

HARROW LOCAL PLAN 2021-2041

EXAMINATION IN PUBLIC

SCHEDULE OF PROPOSED ADDITIONAL MODIFICATIONS (AM)

5 NOVEMBER 2025

In addition to the Main Modifications produced by the Inspector as part of her examination of the draft Harrow Local Plan, the Council is publishing this schedule of proposed Additional Modifications to the Local Plan. These are changes that taken together the Council considers do not materially affect the Plan and which it can therefore make when the Plan is adopted. These are minor changes not required to make the plan sound and include updates, changes for consistency and clarity and corrections. This is not part of the formal Local Plan examination. The Council rather than the Inspector will consider any comments received on the modifications in this schedule.

The modifications below are expressed either in the conventional form of ~~striketrough~~ 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.

This schedule should be read in conjunction with the Inspector's proposed Main Modifications (that form part of the Examination in Public process and are subject to formal consultation).

Chapter 0 – Introduction

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM1	Page 3, Heading and Para 0.0.1 -	What is a Local Plan? Harrow Local Plan 2021-2024 0.0.1 <u>The Council formally commenced work on producing a new Local Plan for Harrow (referred to as Local Plan, hereafter) in 2018 and a number of important stages, prior its adoption, were completed in accordance with the Planning and Compulsory Purchase Act 2004 and The Town and Country Planning (Local Planning) (England) Regulations 2012. National planning policy places Local Plans at the heart of the planning system and consequently the Government considers that it is essential that they are in place and kept up to date. The Local Plans sets out a vision and a framework for the future development of an area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design.</u>	Text updated to reflect progression of Local Plan and its intended adoption (if found sound).
AM2	Page 3 Para 0.0.3	0.0.3 <u>The Local Plans are also a critical tool in guiding decisions about individual development proposals, as they are the starting point for considering whether applications can be approved. The Harrow Local Plan 2021-2041 upon adoption replaced the previous Local Plan, which comprised of a framework of development plan documents, namely the Core Strategy (2012), Development Management Policies (2013), the Harrow and Wealdstone Area Action Plan (2013) and Site Allocations (2013), as well as an accompanying Policies Map. Upon adoption, the Harrow Local Plan 2021-2041, along with the London Plan (2021), the Joint West London Waste Plan (adopted July 2015), any future Neighbourhood Plans and any subsequent updates to these; will form the Development Plan for Harrow.</u>	Delete para 0.0.3 and replace with new text to reflect progression of Local Plan and its intended adoption (if found sound).
AM3	Page 3 Para 0.0.4	Harrow's current Local Plan 0.0.4 — Harrow's Local Plan currently comprises a number of documents: a. — Core Strategy — adopted February 2012 b. — Development Management Policies — adopted July 2013 c. — Harrow and Wealdstone Area Action Plan (AAP) — adopted July 2013 d. — Site Allocations — adopted July 2013 0.0.4 <u>Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements. In addition, the Council has produced supplementary planning documents (SPDs) which provide more clarity on the interpretation and implementation of Local Plan</u> 	Delete existing para 0.0.4, its sub heading and figure and replace with new paragraph 0.0.4 as indicated.

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			<u>policies, to promote sustainable development. The Council will keep under review the need for additional or revised guidance to support the policy implementation.</u>	
AM4	Page 3 Para 0.0.5	0.0.5	The <u>Harrow Local Plan 2021-2041 development plan</u> is accompanied by an <u>adopted Policies Map</u> that illustrates particular land uses and designations throughout the Borough including areas for protection such as open space and conservation areas, as well as employment and residential activities. It also identifies key sites for development ('site allocations'). The development plan also includes the Joint West London Waste Plan (adopted July 2015).	Update para 0.0.5
AM5	Page 5 Para 0.13 -0.0.15 (moved to below 0.0.5)	0.0.13	The Local Plan has incorporates the concept of 'Good Growth,' which underpins the London Plan. This is focussed on ensuring that future growth within London and its boroughs is socially and economically inclusive and environmentally sustainable. Therefore, the objective of Harrow's Local Plan is to help deliver these strategic drivers at a local level, while ensuring that Harrow's unique character is respected and celebrated.	Text of para 0.0.13 – 0.0.15 updated and moved below para 0.0.5 to reflect the progression of the Local Plan and its adoption (if found sound). Paragraph numbering to be updated accordingly.
		0.0.14	Creating a <u>The Local Plan has been produced in requires strong partnerships to be established between with public and private stakeholders and the local communities that they serve. While Harrow Council is taking has taken a leadership role to plan for the borough, it is important this continues to happen this has been</u> in close collaboration with community groups, and local people and businesses to deliver the Local Plan and achieve the best possible outcomes.	
		0.0.15	<u>The Local Plan has been prepared in compliance with the. This planning framework works together to set the parameters for the plan making process. Preparation of the Local Plan must follow nationally set legal and procedural requirements for that inform each stage of the plan-making process stages, processes including the requirements for community and stakeholder consultation, and the information that is required for the document to be found 'sound.'</u> It is critical that Harrow's Local Plan meets the requirements of the London Plan, that its proposals and policies are supported by evidence, and that the policies are deliverable and consistent with national policy. <u>These are set out below.</u>	
AM6	Page 4 Para 0.0.6	0.0.6	The Local Plan <u>policies have been drafted to must</u> be consistent with the National Planning Policy Framework (2023) (NPPF). This sets out the government's planning policies for England and how they should be applied. It must be considered in the preparation of the Local Plan and is a material consideration when making planning decisions. Separate policy documents deal with waste and traveller sites.	Update to text to reflect adoption of Plan (if found sound).
AM7	Page 4 Para 0.0.8	0.0.8	As Harrow is a London borough, it continues to work within the context of a regional spatial strategy (the "London Plan") prepared by the Mayor of London and the Greater London Authority (GLA). The London Plan sets out a framework for how London will develop over the next 20-25 years. The London Plan sets out the Mayor of London's vision for 'Good Growth' and helps ensure a coordinated approach to planning across the capital. The London Plan is supported by several related strategies and Supplementary Planning Guidance (SPG) and London Plan Guidance (LPG) documents that support the its implementation of the London Plan. <u>The current London Plan was adopted in 2021 and the Mayor of London is in the process of undertaking a review of this and an updated Plan is expected to be adopted by 2028. A new London Plan was published on 2 March 2021, replacing earlier iterations.</u>	Update text to reflect the status of London Plan and guidance, and the Mayor of London's intention to update the London Plan.
AM8	Page 4 Para 0.0.10	0.0.10	Alongside the GLA, Harrow Council has <u>worked been working</u> closely with its West London neighbours through the West London Alliance (WLA) to identify strategic priorities for the sub-region – with a focus on	Update to text to reflect adoption of Plan (if found sound).

