
Report to the Council of the London Borough of Harrow

by C Masters (MA) Hons FRTPI

an Inspector appointed by the Secretary of State for Housing, Communities and Local Government

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Planning and Compulsory Purchase Act 2004 (as amended)
Section 20

Report on the Examination of the Harrow Local Plan 2021 - 2041

The Plan was submitted for examination on 26 February 2025

The examination hearings were held between Tuesday 24 June and Tuesday 15 July 2025. An additional hearing was held virtually on Monday 13 October 2025.

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Abbreviations used in this report

BNG	Biodiversity Net Gain
DtC	Duty to Cooperate
GLA	Greater London Authority
GTANA	Gypsy and Traveller Accommodation Needs Assessment
HMO	House in Multiple Occupation
HRA	Habitats Regulations Assessment
HWOA	Harrow & Wealdstone Opportunity Area
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
LSPBSL	Large Scale Purpose Built Shared Living
LDS	Local Development Scheme
LSIS	Locally Significant Industrial Site
MoL	Metropolitan Open Land
MM	Main Modification
NPPF	National Planning Policy Framework (the Framework)
PPG	Planning Practice Guidance
PPTS	Planning Policy for Travellers
PTAL	Public Transport Accessibility Level
RNOH	Royal National Orthopaedic Hospital
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SIL	Strategic Industrial Land
SoCG	Statement of Common Ground
TfL	Transport for London

Non-Technical Summary

This report concludes that the Harrow Local Plan 2021-2041 provides an appropriate basis for the Planning of the Borough, provided that a number of main modifications [MMs] are made to it. The Council of the London Borough of Harrow has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared a schedule of the proposed modifications and, where necessary, carried out a sustainability appraisal and habitats regulations assessment of them in the form of the Integrated Impact Assessment. The MMs were subject to public consultation over a six-week period. In some cases, I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to the consultation on them.

The Main Modifications can be summarised as follows:

- Modifications to a number of the strategic policies to ensure that they are positively prepared, justified, effective and consistent with national policy;
- Modifications to the strategic objectives of the Plan to ensure that they are effective;
- Modification to policy GB1 to delete the reference to 500 dwellings at the Royal National Orthopaedic Hospital (RNOH) as this is not a justified approach;
- Delete policy GR6 concerning Areas of Special Character as these areas have not been justified by the evidence base;
- Delete policy CE2 as this policy merely repeats London Plan policy and is therefore not justified;
- Modifications to the high quality growth policies contained within Chapter 02 of the Plan to ensure that the policies are positively prepared and effective;
- Modifications to the housing policies contained within Chapter 04 of the Plan as well as the housing trajectory to ensure that the Plan presents the most up to date figures and to ensure that the policies are positively prepared and effective;
- Modifications to policy GI2 concerning Open Space to delete references to areas of deficiency as these have not been justified by the evidence base;
- A number of modifications across the site allocation wording to ensure that the policies are positively prepared, effective, justified, consistent with national policy and in general conformity with the London Plan;
- Modifications to policies LE1, LE2 and the supporting text of LE5 which includes a reference to Appendix 6 which clearly defines the Council's expectations in terms of marketing material to ensure that the policy is effective in this regard;
- Modifications to policy HE1 concerning the historic environment to ensure that the policy wording is consistent with national policy;
- Modifications to policies LE1, LE2 and LE5 concerning retail and town centre matters to ensure that the Plan provides a justified and effective approach to these matters which is consistent with national policy;
- Modifications to policy HO1 increasing the proportion of family homes being sought from 25% to 35% to ensure that the policy is effective;

- Modifications to policy GI3 concerning biodiversity to reduced the requirement for Biodiversity Net Gain (BNG) from 15% to 10% as the evidence does not support a higher target for Harrow;
- Deletion of site allocation O19 which is not justified by the evidence base;
- Modifications to the glossary definitions to ensure that they are consistent with both the Local Plan and the London Plan;
- Modifications to ensure the effective monitoring of the Plan and its policies;
- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Harrow Local Plan 2021 to 2041 (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound.
2. A revised National Planning Policy Framework (NPPF, the Framework) was published and updated in December 2023. The document was subsequently updated in December 2024 (the current published version). However, when taking account of the transitional arrangements in paragraph 230 of the NPPF - December 2024 version, it is the NPPF version published in December 2023 that applies for the purpose of examining the Harrow Local Plan. As a result, the references to the NPPF in this report, are to the version published in December 2023. The NPPF (paragraph 35) makes it clear that in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy.
3. The starting point for the examination is the assumption that the Local Planning Authority has submitted what it considers to be a sound Plan. The Harrow Local Plan, submitted in February 2025 is the basis for my examination. It is the same document as was published for consultation in November 2024.
4. All the references to documents within this report are to documents contained within the examination library which is accessible through the examination website.

Main Modifications

5. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix to this report.
6. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out an updated Integrated Impact Assessment (IIA) (LBH/ED31 and associated appendices). The MM schedule was subject to public consultation for a six week period between 10 November and 23

December 2025. I have taken account of the consultation responses in coming to my conclusions within this report. Where necessary, I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory process and sustainability appraisal/habitats regulations assessment that have been undertaken.

7. In addition to this, a further consultation was undertaken in January 2026 when an addendum to the IIA was published (LBH/ED31aa and appendix B as LBH/ED31ab). This addendum solely addresses superseded references to the amount of housing proposed to be delivered within the Harrow & Wealdstone Opportunity Area and superseded references to the small site windfall allowance. The update concludes that there are no changes to the sustainability performance of the policies when measured against the IIA Framework or the conclusions of the IIA. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory process and sustainability appraisal/habitats regulations assessment that have been undertaken.

Policies Map

8. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development Plan. When submitting a plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted Local Plan. In this case, the submission policies map comprises document CSD02b along with the Atlas of Change document CSD02a.
9. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
10. These further changes to the policies map were published for consultation alongside the MMs (document LBH/ED33 and Atlas of Change (LBH/ED34). When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in these documents and the further changes published alongside the MMs.

Context of the Plan

11. Harrow is an outer London Borough located in the north west of London. It borders four other London Boroughs – Barnet, Brent, Ealing and Hillingdon. It incorporates Harrow which is a metropolitan centre as well as a number of other district and local centres. The Plan proposes the replacement of the following documents in full: Harrow Core Strategy (February 2012), Harrow

Development Management Policies (July 2013), Harrow Site Allocations (July 2013) as well as the Harrow & Wealdstone Area Action Plan (July 2013).

12. Once adopted, the Plan will form the development Plan for the Borough, along with the West London Waste Plan (2015) as well as the Mayor's London Plan (2021).

Public Sector Equality Duty

13. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This, amongst other matters, sets out the need to advance equality of opportunity and foster good relations between people who share a protected characteristics and people who do not share it.
14. This has included my consideration of several matters during the examination including the provision of accessible and adaptable housing, inclusive design as well as the provision of accommodation for those with protected characteristics, which includes but is not limited to Travellers as well as specialist and sheltered accommodation for vulnerable disadvantaged individuals and groups. Furthermore, the Plan seeks to locate proposed development such as housing, employment growth and infrastructure provision to the most sustainable locations, which in turn would assist in reducing the reliance on the private car and assist in advancing equality of opportunity as a result.
15. I have also had regard to the findings of the Equalities Impact Assessment submitted in support of the Plan (CSD10). Based on this evidence, and from my assessment, I conclude that the Plan overall would not result in any significant negative effects on people with protected characteristics.

Assessment of Duty to Co-operate

16. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation, including the Duty to Cooperate (DtC). Nevertheless, the government has introduced legislation that will remove the DtC as a legislative requirement for plans prepared and examined in the existing system although this is yet to come into effect at the time of writing. This is confirmed in the 'Reforming plan-making' Written Ministerial Statement of 27 November 2025 and in a Ministerial Letter to the Planning Inspectorate of the same date as well Regulation 90(2) of the Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026. Whether effective cooperation is maintained will, however, continue to be a soundness consideration in terms of compliance with the Frameworks' expectations on this matter. In these terms, the Framework is clear that "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy". Accordingly, my findings on this matter relate to both the legislative and soundness aspects of cooperation.
17. The DtC Statement (CSD04) as well as the evidence contained within the hearing statements and additional evidence (LBH/ED17) requested following the hearing sessions sets out the Council's approach to this matter. In particular, these documents outline the cooperation which has been

undertaken with Duty to Cooperate partners including neighbouring Boroughs and authorities, prescribed bodies as well as the Greater London Authority (GLA) as the Strategic Planning Authority. A Statement of Common Ground (SoCG) with the GLA confirms that the Mayor of London considers the emerging Local Plan is in general conformity with the London Plan, in accordance with section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.

18. In addition to the above, a number of SoCG with key stakeholders have been produced. These include statements with neighbouring Boroughs (Hillingdon, Ealing, Brent and Barnet, SCG04). The statement covers the engagement which has taken place on a number of identified strategic matters including housing need and supply (including Gypsies, Travellers and Travelling Showpeople provision), the supply of retail and employment land as well as the provision of infrastructure including health, education, utilities and flood risk. In addition to this, SoCG have been signed with statutory agencies such as Historic England (LBH/ED12), Transport for London (LBH/ED14), the Environment Agency (LBH/ED11) where strategic matters such as the management of flood risk and groundwater is addressed as well as the GLA (LBH/ED13).
19. The evidence in CSD04 and LBH/ED17 explains how the Council has worked with these bodies on a number of strategic and cross boundary matters identified including housing need, affordable housing and small sites, Gypsies, Travellers and Travelling Showpeople accommodation provision, employment land provision, strategic green infrastructure, strategic infrastructure including waste provision, tall buildings, burial space, Green Belt and metropolitan open land (MoL) and flood risk. This has been achieved through regular meetings, the production of joint evidence produced at a sub-regional level including for example the West London Alliance (Employment Land Review) and Level 1 SFRA as well as sharing the findings from relevant partners' emerging evidence base. As a result, I am satisfied that this demonstrates the Council's effective and on-going joint working and engagement when addressing strategic and cross boundary matters during the preparation of the Plan.
20. In terms of the issue of burial space, the Council has been working with neighbouring Boroughs on this issue. A separate SoCG covering the matter of burial space provision has been prepared and agreed with the London Boroughs of Ealing and Brent (SCG02). This document reflects the ongoing joint working between the Boroughs on this issue which is being led by the London Borough of Ealing and covers matters such as site search work undertaken and an overview of existing provision. It will feed into the forthcoming London wide audit of London Burial Space provision which is to be undertaken by the GLA. I am also aware that the Plan sets out that the Council are continuing to seek to identify and understand community need relating to burial space. I also acknowledge that policy S7 of the London Plan advises that development plans should ensure that provision is made for the different burial requirements of London Communities, and that a needs assessment including an audit of existing provision should inform the level of need required within the Plan. Whilst there would appear to be an element of tension between the SDS and the Plan on this issue, I am satisfied that this is clearly a cross boundary issue and Harrow have been clear about the extent

of discussions and joint working to date and that work is still on going on this cross boundary issue. This is a pragmatic approach to avoid any potentially significant delay to the adoption of this Plan which importantly addresses other housing and development priorities within the Borough. The absence of such needs being met are not as a result of any shortcomings in terms of DtC.

21. I am satisfied that on the basis of the above, the Council has engaged with all relevant prescribed bodies and relevant organisations constructively, actively and on an on-going basis in the preparation of the Plan and that the DtC has therefore been met. The above considerations also lead me to the conclusion on this matter that the Council has maintained effective cooperation through on-going joint working in a way that accords with the expectations of the Framework .

Assessment of Other Aspects of Legal Compliance

22. My assessment of the legal compliance of the Plan is summarised below:
23. Once adopted, the Plan will replace the following documents: Harrow Core Strategy (February 2012), Harrow Development Management Policies (July 2013), Harrow Site Allocations (July 2013) as well as the Harrow & Wealdstone Area Action Plan (July 2013). It will form part of the Development Plan for Harrow. The development plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land within the local planning authority area.
24. The Plan has been prepared in accordance with the Council's Local Development Scheme (CSD09) which identifies the scope of the Plan and a timeline for its adoption. Whilst I acknowledge there has been a minor delay to the examination of the Plan from that identified within the LDS, this did anticipate the submission of the Plan for examination and the receipt of the examination report to occur within an optimistic 11-month time period. As the Plan is likely to be adopted this year, its strategic policies will look ahead 15 years from adoption as expected by national policy.
25. The Council's Statement of Community Involvement (SCI) (ODS02) sets out how the consultation has been carried out during the preparation of the Plan. It identifies a number of means of consultation to be used for the Regulation 19 consultation process. I have considered the written representations made at the Regulation 19 consultation stage and these have to a large extent informed the matters, issues and questions I raised prior to the hearing sessions and the associated discussions held during the hearing sessions themselves. In addition, I have also taken into account those representations raised during the hearing sessions themselves, as well as the additional consultation responses received during the consultation on the main modifications. The Plan must, by law, be in general conformity with the London Plan.
26. Whilst I note that a number of representors have expressed concerns regarding the accessibility of the consultation form and the time allocated for responses, I am satisfied that the evidence before me illustrates that there was sufficient time allocated to respond to the consultation and the

availability of the response forms to complete was appropriate. In addition, there were both direct email and postal options available and a number of face-to-face consultation events run such as pop up cafés and public consultation exhibitions to assist those with the local plan consultation process. Accordingly, it is my view that based on the evidence before me, there has been clear engagement with the local communities during the Regulation 19 consultation which reflects the principles identified within the SCI. As a result, I therefore conclude that the requirements contained within the Town and Country Planning (Local Planning) (England) Regulations 2012 relating to consultation have been met, and that the SCI was adhered to.

27. The Council carried out a Sustainability Appraisal (SA) of the Plan and this document forms part of the Integrated Impact Assessment (IIA). They also prepared a report of the findings of the appraisal (CSD03a,ab and aa) and published the report along with the Plan and other submission documents under Regulation 19. The appraisal was updated to correct incomplete references within the reports (CSD03 (ac,bb,ee,gg,ii)) and an update note setting out the amendments made has also been included (LBH/ED15). The document was subsequently updated to assess the main modifications, and a further addendum to the IIA was published in January 2026 (LBH/ED31aa and appendix B as LBH/ED31ab). The SA commenced early in the Plan making process and has used a framework to appraise the policies contained within the Plan against a set of defined objectives which have been adequately justified. It has also suitably addressed 3 reasonable alternatives¹, explaining clearly an assessment of the reasonable alternatives considered against the IIA Framework at each stage of the plan making process. These findings were then used by the Council to assess the overall performance of the spatial strategy, policies and sites as well as reasonable alternatives to inform the most appropriate policies to take forward to the Regulation 19 version of the Plan.
28. To summarise, the assessment has found that there would be no significant negative sustainability impacts arising from the Plan and concludes that the Plan represents the most sustainable approach possible within the scope of spatial planning and the constraints faced within the Borough. Overall, the approach to the SA is a robust one and the necessary procedural and legal requirements have been met.
29. The Habitats Regulations Assessment (HRA) February 2025 (CSD03H) was subsequently updated in June 2025 (LBHED15E and CSD03ii) and sets out that a full appropriate assessment has been undertaken. This assessment has considered potential effects in relation to recreation, air quality, water quality and water resource. No adverse effects on the integrity of habitats sites in relation to recreation, air quality, and water resource have been identified. In relation to water quality, mitigation measures have been put forward in relation to Strategic Policy 08 to address this point as well as through a modification to policy CN4. As a result, I am satisfied that the Plan complies with the Habitats Regulations in this regard.

