with Policy E10H (Visitor Infrastructure) of the London Plan (2021); e. it would not result in an over-concentration of the type of accommodation within the locality; f. there will be good access and links or opportunities for good access and links to modes of transport other than the private vehicle; and g. vehicle access to and from the highway will be safe. h. there are adequate access, drop-off/pick-up and servicing arrangements; C. The Council will resist the loss of tourist infrastructure. Any loss of tourism infrastructure will only be supported where: a. There is no longer a need for that facility; or b. The redevelopment of the site would result in an over-riding public benefit; and c. Any change in use or redevelopment complies with other policy requirements of the development plan. <u>d. There would be no net loss from the borough stock over the plan period through reprovision within the borough.</u> D. The use of a residential property for temporary sleeping accommodation (short term let or holiday let) must not exceed 90 nights within a calendar year. Proposals seeking to exceed this will require planning permission and must consider: a. The loss of a single-family home b. Car parking c. Residential amenity E. To assist with the circular economy, proposals for tourism accommodation should provide a statement to demonstrate how in the future the design of the proposal could allow its conversion into other uses appropriate for its location.	Modification to Part C.d to ensure consistency with the London Plan. Glossary updated to reflect marketing.

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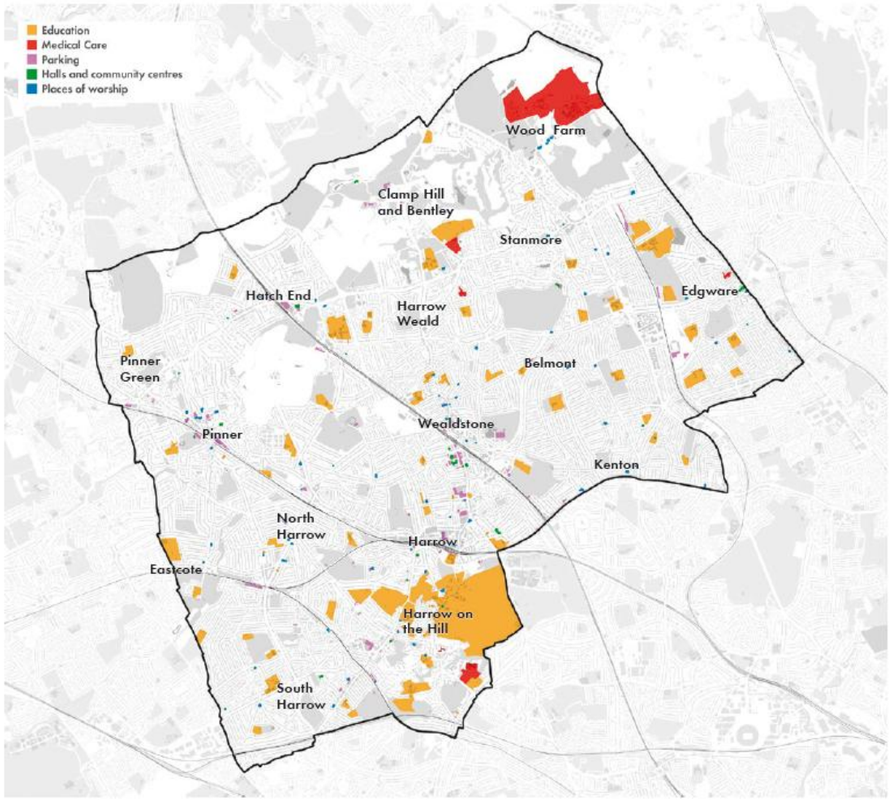
		Supporting Text 5.5.1 In addition to the 11th Century St Mary's Church, Harrow boasts tourist attractions that include Bentley Priory Museum, Headquarters to Fighter Command during the Battle of Britain, Harrow-on-the-Hill, West House, and Headstone Manor and Museum celebrating 1200 years of local history and including The Great Barn once owned by Henry VIII. 5.5.2 As an outer London borough, Harrow's tourism economy is still an integral part of the local and wider economy. A strong tourism economy provides opportunities for local residents through jobs and supports local businesses across the borough. The London Plan (2021) estimates that an additional 58,000 bedrooms of serviced accommodation will be needed in London by 2041 ~~and also set out a requirement for Harrow to deliver 347 rooms~~. The Harrow Economic Needs Study (2024) noted the impact of the Coronovirus pandemic, and forecasts that 270 rooms to be provided within Harrow from 2023 – 2041. The Council will look to meet the demand as set out above through supporting appropriate new and retaining existing hotel / tourist accommodation in appropriate locations. 5.5.3 The Borough has excellent links into central London, enables convenient public transport for visits to central London, Wembley Stadium and Wembley Arena and accommodation is often competitively priced. Covid19 has had a significant impact on the tourism infrastructure globally, with London being no exception. There was a sharp fall across the hospitality sectors within West London and Harrow, and most notably in accommodation and food services[25]. However, following the easing of restrictions imposed in relation to Covid19, the sector saw some of the fastest (temporary) recoveries. Notwithstanding any recovery, it is anticipated that the sector will progress with a lower work force than pre-pandemic. 5.5.4 Notwithstanding the convenient links into central London, tourism accommodation also provides opportunities to visit local attractions. Specifically, Harrow boasts attractions such as Harrow School, and a number of museums including Heath Robinson, Headstone Manor, and Bentley Priory. The Council has invested in a number of attractions within the borough, with the aim to make these more accessible for the visiting public and viable as an attraction. 5.5.5 New hotel and leisure development is directed into the Harrow town centre, reflecting its Metropolitan centre status and in support of the Harrow & Wealdstone Opportunity Area objectives. Throughout the rest of the Borough, the Council will expect proposals for hotel development and other forms of tourism accommodation to locate in town centres to avoid impacts on residential amenity and to benefit from good public transport links and local services. 5.5.6 Given the London-wide demand for tourism infrastructure, a sufficient supply and range of serviced accommodation should be maintained. ~~specifically in relation to a range of tourism accommodation, any loss of such a use would not contribute to meeting the requirements across the plan period~~. Proposals that seek to reduce tourism infrastructure within the borough will be resisted, unless supported by robust justification. A marketing exercise ~~covering a minimum continuous period of 24 months~~ must be carried out in accordance with Appendix 6 and be shown to be unsuccessful ~~including details of commercial agents, advertisements and lease terms offered must support any such application~~. Submitted evidence should accord with the guidance set out in Appendix 6. ~~will be reviewed by a suitably qualified professional to ensure appropriateness of the marketing~~. Alternatively, proposals that result in a loss of tourism infrastructure that would form part of a comprehensive development, and which is demonstrated to result in an over-riding public benefit, will be supported.	Modification to para 5.5.2 to provide clarity and consistency with Local Plan evidence base to ensure an effective and justified policy Modification to para 5.5.6 to ensure consistency with the policy and providing reference to relevant marketing approach (Appendix 6), to ensure an effective policy.

[25] https://wla.london/wp-content/uploads/2021/04/2021-April-Oxford-Economics-Report-Refresh-how-has-Coronavirus-impacted-the-West-London-economy.pdf.

Chapter 6 – Social and Community Infrastructure

Ref	page/ policy/ para	Modification	Reason for Modification
MM37	Chapter title, p209	**Chapter 06: Social ~~and Community~~ Infrastructure**	Chapter heading amended to reflect definition of social infrastructure in the glossary, which includes a full range of social / community infrastructure, in order to ensure the policies within the chapter are effective. Policy prefixes also amended from CI to SI to reflect this.
MM38	Policy SP06 pp209-210	**Strategic Policy 06: Social ~~and Community~~ Infrastructure** A. Development ~~must~~ should contribute to the protection, enhancement and additional provision of ~~community services and facilities; physical,~~ social~~, green and blue~~ infrastructure~~,~~ to adequately address the Borough's existing and future needs. This will be achieved through: a. Ensuring new development and growth is co-ordinated and phased in tandem with the provision of appropriate ~~physical and~~ social infrastructure; b. ~~Requiring proposals for new development to be provided on off site to serve the development~~ Ensuring proposals for new development are supported by adequate existing infrastructure and new infrastructure is secured where necessary through appropriate funding mechanisms including the Community Infrastructure Levy (CIL) or any subsequent mechanisms, and/or site specific legal agreements; c. Supporting t~~T~~he development or expansion of ~~physical or~~ social infrastructure, where it is needed to serve existing or proposed development, or required to meet projected future requirements; and d. ~~Resisting~~ Managing any ~~the~~ loss of social ~~community~~ infrastructure by ensuring ~~unless~~ adequate arrangements are in place for ~~their~~ its replacement or the enhancement of other existing facilities contributing to an overall improvement in local provision. ~~e. Requiring all development to contribute to the delivery of strategic infrastructure identified in the Infrastructure Delivery Plan; and~~ ~~f. Utilising the Community Infrastructure Levy (CIL) or any subsequent mechanisms to fund the maintenance and provision of infrastructure through legal agreements.~~ **Supporting Text:** 6.0.1 The infrastructure policies in this chapter have been developed in line with the Infrastructure Delivery Plan (IDP 2024). The IDP assesses the current state of infrastructure in Harrow and identifies where additional provision may be required in line with development and population growth. While development is required to create more capacity in our local infrastructure, strategic work must also be undertaken in line with the IDP to use our infrastructure resources more efficiently. 6.0.2 The Council will work with stakeholders to identify any infrastructure capacity issues and deliver required infrastructure. Applicants will be required to assess the impact of their proposals on infrastructure and include measures to facilitate the delivery of new or enhanced infrastructure. Development contributions to infrastructure should be considered in the viability assessment of any proposal.	Modification to policy heading to reflect change to overall chapter title, in order to ensure effectiveness. Deletion of 'must' ensure in part A is positively prepared. Part A now refers to social infrastructure only to reflect policy title / definition of social infrastructure. Reference to green and blue infrastructure deleted as these are covered by other policies in the plan Parts Ab and Af have been amalgamated (revised Part Ab) to avoid repetition and improve the effectiveness of the policy, with Af deleted. Part Ad is reworded to ensure the policy is positively prepared and refers to social infrastructure. Part Ae is deleted as not all development will contribute to strategic infrastructure identified in the IDP.

Ref	page/ policy/ para	Modification	Reason for Modification
		~~**Community uses**~~  ~~**Source: Harrow Characterisation and Tall Buildings Study (2021)**~~ ~~**Note: selection of community uses to illustrate their indicative range and location.**~~	Map deleted as was intended to be illustrative during the development of the draft Plan but does not provide an accurate representation of community uses across the borough over the plan period; this ensures policy is effective and justified.
MM39	Policy CI1 up to 6.1.6 pp211-212	**Policy S~~C~~I1: Safeguarding and Securing Social Infrastructure** ~~New Social Infrastructure~~ A. Proposals will be required to make contributions towards the provision of enhanced or new social infrastructure where additional needs are generated. Infrastructure should be appropriately located to meet these needs~~, in locations where there are existing capacity issues or a need is identified, to support new development~~. B. Proposals relating to new or enhanced social ~~and community~~ infrastructure facilities, including the consolidation of existing facilities, will be supported where they respond to a demonstrable need and: a. Are located in areas easily accessible by public transport, walking and cycling, preferably in town centres or the Harrow and Wealdstone Opportunity Area; b. Are located within the community they are intended to serve; c. Do not adversely impact residential amenity or highway safety; d. Are provided in flexible, adaptable ~~and all abilities accessible~~ buildings that are accessible to all, and preferably co-located with other social infrastructure uses; and e. ~~Must~~ Seek to maximise wider community benefit through utilisation of measures such as community use agreements.	Headings deleted as not necessary for the effectiveness of the policy. Part A amended to clarify when contributions to social infrastructure will be required. Proposals are not required to address existing infrastructure needs, only the additional needs that are generated. This ensures the policy is effective and justified. Part B now reflects the policy title and uses consistent terminology. Modifications to clarify the wording of part B (d) to ensure a more effective policy.

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		~~Existing Social Infrastructure~~ C. The Council seeks to retain and protect existing social infrastructure ~~and community facilities~~ from loss to alternative uses. Any proposals that result in loss of these uses will be resisted, unless proposals can adequately demonstrate that: a. There is no ~~longer a~~ need for the current use or an alternative social infrastructure use (as evidenced by 24 months of effective marketing), ~~and there is no projected future need, or the site is unsuitable for the current use and there is no need for any other suitable community use on the site; and~~ or b. ~~The loss of social infrastructure would not result in a shortfall in provision of that use~~ Redevelopment would secure enhanced social infrastructure reprovision on-site; or c. A replacement facility is provided off site that would better meet the specific needs of existing and future users in regard to quantity, quality and location. ~~d. Redevelopment would secure enhanced social infrastructure reprovision (on or off-site) ensuring continued delivery of social infrastructure and related services.~~ ~~D. Any proposal to redevelop an existing social infrastructure site should prioritise the use of the site for an alternative social infrastructure use.~~	Modifications to increase the flexibility of part B (e) to allow the community access to be delivered by different mechanisms. The provisions of part C and D have been amalgamated to provide a clearer and more effective policy framework. Part D is therefore deleted. Part C (a, b, c and d) are amended to provide a clearer and more effective policy framework. Part C (d) is no longer required as a result of the changes and is deleted.
		Supporting text: 6.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities, as outlined in the London Plan. Sport and Recreation infrastructure requirements are dealt with explicitly in Policy CI3. 6.1.2 Social infrastructure plays an important role in developing strong and inclusive communities. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place. 6.1.3 The council will work closely with the community and stakeholders to identify infrastructure needs across the borough, and work to secure timely delivery of high-quality infrastructure and services. The Infrastructure Delivery Plan (IDP) will be used in conjunction with relevant corporate plans and strategies to plan the roll out of new and improved social infrastructure. 6.1.4 Development must be supported by new or enhanced social infrastructure to ensure that quality of life in the borough is improved. Opportunities for the delivery of enhanced or new infrastructure are scarce due to constrained nature of the built-up area and other development pressures. Therefore, existing social ~~and community~~ infrastructure sites will be protected for ongoing community use where possible. The policy seeks to enable the development of new social infrastructure and the protection of existing facilities from redevelopment pressure to competing land uses. New and improved infrastructure should have no negative impact on the natural environment in line with Chapters 7 and 8.	Paragraphs 6.1.4 and 6.1.6 of the supporting text now refer to social infrastructure to reflect policy title.
		6.1.5 The loss of social infrastructure can have a detrimental effect on communities, therefore it will be avoided unless justified having regard to the overall need for infrastructure in the borough and any site-specific considerations. 6.1.6 Any proposals involving the loss of a ~~community~~ social infrastructure use should be evidenced by 24 months of continuous effective marketing, at a reasonable market rate. Evidence should include various examples of online and local marketing through reputable agents. Where it can be demonstrated that healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the requirements listed under Part C ~~and D~~ of the Policy will not apply. Redevelopment of any facilities	Amendment to clarify key aim when re-providing or redeveloping existing social infrastructure.

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		and subsequent reprovision should improve the experience of existing uses or the facility and incorporate additional capacity to meet future demand.	
MM40	Policy CI2 (policy only) p214	**Policy S~~C~~I2: Play and Informal Leisure** Development proposals that are likely to be occupied or used by children and young people ~~must~~ should increase opportunities for play and informal recreation. A. Development proposals for new housing ~~must~~ should incorporate well-designed and high-quality formal play provision of at least 10 square metres per child. B. Play space provision should be delivered on-site and made accessible to all children in the development. Where development is to be phased, there should be early implementation of play space. All play space ~~must~~ should be designed to: a. Ensure public access is not unreasonably restricted in major developments, b. Provide a safe and stimulating environment for all age groups and abilities represented in the development, c. Provide rest and amenities areas for children and parents (i.e benches, shade, access to water, etc), and d. Incorporate landscaping and permeable surfaces. C. Off-site provision of play and recreation space will only be acceptable in exceptional circumstances, where it is demonstrated that: a. On-site provision is not feasible and there is existing play space, or b. New provision will be delivered within proximity to the development and can be accessed safely and easily by residents. D. Development proposals resulting in the loss of play space should include ~~will be refused unless~~ replacement provision of at least an equivalent amount and improved quality ~~will be provided~~.	Deletion of 'must' to ensure policy is positively prepared. Deletion of 'must' in part A and part B to ensure policy is positively prepared. Deletion of 'will be refused unless' in part D to ensure policy is positively prepared.
MM41	Policy CI3 (policy only) p216	**Policy S~~C~~I3: Sport and Recreation** A. Proposals that would increase the capacity and quality of indoor and outdoor sport and recreation facilities, and those that would secure community access to private facilities, will be supported provided that there would be no adverse impact on residential amenity or highway safety.~~:~~ ~~a. There would be no conflict with Green Belt, Metropolitan Open Land or open space policies;~~ ~~b. The proposal would not have a detrimental impact on any heritage significance or biodiversity assets within or surrounding the site; and~~ ~~c. There would be no adverse impact on residential amenity or highway safety.~~ B. Proposals for uses that would support existing or proposed indoor and outdoor sport and recreational facilities will be supported where they are: a. Ancillary in terms of size, frequency, use and capacity; and b. Do not displace or prejudice facilities needed for the proper functioning of the principal outdoor sport and recreational uses. ~~C. Proposals for floodlighting will be supported where they would:~~ ~~a. Enhance outdoor sport and recreation facilities; and~~ ~~b. Not detrimentally impact the character of open land, the amenity of neighbouring occupiers or biodiversity.~~ ~~D.~~ C. All proposals (excluding minor applications) should facilitate community access to sport and recreation facilities through measures such as a community use agreement, unless it can be demonstrated that it is not feasible. ~~E.~~ D. Proposals which would lead to the loss of, or would prejudice the use of a sports or recreation facility will be resisted unless:	Reference to both indoor and outdoor sport and recreation facilities added to part A to ensure a more effective policy. Part A (a,b and c) amalgamated into Part A to avoid repetition of national planning guidance and clarify that policy relates to both indoor and outdoor facilities, to ensure the policy is effective. Reference to indoor and outdoor facilities added to part B to ensure a more effective policy. Part C is covered by the provisions of GR7 and is deleted to avoid repetition in order to improve the effectiveness of the policy. Additional wording at part D to ensure the policy is sufficiently flexible

Ref	page/ policy/ para	Modification	Reason for Modification
		a. Any loss of facilities would be replaced by equivalent or better provision in terms of quantity and quality, in a suitable location ~~in accordance with Policy CI1 (Safeguarding and securing new Social Infrastructure)~~; or b. The development is for alternative sports and recreational provision for which the identified need clearly outweighs the loss of the existing facility.	Cross reference to CI1 (now SI1) in Original Part E (a) [renumbered to Part D(a)] is not necessary for soundness and is deleted.

Chapter 7 – Green Infrastructure

Ref	Chapter /page/policy number	Modification	Reason for Modification
MM42	SP07 pp222-224	**Strategic Policy 07: Green Infrastructure** A. Green infrastructure should be identified, protected, restored, enhanced, and extended. The planning, design, and management of green infrastructure should maximise its benefit and enhance public access. ~~be integrated, and the context carefully considered to ensure the most appropriate benefits are targeted maximised and maintained.~~ ~~B. Access to green infrastructure will be enhanced where appropriate.~~ ~~C. Green Belt and Metropolitan Open Land (MOL) will be protected from inappropriate development in line with Policy GI1 (Green Belt and MOL).~~ ~~D.~~ B. ~~Development will not be permitted on designated open space, other than for s~~ Small-scale, ancillary facilities needed to support or enhance the proper functioning of ~~the~~ open spaces will be supported in line with Policy GI2 (Open Space), ~~the only exception to this would be~~ including for sporting facilities in line with Policy CI3. ~~E.~~ C. There should be no net loss of green ~~space~~ infrastructure in the borough. Additional green ~~space~~ infrastructure provision will be supported. ~~F The quality and functionality of green infrastructure will be enhanced.~~ D. ~~G.~~ Biodiversity should be enhanced both retrospectively and in new development, particularly where this will strengthen local ecological networks or address deficits in line with policy GI3 (Biodiversity); E. ~~H.~~ Drainage is considered, and flood risk reduced giving priority to natural SuDS provision in line with Policy CN4 (Sustainable Drainage); F. ~~I.~~ Green ~~space~~ infrastructure should be multifunctional providing a range of ecosystem services and benefits, targeting local need G. ~~J.~~ Green ~~spaces~~ infrastructure, which itself may have heritage value, should support the historic environment through ~~their~~ it's ability to enhance heritage assets and link to local history; H. ~~K.~~ The retention and integration of existing trees, and new tree planting, will be encouraged, in line with Policy GI4 Urban Greening, Landscaping and Trees; I. ~~L.~~ Local food growing measures (allotments, urban gardens, stop and grow) will be supported in line with Policy GI5 (Food Growing); and J. ~~M.~~ Opportunities for cross-borough collaboration and the consideration of green infrastructure in an integrated way as part of a network will be pursued.	Parts A, B and F are amalgamated to avoid repetition and improve the effectiveness of the policy (Parts B and F are deleted). Part C is deleted to avoid unnecessary cross referencing within the Plan. Deletion of 'Development will not be permitted...' in Original Part D (now part B) to ensure the policy is positively prepared. Replace green space with green infrastructure in Original Part E (now Part C) to ensure correct terminology is used in the policy. Part I (now F) and Part J (now G) amended to replace Green Space with Green Infrastructure to ensure correct terminology is used in the policy. 'And' added to the end of Part L (now part I) to make the policy more effective.
		Supporting Text: 7.0.1 ~~The term~~ 'Green Infrastructure' ~~refers to the network of blue and green spaces, parks and gardens, nature reserves, sports pitches and playing fields, allotments, cemeteries, trees and woodlands, green roofs and drainage systems,~~ comprises the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems, all of which provide a wide range of benefits and services. The type, condition and degree of connectivity of the natural capital features that form part of the borough's green infrastructure assets determines the extent and nature of the ecosystem services they provide in supporting human wellbeing and quality of life. Maximising the value and benefits derived from these assets, requires planning, design, and management.	Modification of definition of Green Infrastructure in supporting text (7.0.1) to be consistent with that contained in the glossary.
		7.0.2 All development should avoid putting pressure on vulnerable ecosystems and mitigate risk through careful planning of green infrastructure, in line with Paragraph 159 of the NPPF 2023. Proposals for new green infrastructure should take account of Natural England's Green Infrastructure Guidance.	Supporting text (7.0.2) amended to ensure proposals take account of national Green Infrastructure guidance produced by Natural England.

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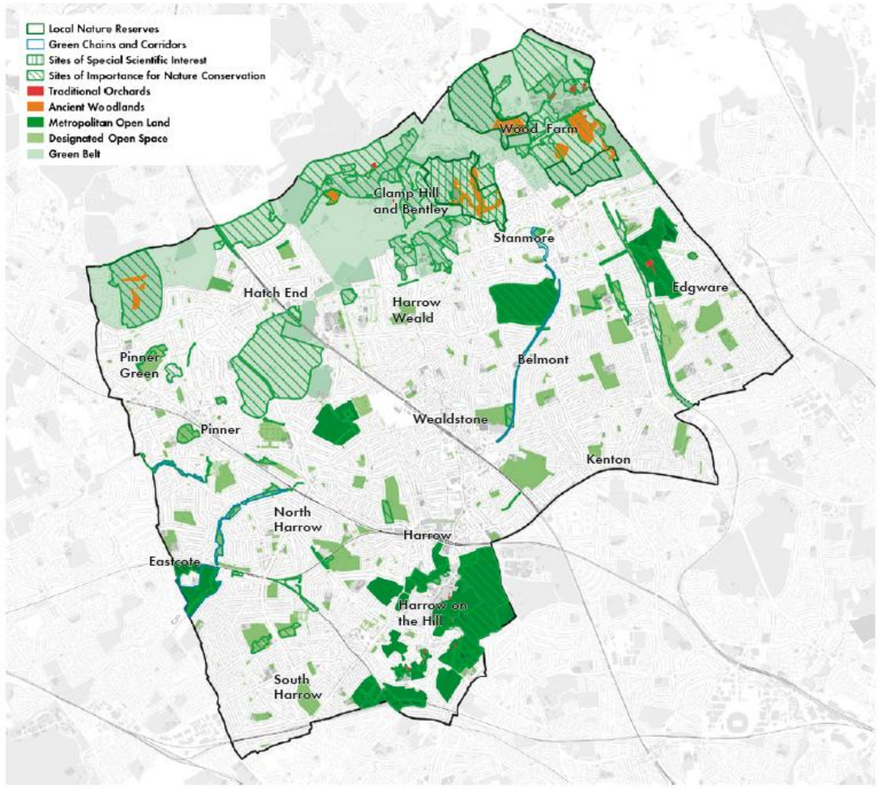
		7.0.3 Metropolitan Open Land and Green Belt spaces provide some of Harrow's largest green infrastructure assets. These are protected from inappropriate development through the London Plan and NPPF. Private gardens, green spaces, green corridors, and landscaped areas are also green infrastructure assets requiring protection, enhancement and reconnection, particularly in areas deficient in natural capital. 7.0.4 Green infrastructure and the natural capital it supports will play an increasingly pivotal role in keeping the borough liveable and providing equitable public goods from which everyone should benefit. Green infrastructure plays several important roles, including: (a) Cooling our cities and combatting the urban heat island effect, (b) Minimising flooding by providing enabling natural drainage, (c) Removing pollution from the air and creating oxygen, (d) Supporting and providing access to bring about higher levels of biodiversity. 7.0.5 Improvements in green infrastructure provision can facilitate mental and physical health and wellbeing, climate change mitigation and adaptation, water and air quality improvements, active travel (walking and cycling), ecological connectivity and resilience, wildlife conservation and habitat condition and local food growing, as well as traditional aspects such as play, sport and recreation. The design of green infrastructure should follow the statutory biodiversity matrix, ensuring that elements are resilient to climate change and well managed. 7.0.6 ~~Blue infrastructure is~~ Rivers, water spaces and flooding are discussed further in Chapter 08, however it is important to note that any development that contains ~~blue~~ such infrastructure assets should follow Environment Agency guidelines and any future guidance produced by the Council. ~~7.0.7 While this policy aims to protect and enhance Harrow's environment, there are ongoing examples of front and rear gardens being hard surfaced, and vegetation removal contributing to biodiversity loss and climate risks in the borough. The council will resist proposals that do not contribute to a clean and green borough or impact on ecosystem services.~~	Supporting text (7.0.6) amended to provide specific signposting on the aspects of Blue Infrastructure that are addressed in other policies. Supporting text deleted (7.0.7) as development of front and rear gardens is not related to the policy and is covered elsewhere in the plan.

Ref	Chapter /page/policy number	Modification	Reason for Modification
		~~**Green and Blue Infrastructure**~~  ~~**Source: Harrow Characterisation and Tall Buildings Study (2021)**~~	Map deleted as whilst included for illustrative purposes during the preparation of the plan, it does not provide an accurate representation of Green Infrastructure across the borough over the plan period and therefore its continuing inclusion is not effective nor justified.
MM43	Policy GI1 pp225-227	**Policy GI1: Green Belt and Metropolitan Open Land** A. Green Belt Land, is defined on the Policies Map: a. Any proposals for development in the Green Belt will be considered in accordance with the NPPF. ~~b. Development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt, and must respect the character of its surroundings.~~ B. Metropolitan Open Land (MOL) , is defined on the Policies Map: a. In accordance with the London Plan, Metropolitan Open Land is to be protected from inappropriate development ~~in accordance with national planning policy tests that apply to the Green Belt.~~ ~~C. Proposals for the beneficial use of land in the Green Belt and / or MOL will be supported where the use would not have an inappropriate impact on the openness and permanence of the Green Belt and MOL, having regard to:~~ a. ~~Visual amenity, function and openness character;~~ b. ~~Potential to enhance public access as part of the Green Grid; and~~ c. ~~Other beneficial uses as set out in the NPPF. Use of land for food growing or community gardening;~~ d. ~~The protection and enhancement of heritage assets;~~	Part A amended to link the policy to the spatial extent of the Green Belt as shown on the Policies Map, to make the policy more effective. Part A (b) deleted as it does not accord with the Framework. Part B amended to link the policy to the spatial extent of MoL as shown on the Policies Map, to make the policy more effective. Cross-reference to the NPPF deleted to ensure consistency with the London Plan. Part C is deleted as it is not necessary for effectiveness and the reference to in

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		e. ~~Biodiversity improvements;~~ f. ~~Natural capital improvements.~~ Redevelopment or Infilling of Sites ~~D.~~ Proposals for the redevelopment, infilling or partial infilling of previously developed sites in the Green Belt and MOL will ~~only~~ be supported where the proposal accords with the Framework. ~~would not have a greater impact on the openness and permanence of the Green Belt and MOL, and the purposes of including land within it, than the existing development is an appropriate use as defined in the NPPF (Green Belt) or London Plan (MOL) and, having regard to:~~ ~~a. The height of existing buildings on the site;~~ ~~b. Visual amenity and character of the site and surrounds;~~ ~~c. The proportion of the site that is already developed;~~ ~~d. The footprint, distribution and character of existing buildings on the site; and~~ ~~e. The relationship of the proposal to any retained development on the site.~~ E. Proposals on allocated sites GB1 and GB2 will be required to demonstrate very special circumstances and ~~Green Belt or MOL land that may not be in accordance with the NPPF~~ should be put forward in the context of a comprehensive, long term plan(s) for the site as a whole. ~~Inappropriate and Harmful Development in the Green Belt and Metropolitan Open Land~~ ~~F. Proposals for inappropriate development, or redevelopment which would harm the essential characteristics or purpose of the Green Belt or Metropolitan Open Land will be refused in the absence of clearly demonstrated very special circumstances.~~ **Supporting Text** 7.1.1 Harrow's Green Belt accounts for 21.6% of Harrow's land area, and benefits from a variety of uses that help to maintain its openness and character. As well as a number of farmland and woodland areas, uses of the Borough's Green Belt include sports grounds, public open space, nature reserves and burial space. The Green Belt's purpose is to prevent urban sprawl by keeping land permanently open. ~~provide a break between urban areas and rural areas.~~ This policy has been prepared to reflect the provisions of Green Belt policy contained in the NPPF (Dec 2023). 7.1.2 Metropolitan Open Land is strategic open land located in the urban area and is specific to London. MOL uses in the Borough include parks, outdoor sports pitches, golf courses and allotments. 7.1.3 Beneficial uses of Green Belt and Metropolitan Open Land help to sustain their openness and usefulness for the current and future generations. 7.1.4 The NPPF and London Plan strongly advocate for the protection of Green Belt and MOL land. The primary aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. 7.1.5 Inappropriate development is, by definition, harmful to the Green Belt and will not be approved except in very special circumstances. Very special circumstances arise when harm resulting from a proposal is clearly outweighed by other considerations.	accordance with the Framework at Part A of the policy is sufficient. Part D amended to ensure consistency with national policy and the London Plan. Part E amended to ensure consistency with national policy and the London Plan. Text amended to be specific to site allocations GB1 and GB2. Part F repeats the provisions of national policy and has been deleted to ensure a more effective policy. Wording amended to be consistent with the Framework. Addition to supporting text to ensure consistency with national policy applicable to the preparation of the Plan at the time of examination.