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		infrastructure – and to develop a shared and common evidence base. In particular, a Joint West London Waste Plan was adopted in July 2015. It is anticipated that a revised plan will be adopted by 2027.	
AM9	Page 4 -5 Para 0.0.12 – 0.15	The need for a new Local Plan 0.0.12 It has been some time since Harrow's current Local Plan was adopted (in 2012/13), and there have been changes in national/regional planning policy and circumstances since then. Most notably this includes an increase in the London Plan housing target for Harrow (see figure below). It is considered that a full review of the current Harrow Local Development Framework documents is required. The updated documents will also reflect recent changes to national policy and any relevant legislative changes. Increase in London Plan target since 2004 Harrow's new Local Plan 0.0.13 The Local Plan incorporates the concept of 'Good Growth,' which underpins the London Plan. This is focussed on ensuring that future growth within London and its boroughs is socially and economically inclusive and environmentally sustainable. Therefore, the objective of Harrow's Local Plan is to help deliver these strategic drivers at a local level, while ensuring that Harrow's unique character is respected and celebrated. 0.0.14 Creating a Local Plan requires strong partnerships to be established between public and private stakeholders and the local communities that they serve. While Harrow Council is taking a leadership role to plan for the borough, it is important this continues to happen in close collaboration with community groups, and local people and businesses to deliver the Local Plan and achieve the best possible outcomes. 0.0.15 This planning framework works together to set the parameters for the plan making process. Preparation of the Local Plan must follow nationally set legal and procedural requirements that inform each of the plan-making stages, processes for community and stakeholder consultation, and the information that is required for the document to be found 'sound.' It is critical that Harrow's Local Plan meets the requirements of the	Delete heading, para 0.0.12 and the graph / heading. Heading for is deleted and Para 0.0.13 – 0.0.15 have been updated and moved above, to reflect progression of the plan.

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		London Plan, that its proposals and policies are supported by evidence, and that the policies are deliverable and consistent with national policy.	
AM10	Page 6, para 0.0.17	0.0.17 The Local Plan sets out the long-term development strategy for the Borough and is one of the Council's most important strategies. It makes provision for new housing, employment and other development needs including infrastructure. It plays a key role in implementing or facilitating many aspects of the Council's Corporate Plan, including flagship actions. The new Local Plan will help ensure that the relevant corporate plan priorities and actions can be delivered in coming years.	Update to text to reflect adoption of Plan (if found sound).
AM11	Page 8, Para 0.0.19	Stage 5 Publication of the Draft Local Plan Proposed Submission (Regulation 19) version for consultation (November 2024- December 2024): Having taken into account the responses from the Regulation 18 consultation and the findings from the Integrated Impact Assessment (IIA), the council will published its Final Proposals in a planning document for a statutory consultation period of six weeks, prior the submission of the Draft Local Plan before it is submitted to the government for examination by an independent inspector from the Planning Inspectorate. We are at this stage in the process. Stage 6 Submission of Local Plan for independent examination along with any representations received at pre-submission publication (Regulation 22-25) (Spring 2025): The Council reviewed, and responded to all representations to the Draft Local Plan (Regulation 19) document). The Draft Local Plan along with its supporting evidence based documents were At this stage, the final draft documents are submitted to the government on 26 February 2025, and an An independent inspector was appointed to examine holds an examination into the soundness of the plan and the associated IIA and evidence on behalf of the Secretary of State. This involves an assessment of the Local Plan against legal and procedural requirements and consideration of the 'soundness' of the plan against four tests (see below). The process included holding a series of hearings over June, July and October 2025. As a result of this process, the Inspector recommended the necessary changes to the Plan (known as Main Modifications) to make it sound or legally compliant; based on matters identified during the examination. Stage 6a Local Plan Main Modifications Consultation: Consultation is undertaken on the Main Modifications recommended by the Inspector for a period of six weeks. 'Additional Modifications' that do not materially affect the soundness of policies (e.g. correction of typographical errors, factual updates to text) can also be identified by the Council. The representations on the Main Modifications are submitted to the Inspector to consider and publish a report with a recommendation on whether the Local Plan is sound and can be adopted, subject to the Main Modifications. The inspector can recommend adoption when the document is considered to satisfy legal requirements and can be considered 'sound.' Stage 7 Adoption by council (Regulation 26) (intended to be by March 2026December 2025): This involves the formal adoption of the Local Plan by the local planning authority.	Text updated to reflect the current Local Plan Main Modification stage of the process. Stage 7 text will be updated to reflect final date of adoption (if plan is found sound).
AM12	Page 8 Para 0.0.20	0.0.20 Further details relating to the timetable for preparing the Local Plan can be found in the council's adopted Local Development Scheme (February 2023). This will be updated in due course if necessary to reflect actual timeframes closer towards submission of the draft Local Plan to Government for examination.	Deleted as it will not be out of date/irrelevant at the time of the adoption of the Plan
AM13	Page 9 Para 0.0.22	0.0.22 Harrow Council is was required to ensure that the Local Plan is was based on appropriate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. In particular, local planning authorities must ensure that their assessment of need and the strategies geared	Update to reflect adoption of the plan (if found sound).