¹ See page 58 of CSD03 (aa)

30. The development plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. These are primarily set out within Chapter 8 of the Plan: Responding to the Climate and Nature Emergency. Strategic Policy 08 provides the overall strategic policy in relation to this matter. In addition, further policies include those policies relating to the overall spatial strategy and the allocation of land for development, sustainable design; clean energy efficiency; waste free economy; enhancing the natural environment; avoiding and minimising flood risk; promoting sustainable forms of travel as well as green infrastructure and biodiversity. I therefore conclude that the development plan which includes the Plan, which is the subject of this examination, achieves the statutory objective in relation to climate change.

Conclusion

31. The development plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area. The Plan seeks to take forward the strategic priorities as reflected in the high-level vision and strategic objectives set out in the Plan and the London Plan. These are addressed through the subsequent policies in the Plan. In those respects, subject to the recommended MMs as set out with reasons elsewhere in this report, the Plan is in general conformity with the spatial development strategy (the London Plan).
32. Subject to the modifications outlined within this report, the Harrow Local Plan complies with all relevant legal requirements and is in general conformity with the spatial development strategy (The London Plan) including the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

33. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified 10 main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or site allocation contained within the Plan.

Issue 1: Whether the Plan's Vision and Strategy are positively prepared, justified, effective and in accordance with national policy and in general conformity with the London Plan?

34. Chapter 1 of the Plan identifies the Borough's profile, spatial vision and strategic objectives as well as the spatial strategy. The spatial vision is set out from page 22 of the Plan onwards. This sets out the intended character of Harrow by 2041. In essence, the text outlines how Harrow will continue to be a thriving outer London Borough. There will be a resounding sense of pride in Harrow, as a place that people want to live, work and visit. Furthermore, the

vision goes onto to identify that the Borough's housing and economic needs will be met, and development will respect the character of the Borough and its capacity to evolve over time. The vision also refers to the importance of creating sustainable neighbourhoods, revisiting town centres and supporting sustainable and cohesive communities. Overall, I am satisfied that the vision as presented presents a positive statement for the Borough, from which the strategic objectives, spatial strategy and the remainder of the policies contained within the Plan can flow.

35. The spatial strategy relates to the spatial vision and associated strategic objectives set out in the Plan. Whilst the overall content of this part of the Plan reflects the Council's Corporate Plan and other relevant strategies, as drafted it is relatively imprecise, includes a lot of repetition and is ineffective. There is also extensive duplication between the spatial strategy and the strategic objectives of the Plan which are identified at pages 23-25. These strategic objectives cover 14 key areas consisting of local identity, infrastructure, transport, air quality, open space, biodiversity, climate emergency, waste and recycling, housing, affordable housing, mixed and inclusive communities, housing types, local economy and town centres. As drafted, this makes the spatial strategy difficult to understand and ineffective as a result. **MM2** and **MM4** address this point by reworking the spatial strategy and spatial objectives into one comprehensive text. The same text has been used from the Regulation 19 version of the Plan to do this, however where necessary, I have amended the wording of the spatial objectives to ensure they are effective. I have also amended the MM as consulted upon to ensure the text is presented as the spatial vision and I am satisfied that no party would be prejudiced as a result of this change. This modification is necessary to ensure the Plan is effective.
36. The key diagram is set out at page 28 of the Plan. However, in the submission version of the Plan, it is called the spatial strategy map. It is necessary for effectiveness and consistency with national policy to ensure that its role, purpose and status as a key diagram is made clear in the Plan. **MM3** amends the supporting text and heading to refer to this as the key diagram which is necessary for effectiveness. This key diagram is consistent with paragraph 23 of the Framework, identifying the key areas of change, in particular the opportunity area, and focus for development within Harrow over the Plan period.
37. The structure of the Local Plan is identified at paragraph 0.0.30. As drafted, it is not clear which are the strategic and non strategic policies contained within the Plan. The Framework is clear at paragraph 21 that local planning authorities should make explicit which policies are strategic policies within a Local Plan. **MM1** addresses this by including a table as an addition to part (d) of paragraph 0.0.30 of the Plan. This modification is necessary to ensure the Plan is effective and consistent with national policy. Furthermore, **MM110** amends the references contained within appendix 5 which identifies the deletion of the text which states that designations continue as shown on the policies map, the modification is necessary for the effectiveness of the Plan.
38. A number of the policies are extensive in length and have elements of repetition between them. This is inconsistent with the Framework at paragraphs 15 and 16 insofar as it expects plans to be succinct, and for

unnecessary duplication to be avoided. In instances where this has led me to believe that there are soundness concerns, I have suggested modifications accordingly to avoid this duplication between the policies. I address individual policies under the issue headings below to deal with this matter.

39. Whilst the Plan contains a glossary at appendix 1, a number of the definitions are inconsistent with either the London Plan, National Policy or both. **MM102, MM103, MM104, MM105, MM106, MM107** rectifies these inconsistencies which are necessary for the policies to be effective, consistent with national policy and in general conformity with the London Plan.

Conclusion

40. For the reasons I have outlined above, and subject to the MMs identified above, I conclude that the Plan's vision and strategy are positively prepared, justified, effective and in accordance with national policy and the London Plan.

Issue 2: Whether the Plan's approach to identifying the housing requirement is justified and consistent with national policy and in general conformity with the London Plan?

The Housing Requirement

41. The housing requirement for Harrow, and indeed all London Boroughs, is set out in the London Plan which comprises the spatial development strategy which is as defined at paragraph 17 b) of the Framework. The Planning Practice Guidance (PPG) states that where a spatial development strategy has been published, local planning authorities should use the local housing need figure contained within this document and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.
42. The housing requirement figure within the Plan has therefore been derived from the London Plan and policy H1 which sets a housing target for net housing completions for each of the London Boroughs. In the case of Harrow, this is a 10 year delivery target of 8020 homes by 2028/2029. This approach is evidenced within the Local Housing Needs Assessment 2024 (EBH02).
43. In terms of identifying a target beyond this 10 year period, the London Plan identifies that if a target is needed beyond the 10 year period, boroughs should draw upon the 2017 SHLAA findings and any local evidence of identified capacity. Based on the London 2017 SHLAA, the Local Plan housing target would be between 12,829 and 13,954 (depending upon the small sites target being applied to a 10 year or 13 year period). The local evidence in the form of the site selection paper and subsequent IIA testing in terms of the housing requirement demonstrates that a housing need figure of 16,040 homes is achievable. The GLA have confirmed that the approach adopted to the housing requirement is in general conformity with the London Plan. Overall, I am also satisfied that this approach is in line with the London Plan and paragraph 4.1.11.
44. Whilst I am aware that the overall London housing target is likely to increase in the coming years, it will be for the London Plan to identify what this target

is and set out appropriate figures for the individual Boroughs accordingly. Contrary to the views expressed by representors, this process has not been completed as yet, nor is it at such a stage that any weight could be apportioned to any revised approach which may or may not come forward. I am therefore satisfied that the approach set out within the Plan to identifying the housing requirement presents a sound approach that is in general conformity with the London Plan. Strategic Policy 03 sets out how the Plan will address Meeting Harrow's Housing Needs and the detail of this policy is outlined below.

Conclusion

45. I therefore conclude that the Plan's approach to identifying the housing requirement is based on robust evidence and is therefore positively, prepared, justified and effective and consistent with the Framework. It is also in general conformity with the London Plan.

Issue 3: Whether the Plan's approach to the housing strategy and the spatial distribution of housing and the delivery of housing is justified, consistent with national policy and in general conformity with the London Plan?

Housing strategy

46. The Council's approach to the delivery of housing is set out within Strategic Policy 03. This is a lengthy policy and covers an extensive number of housing related topics. The policy covers housing delivery overall, as well as identifying the locations within the Borough where housing delivery is to be focused and identifies minimum housing delivery figures for these individual areas. Furthermore, the policy then identifies the strategic approach to housing choice, affordable housing, the mix of housing, specialist older persons housing, supporting specialist accommodation, non self-contained accommodation, self-build and custom build housing, build to rent, Gypsy and Traveller accommodation and estate regeneration. Finally, the policy sets a criteria based approach for assessing the safeguarding of existing housing stock, and includes text regarding the implementation of the policy.
47. The policy states that the Council will support the delivery of new housing on a range of suitably sized sites, prioritising previously developed land with the primary focus being on the Harrow & Wealdstone Opportunity Area (HWOA). The HWOA is identified in Strategic Policy 01 as a suitable location to accommodate growth and higher density development due to its existing character. It is also the focus for tall buildings within the Borough and the policy framework for assessing these is set out at policy GR4. The Opportunity Area is allocated through policy SD1 of the London Plan and the associated table 2.1, which identifies that development plans should clearly set out how they will encourage and deliver the growth potential of the Opportunity Area. Beyond this, Strategic Policy 03 seeks to focus development on allocated sites within the Borough, small sites with good public transport accessibility and then windfall sites.

48. Part 1 of Strategic Policy 03 policy states that the Council will optimise opportunities to deliver a minimum of 16,040 (net) homes during the Plan period (2021/22-2040/41) of which at least 8020 (net) new homes will be delivered between 2019–2029. Part 2 of the policy reiterates the London Plan target for the delivery of a minimum of 3750 net new homes on small sites across the same time period, which is a component of the overall housing requirement. Part 3 of the policy deals with housing figures for the HWOA, the rest of the Borough and then small sites.
49. As currently drafted, the policy does not present the most up to date housing figures in part 3 of the policy². The Council's ongoing work through the examination process has refined these figures and I consider this work to present a robust position. **MM19** addresses this which is necessary for effectiveness. The modification also addresses a number of other changes within the policy wording and supporting text which are necessary for effectiveness, including amending the minimum percentage delivery of three bed (or more) family sized dwellings as addressed under issue 4 below. In part 5 C and D of the policy, the policy wording is ineffective as it refers specifically to specialist older person housing rather than accommodation for older people, with additional text necessary to refer to the fact that any specialist older person accommodation and care home needs beyond 2032 will be based on the benchmark/need figure included within the future London Plan, unless an updated Local Needs Assessment is undertaken. This text ensures the policy wording is both positively prepared and effective. Part 5 H of the policy which addresses Gypsy and Traveller accommodation needs is amended through the modification in order to ensure the strategic approach is consistent with that reflected in policy HO12. Part 7 of the policy concerning a specific estate regeneration scheme at Grange Farm Estate is deleted as this wording merely repeats part of policy HO5 as well as the associated site allocation and this is not effective. For the same reasons, part 9 of the policy concerning implementation is also deleted as this text presents a statement of intent so would be ineffective in its application as a result. The modification also moves the supporting text from policy HO6 to this policy which will ensure the effective application of part 5 C of the policy.
50. Subject to the modification I have outlined, and taking into account the summary of the housing strategy outlined above, as well as the approach outlined by Strategic Policy 03, I am satisfied that the Council's approach is an appropriate one. The evidence base has demonstrated how reasonable alternatives to the Council's preferred housing strategy have been assessed and rejected. Taking into account the development constraints which have been outlined, I find the housing strategy to be appropriate, justified and effective.

Housing Supply

51. During the course of the examination, the evidence which underpins the housing trajectory has been updated from what was provided at paragraph 11.22 of the submitted Plan. Table H1, which identifies the indicative

² See also Issue 8 of this report

Borough housing supply relative to requirement along with the associated supporting text is therefore deleted through **MM19**. This is in order to ensure that development proposals are assessed relative to the most up to date housing supply evidence rather than table H1 which represented the position at the time of the Regulation 19 consultation. This is necessary to ensure the Plan is justified and effective. The modification includes the latest information which has informed the delivery timescales identified in terms of both committed sources of housing supply (those sites which have planning permission, where development has already commenced and windfall supply) and site allocations contained within the submitted Plan.

52. Completions are also indicated between 2021-2024 and amount to some 1929 dwellings. In some instances, this updated information has resulted in the timescales for delivery moving to latter parts of the Plan period as phasing information for some of the larger schemes has been updated. For example, in relation to both sites OA9 (Poets Corner) and OA16 (Kodak) where these sites alone amount to a minimum delivery of some 3439 dwellings.
53. The information provided by the Council has been assessed against the relevant tests contained within the Framework in terms of deliverable and developable sites. **MM59** and **MM60** taken together update the trajectory to provide the residential capacity for each of the sites to be expressed as a minimum figure only. This is to ensure consistency with the remainder of the Plan. The modification also provides greater certainty regarding the phasing of individual sites which is important for effectiveness and to ensure the housing trajectory is justified. In addition, the modification updates the housing capacity for the Borough to ensure the information provided is consistent with the remainder of the Plan. This is necessary to ensure the Plan is justified and effective.
54. The updated trajectory introduced through **MM60** confirms that the Plan will provide a sufficient supply of sites to deliver 16,829 new homes across the Plan period as a whole, with 10,679 dwellings being delivered during the first 10 years of the Plan period. The evidence before me provides sufficient justification that the Plan will meet the 10 year housing requirement of 8020 dwellings as identified by the London Plan. Whilst I note that the London Plan 10 year period runs from 2019, there was an over delivery during those first two years and accordingly there is no shortfall to address. A significant proportion of this supply pipeline comes from sites within the HWOA (sites OA1-OA17 inclusive) with other site allocations (O1-019) following as well as an element of windfall allowance.
55. In terms of the latter part of the Plan period (years 11-15 inclusive) the Plan would be reliant upon the delivery of a mixture of sites within and outside of the HWOA as well as windfall sites. I am mindful of the assumptions which have been made which have led to the capacity figures indicated in relation to these sites. In particular, the evidence contained within appendix 1 to the Council's Matter 6 hearing statement which includes the Capacity Study report. Taking into account the Framework, which sets out that housing supply, could include specific developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15, the potential

development capacity identified for these sites in years 11-15 of the Plan period is a reasonable and justified approach.

56. As a result, and subject to the MMs outlined above, I conclude that the information provided concerning housing delivery as contained within the modified housing trajectory presents a sound and justified approach. Furthermore, the approach is consistent with national policy and is in general conformity with the London Plan.

Small sites and Windfall

57. The Plan as submitted states at Strategic Policy 03 Part 3 (c) that 4125 of the total supply of housing will come from small sites windfall. As set out above, the figure is updated to 5250 through **MM19** which is necessary to ensure the policy is effective and reflects the most up-to-date housing figures.
58. Paragraph 72 of the Framework sets out that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Paragraph 4.2.3 of the London Plan advises that the small sites target (outlined below) can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by the Framework.
59. In the case of Harrow, the justification for the windfall allowance is also supported by the evidence contained within the Small Site Capacity Study 2022 (EBH05). The report considers past trends which provides evidence on small site delivery as well as undertaking capacity led design work to assess the potential to accommodate new housing development on small sites across the Borough. This report concludes that the Borough has the potential to accommodate between 381- 478 new homes per year (midpoint 430) on small sites.
60. In addition to the above, the London Plan definition of small sites (those below 0.25 hectares in size) and Policy H2 of the London Plan concerning small sites requires, amongst other things, that Boroughs should pro-actively support well designed new homes on small sites, noting that increasing the rate of housing delivery on small sites is a strategic priority. Table 4.2 of the London Plan publishes a 10 year minimum small site delivery target (2019/2020–2028/2029) of 3750 units (375 units per annum) and the Council have rolled this target forward on an annualised basis.
61. The Council supplemented the evidence contained within document EBH05 through the Annual Monitoring Reports which set out the net unit delivery for small sites windfall for the period 2014/15 to 2023/2024 to be a total of 3138 dwellings, providing a 10 year average of 314 dwellings. This is slightly below the London Plan small sites target of 375 dwellings however it does provide a sound basis that this forms a reliable component of housing supply for the Borough. Furthermore, the small site windfall of 375 is only applied to the period beyond 2027/2028 and a figure of 365 is used prior to this. This is based on Planning permissions and those under construction, whilst applying a 17% lapse rate based on historic trends for non implementation. I consider this to present a cautious but nevertheless realistic approach to small site

delivery and the role it can play in terms of housing delivery across the Plan period.

