

## **Appendix 3**

# **Harrow's New Local Plan Consultation (Reg 18) Consultation Statement – October 2024**

## 1. Overview

Between 26 February and 25 April 2024, the London Borough of Harrow ('the Council'), undertook a first round of consultation ('Regulation 18 Consultation 2024') to support the development of the new Harrow Local Plan 2021 – 2041 ('New Local Plan'). This document details how the consultation was undertaken and provides analysis of the feedback received.

The Council has been developing a new Local Plan to replace the current plan that was adopted in 2012 and 2013. In accordance with pertinent legislation, the Council undertook a Regulation 18 consultation as part of the development of this new plan. This initial statutory phase facilitates engagement from diverse stakeholders, spanning residents, developers, statutory bodies, and other interested parties, enabling them to contribute feedback on the evolving policies outlined in the draft document.

The legislation governing Regulation 18 consultation in the preparation of developing a new Local Plan is set out in The Town and Country Planning (Local Planning) (England) Regulations 2012.

The Council followed all relevant legislative guidelines dictating the conduct of public consultations. The Council also considered the specific local context and embraced established best practices from similar consultations. The methodology underpinning this approach is detailed in subsequent sections of this document, offering transparency and clarity regarding the framework employed.

During the consultation process, the Council received:

- a. 136 questionnaires via the Urban Intelligence platform (of which 90 were returned as pdf versions)
- b. 116 other non-statutory responses
- c. 30 responses from Statutory Consultees
- d. 3 petitions (signed by a total of 246 individuals)
- e. 45 questions from the public on Engagement HQ
- f. Public participation in three 'quick polls'
- g. Comments at six 'Street Events'
- h. Comments at the Conversation Café

In total, 1,094 direct comments were made by a range of respondents including statutory bodies, local groups and individual members of the public.

## 2. Call for sites

The Regulation 18 consultation included a 'Call for Sites' exercise – inviting sites over 0.25 ha to be put forward for consideration. 41 sites were submitted for consideration; these were assessed with respect to suitability, availability and achievability and were considered against a range of selection criteria for inclusion as site allocations in the Regulation 19 version of the Local Plan. The site selection process is set out in a separate report.

## 3. How the Consultation was Conducted

With any consultation ensuring that residents are aware it is happening, and with good notice, is key. This is particularly important on a Local Plan consultation given the broad reach and magnitude it has for the community.

The statutory requirements and Council's Statement of Community Involvement (SCI)<sup>1</sup> set out the minimum requirements for advertising a consultation. The advertising undertaken for this consultation is well in excess of these requirements as the widest possible range of views and opinions were sought.

### Pre-Election Period

During the consultation there was pre-election period for the election of Mayor of London and London Assembly Members which started on 18 March 2024. The Local Government Association define the pre-election period as "...the period of time immediately before elections or referendums when specific restrictions on communications activity are in place". Advice was sought from the Council's retained King's Counsel (KC) for the Local Plan who confirmed that this consultation was not in breach of the pre-election restrictions as no decisions would occur during that period.

It was decided to hold the main high-profile events, such as the 'Street Events' (detailed later in this document) ahead of the pre-election period commencing.

### Consultation Branding and Illustration

Frequently Council consultations use corporate colours and imagery which can disengage residents which are used to seeing it in other Council-related contexts. It was thought important that the 'look-and-feel' of this consultation was separate and eye-catching, but retained the same element of council branding, in this instance the corporate purple which acts as a golden thread through all branding.

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<sup>1</sup> <https://talk.harrow.gov.uk/23177/widgets/65711/documents/55002>

The design chosen as the hero image for the consultation features a colourful illustration of a number of recognisable Harrow landmarks, such as Katie's Statue. It also reflects both the urban and more rural makeup of the Borough.

# Harrow's New Local Plan 2021-2024

Initial Proposals (Regulation 18)



*Image: Consultation Document Front Cover*

## Static advertising Toblerone's

Using the consultation branding, 2m high recyclable 'Toblerone's' were ordered and placed in key locations across the borough. These displays are 100% recyclable and will be used for the later Regulation 19 consultation with slight modifications. They were displayed at the following locations for the duration of the consultation period:

- a. Greenhill Library
- b. Kenton Library
- c. Pinner Library
- d. Roxeth Library
- e. Stanmore Library
- f. Wealdstone Library
- g. Harrow Council Hub
- h. Harrow Leisure Centre

Images of the Toblerone's 'in-situ' are shown below:



**Display in Wealdstone Library**



**Display in Roxeth Library**

## Newspaper Advertisements

Full page advertisements were placed in the Harrow Times for two weeks (w/c 26<sup>th</sup> Feb and 3<sup>rd</sup> March 2024) alongside an online version on the website of the paper. The Harrow Times is the primary local newspaper and free of charge, it is also available in most libraries and other public locations. The internet version of the advertisement achieved 12,505 impressions in the first week and 12,501 in the second week.