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		7.1.6 Harrow's MOL should be protected from inappropriate development in accordance with the same national planning policy tests that apply to the Green Belt. Proposals that enhance community access to MOL or provide additional appropriate benefits for the community will be encouraged. Examples include improved public access, inclusive design, sport and recreation facilities, habitat creation, landscaping improvement and flood mitigation. 7.1.7 A significant strategic site ~~redevelopment opportunity~~ exists at the Royal National Orthopaedic Hospital (RNOH), an existing Green Belt use. The Hospital is a nationally and internationally recognised facility located in the Green Belt at Brockley Hill, Stanmore. The hospital complex is spread over a substantial site area and occupies many outdated, substandard buildings. Redevelopment of the site offers the potential to provide a modern, fit for purpose accommodation that befits the hospital's status, and improves the openness of the site by rationalising the footprint of the buildings. ~~The desirability of providing new accommodation for the hospital is a significant consideration and may constitute very special circumstances for enabling development that would otherwise be inappropriate development in the Green Belt.~~ Redevelopment proposals should be in line with masterplans agreed by the Council to ensure compliance with green belt development requirements. Related or ancillary uses (i.e. research facilities) may also be appropriate on the site where these would benefit from co-location or represent enabling development. ~~7.1.8 Another strategic Green Belt redevelopment opportunity exists at Harrow College. The College is currently spread over two sites, with the principal campus located in Lowlands Road, Harrow Town Centre. Parts of the site are substantially open in character and should remain so; redevelopment will be confined within the boundary shown in the Policies Map. The original college building on the site is of some local architectural and historic merit and every effort should be made to retain it. However, the wider complex contains many later additions, the potential redevelopment of which could secure rationalisation of built form and enhance the site's contribution to Green Belt openness. Open land to the north of the existing complex of buildings could form an extension to Harrow Weald cemetery.~~	Text deleted as approach not in accordance with the Framework. Harrow College is not identified on the policies map. Paragraph deleted for clarity and effectiveness of the policy.
MM44	Policy GI2 up to para 7.2.8 pp228-229	**Policy GI2: Open Space** A. Development proposals on Designated Open Space (as shown on the Policies Map) must: a. Contribute to the provision, protection and enhancement of high quality, multi-functional, publicly accessible open space~~, particularly in areas of deficiency~~; b. Not result in the net-loss of open space; c. Improve access to green space where appropriate, including natural green space, particularly in areas where deficiencies in access have been identified; and d. Enhance biodiversity and improve access to biodiversity and natural capital. B. Major development proposals ~~must~~ should incorporate new publicly accessible open space in accordance with the standards set in the London Plan unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions will be required. C. Existing open space~~, sports pitches, recreational buildings, and playing fields~~ should not be built on unless: a. An assessment has been undertaken that clearly demonstrates the open space, buildings or land are surplus to requirements; or b. The loss resulting from the proposed development would be replaced by equivalent or better provision, in terms of quantity and quality in a suitable location; or ~~c. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use, or~~ ~~d~~. c. The proposal is for a small ancillary use (maintenance shed, food & beverage, changing rooms) that would enhance the useability of the space and surrounds.~~, or~~	Part A is amended to link the policy to the spatial extent of open space across the borough as shown the Policies Map, to make the policy more effective. The reference to areas of deficiency has been deleted as these areas are not identified in an up-to-date evidence base and this part of the policy is not justified. Part B amended to ensure the policy is positively prepared and consistent with the London Plan. Reference to sports pitches, recreational buildings and playing fields in part C deleted at the request of Sport England to ensure consistency with national planning guidance. All references to sport and recreation are now contained in CI3. Part C (c) deleted at the request of Sport England to ensure consistency with

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		~~e. The development is required for critical social infrastructure, the positive benefits of which clearly outweigh the loss of the current or former use.~~	national planning guidance. All references to sport and recreation are now contained in CI3. Part (e) is not necessary for the soundness of the policy and has been deleted.
		Supporting text: 7.2.1 Open Space is a vital component of London's open space network and, more locally, the West London Green Grid, which contributes significantly to the environmental quality and natural capital of the borough and surrounds. Access to a network of high-quality open spaces including wild and natural green spaces, and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. 7.2.2 Much of Harrow is relatively well served by parks and open spaces. However, since the pandemic there has been increased usage and damage to Harrow's open spaces. This is evidenced by Harrow's performance in the Good Parks London rankings, falling from 11th out of 32 London Boroughs in 2018, to 26th out of 29 London Boroughs in 2022[26].	
		~~7.2.3 Several areas within the borough have a deficiency in access to green space. The south and central areas of the borough have a deficiency in the quantity of open space provision. Much of the Borough is more than 400m from a public open space of at least 2ha. There are particular areas of deficiency in accessibility in the centre of the Borough including around the Belmont Local Centre, in the part of the Opportunity Area between Harrow and Wealdstone, between Pinner and Hatch End and around Rayners Lane. Work must be undertaken to improve the number and quality of open spaces in these areas in line with the Harrow Open Space PPG17 Study (2011), and the Harrow Sports Facilities Strategy (2023).~~	To reflect the amended policy wording
		~~7.2.4 Where development is proposed on existing open space, sports pitches, recreational buildings, and playing fields an assessment must be undertaken that demonstrates that the space is surplus to requirements. This assessment should consider the Council's Sports Facilities Strategy (2023), and Sport England Guidance. For the purpose of this policy, critical infrastructure is defined as being a physical facility, structure or asset essential to the social or economic functioning of the borough. This infrastructure should be identified in the Infrastructure Delivery Plan or agreed by the Council.~~	To reflect the amended policy wording
		7.2.5 Open space should be taken into account in planning for new development and considering proposals that may affect existing open space in the borough. Upgrades have been made to several key sites in recent years, although more work is required to secure a greater number of green spaces, adding to the Harrow Green Grid and improving the quality of the existing spaces in the borough. 7.2.6 Opportunities exist to improve the quality of open spaces including nature sites and the connections between them; protecting and adding to residents' opportunities for access to nature and the benefits this provides. Open spaces that are well-designed and well-managed for people and nature can provide a range of other ecosystem benefits. To realise these, development must support the provision, protection and enhancement of open spaces. Development must maintain and wherever possible enhance access to, and connections between the network of open spaces within and outside the Borough, prioritising measures that encourage walking and cycling.	
		~~7.2.7 Development proposals located adjacent to open space must respond positively to the character function of the open space as well as protect, and wherever possible enhance, the biodiversity value and visual amenity provided by the space.~~	Not justified by the evidence base

[26] https://parksforlondon.org.uk/wp-content/uploads/2022/12/Good-Parks-for-London-2018.pdf

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			Correct terminology added to paragraph 7.2.8 to improve the effectiveness of the policy.
MM45	Policy GI3 pp231-232 Policy and supporting text	**Policy GI3: Biodiversity** Protection of Biodiversity & Natural Capital A. Biodiversity and natural capital ~~must~~ should be protected, enhanced, extended and connected. Development proposals must contain a biodiversity plan including an appropriate biodiversity net gain metric, a Preliminary Ecological Assessment (where appropriate) and an on and offsite mitigation and management plan unless exempt under the Environment Act 2021. B. The Ecological Mitigation Hierarchy, to avoid impact, mitigate, and as a last resort compensate must be followed when considering habitats and protected and priority species. C. Development proposals ~~must~~ should not result in loss of, or pose direct or indirect negative impacts to: a. Irreplaceable habitats (e.g. ancient woodland) or features (e.g. ancient/veteran trees) b. Sites nationally or internationally designated for nature conservation or geodiversity c. Sites of Importance for Nature Conservation/ Regionally Important Geological Sites d. Core areas identified within the Local Nature Recovery Strategies (LNRSs) for London or Hertfordshire e. Other important sites, features or functions where losses or impacts could not be adequately mitigated or compensated for with regard to: i) LNRS areas; ii) Areas of priority habitat; iii) Important features (e.g. historic hedgerows); iv) Green or blue corridors or other functional linkages within the local ecological network; and v) Ecosystem function or resilience. D. All proposals must consider the presence of protected and priority species and submit up to date surveys where appropriate and include appropriate mitigation strategies for their continued protection~~, within the site if at all possible~~. E. Development proposals ~~that would increase~~ should seek to reduce deficiencies in access to nature ~~will be resisted~~. Biodiversity and nature recovery F. Development proposals should: a. Conserve, enhance, extend and connect Harrow's biodiversity; b. Utilise nature-based solutions to manage environmental pressures; c. Strengthen the Borough's natural capital; d. Improve access to nature where this does not impact important habitats and species G. All major and minor development proposals, unless exempt under the Environment Act 2021, must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain. Proposals will be required to demonstrate compliance with the criteria below and provide: a. A minimum of 2 biodiversity units per hectare; or b. A minimum net uplift in biodiversity unit value of 1~~5~~0%, whichever is greater; and c. A minimum of one ~~biodiversity~~ wildlife enhancement per residential dwelling; and d. Details surrounding the delivery, monitoring and maintenance of BNG units, whether wholly on-site, or utilising locally strategic off-setting location(s).	Deletion of 'must' in part A to ensure the policy is positively prepared Deletion of 'must' in part C to ensure the policy is positively prepared. Amendments to part D to improve effectiveness and clarity. Deletion of 'will be resisted' in part E to ensure the policy is positively prepared. Reference to the provisions of the Environment Act added to part G to ensure the policy reflects the provisions of statute so that the policy is effective. Terminology corrected in part G (c) to improve effectiveness of the policy.Net

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		Supporting Text: 7.3.4 To ensure that biodiversity degradation in Harrow is reversed, the council has set a biodiversity net gain target of a minimum 10~~5~~% increase in habitat value compared with the pre-development baseline. This will be calculated using an appropriate Biodiversity Net Gain Metric. Biodiversity net gain should be fully integrated into a design-led approach with consideration given to the site context and wider landscape setting. ~~This decision has been made after consideration of the challenges faced by wildlife within a densely packed urban setting and the additional requirements for connected corridors that this engenders.~~ 7.3.5 Viability testing has found that requiring a 10~~5~~% uplift in biodiversity unit value ~~has a minor impact on the viability of development in Harrow and~~ can ~~therefore~~ be viably absorbed by development.	uplift sought by the policy reduced from 15% to 10% as the 15% sought it not justified by the evidence base. Supporting text amended to be consistent with policy modification.

Chapter 8 – Responding to the Climate and Nature Emergency

Ref	Chapter /page/policy number	Modification	Reason for Modification
MM46	Policy SP08 Pp242-243	**Strategic Policy 08: Responding to the Climate and Nature Emergency** A. In compliance with the Council's Climate and Nature Strategy (2023-30), all development in Harrow must be undertaken in accordance with sustainable development practices, and positively manage natural capital for the benefit of current and future generations. Development must contribute to achieving the following objectives: **Clean Energy Used Efficiently** a. Make the fullest possible contribution to reducing greenhouse gas emissions in both the construction and operational phases of development by maximising energy efficiency and conservation measures, whilst prioritising the use of low carbon heating, renewable energy solutions and local renewable energy generation in line with Policy CN2 (Energy Infrastructure). b. Ensuring that all new housing is net zero carbon in line with Policy CN1 (Sustainable Design and Retrofitting). **Green Mobility** c. Prioritise active and low carbon transport options to include walking, cycling and public transport. d. Reduce fossil fuel vehicle journeys, supporting necessary ongoing private vehicular travel needs by facilitating and encouraging car-sharing and electric vehicle usage. **Waste-Free Economy** e. Minimise the embodied carbon and ecological footprint of new development by ensuring that materials are sustainably sourced, sustainable construction techniques are utilised, and waste is re-used and recycled as part of the circular economy. f. Through careful material selection and design, ensure developments are capable of being easily altered and adapted for future needs to ensure the fullest possible utilisation during their lifetime, and are otherwise capable of disassembly and full re-use or recycling of materials at end of life. g. Design developments to enable occupiers to apply the waste hierarchy during day-to-day use, and to support the growth of the circular economy by increasing re-use and recycling of materials whilst minimising residual waste. **Healthy Places for us and Nature** h. Contribute to building a healthier, more resilient and thriving local natural environment that is valued by the people of Harrow. This will include: 1. Making space for Nature and increasing levels of biodiversity, the integrity of ecosystems and the borough's stock of natural capital; 2. Where possible avoiding or otherwise minimising light and noise pollution, and improving air, water and soil quality through the adoption of appropriate best practice pollution prevention guidelines; 3. Protecting people and places from climate impacts and risks through locally distinctive, high quality and sustainable design and multi-functional green infrastructure that increases local resilience, including to drought, overheating, storm and flooding events; 4. Improving residents' health and wellbeing by affording greater opportunities for direct connection with the natural world locally; and 5. Protecting and enhancing carbon storage in the local natural environment. <u>Groundwater and land quality</u>	

<table>
<tr><th>Ref</th><th>Chapter /page/policy number</th><th>Modification</th><th>Reason for Modification</th></tr>
<tr><td></td><td></td><td>i. Planning policies and decisions should ensure that:
1. a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
2. after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
3. adequate site investigation information, prepared by a competent person, is available to inform these assessments.</td><td>Addition of section on Groundwater and land quality to ensure development proposals take account of ground conditions. Additional provision will ensure consistency with national policy.</td></tr>
<tr><td><u>MM47</u></td><td>Policy CN1
Pp245-246</td><td>Policy CN1: Sustainable Design and Retrofitting

New Buildings
A. All new buildings should be designed and built to be Net Zero Carbon in operation. They should be ultra-low energy buildings, utilise low carbon heat with no gas connection, contribute to the generation of renewable energy on-site, and be constructed with low levels of embodied carbon.
B. All new buildings ~~must~~ should minimise the use of mains water, achieving a maximum consumption of 105 litres per head per day, excluding allowance of up to five litres for external water consumption.
C. All new buildings should meet the following standards:
Space Heating Demand
a. All dwellings should achieve a space heating demand of less than 15 kWh/m2 GIA/yr; and
b. All non-domestic buildings should achieve a space heating demand of less than 15 kWh/m2 GIA/yr;
Energy Use Intensity (EUI)
c. Domestic buildings - All dwellings should achieve an Energy Use Intensity (EUI) of no more than 35 kWh/m2GIA/yr;
d. Non-domestic buildings - Non-domestic buildings should achieve an Energy Use Intensity (EUI) of no more than the following, (where technically feasible) by building type or nearest equivalent:
<table>
<tr><th>Building Typology</th><th>EUI Standard</th></tr>
<tr><td>Student or keyworker accommodation, care homes, extra care homes</td><td>35 kWh/m2 GIA/yr</td></tr>
<tr><td>Warehouses and light industrial units</td><td>35 kWh/m2 GIA/yr</td></tr>
<tr><td>Schools</td><td>65 kWh/m2 GIA/yr</td></tr>
<tr><td>Offices, Retail, ~~HE Teaching~~ Higher education teaching facilities, GP surgeries</td><td>70 kWh/m2 GIA/yr</td></tr>
<tr><td>Hotels</td><td>160 kWh/m2 GIA/yr</td></tr>
</table>

Offsetting (as last resort)
e. Offsetting will only be accepted as a means ~~to~~ of achieving planning policy compliance as a last resort if the building is compliant with all other Net Zero Carbon building aspects. In these circumstances, the applicant should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use</td><td>Deletion of ‘must’ in part B to ensure the policy is positively prepared.

Amendment for clarity.

Amendment for clarity.</td></tr>
</table>

Ref	Chapter /page/policy number	Modification	Reason for Modification
		Intensity in kWh. The applicant should pay into the Council's offset fund a sum of money equivalent to the shortfall; this contribution will be secured by way of a planning obligation. **Retrofit of Existing Buildings** D. The use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings, as well as the quality of living for their occupants. Retrofitting measures should consider how the building has been constructed, its context, and energy use. E. Development proposals for major residential domestic refurbishment ~~must~~ should achieve a certified 'Excellent' rating under the BREEAM Domestic Refurbishment 2014 scheme[27]. or future equivalent, unless it can be demonstrated that it is not feasible. F. Development proposals for major non-residential refurbishment, including mixed-use development, ~~will be required to~~ should achieve a certified 'Excellent' rating under the BREEAM Non-Domestic Refurbishment scheme, or future equivalent, unless it can be demonstrated that it is not feasible. G. Development proposals for the refurbishment or retrofit of all buildings should achieve a certified 'Excellent' rating for 'Wat01' or future equivalent, unless it can be demonstrated that it is not feasible. H. Proposals for retrofit of existing buildings ~~must~~ should consider impacts on the historic environment, and the amenity of the building's users and neighbours. Historic England guidelines should be considered when retrofitting older buildings.	Deletion of 'must' in part E to ensure the policy is positively prepared. Deletion of 'will be required to' in part F to ensure a more flexible and positively prepared policy. Deletion of 'must' in part H to ensure the policy is positively prepared. Addition of 'the' to improve effectiveness.
MM48	Policy CN2 Up to para 8.2.6 Pp251-252	**Policy CN2: Energy Infrastructure** A. Development proposals ~~must~~ should be designed in response to a site-specific assessment of the most effective and efficient energy supply options that are capable of delivering net zero operational carbon, taking into account any local energy master plans where applicable. ~~B. Major development proposals must adhere to London Plan requirements with regard to communal low-temperature heating systems, heating hierarchy and future connections to heat networks (London Plan Policy SI3 Energy Infrastructure, parts D and E).~~ B. ~~C.~~ Major ~~development must,~~ and minor development should~~,~~ maximise onsite renewable energy generation through the provision of rooftop solar photovoltaic (PV) panels, or other suitable renewable energy generation methods. ~~D. Where car parking is proposed in a development, electric vehicle charging infrastructure must be provided in line with the Harrow Electric Vehicle Strategy, and Policy M3 (Parking).~~ C~~E~~.The council will support standalone renewable energy infrastructure where it meets all other relevant aspects of this Local Plan. **Supporting text:** 8.2.1 London currently sources 95% of its energy from outside the GLA boundary. In order to meet the GLA, and Harrow's zero-carbon targets, significant changes are required to the way electricity is generated and used. The West London electricity grid is under pressure from development, a growing population and a high concentration of data centres. There is growing	Deletion of 'must' in part A to ensure the policy is positively prepared. Reference to the London Plan is not required for an effective policy. Part B deleted. Deletion of 'development must' in part C (now part B) to ensure the policy is positively prepared. The plan has been prepared to be read as a whole. Cross reference to policy M3 is not necessary for policy CN2 to be effective. Part D therefore deleted.

[27] (https://tools.breeam.com/filelibrary/BREEAM%20Refurb/KN4613_-_BREEAM_Domestic_Refurbishment.pdf)

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		pressure to adopt and deliver on net-zero targets in line with the Mayor of London's Accelerated Green Pathway, which aims for rapid and mass electrification of heating and transport across London. 8.2.2 The identification of suitable areas for renewable and low carbon energy sources is supported by this Local Plan and the Council's Climate and Nature Strategy ('Living Harrow'). The Council will support appropriate community-led initiatives for renewable and low carbon energy, and plan for ongoing reinforcement of the power grid with localised renewable and low carbon energy, in line with Paragraph 160 and 161 of the NPPF (2023) 8.2.3 Development must deliver electricity through local, clean and low-carbon sources, shifting away from fossil fuels and utilising a diverse range of heat sources and localised electricity generation options. This will ensure that Harrow becomes more self sufficient and resilient with regard to its energy generation, distribution and usage. 8.2.4 To achieve this, major development proposals must engage at an early stage with relevant energy suppliers and bodies to establish future energy and infrastructure requirements to support the development. Minor development proposals must investigate the feasibility of incorporating on-site energy generation and low carbon heating options such as heat networks and heat pumps. 8.2.5 Developers of sites crossed or in close proximity to National Grid Electricity Transmission (NGET) assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance. NGET's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. 8.2.6 The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. NGET's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets',	Addition of supporting text to reflect representations received from the National Grid. Addition will ensure a more effective and justified policy.
MM49	Policy CN3 up to para 8.3.10 Pp254-256	**Policy CN3: Reducing Flood Risk** A. Proposals will be required to apply the sequential and exceptions test (where necessary) in line with National Policy. B. Proposals that require a Flood Risk Assessment (FRA), in line with National Policy must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a FRA ~~must~~ should: a. Minimise the risk of flooding on site and not increase the risk of flooding elsewhere; b. Wherever possible, reduce flood risk overall; c. Ensure a dry means of escape for occupiers of the development; ~~and~~ d. Achieve appropriate finished floor levels which, for residential development in flood zone 3 (subject to sequential and exceptions tests), must be at least 300mm above the modelled 1 in 100 year plus climate change flood level; e. No increase in the built footprint of any existing development within Flood Zone 3b; f . No increase in vulnerability classification of any existing development within Flood Zone 3b; and ~~e.~~ g. flood resilience measures must be fitted to 0.5m above finished floor level. C. Proposals ~~that would fail to~~ should make appropriate provision for flood risk reduction and mitigation~~, or which would~~ and not increase the risk or consequences of flooding~~, will be refused~~.	Deletion of 'must' from part B to ensure the policy is positively worded. Addition of parts B (e and f) to ensure the policy is explicitly in accordance with national flood risk policy and reflects national planning guidance. Amendments to part C to ensure the policy is positively prepared.

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		D. Sites that are mapped as falling within 'Developed' Flood Zone 3b will be treated as having a high probability of flood risk, for the purposes of applying the sequential and (where necessary) exception tests. ~~, provided~~ Provided that the development would be safe and would not increase the risk or severity of flooding elsewhere, opportunities will be sought from the redevelopment of sites in 'Developed' Flood Zone 3b to restore the natural function and storage capacity of the floodplain. E. Sites that are mapped within 'Greenfield' Flood Zone 3b will be treated as functional floodplain for the purposes of applying the sequential and exception (where necessary) tests. Proposals that involve the loss of undeveloped floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be refused. F. Basement development will not be allowed on sites within Flood Zone 3b. Outside of these areas, development that involves the formation of new basements, or the change of use of existing basements, must have regard to flood risk and ensure that it is specifically addressed through the Flood Risk Assessment. The installation of resilience measures to basements will be required. Proposals for the formation of new dwellings or additional habitable accommodation within basements will be refused. G. Natural flood management methods should be employed as the preferred approach in development proposals. **Supporting Text:** 8.3.1 The National Planning Policy Framework demonstrates the Government's commitment to pro-active management of development in relation to flood risk, and to planning for climate change impacts. It also tasks the planning system with preventing new and existing development from contributing to, or being put at unacceptable risk from, environmental water pollution and the remediation of historic pollution where appropriate. 8.3.2 The London boroughs are Lead Local Flood Authorities (LLFAs) and are responsible for local surface water flood risk management and for maintaining a flood risk management assets register. LLFAs are required to produce Flood Risk Management Strategies. 8.3.3 The policies in this chapter respond to the Borough's evidence base, in particular Harrow's Strategic Flood Risk Assessment, Local Flood Risk Management Plan and Strategy, and Surface Water Management Plan. A Hydrological Catchment Strategy is proposed to replace the Surface Water Management Plan 2012 and the Local Flood Risk Management Strategy 2016. This would replace the mapped critical drainage areas with hydrological catchment areas. 8.3.4 Local Authorities are required to meet flood risk mitigation requirements whilst facilitating development needs. Where criterion B (d) of the policy applies, applicants and architects are required to ensure accessibility issues relating to elevated finished floor levels are adequately addressed through a design led approach. Applicants should consult the most recent flood mapping to determine whether a site is at risk of flooding (https://flood-map-for-planning.service.gov.uk/). Applicants and planners should consult the Environment Agency's website for guidance regarding preparing for flood risk management. 8.3.5 The NPPF and accompanying PPG state that a sequential, risk-based approach to the location of development should be applied, with the aim of avoiding possible flood risk to people and property and taking the impacts of climate change into account. This is reinforced by London Plan Policy SI12. 8.3.6 The West London Strategic Flood Risk Assessment (SFRA)[28] has identified in broad terms areas that are liable to flooding from rivers and ordinary watercourses within the catchments of the Rivers Brent, Colne and Crane, and the associated probability of flooding. It also identifies areas subject to surface water flooding. The strategic assessment informs spatial planning in the Borough and form a principal component of the evidence base that underpins planning policies and site	Part D split into two sentences to improve clarity and effectiveness. Addition of 'as a preferred approach' in part G to improve the flexibility of the policy

[28] https://westlondonsfra.london

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		allocations. Applicants should consider the findings of the SFRA when undertaking a site specific SFRA (where necessary) and ensure the requirements of the sequential and exception test are met. 8.3.7 In urban areas surface water is an additional source of flood risk. Rainwater falling onto impermeable surfaces such as buildings and hard surfaces has traditionally been disposed of via Harrow's surface water drainage network. Incremental urbanisation of the Borough and finite drainage network capacity has increased surface water flooding in recent years. Harrow's Surface Water Management Plan (2012) identifies 15 critical drainage areas which extend over most of the borough and are susceptible to flooding from surface water and other sources. 8.3.8 Harrow's Local Flood Risk Management Strategy (2016) outlines the priorities for local flood risk management, assesses risk, provides a delivery Action Plan, and identifies roles and responsibilities of authorities. The London Surface Water Strategy seeks to increase London's resilience to surface water flooding. The Strategy will facilitate collaboration across administrative boundaries and with multiple strategic partners, including securing funding for surface water management projects and maintenance more efficiently. 8.3.9 The Harrow Infrastructure Delivery Plan has identified existing and planned flood alleviation schemes. These schemes aim to mitigate both identified and predicted flood risks, while considering the cumulative impact of development. 8.3.10 Harrow will proactively work with the West London LPA and Strategic Flood Group and other partnerships to adopt a catchment based approach to flood alleviation, mitigating water pollution and improving water quality across the network of waterways and to the collection and use of developer contributions to fund mitigation measures.	Reference to the London Surface Water Strategy at paragraph 8.3.8 to improve the effectiveness of the policy. Addition to paragraph 8.3.10 to clarify the scope of joint working with the West London LPA and Strategic Flood Group.
MM50	Policy CN4 pp257-259	**Policy CN4: Sustainable Drainage** A. All development is required to reduce the risk of surface water flooding, through separation of foul and surface water flows. B. Development ~~must~~ should incorporate Sustainable Urban Drainage Systems (SuDS) where necessary to control discharge rates to reduce surface and storm water run-off. Rainwater should be utilised as a resource where feasible through rainwater harvesting and blue roofs. Greenfield run off rates must be achieved. C. The drainage hierarchy identified in London Plan Policy SI13 (Sustainable Drainage) should be applied to all development. D. The design and layout of major development proposals will be required to: a. Maximise the use of Sustainable Urban Drainage Systems to control the rate and volume of surface water run-off, and follow the London Plan Drainage Hierarchy (Policy SI13); b. Ensure separation of surface and foul water systems; c. Make reasonable provision for the safe storage and passage of flood water in excessive events; and d. Ensure adequate arrangements are in place to secure the long-term responsibility for the management and maintenance of on-site infrastructure; E. Proposals for minor developments, householder development, and conversions should make use of sustainable drainage measures wherever feasible and must ensure separation of surface and foul water systems. F. There is a presumption against impermeable hard standing on residential gardens and public open space. No impermeable hard standing will be permitted if it fails to control and reduce surface water runoff. G. Proposals ~~that would fail to~~ should make adequate provision for the control and reduction of surface water runoff ~~will be refused~~. H. Proposals for ~~major~~ all development should ensure appropriate best practice is followed with respect to the control of water pollution to ensure groundwater resources are not negatively impacted. Where SuDS are proposed, these must prevent discharges to ground through land affected by contamination.	Deletion of must in part B to ensure the policy is positively prepared. Part G amended to ensure the policy is positively prepared. Amendments to part H to protect groundwater resources in accordance with national planning guidance.

Ref	Chapter /page/policy number	Modification	Reason for Modification
		Supporting Text: 8.4.1 Ongoing population growth and development has increased pressure on drainage infrastructure. To alleviate this pressure, development needs to utilise sustainable drainage methods. Increased development and hard surfacing has resulted in additional incidents of overland flows and flooding due to insufficient natural drainage. 8.4.2 Harrow, in partnership with the North-West London Strategic Flood Group will work with providers to identify and undertake work to design and install strategic flood storage and attenuation drainage solutions. 8.4.3 Drainage should be designed and implemented in a partnership manner that promotes multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation. The London Sustainable Drainage Action Plan addresses and promotes the awareness and retrofitting, of sustainable drainage systems across London, and should be followed as an example of good practice. 8.4.4 Approaches to surface water management that consider flooding, pollution, biodiversity and amenity are referred to as Sustainable Drainage Systems (SuDS). SuDS systems are generally considered the best practice approach to surface water management as they provide flow on effects and replicate natural water catchments and storage systems. SuDS measures aim to manage surface water runoff as close to the source as possible. A strong preference is given to green over grey drainage features. Developments should follow the sustainable drainage hierarchy identified in London Plan Policy SI13 (Sustainable Drainage). 8.4.5 The London Sustainable Drainage Proforma sets the standard for information required in a Sustainable Drainage Strategy and must be utilised by applicants to avoid delays in the planning process. 8.4.6 Thames Water has raised concerns around drainage and sewer network capacity across several proposed development sites identified in their Drainage and Wastewater Management Plan (Drainage and Wastewater Management Plan | Thames Water). For major applications, a Surface Water Drainage Strategy will need to be produced by developers in liaison with Thames Water Development Services. This is to include a detailed model of the network capacity to determine if mitigation is required. It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding. The Drainage Strategy is required to ensure any appropriate mitigation, including network upgrades, are undertaken ahead of occupation of the development, and should detail: (a) Pre and post development runoff rates and water quality impacts, ensuring run-off is clean and safe; and (b) Ownership, management and maintenance plan arrangements of any Sustainable Urban Drainage System features. 8.4.7 Surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha), in line with CIRIA guidance. 8.4.8 All development must separate foul and surface water flows where relevant and proportionate, having regard to the extent of changes to drainage/sewerage arrangements and the level increase in demand placed on the drainage/sewerage network as a result of the development. The Council's pre-application service should be used to determine the specific requirements for a proposal. It should be noted that in all cases development will also need to comply with the separate requirements of the Building Regulations (Approved Document H: 2015) in relation to the treatment of foul and surface water. 8.4.9 Where greenfield runoff rates cannot be achieved this should be clearly justified by the applicant. The fact that a site is previously developed and has an existing high run-off rate will not constitute justification.	

Ref	Chapter /page/policy number	Modification	Reason for Modification
		8.4.10 New hardstanding should be made from permeable materials. Development proposals will be expected to utilise permeable surfacing and include an ownership, management and maintenance plan as part of any planning application. The collection of water through tanks is encouraged as it creates resilience to drought and flooding. 8.4.11 Development must protect groundwater from contamination by following guidance from the Environment Agency. In some instances, developers may be required to submit a preliminary risk assessment at application stage where there is any potential land contamination. 8.4.12 Major developments must follow appropriate best practice pollution prevention guidelines; these include adherence with the following Construction Industry Research and Information Association (CIRIA) guidance documents to manage construction run-off: CIRIA C532 (2001) - Control of water pollution from construction sites. Guidance for consultants and contractors; CIRIA C648 (2006) – Control of Water Pollution from Linear Construction Projects; and CIRIA C741 (2015) – Environmental Good Practice on site. 4th Edition. Additionally, the incorporation and management of interceptors (e.g. SuDS) into development schemes to trap the silt, oil and other possible contaminants in run-off to prevent pollution and degradation of the downstream habitats should be designed in accordance with current best practice, including adherence to CIRIA C753 (2015), the SuDS Manual, ~~and~~ the Design Manual for Roads and Bridges (DMRB) Volume 11 Section 3 Part 10 HD 45/09 Road Drainage and the Water Environment, the Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9-G13, the Susdrain website, and Sustainable Drainage Systems: Non-statutory Technical Standards guidance and the recommendations to update these.	Addition of reference to the Environment Agency's approach to Groundwater Protection at paragraph 8.4.2 to ensure a more effective policy.

