

Planning Policy

Harrow Council
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Station Road
Harrow
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Date: 14 February 2014

Boris Johnson, Mayor of London
(Further alterations to the London Plan)
City Hall
The Queen's Walk
London
SE1 2AA

Dear Mr Johnson,

Further Alternations to the London Plan

Harrow Council welcomes the opportunity to comment on the further alterations to the London Plan. In particular, we welcome the Plan's recognition of the strategic contribution that Harrow's growth area can make to meeting London's future housing and employment needs through its designation as an Opportunity Area. We look forward to continuing to work collaboratively with the GLA to realise the significant potential of this area for Harrow and the capital through targeted interventions and strategic investment in supporting infrastructure, including transport facilities. The Council considers such investment to be an essential basis on which the Opportunity Area should proceed.

The Council supports the vast majority of changes proposed. The attached table contains Council's representations to the proposed further alterations, highlighting those areas of support and those where further clarification could help to improve the policy.

If you would like to discuss any of the Council's representations in more detail, please contact Matthew Paterson, Head of Planning Policy, on 020 8736 6082 or matthew.paterson@harrow.gov.uk, who will be happy to discuss.

Kind Regards,

Caroline Bruce

Corporate Director of Environment & Enterprise

London Plan Further Alterations			
Representations of the London Borough of Harrow			Closing date: 10 April
LBH Ref No.	Page	Policy / Para	Representations
1	19	Figure 1.4	The figure could helpfully be updated to include the data up to 2013 thereby aligning with text at paragraph 1.20
2	34	Policy 1.1	The paragraph references at parts A & C of the Policy need updating.
3	34	Para 1.59	The references to 'Local Development Frameworks' needs to be updated to 'Local Plans' both here and throughout the document for consistency with current national and local terminology.
4	64	Policy 2.15C	The reference to applications for change of use from retail to residential as permitted development pre-empts a potential change to the Order to enact this. Given Harrow Council's strong opposition to this proposed change when consulted on by DCLG, the Council welcomes the alterations as providing for a more sound basis upon which to determining the acceptability of such prior approvals. The Mayor might also consider strengthening the policy further through the addition of criteria on maintaining active frontages at the street level and one on protecting the designated primary shopping area as the retail core of a centre.
5	64	Policy 2.15D	The alterations to the policy are supported and should ensure that existing higher order town centres remain the focus for new retail provision, maintaining their vitality and strategic role & function.
6	88	Para 3.19a	The Council considers that the requirement on boroughs to not only identify their five-year housing land supply, in accordance with the NPPF, but to also 'demonstrate that they have maximised the number of identified sites' is overly onerous. The methodology used in latest pan-London SHLAA was the most comprehensive and robust to date. Beyond the application of this methodology, it remains unclear what further evidence boroughs could supply to satisfy this new requirement. It is therefore recommended that this additional new requirement be deleted or that the text be further amended to clarify what will be expected of boroughs to satisfy this new requirement.
7	89	Policy 3.3Da	The Council considers this policy to be unnecessary as it repeats requirements already set out in Parts D & E, with respect boroughs achieving and exceeding their minimum housing target in Table 3.1 (Part D) and identifying additional housing capacity to supplement these targets (Part E). It is therefore recommended that the policy be deleted.
8	91	Table 3.1	The new annual average housing target for Harrow will be very challenging to achieve and will require the delivery of all allocated housing sites as well as maximising further potential development opportunities within its town centres as these arise. Any further increase above the new target figure would, in the Council's judgment, be undeliverable and would give rise to concerns as to the soundness of the Plan. Whilst, the Council recognises the increase in its target is necessary and that Harrow, like all London boroughs, must contribute to meeting London's need for additional housing, the Council maintains that such growth must be matched by investment in the social and physical infrastructure required to sustainably support the capital's growth. The Council therefore supports the efforts of the Mayor in seeking to make a stronger case to central government for control over future funding and investment to support the provision of the infrastructure London needs to remain successful and sustainable.

9	98	Policy 3.8Ba1	The Council strongly supports the reference in the policy to the contribution of the private rented sector in addressing housing need and welcomes the approach, here and elsewhere in the alterations, to increase supply to meet growing demand. However, the Mayor is requested to provide further clarity in the supporting text to the Policy that this should not impact negatively on affordable housing provision.
10	101	Paragraph 3.50c	It is unclear whether the indicative targets described within the paragraph and set out in Annex 5a for the provision of specialist housing for older people form a component of the borough strategic housing targets in Table 3.1. It is also unclear whether delivery against the targets needs to be monitored separately. The Mayor is requested to further amend the paragraph to provide this clarity.
11	102	Paragraph 3.53a first bullet point	The Council considers that specialist student housing should be located in close proximity to the higher education facilities to which the occupants of such housing attend, thereby minimising traffic impacts and encouraging cycling and walking. The Council would therefore recommend that the first bullet point be replaced or amended to include reference to Table 2.1 and therein, the outer London development centres for which higher education is of greater than sub-regional importance.
12	110	Paragraph 3.71	The Council supports the amendment regarding the need for developers to provide development appraisals demonstrating that the maximum amount of affordable housing is being provided.
13	122	Policy 3.19	It is unclear why it is being proposed to replace the well known term 'floodlighting' with 'sports lighting' within the Policy. The Council is concerned that this change in terminology does not give rise to ambiguity and would invite the Mayor to consider whether such a change adds clarity and is necessary.
14	145	Policy 4.8Bg	The Council welcomes and supports the amendments to the Policy to better manage clusters of uses within town centres. However, the Council considers that one of the significant impacts of clustering, in particular hot food takeaway uses, is on people's health and wellbeing. The Council therefore recommends that an additional sub-criterion should be added with regard to the health and wellbeing of communities, with a link provided to Policy 3.2.
15	146	Para 4.48A	The Council welcomes and support the amendment encouraging borough's to maintain and manage local public houses where there is evidence of need and where they are considered to be important and viable community assets. We would also support any efforts to strengthen this further, either through the Plan itself or through planning guidance, for example by requiring evidence of marketing and viability of sites before redevelopment is considered.
16	148	Policy 4.10Ac	The Council welcomes and supports the amendment that seeks to encourage and support affordable and more flexible office and research space for small companies and start-ups.
17	163	Policy 5.4A	Future gas and electricity infrastructure needs are a strategic planning issue that needs to be addressed at the regional and sub-regional level rather than being left to boroughs to address locally. The Council considers that this has been ineffective in the past and therefore welcomes this new policy and the commitment of the Mayor to work with boroughs and energy companies to better understand the gas and electricity requirements needed to accommodate London's growth. The Council hopes that this will see a reversal in past energy industry practices of reacting to rather than actively planning for growth. The Council therefore feels that the Mayor's engagement should go beyond simply promoting strategic investment and should extend to working with boroughs and DNOs to assess and determine future capacity requirements and