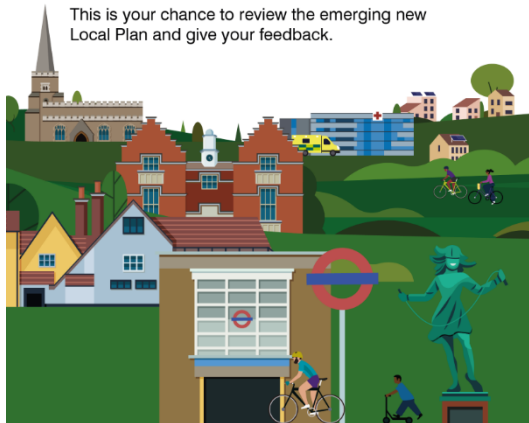
The newspaper advertisement is shown on the following page.

# Harrow's New Local Plan Consultation

The consultation is open between  
**26 February - 25 April**

The London Borough of Harrow is developing a new Local Plan. The Local Plan is crucial to shaping our approach to housing needs, economic sustainability, health and inequality, and protecting the suburban character of our borough.

This is your chance to review the emerging new Local Plan and give your feedback.



**You can also attend one of our street events:**

Location	Date	Time
Outside Rayners Lane Tube Station	Wed 28 Feb	9am - 1pm
Outside Wealdstone Library	Fri 1 Mar	11am - 3pm
Katie's Statue, Central Harrow	Sat 2 Mar	11am - 3pm
Broadway, Stanmore	Wed 6 Mar	12pm - 4pm
Outside South Harrow Library	Sat 9 Mar	11am - 3pm

Ways to get in touch:  
Email us at [LocalPlan@Harrow.gov.uk](mailto:LocalPlan@Harrow.gov.uk)  
Details can be found on our website  
Visit us at the 'Conversation Café' every Tuesday during the consultation between 10am-3pm at St Peter's Church, Sumner Road, West Harrow, HA1 4BX.

You can find out more by visiting  
[www.harrow.gov.uk/NewLocalPlan](http://www.harrow.gov.uk/NewLocalPlan)



**Copy of Newspaper Advert**

## Harrow People

Harrow People is a borough wide magazine produced by the Council and circulated to every household (approximately 100,000 copies). The magazine carried a full-page article about the consultation which was delivered to every household before 15<sup>th</sup> March 2024.

The article is shown on the following page.



# Unlocking the future

**W**e've launched a consultation on our draft Local Plan, which will help to shape development in Harrow and show what kind of borough we want to live in. The Local Plan will steer Harrow into the 2040s, so it's important that residents have their say.

The plan will show developers what kind of buildings we want and where, and it will balance important considerations like economic growth and housing with looking after the environment.

It's important that the plan supports the needs of local people. We want to use it to protect Harrow's special character and heritage, to encourage more family homes and keep those we already have. The Local Plan will also incorporate our guidance on tall buildings, which sets out that Harrow wants to keep its predominantly low-rise suburban character, with more height permitted in the town centre and Wealdstone.

The eight-week consultation is now open. Share your views and help shape the Harrow of tomorrow.

## Get involved

View the proposals, sign up for updates, and have your say at [harrow.gov.uk/newlocalplan](https://harrow.gov.uk/newlocalplan)

Visit us at the **Conversation Café** every Tuesday, 10am-3pm at St Peters Church, Sumner Road, HA1 4BX

View the plan at the Harrow Hub (by appointment) or at Greenhill Library.

Email [LocalPlan@harrow.gov.uk](mailto:LocalPlan@harrow.gov.uk)

Send us written comments to New Local Plan, Planning Policy Team, London Borough of Harrow, Forward Drive, Harrow, HA3 8FL



*Copy of Article in Harrow People (page 17)*

## Stakeholder Emails

Emails were sent at regular intervals to the Local Plan stakeholder database. The database comprises of 205 email addresses from individuals that have signed up for further information regarding the Local Plan / Planning Policy consultations.