Chapter 9 – Managing Waste and Supporting the Circular Economy

Ref	Chapter / page / policy	Modification	Reason for Modification
MM51	CE1 parts A & B p266	**Policy CE1: Reducing and Managing Waste** A. All proposals (excluding Householder applications) will be required to make on-site provision for general waste, the separation of recyclable materials and the collection of organic material for composting. On-site provision ~~must~~ should: a. Ensure there is adequate space for temporary storage of waste generated by that site allowing for the separate storage of recyclable materials pending collection; b. Utilise bins that are compliant with the council's specifications for weight, durability and size, and compliant with British Standards Institution (BSI); c. Ensure safe access for collectors and, where relevant, collection vehicles; and d. Be located and screened to mitigate amenity impacts (odour, vermin, noise) to occupiers and adverse visual impact. ~~B. All proposals for major development should promote circular economy outcomes and aim to be net zero-waste. Applications should include a circular economy statement in accordance with London Plan policy SI 7.~~	Part (A) amended to make the Plan more positively worded. Part (B) deleted to avoid repetition of London Plan.
MM52	CE2 p269	~~**Policy CE2: Design to Support the Circular Economy**~~ ~~*Linkages:*~~ ~~*NPPF Chapter*~~ ~~*London Plan London Plan Policy SI7 Managing wate and supporting the circular economy*~~ ~~*London Plan Policy SI8 Waste capacity and net-waste self sufficiency*~~ ~~Policy CE2: Design to Support the Circular Economy~~ ~~A. Development proposals should apply circular economy principles in order to conserve resources and improve resource efficiency, with reference to London Plan policy SI7 (Reducing waste and supporting the circular economy).~~ ~~B. Major development proposals should aim to be net zero-waste. Any development proposals referred to the Mayor of London are required to submit a Circular Economy Statement in compliance with London Plan policy SI7.~~ ~~C. Consideration of Circular Economy principles should be given to the construction and operation of all types of development. Demonstration of circular economy considerations will be looked upon favourably in planning applications.~~ ~~Supporting Text:~~ ~~9.2.1 A circular economy is achieved by keeping materials in use for as long as possible, delivering the highest value, for as long as they can. The circular economy is the opposite of a linear economy where things are made, used and then thrown away. To achieve the circular economy and minimise embodied carbon in buildings we need to look for new ways to manufacture, select, use and reuse materials, particularly reusing materials on site from old buildings and incorporating them in new buildings.~~ ~~9.2.2 All development should aim to minimise waste and maximise recycling of materials in new developments.~~	Policy deleted to avoid repetition of London Plan.

Chapter 10 – Transport and Movement

Ref	Chapter / page / policy	Modification	Reason for Modification
MM53	Policy SP10 up to 10.0.5 pp271-274	**Strategic Policy 10: Movement** Travel in Harrow will be designed and integrated around communities to support everyday journeys and drive long-term sustainable growth, minimising private vehicle travel where possible. To achieve this, the London Borough of Harrow is committed to creating more pleasant neighbourhoods and town centres with better air quality, safer streets, improved accessibility and sustainable travel opportunities for all. Public and active transport travel networks will be enhanced to become attractive alternatives to private vehicles. Those travelling through the borough will be encouraged to shift towards these healthier and greener choices. This will support the borough's mission to decarbonise transport, ensure infrastructure is resilient to climate change, and secure Harrow's long-term status as an attractive location for residents, workers and visitors. To achieve the above vision: A. Development proposals ~~must~~ should facilitate improvements to transport infrastructure, ~~through~~ including active travel, and ~~the~~ public transport network improvements, to deliver safe, accessible, ~~inclusive,~~ healthy, walkable and ~~sustainable~~ inclusive neighbourhoods ~~and mitigate their transport impacts through planning obligations~~. B. Development ~~must make effective use of land,~~ should contribute to improving ~~it's~~ the connectivity and access~~ibility~~ to local services, including existing and future public transport infrastructure. ~~walking and cycling routes, complying with London Plan parking standards to reduce the land take needed for carparking and mitigating any adverse impacts on London's transport networks and supporting infrastructure~~. C. Development should minimise its transport impacts by complying with London Plan parking standards, including where appropriate car-free development in areas with good access to public transport, to reduce car parking and mitigating any adverse impacts resulting from new trips generated. ~~C. The Council will seek to improve access to public transport, including the provision of fully accessible step-free station links, particularly in areas of deprivation and for people with a disability, by working with Transport for London (TfL) to promote and improve public transport infrastructure, capacity where needed to support development and all abilities access.~~ D. The Council will apply the Healthy Streets Approach to transport outlined in the Mayor of London's Transport Strategy (2018), and any subsequent Transport Strategy. E. The Council will ~~seek to encourage and enable~~ deliver development that supports people to choose active transport for day and night-time travel by improving walking and cycling infrastructure across the borough. ~~Improvements to road safety will be made to facilitate this in line with the Mayor's Vision Zero objective.~~ F. The Council will seek to reduce vehicular emissions through supporting car clubs, and encouraging efficient, low-emission freight and delivery trips. G. The Council will actively support and facilitate the transition to Electric Vehicles (EV) by planning for the provision of charging infrastructure in new developments and the public realm. H. Improvements to road safety will be supported, in line with the Mayor's Vision Zero objective.	Part A is amended to improve clarity and reduce repetition with other policies and ensure the policy is positively prepared. Part B is amended to improve clarity, and reduce repetition with the London Plan, to make the Policy effective. New Part C is created from Part B to specifically address parking and ensure conformity with the London Plan. Deletion of original Part C to reduce repetition and improve clarity and effectiveness. Reference to Mayor's Vision Zero objective removed from part E and added as a separate policy provision at new part H to make the policy more effective.

Supporting Text:

10.0.1 A decarbonised, integrated, safe and accessible transport system is a vital requirement of the inclusive and healthy borough that the Council is working to create. Transport connects people to jobs, goods to businesses, and provides opportunities for education and leisure so that everyone benefits from sustainable economic growth.

10.0.2 The NPPF requires transport issues to be considered at the earliest stages of plan making and development proposals to address the potential impacts of development on transport networks, and realise opportunities presented by transport infrastructure, active travel, public transport, and climate change mitigation. Careful consideration needs to be given to the design of schemes so that they contribute to the making of high-quality places. Active travel refers to modes of travel that involve a level of physical activity. The term is often used interchangeably with walking and cycling, but active travel can also include trips made by wheelchair, mobility scooters, adapted cycles, e-cycles, scooters, as well as cycle sharing schemes.

Additional wording added to reflect the definition within the London Plan.

10.0.3 As identified in the Mayor of London's Transport Strategy, the only realistic way to address some of the transport challenges problems is to reduce dependency on cars in favour of active, efficient and sustainable modes of travel. The Mayor's Strategy has set a target for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041. The Council will work with TfL to identify additional targets for future iterations of the Mayor's Transport Strategy. The Healthy Streets Approach identified in the Strategy is also central to the development of healthy and sustainable streets across Harrow.

Healthy Streets Indicators

Source: Lucy Saunders

10.0.4 The LB Harrow Healthy Streets Data Pack (2024) produced by TfL outlines progress to date against the Mayor's Transport Strategy targets. This data shows that Harrow is generally on track to meet 2041 commitments. The Council intends to make strategic transport improvements in line with the datasets and mapping outlined in the Road Safety Priorities (2023), Strategic Cycling Analysis (2022), Bus Network Clarifications (2019), Bus Underperformance (2023), Strategic Walking Analysis (2023), and Strategic Neighbourhood Analysis (2023).

Wording amended to reflect the latest versions of relevant documents.

10.0.5 The ~~draft~~ Harrow Long Term Transport Strategy (LTTS) provides the policy framework for the planning and delivery of improved transport infrastructure and services in Harrow. The LTTS ~~Strategy~~ aims to address current barriers that affect the movement of people and goods and respond to the declared climate emergency. It contains four ambitions (healthy lives and safer streets, vibrant communities for all, greener travel options, and keeping Harrow moving and growing) and a series of priorities, actions and measures to achieve these. Regard should be given to the ~~Long Term Transport Strategy (~~LTTS~~)~~ when considering the potential for development and infrastructure within the borough including the potential to fund projects using S106 planning obligations, and the Community Infrastructure Levy ~~to contribute to the outcomes sought in both this Local~~

Wording amended to clarify the relationship between planning obligations and CIL.

Ref	Chapter / page / policy	Modification	Reason for Modification
		~~Plan and the LTTS~~. The Council will seek to set out spatially, through the Infrastructure Delivery Plan, transport improvements across the borough. This will include improvements to walking, cycling and public transport infrastructure.	
MM54	Policy M1 pp276-279	**Policy M1: Sustainable Transport** A. Development ~~must~~ will support improvement to active travel infrastructure by: a. Contributing~~e~~ to the delivery of ~~sustainable~~ inclusive neighbourhoods through the enhancement of cycle and pedestrian connections, including the delivery of strategic and local cycle networks within and through the borough ~~and other forms of sustainable travel,~~ to ~~local destinations, town~~ connect the borough's network of centres, transport hubs, schools, and other amenities including leisure, infrastructure, and employment assets; b. prioritising pedestrian access to and from the site. This should have regard to how occupants of the site will have access to local services and public transport. ~~b. Design new development in accordance with the London Plan's Healthy Streets approach, prioritising safe and convenient access routes for pedestrians, cyclists and those with disabilities;~~ c. Protecting and enhancing~~e~~ any existing publicly accessible cycle and pedestrian routes that cross development sites and maximising~~e~~ opportunities to improve public accessibility by providing new connections through sites; ~~d. Support the delivery of strategic or local cycle networks in and through the borough;~~ ~~e. Provide accessible, secure, and convenient cycle parking for all users, located in prominent locations, which meet or exceed London Plan requirements and London Cycle Design Standards. Facilities should include provision for charging of electric bikes.~~ ~~f. Deliver accessible cycle parking for people using cargo bikes or adapted cycles, and for people who may not be able to lift bikes;~~ ~~g.~~ d. Where necessary, ~~Provide~~ providing a development contribution towards publicly accessible cycle parking and dockless cycle and scooter hire schemes ~~where required~~; ~~h.~~ e. For Major non-residential developments, ~~Provide~~ providing well-designed, accessible cycle facilities including prominent, accessible and well-located showers, changing rooms and lockers, having regard to Policy GR2(B). B. Major development proposals ~~must~~ should demonstrate through the submission of a Travel Plan and Transport Assessment, (or a Transport Statement for Minor development proposals) that ~~negative~~ impacts on the transport network have been considered, identified, assessed and mitigated, and are supporting modal shift away from private vehicles. Travel Plans will be secured by way of a condition on the permission or a S106 planning obligation. C. The Council will seek to improve public transport accessibility by supporting: a. improvements to public transport assets which deliver improved overall frequency, capacity, quality, and enjoyment of public transport services; b. Improvements to public transport corridors, in particular bus routes, to provide improved bus infrastructure, both on-route as well as other infrastructure supporting bus operations; and c. Access improvements including the provision of fully accessible step-free station links, particularly in areas of deprivation and for people with a disability.	Part A amended to be more positively worded, and reflect the full scope of sustainable travel modes. Aa amended for clarity to make the Plan more effective. Part Ab replaced to reduce repetition with SP10, and improve effectiveness. Part Ac grammatical change to improve effectiveness. Parts Ad-f deleted to remove duplication of other parts of this policy, other policies in the Plan, and the London Plan. Part Ag (now Ad) grammatical modification to improve effectiveness. Part Ah (now Ae) wording modified for clarity to make the policy effective. Part B wording modified to make the policy effective. Part C added to cover public transport in order to cover all sustainable modes, to make the Plan effective.

Supporting Text:

10.1.1 The London Plan aims to enable a significant increase in active travel with walking and cycling becoming the primary, default choice because it has been made easier and safer. Active travel requires journeys to be made through physically active modes such as walking, cycling, skateboarding, scooters, etc.

10.1.2 Walking and cycling are environmentally friendly, healthy, cheap and reliable forms of transport that provide a realistic alternative to the car for many short trips. Active travel choices are one of the easiest ways to integrate regular exercise into a daily routine, enhancing physical and mental health incidentally. All development must aim to facilitate active travel choices, as good planning can make it easy for people to build activity into their daily lives.

10.1.3 Development can enable active travel through contributing to convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns. Much of this can be facilitated through the masterplanning process of town centres and transport corridors, in which the development of specific sites will contribute via planning obligations, or on-site provision.

10.1.4 The Council has committed to several strategic active travel projects and is continually planning further upgrades to the active travel network, often in partnership with Transport for London. Current projects include:

a. The Harrow to Pinner cycleway and public realm improvement project
b. Expansion of the School Streets programme to approximately 18 areas across the borough
c. The Highway Infrastructure Asset Management Plan (HIAMP)– Footway & Carriageway Resurfacing Programmes
d. Harrow on the Hill Station Cycle Hub
e. Pedestrian improvements to the Harrow View/ Headstone Drive/ Headstone Gardens junction, also known as the 'Goodwill to All junction'.

10.1.5 At present, car travel is still the dominant mode of transport in Harrow, with a particularly low cycling mode share. The borough has somewhat poor public transport accessibility and low levels of step free access at rail and tube stations. Many opportunities exist to realise the potential Harrow has to create a robust, green and inclusive transport system. These opportunities are planned for in Harrow's Long Term Transport Strategy ~~Study (2023)~~, which should be read in conjunction with the Mayor of London's Transport Strategy (2018). These documents should be used to inform future development proposals and decision making around transport in the borough.

~~**Healthy Streets Indicators**~~

Minimising the Impact of Development

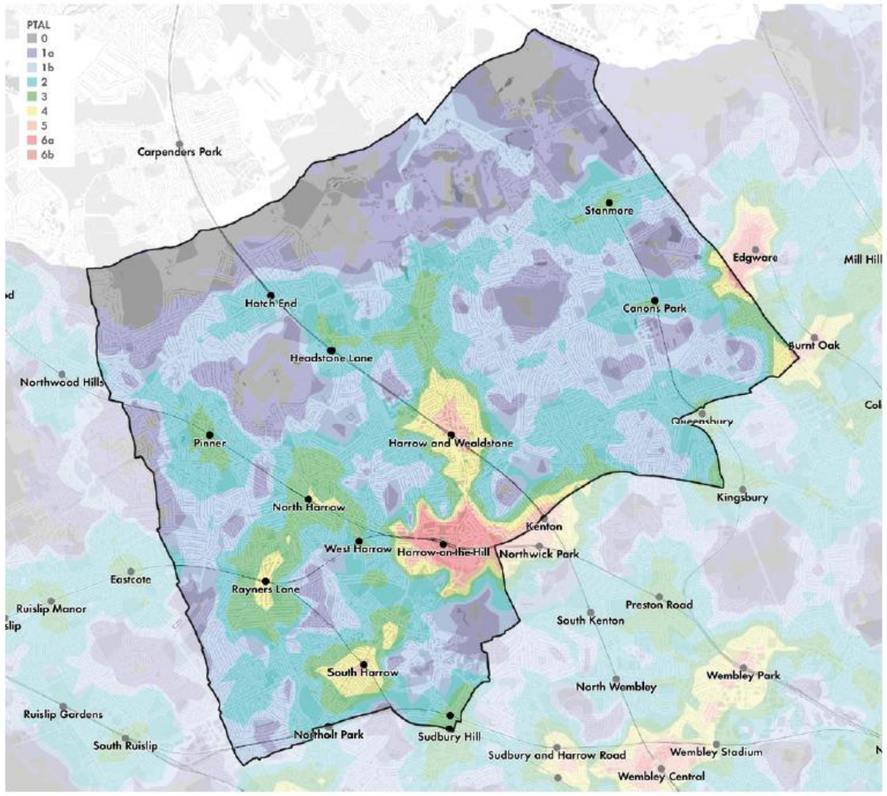
Change to correct the name of the document.

Ref	Chapter / page / policy	Modification	Reason for Modification
		10.1.6 Applicants must minimise the adverse transport impacts of development on the surrounding area and ensure that developments are consistent with policy objectives. To achieve this, the likely impact of development needs to be assessed through planning applications. The mitigation of any development should focus on reducing the need for, and impact of, private vehicles and provide increased opportunities for sustainable access through public transport, walking and cycling. 10.1.7 Different types of development will have different impacts on the environment and local surroundings. The impact of the development may be influenced by the following aspects: (a) Scale of development (b) Proximity to employment, town centres, services (retail / leisure etc) and community infrastructure (c) Characteristics of people using / visiting the development (d) Construction time (e) Servicing facilities (f) Proximity to public transport (PTAL Levels) (g) Surrounding road network and local service roads (h) Building accessibility (i) Available car parking (j) Available car clubs (k) Availability of electric vehicle charging facilities (l) Local car ownership (m) Local traffic conditions (n) Availability of parking permits (o) Local parking restrictions (p) Walking and cycling ease (q) Wayfinding and legibility (r) Bike hire facilities (s) Cycle path availability *Transport Assessments:* 10.1.8 Transport Assessments consider the impact of development on all forms of transport and explain how these impacts will be dealt with. Transport Assessments provide information on transport conditions and transport issues before, during and after completion of the development. Assessments should address impacts to public transport, the highway network, the strategic and local cycle network, and impacts on cyclists and pedestrians. 10.1.9 Transport Assessments need to demonstrate that the development will not have a negative impact on safety, cause congestion or lead to illegal or additional parking near the site of the proposed development. They must also show how the development is going to restrict car dependency, and improve, provide and promote sustainable travel through public transport and active travel. 10.1.10 Where multiple major developments are proposed an area, the Council will encourage developers to cooperate to assess the cumulative impacts of the proposals on the transport network. Transport Assessments should be proportionate to the scale of the development proposal. A transport assessment may still be required for smaller developments where the proposal is likely to have a significant transport impact. This will be agreed with applicants at pre-application stage. *Transport Statements:* 10.1.11 Transport Statements are a simplified Transport Assessment prepared as part of a ~~smaller scale~~ minor development application where the impact on local transport networks is likely to be of a smaller scale.	Grammatical change to make the Plan more effective.

Ref	Chapter / page / policy	Modification	Reason for Modification
		10.1.12 Applicants should demonstrate that the development proposal satisfies the Council's transport policies through a Transport Statement. The scope of any transport statement should be agreed with the Council at pre-application stage in discussion with Traffic and Highways. A Transport Statement should outline the existing site conditions and the proposed transport aspects of the development design (parking, site access points, servicing arrangements, access to public transport, cycle parking provision). *Travel Plans:* 10.1.13 Travel Plans are an agreed set of measures that reduce reliance on private vehicles and as a result, reduce the impact of travel and transport on the environment (i.e car clubs, bike hire/storage, etc). This contributes to a reduction in fossil fuel use, energy consumption, the need to travel and reduced air pollution. 10.1.14 Travel Plans seek to ensure that once a development is occupied and operational, the management / mitigation measures identified through the transport assessment are implemented and their effectiveness monitored. Travel Plans play an important role in bringing forward initiatives that contribute to the achievement of a modal shift away from car use. 10.1.15 While Travel Plans should be developed as a standalone document, they should aim to address any issues identified within the associated transport assessment through the promotion of sustainable transport. 10.1.16 Travel Plans must be submitted as part of the initial planning application, alongside the Transport Assessment. ~~Travel Plans will be secured by way of a condition on the permission or a S106 planning obligation~~, which the applicant will need to continue to implement and manage over the lifetime of the development. The Council will require developer contributions by planning obligation for the monitoring and review of Travel Plans. *Public Transport* 2.0.12 Accessibility to public transport is important to ensure that people can move around Harrow with ease and connect with other parts of London. There is a need to continue to upgrade public transport infrastructure in the borough to facilitate the needs of the growing population and ensure that public transport remains an attractive and convenient mode of transport for all people in the borough. 10.1.17 Improvements to the accessibility and quality of public transport infrastructure are required in order to maximise its use, especially by people with disabilities, the elderly, young children and others for whom limited public transport accessibility is a barrier. Improvements to routes to and from public transport nodes (bus stops and stations) are critical in persuading people to use buses and trains. 10.1.18 Developers will be expected to contribute towards new and improved public transport infrastructure including improvements to access and capacity and considering cumulative impacts from related development where appropriate. Such impacts should be calculated with reference to projected trips from consented developments in the area and should assess how this will affect highway capacity and operation and demand for public transport services. 10.1.19 The key public transport infrastructure projects to be delivered during the plan period will be kept up-to-date in the Infrastructure Delivery Plan.	Change to improve the effectiveness of the plan. Modification to improve the effectiveness of the plan. Supporting text pursuant to the addition of part C of the policy to ensure that the policy addresses public transport improvements.
MM55	Policy M2 pp281-284	**Policy M2: Parking** A. Development proposals will be supported where: a. The number of vehicle parking spaces (including those with electric vehicle charging points) complies with the ~~maximum~~ London Plan standards;	Part Aa maximum is deleted to improve effectiveness.

Ref	Chapter / page / policy	Modification	Reason for Modification
		b. There is provision for 1 motorcycle parking space per 20 car parking spaces subject to all developments with more than 10 car parking spaces having a minimum of 1 space; ~~and~~ c. The number of cycle parking spaces would meet or exceed the minimum London Plan standards and comply with London Cycle Design Standards; d. Provide accessible, secure, and convenient cycle parking for all users, located in prominent locations, which meet or exceed London Plan requirements and London Cycle Design Standards. Facilities should include provision for charging of electric bikes; and e. Deliver accessible cycle parking for people using cargo bikes or adapted cycles, and for people who may not be able to lift bikes, ~~B. Proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements and satisfactory mitigation, any special safety considerations and the desirability of achieving modal shift away from private car use.~~ B. Sites which serve wide catchments in Harrow may need to continue to provide public car parking. On sites with existing public car parking in the Metropolitan and District Centres, or at strategic public transport, culture, or leisure nodes, any loss should be managed, based on an agreed local parking strategy. Any proposed reduction of car parking (either on-street or off-street) should consider the overall parking provision in the centre or locality, and should not adversely impact upon town centre vitality and viability. Proposals to improve the quality of existing off-street car parking will be supported and encouraged. C. Proposals that secure the delivery of car club schemes in lieu of parking provision for private vehicles will be encouraged. D. The design and layout of parking areas (including those for scooters, motorcycles and bicycles) should be safe, secure and fit for purpose, Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists in line with London Plan Policy T2 (Healthy Streets). E. Proposals that create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted unless appropriate mitigation measures can be put in place. F. Off-street parking should provide adequate soft landscaping, permeable surfaces and appropriate boundary treatments to offset adverse visual impacts and increases in surface water run-off. Parking on front gardens should provide a minimum 50% coverage of soft landscaping and permeable surfaces. Car park entrances must be of an acceptable width to ensure safe access and visibility. G. Development in Town Centres should prioritise walking, cycling and public transport, including access to and from town centres. The public realm will be designed to support modal shift away from car use. Services and activities within the public realm will be supported. London Plan car parking maximums for office, retail and hotel accommodation must be complied with. ~~H. Any proposed reduction of car parking (either on-street or off-street) should consider the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality in line with the Harrow Parking Strategy. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.~~ **Supporting Text:** 10.2.1 Parking for new development will be managed to contribute to the delivery of a modal shift from private cars to more sustainable modes, with an emphasis on active travel and public transport. Development should provide parking in accordance with standards set by the London Plan. 10.2.2 Notwithstanding part B of the policy, c~~C~~ar free developments should be the starting point in areas that are well connected to public transport (PTAL 4-6). Developments in areas with lower public transport connectivity (PTAL0-1) should adhere to maximum parking standards as set by the London Plan, except where a minimum provision would support additional family housing.	Modifications made in the following the agreement of a Statement of Common Ground with TfL and for consistency with the London Plan. Part B deleted to remove duplication with other plan policies. New Part B added to replace part H (deleted), and add clarity around the parts of the borough in which reductions in public car parking need to be carefully managed to ensure ongoing town centre vitality and viability, so as to be consistent with national policy. Modification to Part E to improve flexibility of the Policy. Part H deleted and incorporated into Part B.

Public Transport Accessibility Levels (PTAL)



Source: Harrow Characterisation and Tall Buildings Study (2021)

10.2.3 All development must include infrastructure for EV and ultra-low-emissions vehicles in conformity with London Plan Policy T6 (G). Proposals with higher rates of EV charging infrastructure (>50% of overall spaces with active charging points) will be looked upon favourably. Proposals in the public realm should consider the provision of publicly accessible charging points, in line with the Council's EV Strategy. Proposals for office or commercial development should include publicly accessible charging points where possible. The integration of bike and car sharing clubs should be strongly considered.

10.2.4 Households in Harrow continue to exhibit comparatively high levels of car ownership. It is likely that car ownership will continue to be a preference for many residents and that this mode will continue to be a component of economic activity and outer London inter-connectivity for the foreseeable future.

10.2.5 The objective of this policy is to realise the transport benefits of Harrow's spatial strategy by ensuring that proposals contribute to modal shift and meet the transport needs of future occupiers of developments. This will be achieved by focusing new development in areas of high public transport accessibility and where access to services is possible by sustainable transport modes such as walking and cycling.

10.2.6 Transport is a matter of strategic significance to London as a whole and is therefore addressed in the NPPF (2021) and the London Plan (Chapter 10 Policy T6). The London Plan sets standards for car parking of all types, development proposals must comply with these standards.

10.2.7 There is greater demand for car use in outer London given its lower-density, suburban nature and lower levels of public transport accessibility and sustainable transport options. Due to the demand generated by occupiers and users of development in outer London it is anticipated that developers will continue to seek to provide parking as part of their

Ref	Chapter / page / policy	Modification	Reason for Modification
		proposals. In many instances some level of vehicle parking is likely to be necessary for operational reasons. On-site provision of vehicle parking can overcome some issues with on-street parking particularly in residential areas where on-street parking can result in congestion and hindrance to traffic flow. 10.2.8 The London Plan specifies maximum general parking standards. Minimum standards are set with respect to disabled parking, cycle parking and the percentage of car parking spaces that must have active provision for electric vehicle charging. London Plan guidance must be followed as it refers to outer London PTAL levels, and space numbers must not exceed the maximum standard outlined in the London Plan. 10.2.9 Car free developments are those that make no general on or off-site provision for car parking other than that required to meet the needs of disabled persons. Where located in areas of ~~high public transport accessibility levels (~~PTAL4-6~~)~~ and access to services through sustainable transport modes, such schemes are an effective means of delivering a modal shift away from private car use. Public parking plays an important role in underpinning the vitality and viability of town centres, enabling a choice of modes, representing the wide range of goods and services visited within them. Public parking enables visitation from areas that are not well connected by public transport, and enable families to conveniently travel together, as well as facilitating the collection of bulky goods. This extends to other strategic assets, including leisure and cultural facilities that serve a sub-regional catchment, and parking at transport nodes that underpin mixed-mode travel within north London, and actively reduce congestion. ~~New development must demonstrate that future occupiers' ability to access their reasonable shopping, service and employment needs would not be disadvantaged, and that visitors and other users of the development (particularly in respect of non-residential uses) would not be severely disadvantaged by the absence of car parking.~~ In Harrow, the Harrow & Wealdstone Opportunity Area and town, district, and neighbourhood centres with a PTAL of 4~~5~~-6 provide the most suitable locations for car-free development. They provide occupiers with direct access to local shops, services and employment opportunities, and are generally served by multiple local bus services and/or a rail station for access to shops, services and employment elsewhere. The rationalisation of public car parks will be managed in accordance with a local parking strategy. 10.2.10 Applicants should provide detailed Parking Design and Management plans as part of any application proposing implementation of car parking. The Plans should detail all aspects outlined in the London Plan. Consideration should be given for adequate emergency vehicle parking and, where relevant, health and social care vehicles. 10.2.11 Development ~~in the Harrow & Wealdstone Opportunity Area and Town Centres~~ should prioritise walking, cycling and public transport. Infrastructure to support modal shift away from fossil fuel car use should be prioritised by any development including: (a) Safe and secure bike parking (ideally covered with CCTV in operation in accordance with London Cycling Design Standards); (b) Rapid electric vehicle charging points; (c) Parking spaces for shared electric bikes and scooters; (d) Installation of cycle lanes; (e) High quality pedestrian thoroughfares.	Supporting text (10.2.9) amended to reflect the amalgamation parts B & H of the policy and the overall approach to management of public car parking within the policy, in order to improve its effectiveness. Modification to 10.2.11 to reflect the policy makes no geographical distinction.
MM56	Policy M3 up to para 10.3.5 pp284-285	*London Plan Policy T7 Deliveries, servicing and construction* **Policy M3: Deliveries, Servicing and Construction** Development proposals which facilitate sustainable freight movement by rail, waterways and road where appropriate, will be supported in line with Policy T7 of the London Plan. All development proposals should seek to minimise the adverse impacts of deliveries, freight and servicing by:	

Ref	Chapter / page / policy	Modification	Reason for Modification
		A. Reducing the number freight, servicing and delivery trips to and from developments at the construction and operational phases, including use of cargo bikes and zero emission vehicles for last mile deliveries and area or time restrictions on freight movements where appropriate. B. Demonstrating through the submission of a Construction Logistics Plan (Major applications only), that any impacts on the transport network during the construction phase of the development (including road closures and damage to the transport network) will be managed and mitigated to the satisfaction of the Council. C. Demonstrating that the proposal and site layout make adequate provision for emergency services access, deliveries, servicing, refuse collection, and visitor drop-off and pickups. D. Arranging construction deliveries outside of peak hours and in the evening or night-time. E. Where appropriate, promoting facilities to enable efficient online retailing and minimise additional freight trips arising from missed deliveries, including storage lockers or concierge services. F. Facilitating efficient, safe and low-emission delivery and servicing trips in accordance with TfL's latest guidance on Delivery and Servicing Plans. **Supporting Text** *Construction Logistics* 10.3.1 The construction phase of development can present significant logistic and environmental challenges particularly for large, complex and constrained sites or sites that are located in town centres, residential areas or near schools. Construction typically generates a significant number of vehicle trips, often involving heavy goods vehicles and machinery. These trips should be considered and mitigated to minimise disruption and safety hazards in accordance with TfL's Construction Logistics Plan Guidance. Any damage to road surfaces caused by vehicle movements to, from and around the development site will be repaired at a cost to the applicant. The Construction Logistics Plan should prioritise the maintenance of safe and inclusive access for pedestrians, cyclists and public transport users. ~~TfL Delivery and Servicing Plan guidance should be followed.~~ 10.3.2 Construction works will need to secure the necessary approvals and licenses from the Council's Highways Department a minimum of 60 days before commencement of works. Financial contributions may be sought to ensure that disruption to roads is minimised, and any damage is repaired. *Deliveries and Servicing* 10.3.3 Deliveries and servicing are often thought of late in the design of developments, which can lead to poor outcomes for occupants and disruption to the highway network. To avoid this, the logistics of servicing and deliveries must be considered early in the design of developments. TfL Delivery and Servicing Plan guidance should be followed. 10.3.4 Since the pandemic there has been an increase in online shopping and home deliveries leading to increase delivery trips, often using heavy goods vehicles. This results in more traffic on the roads, particularly using larger vehicles that stop often for pick-ups and drop-offs. These vehicles can cause congestion and are often required to stop in areas not designated for loading, which can in turn disrupt traffic, cyclists, pedestrians and parking. Ensuring that there is a safe and easily accessible area for goods and servicing vehicles in the early stages of development must be a priority. 10.3.5 Where a development is likely to generate a significant amount goods or delivery vehicles trips, a Delivery and Servicing Plan will be required in accordance with TfL's latest guidance. These plans are required to improve the safety, efficiency and sustainability of delivery and servicing vehicles through interventions including consolidation, low carbon delivery modes and the retiming of movements to avoid peak hours. Consideration should be given to onsite electric charging infrastructure and parking to support low carbon fleets including e-cargo bikes, where appropriate. Consideration should also be given to the	Modification in line with Statement of Common Ground agreed with TfL to make the policy more effective. Amendment to Part B for effectiveness. Amendment to 10.3.1 and 10.3.3 to correct a typographic error.