62. As a result, I am satisfied that the evidence before me demonstrates that the small site windfall rate applied within the Plan is a justified approach. Taking the above into account, I am able to conclude that the Council's approach to small sites and windfall is a sound one.

Five Year Housing Land Supply

63. The Framework requires at paragraph 69 that Councils demonstrate a specific five year supply of deliverable sites for housing upon adoption of the Plan. By my estimations, should the Council be minded to accept the recommendations contained within this report, it is reasonable to assume the Plan could be adopted by Spring 2026. The evidence regarding five year housing land supply has been updated and is contained within document LBH/ED29. In light of the updated trajectory and the changes summarised above, a further hearing session was held on 13 October 2025 which afforded both myself and representors the opportunity to interrogate the figures presented within the updated trajectory and five year supply calculations.
64. I am aware that the supply which the Council are relying upon includes several sites with planning permission, with windfall and site allocations forming the remaining part of the supply position. Issue 8 later in this report considers the site allocations contained within the Plan on an individual basis. In particular, the delivery timeframe outlined within the trajectory has been informed by information from local developers, pre application discussions, and monitoring data. An explanation of the phasing assumptions made and the reasoning for them has also been provided by the Council.
65. The Council has met the latest housing delivery test, as a result, the identified five year supply of 5,013 dwellings would exceed the London Plan housing requirement annualised over five years of 4010 dwellings, with a 5% buffer. This five year supply comprises site allocations totalling 3052 dwellings, 96 dwellings from one large extant unallocated site, 365 dwellings from small sites with extant permission (with a 17% lapse rate applied) and 1500 dwellings from small sites.
66. It is evident that the delivery of homes within Harrow is significantly reliant upon sites within the HWOA and indeed the monitoring data provided by the Council highlights the extent of new homes with planning permission within the HWOA. In addition, past delivery rates demonstrate a track record of delivery on a number of key sites within the HWOA, as well as evidence concerning the existing pipeline of sites coming forward within the HWOA. This evidence indicates the position presented regarding five year supply is both realistic and reasonable. Furthermore, both the glossary of the Framework as well as the PPG provides clear guidance as to what is considered to be a 'deliverable' housing site in the context of Plan making and, based on the evidence presented, the sites identified within the five year supply figures would meet these criteria.
67. In the context of the sites which the Council are reliant upon in terms of five year supply, I am content that the evidence presented on the deliverability of these sites is sufficiently robust to ensure that the Plan is justified and

effective in this regard. As a result, I am able to conclude that a five year supply of deliverable housing land as required by the Framework is available upon adoption of the Plan.

Conclusion

68. Subject to the MMs identified above, the Plan's approach to the spatial distribution of housing and the delivery of housing is based on robust evidence, is justified and effective. It is consistent with national policy and in general conformity with the London Plan.

Issue 4: Whether the Plan contains justified and effective policies to help ensure that the housing needs of different groups in the community can be met throughout the Plan period?

Affordable housing

69. The evidence base concerning affordable housing consists of the Local Housing Needs Assessment (EBH02) 2024. Table 54 within this document indicates an affordable housing requirement of 7870 dwellings over the 20 year period 2021-2041, which is broadly equivalent to just under 50% of the overall housing requirement. The viability work (EBLE02) considers this policy requirement in the context of the 48 different typologies tested and confirms that this target is broadly deliverable and viable. This document was produced in line with the guidance contained within the PPG and is based on robust and up-to-date inputs.
70. In line with this evidence, affordable housing within the borough is addressed by policy H04. The policy seeks to secure the Borough wide target of 50% affordable housing, and a minimum of 35% affordable housing to apply for the fast-track route. This approach is consistent with policy H4 of the London Plan. **MM23** amends the policy wording at part B of the policy to ensure it is positively prepared. In addition, the modification also introduces a new criterion at part C text to cross reference the requirements of policy H01 regarding dwelling size mix which is necessary for the policy to be effective. Part E of the policy which refers to securing grant funding to deliver a level of affordable housing above that identified by the policy is amalgamated with part D of the policy for effectiveness. Part G of the policy as submitted deals with tenure mix. The policy wording is amended by **MM23** for effectiveness as the table merely repeats the policy wording. Further modifications are proposed to part H and the supporting text which does not serve a clear purpose as it merely repeats other policies contained within the Plan and makes the wording concerning consultation with Registered Providers effective. Part N of the policy deals with vacant building credit and this along with corresponding changes to the supporting text are deleted by the modification as these parts of the policy are not positively prepared.
71. Overall, subject to the MM outlined above, I am satisfied that the approach adopted by policy H04 to the delivery of affordable housing within the Borough is a sound one and is consistent with policy H4 of the London Plan.

Gypsy and Traveller Accommodation

72. In terms of Gypsy and Traveller Accommodation needs, background evidence provided by the Council consists of the West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, October 2018 (EBH10). This document considers the needs for Gypsy, Traveller and Travelling Showpeople accommodation across a number of London Boroughs which form part of the West London Alliance (Barnet, Brent, Ealing, Harrow, Hillingdon & Hounslow). However, this document is now some 8 years old and also fails to undertake any surveys of existing Gypsies and Travellers residing in the Borough. It also pre-dates the updated definitions of "Traveller" and "Travelling Showpeople" set out in a more recent version of the Planning Policy for Traveller Sites (PPTS).
73. In terms of an update to this evidence, the GLA has commissioned consultants to assess future Gypsy Traveller and Travelling Showpeople pitch needs for all London Boroughs between 2022- 2032 and Harrow have been working with the GLA in relation to this document. This report, known as the Gypsy and Traveller Accommodation Needs Assessment (GTANA) for Greater London was published in November 2025. This report indicates a need to provide 13 pitches within Harrow between this time period. The report does not identify any needs for Travelling Showpeople over this time period. The Plan does not seek to identify a target beyond this time period as policy H14 of the London Plan advises Boroughs must include a ten-year pitch target within their development plan documents. This document provides the latest up to date evidence for Harrow. Furthermore, **MM19** introduces additional text to part 5 H which advises that any pitch needs beyond 2032 will be based on any need figure included within the London Plan or an updated accommodation needs assessment. In light of the circumstances in relation to this plan and the evidence before me, this presents a sound approach.
74. The Plan includes Policy HO12 which will be used to assess proposals to meet Gypsy and Traveller accommodation needs and the detailed wording of this policy is considered below. However, in terms of the overall approach to providing for this need, the approach adopted by the Council in terms of planning for the indicative level of need (which has been subsequently confirmed through the publication of the GTANA report) is a pragmatic one to avoid any potentially significant delay to the adoption of this Plan and importantly addressing other housing and development priorities within the Borough.
75. Policy H012 sets out how these needs will be met over the Plan period. Part 1 of the policy identifies the existing traveller site at Watling Farm and the policy seeks to ensure the provision of a minimum of 13 new pitches in this location. The Council have provided detailed evidence concerning the capacity at Watling Farm to accommodate these additional pitches and how this has been calculated. I am satisfied that based on the evidence presented on this issue, the identification of the existing traveller site at Watling Farm to accommodate these additional needs is a justified and effective approach. **MM29** amends the wording of part 1 of the policy to ensure it correctly references the nearby heritage asset of Watling Farm which is necessary for effectiveness.
76. For the remaining needs, the policy introduces a positive criteria-based approach through part 3 of the policy which will be used to assess and

support the delivery of pitches to address future accommodation needs going forward. However, the policy as submitted is not positively prepared nor effective and the detailed wording of the individual criteria are not consistent with national policy contained within the PPTS. It is necessary to amend the criteria provided within the policy through **MM29** for effectiveness, and part 3 (g) of the policy has been deleted as it is not justified nor consistent with national policy. **MM29** also identifies a number of corresponding changes to the supporting text which are also necessary for effectiveness.

77. Subject to modifications outlined above, the approach to providing for Gypsy and Traveller needs through policy H012 presents a sound approach and will provide a suitable framework for the consideration of any proposals which may come forward and provides for the needs identified to 2032. Whilst I recognise that the policy wording does not specifically address Travelling Showpeople, I am satisfied that based on the latest evidence before me this presents a sound approach and that any subsequent needs for this group will be assessed as part of the next review of the Plan.

Other housing policies

78. Policy H01 addresses dwelling size mix. The policy seeks to ensure that residential developments provide an appropriate mix of units which address the needs of the Borough. The policy wording recognises that a range of factors should be taken into account in terms of providing a good mix of unit sizes to address the Borough's housing needs. This includes but is not limited to site size and its physical characteristics as well as the location of the site, the surrounding context and character. This part of the policy wording reflects a balanced and proportionate approach within the policy.
79. However, the policy seeks to secure a minimum of 25% of all units within a scheme as family sized dwellings (three bedrooms or more). This approach does not align with the Local Housing Needs Assessment 2024 (EDH02) which points to a much greater need for family dwellings, in the region of 80% of all new housing over the Plan Period. The Borough profile set out within chapter 1 of the Plan also identifies that Harrow has significantly larger households than the London average, with 32.5% of households having 4 or more people compared to the London average of 24.1%. Harrow also has a significantly lower proportion of lone person households (12.1%) than the London average (20.1%). Based on the evidence before me, this minimum 25% figure is not justified and policy H01 is not sound as a result.
80. Following discussions at the hearing sessions, and additional evidence provided by the Council in terms of what level of affordable housing could be viably supported (EBH/ED26), as well as a consideration of the design led capacity work completed, I recommend **MM20** which increases the percentage of family homes to require a minimum of 35% family home provision in housing developments. The modification to the policy wording and supporting text also amends elements of the policy wording within part A1, B4, C5 and sub clause d along with associated changes to the supporting text at 4.1.10 and 4.1.12 as these parts of the text are not justified, as well as to ensure it is evident how a decision maker should react. The modification also removes part A3 which is not positively prepared, as well as deleting part D of the policy concerning monitoring as this text merely

repeats how monitoring of the policy will be undertaken, referencing the fact that the Annual Monitoring Report will set out progress on delivering these priorities which is comprehensively covered in appendix 2 of the Plan. **MM19** also addresses a corresponding change required to Strategic Policy 03 as a result of this change which is necessary for soundness.

81. In suggesting the previous modification, I am satisfied that the higher target would be in general conformity with policy H10 of the London Plan in terms of housing size mix. This policy requires development schemes to generally consist of a range of unit sizes, having regard to a number of factors identified within the policy, including but not limited to robust local evidence and the mix of uses within a scheme. Increasing the family home requirement from 25% to 35% would still be in accordance with this London Plan policy and aligns more closely with the proportions of larger households in Harrow previously mentioned. In reaching this view I have taken into account that the Local Housing Needs Assessment identifies the potential for setting a target for family homes as high as 80%. However, based on the totality of evidence before me this would not be a deliverable or viable proposition. On balance, and subject to the modification outlined, I am satisfied that increasing the proportion of family homes sought by policy H01 would present a justified and effective approach and the policy would be sound.
82. Policy H02 deals with the conversion and redevelopment of dwellings. The policy defines criteria which will be applicable to proposals coming forward, by identifying a number of criteria which proposals will need to comply with, as well as identifying minimum internal floor areas. The objective of the policy is to effectively manage housing growth and ensure residential conversions into multiple homes does not have a detrimental impact on the character, stock of family sized housing or the amenity of the local area. **MM21** amends criteria 2i of the policy to ensure it is in general conformity with the London Plan. Subject to this modification, the policy presents a sound approach and will be effective as a result.
83. Optimising the use of small housing sites is addressed by policy H03. This policy has been drafted with reference to London Plan Policy H2 concerning Small Sites which sets a strategic priority to increase the rate of housing delivery from small sites. Whilst the policy wording itself does not include a target for small site delivery (as this is covered by Strategic Policy 03) the policy provides a clear framework for the assessment of proposals on small sites and outlines the relevant criteria which will be taken into account as part of this assessment.
84. Notwithstanding the above, a number of the individual criteria are either not sufficiently clear so it is evident how a decision maker should react to development proposals or are not justified as they unnecessarily duplicate national policy. **MM22** amends criteria 1 of the policy to cross reference policy H2 of the London Plan instead of repeating the criteria of this policy. The modification also deletes text from this criteria and criteria 2 and 3 which duplicate existing parts of the policy wording as this text is no longer effective wording given the change outlined above. The modification also deletes part 3 e) and amends the remainder of the policy wording for effectiveness and removes part 5 which states the monitoring of the policy

will be addressed through the Annual Monitoring Report. This wording is not necessary for the policy to be effective as monitoring of all policies contained within the Plan is identified within Appendix 2 of the Plan. Subject to this modification, the policy presents a sound and effective approach to optimising the use of small housing sites.

85. Housing estate renewal and regeneration is addressed by policy H05. It provides a criteria based policy for any proposals which may come forward for estate renewal. Given that Harrow has a clear history of comprehensive estate renewal schemes this is a justified and effective approach. **MM24** modifies the policy wording for effectiveness, as well as updating the cross policy references within the policy wording for effectiveness and consistency with the London Plan. Corresponding amendments are made to the supporting text regarding the historical justification for the policy which is not necessary for soundness. Subject to modifications outlined above, the policy presents a sound approach.
86. Policy H06 deals with accommodation for older people. This is a key policy area for the Borough, given that Harrow is expected to experience an aging population with a significant growth in the older population during the Plan period. **MM25** brings about a number of changes to the policy wording which are necessary for the effectiveness of the policy and to ensure it is positively prepared. In the first instance, the name of the policy is amended to refer to meeting the housing needs of older people as this is a more accurate reflection of the policy itself. The policy wording at parts 1, A, 2 B3 and 4 are all amended for effectiveness, to reduce repetition between the criteria of the policy which is not a justified approach and to ensure the policy is positively prepared. New sub headings have also been added to the policy to ensure effectiveness. Corresponding changes to the supporting text are made in light of these policy changes. Subject to this modification, the policy presents a sound approach to the provision of older persons accommodation over the Plan period.
87. Policy H07 which deals with supported and sheltered accommodation is also modified through **MM26**. The policy name is changed to refer to supported and specialist housing as this presents a more accurate reflection of what the policy covers. The modification also covers a number of policy wording changes in relation to the criteria under parts 1 and 2, which are all amended for effectiveness, to reduce repetition between the criteria of the policy which is not a justified approach and to ensure the policy is positively prepared. The modification also includes subsequent modifications to the supporting text to ensure this is consistent with the policy wording and reflective of the evidence base. Subject to this modification, the policy presents a sound approach.
88. Policy H09 addresses proposals for large scale purpose built and conversions for shared living (LSPBSL). This sector of accommodation does not fall within Class C3 residential use as it comprises purpose built managed rental development with non self contained units comprising of functional living areas with extensive communal spaces and facilities with the entire facility under a single professional management. As the housing needs assessment did not identify any requirements to provide LSPBSL, the policy wording reflects this by requiring proposals to demonstrate how they are meeting an

identified local housing need. In light of this, the Council are also not proposing that any of the site allocations contained within the Plan are allocated specifically for this use. I agree this is a justified approach.

