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Dear whom it may concern

**Response to London Borough of Harrow's Local Plan – Harrow Local Plan 2021-2041: Schedule Of Proposed Modifications Following Hearing Sessions: November 2025**

In addition to the comments on Harrow's Main Modifications set out below, The London Borough of Barnet (LB Barnet) wishes to confirm that certain key points raised in its Regulation 19 response remain relevant.

These include:

- The need for support and endorsement of the Edgware Growth Area SPD, which has been jointly prepared by LB Barnet and the London Borough of Harrow, (LB Harrow) as this framework is essential for coordinated growth and infrastructure delivery.
- The importance of LB Barnet and other neighbouring boroughs being kept informed and consulted during the design and application stages for site allocations with potential cross-boundary impacts, particularly where proposals may affect strategic routes and already pressurised transport capacity.

**Site allocations**

LB Barnet note the amendment of "*indicative capacity*" being replaced with "*minimum capacity*", in MM80 (Site GB2) Watling Farm, MM100 (Site Ref O20) Canons Park Station Carpark, and MM102 (Site Ref. O22) Stanmore LU Station. While LB Barnet have no objection to this, we wish to highlight that this further strengthens the need for consultation on proposals, as actual capacity could exceed the specified totals. This is particularly important as there remains concerns about capacity at some key junctions that affect LB Barnet, namely A410 and A5

Please note our comments on individual sites below (suggested wording and deletions by LB Barnet noted in red).

## Specific Sites

### MM79 - Royal National Orthopaedic Hospital (RNOH) (Site Ref. GB1)

Under the section 'Development principles', the modification removes any indication of capacity due to a lack of evidence base and introduces additional wording requiring new development to contribute 'to active travel routes and access to public transport to improve connectivity'– LB Barnet supports this change.

### MM80 - Watling Farm (Site Ref. GB2)

Under the section 'Development principles', the modification now adds an increase of at least one additional pitch (an increase from 12 to 13 pitches). LB Barnet would also like to see similar wording for Watling Farm that has been introduced for RNOH given its low PTAL. This would incorporate the following:

*'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'*

### MM100 - Canons Park Station Carpark (Site Ref O20)

The modification now adds an increase of at least 12% (an increase of 26 to 29 units). Although the site is under three quarters of a mile from the junction with A5, the proposal could still have consequential impacts on Barnet Roads. Therefore, LB Barnet suggests the following amendments to the section '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.~~ In accordance with London Plan policy T6, as the site is well-served by public transport the starting point should be that any development will be car free for occupiers. Any planning application for the redevelopment of the site should be supported by evidence of public car parking demand and show how ~~that~~ demand will be ~~met~~ addressed in ways that take account of London Plan policy by the retention or re-provision of the minimum necessary car parking capacity on the site or elsewhere. Any car parking will need to be in accordance with Local Plan Policy M2B.'

### MM102 - Stanmore Station Carpark (Site Ref. O22)

The modification now adds an increase of at least 9% additional units (183 to 199 units). The site is less than half a mile from Canons Corner, where the borough boundary runs down the middle of the A5. Additional traffic generated could worsen conditions at this junction, with potential knock-on effects on the A5 and A410 in Barnet.

LB Barnet recommends that the relevant paragraph of the allocation be amended to read:

*'The site is suitable for partial residential development with re-provision 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. In accordance with London Plan policy T6, as the site is well-served by public transport the starting point should be that any development will be car free for occupiers. Any planning application for the redevelopment of the site should be supported by evidence of public car parking demand and show how ~~that~~ demand will be ~~met~~ addressed in ways that take account of London Plan policy by the re-provision of the minimum necessary car parking capacity on the site or elsewhere. Any car parking will need to be in accordance with Local Plan Policy M2B.'*

This amendment ensures consistency with London Plan Policy T6 and T6L, which require car-free development in well-connected locations and limit reprovision of parking to the minimum necessary. It also addresses potential traffic impacts on the A5 and A410 near the borough boundary and promotes sustainable transport improvements, aligning the allocation with Harrow's own approach for similar sites

### **Spatial strategy deleted**

LB Barnet notes the deletion of the Spatial Strategy (MM4) and that relevant sections have been reintroduced under Spatial Objectives (MM2). However, references to partnership working with neighbouring boroughs have been removed and not reinstated.

While MM2 wording focuses on Harrow's internal objectives, it does not currently reference joint working with neighbouring authorities. Including such commitments would strengthen the approach, as LB Barnet previously highlighted the importance of demonstrating collaboration within both the Spatial Strategy and individual policies. Cross-boundary working is a key element in delivering strategic growth and infrastructure effectively.

### **Transport**

LB Barnet welcomes MM54 and the amendments to Policy M1 Sustainable Transport and additional supporting text (2.0.12, 10.1.17–10.1.19) on transport improvements, including walking, cycling, and public transport infrastructure. These provide reasoned justification for enhancements to the public transport network.

This is also reflected in MM2 and supporting text 1.1.15–1.1.16

### **Parking**

LB Barnet notes MM55, Policy M2 Parking, which states that the loss of existing public car parking should be managed based on '*an agreed local parking strategy*'. It also states that '*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 town centre vitality and viability*'. However, this provision currently only applies to Metropolitan and District centres or at strategic public transport, culture, or leisure nodes

While Burnt Oak District Centre would be covered under this provision, Major Town Centres such as Edgware are excluded, despite their significant role in serving large catchment areas and supporting substantial retail, leisure, and employment functions.

LB Barnet requests that Major Town Centres be included to ensure Edgware Town Centre - shared with LB Harrow is also subject to this policy.

This would ensure that any withdrawal of car parking provision by LB Harrow at Edgware Town Centre is planned for, allowing a centre-wide approach to be taken. This would avoid placing additional demand on car parking provision within LB Barnet and maintain the vitality and accessibility of these key centres.

LB Barnet looks forward to continued engagement on these matters.

Yours faithfully



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