Ref	Chapter / page / policy	Modification	Reason for Modification
		role of, and opportunities for, shared consolidation facilities for deliveries and servicing including micro consolidation hubs as a means of minimising vehicle movements, reducing overall levels of congestion and improving road safety.	Amendment to 10.3.5 to provide clarity.

Chapter 11 – Site Allocations

<table>
<tr><th>Ref</th><th>Chapter /page/policy number</th><th>Modification</th><th>Reason for Modification</th></tr>
<tr><td><u>MM57</u></td><td>Paras 11.1-11.3

P288</td><td>Introduction
11.1 This chapter identifies sites which are allocated for a particular use or development, as set in in Policy GR12: <u>Delivery of</u> Site Allocations. It does not include every potential development site in the Borough. Rather if focuses on a series of sites which have been identified and assessed during the preparation of the local plan as suitable for development, achievable and available to come forward during the lifetime of the plan. These sites form part of a development pipeline which will meet the Borough's targets for additional housing including a buffer to accommodate potential under-delivery. Other sites may come forward as 'windfall' sites during the plan period and an allowance has been included in the housing supply / trajectory to reflect this.
11.2 Sites are also allocated where required to accommodate additional non-residential and infrastructure development to meet identified need.
11.3 The Council considers the uses set out in this chapter to be the most appropriate for each site and in line with existing and emerging planning policies. A site being allocated for <u>a</u> certain use(s) within this document does not guarantee planning permission - this will be decided by the merits of the application when it is submitted, and will need to be assessed against the full suite of Development Plan policies (including this chapter and Policy GR12: <u>Delivery of</u> Site Allocations).</td><td>Modification to para 11.1 and 11.3 to reflect the amended title of the policy.</td></tr>
<tr><td><u>MM58</u></td><td>Para 11.10 p290</td><td>11.10 Following this process, adjacent sites were amalgamated into a single proposed allocation and additional adjoining parcels added in cases where site amalgamation (or failing that a consolidated design approach) would better optimize overall site outcomes and capacity, or would lead to development proceeding in a more rational way, as set out in paragraph D of Policy GR12: <u>Delivery of</u> Site Allocations.</td><td>Modification to para 11.10 to reflect the amended title of the policy.</td></tr>
<tr><td><u>MM59</u></td><td>Paras 11.20-11.21 & List of Sites Table

Pp291-293</td><td>List of sites
11.20 The sites are listed below. In each case a~~n indicative~~ <u>minimum</u> residential capacity has been provided, which refers to the number of ~~C3~~ dwelling houses / units or equivalent where not otherwise stated. ~~The contribution to the housing trajectory of each site has also been provided, noting the 10% uplift applied as discussed above.~~

11.21 <u>Each of the sites located within the Harrow & Wealdstone Opportunity Area, as well as those that are suitable for mixed-use development in the rest of the borough have been provided with a minimum non-residential floorspace capacity. The floorspace capacity provided by way of the site capacity testing noted above.</u>

11.22 A summary of the non-residential land uses allocated for each site is also provided. These summaries are intended as a consolidated reference only, and the more detailed site allocations should be referred to in each case for the wording of allocated uses.
<table>
<tr><th>Site Ref.</th><th>Name</th><th><u>~~Contribution to housing trajectory~~ Minimum Residential Capacity</u></th><th><u>~~Indicative Residential Capacity~~ Minimum non-residential floorspace capacity (GIA)</u></th><th>Non-residential land uses</th></tr>
<tr><td colspan="5">Opportunity Area</td></tr>
<tr><td>OA1</td><td>Queen's House Carpark</td><td>142</td><td><u>~~129~~ 2,119sqm</u></td><td>Town centre uses
<u>~~Car parking~~</u></td></tr>
</table></td><td>Modification to para 11.20 to reflect that housing capacities in the site allocations are minimums to ensure the policy is positively prepared. Deletion of text in relation to 10% uplift as this is now included in minimum capacity figures where relevant.

Addition of para 11.21 to reflect the inclusion of non-residential floorspace in the relevant site allocations and the floorspace areas are minimums to ensure the policy is positively prepared

Modification to table to identify minimum housing capacity and minimum non-residential floorspace for each site allocation to ensure the policy is positively prepared and effective.</td></tr>
</table>

Ref	Chapter /page/policy number	Modification					Reason for Modification
		OA2	Harrow on the Hill Underground and Bus Stations	399	~~363~~ 4,854sqm	Rail & bus transportation hub Town centre uses	Modifications made under heading 'Non-residential land uses' to provide factual updates (to the detailed site allocations) and to ensure respective allocations are justified and effective.
		OA3	15-29 College Road	95	~~86~~ 892sqm	Town centre uses Public realm Reprovision of place of worship / social infrastructure	
		OA4	Havelock Place	323	~~294~~ 2,580sqm	Town centre uses	
		OA5	Station Road East, Harrow	188	~~171~~ 718sqm	Town centre uses	
		OA6	Greenhill Way	408	~~371~~ 936sqm	Town Centre Uses NHS floorspace Community / civic uses Public house ~~Car parking~~ Public open space	
		OA7	Tesco Station Road	50~~0~~9	~~500~~ 7,130sqm	Supermarket	
		OA8	Former Royal Mail Postal Delivery Office, Elmgrove Road	20	~~18~~ 250sqm	Industrial	
		OA9	Poet's Corner & Milton Road	1,~~139~~051	~~1139~~ 2,000sqm	Town centre uses to serve development NHS floorspace Community floorspace Designated Open space	
		OA10	Wealdstone Probation Office	20	~~18 (hostel accomm.)~~ 320sqm	Replacement employment space (industrial or related)	
		OA11	Carpark Ellen Webb Drive	201	~~183~~ 683sqm	Hotel Town centre uses Car parking reprovision	
		OA12	Peel Road	228	~~207~~ 2,930sqm	~~Car parking~~ Place of worship Civic / community uses NHS floorspace	
		OA13	Travis Perkins Wealdstone	~~20~~ 40	~~18~~ 1,649sqm	Industrial (or related)	
		OA14	Byron Quarter	702	~~683~~ 12,444sqm	Leisure & community uses ~~Car parking~~ NHS floorspace	
		OA15	Iceland Wealdstone	28	~~25~~ 485sqm	Retail	
		OA16	Kodak	2,~~675~~388	~~2675~~ As secured in extant	Industrial and employment (B2 & B8) NHS floorspace E use class to service development and immediate area	

Ref	Chapter /page/policy number	Modification					Reason for Modification
					planning permissions	F1 learning and non-res. Institutions including primary school Community centre Green link	
		OA17	Former Kodak Administration Offices	~~132~~124	~~120~~ 625sqm	Flexible employment space	
		Green belt					
		GB1	Royal National Orthopaedic Hospital (RNOH)	~~500~~	~~500~~	Hospital Research & innovation institutions Green Belt	
		GB2	Watling Farm	~~12~~ 13 additional gypsy & traveller pitches	~~12 13 additional gypsy & traveller pitches~~		
		Other sites					
		O1	Waitrose South Harrow	136	~~124~~ 3,040sqm	Supermarket	
		O2	Roxeth Library & Clinic	17	~~15~~ 700sqm	Community uses Town centre uses NHS floorspace	
		O3	Northolt Road Nursery and Carpark at rear of 27 Northolt Road	41	~~37~~ 950sqm	Nursery Offices Designated Open Space	
		O4	Grange Farm	~~300~~292	~~300~~	Community hub Designated Open space	
		O5	Harrow School Estate & John Lyon School	N/A	~~N/A~~	Refurbishment / redevelopment of school buildings, sports facilities and enhancement of playing fields	
		O6	Brethrens' Meeting Hall, The Ridgeway	N/A	~~N/A~~	School	
		O7	Rayners Lane Station Carpark	76	~~69~~	~~Car parking~~ Town centre uses (eastern part of site only)	
		O8	Harrow West Conservative Association	14	~~13~~ 370sqm	Community or employment space	
		O9	Pinner Telephone Exchange	48	~~44~~		
		O10	Harrow View Telephone Exchange	30	~~27~~		
		O11	North Harrow Methodist Church	36	~~33~~ 860sqm	Church & community facilities Limited retail use	
		O12	Hatch End Telephone Exchange	48	~~44~~ 200sqm	Town centre uses (within designated shopping frontage)	
		O13	Harrow Arts Centre	N/A	~~N/A~~	Arts centre & associated uses	
		O14	Vernon Lodge	~~56~~28	~~56 (specialist older persons accomm.)~~		

<table>
<tr><th>Ref</th><th>Chapter /page/policy number</th><th>Modification</th><th>Reason for Modification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>O15</td><td>Belmont Clinic</td><td>~~N/A~~10</td><td>~~N/A~~</td><td>Health care centre
Community or town centre uses</td></tr>
<tr><td>O16</td><td>Travellers Rest, Kenton Road</td><td>120</td><td>~~109~~
1,619sqm</td><td>Hotel
Public house
Town centre uses</td></tr>
<tr><td>O17</td><td>Kenton Road Telephone Exchange</td><td>13</td><td>~~12~~</td><td>Town centre uses
Community uses</td></tr>
<tr><td>O18</td><td>Wolstenholme</td><td>2~~8~~5</td><td>~~Net 25 C2 units (specialist older person housing)~~</td><td></td></tr>
<tr><td>~~O19~~</td><td>~~Marsh Lane Gas Holders~~</td><td>~~77~~</td><td>~~70~~</td><td></td></tr>
<tr><td>O20</td><td>Canons Park Station Carpark</td><td>29</td><td>~~26~~</td><td>Public Car parking to support multi-modal travel</td></tr>
<tr><td>O21</td><td>Anmer Lodge</td><td>~~141~~138</td><td>~~141~~
1,600sqm</td><td>Town centre uses including supermarket (1,600 sqm)
Car parking</td></tr>
<tr><td>O22</td><td>Stanmore Station Carpark</td><td>199</td><td>~~183~~ 660sqm</td><td>Public Car parking to support multi-modal travel
Transport operations
Class E</td></tr>
</table>
</td><td></td></tr>
<tr><td>MM60</td><td></td><td>
Housing trajectory
11.22 Allocated sites create potential capacity for 8,166 ~~8,882~~ dwellings (from 2024), of which 6,866 ~~6,974~~ are in the Opportunity Area and 1,300 ~~1,902~~ outside of it. The breakdown of this capacity into time periods, as well as the other elements of the housing trajectory / supply pipeline, are shown in the following table.
<table>
<tr><th>~~Category~~</th><th></th><th>~~Past completions (19/20 – 23/24)~~</th><th>~~Pre-adoption (24/25 – 25/26)~~</th><th>~~Years 1-5 (26/27 - 30/31)~~</th><th>~~Years 6 – 10 (31/32 – 35/36)~~</th><th>~~Years 11 – 15 (36/37 – 40/41)~~</th><th>~~Total~~</th></tr>
<tr><td colspan="2">~~Surplus housing delivered between 19/20 – 20/21~~</td><td>~~454~~</td><td></td><td></td><td></td><td></td><td>~~454~~</td></tr>
<tr><td rowspan="3">~~Completions 21/22 – 23/24~~</td><td>~~Opp. Area~~</td><td>~~1,464~~</td><td>-</td><td>-</td><td>-</td><td>-</td><td>~~1,464~~</td></tr>
<tr><td>~~Outside Opp. Area~~</td><td>~~460~~</td><td>-</td><td>-</td><td>-</td><td>-</td><td>~~460~~</td></tr>
<tr><td>~~*Total*~~</td><td>~~*1,924*~~</td><td>-</td><td>-</td><td>-</td><td>-</td><td>~~*1,924*~~</td></tr>
<tr><td></td><td>~~Opp. Area~~</td><td>-</td><td>~~365~~</td><td>~~257~~</td><td></td><td>-</td><td>~~622~~</td></tr>
</table>
</td><td>Modification to original para 11.22 to provide a factual update to housing figures across the borough.

Modification to delete the housing trajectory and replace with a revised housing trajectory that provides an annualised housing delivery figure (including a lapse rate) over the local plan period. Modification ensures an effective and justified policy. Deletion of site O19 Marsh Lane Gas Holders</td></tr>
</table>

Ref	Chapter /page/policy number	Modification								Reason for Modification
		~~Under construction~~	~~Outside Opp. Area~~	-	~~357~~	~~74~~		-	~~431~~	
			~~*Total*~~	-	~~*722*~~	~~*331*~~		-	~~*1,053*~~	
		~~Permissions or legal agreements~~	~~Opp. Area~~	-	~~17~~	~~100~~		-	~~117~~	
			~~Outside Opp. Area~~	-	~~92~~	~~330~~		-	~~422~~	
			~~*Total*~~	-	~~*109*~~	~~*430*~~		-	~~*539*~~	
		~~Non-conventional supply~~	~~Opp. Area~~		~~5~~	~~1~~	~~0~~			
			~~Outside Opp. Area~~		~~58~~	~~-68~~	~~0~~			
			~~*Total*~~		~~*63*~~	~~*-67*~~	~~*0*~~			
		~~Small sites windfall~~			-	~~375~~	~~1,875~~	~~1,875~~	~~4,125~~	
		~~Allocations~~	~~Opp. Area~~	-	~~869~~	~~2,992~~	~~2,333~~	~~780~~	~~6,974~~	
			~~Outside Opp. Area~~	-		~~466~~	~~1,211~~	~~231~~	~~1,908~~	
			~~*Total*~~	-	~~*869*~~	~~*3,458*~~	~~*3,544*~~	~~*1,011*~~	~~*8,882*~~	
		~~Total~~	~~Opp. area~~	~~1,633~~	~~1,256~~	~~3,350~~	~~2,333~~	~~780~~	~~9,352~~	
			~~Outside Opp. Area~~	~~745~~	~~507~~	~~802~~	~~1,211~~	~~231~~	~~3,496~~	
			~~Small sites~~		~~0~~	~~375~~	~~1,875~~	~~1,875~~	~~4,125~~	
			~~*Total*~~	~~*2,378*~~	~~*1,763*~~	~~*4,527*~~	~~*5,419*~~	~~*2,886*~~	~~*16,973*~~	

MM61 Housing Trajectory – With 17% lapse rate applied to unimplemented planning permissions on small sites

Site Ref	Site Name	Min Resi Capacity	Pre-Adoption					Years 1-5					Years 6-10					Years 11-15				
			21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
OA1	Queens House car park	142											142									
OA2	Harrow-on-the-Hill Station	399														133	133	133				
OA3	15-29 College Rd	95																95				
OA4	Havelock Place	323											55	55	55	55	55	48				
OA5	Station Rd East	188											94	94								

Site Ref	Site Name	Min Resi Capacity	Pre-Adoption					Years 1-5					Years 6-10					Years 11-15				
			21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41
OA6	Greenhill Way	408														136	136	136				
OA7	Tescos	509								255		254										
OA8	Royal Mail sorting office	20											20									
OA9	Poets Corner	1,051									265	265	174	174	173							
OA10	Wealdstone Probation	20											20									
OA11	Ellen Webb Drive	201											101	100								
OA12	Peel Rd car park	228															114	114				
OA13	Travis Perkins Wealdstone	40											40									
OA14	Byron Quarter	702							74	75			138	138	138	139						
OA15	Iceland Wealdstone	28											28									
OA16	Kodak	2,388				317	256	136	0	433	506	482	59	100	99							
OA17	Former Kodak Admin	124							124													
O1	Waitrose South Harrow	136																136				
O2	Roxeth Library & Clinic	17																	17			
O3	Nursery Northolt Rd & Car Park r/o Northolt Rd	41											41									
O4	Grange Farm	292							45				124	123								
O7	Rayners Ln Station car park	76											76									
O8	Harrow W Conservative Association	14													14							
O9	Pinner Telephone Exchange	48															48					
O10	Harrow View Telephone Exchange	30														30						
O11	N Harrow Methodist Church	36																36				
O12	Hatch End Telephone Exchange	48													48							
O14	Vernon Lodge	28												28								
O15	Belmont Clinic	10																				10
O16	Travellers Rest	120								120												
O17	Kenton Rd Telephone Exchange	13											13									
O18	Wolstenholme	25																25				
O20	Canons Park Station car park	29											29									
O21	Amner Lodge	138							69	69												
O22	Stanmore Station Car Park	199													100	99						
Completions 2021-2024		1,929	513	643	773																	
140 Northolt Rd & Units 1-2 Northolt Rd Retail park		191					95	96														
Halfords site, Sheepcote Rd		149				149																
Greenhill Way Phase 0		49				49																
Extant Small Sites @1/4/24 (with Lapse) + windfall		6,345				365	365	365	375	375	375	375	375	375	375	375	375	375	375	375	375	375
TOTAL COMPLETIONS		16,829	513	643	773	880	716	597	687	1,327	1,146	1,376	1,529	1,187	1,002	967	813	1,146	392	375	375	385

Ref	Chapter /page/policy number	Modification
MM62	Policy OA1 pp295-296	**Reason for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Reference to parking standards to add clarity and effectiveness with respect to amended policy M2 of the Local Plan Modification to development principle in relation to tall buildings to ensure a flexible and effective policy

Site OA1 – Queen's House Carpark

Site Map retained as submitted

Site information	
Address:	Multi-storey Car park, Kymberley Road, Harrow
Area:	0.32 ha
Description	Site consists of a five storey multi storey car park building facing onto the south side of Kymberley Road and opposite St George's Shopping Centre. Immediately to the east is a large residential block, Queens House, which was converted from offices to flats. To the immediate west lies the five-storey car park entrance ramp to St George's Shopping Centre.
Current use	Multi-level carpark
Ownership	Private
PTAL	6a
~~Site source~~	~~Call for sites~~
Relevant planning applications	N/A
Site allocation	
Site objective	Deliver a mixed-use development that provides high quality residential homes and appropriate town centre uses the Harrow Metropolitan Town Centre, ~~while ensuring a satisfactory reprovision of car parking spaces~~. New development will improve the quality of the character of the area and enhance the public realm and local connectivity.
Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Town centre appropriate use ~~Reprovision of carparking spaces~~
Development timeframe	6-10 years
~~Indicative~~ Minimum residential capacity	142 ~~129 C3~~ dwelling houses / units or equivalent
Minimum non-residential floorspace capacity (GIA)	2,119sqm
Planning considerations	
Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly along the south west of the site. Safe access and egress routes should be directed to the north west of the site towards Kymberly Road where these is a lower risk of flooding. Development should be directed away from the southern and eastern areas of the site where there is a higher risk of surface water flooding.

Ref	Chapter /page/policy number	Modification
		Heritage: Protected Views Restricted Corridors (Harrow View, Old Redding) Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
		Other: Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) RAF Northolt Safeguarding Zone Tall Building Zone
		Development considerations
		Requirements: Public realm improvements ~~Car parking reprovision (public and private parking)~~ Provision of publicly accessible viewing opportunities to St Mary's Church (Harrow on the Hill)
		Development principles: The site is located within the Harrow Metropolitan Town Centre and Harrow & Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme. Active ground floor frontages must be provided to improve appearance from the public realm. Provide an improved pedestrian access / environment into the Harrow Town Centre Shopping Area and Harrow on the Hill Underground Station / Bus Station. Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre parking in accordance with Local Plan Policy M2B. ~~Re-provision of appropriate levels of car parking (both in relation to supporting re-development of the site and wider public car parking provision to serve the town centre) must be demonstrated~~ Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. The site ~~is~~ may be appropriate for tall building development, with consideration required to be taken in relation to the two protected viewing corridors which the site sits within. ~~The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development.~~
MM63	Site OA2 pp297-299	**Reason for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Reference to Transport for London operational requirements to add clarity and effectiveness Modification to development principle in relation to tall buildings to ensure a flexible and effective policy Thames Water requirements added to reflect infrastructure provision to ensure an effective policy.
		Site OA2 – Harrow on the Hill Underground and Bus Stations Site Map retained as submitted **Site information** Address: Harrow on the Hill Underground and Bus Stations, Harrow HA1 1BY

Ref	Chapter /page/policy number	Modification	
		Area:	1.10 ha
		Description	Comprises the Harrow on the Hill bus station and Railway station, an office block (5 storey, excluding ground level bus station), commercial retail, hot food uses, a surface and multi storey car park. It is owned by TfL and is located within the Harrow Metropolitan Town Centre and Opportunity area. A number of sites within proximity to the site have been recently developed for high-density mixed-use development.
		Current use	Train station Multi-level and surface level carpark Bus interchange Office building
		Ownership	Public
		PTAL	6b
		~~Site source~~	~~Call for sites~~ ~~Allocation in Harrow & Wealdstone Area Action Plan 2013 (part)~~
		Relevant planning applications	N/A
		Site allocation	
		Site objective	Redevelopment of the site to provide a landmark / wayfinding development that will deliver housing, town centre uses and an enhanced public transport hub. An enhanced transport hub must deliver greater accessibility (including step free access from the southern entrance of the train station) and ensure transportation capacity is met over the plan period in line with TfL's future requirements.
		Allocated use	**Leading land use** Residential Rail and bus transportation hub ~~**Supporting land use(s)**~~ Appropriate town centre uses
		Development timeframe	Phased development in 6-10 and 11-15 year plan period~~s~~
		~~Indicative~~ Minimum residential capacity	399 ~~363~~ ~~C3~~ dwelling houses / units or equivalent
		Minimum non-residential floorspace capacity (GIA)	4,854sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly along Station Approach. Safe access and egress routes should be directed to the northwest of the northern site towards College Road and southwest of the southern site towards Lowlands Roads where there is a lower risk of flooding. Development should be directed away from the northern area of the northern site and southeast area of the southern site where there is a higher risk of surface water flooding.
		Heritage	Protected Views Restricted Corridors (Gayton Road, Old Redding, Stanmore Country Park Extension Wood Farm & St Anns Rd)

Ref	Chapter /page/policy number	Modification	
			Protected Views Setting Corridors (Capital Ring Capital Ring, Football Lane, Gayton Road, The Grove, Old Redding, Stanmore Country Park Extension Wood Farm & Roxborough Road Bridge) Conservation Area (Roxborough Park and The Grove Conservation Area) adjoins site
		Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Tall Building Zone RAF Northolt Safeguarding Zone Metropolitan Open Land adjoins site
		Development considerations	
		Requirements	Provision of step free access to the southern side of the Harrow on the Hill underground station. Enhanced public realm on the southern side of the Harrow on the Hill underground station and its interface with the Lowlands Recreation Ground. ~~Improved bus station to provide for capacity over the plan period and proposed electrification of the bus fleet~~. Provision of an enhanced bus station to accommodate the future bus network; including capacity for forecast growth and the necessary infrastructure for the zero emission bus fleet. Improved pedestrian access and environment from the Harrow on the Hill Underground Station into Harrow Town Centre Provision of publicly accessible viewing opportunities to St Mary's Church (Harrow on the Hill)
		Development principles	The site is located within the Harrow Metropolitan Town Centre and Harrow & Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme. New development must assist in enabling the delivery of an enhanced public transport hub. It should include provision of step free access (south side of station) and a more successful public realm to both sides of the station. Specifically, the access from the station into Harrow Town Centre is a poor environment, and measures shall be taken to improve this relationship. Public realm improvements should improve the connectivity from the station into the Harrow Town Centre, especially improving the nighttime environment to assist with safety of users (perceived or real). ~~Redevelopment of the site must ensure a modernised bus station be delivered to ensure sufficient capacity over the plan period and includes the necessary infrastructure for the electrification of the network.~~ Redevelopment of the site must ensure delivery of a modernised and enhanced bus station, which meets TfL's Passenger and Operational Requirements for the future bus network; including capacity for forecast growth and the necessary infrastructure to accommodate the zero emission fleet. To the south side of the station, public realm should be improved to enhance the connectivity of the entrance to the station with Lowlands Recreation Ground. An improved vehicle pick up / drop off point for station users to the south side will be supported. Ground floor elements of any development must be appropriate for the Metropolitan Town Centre and provide active frontages. Through residential development create overlooking / natural surveillance to both sides of the Station approach The site ~~is~~ may be appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary's Church on Harrow on the Hill. New development must ensure that publicly accessible viewing opportunities are maintained. The site is also located within the RAF Northolt safeguarding zone.

Ref	Chapter /page/policy number	Modification
		Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. Early engagement with Thames Water should be entered into. Sufficient time is required to undertake network assessment modelling for the development and its impacts on drainage requirements (on and off site) and clarity in relation loading / flow from the development. The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development.
MM64	Site OA3 pp300-302	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order, reference to former site allocation) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Modification to development principle in relation to tall buildings to ensure a flexible and effective policy

Site OA3 – 15-29 College Road
Site Map retained as submitted

Site information	
Address:	15-29 College Road, Harrow HA1 1BA
Area:	0.38 ha
Description	~~The remainder of a previous site allocation that has been part-implemented, which is the development at 51 College Road which includes the Harrow Greenhill public library. The remainder of t~~The site comprises Amba House (15 College Road), the Harrow Baptist Church and the three-story parade of shops to the west of Amba House that fronts onto College Road.
Current use	Office Some residential in a building that has undergone prior approval conversion from office Retail Church
Ownership	Private
PTAL	6b
~~Site source~~	~~Allocation in Harrow & Wealdstone Area Action Plan 2013~~
Relevant planning applications	Permission for additional two storeys at 31-33 College Road (P/0203/23/PRIOR)
Site allocation	
Site objective	Re-development of residential and town centre uses which improves the public realm fronting onto College Road and the interface with the public realm at the rear of the site

Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Town centre uses Public Realm Reprovision of place of worship / social infrastructure
Development timeframe	11-15 years
~~Indicative~~ Minimum residential capacity	95 ~~86 C3~~ dwelling houses / units or equivalent
Minimum non-residential floorspace capacity (GIA)	892sqm
Planning considerations	
Flood zone	Critical drainage area
Heritage	Locally Listed Buildings (361, 365, 367 & 369 Station Road) adjoin site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridors (The Grove & Old Redding)
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Primary Shopping Area RAF Northolt Safeguarding Zone Tall Building Zone
Development considerations	
Requirements	Provide improved public realm fronting onto College Road whilst improving the relationship and connectivity with the public realm to the rear (part of 51 College Road / Greenhill Library).
Development principles	The site is located within the Harrow Metropolitan Town Centre and Harrow & Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme. New development must relate to both the public realm fronting College Road, and also with the large-scale development to the south (adjacent to the railway) which formed part of the wider site allocation under the former AAP. Fronting College Road, any new development must provide for appropriate town uses with active frontages, and also activate the rear ground floor elevation fronting into the public realm located to the rear. To the rear of the site, the Greenhill Library is located as delivered under part of the wider (and previous allocation) site. Any new development must seek to improve access from College Road into the rear of the site to both utilise the public realm and access the public library. Opportunities to improve the public realm to the rear of (17 – 29 College Road) should be delivered to improve this area. Detail around servicing must be demonstrated. Residential development on the upper floors is appropriate and can provide natural surveillance of the public realm to the front and rear of the site. The design of any new development must take design queues from the existing major development to the rear of the site, to ensure consistency of design across the site. The site ~~is~~ may be appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary's Church on Harrow on the Hill. New development must ensure that publicly accessible viewing opportunities are maintained. The site is also located within the RAF Northolt safeguarding zone.