89. The policy also requires proposals to accord with London Plan policy H16 which addresses large scale purpose built shared living. Whilst the Council recognise the role that LSPBSL have in terms of potentially 'freeing up' other forms of accommodation, the policy is necessary to ensure that any proposals which come forward provide an appropriate standard of accommodation and are within an appropriate location within the Borough.
90. As a result, the policy presents a criteria based approach, which cross references to London Plan policy H16. I have considered the criteria provided within the policy, in particular the requirement of Part A (d) which states that there must not be two LSPBSL schemes within a 250m walking distance of each other to avoid an over concentration of similar uses, unless robust evidence demonstrates the site will not be suitable or viable for appropriate alternative uses. The justification provided by the Council on this matter was that the London Plan indicates that LSPBSL provide housing for single person households. Research cited within the Councils hearing statement indicates the average age of a LSPBSL resident is 28, with 72% of residents aged between 26-40. In contrast, the Local Housing Needs Assessment does not indicate that this is a sector of the population which is projected to increase over the Plan period. As I have established above, the clear overriding need within the Borough is for the delivery of family sized units. Given the priority within the Framework to ensure that sufficient land comes forward for future housing needs and in light of this context within the Borough, I agree the approach to over concentration is pragmatic and justified.
91. I recognise parties have objected to the requirement set out at part A (c) of the policy that proposals should be located within the boundary of the Harrow & Wealdstone Opportunity Area. However, as identified within the supporting text, a significant part of the HWOA has high transport accessibility, along with a number of rail and tube stations and town centres. This is to my mind an appropriate definition to adapt in light of the London Plan policy on this matter.
92. Despite the general thrust of the policy presenting a justified approach, **MM27** is necessary to amend the policy wording to include sites with permission. This is necessary for soundness and to ensure the policy provides an effective approach in this regard.
93. **MM27** is also recommended to ensure the requirements of the policy are clear and it is evident how a decision maker should react to development proposals. The modification also removes parts A e, f and g of the policy which are duplicated elsewhere within the Plan. It also moves text which was contained within the supporting text and also at part A regarding a requirement for applicants to submit a satisfactory Management Plan as this wording is more than a locational and site-specific consideration which part A of the policy deals with. These changes are necessary for the policy to be effective. Subject to this modification, the policy presents a sound approach.

94. Policy H10 addresses Housing with shared facilities (Houses in multiple occupation, HMO). The second part of the policy sets out an approach to the assessment of large purpose built HMO development. The Local Housing Needs Assessment recognises the important role that HMOs play in addressing the needs of the younger population. As a result of this, the Plan acknowledges that HMO facilities can provide a valuable source of affordable housing stock accommodation. The first part of the policy identifies a criteria based approach to the assessment of these facilities. **MM28** is necessary to delete criteria 11 as this duplicates other policies contained within the Plan which is not a justified approach. The modification also renumbers the remaining part of the policy and corrects cross referencing within the policy which is necessary for effectiveness. Subject to this modification, the policy presents a sound approach.
95. Whilst not strictly a housing policy, policy GR10 addresses infill and backland sites, back gardens and amenity areas. The policy aims to provide a framework for assessing development opportunities which may arise in relation to this type of site, which are commonplace in outer London Boroughs such as Harrow and can provide opportunities for small site housing delivery. The policy provides general criteria against which proposals should be assessed, and then provides specific criteria regarding infill sites, backland development, non designated open space, garden land and garage sites. However, as drafted the wording of the policy includes a significant amount of repetition between these criteria and confusingly applies specific criteria to certain types of site and not others, with no logical reasoning for this approach. Furthermore, the policy also repeats parts of the High-Quality Growth policies such as policy GR1 contained within chapter 2 of the Plan. **MM15** addresses this by amending the policy title as well as the criteria, deleting duplication within the policy wording so that they can be applied consistently which is necessary for consistency with national policy as well as the effectiveness of the policy. Subject to this modification, the policy presents a sound approach.

Conclusion

96. Subject to the MMs identified above, the Plan's approach to housing policies and other housing needs of different groups in the community is based on robust evidence, is positively prepared, justified and effective and consistent with national policy and in general conformity with the London Plan.

Issue 5: Whether the Plan presents a positively prepared, justified and effective approach towards the Opportunity Area, economic growth, town centres and retail needs and is the approach consistent with national policy and in general conformity with the London Plan?

Economic Growth

97. The Plan's approach to the local economy is set out at Chapter 5. It seeks to deliver sufficient employment floorspace to enable a strong and flexible economy over the Plan period. In terms of the evidence base, the following documents are of relevance. Firstly, The West London Employment Land Review 2022 (EBLE03) provides an overview of the industrial property

market for both Ealing and Harrow. This document notes that there is a need for 6000sqm of industrial floorspace over the Plan period, and the Plan approach to the delivery of this is through the intensification of existing industrial sites. This is an approach identified within policy E7 of the London Plan. In relation to office market trends, the Harrow Economic Needs Study Town Centres and Office Update, 2024 (EBLE01) reviews this in the context of both the London office market, national and regional trends, and the local context. It notes that based on past trends, there is likely to be a surplus of office employment land to the period to 2036. I am satisfied that the principle of the approach's outlined above is a sound one which accords with both national policy as well as the London Plan.

98. In terms of the policies themselves, Strategic Policy 04 Local Economy sets out a framework for a number of matters including town centre, offices and retail floorspace, industrial land and premises, as well as local employment and business opportunities. As currently drafted, the policy is lacking in a number of ways. It fails to define the town centres within the Borough which make up the town centre hierarchy and the network of town centres as defined on the policies map. This makes the policy ineffective in this regard and fails to take account of policy SD7 of the London Plan concerning town centres, development principles and development plan documents. **MM30** addresses this by rewording parts A and B of the policy to clearly define the town centres within the Borough and then identifies the relevant policies which will be applicable to these defined centres. It also cross references the Neighbourhood Parades which are detailed in appendix 4 of the Plan which is necessary for the representation of these parades on the policies map to be effective. The policy also fails to define what the retail and leisure needs are over the Plan period as informed by the most up to date evidence. **MM30** addresses this and this modification will ensure the policy wording is effective in this regard.
99. In terms of part C of the policy which deals with industrial land and premises, the modification also amends this part of the policy by clearly defining what the industrial floorspace needs over the Plan period are as informed by the most up to date evidence. The modification also amends the policy wording in terms of the references to the various land uses covered by the policy which provides certainty to decision makers and is necessary for soundness to ensure the Plan is effective in this regard.
100. The overall policy approach towards both Strategic Industrial Locations (SIL) as well as Locally Significant Industrial Sites (LSIS) is set out within policy LE3, whilst also dealing with non-designated industrial land and non-industrial uses. In terms of the approach to SIL (as defined at table 6.2 of the London Plan) and LSIS, proposals which seek to intensify, increase or modernise floorspace and premises within these areas will be supported. This approach is both consistent with the approach advocated by the London Plan, as well as the evidence base and I am satisfied that the boundaries reflect their intended function and land use and are sound. **MM34** amends the policy references through the policy to remove references to individual use classes which is necessary to ensure the policy is effective in its application. I have also added a cross reference to defining these areas on the policies map since the MM consultation to give effect to this policy designation. Subject to this modification, the approach to industrial land within the Borough is sound.

101. The Council are bringing about a change from a SIL designation to LSIS on the policies map in relation to the Former Kodak Administration site. This change is identified as LE10 within document LBH/ED34. Three further changes from business use to LSIS are identified as LE01, LE04 and LE08. Furthermore, the document also identifies a number of sites where Business Use area designation is being removed as there is no such policy applicable to this designation within this Plan. These changes are identified as LE02, LE03, LE05, LE06, LE07, LE09. As I do not have the ability to recommend changes to the policies map, it will be for the Council to make these necessary changes.

The Harrow & Wealdstone Opportunity Area (HWOA)

102. As I have identified under issue 3 above, the primary focus for growth over the Plan period is the HWOA and the strategic policy for this is Strategic Policy 05. This policy identifies that the opportunity area comprises three distinct areas – Harrow Metropolitan Town Centre and the surrounding area, Station Road and Wealdstone District Town Centre and surrounding area. The Council will need to update the policies map as shown within document LBH/ED34 to bring effect to these allocations and illustrate the extent of the HWOA, as well as the three sub areas within it – namely the Harrow Metropolitan Town Centre, Wealdstone District Town Centre and the Station Road sub area. Part A of the policy sets out a variety of land uses which will be supported within the HWOA, and highlights that the Council will direct and support development in this area where it assists with the growth and regeneration of the area. In the case of housing and jobs, parts a and b of the policy identify quantum's in this regard.

103. I am aware that concerns have been expressed concerning the inclusion of the Station Road area in particular within this policy. These concerns have focused in part on the character of this sub area relative to the remainder of the HWOA. The policy wording itself refers to the surrounding suburban character of the area which is much lower in density. In addition, the supporting text at paragraph 5.0.40 also acknowledges the strong suburban character of the area, and notes that all new development will have to demonstrate how the site interfaces between the more densely developed location and strong suburban character of lower height and density. However, based on the evidence before me and my own observations, the area clearly plays an important role providing a linkage between Harrow and Wealdstone town centres. As such, I consider the inclusion of the Station Road corridor to be a sound approach in principle to optimise development, subject to appropriate policy wording in Strategic Policy 05 which recognises and ensures development proposals safeguard its distinctiveness.

104. The policy notes that each of these areas has a distinct character and serves different functions, and the policy identifies a range of factors that will be taken into account in terms of assessing development proposals within these areas. These criteria are set out at parts D, G and H of the policy.

105. As drafted, the policy is not sound as the reference to 'surrounding areas' around the Harrow Metropolitan District Town Centre and Wealdstone District Town Centres is neither defined within the Plan or on the policies map. This makes the policy ineffective. **MM31** deletes this text from the policy and

adds additional text to clearly note that the sub areas are as shown on the policies map which is necessary for the policy to be effective. The modification also amends the quantum of homes for the HWOA to align with the latest housing trajectory. In addition to this, the modification also deletes the reference to supporting the delivery of 1000 jobs³ within the HWOA and replaces this text with wording to recognise the role that non residential town centre floorspace can play. This is necessary as the minimum 1000 jobs is taken from the indicative jobs target identified within the London Plan, and this wording is not effective within this strategic policy as the Councils evidence base considers employment needs in floorspace terms.

106. Parts B, E and F of the policy are deleted through the modification as they are ineffective, unclear and not positively prepared. Additional policy wording is added to ensure the remainder of the policy wording is effective. **MM31** also amends the policy wording throughout the policy regarding the individual sub areas, to ensure reference is made to the inclusion of new residential development to support the regeneration of the Opportunity Area, which is a justified approach, consistent with national policy. Changes to part C of the policy to acknowledge that impacts of development on areas in close proximity to the Opportunity Area are appropriately managed will be effective in ensuring that these factors are taken into account in terms of any development proposals which may come forward and is a justified and effective approach. Corresponding changes are necessary through the modification to the supporting text. Subject to the modification outlined, the policy presents a sound approach.

Approach to town centres and retail needs over the Plan period

107. The evidence base has been updated through the Harrow Economic Needs Study Town Centres and Office Update, 2024 (EBLE01) which provides a quantitative and qualitative assessment of the need for new retail, leisure and other main town centre uses within Harrow. It identifies key town centre trends and changes. This report identifies that there is a requirement for 13,900 sqm m of combined retail, food/beverage, leisure and entertainment floorspace required over the Plan period. The Plan's approach to addressing this need is to reoccupy existing vacant floorspace which is estimated to be in the order of 21,000sqm of vacant retail and leisure floorspace. I consider this to be a sound approach.
108. Policy LE1 is named development principles and town centre hierarchy. This name does not accurately reflect the content of the policy as submitted. Accordingly, **MM32** is necessary to rename the policy development principles within centres and parades. Part A of the policy fails to define the different centres within the overall hierarchy of the Borough. Without this, the policy would not be effective when read together with Strategic Policy 04 and the relevant policies of the London Plan. The modification addresses this point and ensures that reference is made to the network of centres as defined on the policies map. This is necessary to ensure the policy wording is effective. The remaining part of the policy is amended to recognise the positive role

³ This text was deleted rather than struck through on the Main Modifications consultation.

that residential use can play within the defined centres, as well as providing greater clarity regarding the defined areas designated. Part H of the policy which relates to the loss of office floorspace and the application of a sequential approach is not effective as it is not clear how a decision maker should respond and it is inconsistent with national policy. The modification rectifies this by changing the reference to refer to main town centres uses, cross referencing to appendix 6 of the Plan which identifies marketing requirements. Corresponding changes are necessary to delete part H1 of the policy as a result as well as changes to the supporting text as a result. The submission Plan does not set out any marketing requirements, and this is addressed through **MM111** which sets out clearly how the marketing and vacancy requirements will be defined and assessed in relation to proposals coming forward. Subject to these modifications, the policy presents a sound approach.

109. The night time and evening economy are addressed by policy LE2. This is a positive policy approach towards assessing any proposals to enhance the evening and night time economy within and outside of the defined centres. Although the Plan recognises that Harrow generally does not have a well developed night time economy, it acknowledges that it does contribute to the overall economy. The policy as currently drafted repeats other policies within the Plan and imposes a requirement that all new facilities ensure all residents are able to partake in the activity, this policy wording is neither effective or justified by the evidence base. Accordingly, **MM33** deletes this text from the policy wording as well as deleting part E which is not positively prepared. The modification also adds a cross reference to appendix 6 dealing with marketing evidence which is also necessary for soundness. Subject to this modification, the policy presents a sound approach.
110. Policy LE5 addresses Tourism and Visitor Accommodation which identifies how the Plan will address proposals coming forward for new hotel development and serviced apartments. In common with other policy approaches contained within the Plan, Part A of the policy seeks to direct new developments of this nature to the HWOA and then identifies a sequential approach to look at other town centres, edge of centres and highly sustainable locations. This policy approach and in particular this focus on the most sustainable locations presents a sound approach that is in general conformity with the London Plan.
111. The Plan recognises that tourism is an integral part of the local and wider economy. This policy aims to focus any new hotel development or serviced apartments towards Harrow Town Centre and the wider HWOA. Part C of the policy deals with loss of tourism infrastructure. As drafted, part C of the policy is inconsistent with the London Plan which acknowledges the role that re-provision of these facilities can have. Accordingly, **MM35** is necessary to amend the policy requirement to state that proposals will be supported where there is no net loss through re-provision and makes associated changes to the supporting text. Subject to this modification, the policy presents a sound approach.

Conclusion

112. Subject to the MMs identified above the Plan presents a positively prepared, justified and effective approach towards the Opportunity area, economic growth, town centres and retail needs and is based on robust evidence, is justified and effective and consistent with National Policy and in general conformity with the London Plan.

Issue 6: Whether the Plan's approach to Tall Buildings, Design and Heritage matters is positively prepared, justified and effective and is this consistent with national policy and in general conformity with the London Plan?

Tall Buildings

113. The existing development management policies document has no specific policy concerning tall buildings or building heights. Accordingly, and in common with many other London Boroughs, and in response to London Plan policy D9, the Council prepared evidence to support the development of a policy approach to defining both appropriate locations for tall buildings within the Borough and the policy wording itself.

114. The evidence base to support this policy approach consists of the Harrow Characterisation and Tall Buildings Study 2021 (EBDH03) as well as the Harrow and Wealdstone Opportunity Area Tall Buildings Study 2024 (EBDH01). EBDH03 was completed in 2021. It assesses the existing character and identity of the individual neighbourhoods of the Borough and then provides a Borough-wide tall buildings character-led strategy on the basis of this assessment. It sets out an assessment of the existing typologies which prevail within the Borough in terms of built character, as well as an outline of the approach to understanding prevailing heights. This assessment has then informed the understanding of which locations may be appropriate for tall buildings.

115. EBDH01 focuses on the particular characteristics of the HWOA. The study identifies the clear policy context for the study, including both the Framework, National Design Guide and National Model Design Code as well as the London Plan. It sets out a clear methodology to the study, including an overall assessment of the location and character of the HWOA, built character of the area including an overview of what factors contribute to local distinctiveness in the area, transport and movement as well as natural character.

116. The study then goes on to consider individual character areas within the HWOA in terms of determining appropriate heights. In essence, the HWOA includes two of the largest town centres within Harrow, which include both the civic centre and industrial land. Both centres are linear in nature and are surrounded by residential hinterland. The study sets out the identification of suitable locations for tall buildings and appropriate heights, acknowledging that tall buildings provide the opportunity to create a transition in density and uses from the town centres to the surrounding residential neighbourhoods. The study also includes a thorough understanding and assessment of prevailing heights in the area. The findings of this evidence have fed into the policy wording as it appears within the Plan. This evidence base clearly follows the approach identified by the London Plan.