			constraints. The Council would therefore recommend that part D of the Policy is amended to state “Boroughs <u>and the Mayor will</u> work with the relevant energy companies...” The Council considers that such a requirement is already implicit if the Mayor is to satisfy Part C of the policy.
18	180	Policy 5.16A	The Council queries the evidence the Mayor has to support a reduction to the target year by which London is to be effectively self-sufficient in managing its waste within London. Further justification is required to reduce the target from 2031 to 2026.
19	192	Par 5.94A	The Council welcomes and supports the practical response to NPPF requirement to prepare Local Aggregates Assessments.
20	217	Policy 6.9	The Council welcomes and supports the amendments to the Policy to create and encourage an integrated cycle network. It is hoped that the funding to transport up to four outer London borough town centre into cycle friendly ‘mini-Hollands’ may be expended in the future to capture other outer London borough town centre that were not successful in the first round bids.
20	224	Policy 6.13C	The Council welcomes the recognition that much of outer London has very low levels of public accessibility, and there is little option other than private vehicle use and therefore the parking standards of the London Plan should be applied more flexibly in these instances. However, this should not reduce the impetus for the longer term strategic investment still required to improve the public transport accessibility of these neighbourhoods.
21	258	Policy 7.15	The Council welcomes and supports the amendments to the policy which it considers provides greater clarity as to the policy’s application.
22	287	Policy 8.1	The Council welcomes and supports the amendments to the Policy and the Mayor’s commitment to works with boroughs and infrastructure provides to ensure the effective development and delivery of the infrastructure London and boroughs need to support growth the and creation of sustainable communities.
23	290	Policy 8.2	The Council welcomes and supports the amendments to the types of infrastructure that will be afforded priority for planning obligations, recognising that CIL will, in the majority of instances, fund health and education provision. Therefore the elevation of social infrastructure, more generally, as a priority obligation, is strongly supported.
24	293	Policy 8.4	Given that the current Further Alterations stem from, and are predicated on, the need to accommodate levels of population growth not anticipated by previous iterations of the London Plan, the Council is concerned that the policy omits specific reference to the need to monitor London’s population growth at regular intervals over the Plan period. The Council therefore recommends that monitoring of the population projections underpinning the growth requirements of the Plan should form a key indicator and be reported alongside those for employment growth and housing delivery in the Annual Monitoring Report. The Council considers that this would allow for a clearer comparison of potential disparities between the population projections at paragraph 1.10E of the Plan and the annual projections provided by the Demography team, which are published independently from the AMR on the Datastore.
25	293	Policy 8.4	The Council would also suggest that the GLA give consideration to including household size as a key monitoring indicator, given its significance to the scale of household growth that London needs to plan for. Paragraph 1.15c states that this will be ‘closely monitored’ but the monitoring of such projections does not currently form part of the data provided through the AMR but is rather published independently on the Datastore and without reference to the assumed household size estimates underpinning the current Plan as

			set out in Paragraph 3.16.
26	302	Annex 1 – Harrow & Wealdstone	<p>The Council welcomes and is very supportive of the re-designation of the Harrow & Wealdstone Intensification Area as an Opportunity Area in the revised London Plan. The Council looks forward to working with the Mayor of London to realise the potential of the area in meeting Harrow’s and London’s growth requirements. It should be emphasised that investment in social and physical infrastructure to support growth, including transport facilities, must be an essential basis for the Opportunity Area to proceed. In particular, support from the Mayor (GLA & TfL) in upgrading Harrow on the Hill Station, ensuring this is accessible to all within the community, and continuing to provide much needed urban realm improvements expected of a Metropolitan town centre and required to support new retail and commercial development. Opportunities should also be explored for the redevelopment of Harrow Bus Station to provide an improved and more integrated transport hub. Further, we also welcome the involvement of the Mayor in the delivery of key strategic sites within the Harrow & Wealdstone Opportunity Area, in particular, support with site assembly and ensuring a new and consistent high quality urban design is created that can set the town centre on a new course of vitality, strengthening its importance as an asset to London and Harrow.</p>