Ref	Chapter /page/policy number	Modification
MM65	Site OA4 pp303-304	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order, cross-referencing to other local plan policy) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Modification to development principle in relation to tall buildings to ensure a flexible and effective policy Delivery timeframe updated to ensure effective policy Deletion of unnecessary cross-reference to Local Plan policy

Site OA4 – Havelock Place

Site Map retained as submitted

Site information	
Address:	Havelock Place, Harrow
Area:	0.95 ha
Description	A backland site located between St Anns Road and College Road which provides servicing facilities to premises on Station Road and to Marks & Spencer. A free-standing office block is located to the rear of the M&S service yard.
Current use	Shops fronting College Road / St Ann's Road Loading facilities at rear Office building
Ownership	Private
PTAL	6a, 6b
~~Site source~~	~~Call for sites~~ ~~Allocation in Harrow & Wealdstone Area Action Plan 2013~~
Relevant planning applications	
Site allocation	
Site objective	
Allocated use	**Leading land use** Residential Town centre uses ~~**Supporting land use(s)**~~ Public Realm
Development timeframe	~~1-5,~~ 6-10 and 11-15 year plan periods
~~Indicative~~ Minimum residential capacity	323 ~~294 C3~~ dwelling houses / units or equivalent
Minimum non-residential floorspace capacity (GIA)	2,580sqm
Planning considerations	
Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~

Ref	Chapter /page/policy number	Modification

	Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
Heritage	Locally Listed Building (14 College Road) Locally Listed Buildings (329, 333, 335, 339, 341, 345, 347 & 351 Station Road) adjoin site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridors (The Grove, Old Redding)
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Primary Shopping Area RAF Northolt Safeguarding Zone Tall Building Zone - Part of Site
Development considerations	
Requirements	Public realm improvements as part of any redevelopment
Development principles	The site is located within the Harrow Metropolitan Town Centre and Harrow & Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme. The site is appropriate for residential development with appropriate town centre uses supporting this. Access to the site remains a challenge and new development will need to demonstrate appropriate access to the site including public realm improvements. The emerging Harrow Town Centre Masterplan will seek to set out appropriate routes / connections across the town centre, and new development on this site should respond positively to the guidance set out in the masterplan. The site ~~is~~ may be appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary's Church on Harrow on the Hill. New development must ensure that publicly accessible viewing opportunities are maintained. The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development. ~~Site assembly / comprehensive development should be pursued in accordance with Policy GR12 Site Allocations.~~

MM66	Site OA5 pp305-307	**Reasons for Modification**
		Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base
		Site OA5 – Station Road East, Harrow Site Map retained as submitted

Site information	
Address:	368-370 Station Road, Harrow 328-356 Station Road, Harrow Congress House, Lyon Road, Harrow Signal House Lyon Road, Harrow
Area:	0.88 ha

Ref	Chapter /page/policy number	Modification	
		Description	The site is an assembly of multiple adjoining sites located between Station Road, Gayton Road and Lyon Road. Station Road is characterised by a two-storey parade of shops providing a range of retail and other town centre uses. The properties fronting onto Lyon Road are former office blocks, including Signal House and Congress House, and associating surface level car-parking. Pedestrian links present from Lyon Road through onto Station Road to connect to the town centre.
		Current use	Mix of premises including: - Office buildings (Congress House, Signal House) - Retail premises fronting Station Road - Surface level carparking
		Ownership	Private
		PTAL	6a, 6b
		~~Site source~~	~~Call for sites~~
		Relevant planning applications	- Prior approval to convert Congress House to residential use (now lapsed) P/1870/13, P/3134/17/PRIOR, P/0509/20/PRIOR - Outline permission to add seventh floor to Congress House (P/4020/20) - Outline permission to add second and third floors to 342-352 Station Road (P/1111/21) Note these permissions have not been implemented
		Site allocation	
		Site objective	Redevelopment to provide a comprehensive and efficient use of land delivering housing and appropriate town centre uses.
		Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Town Centre uses
		Development timeframe	6 - 10 years
		Indicative Minimum residential capacity	188 ~~171~~ C3 dwelling houses / units or equivalent
		Minimum employment floorspace capacity (GIA)	718sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
		Heritage	Locally Listed Building (14 College Road) Locally Listed Buildings (329, 333, 335, 339, 341, 345, 347 & 351 Station Road) adjoin site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridors (The Grove, Old Redding)
		Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Primary Shopping Area RAF Northolt Safeguarding Zone Tall Building Zone - Part of Site
		Development considerations	

Ref	Chapter /page/policy number	Modification	
		Requirements	Reprovision of appropriate retail floorspace with satisfactory servicing arrangements Improvements to public realm
		Development principles	The site is located within the Harrow Metropolitan Town Centre and Harrow & Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme. It is desirable to bring forward the entire site as one comprehensive development, as this will ensure the most efficient use of land and therefore optimise development. However, it is recognised that if site assembly is not feasible then each site may be delivered piecemeal. Should it be demonstrated that a comprehensive development is not feasible, then each individual site must demonstrate that it would be able to be delivered without prejudicing other components of the overall site allocation. Ground floor uses along Lyon Road must respond to the character of the road and ensure a visually interesting facade onto the public realm. When addressing the Station Road frontage, consideration of both listed and non-listed assets should be undertaken with the retention of such assets prioritised where identified. Planning constraints include protected viewing corridors (set out above), however there is a viewing position directly outside of the development boundary, located on the corner of Gayton and Lyon Roads. This is a rather poor environment to enjoy views to St Mary's Church on Harrow on the Hill, therefore opportunities to improve this location will be sought. The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development.
MM67	Site OA6 pp308-310	**Reasons for Modification**	
		Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Reference to parking standards to add clarity and effectiveness with respect to amended policy M2 of the Local Plan Delivery timeframe updated to ensure effective policy Updated text in relation to NHS floorspace for consistency and clarity, in order to ensure an effective policy.	
		Site OA6 – Greenhill Way Site Map retained as submitted	

Site information	
Address:	South Car Park, Station Road, Harrow 229-245 Station Road, Harrow 269-287 Station Road, Harrow
Area:	1.84 ha
Description	The allocation comprises a number of adjoining sites in Harrow Town Centre, which includes the Council-owned Greenhill Way Carpark, the former Debenhams Site, a public house, and a parade of shops characterised as two and three storey properties.
Current use	Multiple uses including: - Large surface level carpark owned and operated by Council - Former Debenhams

Ref	Chapter /page/policy number	Modification	
			- Retail and public house facing Station Road
		Ownership	Public (Council) - Greenhill Way Carpark Private - Other parcels
		PTAL	6a
		~~Site source~~	~~Call for sites (part of site)~~ ~~Allocation in Harrow & Wealdstone Area Action Plan 2013 (part of site)~~
		Relevant planning applications	N/A
		Site allocation	
		Site objective	Comprehensive redevelopment of the site for a mixture of town centre, community / civic uses and residential uses that reflects the significant opportunity the site represents within Harrow Town Centre.
		Allocated use	**Leading land use** Residential Town centre uses ~~**Supporting land use(s)**~~ NHS Floorspace provision ~~(subject to unmet need / delivery of floorspace on other allocated sites)~~ Community/civic uses (including potential replacement leisure centre from Byron Quarter site) Public House ~~Car parking~~ Public Open Space
		Development timeframe	6 – 10 years (individual sites) ~~10~~ 11 – 15 years (comprehensive development / Site assembly)
		~~Indicative~~ Minimum residential capacity	408 ~~371 C3~~ dwelling houses / units or equivalent
		Minimum non-residential floorspace capacity (GIA)	936sqm
		Planning considerations	
		Flood zone	Critical drainage area
		Heritage	Listed Buildings (Church of St John the Baptist, World War II Memorial, Granada Cinema) opposite site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridor (The Grove)
		Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Primary Shopping Area RAF Northolt Safeguarding Zone Tall Building Zone - Part of Site
		Development considerations	
		Requirements	~~Car parking provision to serve town centre / new development~~ Improved public realm / Open Space provision Community infrastructure (Either replacement leisure centre and / or NHS floorspace) ~~Town centre uses with active frontages~~

Ref	Chapter /page/policy number	Modification	
			Reprovision of public house
		Development principles	The site is located within the Harrow Metropolitan Town Centre and Harrow & Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme. It is desirable to bring forward the entire site as one comprehensive development, as this will ensure the most efficient use of land and therefore optimise development. However, it is recognised that if site assembly is not feasible then each site may be delivered piecemeal. Should it be demonstrated that a comprehensive development is not feasible, then each individual site must demonstrate that it would be able to be delivered without prejudicing other components of the overall site allocation. ~~Central Harrow is identified (within the Harrow Infrastructure Delivery Plan) as having a need for floorspace for the National Health Service, in particular GP floorspace or related use. This site or part of this site must look to deliver floorspace for this use, having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites. The provision of NHS floorspace will be determined on a case-by-case basis on allocated sites across the Harrow & Wealdstone Opportunity Area, and in conjunction with the Harrow Infrastructure Delivery Plan.~~ The site has been identified as being a potential location for new NHS floorspace. Any application must demonstrate engagement with the NHS, and this should include confirmation from the NHS as to whether the physical provision of NHS floorspace is required on the site and the parameters for its provision. Harrow Council Leisure Centre located at Byron Park (Wealdstone) is potentially being replaced as part of the redevelopment of Site Allocation OA14 (Byron Quarter) due to its age and condition. The Council is in the process of confirming which site within the Borough is most feasible and suitable for its replacement. Greenhill Way Carpark provides a potential site for the replacement leisure centre, and therefore flexibility is built into the site allocation in the event that Greenhill Way Carpark is considered feasible and confirmed as the preferred site. Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of town centre parking in accordance with Local Plan Policy M2B. ~~Carparking will continue to be required at a level that is supportive of both any new development and for the Harrow Metropolitan Town Centre. New development will have to demonstrate an appropriate level of carparking.~~ The existing site (particularly the Greenhill Way Carpark) is a poor-quality urban environment and new development will need to improve this relationship. Where the allocation faces onto Station Road, appropriate town uses with active frontages must be provided. When addressing the Station Road frontage, consideration of both designated and non-designated assets should be undertaken with the retention of such heritage assets prioritised where identified. The reprovision of a Public House within the Station Road frontage must be delivered. Comprehensive development of the site should seek to deliver high quality open space available for both future occupiers and the wider town centre. The Harrow & Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development.
MM68	Site OA7 pp311-312	**Reasons for Modification**	
		Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order)	

Ref	Chapter /page/policy number	Modification
		‘Indicative’ housing capacity replaced with ‘Minimum’ housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Reference to London Plan parking standards to add clarity and effectiveness Delivery timeframe updated to ensure effective policy Thames Water requirements added to reflect infrastructure provision to ensure an effective policy.

Site OA7 – Tesco Station Road

Site Map retained as submitted

Site information	
Address:	Tesco Superstore, Station Road Harrow HA1 2TU
Area:	2.28 ha
Description	A large site in private single ownership at the corner of Station Road and Hindes Road, currently occupied by a Tesco superstore and associated surface level carpark. The recently completed Safari cinema re-development adjoins the northeast corner of the site and land to the north and east is mainly in residential use. The site is located at the northern edge of the Harrow Town Centre and roughly halfway between Harrow on the Hill and Harrow and Wealdstone stations.
Current use	Supermarket and surface level carpark
Ownership	Private
PTAL	3-5
~~Site source~~	~~Call for sites~~ ~~Allocation in Harrow & Wealdstone Area Action Plan 2013~~
Relevant planning applications	- Application for phased redevelopment (PL/0693/24) – yet to be determined (November 2024)
Site allocation	
Site objective	Redevelopment of the site for a mixed-use scheme that better utilises this strategic site in the Harrow and Wealdstone Opportunity Area, including reprovision of the existing superstore.
Allocated use	**Leading land use** Supermarket Residential
Development timeframe	~~Phased development in~~ 1-5 years ~~and 6-10 year periods~~
~~Indicative~~ Minimum residential capacity	509 ~~500~~ ~~C3~~ dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	7,130sqm
Planning considerations	
Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
Heritage	Locally Listed Building (Safari Cinema) adjoins site Protected view corridor (Wood Farm protected view)

Ref	Chapter /page/policy number	Modification
		Other: Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Primary Shopping Area RAF Northolt Safeguarding Zone Tall Building Zone - Part of Site
		Development considerations
		Requirements: Re-provide the existing supermarket and sufficient associated parking. Development phased to ensure the supermarket can remain open during development. Improved public domain along Station Road and Hindes Road
		Development principles: This site's location and large size make it a strategic site for development which can deliver a large amount of housing in a mixed-use scheme. Improved frontage to Hindes Road, including the widening of the footway at junction between Hindes Road and Station Road, and the greening of Hindes Road reflecting the importance of the road within the Green Grid. Improve pedestrian access to the site and pedestrian links between the site and Harrow town centre~~,~~ including use of the car park for linked trips. Early engagement with Thames Water should be entered into. Sufficient time is required to undertake network assessment modelling for the development and its impacts on drainage requirements (on and off site) and clarity in relation loading / flow from the development. The site is located within a tall building zone and therefore tall buildings may be appropriate on the site. The arrangements of any tall buildings must respond positively within the site, and tie in appropriately to the lower density and scale residential properties that adjoin the site.
MM69	Site OA8 pp313-314	**Reasons for Modification**
		Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Modifications to include factual update in terms of current use of site and further relevant planning applications (Appeal)
		Site OA8 – Former Royal Mail Postal Delivery Office, Elmgrove Road Site Map retained as submitted
		Site information
		Address: Royal Mail Harrow Postal Delivery Office, Elmgrove Road, Harrow HA1 2ED
		Area: 2.28 ha
		Description: An irregular parcel with access from Elmgrove Road. The site comprises existing single and two storey brick-built buildings, which were previously occupied by the Royal Mail (vacated in 2019). They are currently in commercial / industrial use, and there are also areas of parking on the eastern and southern sides. There are interfaces on several sides to residential uses (generally flats) with multiple sites having been redeveloped or had their use changed to residential. There are some industrial/warehouse uses in operation nearby in an LSIS precinct, but not adjoining the site.
		Current use: ~~Currently in employment use, formerly a sorting office for Royal Mail~~ MOT Centre and Car Showroom

Ref	Chapter /page/policy number	Modification
		Ownership: Private PTAL: 2 ~~Site source~~: ~~Call for sites~~ Relevant planning applications: - Multiple refused applications for residential development on site (P/5049/19 (APP/M5450/W/20/3258864), P/4238/20, P/4527/20) - Permission for change of use from sorting office to B8 and commercial (P/1980/22) **Site allocation** Site objective: Redevelopment to retain and enhance industrial/employment floorspace on the site with potential for co-location with residential on the upper floors Allocated use: **Leading land use** Industrial Residential Development timeframe: 6 - 10 years ~~Indicative~~ Minimum residential capacity: 20 ~~18 C3~~ dwelling houses / units Minimum non-residential floorspace capacity (GIA): 250sqsm **Planning considerations** Flood zone: Critical drainage area Heritage: Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm) Other: Harrow & Wealdstone Opportunity Area RAF Northolt Safeguarding Zone **Development considerations** Requirements: Reprovision of appropriate industrial employment space on the ground floor of development. Development principles: Given this site's location within the Harrow & Wealdstone opportunity area and near the Harrow Town Centre it is suitable for a modest scale residential/industrial co-location development. Non-designated industrial sites make an important contribution to employment and industrial land supply in Harrow and London. Given the former and existing use of this site, industrial floorspace should be provided on the ground floor of any development. Floorspace on the ground floor required for any residential development must be kept to the minimum amount required to facilitate such use, to ensure that a sufficient provision of appropriate employment land is provided on site. Access to the site is constrained. Proposals will need to demonstrate how access to and from the site for industrial use can be provided, and how the impact of this on residential amenity can be mitigated. The irregular shape of the site means that development could impact on the amenity of surrounding properties. This will need to be considered in the design process.
MM70	Site OA9 pp315-317	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base

Ref	Chapter /page/policy number	Modification
		Modification to update allocated uses and factual update of land uses to ensure an effective policy Updated text in relation to NHS floorspace for consistency and clarity, in order to ensure an effective policy. Thames Water requirements added to reflect infrastructure provision to ensure an effective policy.

Site OA9 – Poet's Corner & Milton Road

Site information	
Address:	Civic Centre, Station Road, Harrow
Area:	4.46 ha
Description	Former Council Civic Centre site fronting Station Road and in close proximity to Harrow & Wealdstone Station. There are large carparks on the eastern half of the site and several existing buildings of up to 6 storeys distributed across the site. A former social club fronts part of Station Road. This site is owned by Council and is being promoted for development as part of the Harrow Strategic Development Partnership. Its large size and location make it a highly strategic site with potential to provide a scheme with a range of uses.
Current use	- Currently vacant former civic centre - Surface level carpark (associated with the former civic centre) Community uses
Ownership	Public (Council)
PTAL	4-5
~~Site source~~	~~Allocation in Harrow and Wealdstone Area Action Plan (2013)~~ ~~Harrow Strategic Development Partnership site~~
Relevant planning applications	- Permission for development on small parcel in southern part of site (P/4477/21)
Site allocation	
Site objective	Comprehensive mixed-use site redevelopment creating a permeable new precinct with a high-quality public domain in the heart of the Harrow & Wealdstone Opportunity Area
Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Appropriate town centre uses to serve the development NHS Floorspace provision ~~(having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)~~ Community floorspace Designated Open Space provision
Development timeframe	1 - 5 and 6 - 10 year periods
~~Indicative~~ Minimum residential capacity	1,051 ~~1139 C3~~ dwelling houses / units or equivalent
Minimum non-residential floorspace capacity (GIA)	2,000sqm
Planning considerations	
Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~

Ref	Chapter /page/policy number	Modification	
			Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
		Heritage	Protected Views Setting Corridors (Stanmore Country Park Extension Wood Farm, Roxborough Road Bridge)
		Other	Designated Open Space - part of site Harrow & Wealdstone Opportunity Area Tall Building Zone RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Mix of housing sizes and tenures Pedestrian and cycling route through site linking Station Road to Harrow & Wealdstone Station (western entrance) Shared open space Streetscape and road crossing improvements NHS Floorspace provision ~~(having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)~~
		Development principles	The large size and location of this site make it a highly strategic development site suitable for a scheme containing a range of uses. Development should be planned around a new, generous, and convenient pedestrian and cycling public green route that runs through the site, making an important link between the Station Road and Harrow and Wealdstone Station. Consider retention of the existing mature plane trees and creation of a line of sight between the new public square and the Station. The creation of open space should be available to future occupiers of the site and the wider area. Active ground floor frontages should front the new pedestrian corridor on both sides, forming an extension of the Station Road high street. ~~NHS floorspace should be provided onsite to assist in meeting the need for GP Surgery and other health care floorspace within Central Harrow. The provision of NHS floorspace will be determined on a case-by-case basis on allocated sites across the Harrow & Wealdstone Opportunity Area, and in conjunction with the Harrow Infrastructure Delivery Plan~~ The site has been identified as being a potential location for new NHS floorspace. Any application must demonstrate engagement with the NHS, and this should include confirmation from the NHS as to whether the physical provision of NHS floorspace is required on the site and the parameters for its provision. Development should make the site permeable including new street access layout, and should improve the streetscape environment along the remainder of Station Road A large amount of housing is likely to be provided, making it important that this housing is aligned with local housing need. Provision of a range of housing sizes, types and tenure on the site should be delivered to help foster a mixed & inclusive community. An element of self-build housing could be incorporated into the site but would need to ensure efficient and optimal use of this strategically important site.

Ref	Chapter /page/policy number	Modification
		Early engagement with Thames Water should be entered into. Sufficient time is required to undertake network assessment modelling for the development and its impacts on drainage requirements (on and off site) and clarity in relation loading / flow from the development. The site is located within a tall building zone and therefore tall buildings may be appropriate on the site. The arrangements of any tall buildings must respond positively within the site.
MM71	Site OA10 pp318-319	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Modification to update current use of site Delivery timeframe updated to ensure effective policy Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base

Site OA10 – Wealdstone Probation Office

Site information	
Address:	Harrow Probation Office, Rosslyn Crescent, Harrow HA1 2SU
Area:	0.17 ha
Description	This site ~~is currently~~ was previously used as a ~~Parole~~ Probation office ~~(C2a use).~~ It is to the south-east of the Wealdstone Town Centre (other side of train line) and Harrow & Wealdstone Station. Immediately to the east is a heritage listed former courthouse, now a religious temple. To the north and east are industrial uses, and the area to the south is predominately occupied by terraced housing.
Current use	Vacant~~, former probation office~~
Ownership	Public (Council)
PTAL	5
~~Site source~~	~~Call for sites~~
Relevant planning applications	
Site allocation	
Site objective	Deliver a high-quality mixed-use development to provide hostel accommodation and reprovision of appropriate employment use.
Allocated use	**Leading land use** Hostel accommodation Replacement employment (industrial or related) use
Development timeframe	~~1 - 5~~ 6 – 10 years
~~Indicative~~ Minimum residential capacity	20 ~~70 C2~~ Residential Institutions sui generis units
Minimum non-residential floorspace capacity (GIA)	320sqm
Planning considerations	
Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~

Ref	Chapter /page/policy number	Modification

	The site is at medium risk of surface water flooding, particularly along the south east of the site. Development should be directed away from the south east of the site where these is higher risk of surface water flooding.
Heritage	Listed Buildings (Magistrates Court) adjoins site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm)
Other	Locally Significant Industrial Sites Harrow & Wealdstone Opportunity Area RAF Northolt Safeguarding Zone
Development considerations	
Requirements	Re-provision of appropriate industrial floorspace Delivery of hostel accommodation.
Development principles	A mixed-use scheme is appropriate which provides hostel style accommodation and also the reprovision of employment use that is appropriate for a Locally Strategic Industrial Site. Any form of residential development on the site must address the agent of change, both for the re-provided floorspace on site, but also more specifically in relation to the ongoing successful operation of the adjacent industrial estate. New development must ensure a successful design interface between new residential development and the industrial estate. Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. Reprovision of industrial floorspace must be of a use that is of an appropriate industrial (or related) use and detailed design to ensure future occupiers of the hostel have a high quality of residential amenity.

MM72 — Site OA11 pp320-321

Reasons for Modification

Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order)
'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy.
Provide certainty of non-residential use and quantum to ensure policy is justified and effective
Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base
Reference to London Plan parking standards to add clarity and effectiveness

Site OA11 – Carpark Ellen Webb Drive
Site Map retained as submitted

Site information	
Address:	Car park, Ellen Webb Drive, Wealdstone
Area:	0.32 ha
Description	Narrow semi-oval shaped parcel between Ellen Webb Drive and the railway line in Wealdstone. The site was formerly used as a carpark associated with Harrow & Wealdstone Station. Part of the site is still used, but part is now vacant. This site is located very near Harrow & Wealdstone Station with good connections to Central London and elsewhere, and is within the Wealdstone District Centre, making it suitable for a mixed-use scheme including residential or town centre uses.
Current use	Vacant ~~Partly carpark, partly unused former carpark~~

Ref	Chapter /page/policy number	Modification	
		Ownership	Public
		PTAL	5-6a
		~~Site source~~	~~Call for sites~~ ~~Allocation in Harrow and Wealdstone Area Action Plan (2013) (part)~~
		Relevant applications	
		Site allocation	
		Site objective	Major mixed-use development to provide a residential or hotel led development with appropriate town centre use/s ~~at ground floor~~ and improvements to the public realm.
		Allocated use	**Leading land use** Residential and/or Hotel ~~**Supporting land use(s)**~~ Appropriate town centre uses Reprovision of car parking spaces
		Development timeframe	6 - 10 years
		~~Indicative~~ Minimum residential capacity	201 ~~183 C3~~ dwelling houses / units or equivalent, or 282 ~~C1~~ Hotel rooms
		Minimum non-residential floorspace capacity (GIA)	683sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly in the northwest of the site. The intersection of Ellen Webb Drive and Headstone Drive, is at high risk of surface water flooding. Development should be directed away from the west side of the site where there is higher risk of surface water flooding.
		Heritage	Protected Views Setting Corridor (Roxborough Road Bridge)
		Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Wealdstone) RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	~~Appropriate car parking provision~~ Improvement to public realm, specifically towards Harrow & Wealdstone Station and Wealdstone High Street. Drainage and flood risk improvements, specifically to the western end of the site and within the adjoining public realm.
		Development principles	The site is an irregular and narrow shaped site with some notable constraints that need to be appropriately address in the design and in delivery of any new development. New development must respond to the railway line (Network Rail / London underground and overground) to the rear (south) of the site, and to the public realm linking the site to Wealdstone High Street and the Harrow & Wealdstone Station. ~~Carparking will continue to be required at a level that is supportive of both any new development and for the Wealdstone District Town Centre and Harrow and Wealdstone Station. New development will have to demonstrate an appropriate level of carparking. Carparking on site must~~

Ref	Chapter /page/policy number	Modification
		~~ensure an active frontage onto Ellen Webb Drive is provided, whereby avoiding a blank and inactive frontage~~. Car free development except for disabled person' or operational requirements, in line with London Plan standards. Carparking on site must ensure an active frontage onto Ellen Webb Drive is provided, whereby avoiding a blank and inactive frontage New development must provide public realm improvements. The western part of the site is located within a flood zone, which continues into the public highway further to the west. Improvements on site should be explored to reduce flood risk on site and within the wider area. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. Furthermore, opportunities to improve the cycle and pedestrian environment under the Headstone Drive railway underpass should be delivered. To the east and south east of the site is both Wealdstone High Street and Harrow & Wealdstone Station respectively. Public realm improvements should be delivered to improve the urban environment between the site and both of these destinations. Any form of residential development on site must ensure high quality of residential amenity, specifically addressing impacts from the railway line to the south. The site is appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary's Church on Harrow on the Hill.
MM73	Site OA12 pp322-323	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective. Update to include additional heritage asset as a planning consideration and development principle to improve effectiveness. Reference to parking standards to add clarity and effectiveness with respect to amended policy M2 of the Local Plan Updated text in relation to NHS floorspace for consistency and clarity, in order to ensure an effective policy.

Site OA12 – Peel Road
Site Map retained as submitted

Site information	
Address:	Peel House Car Park, 4 Gladstone Way, Wealdstone International Siddhashram Shakti Centre, 22 Palmerston Road, Harrow
Area:	0.51 ha
Description	A multi-level carpark, place of worship and surface level carpark located on the eastern side of the Wealdstone District Centre. Most of the site is owned by Council, and the site is being brought forward through the Harrow Strategic Development Partnership.
Current use	- Multi-storey carpark - Religious temple - Surface level carpark
Ownership	Public (Council) - Most of site Private - religious temple in the south-eastern portion of site

Ref	Chapter /page/policy number	Modification	
		PTAL	5-6a
		~~Site source~~	~~Harrow Strategic Development Partnership site~~
		Relevant planning applications	
		Site allocation	
		Site objective	Site redevelopment which provides housing and appropriate town centre uses within Wealdstone Town Centre, and which improves connections between the High Street and Byron Park, through the site / along Peel Road.
		Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ ~~Car parking~~ Place of worship Civic or community uses NHS Floorspace provision ~~(having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)~~
		Development timeframe	6 - 10 and 11 - 15 years
		~~Indicative~~ Minimum residential capacity	228 ~~207 C3~~ dwelling houses / units or equivalent
		Minimum non-residential floorspace capacity (GIA)	2,930sqm
		Planning considerations	
		Flood zone	Critical drainage area
		Heritage	Protected Views Setting Corridors (Stanmore Country Park Extension Wood Farm, Roxborough Road Bridge) Byron Recreation Ground
		Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Wealdstone) Primary Shopping Area Tall Building Zone RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Reprovision of place of worship Improved public domain and access-way through site ~~Reprovision of appropriate level of car parking~~ NHS Floorspace provision ~~having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)~~
		Development principles	This site is located in an accessible location within the Wealdstone Town Centre, and is suitable for a mixed use scheme including a substantial level of residential. Car free development except for disabled persons' or operational parking requirements. Any public car parking will need to be justified, taking into account the existing supply of district centre parking in accordance with Local Plan Policy M2B. ~~Carparking will continue to be required at a level that is~~

Ref	Chapter /page/policy number	Modification
		~~supportive of both any new development and for the Wealdstone District Centre. New development will have to demonstrate an appropriate level of carparking.~~ Access to Byron Park from the Wealdstone Town Centre along Peel Road is currently impeded by the existing multi-level carpark. Redevelopment of the site should provide an improved and legible public access route. The other site interfaces should also be improved to improve the overall quality of the public realm and the area generally in this part of the Wealdstone Town Centre. Appropriately designed ground floor frontages must be provided, avoiding any blank and inactive frontages onto the pedestrian footpaths adjacent to the site. ~~NHS floorspace should be provided onsite to assist in meeting the need for GP Surgery and other health care floorspace within the Harrow and Wealdstone Opportunity Area. The provision of NHS floorspace will be determined on a case-by-case basis on allocated sites across the Harrow & Wealdstone Opportunity Area, and in conjunction with the Harrow Infrastructure Delivery Plan.~~ The site has been identified as being a potential location for new NHS floorspace. Any application must demonstrate engagement with the NHS, and this should include confirmation from the NHS as to whether the physical provision of NHS floorspace is required on the site and the parameters for its provision. The site is located within a Tall building zone and any such development should come forward in conformity with the relevant policy and the Harrow & Wealdstone Opportunity Area Tall Building Study (2024).
MM74	Site OA13 pp324-325	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Update to include additional heritage asset as a planning consideration and development principle, to improve effectiveness. Deletion of reference to compulsory purchase to ensure policy is positively prepared.

Site OA13 – Travis Perkins Wealdstone

Site Map retained as submitted

Site information	
Address:	24 - 68 Palmerston Road, Harrow
Area:	0.43 ha
Description	The site includes two adjoining sites that are in industrial use. The site is located in a transitional area, with tall buildings located to the south on the opposite side of Palmerston Road, and low-rise residential to the north and east. George Gange Way forms the western boundary to the site, and separates the site from the Wealdstone Town Centre.
Current use	- Current Travis Perkins builders merchant - An adjacent car yard
Ownership	Private
PTAL	5
~~Site source~~	~~Call for sites (part of site)~~ ~~Allocation in Harrow & Wealdstone Area Action Plan 2013 (part of site)~~

Ref	Chapter /page/policy number	Modification	
		Relevant planning applications	
		Site allocation	
		Site objective	To deliver a mixed-use development that prioritises the reprovision of an appropriate typology and quantum of industrial type floorspace.
		Allocated use	**Leading land use** Industrial (or related) ~~**Supporting land use(s)**~~ Residential
		Development timeframe	6 - 10 years
		~~Indicative~~ Minimum residential capacity	40 ~~36 C3~~ dwelling houses / units or equivalent
		Minimum non-residential floorspace capacity (GIA)	1,649sqm
		Planning considerations	
		Flood zone	Critical drainage area Flood zone 2 - Part of site
		Heritage	Protected Views Setting Corridors (Stanmore Country Park Extension Wood Farm, Roxborough Road Bridge) Byron Recreation Ground
		Other	Locally Significant Industrial Sites Harrow & Wealdstone Opportunity Area Tall Building Zone RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Reprovision of Industrial floorspace Improvement of the pedestrian environment along the frontage towards Wealdstone High Street.
		Development principles	The allocation covers a number of adjoining sites, and in order to deliver an optimised scheme, site assembly will be required. The Council will support site assembly of the properties noted within the allocation~~, and give due consideration to a Compulsory Purchase Order where appropriate.~~ The site is located within a Locally Significant Industrial Site (LSIS) which provides floorspace and premises for industrial land to be carried out within the Borough. Any new development must prioritise the reprovision of appropriate industrial floorspace on site, with any enabling residential element ensuring minimal reduction of the employment offer. The agent of change principle must be applied as part of ensuring high quality residential amenity is provided for future occupiers. Floorspace on the ground floor required for any enabling residential development must be kept to the minimum amount required to facilitate such use, to ensure that a sufficient provision of appropriate employment land is provided on site Improvements to the public realm should be secured, specifically in terms of pedestrian experience towards Wealdstone Town centre. Care must be taken to ensure that new development responds to its context, with particular care to the lower density residential properties in the vicinity of the site.

Ref	Chapter /page/policy number	Modification
		Part of the site is subject to flood risk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. The site is appropriate for some tall building development with consideration to the Harrow & Wealdstone Opportunity Area Tall Building Study (2024) taken when developing proposals for the site.
MM75	Site OA14 pp326-328	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Reference to parking standards to add clarity and effectiveness with respect to amended policy M2 of the Local Plan Update allocated uses to ensure an effective policy Update to include additional heritage asset as a planning consideration and development principle to improve effectiveness. Updated text in relation to NHS floorspace for consistency and clarity, in order to ensure an effective policy. Thames Water requirements added to reflect infrastructure provision to ensure an effective policy

Site OA14 – Byron Quarter

Site Map retained as submitted

Site information	
Address:	Harrow Leisure Centre, Christchurch Avenue, Kenton
Area:	5.74 ha
Description	A large Council-owned site containing a range of leisure and community uses including the Harrow Leisure Centre and carpark, a bowling club, gymnastics centre, skate park and vacant former driving centre. Byron Park open space lies directly to the north. The Belmont Trail forms the southeast boundary and suburban residential is located to the south across Christchurch Avenue.
Current use	Harrow Leisure Centre and carparking Range of other community and leisure uses Former driving centre at eastern end of site now vacant
Ownership	Public (Council)
PTAL	1b - 4
~~Site source~~	~~Allocation in Harrow and Wealdstone Area Action Plan (2013)~~ ~~Harrow Strategic Development Partnership site~~
Relevant planning applications	
Site allocation	
Site objective	Residential-led redevelopment of the site funding renewal or relocation of the Harrow Leisure Centre and improving interfaces with Byron Park.
Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~

Ref	Chapter /page/policy number	Modification	
			Leisure and community uses ~~Car-parking~~ NHS floorspace provision ~~(having regard to identified need at the time and the delivery of floorspace on other allocated sites)~~
		Development timeframe	1 - 5 and 6 - 10 years
		~~Indicative~~ Minimum residential capacity	702 ~~638 C3~~ dwelling houses / units
		Minimum non-residential floorspace capacity (GIA)	12,444sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Part of the site is at risk from surface water flooding. Development should be directed away from this area in line wit the sequential approach.
		Heritage	Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm) Locally Listed Building (Byron Recreation Ground Skateboard Park) Byron Recreation Ground
		Other	Designated Open Space Harrow & Wealdstone Opportunity Area Sites of Importance for Nature Conservation (The Rattler including Belmont Nature Walk) adjoins site Tall Building Zone RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Refurbishment or replacement (on-site or other agreed site) of Leisure Centre ~~Car-parking reprovision.~~ Pedestrian and cycling routes NHS Floorspace provision ~~(having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)~~
		Development principles	This is one of the largest sites within the Harrow and Wealdstone Opportunity Area, making it a strategic site for development. It is suitable for housing, leisure and community uses. Development of the site is likely to be phased, with earlier phases ensuring later phases are not prejudiced. Continuity of leisure use and recreation services should be addressed through development phasing. However, the Council is currently undertaking feasibility studies as to where any replacement leisure facility should be located within the Borough. Flexibility is therefore built into this allocation (along with other potential sites) for this provision. The bowls club and gymnastics centre are in long leases and along with the skate park are important and well-used community assets. They should be retained or site, or provision made for them elsewhere as part of development.