117. Both of these reports have formed the basis of policy GR4 and the approach adopted to the policy aligns with that set out at London Plan Policy D9. In particular, the definition of a tall building, as 21m in height or 7 storeys as measured from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure) aligns with policy D9A of the London Plan. Furthermore, the Council have identified an area within the policy that may be a suitable location for tall buildings which is the HWOA, and appropriate building heights are identified, including a cross reference to the policies map where building heights are defined. This part of the policy accords with part B of policy D9 of the London Plan.
118. Although the policy itself purports to address 'building heights' within the Borough, in reality this policy sets out the Council's approach to the location and assessment of tall buildings. As such, **MM9** amends not only the name of the policy, but also the policy wording to ensure that the definition of a tall building within Harrow is clear, and secondly, to identify where the Council consider tall buildings should be directed which is to the tall building zones, within the HWOA.
119. Historic England have expressed their support for the modification proposed as well as expressed a number of concerns regarding this modification. These relate to the deletion of part GR4C and suggested text which has not been carried forward from the agreed SoCG between the Council and Historic England. The text at part C and D of the policy which identifies where tall buildings should not be directed is not necessary for the policy to be effective. Part E of the policy sets out a number of design considerations. As drafted, the reference to wider context is ambiguous. **MM9** amends the wording of this part of the policy which is necessary for effectiveness. The modification also adds reference to exemplary design and protected views to ensure that it is clear how a decision maker should react to development proposals. The amendment to part E (c) is to correctly reference protected views which are defined within the plans glossary whereas local heritage views are not. This is necessary for the policy to be effective. The MM will mean that part E sets out clearly 'design considerations' which developments should address and the criteria identified here are detailed and extensively cover a range of design matters, including, in the first instance, whether the proposals would be appropriate for both the application site and adjoining areas outside the Opportunity Area, especially where a proposal may impact areas of significantly lower density and height. This wording clearly demonstrates the importance of design considerations in the context of any proposals which may come forward. The modification also amends part F of the policy wording to ensure it is positively prepared. As a result, and subject to this modification, the overall policy approach is a sound one.
120. With regards to the text from the agreed SoCG, it is my view that the MM outlined above adequately addresses my soundness concerns regarding the policy and its supporting text and the additional suggestions put forward and contained within the SoCG are not necessary for soundness.
121. Basement Development is addressed by policy GR4A. The policy presents a criteria based approach to the assessment of basement development within the Borough. **MM10** modifies the wording of part B of the policy to replace the reference to independent housing with self-contained homes – this is

ensure the policy wording is in general conformity with the London Plan. I have taken account of the suggestions from Transport for London (TfL) that the reference to car parking provision contained within the policy should be deleted, however the evidence before me does not persuade me that this is necessary for the policy to be sound and accordingly, I have not included it within the modification. The modification also adds additional supporting text at paragraph 2.0.11 to provide guidance for proposals for new basements within an Archaeological Priority Area in terms of consultation with the Greater London Archaeological Advisory Service. I have amended the wording of this text following the main modifications consultation for precision. Subject to this modification, the policy presets a sound approach to dealing with proposals for basement development within the Borough.

122. Policy GR5 deals with View Management through the Borough. The policy itself references the Harrow View Assessment 2024 as well as policy HC4 of the London Views Management Framework. **MM11** is necessary to amend the wording of parts E and G of the policy to ensure the policy wording refers to protected views which is necessary for the policy to be effective and to change maximised to secured in the policy wording to ensure the policy is sufficiently flexible. Subject to this modification, the policy presents a sound approach.

Design

123. Strategic Policy 01 addresses High Quality Growth. This policy identifies the strategic context to achieving high quality development within the Borough, and identifies 8 parts to the policy in order to achieve this. In particular, the policy sets out the existing range of unique characters within the Borough, and identifies where it is anticipated that growth can be accommodated, focusing on the HWOA as a location where higher density development can be accommodated. However, **MM5** is necessary to delete the reference to areas of special character (see **MM12** of policy GR6). Furthermore, the modification also adds additional wording to the policy to reference the promotion of healthy and sustainable places, it clarifies that the site allocations identified are shown as minimum development capacities and it updates a number of cross references within the supporting text. Subject to this modification, the overall policy approach is justified and effective and presents a sound approach.
124. Policy GR1 relates to achieving a high standard of development and covers a number of detailed criteria including design and layout considerations, residential amenity and accessibility. It presents detailed elements of good design, layout and amenity applicable to all scales of development. I recommend **MM6** to add additional wording to criteria B (c) to reference rivers and the riparian zone which is necessary to ensure the policy is effective, as well as removing duplication within the policy cross referencing the London Plan as well as the policy itself which is inconsistent with the Framework requirement to avoid unnecessary duplication, and the deletion of part i which does not serve a clear purpose. In addition, the MM also adds additional wording to the assessment criteria concerning residential amenity which is necessary to ensure the policy is effective. The modification also removes text at part C b, D and E which is also necessary to avoid unnecessary duplication. The modification also updates the supporting text to

ensure it is consistent with this overall approach. Subject to this modification, the policy presents a sound approach.

125. Policy GR3 addresses public realm and connecting places. The policy provides a framework for the assessment of proposals relating to public realm and provides a criteria based approach. **MM7** amends the policy wording as the reference to where appropriate is ambiguous and unclear and part B is not positively prepared. Changes to the supporting text to reflect these amendments are also included within the modification. Subject to this modification, this policy presents a sound approach.
126. Policy GR3B follows on from the above policy and deals with safety, security and resistance to hazards, within both public realm, new build and conversion of existing buildings. As drafted, it is not clear as to what schemes part B of the policy would be applicable to. **MM8** rectifies this by providing additional text to the policy wording to clarify that the policy would not be applicable to householder applications. This is necessary to ensure the policy is effective. Furthermore, the modification amends the policy wording at part B of the policy which is necessary to ensure that it is a justified and effective policy and to ensure the policy is positively prepared. Subject to this modification, the policy presents a sound approach.
127. Shopfronts and forecourts are addressed through policy GR8. The policy provides a criteria based approach to assessing proposals for shopfronts which includes blinds, canopies, front extensions and development on forecourts. As drafted, much of parts A c,d,e and B merely duplicate other policies contained within the Plan or the London Plan. **MM13** amends this by deleting parts of the existing text which is necessary for the policy to be effective. The modification also includes corresponding changes to the supporting text for the same reason. Subject to this modification, the policy presents a sound approach to dealing with shopfront and forecourts within the Borough.
128. Policy GR9 addresses outdoor advertisements, digital displays and hoardings and sets out a positive approach to the assessment of advertisements on buildings and freestanding units. However, two of the criteria within the submission Plan concerning security and residential amenity are covered by other policies within the Plan. Accordingly, **MM14** deletes this policy wording at parts A f and g. Other changes are included to the policy at parts i and C as well as the supporting text to ensure that the policy is positively prepared and effective. Subject to this modification, the policy presents a sound approach.

Heritage

129. Heritage matters within the Borough are addressed by Strategic Policy 02 and policy HE1. Strategic Policy 02 identifies the overall strategic policy for heritage matters. It presents a criteria based policy which seeks to deliver a positive policy framework for the conservation of the historic environment. As drafted, part A (e) of the policy is not justified insofar as it refers to views of the St Marys Church and Harrow on the Hill. **MM17** is necessary to make this policy wording effective and consistent with national policy, and this

modification also amends part C of the policy for the same reasons. Subject to this modification, this policy presents a sound approach.

130. Policy HE1 then deals with the Historic Environment in further detail and provides individual policy criteria to be applied to conservation areas, listed buildings, scheduled monuments, architectural assets, registered parks and gardens and then non designated heritage assets.
131. As drafted, the policy wording is not consistent with national policy nor does it reflect the Council's duties set out in section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which require that special attention is paid to the desirability of preserving or enhancing the character and appearance of conservation areas when assessing development proposals. As such, **MM18** is necessary to amend the wording of the policy with associated amendments to the supporting text. However, in light of the representations received from Historic England, I have retained the supporting text at paragraphs 3.1.14 and 3.1.15 which deal with non designated heritage assets within the Borough. The suggested additional supporting text regarding a review of Harrow's Archaeological Priority Areas is not necessary for soundness. Subject to the modification outlined above, the policy presents a sound approach.

Other Design Policies

132. Policy CN1 addresses Sustainable Design and Retrofitting in relation to new buildings as well as the retrofit of existing buildings. The evidence base to support this policy is set out within Delivering Net Zero: An evidence study to support planning policies 2023 (EBBC04). In light of this evidence, and the conclusions drawn, I am satisfied that the broad policy approach represents an appropriate policy basis for climate change mitigation. However as currently drafted, the policy wording is not positively prepared in terms of the precise wording of a number of the requirements of development proposals. **MM46** addresses this and subject to this modification, the policy presents a sound approach.
133. In the submission version of the Plan, the Council proposed policy GR6 to cover designated Areas of Special Character. The Council state that these areas have been carried over from the previous version of the Local Plan and that some areas are also covered by existing Conservation Area designations. The policy objective is to preserve or enhance the environmental, architectural, historic and landscape features of these parts of the Borough. However, there is no evidence base before me to support this proposed designation, or any suggestion as to how these Areas of Special Character have been assessed against any particular criteria. The Council have suggested that these designations have been long accepted as a matter of strategic value within Harrow. However, given the clear lack of any proportionate evidence base in this regard, the inclusion of such a designation in the Plan is not justified.' As a result, **MM12** recommends the deletion of this policy and any subsequent references to these Areas of Special Character within the Plan. There are also a number of other modifications where the reference to Areas of Special Character has been deleted (**MM5, MM79, MM82, MM84, MM109**). These are necessary for the Plan to be positively prepared. As I do not have the ability to recommend

changes to the policies map, it will be for the Council to update the policies map accordingly as identified within document LBH/ED34.

Conclusion

134. Subject to the MMs identified above the Plan's approach to Tall Buildings, Design and Heritage Matters is based on robust evidence, is sound and in general conformity with the London Plan.

Issue 7: Whether the Plan provides an appropriate strategy for the delivery of Environmental considerations and Green, Social and Community Infrastructure?

Infrastructure Delivery

135. The scope of infrastructure delivery envisaged over the plan period is identified within the IDP 2024 (EBIT01). It is referred to within Strategic Policy 01 as well as through the supporting text of the Plan relating to the implementation of other policies. Whilst I accept that this document is a live document, I raised concerns during the examination regarding the content of this document, particularly with regards to the range of measures identified and a lack of clarity regarding the delivery timeframe identified and how this relates to the level of growth identified over the plan period. This document was updated during the examination to ensure that it addresses the range of measures anticipated and their delivery timeframes, with reference to growth over the plan period. As a result, the updated the IDP document (03A_LBH Matter 3 appendix 1) is dated June 2025.
136. The updated IDP provides a comprehensive picture of the infrastructure projects which are necessary to support the planned level of growth. It not only identifies the type but also specifies the delivery timeframe and provides links to the associated evidence base for justification. In particular, it identifies a number of transport related infrastructure projects. Given the importance placed on supporting sustainable travel and protecting and enhancing sustainable transport infrastructure identified within the strategic objectives of the Plan, this is a necessary approach. I am content that for the purposes of the Plan before me, the IDP as drafted presents an appropriate basis which identifies the infrastructure requirements to support the level of growth proposed over the Plan period.

Social & Community Infrastructure

137. Strategic Policy 06 refers to both Social & Community Infrastructure. It provides the broad strategic policy framework for social infrastructure provision across the plan period and provides policy support for both the protection and enhancement of community services and provision, as well as setting out how proposals for additional provision will be assessed. However, the policy heading requires amending as according to the glossary definition within the Plan, social infrastructure also covers community infrastructure. Accordingly, **MM36** and **MM37** are necessary for the policy to be effective. The modification also amalgamates the wording of parts b and f of the policy

to avoid repetition, as well as deleting part e of the policy which refers to requiring all development to contribute to the delivery of strategic infrastructure identified within the Infrastructure Delivery Plan (IDP) as this is not a justified approach.

138. Policy CI1 deals with Safeguarding & Securing Social Infrastructure. It provides the policy approach by setting out how new social infrastructure will be assessed and then provides a policy approach for proposals relating to existing infrastructure. In the round, Part A of the policy outlines how proposals will be required to make contributions towards the provision of enhanced or new social infrastructure, in locations where there are existing capacity issues or a need is identified. Part B then sets out 5 criteria which will be taken into account in terms of proposals relating to new or enhanced social and community infrastructure. Part C advises that the Council will seek to retain and protect existing social infrastructure and community facilities from loss to alternative uses. It then identifies a 4 part criteria which will be used to assess such proposals should they come forward. Finally, part D of the policy states that any proposals to redevelop an existing social infrastructure site should prioritise the use of the site for an alternative social infrastructure use.
139. As drafted, the policy wording implies that new social infrastructure will be secured in locations where existing capacity issues or a need is identified. However, the Council have clarified that the intention of the policy is to secure the provision of enhanced or new social infrastructure where additional needs are generated. Accordingly, **MM38** is necessary to bring about this amendment to the policy wording for effectiveness. The modification also deletes the headings, amends the supporting text and clarifies the wording at part B (d) which is necessary for effectiveness. Finally, the modification amends the wording at part C of the policy to avoid unnecessary duplication which is necessary to ensure the policy is effective and deletes part D which is not positively prepared. Subject to this modification, the policy presents a sound approach.
140. Play and Informal Leisure is addressed by policy CI2. The policy provides specific criteria for assessing proposals in relation to development which is likely to be occupied or used by children and young people. The policy wording as drafted is not positively prepared in terms of the precise wording of a number of the requirements of the development proposals and this is addressed through **MM39**. Subject to this modification, the policy presents a sound approach.
141. Sport & Recreation within the Borough is addressed by policy CI3 which is a criteria based policy. As submitted, this is a 5 part policy which sets out how proposals for outdoor sport and recreation facilities will be assessed. The evidence base to underpin the policy approach adopted includes the London Borough of Harrow Indoor & Outdoor Sports Facilities Strategy 2024 (EBIT03). However, the submission Plan version of the policy makes no reference to indoor sports facilities and also includes references to certain criteria which duplicated parts of other policies within the Plan and in national policy, and is neither justified or consistent with national policy. Similarly, part C of the policy covers the provision of floodlighting which is already addressed by policy GR7 which deals with external lighting. **MM40** is

therefore necessary to amend these parts of the policy wording and reorder them for effectiveness. I have also amended the policy wording regarding the use of community use agreements and deleted cross references to other parts of the Plan which is unnecessary duplication. This modification will ensure the policy is consistent with the evidence base before me as well as national policy and will be effective in its application as a result.

142. The policy through which planning obligations will be secured is policy GR11. The policy wording identifies that planning obligations will be sought on a scheme-by-scheme basis, to secure affordable housing in relation to residential schemes, as well as to mitigate site specific impacts of a development proposal. As drafted, part B of the policy is not positively prepared. I recommend **MM16** to rectify this and also add additional wording concerning active transport to the policy wording and supporting text which is necessary for soundness.

Green Infrastructure

143. Strategic Policy 07: Green Infrastructure is a 13-part policy concerning green infrastructure within the Borough. The policy wording itself includes a lot of repetition, unnecessary cross references to other parts of the Plan and confusion between the use of the terms green infrastructure and green space. Furthermore, part D of the policy as drafted is not positively prepared and a modification is necessary to address this and acknowledge that small scale ancillary facilities needed to support or enhance the proper function of the open space, including sports facilities should be supported. As a result, **MM41** is necessary to amend the policy wording to ensure it is effective, justified and consistent with both national policy as well as the London Plan.