A database of an additional 90 stakeholders was developed to reach specific parts of the community such as religious and faith groups, educational establishments, businesses, residents' groups etc.

A total of six rounds of emails were sent out to these databases during the consultation period. An example of one such email is shown below.

## **Harrow's New Local Plan - Consultation closes 25 April**



We have enjoyed meeting many of you over the past few weeks at our Street Events which were held across Harrow. Members of the Planning Policy team were on hand to listen to your feedback which will help to shape the Local Plan. We are keen to continue hearing your views. You can find details of how to provide feedback below. You can also visit our website <https://talk.harrow.gov.uk/harrowlocalplan>

**The consultation closes 25 April 2024.**

## **Answer our Quick Poll on Housing**

The New Local Plan will commit to the delivery of 802 new homes a year. The focus for new housing will be in the Harrow and Wealdstone Opportunity Area as it the most accessible location in the borough for public transport, retail / commercial uses and infrastructure. The plan also places an emphasis on delivering family homes. Further details about the proposed housing policies can be found in [Chapter 4](#).

***"Overall, do you agree with the New Local Plan's proposed approach to delivering Harrow's future housing needs?"***

[Agree](#) [Somewhat Agree](#) [Netural](#) [Somehwat Disagree](#) [Disagree](#)

***Screenshot of Stakeholder Email sent 4<sup>th</sup> April***

## **Council E-Newsletters**

Harrow Council issues a weekly e-newsletter which is distributed to around 130,000 email addresses. This newsletter regularly carried articles and information about the Local Plan consultation, and it was featured heavily in the opening week of the consultation.





1 March 2024

### Help us to shape the future of Harrow from Leader of the Council, Cllr Paul Osborn



This week we launched a major consultation that will help to shape the Harrow of tomorrow. Our draft Local Plan, when adopted, will guide development into the 2040s.

The plan is an opportunity to show what kind of borough we want to live in, what kind of buildings we want and where.

We want to use it to protect Harrow's character and heritage, encourage the building of more family homes and restrict inappropriate tall buildings. The consultation is now live online, and there are in-person events you can attend too - see further information below.

Local government finance has been in the news a lot lately. Like other councils, we've seen a significant increase in demand for services, including social care and housing, which are both very costly. We're all aware of rising prices in our daily lives, and the things that the council buys are affected in just the same way.

Thanks to careful financial planning, we've been able to deliver a balanced budget for the financial year ahead. This has allowed us to safeguard the services that you rightfully expect and invest in those areas where we've set our priorities. This means new money for services including road repairs, fly-tipping enforcement and street cleaning, where an extra £270,000 will help us to develop a more responsive, area-based service. You can find a detailed breakdown of our budget for 2024/25 [on the council's website](#).

It's the Covid19 Day of Reflection this weekend. As we reflect on this difficult time in our lives, we remember those we lost during the pandemic and the challenges that many people continue to face as a result of the virus.