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		to meeting the need for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.		
AM14	Page 9 Para 0.0.23	0.0.23	A robust evidence base enables <u>enabled</u> the preparation of a sound Local Plan. It also provides <u>provided</u> the rationale and justification for how the council has developed its policies and strategies in <u>the Plan</u> emerging local development plan documents , taking into account the latest available information.	Update to reflect adoption of the plan (if found sound).
AM15	Page 9 Para 0.0.24	0.0.24	The Council has worked with the Greater London Authority (GLA) and neighbouring local authorities in West London to share the development and production of the evidence base, where possible, and ensure that emerging findings accorded <u>ed</u> with the duty to cooperate.	Update to reflect adoption of the plan (if found sound).
AM16	Page 9 Para 0.0.26	0.0.26	The preparation of the Local Plan includes <u>included</u> an assessment of how policies could influence sustainability (including environmental, social and economic outcomes) health and equalities. As the assessment covers <u>covered</u> these three different areas, it is <u>was</u> called an Integrated Impact Assessment (IIA). The purpose of the IIA is <u>was</u> to highlight and, where possible, address any undesirable effects that may arise on sustainability (such as the environment, society and economy) or on health or equalities as well as identify opportunities for improvements. All Local Plan policies, including alternative policy options, and site allocations have been <u>were</u> appraised in the IIA.	Update to reflect adoption of the plan (if found sound).
AM17	Page 9 Para 0.0.27	0.0.27	The IIA fulfils <u>fulfilled</u> the statutory requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (Directive 2001/42/EU) and associated UK Regulations. It also fulfils <u>fulfilled</u> the requirements for Health Impact Assessment and Equalities' Impact Assessment. The IIA brings brought different types of assessment together into a single process.	Update to reflect adoption of the plan (if found sound).
AM18	Page 10 Para 0.0.28	0.0.28	A separate Habitats Regulations Assessment (HRA) has also been <u>was also</u> carried out to assess whether protected habitats and species may be adversely impacted by the plan's implementation.	Update to reflect adoption of the plan (if found sound).
AM19	Pages 10-11 Para 0.0.31 – 0.0.34	0.0.31	The Preparation of Harrow's Local Plan was will be informed by extensive consultation and engagement with local communities and other stakeholders. Initial An initial Regulation 18 Local Plan Consultation <u>on an initial draft plan</u> took place over an eight-week period running from 26 th February to 25 th April 2024 <u>and informed revisions to the draft plan</u> . Further details of the responses received and how these were used to inform this Regulation 19 Local Plan document are set out in the Consultation Statement which can be found on the Council's website. A further Regulation 19 Local Plan Consultation on the revised draft plan took place for a period of six weeks between 4th November and 17th December 2024. The representations received at this stage, along with the Council's response to them, were submitted to Government along with the draft plan, for examination.	Text updated to reflect the current Local Plan Main Modification stage of the process,
		0.0.32	Regulation 19 Local Plan Consultation will take place for a period of six weeks between 4th November and 17th December 2024. This will be undertaken using the Council's Local Plan consultation database (email or letter). The draft Plan, supporting documents (i.e. Integrated Impact Assessment) and evidence base will be included on the Council's website. Hard copies of the draft Local Plan and supporting documents will be made available to view at Greenhill Library, and other libraries in the borough. Documents will also be available to view at the Harrow Hub (Council Depot) by appointment. Further details can be found in the 'Statement of Representations Procedure and Statement of Fact' on the Council's website. A final consultation on the 'Main Modifications' identified by the Inspector examining the draft Plan that were required to make the plan 'sound' was consulted on for a six-week period from 10 November 2025 to 23	

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		<u>December 2025. The representations received during this consultation were considered by the Planning Inspector before finalising their report and recommended Main Modifications.</u> 0.0.33 A range of engagement tasks will be undertaken including: (a) Online consultation hub (b) E-newsletter/social media/newspaper adverts (c) Information displays/leaflets/posters at key sites (d) Email address via: Local.Plan@Harrow.gov.uk (e) Attendance at in person events (see website for details). 0.0.33 Full details of the representations received during the various consultation periods and how these informed the adopted plan can be found on the Council's website.	
AM20	Pages 11-12 Paragraphs 0.0.34-0.0.38	0.0.34 The Regulation 19 stage is effectively the public's final opportunity to send in feedback on Harrow's draft new local plan, as this updated version is essentially the version of the plan that the Council would like to see adopted (following the relevant independent examination process). Responses at this stage should be confined to if the plan passes the legal tests and is sound. The tests of soundness include: A. Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development B. Justified – an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence C. Effective – deliverable over the plan period and is based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground D. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant. The London Plan is an integral part of the statutory development plan for the Local Planning authority in Harrow. Harrow's Local Plan must be in "general conformity" with it. 0.0.35 In terms of legal compliance, the Local Planning Authority is required to comply with relevant legislation relating to plan-making including consultation with the statutory environment consultation bodies, undertaking 'Duty to Cooperate' activities and collecting appropriate baseline information etc.	Text deleted as not relevant when the plan is adopted (if found sound).

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		0.0.36 — For further details of the consultation, and how to respond can be found via the Council's website: You can find out more by visiting www.harrow.gov.uk/NewLocalPlan 0.0.37 — Or alternatively email: Local.Plan@Harrow.gov.uk Next Steps 0.0.38 — All representations received will be compiled, reviewed and summarised as part of an updated Consultation Statement and will be considered by the Council in early 2025. The Statement together with the final sustainability report, submission policy map and all other supporting documents will then be submitted to the Secretary of State for the purposes of the Local Plan Examination as part of the next stage of the local plan making process (Regulation 22 Submission stage) in mid 2025.	Scan QR code for more info. 

Chapter 1 – Borough Profile, Spatial Vision, Strategic Objectives and Spatial Strategy

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM21	Page 14 Para 1.1.2	1.1.2 The profile is not intended to be exhaustive, as the draft Plan is <u>was</u> informed by an extensive evidence base and wide range of statistical information.	Update to reflect progression of plan from draft to adoption (if found sound).

Chapter 2 – High Quality Growth

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM22	Page 39 Policy GR2 Supporting Text: Paragraph 2.2.1	2.2.1 This policy also applies both to new development and to secure adaptations to existing buildings through changes of use, conversions, alterations to non-residential buildings and proposals for new shopfronts. Recognising that adaptations to existing buildings are often more challenging, this policy does not apply to householder applications where it might be disproportionate, but it can be followed voluntarily where substantial extensions are proposed. New development must provide accessible homes in accordance with Policy D7 (Accessible Housing) of the London Plan (2021).	Modification to para 2.2.1 to delete unnecessary word.
AM23	Page 40 Policy GR2 Supporting Text: Paragraph 2.2.4	2.2.4 While the design and layout of all development should achieve full integration into the area within which the site is located, major development proposals provide an opportunity to extend inclusive design principles beyond the site boundary to achieve, for example: enhancements to the pedestrian environment and cycle routes between the site and local destinations; the creation of an accessible and integrated public transport network and public realm; and the implementation of appropriate Green Grid projects. All new public realm should be in accordance with Policy GR3 (Public Realm and connecting places). Ensuring that the sustainable transport network is accessible and	Modification to para 2.2.4 to reflect document has been published in its final form.