Ref	Chapter /page/policy number	Modification
		Sufficient car parking reprovision should be made within new development to service the Leisure Centre (if retained or re-provided on-site) and other leisure and community uses in accordance with Local Plan Policy M2B. A significant amount of housing is likely to be provided, making it important that this housing is aligned with local housing need. Provision of a range of housing sizes, types and tenures on the site should be delivered to help foster a mixed and balanced community. Development should engage with the edge of Byron Park and provide an improved interface Safe cycle/pedestrian access across new development areas to be created to encourage access/promotion of Belmont Trail/Harrow Green Grid. ~~NHS floorspace should be provided onsite to assist in meeting the need for GP Surgery and other health care floorspace within the Harrow and Wealdstone Opportunity Area. The provision of NHS floorspace will be determined on a case-by-case basis on allocated sites across the Harrow & Wealdstone Opportunity Area, and in conjunction with the Harrow Infrastructure Delivery Plan.~~ The site has been identified as being a potential location for new NHS floorspace. Any application must demonstrate engagement with the NHS, and this should include confirmation from the NHS as to whether the physical provision of NHS floorspace is required on the site and the parameters for its provision. Development should minimise impacts on the Belmont Trail and Wealdstone Cemetery, which are part of a Site of Interest for Nature Conservation and which adjoin this site on its eastern side. Early engagement with Thames Water should be entered into. Sufficient time is required to undertake network assessment modelling for the development and its impacts on drainage requirements (on and off site) and clarity in relation loading / flow from the development. The site is appropriate for some tall building development with consideration to the Harrow & Wealdstone Opportunity Area Tall Building Study (2024) taken when developing proposals for the site.
MM76	Site OA15 pp329-330	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Delivery timeframe updated to ensure effective policy

Site OA15 – Iceland Wealdstone
Site Map retained as submitted

Site information	
Address:	83-85 High Street, Wealdstone
Area:	0.22 ha
Description	Rectangular parcel running from Wealdstone High Street one block west to Wolseley Road, with supermarket fronting High Street and carpark access at the rear onto Wolseley Road.
Current use	Supermarket and surface level carpark

Ref	Chapter /page/policy number	Modification	
		Ownership	Private
		PTAL	5
		~~Site source~~	~~Call for sites~~
		Relevant planning applications	
		Site allocation	
		Site objective	Mixed-use residential and retail development within Wealdstone Town Centre
		Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Retail
		Development timeframe	~~1-5~~ 6 – 10 years
		~~Indicative~~ Minimum residential capacity	28 ~~25 C3~~ dwelling houses / units
		Minimum non-residential floorspace capacity (GIA)	485sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly along the centre of the site. High Street, at the east of the site, is at high risk of surface water flooding. Safe access and egress routes should be directed to the west of the site towards Wolseley Road where there is a lower risk of flooding. Development should be directed away from the central areas of the site where there is high risk of surface water flooding.
		Heritage	Protected Views Setting Corridor (Roxborough Road Bridge)
		Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Wealdstone) Primary Shopping Area RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Reprovision of retail floorspace
		Development principles	This site's location in the Wealdstone Town Centre and Harrow & Wealdstone Opportunity Area make it suitable for a mixed-use development including housing and retail components. New development should ensure a clear separation of uses and ensure that servicing can be provided satisfactorily in close proximity to residential development. Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. Development should not detract from the setting of the adjacent locally listed church While the site is in the Wealdstone Town Centre, Wolseley Road along the western side of the site has a more suburban context which should be respected through development design and massing.

Ref	Chapter /page/policy number	Modification
MM77	Site OA16 – pp331-333	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Update to include additional heritage assets as a planning consideration and development principle to improve effectiveness. Delivery timeframe updated to ensure effective policy

Site OA16 – Kodak

Site Map retained as submitted

Site information	
Address:	Kodak, Headstone Drive, Wealdstone
Area:	15.00 ha
Description	A large site which formerly housed a Kodak Factory and which is now under comprehensive redevelopment to create a mixed-use precinct. The site lies along Harrow View and Headstone Drive to the north-west of Wealdstone Town Centre and the Harrow & Wealdstone Station.
Current use	Former Kodak Factory now large development scheme
Ownership	Private
PTAL	1a - 5
~~Site source~~	~~Allocation in Harrow and Wealdstone Area Action Plan (2013)~~ ~~Call for sites (part of the site, for a potential intensified scheme)~~
Relevant planning applications	The site has an extensive planning history including: - Outline permission granted for whole site (P/2165/15) - Multiple amendments to outline permission (including P/5432/16, P/5023/17, P/4367/17, P/3004/18, P/2143/20, P/4158/22) - Variety of reserved matters, full planning permissions and amendments on individual plots and precincts within site
Site allocation	
Site objective	Comprehensive mixed-use site development which optimises capacity of site while delivering a broad range of necessary infrastructure and land uses.
Allocated use	**Leading land use** Residential – ~~C3~~ Dwelling Houses, ~~C2~~ Residential Institutions (including accommodation for older persons) ~~**Supporting land use(s)**~~ Industrial and employment (B2 general industrial and B8 storage and distribution) NHS floorspace. E-use class (Commercial, Business and Service) of a scale that serves the development and immediate area ~~F1~~ Learning and non-residential institutions class uses, including a primary school Community Centre Green link
Development timeframe	1-5 and 6 – 10 years

Ref	Chapter /page/policy number	Modification	
		~~Indicative~~ Minimum residential capacity	2,388 ~~2407~~ additional ~~C3~~ dwelling houses / units or equivalent (from April 2024, 452 units were delivered before plan period)
		Minimum non-residential floorspace capacity (GIA)	As secured in extant planning permissions
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
		Heritage	Locally Listed Building (Underground Air Ministry Citadel) Protected Views Restricted Corridor (Old Redding) Protected Views Setting Corridor (Old Redding) Scheduled medieval moat Grade I listed Headstone Manor Grade II* listed barn Grade II listed Former Granary at Headstone Manor and outbuilding parallel to barn to south of Headstone Manor.
		Other	Harrow & Wealdstone Opportunity Area Strategic Industrial Location Tall Building Zone RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Intensification of existing phases where appropriate and for phases yet to be built out (where this can be appropriately achieved) Primary School with a minimum three forms of entry NHS Floorspace with the minimum being that previously consented (1,386 sqm) Green link through site, with a minimum area of 23,500 sqm (subject to land requirements for three form entry primary school) Retail floorspace as appropriate to serve convenience retail needs Other town centre / community uses to serve the development and immediately surrounding area Junction improvements where appropriate
		Development principles	Kodak site is a large strategic development site within the borough and has had several planning applications covering the entire site. Whilst some phases have been completed, further phases are still being brought forward. Any opportunity to intensify either existing phases or phases yet to have commenced should address the requirements of existing permissions on the site. Whilst an uplift in residential units may be supported, this will only be where appropriate site requirements (listed above) and any necessary uplift in the quantum of supporting infrastructure and uses is also secured to ensure a mixed and balanced community. NHS floorspace to be provided ~~must be provided onsite to assist in meeting the need for GP Surgeries and other health care floorspace within the Harrow and Wealdstone Opportunity Area. The quantum provided~~ must be at least the minimum floorspace secured under application P/3671/18 and take into account any further intensification of the residential use of the site above that granted permission under the 2015 Outline permission (P/2165/15).

Ref	Chapter /page/policy number	Modification
		The site is appropriate for some tall building development with consideration to the Harrow & Wealdstone Opportunity Area Tall Building Study (2024) taken when developing proposals for the site.
MM78	Site OA17 pp334-335	**Reasons for Modification**
		Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Amendment to industrial land use designation to ensure a justified policy (amendment to designation proposed as per Atlas of Change)
		Site OA17 – Former Kodak Administration Offices Site Map retained as submitted

Site information	
Address:	Administration Building, Kodak, Headstone Drive, Wealdstone
Area:	0.47 ha
Description	The Site sits in the south-west corner of the Eastman Village or Harrow View East Masterplan site (otherwise known as the Kodak Site). It comprises an existing three storey office block with a central courtyard to the west of the site and associated car park comprising of 45 spaces to the east. It was formerly used as the administration office for the Kodak Factory. The promoter indicates the office has been vacant since 2018.
Current use	Vacant, former administration office of Kodak Factory
Ownership	Private
PTAL	3
~~Site source~~	~~Call for sites~~ ~~Allocation in Harrow and Wealdstone Area Action Plan (2013)~~
Relevant planning applications	- Applications have been refused for prior approval conversion from office to residential (P/2991/21/PRIOR, P/2992/21/PRIOR, P/3975/21) - Planning application for mixed-use employment and co-living development (P/1154**2**/24) (not yet determined – November 2024)
Site allocation	
Site objective	Redevelopment to re-provide high quality industrial-related floorspace with the potential for co-location with residential uses on the upper floors.
Allocated use	**Leading land use** Flexible industrial-related floorspace Residential
Development timeframe	1-5 years
~~Indicative~~ Minimum residential capacity	124 ~~120 C3~~ dwelling houses / units or equivalent
Minimum non-residential floorspace capacity (GIA)	625sqm
Planning considerations	

Ref	Chapter /page/policy number	Modification

Flood zone	Critical drainage area
Heritage	Protected Views Setting Corridor (Old Redding)
Other	Harrow & Wealdstone Opportunity Area ~~Strategic Industrial Location~~ Local Significant Industrial Site (LSIS) Tall Building Zone RAF Northolt Safeguarding Zone
Development considerations	
Requirements	Provision of flexible employment or light industrial space
Development principles	The site is designated as ~~Strategic Industrial Land (SIL)~~ Local Significant Industrial Site (LSIS) (as shown on Policies Map) which provides floorspace and premises for industrial land to be carried out within the Borough and forms part of the London reservoir of industrial premises. Any new development must prioritise the reprovision of appropriate industrial floorspace on site, with any enabling residential element ensuring minimal reduction of the employment offer. The agent of change principle must be applied as part of ensuring high quality residential amenity is provided for future occupiers. The site is appropriate for some tall building development with consideration to the Harrow & Wealdstone Opportunity Area Tall Building Study (2024) taken when developing proposals for the site.

MM79 — Site GB1 pp336-337

Reasons for Modification

Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order)
'Indicative' housing capacity deleted as not justified by the evidence base.
Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base
Updated planning consideration to include an additional heritage asset and updated development principles in relation to sustainable transport and historic environment to provide clarity to the policy

Site GB1 – Royal National Orthopaedic Hospital (RNOH)
Site Map retained as submitted

Site information	
Address:	Royal National Orthopaedic Hospital, Brockley Hill, Stanmore
Area:	41.13 ha
Description	The Hospital is a nationally and internationally recognised facility located in the Green Belt at Brockley Hill, Stanmore. The hospital complex is spread over a substantial site area and occupies many outdated, substandard buildings.
Current use	Hospital and associated facilities
Ownership	Public
PTAL	0 - 1a
~~Site source~~	~~Allocation in Site Allocations Local Plan (2013)~~
Relevant planning applications	- Planning permission granted for partial redevelopment of site including new hospital, associated facilities and housing in January 2007 (P/1704/05) - Permission renewed in June 2010 (P/0083/10) - Outline permission granted for a masterplan for a new hospital and up to 347 dwellings together with 19.2ha open space in August 2013 (P/3191/12). Some parts of this scheme relating to the hospital have been implemented, but the overall permission has lapsed.

Ref	Chapter /page/policy number	Modification	
		Site allocation	
		Site objective	Modernisation (including appropriate expansion) of nationally significant hospital and associated facilities ~~supported by residential or ancillary development~~, while not compromising the overall openness of the site.
		Allocated use	**Leading land use** Hospital Research and innovation institutions (connected to the Hospital) Green Belt ~~**Supporting land use(s)**~~ ~~Residential~~
		~~Development timeframe~~	~~Phased development, with residential portion of development in the 11-15 year period.~~
		~~Indicative Minimum residential capacity~~	~~500 347 C3 dwelling houses / units~~
		~~Minimum non-residential floorspace capacity (GIA)~~	
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
		Heritage	Scheduled Ancient Monuments (Brockley Hill Romano-British pottery and settlement) Scheduled Monument and on-designated archaeological remains
		Other	Green Belt Sites of Importance for Nature Conservation (Pear Wood and Stanmore Country Park, Royal Orthopaedic Hospital, Watling Chase planting site and environs) RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Hospital use retained on site. Delivery of modernised hospital and ancillary development to support the successful functioning of the hospital Enhancements to Green Belt
		Development principles	This is a strategic previously developed site in the Green Belt which is suitable for redevelopment within the boundary of the existing developed area, and with potential for some development outside of these boundaries (for example as permitted in previous planning permissions). ~~The desirability of providing new accommodation for the hospital is a significant consideration and may constitute very special circumstances for enabling development that would otherwise be inappropriate development in the Green Belt.~~ The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements including active travel routes and access to public transport to improve connectivity & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan

Ref	Chapter /page/policy number	Modification
		There may also be potential for the development of research and / or innovation facilities associated with the hospital given its national and international stature. Redevelopment should improve the openness of parts of the site not required for development, including through rationalisation of buildings and provision of open space. The site and its surroundings include features of archaeological, biodiversity and heritage importance which must be safeguarded from the impacts of development, and where feasible sought to be enhanced (either through improvement or access). Any planning application will need to be supported by an archaeological desk-based assessment. New development should also have regard to environmental constraints such as surrounding agricultural land, and any potential land contamination by way of historic landfill sites.
MM80	Site GB2 pp338-339	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Updated development principle in relation to historic environment to provide clarity to the policy

Site GB2 – Watling Farm
Site Map retained as submitted

Site information	
Address:	Watling Farm Close, Bushey
Area:	1.06 ha
Description	This site is located on the northern edge of the Borough in the Green Belt and contains gypsies and travellers pitches.
Current use	Gypsy and traveller pitches (two)
Ownership	Public (Council)
PTAL	1a
~~Site source~~	~~Allocation in Site Allocations Local Plan (2013)~~
Relevant planning applications	Planning permission for the use of the site as a gypsy caravan site (with 15 pitches) was first granted in 1974.
Site allocation	
Site objective	Provision of additional gypsy and traveller pitches as required to meet the Borough's identified need
Allocated use	**Leading land use** Gypsy and traveller pitches
Development timeframe	0-5 and 6-10 years, depending on actual demand
~~Indicative~~ Minimum residential capacity	~~12~~ 13 additional pitches
Minimum non-residential floorspace capacity (GIA)	
Planning considerations	
Flood zone	Critical drainage area

Ref	Chapter /page/policy number	Modification
		~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly along the centre of the site. Watling Farm Close, at the centre of the site, is at high risk of surface water flooding. Watling Farm Close is at high risk of surface water flooding and is the only direct route out of the Farm. A safe 'haven' should be provided to the southeast of the site, where flood risk is not predicted.
		Heritage
		Green Belt ~~Areas Of Special Character~~ Sites of Importance for Nature Conservation (Royal Orthopaedic Hospital, Watling Chase planting site and environs) RAF Northolt Safeguarding Zone
		Development considerations
		Requirements: Delivery of Gypsy and traveller pitches
		Development principles: Part of the site is subject to flood risk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. Development shall conserve or enhance the significance of the Locally Grade II Listed Watling Farm.
MM81	Site O1 – pp340-341	**Reasons for Modification**
		Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Updated allocated uses to ensure an effective policy Reference to London Plan parking standards to add clarity and effectiveness Updated text in relation to NHS floorspace for consistency and clarity, in order to ensure an effective policy.
		Site O1 – Waitrose South Harrow Site Map retained as submitted

Site information	
Address:	140 Northolt Road, South Harrow
Area:	1.57 ha
Description	The site contains a Waitrose Supermarket. It is located within a former retail park, the north-west corner of which is under redevelopment for residential use. The site is bounded by the Brember Road Industrial Park (West), the Grange Farm Estate (north) with employment uses along Northolt Road to the East and residential to the south. Surface level car parking serves the existing Waitrose Supermarket.
Current use	Supermarket and surface level carpark
Ownership	Private
PTAL	3
~~Site source~~	~~Council site search~~
Relevant planning applications	- Planning permission for redevelopment of adjacent site within retail park (P/2052/20)

Ref	Chapter /page/policy number	Modification	
		Site allocation	
		Site objective	Redevelopment to provide the reprovision of supermarket with residential development.
		Allocated use	**Leading land use** Supermarket ~~**Supporting land use(s)**~~ Residential development NHS Floorspace provision Open Space
		Development timeframe	11-15 years
		~~Indicative~~ Minimum residential capacity	136 ~~124 C3~~ dwelling houses / units
		Minimum non-residential floorspace capacity (GIA)	3,040sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly along the south east of the site. Development should be directed away from the southern area of the site where there is a higher risk of surface water flooding. Safe access and egress routes should be directed to the southeast corner of the site towards Northolt Road where there is a lower risk of flooding. Development should be directed away from the southern area of the site where there is a higher risk of surface water flooding.
		Heritage	
		Other	RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Reprovision of supermarket Appropriate level of replacement carparking Residential development NHS floorspace provision ~~Open Space~~
		Development principles	Any new development within the Waitrose site must respond positively to the implemented scheme on the remainder of the former retail park and the adjacent Grange Farm Estate re-development. An appropriate level of carparking in line with London Plan standards ~~must be provided to continue~~ to serve the Waitrose superstore~~ and also for any residential development~~. The allocation seeks to re-provide a supermarket on site rather than specifying retail, given the out of centre location and servicing requirements for such a use. Located adjacent (west) to the Waitrose supermarket is a designated industrial estate (Brember Road Estate) therefore any residential development must apply the Agent of Change principle. Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.

Ref	Chapter /page/policy number	Modification
		The site may offer the opportunity to make provision of publicly accessible open space ~~to assist in addressing the identified open space deficiency in the south of the Borough.~~ ~~Where there is an evidential need, NHS floorspace will be secured to cater for future population growth within the area over the plan period.~~ The site has been identified as being a potential location for new NHS floorspace. Any application must demonstrate engagement with the NHS, and this should include confirmation from the NHS as to whether the physical provision of NHS floorspace is required on the site and the parameters for its provision. The site is located in a predominately residential area and any new development should be progressed following the guidance set out in the Tall Building (Building Height) SPD.
MM82	Site O2 pp342-343	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated allocated use and principle to ensure an effective policy Updated text in relation to NHS floorspace for consistency and clarity, in order to ensure an effective policy.

Site O2 – Roxeth Library & Clinic
Site Map retained as submitted

Site information	
Address:	Northolt Road Clinic, 322 Northolt Road, South Harrow Roxeth Library, Northolt Road, South Harrow
Area:	0.13 ha
Description	This site includes the Roxeth Library and Clinic on Northolt Road within the South Harrow District Centre
Current use	- Library - Healthcare clinic
Ownership	Public
PTAL	5
~~Site source~~	~~Allocation in Site Allocations Local Plan (2013)~~
Relevant planning applications	
Site allocation	
Site objective	Mixed use development which improves the utilisation of this currently low-density town-centre site
Allocated use	**Leading land use** Community uses Town centre uses NHS Floorspace provision

Ref	Chapter /page/policy number	Modification

	~~**Supporting land use(s)**~~ Residential
Development timeframe	11-15 years
~~Indicative~~ Minimum residential capacity	17 ~~15 C3~~ dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	700sqm
Planning considerations	
Flood zone	Critical drainage area
Heritage	
Other	Town Centre Boundaries (South Harrow) Primary Shopping Area RAF Northolt Safeguarding Zone
Development considerations	
Requirements	Replacement library **Replacement** NHS Floorspace
Development principles	This site is suitable for a mixed-use scheme comprising retail or other town centre uses, replacement or retention of existing community uses (the Roxeth Library and NHS Clinic) and supporting residential development on the upper levels. ~~Additional NHS floorspace may be required where evidenced.~~ The site has been identified as being a potential location for additional NHS floorspace. Any application must demonstrate engagement with the NHS, and this should include confirmation from the NHS as to whether additional NHS floorspace is required on the site and the parameters for its provision.

Ref	Chapter /page/policy number	Modification
MM83	Site O3 pp344-345	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Updated allocated uses to ensure an effective policy Modification to development principles to refer to designated open space to make the policy effective.

Site O3 – Northolt Road Nursery and Carpark at rear of 27 Northolt Road
Site Map retained as submitted

Site information	
Address:	2 Grange Road, South Harrow Rear of 27 Northolt Road, South Harrow
Area:	0.30 ha
Description	Two Council-owned parcels in South Harrow: A single-storey nursery on the corner with Grange Road and a nearby carpark located behind buildings on Northolt Road.
Current use	Current council nursery and carpark
Ownership	Public (Council)

Ref	Chapter /page/policy number	Modification	
		PTAL	4
		~~Site source~~	~~Call for sites~~
		Relevant planning applications	
		Site allocation	
		Site objective	Residential-led redevelopment of under-utilised Council-owned sites in South Harrow
		Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Nursery Offices **Designated Open Space**
		Development timeframe	6 - 10 years
		~~Indicative~~ Minimum residential capacity	41 ~~37 C3~~ dwelling houses / units
		Minimum non-residential floorspace capacity (GIA)	950sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Both sites are at high risk of surface water flooding, particularly along the west of the sites. The Car park is at greater risk than the Children Centre. Northolt road, to the west of both the sites, is at high risk of surface water flooding. Car Park – safe access and egress routes should be directed to the northeast of the site towards Brigade Close where there is a lower risk of flooding. Children's Centre – Safe access and egress routes should be directed to the east of the site towards Grange Road where there is a lower risk of flooding. Development should be directed away from the northwest side of both sites where there is a higher risk of surface water flooding.
		Heritage	
		Other	Designated Open Space - part of site ~~Areas of Special Character adjoins site~~ RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Reprovision of nursery on-site or relocation to an appropriate alternative site ~~Provision of appropriate level of car parking~~
		Development principles	These sites are close to the South Harrow station and District Centre, and are suitable for residential-led development ~~Development of the car-park should be accompanied by an assessment of parking need which demonstrates that an appropriate level of parking is being retained, re-provided on site or relocated.~~ Part of the existing sites have designated open space within them, any development shall ensure reprovision in line with Policy GI2 (Open Space).

Ref	Chapter /page/policy number	Modification
		Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.
MM84	Site O4 pp346-347	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Updated allocated uses to ensure an effective policy Clarification added with respect to open space to ensure allocation is effective.

Site O4 – Grange Farm
Site Map retained as submitted

Site information	
Address:	Grange Farm Crescent, Harrow
Area:	4.08 ha
Description	Consists of the Grange Farm Estate, a Council housing estate in South Harrow situated behind buildings on Northolt Road, with access from Northolt Road, Shaftesbury Avenue and Wesley Close. This estate is under redevelopment with the first phase (adjoining Shaftesbury Avenue) complete. There are interfaces with suburban back gardens to the north and west and with a retail park (with permission for mixed use redevelopment) to the south.
Current use	Council housing estate
Ownership	Public (Council)
PTAL	2 - 3
~~Site source~~	~~Council estate regeneration project~~
Relevant planning applications	- P/3524/16 (Hybrid Application) for estate redevelopment
Site allocation	
Site objective	Regeneration of the remainder of the Grange Farm Estate
Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Community hub Designated o~~O~~pen space
Development timeframe	1-5 and 6-10 years
~~Indicative~~ Minimum residential capacity	292 ~~300 C3~~ dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	
Planning considerations	
Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~

Ref	Chapter /page/policy number	Modification

	Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
Heritage	Locally Listed Building (Royal British Legion Club) adjoins site
Other	Designated Open Space - part of site RAF Northolt Safeguarding Zone
Development considerations	
Requirements	Residential Community floorspace Designated Open Space
Development principles	The Council granted hybrid planning permission under P/3524/16, of which Phase 1 has been implemented. Phases two and three should be delivered in general conformity with the masterplan / design code for the wider site or through a revised planning application which would continue to deliver against the allocation requirements.

MM85 | Site O5 pp348-350

Reasons for Modification

Deletion of text not necessary to meet the test of soundness (Site source)
Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base
Updated site objective to improve flexibility.

Site O5 – Harrow School Estate & John Lyon School
Site Map retained as submitted

Site information	
Address:	
Area:	11.28 ha
Description	The estates of the Harrow School and John Lyon School occupy a substantial part of Harrow on the Hill and comprises many heritage assets, sites of biodiversity importance, trees masses and a substantial tract of Metropolitan Open Land all of which are important attributes which make up the area's special character.
Current use	Residential school buildings, sports facilities and playing fields
Ownership	Private
PTAL	Varies across site
~~Site source~~	~~Allocation in Site Allocations Local Plan (2013)~~
Relevant planning applications	P/1940/16
Site allocation	
Site objective	Facilitate the continued improvement, maintenance and use of assets within the school estates, and development and change within the estate to strengthen the educational roles of the Harrow School and John Lyon School.
Allocated use	**Leading land use** Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields and other development which will support the ongoing operation and/or evolution/improvement of Harrow School or John Lyon School.

Ref	Chapter /page/policy number	Modification	
		Development timeframe	Throughout plan period
		~~Indicative~~ **Minimum** residential capacity	N/A
		Minimum non-residential floorspace capacity (GIA)	
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
		Heritage	Archaeological Priority Areas, Locally Listed Buildings (Multiple contained on site) Listed Buildings (Multiple contained on site) Conservation Areas (Harrow Park Conservation Area, Harrow School Conservation Area Harrow on the Hill, Harrow on the Hill Village Conservation Area, Roxborough Park and The Grove Conservation Area) Protected Views Restricted Corridors (Capital Ring Capital Ring, Football Lane, West Harrow Recreation Ground) Protected Views Setting Corridors (Capital Ring Capital Ring, Football Lane, Football Lane, Old Redding, Stanmore Country Park Extension Wood Farm, Roxborough Road Bridge, West Harrow Recreation Ground) Registered Parks and Gardens - part of site
		Other	Metropolitan Open Land - part of site ~~Areas Of Special Character~~ Sites of Importance for Nature Conservation (Harrow on the Hill) - part of site RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Maintain the School's reputation as a world class centre of education. Improve security, creating convenient and safe access to, across and throughout the school. To deliver an improved physical environment – by conserving and enhancing the historic and natural environments, including Metropolitan Open Land openness, sensitive landscaping, reinstating viewing corridors and creating first-class new buildings, facilities and spaces Achieve community integration
		Development principles	Harrow on the Hill, St Mary's Church and many features of the Harrow School and John Lyon School estates are important features of Harrow's townscape and landscape. As owners and occupiers the schools plays a vital role in maintaining these assets and funding their improvement. The School institution is itself an important local asset. The Harrow School Supplementary Planning Document sets out an agreed masterplan for development and change within the School Estate. The Council will support proposals for redevelopment that form part of an agreed masterplan to maintain or enhance the openness of Metropolitan Open Land and which secure community access to land and facilities. The Council will resist any alteration to the boundaries of MOL and will give the same level of protection to MOL as to the Green Belt, consistent with London Plan.

Ref	Chapter /page/policy number	Modification
		Proposals must also conserve or enhance heritage consistent with the Council's supplementary planning documents, together with the supporting character appraisals and management strategies of conservation areas. Development should comply with relevant development management policies for the protection of the natural environment and local views ~~and the Harrow on the Hill Area of Special Character~~ Proposals must have regard to the public rights of way, ensuring that these do not become obstructed and that the quality of the experience enjoyed by walkers is not diminished. Proposals requiring rerouting of public rights of way will not be permitted if this would lead to substantial diversions at odds with pedestrian desire lines through the land.
MM86	Site O6 pp351-352	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base

Site O6 – Brethrens' Meeting Hall, The Ridgeway
Site Map retained as submitted

Site information	
Address:	Pavilion, The Ridgeway, North Harrow
Area:	1.39 ha
Description	A triangular parcel of land located between The Ridgeway, allotments and a London Underground Line. The site was formerly used as a place of worship and contains a single low rise building and associated surface level carparking. It has recently been acquired by Council for the purpose of delivering a new school.
Current use	Religious meeting hall
Ownership	Public
PTAL	1b - 2
~~Site source~~	~~Planned new infrastructure~~
Relevant planning applications	Application for mixed-use scheme refused (P/1492/20)
Site allocation	
Site objective	Provision of a new school for Children with special educational needs and disabilities (SEND) to meet identified need.
Allocated use	**Leading land use** School ~~**Supporting land use(s)**~~ Uses on remaining part of site as appropriate
Development timeframe	1-5 years
~~Indicative~~ Minimum residential capacity	N/A
Minimum non-residential floorspace capacity (GIA)	
Planning considerations	
Flood zone	Critical drainage area

Ref	Chapter /page/policy number	Modification	
			~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly along the southwest boundary / west side of the site. Safe access and egress routes should be directed towards The Ridgeway where there is a lower risk of flooding and road access. Development should be directed away from the south corner of the site where there is higher risk of surface water flooding.
		Heritage	
		Other	Sites of Importance for Nature Conservation (Old Tennis Court, West Harrow Recreation Ground and The Ridgeway Embankment) adjoins site RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Pedestrian access through site to West Harrow Station Deliver a school for Children with special educational needs and disabilities (SEND)
		Development principles	There is an existing path from The Ridgeway to the West Harrow Station along a right of way through the adjoining allotments. This path should be extended through the site to provide a more direct access route when any development occurs. Development should not impact on the amenity or function of the adjoining allotments. As the site is adjacent to London Underground infrastructure, early consultation with Transport for London's infrastructure protection team will be required. Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.
MM87	Site O7 pp353-355	**Reasons for Modification**	
		Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Reference to London Plan parking standards to add clarity and effectiveness. Updated allocated uses to ensure an effective policy Clarification of site requirements with respect to step free access for flexibility / effectiveness and consistency with CIL Regulations.	
		Site O7 – Rayners Lane Station Carpark Site Map to be amended in line with TfL representation to remove the retail units facing Alexandra Avenue as not a justified approach to included these units.	