Cllr Paul Osborn

### A plan for Harrow's future



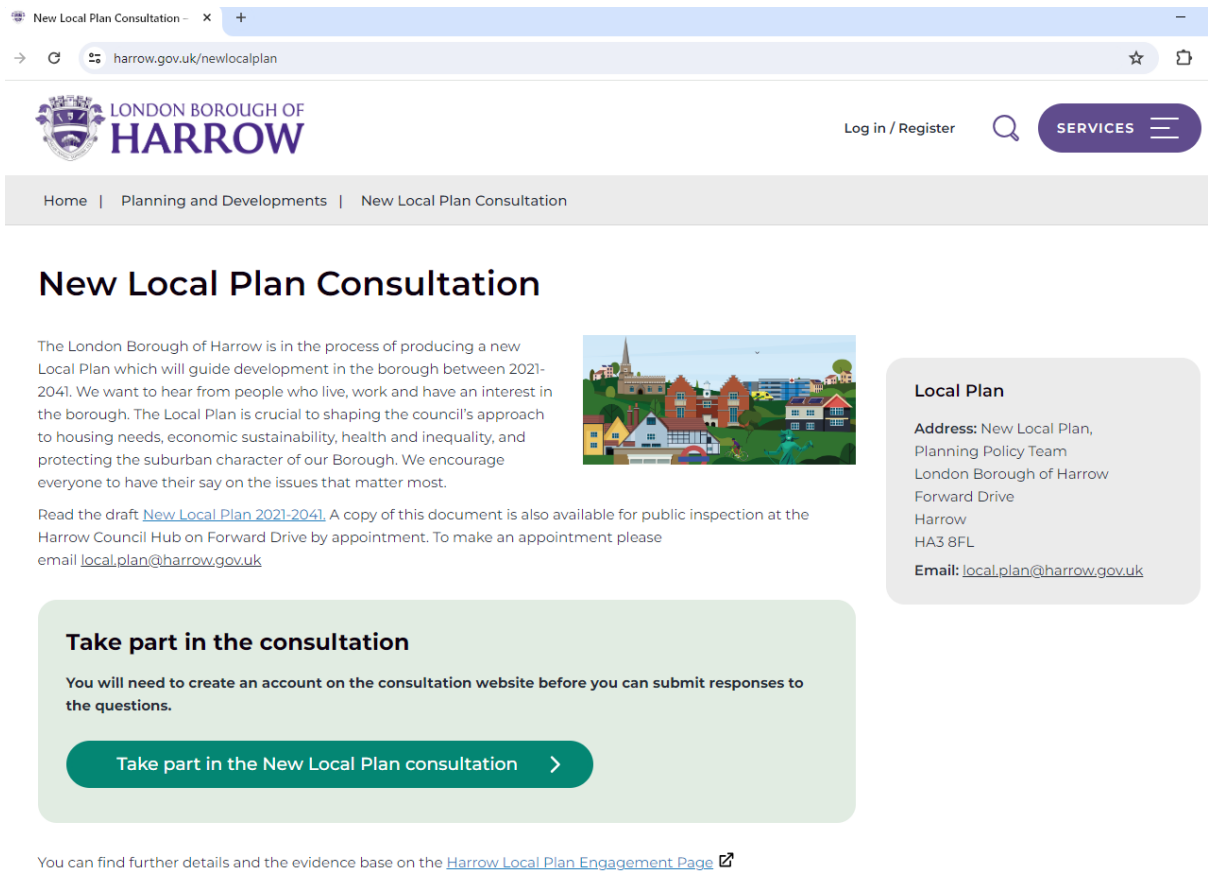
**Copy of Council e-newsletter sent 1 March**

## Council Websites

A dedicated webpage was made available on the Council website where residents and stakeholders can learn more about the New Local Plan. This was supported by the My Harrow Talk platform, which is the Council's dedicated consultation and engagement website.

### *Harrow website*

From the start of the consultation to the end of April, the [harrow.gov.uk/newlocalplan](http://harrow.gov.uk/newlocalplan) page had 855 views from 470 users.



**Screenshot of Council website**

*My Harrow Talk Platform*

During the course of the consultation there were 3,600 Site visits, with documents downloaded on 1,071 occasions. 45 queries/comments were made through the My Harrow Talk platform. A screenshot of the page is shown below.

### The New Harrow Local Plan 2021-2040

The London Borough of Harrow is producing a new Local Plan which will guide development in the borough between 2021-2041. We want to hear from people who live, work and have an interest in the borough. The Local Plan is crucial to shaping the council's approach to housing needs, the local economy, sustainability, health, inequality, and protecting the suburban character of our Borough. We encourage everyone to have their say on the issues that matter most.

This page has been set up to provide stakeholders with information on the new Harrow Local Plan including timelines, frequently asked questions, useful documents and relevant links. All consultation on the local plan will be run through this page, so please follow this project for updates.

#### What is a Local Plan?

Local Plans are documents that set out a vision and a framework for the future development of an area, addressing needs and opportunities in relation to housing, the economy, community facilities, infrastructure, the environment, climate change adaptation, and good design.

#### Why is the Harrow Local Plan important?

The policies within the Local Plan are used to guide development and decide planning applications. They also assist in the delivery of many Council services and priorities, such as the securing of affordable housing, achieving high quality development in the borough, managing the location, quantity, and quality of development, and promoting the vibrancy and vitality of our town centres.

All of these aspects help to fulfil the Council's priorities of putting residents first, and creating a borough that residents can be proud of.

The policies are set within the Local Plan for at least the next 5 years, so it is important to have your say on them, and help the council get it right.

#### Why does Harrow need a new Local Plan?

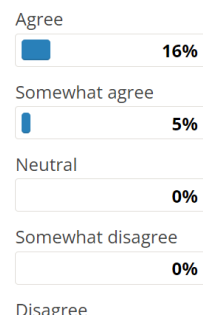
The current Local Plan was adopted in 2012 and 2013 and can be found [here](#).