144. In addition to the above amendments, Green Infrastructure is defined within the Plan to include a network of blue and green spaces, parks and allotments, gardens and nature reserves as well as cemeteries, trees and woodland, green roofs and drainage systems. However, the submission Plan also includes sports pitches and playing fields within this definition which is inconsistent with the London Plan definition. Accordingly, **MM41** amends the supporting text to Strategic Policy 07 Green Infrastructure to adjust this definition. The modification also deletes the map on page 224 of the Plan which purports to illustrate green and blue infrastructure across the Borough as the Council have advised it does not provide an accurate representation of green infrastructure across the Borough. Its inclusion is therefore not justified.

145. Following on from the above strategic policy, Policy GI1 provides the policy framework for the assessment of development proposals affecting the Green Belt and Metropolitan Open Land (MoL). The Green Belt covers approximately 21% of the Borough. However, in terms of the policy wording, I am not satisfied that the policy as drafted is consistent with the Framework. This is because part A(b) of the policy refers to assessing effects on openness of development adjacent to the Green Belt which is beyond the scope of national policy. Accordingly, as drafted the policy is neither justified, effective or consistent with national policy. **MM42** amends this by removing part A(b) of the policy. Furthermore, parts C, D and F of the policy wording do not accord with the Framework, as they refer to a number of factors which are

not directly relevant to Green Belt matters. The modification is necessary to address this. This modification also necessitates changes to the supporting text. In addition, references to very special circumstances applicable to redevelopment opportunities in relation to sites GB1 and GB2 at part E of the policy is also deleted by the modification as defining within the Local Plan that special circumstances 'may' exist for enabling development is not an approach which is consistent with national policy. Furthermore, the modification deletes parts of the supporting text which are not relevant as the text refers to a strategic redevelopment opportunity which does not form part of this Plan. Subject to this modification outlined above, the policy presents a sound approach.

146. On a related matter, the Council are proposing a land swap within the MoL at Harrow on the Hill School. This is outlined as change MOL01 within document LBH/ED34. Whilst I have no ability to recommend an alteration to the policies map, it will be for the Council to bring about this change.
147. Policy GI2 addresses Open Space. The policy is split into 3 parts. Part A defines how development proposals affecting open space should be assessed. Part B relates specifically to major development and part C sets out a number of criteria in relation to existing open space. Part A of the policy seeks to define areas of open space deficiency within the Borough. However, there is no up-to-date evidence base to support such a policy approach. The last study being a PPG17 compliant report concerning Harrow's Open Spaces in 2011 (LBH/ED19 and LBH/ED19A) which does not reflect the approach outlined within the London Plan or national policy. Accordingly, this part of the policy does not present a justified or positively prepared approach and **MM43** is necessary to rectify this and also deletes the associated supporting text. Notwithstanding this lack of up-to-date evidence, this does not mean that the policy itself has not been positively prepared. This is because the policy as amended will allocate designated open space on the policies map, as well as setting individual criteria for the function of this designated space and assessing any development proposals which may come forward. In addition, this policy also seeks to secure new publicly accessible open space as part of any major development proposals.
148. The modification also includes a reference to standards within the London Plan at part B of the policy to ensure the policy wording is positively prepared. Turning to consider part C of the policy, as drafted, this would apply to sports pitches, recreational buildings and playing fields. However, sports provision is already covered by policy CI3. As a result, the modification also addresses the wording of this part of the policy to ensure it avoids unnecessary duplication. Subject to this modification, the policy presents a sound approach.
149. In recommending the above modification, I have taken account of other suggested changes, including requests that the Hive Football Centre be allocated as a sports venue within the Plan. However, the allocation of individual sports venues is not an approach otherwise pursued in the Plan. I am not convinced that this allocation is necessary to make the Plan sound and I have therefore not taken this forward as a proposed modification.

150. The Council are proposing a number of changes to the policies map concerning open space designations. These are identified through document LBH/ED34 (references OS01-OS11 inclusive). As I have no ability to amend the policies map, it will be for the Council to amend the policies map accordingly in light of these changes.
151. Biodiversity is dealt with by policy GI3 which concerns the protection of biodiversity and natural capital as well as biodiversity and nature recovery. As drafted, the policy provides a criteria based approach to the assessment of development proposals. Part G of the policy advises that all major and minor development proposals must be supported by a proportionate Biodiversity Net-Gain Plan which identifies how the development will minimise harm and maximise biodiversity gain. Proposals will be required to provide, amongst other things, a minimum of 2 biodiversity units per hectare to a minimum net uplift in biodiversity unit value of 15%, whichever is greater.
152. I am aware that the PPG states that Plan makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area wide basis or for specific allocations for development unless justified. In order to justify such policies, they will need to be evidenced including local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. The evidence base to support this policy consists of the Harrow Biodiversity Net Gain Working Paper (EBBC01). Although the document is marked as draft, the document remains unchanged for the purposes of this examination and remains as a working draft.
153. In terms of the viability evidence, I acknowledge that the plan level Viability Study (EBLE02) concludes that a 15% BNG would have a modest impact on residual land values and could be viably absorbed. However, the evidence concerning local need and local opportunity is less convincing. Whilst the Borough ranks low for sites of Importance for Nature Conservation (SINC), these are general statements rather than evidence itself of any particular local need. Similarly, the evidence concerning local opportunity is in the form of general statements. Overall, I am not convinced that the Council has provided sufficient evidence necessary to justify a higher percentage of the uplift in biodiversity value as sought by the policy. Accordingly, **MM44** amends the policy wording in this regard, and reduces the percentage of uplift in biodiversity unit value to 10% which is in accordance with the statutory objective. The modification also amends the policy wording of other criteria to ensure they are positively prepared, as well as the supporting text for consistency. Subject to this modification, the policy presents a sound approach.

Managing Waste & the Circular Economy

154. The overall strategic approach to Managing Waste & Supporting the Circular Economy is set out at Strategic Policy 09 contained within chapter 9 of the Plan. This policy sets out the strategic approach to sustainable development practices and to managing natural capital. It sets out the Council's overall approach to sustainable waste management which I consider to be sound. The policy is then followed by Policies CE1 and CE2. It is clear to me that

Policy CE2 merely repeats the wording of London Plan policy S17 which is inconsistent with the Framework which requires Plans to avoid unnecessary repetition. This is neither a justified or effective approach and accordingly, I recommend that the policy and its associated supporting text is deleted from the Plan through **MM51**.

155. Policy CE1 provides a criteria based approach towards managing and reducing waste, including a separate criteria based approach for flatted and other residential development. The policy as drafted is clear and effective, save for part B which repeats the London Plan requirements and is not a justified approach. Accordingly, I recommend **MM50** to delete this part of the policy wording. Subject to this modification, the policy presents a sound and justified approach.

Other Matters

156. Within Chapter 8 of the Plan which addresses responding to the Climate and Natural Emergency, there are three policies which require modifications for soundness and general conformity with the London Plan and I set these out below. Strategic Policy 08 addresses responding to the Climate and Nature Emergency. The policy covers a number of matters such as clean energy use, green mobility, the waste free economy, and healthy places. **MM45** is necessary to add additional text to the policy concerning ground water and land quality. This is necessary for the policy to be effective. Subject to this modification, the policy presents a sound approach.

157. Policy CN2 addresses energy infrastructure and sets out a policy approach to responding to a site specific assessment of effective and efficient energy supply options. Whilst I acknowledge that the policy itself is necessary to accord with the London Plan, part B of the policy merely repeats parts of London Plan policy SI3 which is not necessary for the policy to be effective. In addition, it is necessary for part D to be amended as the requirement for vehicle charging infrastructure is covered elsewhere within the Plan. Accordingly, I recommend **MM47** which amends this policy wording. The modification also includes for additions to the supporting text at paragraphs 8.2.5 and 8.2.6 which relates to sites crossed by or in close proximity to the National Grid Electricity Transmission. Subject to this modification, the policy presents a sound approach.

158. Policy CN3 deals with reducing flood risk. The policy sets out the broad approach including a criteria-based assessment to the design and layout of proposals requiring a flood risk assessment. The policy wording has been developed in conjunction with the Environment Agency, and this is evidenced through the SoCG with them (LBH/ED11). **MM48** is necessary to add additional text to part B of the policy, to ensure that there is a clear policy framework regarding proposals effecting flood zone 3b and to ensure the development requirements are positively prepared. This modification also amends the supporting text to reference the London Surface Water Strategy. Subject to this modification, the policy approach to reducing flood risk is sound.

159. In a similar manner, policy CN4 addresses the matter of sustainable drainage. The policy includes a requirement for development proposals to

incorporate sustainable urban drainage systems, where necessary to control discharge rates and reduce surface and storm water run off and the policy approach follows the drainage hierarchy identified within the London Plan and policy SI13. Subject to **MM49** which is necessary to ensure the policy wording is positively prepared and consistent with national policy, as well as adding additional text to the policy and supporting text concerning sustainable drainage systems (SuDS) the policy presents a sound approach.

Conclusion

160. For the reasons stated, and subject to the modifications identified, the Plan's strategy for the delivery of environmental considerations and green, social and community infrastructure is reasonable, appropriate and robust. The overall strategy and related policies on these matters have been positively prepared, are justified, effective and supported by reasoned and clear evidence. The approach is in conformity with the London Plan, consistent with the Framework and is therefore sound.

Issue 8: Whether the Plan provides a clear strategy for the site allocations proposed including whether the policy criteria are clear and precise and are the sites deliverable?

Introduction

161. The background evidence which sets out how the site allocations were selected for the Plan is identified within documents EBH01 Harrow Site Selection Methodology, February 2025 and EBH03 Site Selection Paper 2024. The first Paper identifies the overall policy context, whilst then defining the site selection methodology used to identify, assess and then select the sites contained within the Plan. Section 4 of this report clearly sets out the methodology used, the initial call for sites, eligibility sifting and the criteria used before stage 3 which includes the site selection and suitability assessment. It is clear to me that the exercise undertaken at stage 3 was a comprehensive one which focused on the spatial strategy adopted, including consideration of a range of factors such as whether the site was located within the HWOA, the site context and potential impact of any development on suburban character as well as the public transport accessibility level (PTAL) rating.

162. The results of the above were then used to complete stage 4 which is the detailed assessment and included consideration of site availability and deliverability. Site capacity was then subsequently set out at stage 5 which outlines how development capacity for each of the sites was established using a design led capacity approach. This report considers all of the proposed site allocations contained within the Plan, and follows the method published within the Site Capacity Design led approach produced as London Plan Guidance. In essence, the work includes a site analysis of each site, including a consideration of a number of factors which may affect layout, form and height of any development proposed such as heritage considerations and overall site context. This work then fed into a modelling exercise to assist in determining site capacity. A summary of each site assessment completed is then used. Where the quantum of floorspace identified within the site allocation is as a direct result of the design led

capacity work, the Council have subsequently applied a 10% further uplift to the residential capacity. This is justified on the basis of evidence from the detailed design process contained within this report and a number of examples have been used to illustrate this which compared average densities on existing allocations with consented densities and demonstrated that there was a 24% uplift across all site types and areas. On balance and in light of this evidence, I consider the application of a 10% uplift to present a justified and proportionate approach.

163. The above exercise resulted in the sites identified within chapter 11 of the Plan which contains all of the Council's proposed site allocations. The overall policy approach to the site allocations is set out at Policy GR12. **MM56** and **MM57** amend the supporting text at the start of the chapter to reference the delivery of the site allocations in relation to Policy GR12 which is necessary for consistency and effectiveness of the policy wording. Each of the site allocations identifies the most appropriate land use for the site and whilst the allocations themselves do not seek to repeat other policies contained within the Plan, they do identify particular development constraints which are pertinent to the allocation proposed through the Plan. Each of the allocations cover the same information including site information, site objective, allocated use, planning and development considerations as well as identifying the site in terms of the time frame for delivery at either years 1-5, 6-10 or 11-15 of the Plan period.
164. Hearing discussions included those focussed on the evidence which supported the phasing approach and the assumptions adopted by the Council in relation to a number of sites, particularly those which were considered to be deliverable and included in the 5-year housing land supply. It is evident that some significant delays between the resolution to grant planning permission and the completion of planning obligations has occurred and often extended beyond the Council's previous estimations. The Council were given the opportunity to justify the phasing and timelines for delivery set out within the Plan. This includes the latest evidence presented on this issue through an additional hearing as well as the main modifications recommended which adjust these timeframes in line with the evidence presented on this issue.
165. Whilst I acknowledge that these time periods have in the past extended beyond those currently envisaged by the Council, I am satisfied that the evidence before me presents a proportionate and justified approach on this matter and that the phasing and timeframes indicated for implementation of the site allocations identified are realistic. This evidence includes document LBH_ED29 which includes the updated housing trajectory and lead in and phasing assumptions information. Furthermore, I am also satisfied that the sites contained within the 5 year supply position meet the criteria identified within the Framework in terms of the definition of deliverable. That is to say, the sites are available now, offer a suitable location for development and there is a realistic prospect that housing will be delivered on the site within five years. The examination has also been presented with evidence that the delivery timescale should be brought forward to years 1-5 on sites such as OA1 and that a 6-10 year time period is too pessimistic. There is therefore clearly a balance to be struck in terms of the evidence presented on this matter and it is my view that the Council have taken a balanced yet realistic approach.

166. The sites are also listed within Chapter 11 of the Plan in terms of their indicative residential capacity and also contribution to the housing trajectory which provides a useful 'at a glance' overview of the sites covered within the Plan. Sites within the HWOA are prefixed with OA, other sites are prefixed with O and the two Green Belt sites are prefixed with GB. **MM58** updates the list of sites which are identified within the table on page 291 of the Plan. This modification amends the contribution to housing trajectory to instead specify minimum residential capacity as well as identifying a minimum non-residential capacity floorspace. It also updates the minimum residential capacity figure to ensure that the table is consistent with the individual site allocations which then follow and reflects the most up to date evidence on this matter and to ensure that housing delivery is achieved in line with the indicative trajectory provided. This is a justified approach insofar as ensuring development proposals deliver an efficient use of land. This is necessary for the Plan to be effective. Furthermore, the Plan provides a useful summary as to how the residential capacities have been arrived at, which builds on the evidence base contained within EBH03 and Appendix 1 to the Council's matter 6 hearing statement which is the Capacity Study report, as well as the evidence base I have outlined above. Subject to this modification, I conclude that this presents a sound approach.
167. In light of the updated housing trajectory and the latest evidence on this matter, a number of the site allocations require corresponding amendments to the policy wording to reflect this change. These modifications are necessary for the same reasons I have outlined above and to ensure the policies are effective in their application. This applies to site allocations OA1-OA17 inclusive as well as site allocations O1, O2, O3, O4, O7, O8, O9, O10, O11, O12, O14, O15, O16, O17, O18, O20, O21, O22. and these modifications are brought about by **MM61 – MM77** inclusive as well as **MM80, MM81, MM82, MM83, MM86, MM87, MM88, MM89, MM90, MM91, MM93, MM94, MM95, MM96, MM99, MM100, MM101** respectively. Subject to the modifications outlined, the approach is a sound one.
168. Furthermore, parts of the allocation text have also been deleted in relation to all of the site allocations which cover site source, supporting land uses, reference to former site allocation and use classes order as this text duplicates existing text and the policy is effective without it. For the avoidance of doubt, this applies to site allocation OA1- OA17 inclusive as well as site allocations GB1, GB2, and O1-O22 inclusive and these modifications are brought about by **MM61 – MM101** inclusive. Subject to the modifications outlined, the approach is a sound one. In reaching my findings, I have considered the potential for individual sites to be allocated for LSPBSL. As I have set out under issue 4 above, policy HO9 does not seek to allocate any specific sites for this use for the reasons I have already set out and I have already concluded that this presents a sound approach. I do not propose to revisit this issue in relation to the consideration of individual sites below.

Green Belt Site Allocations GB1 and GB2

169. The Council are not proposing any amendment to the Green Belt boundaries. However, they are proposing two site allocations to be contained within the existing Green Belt.