Ref	Chapter /page/policy number	Modification

Map 1: Regulation 19 Consultation Version

Map 2: Post Examination in Public; Revised site plan

Site information	
Address:	Rayners Lane Station Car Park, High Worple, Rayners Lane
Area:	0.85 ha
Description	This site comprises the carpark for Rayners Lane Station ~~and adjacent shops which front Alexandra Avenue.~~ The existing carpark is a long rectangular site situated between rear gardens of houses on High Worple and the railway line. It is located on the boundary of the Rayners Lane District Centre.
Current use	- Surface level carpark - Retail facing Alexandra Avenue
Ownership	Public
PTAL	4 - 5
~~Site source~~	~~Call for sites~~ ~~Allocation in Harrow Site Allocations Local Plan (2013)~~
Relevant planning applications	- Application for residential accommodation withdrawn (P/1448/20)
Site allocation	
Site objective	Mixed-use development which improves access to Rayners Lane Station~~, while retaining or re-providing a sufficient level of car parking~~
Allocated use	**Leading land use** Residential ~~Car parking~~ ~~**Supporting land use(s)**~~ Town centre uses (eastern part of site only)
Development timeframe	6-10 years
~~Indicative~~ Minimum residential capacity	76 ~~69 C3~~ dwelling houses / units

Ref	Chapter /page/policy number	Modification	
		Minimum non-residential floorspace capacity (GIA)	
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach.
		Heritage	Conservation Areas (Rayners Lane) Locally Listed Buildings (466, 470 & 472 Rayners Lane) opposite site Listed Building (Rayner's Lane London Regional Transport Underground Station) adjoins site
		Other	Town Centre Boundaries (Rayners Lane) Primary Shopping Area Sites of Importance for Nature Conservation (Rayners Lane Railside Lands) adjoins site RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Deliver high quality residential development Re-provision of an appropriate level of station car-parking for disabled persons ~~to help meet need generated by commuters~~ ~~Provide step-free access to Rayners Lane Station~~ Contribute towards the provision of step-free access to Rayners Lane Station commensurate to the quantum of development.
		Development principles	As it contains a large surface level carpark immediately adjacent to Rayners Lane Station, this site has significant potential for residential development in an accessible location. ~~Town centre uses should be confined to the portion of the site fronting Alexandra Avenue/Rayners Lane, which currently contains single-storey retail premises. Active frontages should be provided here.~~ ~~Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.~~ The design and layout of any proposals must be sensitive to the heritage of Rayners Lane, in particular the neighbouring listed station building which should remain the prominent visual feature in the approach from Imperial Drive and Alexandra Avenue. The area to the west of the site forms a Site of Importance for Nature Conservation. The design and layout of development on the site must be sensitive to the nature conservation site and to setting of the adjacent listed station building and to the Rayners Lane conservation area. Proposals must be designed to minimise where possible impacts on the amenity of neighbouring occupiers in High Worple. The site lies directly on a secondary aquifer, the groundwater in which may be in hydraulic conductivity with the chalk principal aquifer. Therefore any planning application for this site must include a preliminary risk assessment to assess if land contamination may be present at the site. This should be submitted with the planning application. The assessment needs to include:

Ref	Chapter /page/policy number	Modification
		• Information on past and current uses, • If sensitive controlled waters receptors are present, and • If the site could pose a pollution risk, including should contamination be present • If any aspects of the proposed development could pose a pollution risk should contamination be present Further work such as an intrusive site investigation may be required. As the site is adjacent to London Underground infrastructure, early consultation with Transport for London's infrastructure protection team will be required.
MM88	Site O8 pp356-357	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base

Site O8 – Harrow West Conservative Association

Site Map retained as submitted

Site information	
Address:	10 Village Way, Rayners Lane, Pinner
Area:	0.16 ha
Description	The site is located on the edge of the Rayners Lane District Town Centre and contains a two-storey property with surface level carparking to the rear. To the east of the site the Rayners Lane Town Centre which is made of two storey parades with employment on the ground floor. The remainder of the site is surrounded by two-storey residential properties.
Current use	Harrow West Conservative Association
Ownership	Private
PTAL	4
~~Site source~~	~~Call for sites~~ ~~Allocation in Harrow Site Allocations Local Plan (2013)~~
Relevant planning applications	
Site allocation	
Site objective	Mixed-use development of edge-of-centre site.
Allocated use	**Leading land use** Community or employment space Residential
Development timeframe	6-10 years
~~Indicative~~ Minimum residential capacity	14 ~~13 C3~~ dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	370sqm
Planning considerations	

Ref	Chapter /page/policy number	Modification

Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly along the west and north of the site. Safe access and egress routes should be directed to the south of the site towards Village Way where there is a lower risk of flooding. Development should be directed away from the north and west of the site where this a higher risk of surface water flooding.
Heritage	
Other	RAF Northolt Safeguarding Zone
Development considerations	
Requirements	Reprovision of existing employment floorspace, or replacement with community floorspace
Development principles	Development would need to address flood risk issues associated with the Smarts Brook arm of the Yeading Brook. The whole of the site is within Flood Zone 3a and it is therefore unsuitable for residential development unless a site specific flood risk assessment demonstrates that the exception test can be passed. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. Being at the edge of the district centre, the site forms a transition between the more commercial character of the centre and the surrounding suburban housing. Particular care will therefore be needed to manage impacts upon neighbouring dwellings and to ensure that the surrounding residential environment is safeguarded.

MM89 — Site O9, pp358-359

Reasons for Modification

Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order)
'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy.
Provide certainty of non-residential use and quantum to ensure policy is justified and effective
Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base
Delivery timeframe updated to ensure effective policy
Updated development principles in relation to environmental improvements and designated open space to provide clarity and an effective policy

Site O9 – Pinner Telephone Exchange

Site information	
Address:	Pinner Telephone Exchange, Exchange Walk, Pinner
Area:	0.51 ha
Description	The site is a Telephone exchange building fronts onto Cannon Lane (no direct access) and is accessed off Village Way via Exchange Walk. The rear of the site (accessed off Exchange Walk) is a large surface car park. To the south of the site is a two to three story flatted development that is adjacent to London Underground Line. To the north and east of the site is suburban two storey properties. The Yeading Brook lies immediately to the east of the site, with allotments located beyond it.
Current use	Telephone exchange
Ownership	Private
PTAL	1b - 2
~~Site source~~	~~Call for sites~~

Ref	Chapter /page/policy number	Modification	
		Relevant planning applications	
		Site allocation	
		Site objective	Residential redevelopment of the site when no longer required as a telephone exchange.
		Allocated use	**Leading land use** Residential
		Development timeframe	~~10-15~~ 6 – 10 years
		~~Indicative~~ Minimum residential capacity	48 ~~44 C3~~ dwelling houses / units
		Minimum non-residential floorspace capacity (GIA)	
		Planning considerations	
		Flood zone	Flood zone 2 - Part of site ~~Flood zone (Surface Water) 3a - Part of site~~ Flood zone (Fluvial and Tidal) 3a - Part of site Flood zone (Fluvial and Tidal) 3b - Part of site The site is at high risk of surface water flooding, particularly along the east of the site. The site is at risk from fluvial flooding from Yeading Brook, especially on its eastern part. Site access and egress routes will be directed to the west of the site towards Cannon Lane where there is we a lower risk of fluvial flooding. Development should be directed away from the eastern areas of the site where there is higher risk of surface water flooding.
		Heritage	
		Other	Designated Open Space - part of site Green Chains and Corridors - part of site Sites of Importance for Nature Conservation (Yeading Brook) - part of site Group Tree Preservation Order (Front of site) RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Environmental Improvements to Yeading Brook, the Green Corridor and Site of Importance to Nature Conservation (SINC), including measures that support the Crane Valley Partnership Smarter Water Catchment Plan, and the Yeading Brook Unbound Project. Reprovision of Designated Open Space
		Development principles	The eastern part of the site adjoins the Yeading Brook, which is a site of importance for nature conservation and within a Green Chain and Corridor. Design and layout of development must be sensitive to these ~~Brook~~ designations and through consultation with the Local Planning Authority, seek to improve both the quality of, and access to them. ~~and minimise impacts on it~~ The existing site has designated open space within it, any development shall ensure reprovision in line with Policy GI2 (Open Space). The eastern part of the site along what is currently the only access-route is flood-prone. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.

Ref	Chapter /page/policy number	Modification
		The design of development should respond to the existing flatted housing to the south and suburban housing to the north.
MM90	Site O10 pp360-361	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Updated development consideration to provide clarity
		Site O10 – Harrow View Telephone Exchange Site Map retained as submitted

Site information	
Address:	Harrow Telephone Exchange, 54 Harrow View, Harrow
Area:	0.28 ha
Description	A telephone exchange surrounded by 2-storey and some 3-storey suburban housing of a range of types including flatted development, terraced, semi-detached and detached dwellings.
Current use	Telephone exchange
Ownership	Private
PTAL	1b
~~Site source~~	~~Call for sites~~
Relevant planning applications	
Site allocation	
Site objective	Residential led redevelopment of the site when no longer required as a telephone exchange
Allocated use	**Leading land use** Residential
Development timeframe	6 - 10 years
~~Indicative~~ Minimum residential capacity	30 ~~27 C3~~ dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	
Planning considerations	
Flood zone	Critical drainage area
Heritage	Protected Views Restricted Corridor (Harrow View), Protected Views Setting Corridor (Old Redding)
Other	RAF Northolt Safeguarding Zone
Development considerations	
Requirements	Retain streetscape green~~ery~~ space between existing building and Harrow View
Development principles	This site is suitable for redevelopment for residential purposes when obsolete as a telephone exchange.

Ref	Chapter /page/policy number	Modification
		The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan. Development should be sensitive the surrounding suburban context.
MM91	Site O11 pp362-363	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base

Site O11 – North Harrow Methodist Church

Site information	
Address:	North Harrow Methodist Church, Pinner Road, North Harrow
Area:	0.34 ha
Description	The site is currently occupied by the North Harrow Methodist Church and comprises a church, church halls, ancillary facilities and scouts' premises. It is on the northern edge of the North Harrow District Centre.
Current use	Church, associated hall and Scout Hall
Ownership	Private
PTAL	3
~~Site source~~	~~Allocation in Harrow Site Allocations Local Plan (2013)~~
Relevant planning applications	
Site allocation	
Site objective	Enabling mixed-use development facilitating replacement or enhancement of existing church and community facilities
Allocated use	**Leading land use** Church and community facilities ~~**Supporting land use(s)**~~ Residential Limited level of town centre uses appropriate for an edge of centre location
Development timeframe	11-15 years
~~Indicative~~ Minimum residential capacity	36 ~~15-33 C3~~ dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	860sqm
Planning considerations	
Flood zone	~~Flood zone (Surface Water) 3a - Part of site~~ The site is at moderate risk of surface water flooding, particularly in the south of the site.
Heritage	
Other	RAF Northolt Safeguarding Zone
Development considerations	

Ref	Chapter /page/policy number	Modification
		Requirements: Retention or replacement of an appropriate amount of church and community use floorspace Development principles: Comprehensive or partial redevelopment of this site must be led by the need to secure the re-provision or retention of the church hall and other facilities. To this end an enabling mixed-use scheme comprising residential and/or retail uses would be suitable. The church, hall and other facilities are actively used both by the church members and by other local groups and are a vital part of the social infrastructure of the North Harrow community. There should be no loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities. In retail policy terms, the site is located outside of the North Harrow district centre boundary but is within 300m of the centre's secondary shopping frontage, and the site should therefore be treated as being 'edge of centre'. It is suitable for redevelopment to multiple small retail units, or for a single convenience goods retailer such as a discount food outlet. Being at the edge of the district centre, the site forms a transition between the more commercial character of the centre and the surrounding suburban housing. Particular care will therefore be needed to manage impacts upon neighbouring dwellings and to ensure that the surrounding residential environment is safeguarded. Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.
MM92	Site O12 pp364-365	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Reference to London Plan parking standards to add clarity and effectiveness.

Site O12 – Hatch End Telephone Exchange
Site Map retained as submitted

Site information	
Address:	Telephone Exchange, 356 Uxbridge Road, Hatch End
Area:	0.38 ha
Description	A telephone exchange within the Hatch End Local Centre. The site includes a narrow frontage to Uxbridge Road with two-storey fenestration but height commensurate with the three storey properties on either side. To the rear of the site the telephone exchange extends over a public car park.
Current use	Telephone exchange
Ownership	Public (Council) - Part of site Private - Part of site
PTAL	2
~~Site source~~	~~Call for sites~~
Relevant planning applications	

Ref	Chapter /page/policy number	Modification

Site allocation	
Site objective	Residential led redevelopment of the site when no longer required as a telephone exchange
Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Appropriate Town centre use (within designated shopping frontage)
Development timeframe	6 - 10 years
~~Indicative~~ Minimum residential capacity	48 ~~44 C3~~ dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	200sqm
Planning considerations	
Flood zone	Critical drainage area
Heritage	
Other	Town Centre Boundaries (Hatch End) RAF Northolt Safeguarding Zone
Development considerations	
Requirements	Retention of frontage Appropriate provision of car-parking Contribution to public realm
Development principles	An opportunity exists to demolish and rebuild the rear element, however development should retain the front element facing onto Uxbridge Road which forms an attractive part of the streetscape. There may be an opportunity for upwards extension if this is done sensitively in relation to the frontage of the building and the surrounding urban fabric. An appropriate town centre use should be provided to activate the frontage to Uxbridge Road, and to respond to the position of the site within the Hatch End Local Centre. ~~An appropriate level of car-parking should be retained, reprovided on site or relocated as part of development in order to meet the need generated by development as well as for the broader town centre.~~ Carparking reprovision should be in accordance with London Plan standards. Appropriate access should continue to be provided to the nursery and community use adjoining the site to the north-west, which are currently accessed through the on-site carpark.

Ref	Chapter /page/policy number	Modification
MM93	Site O13 pp366-367	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) Reference to parking standards to add clarity and effectiveness with respect to amended policy M2 of the Local Plan

Site O13 – Harrow Arts Centre
Site Map retained as submitted

Site information	
Address:	Harrow Arts Centre, 171 Uxbridge Road, Hatch End

Ref	Chapter /page/policy number	Modification	
		Area:	0.73 ha
		Description	The site comprises the car park serving Harrow Arts Centre together with a complex of ancillary buildings.
		Current use	Arts centre buildings
		Ownership	Public (Council)
		PTAL	2
		~~Site source~~	~~Allocation in Harrow Site Allocations Local Plan (2013)~~
		Relevant planning applications	- Permissions relating to earlier phases of redevelopment (P/3496/19, P/3594/20, P/2525/22, P/1099/23)
		Site allocation	
		Site objective	Expansion and modernisation of arts centre and ancillary buildings
		Allocated use	**Leading land use** Arts centre and associated uses
		Development timeframe	0-5 and 6-10 years
		~~Indicative~~ **Minimum** residential capacity	N/A
		Minimum non-residential floorspace capacity (GIA)	
		Planning considerations	
		Flood zone	Critical drainage area
		Heritage	Locally Listed Buildings (151, 157 & 169 Uxbridge Road) form part of the wider site Listed Building (BG Elliot Hall to Harrow College of Further Education) form part of the wider site
		Other	Sites of Importance for Nature Conservation (Harrow Arts Centre) RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	
		Development principles	Harrow Arts Centre is undergoing a major programme of renewal, with a masterplan and phase one and two works complete. The Arts Centre is a key part of Harrow's cultural strategy. The site is suitable for further works that complement the existing arts and broader community offer or provide replacement facilities ~~if appropriate~~. Development should maintain an appropriate quantum of car parking and preserve or enhance the setting of Elliot Hall, together with other listed buildings. Development should also have regard to ~~securing an appropriate built context for the adjoining green belt, and to~~ minimising impacts on the site of importance for nature conservation.
MM94	Site O14 pp368-369	**Reasons for Modification**	
		Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Delivery timeframe updated to ensure effective policy Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Reference to travel plan requirement to ensure an effective policy	
		Site O14 – Vernon Lodge	

Ref	Chapter /page/policy number	Modification
		Site Map retained as submitted

Site information	
Address:	Vernon Lodge, 654 Kenton Lane, Harrow Weald
Area:	0.36 ha
Description	The site contains a purpose-built two-storey temporary housing development owned by Harrow Council. The surrounding area is generally suburban, with a mix of housing typologies, a public house, neighbourhood parade and allotment gardens.
Current use	Vacant former hostel accommodation
Ownership	Council / Private (subject to sale)
PTAL	1b
~~Site source~~	~~Call for sites~~
Relevant planning applications	
Site allocation	
Site objective	Redevelopment of the site to provide specialised older persons accommodation
Allocated use	**Leading land use** Specialist older persons accommodation
Development timeframe	6 – 10 ~~1 - 5~~ years
~~Indicative~~ Minimum residential capacity	28 ~~56~~ Specialist older persons accommodation
Minimum non-residential floorspace capacity (GIA)	
Planning considerations	
Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly around the west and north part of the existing building in the site. Safe access and egress routes should be directed to the north of the site towards Mountside where there is a lower risk of flooding. Development should be directed away from the northern and western areas of the site where there is higher risk of surface water flooding.
Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	RAF Northolt Safeguarding Zone
Development considerations	
Requirements	Specialised older persons accommodation Flood risk mitigation Travel Plan required to demonstrate how sustainable travel patterns for the residents of the site can be achieved.
Development principles	Redevelopment of the site should provide for a specialist older persons development that responds to the local context within which it is located. Any new development that would result in a change of use away from the existing authorised hostel use on site must demonstrate the release from this use in accordance with the Development Plan (Policy HO7).

Ref	Chapter /page/policy number	Modification
		The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements & support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. The site is located in a predominately residential area and any new development should be progressed following the guidance set out in the Tall Building SPD (Building Heights) SPD (2023).
MM95	Site O15 pp370-371	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base

Site O15 – Belmont Clinic
Site Map retained as submitted

Site information	
Address:	Belmont Health Centre, 516 Kenton Lane, Harrow Weald
Area:	0.37 ha
Description	The site is an existing medical centre within the Belmont Local Centre. The site is surrounded predominantly by suburban dwellings, with the St Joseph's Primary School opposite. The Belmont Trail runs alongside the eastern boundary of the site.
Current use	Medical centre
Ownership	Public
PTAL	2
~~Site source~~	~~Allocation in Harrow Site Allocations Local Plan (2013)~~
Relevant planning applications	
Site allocation	
Site objective	Redevelopment of the site to provide a modernised health care facility.
Allocated use	**Leading land use** Health care centre ~~**Supporting land use(s)**~~ Community or town centre uses Residential
Development timeframe	11 - 15 years
~~Indicative~~ Minimum residential capacity	~~N/A~~ 10 Dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	
Planning considerations	

Ref	Chapter /page/policy number	Modification
		Flood zone: Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at medium risk of surface water flooding, particularly in the centre of the site. Safe access and egress routes should be directed to south west of the site towards Kenton Lane where there is a lower risk of flooding. Development should be directed away from the centre of the site where there is higher risk of surface water flooding. **Heritage**: Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm) **Other**: Town Centre Boundaries (Belmont) RAF Northolt Safeguarding Zone Sites of Importance for Nature Conservation (The Rattler including Belmont Nature Walk) adjoins to the east **Development considerations** **Requirements**: Reprovision of modern health centre Enhancement to Belmont Trail **Development principles**: The redevelopment of the site may form part of a mixed use scheme which incorporates other community uses and/or town centre uses appropriate to the scale and role of this local centre. Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. The Belmont Trail runs alongside the eastern boundary of the site. The Trail is an important part of Harrow's Green Grid and the adjacent section (including the Belmont local centre car park) forms part of a designated green chain and site of importance for nature conservation. The design and layout of proposals should therefore maintain the integrity of the Trail and enhance its biodiversity value along the boundary.
MM96	Site O16 pp372-374	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) Factual update to PTAL level to ensure policy is justified 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Updated allocated uses and associated development principles to ensure an effective policy **Site O16 – Travellers Rest, Kenton Road** Site Map retained as submitted **Site information** Address: Travellers Rest, Kenton Road, Kenton Area: 0.69 ha Description: The Site contains a collection of two-three storey buildings that are currently in operation as public house (Beefeater) on Kenton Road and a hotel (Premier Inn) with hard standing areas used for car parking to the rear. It is located on the junction of Kenton Road and Carlton Avenue, and is adjacent to Kenton Underground and Overground Station.

Ref	Chapter /page/policy number	Modification	
			It is within the Kenton Road District Town Centre, which is generally characterised by 2-3 storey building with town centre commercial uses on ground floor and residential on upper floors. The only exception is the recently completed mixed use development adjacent to the station that is 3-6 storey in height. A number of sites within proximity to it have been developed in recent years and a major redevelopment/regeneration is proposed by the Brent Local Plan for Sainsbury supermarket site allocation (directly opposite it).
		Current use	- Hotel - Public house with expanded food option
		Ownership	Private
		PTAL	~~5 - 6a~~ 4 - 5
		~~Site source~~	~~Call for sites~~
		Relevant planning applications	
		Site allocation	
		Site objective	A mixed-use development that re-provides a Public House ~~and Hotel~~ within the Kenton District Town Centre, with an enabling residential element.
		Allocated use	**Leading land use** ~~Hotel~~ Public house / restaurant / bar Residential ~~**Supporting land use(s)**~~ Town centre uses
		Development timeframe	1 - 5 years
		~~Indicative~~ Minimum residential capacity	120 ~~109 C3~~ dwelling houses / units
		Minimum non-residential floorspace capacity (GIA)	1,619sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Part of the site is at risk from surface water flooding. Development should be directed away from this area in line within the sequential approach.
		Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
		Other	Town Centre Boundaries (Kenton) RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	~~Re-provision of hotel use on site~~ Re-provision of public house on site Retention of trees protected by Tree Preservation Orders (TPOs).
		Development principles	The site is located within the Kenton District Town Centre and currently is in use as a Travellers Rest Beefeater Public House and a Premier Inn Hotel. The site is rectangular in shape, extending

Ref	Chapter /page/policy number	Modification
		northwards with Carlton Road to the east and the Main Trunk train Line and London Underground / Overground train line to the west. The shape and size of the site would allow for a major mixed use scheme to be delivered on site. ~~Any new development must seek to reprovide the public house and hotel offer on site. Public Houses provide an important element in British culture and also provide an important contribution to town centres. Public houses can play a valuable role in the local community as an informal meeting place and can provide a range of community functions. They also provide an offer to support the evening economy with a centre. Kenton has a very poor offer of pubs and bars and sits well below the UK average, with only one public house identified in 2023.~~ The site can be regarded as an undesignated heritage asset, specifically the 1933 Tudor Revival style Travellers Rest hotel and former off-licence adjacent by Robert George Muir, which have key historic interest as an emblematic reminder of the growing suburban Metroland development of the 1930s that Harrow is known for, and of changing social values and social reform of the time that created 'the Improved Public House'. Any proposals would therefore need to have regard to heritage in accordance with the National Planning Policy Framework, the London Plan and heritage policies within this Local Plan. There is a need across both London as a whole and Harrow for tourism infrastructure, specifically with regard to hotels / serviced apartments. The site is in a highly sustainable location and has excellent public transport links to Wembley and Central London. Any loss of tourism accommodation from the site will be assessed in accordance with Policy LE5 – Tourism & Visitor Accommodation. Given the size of the site, an element of residential development is able to be delivered on site in conjunction with the above requirements, and may be capable of providing more height than which exists in the surrounding area. Whilst the size of the site would allow for more height, care must be taken to respect the much lower form of development, particularly along Carlton Avenue which is represented by two-story dwellings. Any new residential development must demonstrate a high quality of amenity, with particular care in relation to noise and vibration caused by the railway line along the western boundary of the site. Any new development that involves demolition of the existing buildings and new build, must provide an appropriately designed frontage to Kenton Road. This must include both in terms of an active frontage appropriate to a town centre, but also the relationship with Kenton Road, which is a busy carriage way directly adjacent to the site. The site is located in a mixed-use area but within a suburban context, any new development should be progressed following the guidance set out in the Tall Building SPD (Building Heights) SPD (2023).
MM97	Site O17 pp375-376	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base **Site O17 – Kenton Road Telephone Exchange**

Ref	Chapter /page/policy number	Modification
		Site Map retained as submitted

Site information	
Address:	9-15 Kenton Park Parade, Kenton Road, Kenton
Area:	0.08 ha
Description	The site contains a large building within Kenton Park Parade and makes an attractive contribution to the street scene. It sits within a parade of shops. The south side of Kenton Road is within the London Borough of Brent, and has a mixed character of two-storey semi-detached dwellings and shopping parades.
Current use	Telephone exchange
Ownership	Private
PTAL	3
~~Site source~~	~~Call for sites~~
Relevant planning applications	
Site allocation	
Site objective	A residential-led development that retains the attractive frontage of the Kenton Park Parade with an appropriate town centre or community use on the ground floor.
Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Town centre uses Community uses
Development timeframe	6 - 10 years
~~Indicative~~ Minimum residential capacity	13 ~~12 C3~~ dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	
Planning considerations	
Flood zone	Critical drainage area Flood zone 2 - Part of site ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at risk from fluvial flooding from the Wealdstone Brook, especially in the western part of the site. The site is at medium risk of surface water flooding, however there is a small portion at higher risk, along the northwest of the site. The areas outside the west of the site are at high risk. Safe access and egress routes should be directed to the east of the site towards Kenton Road where there is a lower risk of flooding. Development should be directed away from the north west of the site where there is higher risk of surface water flooding. Development should be directed away from the north west of the site where there is higher risk of surface water flooding.
Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	RAF Northolt Safeguarding Zone
Development considerations	

Ref	Chapter /page/policy number	Modification
		Requirements: Retention of frontage (with minor alterations on ground floor) Ground floor active frontage with appropriate town centre or community use. **Development principles**: The Kenton Road Telephone Exchange forms an attractive building within the neighbourhood parade within Kenton Park Parade. New development should seek to retain the building with a change of use to residential. To facilitate the change of use, the ground floor should be sensitively altered to enable residential use of the upper floors, and to enable a ground floor active frontage to facilitate an appropriate town centre use. Any development that seeks demolition should retain the existing frontage as this forms an attractive contribution within the parade. Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. An opportunity exists for upward extension where this is done sensitively in relation to the impact this would have on the frontage of the building, and relationship with the surrounding urban fabric.
MM98	Site O18 pp377-378	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source) Modification in relation to the Historic Environment to provide clarity to the policy

Site O18 – Wolstenholme

Site information	
Address:	Wolstenholme, Rectory Lane, Stanmore
Area:	0.25 ha
Description	Sheltered accommodation within a late Victorian/Edwardian villa fronting Rectory Lane and a two-storey, staggered 1970/80s complex to the rear
Current use	Sheltered housing for older people
Ownership	Private
PTAL	1b
~~Site source~~	~~Allocation in Harrow Site Allocations Local Plan (2013)~~
Relevant planning applications	- Lapsed permission for redevelopment (P/5758/17)
Site allocation	
Site objective	Redevelopment to provide replacement housing for older people to modern standards
Allocated use	**Leading land use** Specialist older person housing
Development timeframe	11 - 15 years
~~Indicative~~ Minimum residential capacity	Net 25 C2 residential institution units

Ref	Chapter /page/policy number	Modification
		Minimum non-residential floorspace capacity (GIA)
		Planning considerations
		Flood zone
		Heritage: Listed Buildings (Church of St John, Old Stanmore Church, multiple memorials, graves and tombs) opposite site Conservation Area (Old Church Lane Conservation Area Stanmore) adjoins site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
		Other: Site of Importance for Nature Conservation (St John the Evangelist) adjoins site RAF Northolt Safeguarding Zone
		Development considerations
		Requirements
		Development principles: The site is suitable for redevelopment to provide replacement sheltered housing to modern standards of comfort and accessibility. This is a long, narrow site and care will be needed to preserve and enhance the adjoining conservation area (which includes a number of mature trees at the boundary) and to safeguard the amenity of occupiers of property which face the site at the neighbouring Stanmore Park development. The design and layout of development on this site must be sensitive to the setting of the adjoining conservation area and the Locally listed cemetery and grade II listed Church of St John the Evangelist (church and ruin) which faces the site, and should ensure the protection of the adjoining boundary wall.
MM99	Site O19 pp379-380	**Reasons for Modification**
		Allocation removed: Site unavailable for proposed land uses
		~~**Site O19 – Marsh Lane Gas Holders**~~ ~~Site Map retained as submitted~~
		~~**Site information**~~
		~~Address:~~ ~~Gas Works, Marsh Lane, Stanmore~~
		~~Area:~~ ~~0.88 ha~~
		~~Description~~ ~~A former gasholder site on Marsh Lane that has been cleared of any structures. This is woodland around the south and west of the site, with back gardens of houses to the east and north. Retained gas infrastructure is located immediately to the west of the site, with access via the subject site~~
		~~Current use~~ ~~Former gas holders site, currently unused~~
		~~Ownership~~ ~~Private~~
		~~PTAL~~ ~~2~~
		~~Site source~~ ~~Call for sites~~
		~~Relevant planning applications~~ ~~- Permission for infilling of former gas-holder bases (P/1088/20)~~ ~~- Revocation of hazardous substances consent (P/2536/22)~~

Ref	Chapter /page/policy number	Modification
		~~Site allocation~~
		~~Site objective~~ — ~~Redevelopment of the site to deliver housing~~
		~~Allocated use~~ — ~~**Leading land use**~~ ~~Residential~~
		~~Development timeframe~~ — ~~6-10 years~~
		~~Indicative residential capacity~~ — ~~70 C3 dwelling houses / units~~
		~~Planning considerations~~
		~~Flood zone~~ — ~~Critical drainage area~~ ~~Flood zone (Surface Water) 3a - Part of site~~
		~~Heritage~~ — ~~Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)~~
		~~Other~~ — ~~Site of Importance for Nature Conservation (Stanmore Marsh) adjoins site~~ ~~RAF Northolt Safeguarding Zone~~
		~~Development considerations~~
		~~Requirements~~ — ~~Improvements to Stanmore Marsh~~
		~~Development principles~~ — ~~The site is a former gas holder site which has now been decommissioned with some ancillary infrastructure on the western boundary. Redevelopment of the site will need to have regard to any requirements associated with this infrastructure, including access easements (including a requirement for 24 hour 7-day-a-week access for heavy goods vehicles from Marsh Lane, as well as access from Wychwood Avenue) and a no-build easement along the western boundary of the site.~~ ~~The site is located within a generally suburban area, and therefore suitable for new residential development. New residential development should be delivered in a manner that relates sensitively to the wider area, and provide a satisfactory level of carparking. Given the context of the site, it would be suitable for self-build housing provided this resulted in the efficient and optimal use of the site and met any requirements in relation to gas infrastructure.~~ ~~Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.~~ ~~To the south of the site is Stanmore Marsh (with a small element to the west) which is a Site of Importance for Nature Conservation. All new development must be designed in a manner that addresses such a sensitive receiving environment in terms of light spill and other potential impacts on Stanmore Marsh.~~ ~~New development should refer to the Harrow Tall Building (Building Heights) SPD 2023.~~
MM100	Site O20 pp381-382	**Reasons for Modification** Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Updated allocated uses to ensure an effective policy Reference to parking standards to add clarity and effectiveness with respect to amended policy M2 of the Local Plan
		Site O20 – Canons Park Station Carpark

Ref	Chapter /page/policy number	Modification

Site Map amended to remove the area covered by the long lease to the Ambulance service as this is not justified

Map 1: Regulation 19 Consultation Version

Map 2: Post Examination in Public; Revised site plan

Site information	
Address:	Car Park Rear of Canons Park Station, Donnefield Avenue, Canons Park
Area:	0.43 ha
Description	A long and narrow commuter carpark for Canons Park Station. It is between 3-storey flat buildings (to the east) and the railway line, with Canons Park to the north.
Current use	Surface level carpark
Ownership	Public
PTAL	2 - 3
~~Site source~~	~~Call for sites~~ ~~Allocation in Harrow Site Allocations Local Plan (2013)~~
Relevant planning applications	- Former application for residential accommodation refused (P/0858/20) and dismissed at appeal.
Site allocation	
Site objective	Housing development which improves access to Canons Park Station, while providing a sufficient level of car parking associated with the station ~~and the development itself.~~
Allocated use	**Leading land use** Residential Public Car parking to support multi-modal travel
Development timeframe	6-10 years
~~Indicative~~ Minimum residential capacity	29 ~~26 C3~~ dwelling houses / units
Minimum non-residential floorspace capacity (GIA)	
Planning considerations	

Ref	Chapter /page/policy number	Modification

Flood zone	
Heritage	Conservation Areas (Canons Park Estate Conservation Area) Registered Parks and Gardens adjoins site
Other	Site of Importance for Nature Conservation (Canons Park and Stanmore Railway Embankments) adjoins site RAF Northolt Safeguarding Zone
Development considerations	
Requirements	
Development principles	The site is suitable for partial residential development with retention of an appropriate amount of public station car parking to support multi-modal travel on the Jubilee line ~~help meet demand generated by commuters~~. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the retention or re-provision of car parking capacity on the site or elsewhere. Any car parking will need to be in accordance with Local Plan Policy M2B. To the north of Donnefield Avenue is Canons Park, designated as a Registered Historic Park and Garden (which is also part of the Canons Park Estate Conservaton Area). The park also contains several statutory listed buildings and structures. Both Canons Park and the railway embankment form a part of a Site of Importance for Nature Conservation (borough importance Grade II). The design and layout of development on the site should be sensitive to these designations and to the amenities of occupiers of residential property on the opposite side of Donnefield Avenue. As the site is adjacent to London Underground infrastructure, early consultation with Transport for London's infrastructure protection team will be required. New development should refer to the Harrow Tall Building (Building Heights) SPD 2023.