REGISTER for project updates

#### Quick Polls



**Do you agree with the New Local Plan's proposed approach to delivering Harrow's future housing needs?**



**Screenshot of My Harrow Talk website**

## Statutory Consultees

54 statutory consultees were contacted as part of the Regulation 18 consultation. Two rounds of emails were sent to these consultees with tailored follow ups. Many of these consultees have been engaged throughout the preparation of the draft New Harrow Local Plan through the Duty to Cooperate process. A separate report has been prepared to document the wider and ongoing Duty to Cooperate Statement.

## Stakeholder Meetings

Offering stakeholders in the community and beyond the opportunity to meet is important for any robust consultation. Officers met with:

- NHS Health Urban Development Unit (HUDU)
- Residents of Rosen House
- NHS Property
- Local Account (Carers) Group
- Harrow Community Partnership
- The Pinner Society
- Stanmore Society



**Image from Local Account Group Meeting**

## Social Media

Harrow Council promoted the consultation on its social media profiles throughout. This included messaging about the location and timings of street events, advising people where to find further details and promoting the dates of the consultation. Examples of this are shown below.

**London Borough of Harrow** @harrow\_council · Mar 8

We've spoken to lots of you at our street events about Harrow's New Draft Local Plan. We have two more events this week.

We're outside Harrow Weald Waitrose today (Fri 8th), 11am-3pm. Tomorrow (Sat 9th) we're outside Roxeth Library, 11am-3pm

Visit [harrow.gov.uk/newlocalplan](https://harrow.gov.uk/newlocalplan)

**Harrow New Draft Local Plan  
Public Consultation**

**Street events w/c 4 March**

**Come find out more:**

@Harrow Weald, outside Waitrose  
Fri 8 March 11am-3pm

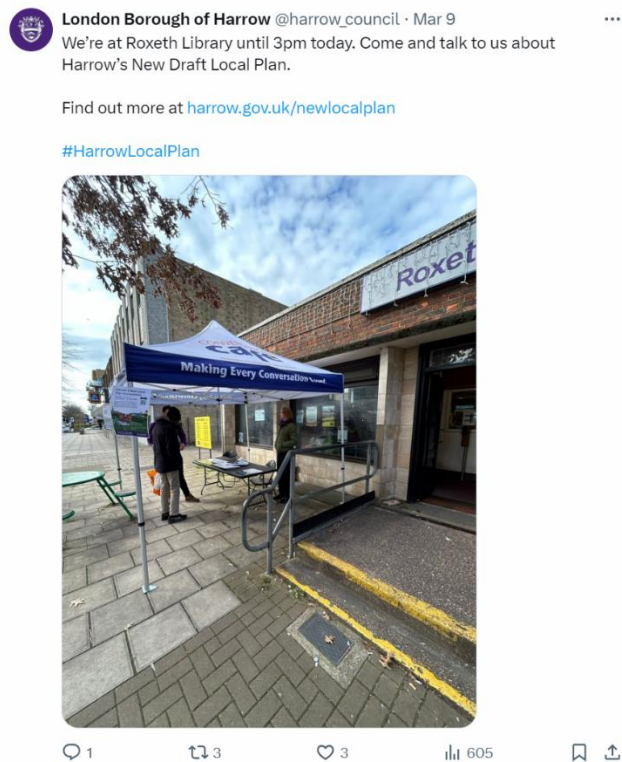
@South Harrow Library  
Sat 9 March 11am-3pm

[harrow.gov.uk/newlocalplan](https://harrow.gov.uk/newlocalplan)



LONDON BOROUGH OF  
**HARROW**

2 1 1 449



**Screenshots of social media messaging**

### Consultation Leaflet

An A5 consultation leaflet was designed and printed for use at Street Events, to be held at key locations around the borough, and to be distributed in the community. A total of 4,500 leaflets were distributed.



**Image: Front and rear side of consultation leaflet**

## Street Events

A series of six ‘Street Events’ were held at various locations around the borough between 28 February and 9 March. The Street Events represent one strand of a broader programme of engagement that is being undertaken to support community participation in the Regulation 18 Consultation on the New Local Plan.

The purpose of the events was to a) promote awareness of the New Local Plan in the community and b) to answer questions and receive feedback from the community.

Over the course of the six events there were interactions with hundreds of residents during which valuable feedback was received by the team. This feedback is summarised later in the document.

The events were scheduled to coincide with peak footfall times in each location. They were planned to include both weekdays and weekends, ensuring a broad outreach across the community in different parts of the borough.