170. GB1 relates to the Royal National Orthopaedic Hospital (RNOH). This is an existing facility located within the Green Belt and the Plan proposes a housing allocation here for 500 dwellings linked to the modernisation of the hospital. Although the Council are not proposing the removal of this site from the Green Belt, they have also provided very limited information why the allocation of this site for residential use would be justified. Although I have been provided with some information concerning a previous and now lapsed planning permission on the site from 2023, I am not convinced that the allocation of the site for 500 dwellings is justified by the evidence before me. Accordingly, **MM78** is necessary to update the allocation wording and remove the housing numbers from the associated trajectory as well as adding additional text regarding the risk from surface water flooding which is necessary for the policy to be effective.
171. In terms of GB2, this proposed allocation relates to Watling Farm and the allocation of the site for an indicative figure of 12/13 gypsy and traveller pitches. This is not an effective approach. **MM79** amends this wording to express this figure as a minimum of 13 additional pitches which is necessary for effectiveness. The modification also adds additional text regarding the high risk of surface water flooding at the site as well as adding a reference to the nearby heritage asset of Watling Farm which is necessary for effectiveness.
172. The Council have provided detailed evidence concerning the extent to which the existing site can accommodate the additional pitches proposed. I am satisfied that subject to the modification outlined above, the policy wording as drafted is sound.

Harrow & Wealdstone Opportunity Area (HWOA) sites

173. The Council are proposing 17 site allocations within this area, which given its Opportunity Area status, encompasses the largest site allocations within the Plan.
174. Site OA1 is the Queen's House Car park site which is an existing multistorey car park and is identified as a location which is potentially suitable for a tall building development. A number of pre application meetings have been held with the Council, however as no formal application has been received as yet, it has been moved to delivery for years 6-10. **MM61** covers a number of amendments to the policy wording in relation to removing the requirement to reprovide car parking on the site which is not justified given the sites location within Harrow Town Centre. Instead, the modification introduces wording to reflect that any public car parking will need to be justified taking into account the existing supply of town centre parking in accordance with Local Plan Policy M2B. I consider this wording is necessary for the policy to be effective, whilst also ensuring that other similar site allocations which will include the loss of public car parking take a coordinated approach in this regard.
175. The modification also adds additional wording to reference the fact that that the site is at a high risk from surface water flooding. The policy also indicates that the site is appropriate for town centre uses and a residential floorspace capacity has been included within the policy. This figure has been informed through the site capacity plan level work carried out. This is appropriate

given that the site objective is to deliver a mixed use development that provides high quality residential homes and appropriate town centre uses. These amendments to the policy wording are necessary for precision and therefore the effectiveness of the policy. Subject to these changes, the allocation is sound.

176. Site OA2 is Harrow on the Hill Underground and Bus Stations. It comprises two sites which are separated by the underground lines and includes a 5 storey office block including a bus station and is located within Harrow Town Centre as well as the HWOA. The site has been subject to discussions with both TfL and Places for London. The allocation envisages that the site could deliver a landmark development including residential, town centre uses as well as a public transport hub. **MM62** amends the policy wording to highlight the high risk of surface water flooding, particularly along Station Approach. This is necessary to ensure the policy is effective. The modification also adds further detail regarding the enhancements to the bus station accommodation which is necessary for effectiveness. Subject to these changes, the allocation is sound.
177. Site OA3 comprises 15-29 College Road. The site description is amended by **MM63** to reflect the most up to date position. The site is allocated for its redevelopment to accommodate both residential and town centre uses which improve the public realm fronting College Road. Subject to these changes, the allocation is sound. Havelock Place is covered by site OA4 and this site is also allocated for both residential and town centre uses. There have been multiple pre application discussions with the Council however the timeframes indicated on the trajectory reflect the fact that the site may come forward in multiple phases. **MM64** amends the flood risk reference to acknowledge that part of the site is at risk from surface water flooding and also delete the cross reference to policy GR12 which is not necessary for the policy to be effective. Subject to these changes, the allocation is sound.
178. Site OA5 comprises Station Road East, Harrow. This site comprises both addresses fronting Station Road as well as Congress and Signal House which are on Lyon Road and the site is identified as being suitable for a major mixed use scheme, given the sites location within Harrow Town Centre as well as the HWOA. There is a current planning application being considered for part of the site, with pre application discussions underway on the remainder of the site. The trajectory envisages delivery between years 6-10 of the plan period. The site is allocated for residential with supporting town centre uses. **MM65** amends the flood risk to acknowledge that part of the site is at risk from surface water flooding. Subject to these changes, the allocation is sound.
179. The site referred to as Greenhill Way is covered by site OA6 and includes both the Greenhill Way Car Park as well as properties fronting Station Road including the former Debenhams site. The site is part owned by the Council, and the timescale on delivery reflect the most recent discussions with the numerous other landowners. The policy allocation recognises comprehensive redevelopment of the site for a mixture of town centre uses is suitable and the development principles section of the policy wording covers a number of important matters to be considered. The Plan envisages that the site will be redeveloped to provide both residential and town centre uses as well as

community /civic uses given the sites location within Harrow Town Centre. **MM66** amends the reference to NHS floorspace provision to ensure the policy wording is effective and introduces wording to reflect that any public car parking will need to be justified taking into account the existing supply of town centre parking in accordance with Local Plan Policy M2B. I consider this wording is necessary for the policy to be effective, whilst also ensuring that other similar site allocations which will include the loss of public car parking take a coordinated approach in this regard. Subject to these changes, the allocation is sound.

180. Site OA7 comprises the existing Tesco foodstore on Station Road and the Council are relying upon this site in terms of five year housing supply. The site is the subject of a current planning application and is to be determined imminently. In light of the evidence presented in relation to this site, I consider that this is a realistic timetable to adopt. The site is allocated for the redevelopment of the site to provide a mixed use scheme including the reprovision of the existing foodstore and associated parking, reflective of the current planning application on the site. The site is located within the identified tall buildings zone and the policy wording reflects this. The policy wording also identifies the requirements for an improved frontage to Hinds Road as well as improved pedestrian access to the site. **MM67** amends the flood risk to acknowledge that part of the site is at risk from surface water flooding and also adds additional text identifying that early engagement with Thames Water should be entered into, whilst ensuring that text regarding an appropriate level of car parking in line with London Plan standards is also added to the development principles section of the policy wording for consistency with the remainder of the policy. Subject to these changes, the allocation is sound.
181. The Former Royal Mail Postal Delivery Office on Elmgrove Road is covered by site allocation OA8. There have been extensive pre application discussions however as no formal planning application has been submitted, the site is indicated to deliver between years 6-10. **MM68** is necessary to amend the current use, as the site is currently an MOT centre and car showroom. The site is allocated for both industrial and residential use, as an industrial co location development, the policy wording also acknowledges that the site has a constrained access. Subject to these changes, the allocation is sound.
182. Site Allocation OA9 covers Poets Corner & Milton Road. This site comprises the former Council Civic Centre with large car park areas. The site is allocated for a mixed use scheme comprising residential with appropriate town centre uses, NHS floorspace provision and community use. This is also reflective of the recent resolution to grant planning permission for the site. The Council are relying upon this site in terms of five year housing supply. **MM69** amends the policy wording concerning the NHS floorspace as well as open space to ensure the policy is effective. The modification also amends the flood risk to acknowledge that part of the site is at risk from surface water flooding and also adds additional text identifying that early engagement with Thames Water should be entered into which is again necessary to ensure the policy is effective. Subject to these changes, the allocation is sound.

183. Site OA10 is a Council owned site and the site was formerly occupied by the Wealdstone Probation Office and is located to the south east of Wealdstone Town Centre. The site is now vacant and has been identified as a suitable site to provide hostel and employment uses to replace the accommodation at Vernon Lodge (O14). **MM70** amends the policy wording regarding flood risk to acknowledge that part of the site is at risk from surface water flooding. Subject to these changes, the allocation is sound.
184. OA11 is the now vacant existing car park at Ellen Webb Drive, formerly associated with Harrow & Wealdstone station. The site is owned by Network Rail and forms part of their land release programme. As there is active engagement with the landowner, but no formal planning application has come forward, the delivery timeframe is indicated at years 6-10. **MM71** amends the policy wording for effectiveness in relation to the allocated use, site objective and development considerations. The modification also amends the policy wording regarding flood risk to acknowledge that part of the site is at risk from surface water flooding. The allocation envisages a mixed use development providing residential and/or a hotel led scheme, appropriate to the sites location within town centre. As with the other site allocations, a minimum non residential floorspace capacity is also identified through the modification which has been derived from design led capacity work and I consider this to be appropriate given the town centre location. Subject to these changes, the allocation is sound.
185. The site at Peel Road is covered by site allocation OA12 and includes a multi storey car park known as Peel House as well as a place of worship. This is a further Council owned site which is being brought forward as part of the Harrow Strategic Development Partnership. It is located within the HWOA as well as the tall building zone and the Wealdstone town centre boundary. The allocation seeks to secure a mixed residential scheme with appropriate town centre uses and a place of worship. The allocation also emphasises the importance of improving the connectivity between the High Street and Byron Park through the site which would enhance pedestrian permeability in this area. **MM72** amends the allocated land use to remove the requirement for car parking and ensure the policy wording concerning NHS floorspace provision is effective. Instead, the modification introduces wording to reflect that any public car parking will need to be justified taking into account the existing supply of town centre parking in accordance with Local Plan Policy M2B. I consider this wording is necessary for the policy to be effective, whilst also ensuring that other similar site allocations which will include the loss of public car parking take a coordinated approach in this regard. Subject to these changes, the allocation is sound.
186. OA13 is the existing Travis Perkins Store at Wealdstone. Pre application discussions have been held with the landowner however no formal planning application has been submitted as yet. The site is located within a LSIS allocated for mixed industrial/ residential land use. **MM73** is necessary to amend the references to include Byron Recreation Ground under heritage matters which is necessary for the policy to be effective, as well as delete the reference to the use of Compulsory Purchase Powers where appropriate as this approach is not supported by the evidence base. Subject to these changes, the allocation is sound.

187. OA14 is Byron Quarter and comprises Harrow Leisure Centre and represents one of the largest site allocations within the Borough contained within the Plan. The site is located within both the HWOA as well as the tall buildings zone. The site has planning permission, and the allocation requires the refurbishment or replacement of the existing leisure facilities, with residential and community use. The Council are relying upon this site in terms of five year housing supply. Given the size of the site, the policy acknowledges that a phased approach is likely to be appropriate. **MM74** is necessary to amend the references to include Byron Recreation Ground under heritage matters which is necessary for the policy to be effective and also ensures the policy wording concerning NHS floorspace provision is effective. The modification also amends the policy wording regarding flood risk to acknowledge that part of the site is at risk from surface water flooding and also adds additional text identifying that early engagement with Thames Water should be entered into which is again necessary to ensure the policy is effective. Subject to these changes, the allocation is sound.
188. The Iceland store at Wealdstone is covered by site allocation OA15. This site comprises an existing supermarket and surface level car park and the site allocation is for both residential and retail land uses. The site is located within both the HWOA as well as the town centre. **MM75** amends the policy wording regarding flood risk to acknowledge that part of the site is at risk from surface water flooding. Subject to this change, the allocation is sound.
189. Site OA16 is the former Kodak Factory on Headstone Lane. The site benefits from an extensive planning history and there are currently two different residential elements being delivered on the site. The Council are relying upon this site in terms of five year housing supply, although the build out will continue into the 6-10 year period. The allocation recognises that the site can provide for both residential and residential institution land uses (including accommodation for older persons) with a number of other land uses identified such as industrial and employment, NHS floorspace, a primary school and community centre. **MM76** amends the policy wording regarding flood risk to acknowledge that part of the site is at risk from surface water flooding. It also amends the policy wording concerning the NHS floorspace. Furthermore, the minimum residential capacity figures are updated through this modification in light of the updated housing trajectory. These changes are necessary for the policy to be effective. In addition, the policy as drafted fails to list all of the relevant heritage assets which are in the vicinity of the site and the modification provides these which is necessary for the policy to be effective. Subject to this change, the allocation is sound.
190. Linked to OA16, the Former Kodak Administration Office is covered by site allocation OA17. The site has a resolution to grant planning permission and the premises have been vacant since 2018. The Council are relying upon this site in terms of five year housing supply. The site is located within a SIL, the tall buildings zone as well as the HWOA. The allocation is for flexible industrial related floorspace and residential land use. **MM77** amends the policy wording to reference the site as a LSIS not SIL following the SoCG with the GLA as this better reflects the changed context of the current SIL designation. This is necessary for the policy to be effective. Subject to these changes, the allocation is sound.

Other Sites

191. The Plan proposes 22 site allocations outside of the HWOA and these are set out below.
192. Site 01 covers the existing Waitrose Store in South Harrow. The Plan envisages the redevelopment of the site with the re-provision of the existing supermarket with residential development. **MM80** amends the policy wording regarding flood risk to acknowledge that part of the site is at risk from surface water flooding. It also amends the policy wording concerning the NHS floorspace as well as references to the re-provision of car parking in line with London Plan Standards. These changes are necessary for the policy to be effective. Subject to these changes, the allocation is sound.
193. Roxeth Library & Clinic is covered by site allocation 02. The site is located within the primary shopping area of South Harrow District Centre. **MM81** amends the policy wording regarding NHS floorspace provision to ensure the policy is effective. Subject to these changes, the allocation is sound.
194. Site 03 is Northolt Nursery and Car Park at the rear of 27 Northolt Road. This allocation comprises two Council owned sites which are allocated for residential, nursery and office use. **MM82** amends the policy wording to also reference the provision of designated open space as part of the site is located within an area of designated open space. The modification also amends the policy wording regarding the risk of surface water flooding. Both of these changes are necessary for the policy to be effective. Subject to these changes, the allocation is sound.
195. Grange Farm is covered by site 04. The allocation consists of the Grange Farm Estate which is a Council Housing Estate located in South Harrow. Planning permission has been granted for a three phase site wide regeneration scheme. The allocation envisages the regeneration of the remainder of the estate for residential, community and open space uses. The Council are relying upon this site in terms of five year housing supply although the build out will continue into the 6-10 year period. **MM83** amends the policy wording to also reference the provision of designated open space as part of the site is located within an area of designated open space. The modification also amends the policy wording regarding the risk of surface water flooding. Both of these changes are necessary for the policy to be effective. Subject to these changes, the allocation is sound.
196. Harrow School Estate & John Lyon School is addressed by site 05. The allocation covers over 11 hectares and includes both the estate of Harrow School and the John Lyon School which collectively occupy significant areas of Harrow on the Hill. **MM84** amends both the site objective and allocated land uses to ensure the wording is positively prepared and relates to the continuous improvement, maintenance and use of the assets located within the school estates. Subject to this modification, the allocation is sound. Although not linked to the site allocation, the Council are also proposing a land swap in connection with MoL within the boundary of the site allocation. This relates to a previous planning permission which was granted on appeal. It will be for the Council to update the policies map to reflect these changes.