Ref	Chapter /page/policy number	Additional Modification		Reason for Modification
			inclusive is a priority of the draft Harrow Long Term Transport Strategy (2024) and this includes transport infrastructure such as train and bus stations, and pedestrian and cycle network.	
AM24	Policy GR3 Supporting Text: Paragraph 2.3.4	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 (2024) 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.	Modification to para 2.3.4 to reflect document has been published in its final form.
AM25	Policy GR3 Supporting Text: Paragraph 2.3.33	2.3.33	Specific to ensuring public safety, the design of new development of public realm must set out how appropriate steps have been taken to protect users of the space from terrorist activities. Areas that are designed predominantly for pedestrians can result in an area susceptible to terrorist attack, for example through hostile vehicle. Developments must be supported by a strategy that sets out how counter-terrorism measures are able to be deployed to ensure pedestrian protection, particularly when anticipated to be used for congregation. The use of natural barriers such <u>as</u> trees or appropriate infrastructure such as seating should be considered before purpose-built infrastructure which can appear stark and intimidating in the urban environment.	Modification to para 2.3.33 to include missing text
AM26	Page 67 Policy GR7 Policy only	Policy GR7 External Lighting A. New development should incorporate appropriate external lighting and be designed to mitigate wider harm. Lighting should be: a. appropriate for its purpose and its setting; b. demonstrated to minimise the level of illumination required, glare, angle and light trespass, particularly to mitigate any harm to sensitive receptors such as residential properties, natural habitats and biodiversity (such as priority habitats, species, protected sites, rivers and their corridors), and c. assist in achieving a high standard of secure by design. A-B. Proposals for floodlighting will be supported where it would enhance sporting facilities and would not be detrimental to the character of the open land, the amenity of neighbouring occupiers nor harmful to biodiversity.		Modification to correct typographic error.
AM27	Page 67 Policy GR7 Supporting Text: Paragraph 2.7.1	2.7.1	External lighting can be an important element of new development, depending on its scale and purpose. However, poorly thought out, designed and managed external lighting can result in light nuisance. A lighting strategy for new development should be prepared, which details the requirements of the proposed use and any impacts on the wider area. External lighting that utilises illumination that is significantly brighter than need be for its use, in conjunction with height and angle can lead to light trespass and nuisance to adjoining properties. Specifically, sensitive receiving environments such as residential properties can have their amenity harmed by light trespass due to insufficient cowling or poor angling of lights	Modification to correct typographic error.
AM28	Page 72	2.9.4	Freestanding advertisements frequently add to street clutter and obstructions in the public realm. The Council's preference is for such advertisements to be integrated with the provision of required street furniture, like bus stops or	Modification to correct typographic error.

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
	Policy GR9 Supporting Text, Paragraph 2.9.4	telephone boxes. Free standing Wi-Fi and USB charging docking may be located in town centres and parades. These developments often appear secondary to the internally illuminated advertisement component associated with them, and can appear as incongruous additions to the locality. Care must be taken to ensure an appropriate balance between the primary infrastructure and the ancillary advertisement element. Furthermore, there should not <u>be</u> an over proliferation of such developments, specifically in the context of all other street furniture, which can lead to excessive street clutter.	
AM29	Page 74 Policy G10 Supporting Text, Paragraph 2.10.14	2.10.14 Non-designated <u>open space</u> sites are often publicly accessible, and form what appears to be a left-over piece of land at the end of a row of houses, which was never initially built on as part of a development. Such sites are not prevalent across Harrow, but often appear between the end of row and the back kerb of a highway. New development in close proximity to the highway, must demonstrate that highway safety is maintained in terms of access to and from the highway and appropriate site lines are maintained.	Modification to include text that ensures the supporting text has consistent terminology with the wording within the heading of Policy GR10.
AM30	Page 80 Policy Title GR12	Policy GR12: <u>Delivery of Site Allocations</u>	Modification to title of policy GR12 to provide clarity

Chapter 3 – Historic Environment

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM31	Page 88 Policy HE1 Supporting Text, Paragraph 3.1.1 (b)	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 <u>of</u> 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.	Correction of typo

Chapter 4 – Housing

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
<u>AM32</u>	Page 105 para 4.1.2	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 <u>and lower cost</u> , to provide more	To avoid confusion in terminology with affordable housing

Ref	Chapter /page/policy number	Additional Modification		Reason for Modification
			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.	
AM33	Page 105 Para 4.1.4 (first two sentences)	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, 2024 2). In contrast, the Council has undertaken a Draft Local Housing Needs Assessment (LHNA, 2024 2) to gain an understanding of the required future housing and tenure mix to meet future needs.	Update text to reflect final document
AM34	Page 106 Para 4.1.6 (first sentence)	4.1.6	The LHNA indicates the future need for the size mix for affordable housing is more varied (than market housing) to ensure <u>local needs are addressed</u> this addresses <u>and the units</u> the needs and remains <u>remain</u> affordable for households with a range of incomes.	Correct minor error
AM35	Page 106 Para 4.1.10 (final paragraph)	4.1.10	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 needs.	Correct minor error
AM36	Page 110 Para 4.2.2	4.2.2	This policy sets out an approach to determine proposals to convert large family dwellings 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 <u>low-cost</u> 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.	To ensure consistency in text
AM37	Page 110 Para 4.2.4 (second sentence)	4.2.4	The re-provided family sized flat should preferably be <u>provided</u> on located on the ground floor (or if this is not possible on upper floors), with direct and inclusive access to a rear garden.	Correct error
AM38	Page 114 Para 4.3.2 (last sentence)	4.3.2	Specifically, care must be taken to protect the often much lower density suburban form and <u>manage the</u> potential impact of to car parking provision required for a site or <u>impacts on</u> the wider highway network.	To clarify sentence.
AM39	Page 114 Para 4.3.3	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, <u>garage sites</u> , back gardens <u>land</u> and non designated open spaces amenity areas <u>and</u> to 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 ⁴³ below.	To reflect updated title of policy GR10. Foot note reference deleted.