Location	Date	Time	Approx Attendance*
Outside Rayners Lane Station	Wednesday 28th February	9am - 1pm	60
Outside Wealdstone Library	Friday 1st March	11am - 3pm	40
Katie's Statue, Central Harrow	Saturday 2nd March	11am - 3pm	90
Stanmore Broadway	Wednesday 6th March	12pm - 4pm	40
Outside Waitrose, Harrow Weald	Friday 8th March	11am-3pm	25
Outside South Harrow Library	Saturday 9th March	11am - 3pm	40

\*These are approximate figures based on direct interaction with members of the public. In addition, during the Street Events over 3,000 leaflets promoting the consultation were handed out.



**Event at Stanmore**



**Event at Rayners Lane**

### Conversation Café

The Conversation Café is a welcoming and safe drop-in session operated by the Council and well known in the community. It is for Harrow residents to meet face-to-face with staff from the Council and community partners. This offered those who wish to engage with us face-to-face, rather than digitally, another opportunity to ask questions and provide feedback.

Planning Policy Officers attended every session, which were held on Tuesdays, throughout the consultation period. Attendance at these events was promoted on all materials, including display boards, newspaper adverts and the website.

## Translation and Language Considerations

The statutory requirements for consulting on a Local Plan mean that publication of very complex technical information and data cannot be avoided. It is acknowledged that this makes it harder for consultees to navigate, especially if they do not have any understanding of Planning.

To help overcome the difficulty associated with reviewing Local Plan documents, the best approach is to supplement the information with easy-to-read plain-English explanations, visual aids, and provide a method to translate documents into a variety of languages.

As part of the consultation a highly visual 'Storymap' with chapter summaries, supported by graphics was developed. The Storymap took the consultee on a journey through the various chapters of the new Local Plan and sought feedback at regular intervals through a series of questions and multiple-choice answers. There was also an 'open text' section on every section to allow the consultee to provide additional commentary. The consultee was not limited to a response in this method, and submissions via email, letter, etc were still welcome.

Local authorities must comply with the Equalities Act 2010, however it does not set out a legal duty to translate documents into foreign languages. However, the Council's approach is to provide support in accessing documents in different languages where requested. The advent of modern technology such as Google Translate makes translation services easier than ever before. Not only are these services quick and highly accurate, they are cost effective and frequently used by large-scale consultations. Officers provided advice to any consultee requesting information on how to use this service.

The consultation website, as well as consultation emails, included information for how to request support to translate documents into foreign languages.

## 4. Feedback

### Street Event and Conversation Café Feedback

Overall, the feedback was a mix of concerns regarding infrastructure, affordability, the urban environment, specific local area issues and the effectiveness of development policies. There's a clear desire for improvement in infrastructure, affordability, cleanliness, and community services, along with support for environmental and social policies.

Infrastructure emerged as a significant issue, with concerns raised about the adequacy of support provided for new developments, including shortages of healthcare facilities, schools, and parking spaces. Additionally, housing affordability was a pressing concern, irrespective of whether it pertained to affordable housing or market-priced properties.

In Wealdstone, Rayners Lane and South Harrow specific attention was drawn to issues such as litter, limited shopping options/perceived decline in the quality of retail and high street offerings.

Concerns also extended to social and community aspects, with discussions revolving around the impacts of excessive development on traffic, crime rates, and the character of neighbourhoods. There was notable support for environmental initiatives and policies aimed at enhancing green spaces and the public realm.

These issues are expanded upon below.

#### **Apathy and Scepticism:**

- Lack of interest in planning due to perceived ineffectiveness of previous consultations in preventing applications being permitted.
- Scepticism about the ability of the new plan to address existing issues.
- Perception that the plan lacks significant changes and won't address Harrow's decline in attractiveness.

#### **Infrastructure Deficiency:**

- Concerns about inadequate infrastructure to support new developments, including healthcare facilities, schools, and parking.
- Lack of parking causing social issues and problems on the wider road network.
- Density of tall buildings exacerbate infrastructure issues.
- Need for additional public transport services.

#### **Affordability Issues:**

- A feeling that homes are unaffordable for locals, regardless of being affordable housing or market housing.
- Concerns about the lack of affordable housing in Harrow.

- Concerns about the affordability of new developments exacerbating the issue.