Ref	Chapter /page/policy number	Modification
MM101	Site O21 pp383-384	**Reasons for Modification**

Deletion of text not necessary to meet the test of soundness (Site source, supporting land uses, Use Class Order)
'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy.
Provide certainty of non-residential use and quantum to ensure policy is justified and effective
Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base
Reference to parking standards to add clarity and effectiveness with respect to amended policy M2 of the Local Plan

Site O21 – Anmer Lodge

Site information	
Address:	Anmer Lodge, Coverdale Close, Stanmore
Area:	1.37 ha
Description	Car parks located in the Stanmore Town Centre behind buildings on the Broadway and Stanmore Hill.
Current use	Car parking
Ownership	Private
PTAL	2 - 3
~~Site source~~	~~Allocation in Harrow Site Allocations Local Plan (2013)~~

Ref	Chapter /page/policy number	Modification	
		Relevant planning applications	- Permission for mixed use redevelopment including residential and retail food store (P/0412/14) - Permission for redevelopment on land in western part of site P/3109/20
		Site allocation	
		Site objective	Mixed-use development of this under-utilised town centre site which includes a supermarket as well as a suitable level of residential use, while re-providing an appropriate level of car parking.
		Allocated use	**Leading land use** Residential ~~**Supporting land use(s)**~~ Town centre uses Car parking
		Development timeframe	1-5 years
		~~Indicative~~ Minimum residential capacity	138 ~~141 C3~~ dwelling houses / units
		Minimum non-residential floorspace capacity (GIA)	1,600sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ The site is at high risk of surface water flooding, particularly along the southeast of the site. Safe access and egress routes should be directed to the southwest of the site towards Rainsford Close and Coverdale Close where there is a lower risk of flooding. Development should be directed away from the southeast side of the site where there is higher risk of surface water flooding.
		Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
		Other	Town Centre Boundaries (Stanmore) Primary Shopping Area RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Appropriate level of replacement car parking for the town centre Supermarket (1600sqm)
		Development principles	The site is suitable for mixed-use development to accommodate a moderately sized supermarket and a community use. The boundary of Stanmore district centre is contiguous with the north side of the car park, and the retail/any other town centre uses should therefore be located within the southern half of the site. Residential development of a form and density suitable to this town centre location should form part of the mix on the southern part of the site. More traditional residential development, which reflects the context created by existing housing in Coverdale Close, is likely to be appropriate to the north of the site. Development of the site must ensure that the retail and any other town centre components are properly related to existing frontage in The Broadway, and that satisfactory arrangements for the servicing of these uses are made.

Ref	Chapter /page/policy number	Modification	
			There is a significant fall in site levels from north to south which will need to be addressed in a way which secures the implementation of Green Grid projects to enhance links between the Belmont Trail and the Green Belt. Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. A significant portion of the site is located within Stanmore District Town Centre, and accordingly is an appropriate location for town centre uses as part of any comprehensive development of the site. Such floorspace should be commensurate to the scale and function of the centre. Any car parking will need to be in accordance with Local Plan Policy M2B. The site is currently divided into two different parcels each of which contains a car park. The design of any proposal should maximise the capacity of the whole site and ensure that a unified design can be achieved. New development should refer to the Harrow Tall Building (Building Heights) SPD 2023.
MM102	Site O22 pp385-386	**Reasons for Modification**	
		Deletion of text not necessary to meet the test of soundness (Site source, Use Class Order) 'Indicative' housing capacity replaced with 'Minimum' housing capacity, and capacity number updated to ensure justified and effective policy. Provide certainty of non-residential use and quantum to ensure policy is justified and effective Updated flood risk text added to ensure an effective and justified policy with respect to terminology and evidence base Updated allocated uses to ensure an effective policy Reference to parking standards to add clarity and effectiveness with respect to amended policy M2 of the Local Plan Updated site allocation boundary to provide clarity	
		Site O22 – Stanmore Station Carpark Map change as amended below for effectiveness and included in Atlas of Change	

Ref	Chapter /page/policy number	Modification

Map 1: Regulation 19 Consultation Version

Map 2: Post Examination in Public; Revised site plan

Site information	
Address:	Stanmore Station Car Park, London Road, Stanmore
Area:	~~1.39~~ 1.59 ha
Description	This site is used as a car park for the adjacent Stanmore Underground Station. It is located within proximity to Stanmore District Centre (400m). The site is long and narrow and lies between the railway depot and the back gardens of houses and a school (to the east).
Current use	Surface level carpark
Ownership	Public
PTAL	~~2 – 3~~ 4
~~Site source~~	~~Call for sites~~ ~~Allocation in Harrow Site Allocations Local Plan (2013)~~
Relevant planning applications	- Former application for residential accommodation withdrawn (P/1221/20)
Site allocation	
Site objective	Housing development which improves access to Stanmore Station, while providing a sufficient level of **public** car parking
Allocated use	**Leading land use** Residential Public Car parking Transport operations Class E
Development timeframe	6-10 years
~~Indicative~~ Minimum residential capacity	199 ~~183 C3~~ dwelling houses / units

Ref	Chapter /page/policy number	Modification	
		Minimum non-residential floorspace capacity (GIA)	660sqm
		Planning considerations	
		Flood zone	Critical drainage area ~~Flood zone (Surface Water) 3a - Part of site~~ Part of the site is at risk from surface water flooding. Development should be directed away from this area in lie with the sequential approach.
		Heritage	Locally Listed Building (Stanmore Station) adjoins site Conservation Area (Kerry Avenue Conservation Area) adjoins site
		Other	Site of Importance for Nature Conservation (Canons Park and Stanmore Railway Embankments) adjoins site RAF Northolt Safeguarding Zone
		Development considerations	
		Requirements	Reprovision of suitable level of car parking for commuters and in connection with major events at Wembley Stadium Step -free access to Stanmore Station
		Development principles	The site is suitable for partial residential development with reprovision of an appropriate amount of public station car parking to help meet demand generated by commuters and in connection with major events at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere. Any car parking will need to be in accordance with Local Plan Policy M2B. Redevelopment of the site should enable ~~facilitate~~ step-free access to Stanmore Station, both from London Road and from the retained or replacement car-parking facility. There is a significant fall in site levels away from London Road, which bounds the site to the north. This should be considered in development design. Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements. The southern boundary of the site is contiguous with the northern boundary of a small, wooded area which forms a part of a Site of Importance for Nature Conservation; the design and layout of development must be sensitive to this nature conservation site. The setting of the adjoining Kerry Avenue Conservation Area and locally listed Stanmore Station should be considered. As the site is adjacent to London Underground infrastructure, early consultation with Transport for London's infrastructure protection team will be required. New development should refer to the Harrow Tall Building (Building Heights) SPD 2023.

Ref	Chapter /page/policy number	Modification		Reason for Modification
MM103	Appendix 1 p390	Extra care accommodation for older people	A form of ~~sheltered~~ housing for older people who are becoming frailer and less mobile and have higher support and care needs than those that can be met in general needs ~~or sheltered~~ housing. It contains self-contained homes and communal facilities, and has with design features and care and support services which enable self-care and independent living. This form of housing enables older people with a wide range of needs to remain living independently in the community, whilst being able to access care from staff available 24 hours per day if needed.	To clarify that not all extra care products are sheltered housing, to improve the effectiveness of the plan.
MM104	Appendix 1 p391	Green infrastructure	~~A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.~~ Comprises the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems, all of which provide a wide range of benefits and services.	To reflect the definition in the London Plan for consistency.
MM105	Appendix 1 p395	~~Sheltered accommodation for older people~~	~~Self-contained accommodation specifically designed for older people who require no or a low level of support. Schemes normally include additional communal facilities such as a residents' lounge and a scheme manager, warden or personal alarm/telecare system.~~	To avoid duplication with other defined older persons housing products in the Plan, to improve effectiveness.
MM106	Appendix 1 p396	Social infrastructure	~~Facilities providing a wide variety of services that are essential to the sustainability and wellbeing of a community such as education facilities, places of worship, burial space, policing and justice, health provision, community, polling stations, cultural, public houses, recreation and sports facilities. This list is not intended to be exhaustive and other facilities may be included.~~ Covers facilities such as health provision, early years provision, schools, colleges and universities, community, recreation and sports facilities, places of worship, burial space, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive, and other facilities can be included as social infrastructure.	To reflect the definition in the London Plan for consistency.
MM107	Appendix 1 p396	Specialist older persons accommodation	A term used to describe a range of types of housing, not including care homes, that enables older people to live independently in self-contained living spaces with the possibility of some communal facilities and varying levels of support if needed. This can include retirement living, ~~sheltered housing for older people,~~ extra care housing, care villages and continuing care retirement communities.	To clarify that not all older persons housing products are sheltered housing, to improve the effectiveness of the plan.
MM108	Appendix 2, introductory text, para A.2.3, p. 398	A.2.3 The AMR will not monitor every aspect of the Local Plan. Doing so would not be practical, and the volume of information required would detract from the provision of a clear and succinct statement of how the Local Plan is performing. Instead, the following sets of indicators have been created: (a) A set of key performance indicators (KPIs) have been created which capture the key aspects of successful implementation of the Local Plan's policies. (b) Additional indicators which provide additional information or context and which illustrate the performance of specific parts of the Local Plan. (c) Some indicators do not have specific targets but 'monitoring points' have been identified which will be monitored on an annual basis to identify if there are any trends or implementation issues that any future Local Plan should have regard to, or if any supplementary guidance is required to assist in the implementation of the policy.		Paragraph A.2.3 updated to reflect additional indicators and how those will be monitored, in order to improve the effectiveness of the plan.

<table>
<tr><th>Ref</th><th>Chapter /page/policy number</th><th>Modification</th><th>Reason for Modification</th></tr>
<tr><td><u>MM109</u></td><td>Appendix 2, Key performance indicators table on page 399</td><td>

Key performance indicators

<table>
<tr><th colspan="2">Indicator</th><th>Target</th></tr>
<tr><td>KPI1</td><td>Supply of new homes over the plan period
Measured by housing completions and net pipeline of approved housing units</td><td>On track to exceed 16,040 homes between 2021-41</td></tr>
<tr><td>KPI2</td><td>Supply of new affordable homes
% of total new housing supply by number of units and number of habitable rooms</td><td>50% of total new housing supply, measured by number of units and number of habitable rooms</td></tr>
<tr><td>KPI3</td><td>Town centre vacancy rates
measured as % of centre frontage that is vacant</td><td>Remain below 7% Borough-wide and below 10% in each centre</td></tr>
<tr><td>KPI4</td><td>Net loss of industrial floorspace or land</td><td>No net loss (floorspace and premises)</td></tr>
<tr><td>KPI5</td><td>Energy efficiency
Proportion of major applications ~~meeting~~ <u>incorporating low carbon renewable energy and meeting energy efficiency</u> targets on-site <u>to achieve net-zero carbon</u> (vs offsetting)</td><td>Energy efficiency targets from the Local Plan (CN2) achieved, with offsetting in exceptional circumstances only.

<u>All major developments are net-zero carbon, with offsetting used to achieve this in exception circumstances only.</u></td></tr>
<tr><td>~~KPI6~~</td><td>~~Net-zero carbon~~
~~Proportion of major applications incorporating on-site energy generation to achieve net-zero carbon (vs offsetting)~~</td><td>~~All major developments are net-zero carbon, with offsetting used to achieve this in exception circumstances only.~~</td></tr>
<tr><td>KPI6~~7~~</td><td>Public transport accessibility
Proportion of new dwellings in PTAL 3+ or achieving PTAL 3+ through improvements to public transport service associated with development</td><td>Improvement on 2012-2024 baseline of 68% (or alternative value following updated methodology)</td></tr>
</table>

</td><td>Updated to improve the monitoring of plan and improve its effectiveness.</td></tr>
</table>

MM110	Appendix 2 pp399-402	**Indicator Reference and Indicator**		**Target or Monitoring Point**	**Relevant Policies**	Additional policies have been added to the Monitoring Framework to ensure the plan can be comprehensively monitored on an annual basis. The wording of Indicators, Targets and Monitoring Points has been updated and clarified in many instances to provide a more effective monitoring framework. Some indicators do not have specific targets but 'monitoring points' have been identified which will be monitored on an annual basis to identify if there are any trends or implementation issues that any future Local Plan should have regard to, or if any supplementary guidance is required to assist in the implementation of the policy.
		General				
		Appeals allowed which contravene a strategic principle of the local plan, with major contraventions identified, including development: - Adversely affecting local character ~~or areas of special character~~ - Harming protected views - Inappropriate garden development - Compromising heritage significance or setting - Inappropriate development in the green belt and MOL - Loss of Open Space		Annual monitoring of the number of appeals decisions that are contrary to principles development plan policy	Multiple policies	
		Chapter 02: High quality growth				
		GR-I1	~~Tall buildings~~ ~~Tall Buildings allowed inconsistent with policy~~ Number of applications for tall buildings outside of the designated tall building zones	No ~~speculative~~ applications for tall buildings approved outside of Designated Tall Building Zones	GR4	
		GR-I2	Number of appeals allowed following refusal on design grounds as being contrary to policies seeking to achieve high quality growth and design	Annual monitoring of the number of appeals allowed each year following refusal on design grounds	GR1 - GR3a	
		GR-I3	Percentage of units which are M4(2): accessible and adaptable dwellings compliant; and percentage of units which are M4(3) wheelchair user dwellings compliant	All new homes to meet M4(2) standard and 10% of new homes to meet M4(3).	GR1, GR2, GR3a, HO6	
		GR-I4	Approved residential basements in existing properties that are larger than policy criteria	Annual monitoring of the number of applications approved contrary to the policy (criteria Ab & c)	GR4A	
		GR-I5	Number of applications approved for development within protected viewing corridors,	Number of applications approved that are contrary to the policy	GR5	
		GR-I6	Level of funding secured through S106 planning obligations, Community Infrastructure Levy, or any replacement infrastructure funding mechanisms.	Annual monitoring of receipts from funding streams received.	GR11	
		GR-I7	Progress on the delivery of housing and other site allocations	Annual monitoring of progress on each site allocation against the expected delivery timescale.	GR12	
		Chapter 03: Historic Environment ~~Heritage~~				
		HE-I1	Number of assets on the Historic England Heritage 'at risk' register	Reduction in assets at risk	HE1, HE2	
		HE-I2	Number of listed buildings lost as a result of development	No loss of listed buildings	HE1, HE2	
		Chapter 04: Housing ~~Meeting Harrow's Housing Needs~~ (in addition to KPIs 1-2)				
		HO-I1	Net additional dwellings delivered within Harrow and Wealdstone Opportunity Area	Minimum of 8,300 dwellings by 2041	SP3	
		HO-I2	Net additional dwellings delivered within rest of Borough	Minimum of 2,500 dwellings by 2041	SP3	

Ref	Chapter /page/policy number	Modification				Reason for Modification
		HO-I3	Net loss of dwellings through site development	The number of dwellings lost each year.	SP3	
		HO-I4 ~~HO-I1~~	~~Bedroom mix :~~ ~~Mix of number of bedrooms in new housing~~ Net additional family sized (3b/+) dwellings delivered	3~~2~~5% of new dwellings to be family sized housing (3+ bedrooms), or updated target based following update in evidence base	HO1	
		HO-I5	Number of two bed four person homes as a percentage of total two bed units delivered	100% of two bed units delivered are of a sufficient size to accommodate 4 bed spaces	HO1	
		HO-I6 ~~HO-I2~~	~~Bedroom mix – affordable housing~~ Mix of number of bedrooms in new affordable ~~housing~~ tenure relative to identified local need	In line with up to date Council requirements and evidence base	HO1, HO4	
		HO-I7 ~~HO-I3~~	Number of dwellings delivered on small sites	At least 375 per year to reflect requirements of London Plan policy H2	HO3, GR10	
		HO-I8 ~~HO-I4~~	Number of family homes converted into self-contained residential units without reprovision of at least a 3- bedroom 4-person dwelling.	No net loss of family sized (3+bedroom) accommodation through this type of development.	HO2	
		HO-I9 ~~HO-I5~~	~~Affordable housing tenure~~ Tenure mix of new affordable housing units relative to identified local need	70% of units to be low cost rented and 30% intermediate, or updated %s following update in evidence base or policy	HO4	
		HO-I10 ~~HO-I6~~	Off-site affordable housing contributions secured in lieu of on-site provision	Annual monitoring of instances where payments in lieu have been received and the reasons for this	HO4	
		HO-I11	Number of estate (or council led urban) regeneration schemes delivered by 2041	Annual monitoring of the number of net additional residential units delivered on estate regeneration schemes.	HO5	
		HO-I12	Number of older specialised accommodation units delivered	Minimum of 980 units delivered between 2022 -32 or a target based on updated evidence	HO6	
		HO-I13	Number of older person nursing beds spaces delivered	Minimum of 200 bed spaces delivered between 2022 -32 or a target based on updated evidence	HO6	
		HO-I14	Number of supported and specialist housing delivered	Annual monitoring of the number of supported and specialist homes delivered.	HO7	
		HO-I15	Number of purpose-built student accommodation units delivered within/edge of town centres	Annual monitoring of the number of student units delivered.	HO8	
		HO-I16	Number of large-scale purpose-built shared living developments within the Opportunity Area/outside and within a 250 distance of similar scheme	Annual monitoring of the number of purpose built schemes approved outside of radius specified in the policy.	HO9	

Ref	Chapter /page/policy number	Modification				Reason for Modification
		HO-I17	Number of HMO schemes/bed spaces delivered outside areas of PTAL 4-6	Annual monitoring of the number of HMO units delivered.	H10	
		HO-I18	Number of Self Build and custom build housing units delivered	Annual monitoring of the number of self and custom build units completed.	HO11	
		~~HO-I7~~	~~Number of other s dwellings delivered by type including:~~ ~~- C3 older persons units~~ ~~- Care homes~~ ~~- Supported and sheltered housing~~ ~~- Purpose built student accommodation~~ ~~- Large scale purpose shared living within~~ ~~- HMOs~~		~~HO6, HO7, HO8, HO9, HO9, HO10~~	
		~~HO-I8~~ HO-I19	Progress towards meeting additional need for gypsy and traveller accommodation	~~12~~ 13 additional pitches by 2032~~41~~ and beyond this period a target based on updated evidence	HO12	
		Chapter 05: Local eEconomy (In addition to KPIs 3-4)				
		~~LE-I1~~	~~Additional employment generating floorspace permitted or completed by type~~	~~Combined retail / cultural / leisure of 13,900 sq m and industrial of 6,000 sq m (subject to any subsequent evidence with respect to floorspace need). No Net Loss.~~	~~SP4~~	
		LE-I1	Net additional employment floorspace delivered from intensification in SIL and LSIS or co-location in LSIS	Minimum of 6,000 sq m of industrial floor space delivered by 2041 or a target based on updated evidence. No net loss of employment floor space, particularly industrial	SP4, LE3	
		LE-I2	Net additional retail, cultural, leisure and other town centre floorspace provided within town centre boundary	Minimum of: (1) 13,900 sqm of retail, food and beverages floor space; (2) 7,000 sqm of leisure, entertainment and cultural uses floor space; by 2041 or targets based on updated evidence. No net loss of town centre floor space	SP4, LE1	
		LE-I3	Planning permissions granted for main town centre uses in edge of centre and out of centre locations.	Annual monitoring of town centre uses permitted in outer/edge of and out of centre locations	SP4, LE1	
		LE-I4	Number of applications approved for night-time economy uses (i.e. eating, drinking , leisure) in Harrow Metropolitan Town Centre and other suitable locations	Annual monitoring of the number of applications approved for night time economy uses.	SP5, LE1, LE2	

Ref	Chapter /page/policy number	Modification				Reason for Modification
		LE-I5	New non-residential floor space provided within the Opportunity Area	Minimum of 25,360 m^2 of non-residential floorspace within the opportunity area by 2041 or a target based on updated evidence.	SP5, LE1	
		LE-I 7~~2~~	Total amount of office floorspace across the Borough and any change	No specific target but to monitor release from stock to determine any interventions if required (supply versus need).	LE1	
		LE-I8~~3~~	Office vacancy rate across the Borough.	Vacancy rate does not exceed the London average (as measured by the GLA)	LE1	
		LE-I9~~4~~	~~Local employment~~ Job density, defined as number of jobs divided by number of people aged 16-64	Remain above 0.5 (ONS 2021 figure for Harrow)	SP4	
		LE-I10	Net additional visitor bed spaces provided	Minimum 270 visitor bed spaces by 2041 or a target based on updated evidence. No net loss.in existing visitor bed spaces	LE5	
		Chapter 06: Social ~~Community~~ infrastructure				
		~~C~~SI-I1	Change in social ~~community~~ infrastructure provision	No net loss of social ~~community~~ infrastructure floorspace	~~CI1~~SI1, SI2, SI3	
		Chapter 07: Green ~~i~~Infrastructure				
		GI-I1	Change in the total amount green belt or metropolitan open land ~~space~~	No net loss of green belt or metropolitan open land ~~space~~	GI1	
		GI-I2	Change in the total amount of open space across the Borough	No net loss of open space	GI2	
		GI-I3	Proportion of new dwellings within walking distance of open space or delivering new open space through development	Improvement on 2012-2024 baseline (as provided below or updated with alternative methodology): - 65% within 400m of park, garden or recreation ground of at least 1ha - 91% within 800m of park, garden or recreation ground of at least 2ha	GI2	
		GI-I4	Net gain in Biodiversity secured from new development over plan period	At least 10~~5~~% net gain secured on new development that meet the thresholds for BNG (including offsetting) over plan period	GI3	
		GI-I5	Urban Greening factor on major developments	Meeting UGF of 0.4 (residential) and 0.3 (commercial)	G14	
		GI-I6	Change in community gardens and food growing spaces	No net loss of food growing spaces	G15	
		Chapter 08: Responding to the Climate and Nature Emergency				

Ref	Chapter /page/policy number	Modification				Reason for Modification
		CN-I1	Number of developments permissioned where the Environment Agency has outstanding advice that there has been failure to make appropriate provision for flood risk mitigation, or which would increase risk or consequence of flooding	Annual monitoring of applications approved against the Environmental Agency advice	CN3	
		CN-I2	Proportion of major applications approved with SUDS which achieve greenfield surface water run off rates	Annual monitoring of the number of applications achieving greenfield surface run off rates	CN4	
		Chapter 09: Waste ~~&~~ and Supporting the Circular Economy				
		CE-I1	Proportion of municipal waste recycled or composted	Positive trend (i.e. increase in percentage) year on year	CE1	
		Chapter 10: Transport & Movement (in addition to KPI 7)				
		M-I1	Reduction in private vehicle mode share	Positive trend year on year	M1	
		M-I2	Increase in EV Charging points in new developments/public realm	Positive contribution to the Council's EV strategy targets	SP10	
		M-I3	Modal share of journeys by walking, cycling, public	By 2041 80% of all journeys will be undertaken by walking, cycling and public transport.	SP10, M1	
		M-I4	Number of cycle parking spaces provided in completed major developments	Positive trend Delivery in accordance with London Plan	M1, M2	
		M-I5	Number of major applications with a Construction Logistics Plan	100% of application should be approved with a CLP	M3	

<table>
<tr><th>Ref</th><th>Chapter /page/policy number</th><th>Modification</th><th>Reason for Modification</th></tr>
<tr><td><u>MM111</u></td><td>Appendix 5 Table p408</td><td>
<table>
<tr><th>Name of current document</th><th>Date of Adoption</th><th>Elements deleted / superseded</th><th>Replacement document</th></tr>
<tr><td>Harrow Core Strategy</td><td>26 February 2012</td><td>Entire document / all policies</td><td rowspan="4">Harrow Local Plan 2021-2041 (if / when adopted)</td></tr>
<tr><td>Harrow Development Management Policies</td><td>4 July 2013</td><td>Entire document / all policies</td></tr>
<tr><td>Harrow Site Allocations</td><td>4 July 2013</td><td>Entire document / all site allocations ~~(any designations continue as shown on Policies Map)~~</td></tr>
<tr><td>Harrow and Wealdstone Area Action Plan</td><td>4 July 2013</td><td>Entire document, including all policies and site allocations ~~(any designations continue as shown on Policies Map)~~</td></tr>
<tr><td>Policies Map</td><td>4 July 2013</td><td>As set out in the ‘Atlas of Change’</td><td>Updated Policies Map to reflect Harrow Local Plan 2021-2041 (if / when the Plan is adopted).</td></tr>
</table>
</td><td>Updated to clarify that all site allocations are included in the new Local Plan Policies Map.</td></tr>
</table>

MM112 | Appendix 6 (new)

Appendix 6: Marketing Requirements

A.6.1. Table A6.1 summarises the marketing and vacancy requirements in policies that require marketing and/or vacancy for a change of use. Information and explanation provided in policies and their supporting text should be reviewed in conjunction with Table A6.1 and the other requirements in Appendix 6. Table A6.1 should be read using the 'existing use' as the starting point and then the relevant 'proposed use' identifies the marketing and/or vacancy requirements for that change of use.

Policy	Geographical Extent	Existing Use	Proposed Use	Marketing Period	Vacancy
LE1	Primary Shopping Area	Conditioned E use	Other E use	6 months	N/A
		E use	Non E main town centre use	24 months	24 months
		E use	Residential	24 months	24 months
	Metropolitan, District, Local Centre, Neighbourhood Parade	Conditioned E use	Other E use	6 months	N/A
		E use	Non E main town centre use	24 months	24 months
		E use	Residential	24 months	24 months
	Borough wide	Main town centre use	Residential	24 months	24 months
		Office	Residential	12 months	12 months
SI1	Borough wide	Social infrastructure use	Residential	24 months	24 months
LE2	Borough wide	Night time use	Non-night time use	24 months	24 months
LE5	Borough wide	Hotel	Other use	24 months	N/A
E7 (London Plan)	Borough wide	Industrial	Non-industrial use	12 months	12 months
HC7 (London Plan)	Borough wide	Public House	Other use	24 months	24 months

Table A6.1 – Marketing requirements

A.6.2. Where policies require marketing information to be submitted, the following details will be used to assess the acceptability, or otherwise, of the information submitted and any marketing undertaken.

A.6.3. Marketing evidence requires demonstration of an active marketing campaign for a continuous period, which has been shown to be unsuccessful. Where vacancy is also required by policy, marketing must take place whilst the premises are vacant unless otherwise stated.

A.6.4. The minimum period of vacancy/marketing is identified within relevant policies and summarised in the table above. It must be shown to the Council's satisfaction that marketing has been unsuccessful for all relevant floorspace.

A.6.5. Marketing and vacancy criteria will be kept under review and may need to be changed over time – this will be done through guidance.

A.6.6. Additional considerations in relation to Class E: For proposals that are marketed within Class E it will be important that the existing use plus all uses within Class E are specified in order to robustly demonstrate there is no demand for the floorspace. A log should be provided evidencing the range of uses advertised, prices advertised and all offers received, this should be accompanied by a signed declaration. Where specific Class E uses are not marketed or are excluded from marketing due to site specific or local circumstances this should be robustly justified.

- Where a property is vacant and is being marketed, if a new occupier is found the council encourages properties to be brought back into commercial use as soon as possible to avoid unnecessary vacancy.
- Where a specific use or uses is conditioned within Class E and a proposal seeks to change to another Class E use(s), six months of marketing for the specific use will be required to demonstrate that there is no longer demand for the use(s) it was secured for in line with relevant policies. In this instance there is no requirement for the premises to be vacant.

Included to make the Plan effective in determining how long an existing use needs to be marketed for/ vacant before change of use will be acceptable.

Ref	Chapter /page/policy number	Modification	Reason for Modification
		A.6.7. A detailed marketing report must be submitted to the Council and must include appropriate evidence of all of the following. Examples of the type of evidence that could be used to demonstrate that each criterion has been met is also set out below. The examples provided are not an exhaustive list. a. Registration of the property with at least one reputable local or national commercial property agent - this could be evidenced through submission of appropriate correspondence from the property agent setting out marketing has commenced/is underway. b. The length of marketing and vacancy periods, including dates. Marketing must be continuous and from the point when the advertisement board was erected or the online ad was posted (not from the point at which the property agent was appointed). The length of the vacancy period must be clearly evidenced e.g. through the submission of correspondence from the property agent. c. Erection of an advertising board in a prominent location on-site (subject to advertising consent, if required) for the duration of the marketing period – this could be evidenced with photographs of the board in place. d. Publication of property details/particulars online on popular commercial property letting/selling websites – this could be evidenced with screenshots of the webpages of where the space is advertised. e. Advertisements must include the following basic information: location, size, site description, lawful land use, property type, specification and costs (including rent and service charges) – this could be evidenced through providing the marketing particulars. f. Property details/particulars available to inquirers on request – this could be evidenced through particulars and advertising board setting out contact details. g. Property marketed for the appropriate use or uses as defined by the relevant planning policy – this could be evidenced through marketing particulars and advertisement board setting out appropriate uses. h. Property marketed at a reasonable price that genuinely reflects the market value, including in relation to appropriate use or uses, condition, quality and location of floorspace, including independent professional valuation from at least three agents to confirm the price is reasonable – this could be evidenced with statements from independent property agents/valuers. Where existing floorspace is in poor condition, marketing should include options for both renting the floorspace as is (i.e. the occupier takes responsibility for any refurbishment) and in a refurbished state. The rental values sought for un-refurbished or refurbished floorspace must be aligned with comparable values for similar quality properties in the area. Any submitted marketing at values which are not comparable to similar properties in the area will not be counted toward the continuous marketing requirement. i. Detailed commentary on any enquiries received. The number of enquiries must be set out. Information on who the enquiry was from i.e. the name and type of business/organisation, and the type of space/use they required must be provided. Details on outcome of any enquiry and in particular why any enquiry was not successful must also be set out – this could be evidenced within a table and/or email correspondence from enquirers. j. Detailed commentary on any viewings undertaken, setting out the number of viewings undertaken, who viewed the space i.e. the name and type of business/ organisation, reasons why those viewing the space did not wish to make an offer - this could be evidenced within a table and/or email correspondence from enquirers. k. Detailed commentary on the number, type, and value of offers received. Information on who made the offer, i.e. the name and type of business/organisation, and the type of space/use they required must be provided. Where offers were received but not accepted, reasons for refusal must be provided - this could be evidenced within a table and/or email correspondence from enquirers.	