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM40	Page 114, Footnote 13	¹³ NB: This diagram is based on the old ward boundaries and will be showing the new boundaries in the future Draft Local Plan.	Delete as not accurate.
AM41	Page 116 Para 4.3.8 (last sentence)	4.3.8 Whilst national policy 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.	Factual update to reflect new NPPF and to reduce risk of reference becoming outdated
AM42	Page 123 Para 4.4.5 (first sentence)	4.4.5 A significant number of homes are needed to meet the Harrow's affordable housing needs of the Borough.	Modification to correct typographic error
AM43	Page 123 Para 4.4.6	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 proposals must provide a minimum of 35% 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 <u>where</u> a 50% threshold level for affordable housing applies, unless there is a <u>an</u> agreement with the Mayor on a portfolio of public sector sites where 35% threshold applies on individual sites and at least 50% across them. <u>4.4.7</u> The affordable <u>housing</u> 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. <u>4.4.8</u> 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.	Modification to correct typographic errors. New paragraph breaks to assist in readability. Paragraph numbering to be updated accordingly
AM44	Page 125 Para 4.4.11 (second last paragraph)	4.4.11 For schemes where affordable <u>housing provision</u> is below threshold levels, it will as a minimum seek 70% of this will be sought the affordable provided as London Living Rent equivalent.	Modification to correct typographic errors
AM45	Page 135 Para 4.6.1	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 <u>2022-32</u>. <u>4.6.2</u> However, it should be emphasised the <u>The</u> 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 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	Minor update and correction of typo. New paragraph breaks to assist in readability. Paragraph numbering to be updated accordingly

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
		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. <u>4.6.3</u> 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.	
AM46	Page 143 Para 4.7.3, sub-paragraph (c)	(c) Adults with learning difficulties/autism: It is estimated that there will be an increase in 155 people with leading <u>learning</u> difficulties/autism by 2032. It suggests this need should be addressed via rented supported housing (120) and shared lives accommodation (35).	Modification to correct typographic error
AM47	Page 147 Para 4.8.3 (first sentence)	4.8.3 The Draft Local Housing Needs Assessment (LHNA, <u>2024</u>) indicates the Borough does not have a high student population compared to other areas within London and it is common for students to attend a University <u>university</u> in one Borough and reside in another.	Minor update to text to reflect final document. Correction of minor typo.
AM48	Page 159 Para 4.10.3 (first sentence)	4.10.3 HMOs can provide a valued source of low-cost 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.	Minor update to avoid confusion in terminology with affordable housing
AM49	Page 163 Para 4.10.16 (last sentence)	4.10.16 It should be emphasised that National Policy has strengthened the test for introducing an article 4 direction and limits its geographic scope. It indicates <u>their use should be limited to situations where they are 'necessary to protect local amenity or well-being of the area' and 'be based on robust evidence, and apply to the smallest geographical area possible' (NPPF 2023, paragraph 53).</u> this should "be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area; be based on robust evidence, and apply to the smallest geographical area possible" (Para 52, NPPF 2023).	Factual update to text
AM50	Page 164 and 165 Para 4.11.1 (first paragraph)	4.11.1 This type of development can provide a <u>lower cost</u> more affordable route to home ownership than other options available, such as 'built for sale' market housing.	Minor update to avoid confusion in terminology with affordable housing
AM51	Page 166 Para 4.11.8	4.11.8 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.	Delete out of date text
AM52	Page 168 Para 4.12.1	4.12.1 The National Planning Policy for Traveller Sites (2015 <u>2024</u>), 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.	Minor factual update

Chapter 5 – Local Economy

Ref	Chapter /page/policy number	Additional Modification		Reason for Modification
AM53	Page 172 Policy SP04; Supporting Text, 5.0.1	5.0.1	Across Harrow, employment land is predominately located within designated town centres, local neighbourhood parades, and across industrial land (SIL/LSIS/undesigned 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 <u>Plan</u> , but also job creation across the wider borough.	Modification to delete unnecessary word and typographical error.
AM54	Page 172 Policy SP04; Supporting Text, 5.0.4	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 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).	Modification to delete unnecessary text and assist in clarity of guidance within the supporting text
AM55	Page 175 Policy SP04; Supporting Text, 5.0.16	5.0.16	Strengthening Harrow town centre and maintaining or enhancing the viability and vitality of the borough's hierarchy of town centres and neighbourhood parades is a key priority of the Council's draft Long Term Transport Strategy <u>(2024)</u> as it promotes sustainable transport options.	Modification to update evidence base as now adopted.
AM56	Page 181 Policy SP05. Supporting Text, Paragraph 5.0.35	5.0.35	Proposals for Built to Rent developments are likely to be acceptable within the boundaries of the Opportunity Area and the District Town Centres, subject to compliance with other policies of the Development Plan. These locations provide good access to public transport, local services, facilities and pursuing employment opportunities. This will encourage increased sustainable modes of transport, reduce car use and the risk of increased on-street car parking in the surrounding area. Build to rent schemes accommodate a minimum of 50 units (or more) and require the delivery of a significant quantity of units; to benefit from economies of scale and fund the cost of managing and operating the development. Therefore build to rent schemes on smaller sized sites, particularly outside of the above proposed locations (. i.e. suburban areas) would require development to be built at a high density on 4 or more storeys, in order to ensure viability. This would be contrary to the predominate character of the Borough <u>which</u> is two - three storey in suburban locations and three to four storeys with the town centres and near transport hubs, which means locations outside of the Opportunity Area and District Town Centres are not likely to be suitable for Build to Rent D developments. Overall, the proposed policy approach will minimise any potential harmful effects on the character areas of the Borough and ensures viability of potential development proposals	Modification to correct minor typos
AM57	Page 188 Policy LE1. Supporting text, Paragraph 5.1.8	5.1.8	The Council will continue to monitor the use of premises within the designated town centres and parades. Specifically, the Council will have particular regard to Sui Generis uses. Whilst Sui Generis uses can provide choice and contribute to the vitality and viability of a town centre, some uses can have a negative impact, in particular to the health and wellbeing of visitors (such as betting shops, casinos, pawn shops, shisha bars and some food outlets). The Council <u>may</u> explore and seek to implement where considered appropriate the use of Article 4 Directions to ensure the vibrancy and vitality of town centres and parades along with achieving appropriate broader health and wellbeing outcomes.	Modification to add missing word