#### **Urban Environment:**

- Recent new build developments are perceived as too tall.
- Insufficient parking (as mentioned above).
- Negative impact of shop subdivisions in town centres.
- Litter, graffiti, and cleanliness issues in specific areas.
- Run-down centres, safety concerns, and desires for improved public realms and retail offerings.
- Lack of public bathrooms, particularly for people with children or those with disabilities.

#### **Local Area Specific Concerns:**

- Wealdstone: Food security, litter, limited shopping options, poor mix of shops.
- South Harrow: Departure of services, poor mix of shops, lack of pride, inadequate facilities like libraries and public toilets, protection of allotments.
- Rayners Lane: Decline in quality of shops, litter.

#### **Development and Housing:**

- Concerns about overdevelopment in the Opportunity Area contributing to traffic, crime, and loss of character.
- Apartments/flats perceived as unsuitable for families and of poor quality.
- Doubts about the viability and adequacy of infrastructure to support development.
- Need to consider provision, design and suitability of new buildings/family homes for people with disabilities, including mobility disabilities and ensure that wider spaces are also accessible and have suitable facilities such as disabled toilets and parking.

#### **Environmental and Social Policies:**

- Support for policies enhancing green spaces, biodiversity net gain, and net zero development.
- Concern about the affordability of net zero development policies.
- Desire for improvement in the cleanliness and safety of public spaces.
- Support for policies related to environmental standards, protection of the green belt and green spaces.

#### **Other comments:**

- Dislike for additional housing development expressed at street events.
- Positive responses to proposed opportunity areas, with some concerns about housing growth.
- Queries relating to plans for the Council's regeneration sites, particularly the former Civic centre.
- Several comments relating to specific planning applications or development sites.

## Summary of issues raised in written responses

Over a thousand individual written comments were submitted as part of the Regulation 18 consultation by a range of stakeholders including statutory bodies, neighbouring authorities, the development industry, local groups and members of the public.

All responses have been carefully considered by the Council. The key issues raised, together with the Council's responses and resultant changes to the Local Plan (where appropriate) are set out in the table in Appendix 1. These are broken down in relation to the different parts/chapters of the Local Plan and appendices.

## Main Issues

The main issues raised in the written responses replicate to some extent those made in person at events/meetings, conversation cafe and meetings reported above and can be summarised as follows:

### Consultation Strategy

- Communication strategies not comprehensive, or far-reaching enough.
- People excluded, e.g. residents who do not use social media or e-mails, or first language not English and those with disabilities.
- The local plan contains technical jargon, unnecessary detail and is too long.
- Some concerns about nature of the consultation and events including lack of interpretation for users.
- Feeling that this was a 'tick box' exercise.

### Growth and Spatial Strategy

- Most Statutory Consultees / Agents agree with the spatial strategy and directing growth to Opportunity Area
- A significant number of local representations disagree stating that growth should be spread more evenly across the borough and concerns around tall buildings, the changing character of the area and a perceived lack of infrastructure to support the amount of housing proposed.

### Design and Heritage

- General support for design and heritage policies.
- Need to consider provision, design and suitability of new buildings/family homes for people with disabilities, including mobility disabilities and ensure that wider spaces are also accessible and have suitable facilities such as disabled toilets and parking.

## **Tall Buildings**

- A significant amount of opposition towards tall buildings in terms of height and their location being concentrated in the Opportunity Area. This has been compounded in light of the Tesco development planning application submitted to the Council around the time consultation was being undertaken on the draft New Local Plan.
- Support from housebuilders / agents, for the tall buildings policies although some seek greater appropriate heights.

## **Housing**

- The housing chapter has had mixed support. There is significant support for the delivery of more family homes, affordable housing and additional controls on HMOs and flat conversions. There is mixed support for the backland, infill and small sites policies.
- Some comments from house builders raising concern with the Council's ability to meet the housing targets – and where this will be met given the Opportunity Area target (7,500 homes out of a total 16,040 homes for the plan period 2021-2041).
- Public representations expressed concern there is too much housing being sought – specifically about knock-on impacts on infrastructure.
- A number of agent/developer representations in support of the Large-Scale Purpose-Built Shared Living policies and are seeking to amend policy to be more supportive.

## **Employment**

- General support for economic policies with regard to retaining / creating jobs.
- Some concern expressed that the 1000 jobs target within the Opportunity Area may not be achievable given the floorspace pressure.

