

Planning Policy Team
London Borough of Harrow
Forward Drive, Harrow,
HA3 8FL

Date: 23 December 2025

Email: LocalPlan@Harrow.gov.uk

Dear Planning Policy Team,

Re: Harrow Local Plan – Consultation on Proposed Main Modifications

Thank you for consulting us on the above proposed main modification to the draft Harrow Local Plan 2021-2041.

Having reviewed the submitted information, we have the following comments to make on environmental considerations within our statutory remit. The comments are divided into:

- Proposed Main Modifications
- Proposed Additional Modifications
- Updated Integrated Impact Assessment (IIA)

Environment Agency Engagement and Duty to Cooperate

We were consulted on the draft Harrow Local Plan Regulation 18 consultation in February 2024 and responded in April 2024, raising concerns around the absence of an updated Strategic Flood Risk Assessment and lack of policies related to water resources and contamination/groundwater protection.

We were later consulted on a Regulation 19 consultation for the above draft local plan in November 2024 and responded in December 2024, raising soundness concerns regarding the lack of a contamination/groundwater protection policy and the lack of a robust flood risk policy.

Later in April 2025, after extensive engagement, we signed a Statement of Common Ground (SoCG) with the Local Planning Authority (LPA) that included the LPA's response to our comments and a way forward to resolve the soundness concerns expressed in the above representation.

Based on the above, we note that London Borough of Harrow under the duty to cooperate, has engaged with the Environment Agency (EA) to overcome our concerns and incorporate our representation to their local plan through these main modifications.

We note that the soundness concerns shared in our previous response have been overcome through these main modifications.

Proposed Main Modifications

Please see our comments on the proposed main modifications to the Harrow Local Plan 2021-2041, as outlined in the Schedule of Proposed Modifications Following Hearing Sessions (Ref: LBH/ED30).

Please note we have only provided comments on main modifications relevant to our remit and previous comments.

MM Ref.	Page No.	EA Comments
MM6 – Policy GR1	11	We are pleased to see the inclusion of rivers and riparian zones in clause B(c) of this policy.
MM46 – Policy SP08	98	We are pleased to see the inclusion of clause (i) (groundwater and land quality) in this policy and note that this overcomes relevant concerns shared in our Regulation 19 representation.
MM49 – Policy CN3	101	We welcome the inclusion of clauses B (e and f) to this policy. We note that this overcomes our relevant concerns shared in our Regulation 19 representation. While we are disappointed to see the shift from ‘must’ to ‘should’ in this policy, we note that this is unlikely to impact on the soundness of this policy.
MM50 - Policy CN4	103	We are pleased to see the amendments made to clause H of this policy and paragraph 8.4.12 of the supporting text. We note that our previous comments have been taken onboard in line with the SoCG.

Proposed additional modifications

We appreciate the council’s approach to improving the local plan through these additional modifications but have no further comments to make at this stage.

Integrated Impact Assessment (IIA)

We have no further material comments to make to the updated IIA (Ref: LBH/ED31). However, we note that reference to the requirements on an 8-metre buffer zone have now been included in the IIA as agreed as part of the SoCG.

Final comments

Thank you again for seeking our representation on the proposed main modification to the draft Harrow Local Plan 2021-2041. We trust that the comments presented in

this letter are clear and informative and would welcome the opportunity to meet with you to discuss in more detail any issues or queries you may have.

Should you have any queries regarding this response or require additional information or guidance on any of the points raised, please do not hesitate to contact me.

Yours sincerely,

Mohammad Ahmed
Planning Specialist