Ref	Chapter /page/policy number	Additional Modification		Reason for Modification
AM58	Page 189 Policy LE1. Supporting text, Paragraph 5.1.13	5.1.13	Neighbourhood parades are located outside of the designated town centres and provide a valuable resource for much of suburban Harrow. Neighbourhood parades have the ability to provide day-to-day amenities contributing to sustainable neighbourhoods and assisting in the modal shift to more sustainable transport modes. The loss of these assets across the borough results in residents needing to travel further to collect day to day convenience goods, which can lead to further use of the private motor vehicle, especially from parts of the borough less connected to public transport. The loss of employment, cultural or leisure uses from such a location will only be supported where there has been 24 months of appropriate marketing <u>in accordance with the guidance set out within Appendix 6</u> , and alternative non-residential uses have been explored. Marketing should reflect the type, use and size of floorspace, seeking replacement operators and then other uses appropriate for town centres or neighbourhood parades	Additional modification to provide consistency and reference to Appendix 6
AM59	Page 189 Policy LE1. Supporting text, Paragraph 5.1.14	5.1.14	Residential use is a more permanent use within a site, with the ability to return a premise to a non-residential use is highly unlikely to occur. Residential uses at ground floor within neighbourhood town centres and parades will not be supported <u>where this is carefully managed to ensure limited loss of frontage and floorspace</u> , as this sends the clearest signal that the parade is in decline and all attempts to revive it have been abandoned.	Modification to paragraph 5.1.14 to ensure consistency with Policy LE1.D and to provide an effective policy
AM60	Page 190 Policy LE1. Supporting text, Paragraph 5.1.20	5.1.20	Marketing undertaken as required by this policy must be robust and proportionate and cover a period <u>in accordance within the guidance set out in Appendix 6</u> of no less than 12 months , that accurately reflects market rates suitable for the type use and size of the particular floorspace. In most instances marketing will be tested independently by a suitably qualified professional.	Additional modification to provide consistency and reference to Appendix 6
AM61	Policy LE4 Supporting Text. Paragraph 5.4.1	5.4.1	Cultural facilities are essential infrastructure that make up an important element of any place. Harrow has a wide range of assets that are of cultural importance, many of which are associated with the built environment and natural landscapes. Many of the heritage assets in Harrow, such as St Mary's Church atop Harrow on the Hill, are very prominent with views to it from many parts of the Borough. Many others have a more local connection. To the north-east of the Borough, Harrow Weald provides a vantage point across the Borough. These locations are designated as Areas of Special Character, and provide culturally important assets for the Borough. Proposals that may impact on Area of Special Character must consider Policy HE3 of the Local Plan.	Modification to reflect proposed deletion of Areas of Special Character / policy (GR6).

Chapter 6 – Social and Community Infrastructure

Ref	Chapter /page/policy number	Additional Modification		Reason for Modification
AM62	Page 212 Policy SI1 (previously CI1): Supporting text Paragraph 6.1.4	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 <u>the</u> 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.	Minor addition to improve the readability of paragraph 6.1.4

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM63	Page 213 Policy SI1 (previously CI1): Supporting text Paragraph 6.1.7	6.1.7 The Council is working with faith groups to identify burial space to suit their needs. A needs assessment has been undertaken to identify burial space requirements over the plan period and work to identify sites for burial space expansion is ongoing. The Council will continue to engage through Duty to Cooperate meetings with other boroughs, highlighting West London burial space needs as a consideration. Proposals for new burial sites in the meantime would be assessed against the criteria in this policy to the extent that they are relevant to such a use, as well as any other applicable policies relating to the specific site or proposal.	Reference to the duty to cooperate is not required for the adopted plan.
AM64	Page 214 Policy SI2 (previously CI2) Supporting text Paragraph 6.2.3	6.2.3 Play space should be delivered on-site. Proposals for Off-site provision will only be considered in exceptional circumstances where it is demonstrated; on-site provision is not feasible and there is existing play space, or new provision will be delivered within proximity to the development and can be accessed safely, easily by residents. Applicants will be required to provide evidence to demonstrate that delivery on-site is not feasible, including a design options appraisal, and assurance that the need generated by the development will be adequately met.	Deleted text is contained in the policy
AM65	Page 217 Policy SI3: (formerly CI3) Supporting text Paragraph 6.3.3(a)	6.3.3 The Strategy identifies key objectives and local needs (current and projected to 2037), including: (a) The need to replace or improve existing Leisure leisure and recreation facilities; (b) Additional pressures arising from a growing, ageing and changing population;	Correction of typographical error
AM66	Page 218 Policy SI3: (formerly CI3) Supporting text After paragraph 6.3.8	Delete Leisure facilities map and heading	No longer needed / was for consultation purposes only
AM67	Page 219 Policy CI4: Digital and Communications Infrastructure	Policy <u>SCI4</u>: Digital and Communications Infrastructure A. Proposals for the installation of telecommunications equipment will be supported where: a. The installation would be on an existing mast or building or, if a new mast is proposed, it has not been possible to find a suitable existing mast or building to meet operational requirements; b. The siting and design of the installation would minimise its impact upon the amenity of neighbouring occupiers, the host building (where relevant), and the appearance and character of the area; <u>and</u> c. There would be no unacceptable impact upon areas of designated open space, heritage, landscape and biodiversity value. B. Where installation of telecommunications infrastructure is required to support the effective functioning of the emergency services, compliance with A. above may not be feasible. These applications will be determined on a case by case basis, based on evidence submitted by the applicants. C. Existing communications infrastructure (i.e. masts, cabinets, aerials, etc) and sites must be utilised where possible to minimise over proliferation of equipment. Any grounds for rejecting co-location of infrastructure or sites must be clearly justified	Update to policy reference to reflect overall change to Chapter heading, Add 'and' after Ab.
AM68	Page 220 Policy SI4: (formerly CI4) Supporting text,	6.4.5 Development proposals must demonstrate how they will improve digital connectivity on sites located in areas where full-fibre broadband, or equivalent infrastructure, is not currently available or on sites that are otherwise poorly served by broadband coverage, including in designated employment areas and town centres. Proposals must address the findings of Harrow's Infrastructure Delivery Plan <u>IDP</u> .	Use of abbreviation for Infrastructure Delivery Plan

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
	Paragraph 6.4.5		

Chapter 7 – Green Infrastructure

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM69	Page 237 Policy GI1, Supporting text Paragraph 7.1.9	7.1.9 Biodiversity improvements on MOL of or Green Belt land will be encouraged in line with Policy GI4 (Biodiversity) and must be a consideration for all forms of development. Harrow's two Sites of Special Scientific Interest and the majority of the Borough's Sites of Importance for Nature Conservation (SINC) are located in the Green Belt, contributing to the character, openness and biodiversity value of the area. Food growing (allotments) and community gardens will be encouraged on MOL and Green Belt land.	Correction of typographical error
AM70	Page 235 Policy GI4, Part F	F. Where there is an unavoidable loss of trees <u>on site</u> , replacement trees will be required to be planted on site where appropriate at a rate of at least two new trees for each tree lost. Where this requirement cannot be met on site, financial contributions will be sought for offsite provision of any shortfall.	Correction of typographical error
AM71	Page 239 Policy GI5, Supporting text Paragraph 7.5.3	7.5.3 Allotments are particularly invaluable <u>valuable</u> to those who do not have access to a private garden, helping to promote inclusivity in the community. For this reason, the inclusion of allotments and community gardens is heavily encouraged in new developments to provide residents with a meeting place to interact.	Correction of typographical error