197. Brethrens' Meeting Hall, the Ridgeway is site 06. This site is allocated for the provision of SEND education facilities. The allocation requires the provision of pedestrian access through to West Harrow Station, which should focus on extending the existing footpath which runs through the adjoining allotments. **MM85** amends the references to indicate the site is at high risk of surface water flooding which is necessary for the policy to be effective. Subject to these changes, the allocation is sound.
198. Rayners Lane Station car park is site 07. This is a linear site which runs parallel to the railway line. The site is allocated for mixed use residential led development. Although some concerns have been expressed that the minimum residential capacity of 76 units may not optimise the site, I am satisfied that this figure is appropriate as a minimum and it would be necessary to justify a higher figure could be appropriate through design led development work. The site boundary as shown on the Plan is incorrect as the retail units fronting Alexandra Road are not deliverable and so should be removed from the site boundary. **MM86** amends the inset map boundary and it will be for the Council to implement any subsequent changes necessary to the policies map. The modification also deletes the references to retaining or re-providing a sufficient level of car parking as this policy wording is not justified in relation to this allocation. Subject to these changes, the allocation is sound.
199. Site 08 is Harrow West Conservation Association. The site is located on the edge of Rayners Lane District Town Centre and is allocated for community or employment floorspace with residential. **MM87** amends the policy wording regarding flood risk to acknowledge that part of the site is at risk from surface water flooding. Subject to these changes, the allocation is sound.
200. Pinner Telephone Exchange is covered by site 09 and includes the Telephone Exchange Building which fronts Cannon Lane as well as the car park located to the rear of the site. The site is allocated for residential development. **MM88** amends the policy wording regarding flood risk to acknowledge that part of the site is at risk from surface water flooding as well as a risk of fluvial flooding from Yeading Brook. The modification also adds reference to the requirement for the re-provision of the designated open space as well as making the reference to environmental improvements to Yeading Brook more specific to ensure the policy wording is effective. Subject to these changes, the allocation is sound.
201. Harrow View Telephone Exchange is site 10 and is located on Harrow View which is surrounded by 2 and some 3 storey housing. The Plan allocates the site for residential development. **MM89** amends the policy wording under development considerations to refer to the green streetscape between existing buildings and Harrow View. This is to ensure the policy wording is effective. Subject to these changes, the allocation is sound.
202. Site 011 is known as North Harrow Methodist Church and includes a church, church halls, ancillary facilities and scout's premises. The site is allocated for church and community facilities with residential land use, and a limited level of town centre uses identified as being appropriate for this edge of centre location. **MM90** amends the policy wording regarding flood risk to acknowledge that the site is at a moderate risk of surface water flooding, this

is necessary for the policy to be effective. Subject to these changes, the allocation is sound.

203. A further telephone exchange site is Hatch End Telephone Exchange which is covered by site 012. The site is part owned by the Council and is located within Hatch End Local Centre and has a narrow frontage to Uxbridge Road.

MM91 amends the text regarding car parking provision to delete the text which states car parking should be retained, reprovided or relocated and replaces it with text that states that the reference to car parking provision should be in accordance with London Plan standards which is necessary to ensure the policy is positively prepared. Subject to these changes, the allocation is sound.

204. Harrow Arts Centre is site 013. It comprises part of the existing Arts Centre which includes the car park areas as well as a collection of existing ancillary outbuildings, but the site excludes the main Art Centre building which fronts Uxbridge Road. The allocation is for an Arts Centre and associated uses.

MM92 amends the development principles section to ensure the policy wording is effective and deletes text which references the adjoining Green Belt as this text is not justified. Subject to these changes, the allocation is sound.

205. Site 014 is Vernon Lodge which is a corner plot at the junction of Kenton Lane and Mountside. The site was previously a Council owned site, accommodating a purpose built two storey temporary housing development (now vacant). The application is for specialist older persons accommodation.

MM93 amends the policy wording regarding flood risk to acknowledge that the site is at a high risk of surface water flooding, and that safe access and egress routes should be directed to the north of the site. The modification also adds additional text to reference the requirement for a travel plan to demonstrate how sustainable travel patterns for residents of the site can be achieved and also add a further policy cross reference. These changes to the policy wording are necessary to ensure the policy is effective. I have also changed the policy worded to reflect the recent change of ownership since the consultation on the MM which is necessary for the effectiveness of the policy. Subject to these changes, the allocation is sound.

206. Belmont Clinic is site 015 and comprises an existing medical centre. The site is allocated for health care centre use with community; town centre uses and residential. **MM94** amends the policy wording regarding flood risk to acknowledge that the site is at a moderate risk of surface water flooding, and that safe access and egress routes should be directed to the south west of the site towards Kenton Lane. These changes are necessary to ensure the policy is effective. Subject to these changes, the allocation is sound.

207. The Travellers rest on Kenton Road is covered by site 016. It is currently operated as a Beefeater and Premier Inn and is located within the Kenton District Town Centre. The site has been subject to a recent planning application which was refused on design grounds and this application has been subsequently called in by the Mayor of London. The Council had advised that they are relying upon this site in terms of five year housing supply. However, there is insufficient evidence before me to support this position and accordingly I have moved the delivery timeframe to years 6-10 of the plan

period post the main modifications consultation. The allocated uses are modified through **MM95** to reference public house/ restaurant or bar use as well as residential. There is also an associated modification to the development principles text to reflect this change and to cross reference policy LE5 concerning tourism and visitor accommodation. This is necessary to ensure the policy allocation retains a flexible approach to any future redevelopment given the sites location. The modification also updates the PTAL rating which was incorrectly shown on the submission version of the Plan. The minimum residential and non residential capacity for the site which is updated through the modification has been informed by the design led capacity work completed for all of the site allocations. However, in light of the representations received at the main modifications stage, I have reduced down the amount of non residential floorspace specified within the policy wording to be reflective of the most recent planning application on the site. Finally, **MM95** amends the policy wording regarding flood risk to acknowledge that the site is at a risk of surface water flooding. This is necessary to ensure the policy wording is effective. Subject to these changes, the allocation is sound.

208. The Kenton Road Telephone Exchange is the final telephone exchange site and this is covered by site 017. It is located on Kenton Park Parade and is allocated for residential use with an appropriate town centre or community use on the ground floor. **MM96** is necessary to recognise that the site is at risk from fluvial flooding from Wealdstone Brook, as well as at a medium risk of surface water flooding with a small portion of the site at higher risk. Subject to these changes, the allocation is sound.
209. Wolstenholme is site 018 and comprises sheltered accommodation within a villa fronting Rectory Lane and a complex of buildings located to the rear. A previous planning permission on the site has now lapsed, and the delivery timeframe has been identified at years 11-15 as a result. The allocation seeks to secure specialist older person housing on the site which would provide a modern standard of accommodation. **MM97** is necessary to ensure the development principles section of the text adequately references the heritage assets in the vicinity of the site. This is necessary to ensure the policy is effective. Subject to this change, the allocation is sound.
210. The Marsh Lane Gas Holders are site 019. Although the Council proposed that the site be allocated for residential use, I am not convinced that the site presents a suitable location for residential use. This is due to the fact that there are significant easement and access requirements which place a constraint on the developable area of the site for residential land use. Furthermore, the freehold landowner has also advised that the site is not available for residential use. As a result, the policy presents neither a justified or effective site allocation and **MM98** deletes the proposed allocation from the Plan.
211. Canons Park Station car park is site allocation 020. This is a further linear site which runs parallel to the underground track. The site is allocated for residential and car park use. **MM99** amends the extent of the site area as shown on the inset map and removes part of the site which is covered by a long leasehold interest to the ambulance service which would not be deliverable. It will be necessary for the Council to make the associated

update to the policies map in light of this change. In addition, the modification also amends the policy wording to reflect the fact that a public car park to support multi modal travel should also be provided on the site and includes the associated policy reference. Whilst I note that TfL have objected to this modification, in my view this change is a justified and necessary approach to ensure the policy wording is effective in this regard. Although some concerns have been expressed that the minimum residential capacity of 29 units may not optimise the site, I am satisfied that this figure is appropriate as a minimum and it would be necessary to justify a higher figure could be appropriate through design led development work.

212. I note that the London Borough of Barnet have expressed concerns that the increase in minimum residential capacity for the site may have consequential impacts on Barnets roads although I have no technical evidence before me to support this assertion. I also note that the SoCG agreed between the London Borough of Harrow, Hillingdon, Ealing, Brent and Barnet (LBH/ED10) does not highlight any concerns in this regard. The number of units identified for this site has increased by 3 units through the main modification proposed and the modification ensures the policy wording references public car parking. Nevertheless, as with all the site allocations proposed which do not benefit from planning permission, the full impacts of any scheme proposals would be addressed at the planning application stage. Therefore, subject to these changes, the allocation is sound.
213. Anmer Lodge is site allocation 021 and comprises car parks located within Stanmore town centre behind buildings on the Broadway and Stanmore Hill. The site is allocated for residential land use along with town centre uses and car parking. There is an extant planning permission on the site and the Council are relying upon this site in terms of five year housing supply. The development principles of the policy also recognises that the site is an appropriate location for a supermarket. **MM100** amends the policy wording to reference the fact that the site is at a high risk of surface water flooding, particularly along the south east of the site. Subject to these changes, the allocation is sound.
214. The final site allocation outside of the HWOA is the Stanmore Station car park which is covered by site allocation 022. The site is allocated for residential use with car parking. The site area is incorrectly shown in the submission version of the Plan. This requires the inset map to be updated which is done through **MM101** to ensure the policy is effective. It will also be necessary for the Council to make the corresponding changes to the policies map. Whilst I understand concerns have been raised regarding the exclusion of land at the eastern extent of the site, this area of land is covered by a SINC and its exclusion from the site allocation, whilst not preventing landscaping or ecological improvements in this location, represents a justified and effective approach.
215. The modification also amends the policy wording to ensure that the references to car parking in the context of this site are clear, that the policy is referring to public station car parking and adds the relevant cross policy references. Although I note the representation made by TfL which states that they do not agree with this modification, the wording is necessary to ensure the policy is effective and is important given the existing high usage

of the car park and the importance of the station in terms of multi modal travel towards Wembley Stadium. In the case of this site, this is a proportionate and effective approach. The modification also adds text to reference that part of the site is at risk from surface water flooding. This is necessary to ensure that the policy is effective.

216. I note that the London Borough of Barnet have expressed concerns that the increase in minimum residential capacity for the site may have consequential impacts on the junction with the A5 and A410 although I have no technical evidence before me to support this assertion. I also note that the SoCG agreed between the London Borough of Harrow, Hillingdon, Ealing, Brent and Barnet (LBH/ED10) does not highlight any concerns in this regard. The number of units identified for this site has increased by 16 units through the main modification proposed and the modification ensures the policy wording references public car parking. It is likely that any scheme for the site would result in a significant reduction from the existing 446 car parking spaces currently accommodated on the site. Nevertheless, the full impacts of any scheme proposals would be addressed at the planning application stage.

217. Therefore, I consider the modification as presented to be a justified and effective approach in relation to this site. Subject to these changes, the allocation is sound.

Conclusion

218. Subject to the MMs which I have identified above, I conclude that in relation to issue 8 above the Plan provides a clear strategy for the site allocations proposed, the policy criteria are clear and precise and the sites are deliverable within the Plan period and therefore sound. .

Issue 9: Whether the Plan's approach to Transport and Movement provides a suitable framework to deliver the level of growth anticipated over the Plan period?

219. Chapter 10 of the Plan covers Transport and Movement. It contains one strategic policy in the form of Strategic Policy 10 which addresses movement within the Borough. The policy highlights how travel in Harrow will be designed and integrated around communities to support everyday journeys and drive long term sustainable growth, minimising private vehicle travel where possible. The policy then sets out a 7 part criteria based approach to assessing development proposals in the context of movement.

220. The policy as drafted is ineffective as it is not positively prepared and fails to provide appropriate wording concerning parking standards and delivering development that supports active travel. As drafted, it also repeats much of the London Policy. The policy also refers to improvements to road safety which is imprecise and ineffective as a result. **MM52** is therefore necessary as it amends the policy wording to address the above points, ensuring the revised working is precise, effective and positively prepared. The modification also amends the supporting text to provide an appropriate definition in relation to active travel which conforms with the definition provided by the London Plan, corrects references to the Harrow Long Term Transport Strategy which is no longer in a draft form and to clarify the relationship between Planning obligations and CIL payments which is not clear from the

Plan as currently drafted. These changes are necessary to ensure the policy is effective.

221. Policy M1 addresses Sustainable Transport and identifies an 8 part criteria based approach to assessing development proposals in the context of sustainable transport. As drafted, the policy wording is ineffective as it is not positively prepared, is imprecise as it fails to set the criteria in the context of active travel infrastructure and is imprecise in the context of cycle and pedestrian connections and routes within the Borough. **MM53** addresses these points by ensuring the policy wording is precise, effective and positively prepared. It also amends the policy wording to remove repetition from the London Plan which is necessary for effectiveness and to ensure the policy wording is positively prepared by referencing all relevant sustainable travel modes. Furthermore, the modification also adds additional text to part (C) of the policy concerning public transport accessibility which is again necessary to ensure that all relevant sustainable travel modes are included within the policy wording, with associated additional supporting text added. Subject to this modification, the policy presents a sound approach.
222. Policy M2 addresses parking within the Borough. The policy provides an appropriate cross reference to the London Plan parking standards and goes on to provide a criteria based approach to the assessment of parking provision in relation to development proposals. Chapter 1 of the Plan highlights under the Borough profile that Harrow has significantly higher rates of car ownership (75.2%) when compared to the London average (57.9%). Given the fact that several of the site allocations contained within the Plan would include the loss of existing car parking provision, it is necessary for the policy wording contained within policy M2 to address this car parking loss, particularly at strategic transport nodes, town centres or cultural and leisure nodes. This is necessary to ensure the policy is effective in this regard. **MM54** addresses this point and references an agreed local parking strategy within both the policy and the supporting text which is a justified and effective approach. The modification also amends the policy wording to delete repetition with the London Plan and remove duplication with other Plan policies and ensure that appropriate reference is made within the policy to the provision of accessible, secure and convenient cycle parking for all users which is also necessary for the policy to be effective. Corresponding amendments are also included within the modification to the supporting text. Subject to this modification, the policy presents a sound approach.
223. Policy M3 addresses deliveries, servicing and construction. The policy identifies a number of criteria in relation to deliveries, freight and servicing. The supporting text to the policy covers both construction logistics as well as deliveries and servicing. **MM55** is necessary to amend the policy wording at part A to reference the use of cargo bikes and zero emission vehicles for last mile deliveries and area or time restrictions on freight movement, this is necessary to ensure the importance of this element of last mile deliveries is acknowledged and to secure is a justified approach. The modification also amends the supporting text to appropriately cross reference that TfL Delivery and Service Plan guidance should be followed. Subject to this modification, the policy presents a sound approach.

Conclusion

224. Subject to the MMs identified above the Plan's approach to transport and movement is based on robust evidence, is justified and effective.

Issue 10: Whether the Plan sets out a suitable framework for the delivery, monitoring and implementation of the policies contained within the Plan and how the effectiveness of the Plan and its policies will be measured and assessed?

225. The Council has advised that the Annual Monitoring Reports will be used to report on the implementation, effectiveness and assessment of the policies contained within this Plan. The Council will then be in a position to assess whether any actions are required to support better outcomes.

226. Appendix 2 of the Plan identifies the monitoring indicators for the Plan. These are ineffective within the submission version of the Plan, with a number of key indicators either missing, containing incomplete wording or being unclear regarding what action maybe taken should targets identified not be achieved. In order to address this **MM107, MM108, MM109** set out changes necessary to the Plan to ensure that the monitoring framework provides a comprehensive mechanism to monitor the effectiveness of the Plan overall. These changes will also ensure the relevant targets are clear and provide a stronger link between the policies identified and the performance measures. They will also ensure the monitoring indicators are effective, consistent with national policy as well as the London Plan.

Conclusion

227. In light of the evidence presented regarding the delivery and monitoring of the Plan, I conclude that subject to the MMs identified above, the Plan sets out a clear framework for the monitoring, delivery and implementation of the Plan and its policies and how these will be measured and assessed. As a result, I conclude that the Plan and its policies are justified, effective, positively prepared and consistent with national policy.

Overall Conclusion and Recommendation

228. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

229. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the duty to cooperate has been met

and that with the recommended main modifications set out in the Appendix to this report, the Harrow Local Plan 2021-2041 satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound and in general conformity with the London Plan.

C Masters

Inspector

This report is accompanied by an Appendix containing the Main Modifications.