Chapter 8 – Responding to the Climate and Nature Emergency

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM72	Page 242 Policy SP08, Part A, (h)	Change notation of sub parts of (h) from numbers to roman numerals	Numerals provide a more appropriate referencing system for this part of the policy
AM73	Page 247 Policy CN1, Supporting text Paragraph 8.1.5	8.1.5 High standards of sustainable design are expected of all developments, including new development, retrofit, conversion and refurbishments. All development should aim to make effective use of resources and materials, future proofing for increased efficiency and reuse of materials where possible. Sustainability, including water efficiency and embodied carbon in buildings, should be considered early in the design process in order to maximise energy and carbon savings, and minimise construction and operational costs.	Delete 'in order' to improve readability
AM74	Page 255 Policy CN3, Supporting text Paragraph 8.3.5	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.	Delete as paragraph is not required as it repeats requirements of the NPPF and London Plan

Ref	Chapter /page/policy number	Additional Modification		Reason for Modification
AM75	Page 255 Policy CN3, Supporting text Paragraph 8.3.6	8.3.6	The West London Strategic Flood Risk Assessment (SFRA) ¹ 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 forms a principal component of the evidence base that underpins planning policies and site 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.	To improve the readability of the paragraph
AM76	Page 256 Policy CN3, Supporting text Paragraph 8.3.12	8.3.12	Some of the Borough's open spaces contain river corridors and form a part of the functional flood plain. The modelled flood extents illustrated on Harrow's flood maps represent the best available information about the strategic risk of flooding. Consideration must be given to areas within the functional floodplain, which represent the most frequent and serious risk of flooding.	Paragraph split into two to improve readability.
		8.3.13	The NPPF requires Local Plans to identify Flood Zones (3b). Harrow has made a distinction between Greenfield Zone 3b (undeveloped) and Developed Zone 3b (previously developed i.e a town centre). Undeveloped floodplain, defined as Flood Zone 3b within areas designated as Green Belt, Metropolitan Open Land or open space on the Policies Map, is of particularly high value within the urban context. It provides unimpeded space where water is able to flow or be stored during times of flood. However, much of the Borough is already urbanised with many rivers culverted, changing their behaviour in response to rainfall and flooding. Previously developed land within the floodplain, defined as Developed Flood Zone 3b on land not designated as Green Belt, Metropolitan Open Land or open space on the Policies Map, provides opportunity through development to realise flood risk management and reduction objectives outlined in this policy.	
AM77	Page 258 Policy CN4, Supporting text Paragraph 8.4.6	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.	Delete sentence that refers to the fact comments were received from Thames Water during the preparation of the plan; this fact is not required for the adopted version of the plan.
AM78	Page 261 Policy CN5, Part C	Policy CN5: Waterway Management A. Development proposals should seek to maximise the multifunctional social, economic and environmental benefits of rivers and waterways. B. The design and layout of development on sites where there is a main river or ordinary watercourse within, adjacent to or abutting the site boundary will be required to maintain an undeveloped buffer zone of 8 metres either side of		To ensure policy is coherent and effective

¹ <https://westlondonsfra.london>

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
		a main river (from the top of the riverbank/flood defence/culvert), 5 metres either side of an ordinary watercourse, or an appropriate width as may be agreed by the Environment Agency or Council LLFA. C. Applications for major development on sites containing a main river or ordinary watercourse within the site boundary will be required to: E. <u>a.</u> Have regard to the relevant provisions of the Thames River Basin Flood Risk Management Plan²; <u>ab</u> Investigate and, where necessary, secure the implementation of environmental enhancements to open sections of river or watercourse; and <u>bc</u> Investigate and, where feasible, secure the implementation of a scheme for restoring culverted sections of river or watercourse which must include an adequate buffer for flooding and maintenance purposes. D. Where on-site enhancements or deculverting are financially viable but not feasible, the Council will seek a financial contribution towards relevant other projects for the enhancement or deculverting of other sections of the river or watercourse. E. Proposals that would adversely affect the infrastructure of main rivers and ordinary watercourses, or which would fail to secure feasible enhancements or deculverting, will be refused.	
AM79	Page 262 Policy CN5, Supporting text Paragraph 8.5.2	8.5.2 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 aims to improve the condition inter alia of surface waters including rivers and lakes having regard to biological, physical and chemical qualities. To contribute to the objectives of the Directive, any activities or developments within an area of river, watercourse or water body must not cause deterioration and should enhance the condition of the river, watercourse or water body. Specifically, activities and developments should promote sustainable water use, reduce pollution and achieve 'good ecological status or potential'. The Council seeks to reinforce the Thames River Basin Management Plan seeks to ensure that there is no deterioration in the ecological status of any WFD waterbody or associated elements caused by development in the borough. The Borough's network of main rivers and ordinary watercourses are mapped in the West London Strategic Flood Risk Assessment (2018 Live).	Corrected grammatical and typographical errors

Chapter 9 – Managing Waste and Supporting the Circular Economy

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM80	Page 264 Policy SP09, Part A (c)	Require all new M major development to address waste management at all stages of a development's life from the design and construction stages through to the end use and activity on site. This will ensure all waste is managed towards the upper end of the waste hierarchy;	Typographical error corrected
AM81	Page 268 Policy CE1, Supporting text Paragraphs 9.1.5 and 9.1.6	9.1.5 Details surrounding acceptable bin sizes, types and standards can be found on the Council's webpage where bins can also be ordered and fixed. Alternatively, applicants can contact the Council's Environmental Services department for advice. 9.1.6 Furthermore, all A development should respond to waste management guidance set out in the NPPF, London Plan and Re:London guidance.	Paragraphs combined to improve readability

² (Thames River Basin District Flood Risk Management Plan 2021 to 2027 (publishing.service.gov.uk))

Chapter 10 – Transport and Movement

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM82	Page 273 Policy SP10 Supporting text Paragraph 10.0.4	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).	Paragraph provides contextual data that will go out of date as the plan moves through its lifecycle and could be deleted.
AM83	Page 282 Policy M2, Supporting text Paragraph 10.2.2	Delete Public Transport Accessibility Levels (PTAL) heading and map below this.	Map was included for illustrative purposes during the preparation of the plan and consultation on it. It will however become out of date as the plan progresses through its lifecycle
AM84	Page 283 Policy M2, Supporting text Paragraph 10.2.6	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.	Delete paragraph as not necessary to repeat purpose of the London Plan or NPPF
AM85	Page 284 Policy M2, Supporting text Paragraph 10.2.10	10.2.10 Applicants should provide detailed Parking Design and Management pPlans 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.	Correction of typographical error
AM86	Page 285 Policy M3, Supporting text Paragraph 10.3.4	10.3.4 Since the pandemic there has been an increase in online shopping and home deliveries leading to <u>an</u> 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.	Correction of typographical error
AM87	Page 286 Policy M3, Supporting text Paragraph 10.3.5	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 role of, and opportunities for, shared consolidation facilities for deliveries and <u>servicing including micro consolidation hubs</u> as a means of minimising vehicle movements, reducing overall levels of congestion and improving road safety.	Delivery and Service Plan Guidance is now referred to in earlier paragraphs

Chapter 11 – Site Allocations

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
AM88	Page 288 Paragraph 11.1	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 it 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.	Current wording is unclear. Paragraph 11.2 is combined with 11.1 above to improve readability.
AM89	Page 289 Paragraph 11.8	11.8 Sites were only considered for allocation if they had an area of at least 0.25ha or were proposing to deliver at least 10 housing units or 500sqm of additional employment floorspace. Sites which did not meet these criteria were not considered to be sufficiently large and so did not merit site allocation (but are likely to come forward as 'windfalls'). Existing allocations were excluded from further consideration if had been delivered or were expected to be delivered by the commencement of the Plan.	Correction of typographical error – additional bracket added after windfalls
AM90	Page 289 - Paragraphs 11.9 – 11.14	Site assessment and selection 11.9 A full assessment of site suitability was carried out to obtain a full picture of site suitability and to select the most suitable sites for allocation. The following criteria were used to exclude sites from allocation (although additional criteria would have been used if sites had significant constraints, larger impacts or significant contraventions of other policies). Sites excluded for these reasons contravene draft Local Plan policies which have been tested against reasonable alternatives during the local plan process and through integrated impact assessment (IIA): (a) Sites in the Green Belt or Metropolitan Open Land were excluded, as development would be inconsistent with the London Plan and Council's draft Local Plan. In addition, as Council's housing target as set in the London Plan (and carried forward for the full plan period) is capable of being met through proposed allocations, the development pipeline (under construction or with planning permission) and a windfall allowance, exceptional circumstances were considered not to exist to justify allocation of these sites. (b) Sites which are Designated Open Space were excluded, as development of these sites would be contrary to the draft Local Plan and has the potential to decrease access to open space in the Borough. (c) Sites with industrial land designations or in industrial use were excluded if they are not on the edge of a designated employment area or a stand-alone site, and if development would not deliver improved or better functioning employment space. 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: Delivery of Site Allocations. 11.12 A comprehensive assessment of each site selected for allocation was carried out through evidence base documents, specifically the Integrated Impact Assessment, Level 2 Strategic Flood Risk Assessment (SFRA), Infrastructure Delivery Plan and Local Plan Viability Study. This did not result in exclusion of any further sites, but did influence development considerations and requirements as set out in the final site allocations. 11.13 In terms of the flood risk requirements of the NPPF, the site selection process demonstrates that it is not possible to fully meet the development needs of the borough solely within areas with a lower risk of flooding (taking into account wider sustainable development objectives) i.e. the sequential test. Consequently, it has been necessary to apply the exception test outlined in the NPPF. 11.14 In this regard, the site selection process itself [as well as the Integrated Impact Assessment (IIA)] of the proposed site allocations demonstrate that any the proposed site allocations subject to flood risk will provide wider sustainability	Delete paragraphs 11.9-11.14 as explanation of site selection is not required for the adopted plan

Ref	Chapter /page/policy number	Additional Modification	Reason for Modification
		benefits to the community / Local Plan (including contribution to meeting development needs) that outweigh the flood risk. Furthermore, the Level 2 SFRA demonstrates that the proposed allocations / uses will be safe / can be made safe, having regard to the vulnerability of the proposed uses and the level of flood risk. Therefore, the proposed site allocations meet both elements of the exceptions test.	

AM91: Additional Modifications (relating to grammar / consistency) to be made to document prior to adoption (if found sound)

The table below identifies the conventions that will be used to review / proofread the draft Local Plan prior to adoption. These do not relate to matters of soundness and are considered presentational only.

Issue	Proposed approach
Inconsistent use of hyphens in document – site -specific, well-designed	Remove hyphens
Inconsistent uses of upper and lower case text in sub criteria	Each sub criterion starts with upper case
Inconsistent use of semi colons and commas at the end of sub criteria in policies	Semi colon (;) at the end of each sub criterion ; and at the end of penultimate criterion
Inconsistent use of i.e. and e.g. in document (i.e./i.e e.g./e.g)	Use i.e./e.g. throughout
Inconsistent use of upper case when referring to the Council (Council/council)	Use upper case when referring to LBH as ‘the Council’
Inconsistent use of upper case when referring to the Borough (Borough/borough)	Use upper case when referring to LBH as ‘the Borough’..
Reference to The London Borough of Harrow in policies and supporting text	Avoid this reference unless necessary – generally stick to ‘The Council will...’
Check footnotes	Ensure footnotes run sequentially
Check paragraph numbering	Ensure paragraph numbers run sequentially
Long paragraphs	Split paragraphs that are more than 4 or 5 sentences/6 or 7 lines where appropriate
Inconsistent use of upper case when referring to Local Plan (Local Plan/local plan)	Use upper case
Grammatical error when using ‘which’ in sentences/which will/that will	Generally better to use comma before which in sentence Which will/that will – better to use ‘that’ if possible
Use of American spellings – optimize, maximize	Ensure English spellings are used throughout
Reference to ‘Gypsy and Traveller’ matters	Ensure Gypsy and Traveller is upper case
Reference to District Centre/district centre	Ensure upper case throughout
Use of ‘sqm’ as shorthand for square meters	Add space after figure – 50 sqm
Inconsistent use of floodrisk/flood risk	Ensure this appears as two words throughout
Inconsistent use of carpark/car park	Two separate words throughout
Inconsistent font size in site allocations tables	Ensure consistent size and style throughout – 11 pt
Use of & in text	Use ‘and’ rather than &
No need to use comma before ‘and’ in sentence	Delete as necessary, avoid ‘, and’
Inconsistency in capitalisation between defined terms and the glossary	Review to ensure consistency within the body of the plan and with the glossary.