## **Infrastructure**

- Several public/non-statutory respondents stated that some forms of infrastructure in the borough were currently lacking and expressed the view that additional housing would place pressure on an already burdened infrastructure system. This has also been raised by stakeholders through the Infrastructure Delivery Plan (IDP) stakeholder engagement meetings.
- There is a perceived deficit in some infrastructure forms in the Opportunity Area (health services and schools etc)

## **Green infrastructure and Climate Change**

- Significant support shown toward the green infrastructure and climate change policies. There is a strong appetite to protect and enhance greenery, biodiversity, open spaces, and respond to the climate emergency.



- There is also support specifically around biodiversity net-gain (20%), although conversely there were also concerns raised about the justification for going above the mandatory 10% and the impact upon development deliverability and viability.

## **Transport and Movement**

- There is significant support for the transport and movement policies, particularly increased focus on public transport, active travel and support for EV charging.
- The parking policies have seen mixed responses as some groups advocate for modal shift away from car dominance to active transport, while others believe that reduced parking levels will exacerbate local parking issues.
- A local campaign centred around the Harrow Mosque argues for higher parking standards (in excess of the London Plan standards) and retention of existing car parking in the vicinity of the mosque.
- The Mayor of London / Transport for London have requested that we remove the 'minimum' parking standards stipulated in the current policy. This may become a matter of general conformity with the London Plan if not satisfactorily amended.

Appendix 2 includes a list of all respondents by reference number. For statutory bodies, groups, organisations, residents' associations, etc. the names of these are included. For petitions, suggest lead group/name is included. For members of the public suggest only ID numbers with initials are listed.

## **5. Changes made between Regulation 18 and Regulation 19 Local Plan**

The Council has carefully considered all responses made at the Regulation 18 stage and has proposed a number of changes as a direct result. The key changes made include:

### **Chapter 1- Borough Profile, Spatial Vision, Strategic Objectives**

- Borough Profile augmented to include greater reference to Harrow's heritage and water assets
- Changes to Vision, Strategy Objectives and Spatial Strategy to acknowledge importance of relevant assets and their management, commitment to addressing issues raised including the promotion of sustainable and cohesive communities.

### **Chapter 2- High Quality Growth**

- New policy on Inclusive Design to ensure that the built environment can be used safely and with dignity by all regardless of disability, age, gender, sexuality, ethnicity, or economic circumstances
- New policy on Basement development to ensure that basement development adhere to relevant design standards
- New policy on Safety and Security and Resilience to Emergency to ensure that development and public realm is safe for residents and visitors.

### **Chapter 3- Historic Environment**

- Amendments made across Chapter 3 to ensure consistency with heritage legislation and guidance including title change from Heritage to Historic Environment

### **Chapter 4- Housing**

- An updated position of the capacity of potential sources of housing supply against the housing requirement/target; and details of all the proposed housing and other allocations, their capacity, planning/design consideration are included (see new Chapter 11)
- Amendments in relation to the provision of genuinely affordable housing clarify that different types of products can be provided (including low-cost homeownership) to address the needs of households on a range of incomes
- Amendments so that the draft Plan indicates Build to Rent developments may be appropriate in accessible locations like the District/ Major Town Centres, in addition to Opportunity Area

- Amendments clarify the supply of older person homes will be monitored against needs and an updated needs assessment may be undertaken (if necessary)
- Updated text notes there may be instances where proposals may not be able to provide two bed housing of an adequate size to accommodate four persons
- Amendments included for older person accommodation, require a higher proportion of wheelchair accessible dwellings for products aimed at those aged 65 + and requires multi-functional spaces used by healthcare/ care professionals to be 100% wheelchair accessible in care homes
- The proposed amendments to the Large-Scale Purpose Built Shared Living (LSPBSL) Policy include; (1) the location where LSPBSL will be supported is within boundary of the Harrow Wealdstone Opportunity Area, which was previously only within the Harrow Metropolitan And Wealdstone District Centres. (2) In relation to the 250m test for assessing the over concentration of LSPBSL, the detailed criteria for assessing appropriate alternated uses for a site has been deleted. (3) in relation to the need for LSPBSL provide public amenities such as restaurant, cafe or leisure facilities, the new text clarifies the suitability of the location will be considered for this
- The Gypsy and Traveller (G & T) policy is proposed to provide up to 12 additional traveller pitches between 2022-32, based on the Draft / unpublished GLA needs assessment. The additional G & T pitch needs are proposed to be accommodated on the existing Council owned site at Watlings Farm, through expansion of its boundary.

## **Chapter 5: Local Economy**

- Further clarity has been provided within the supporting text to set out where and how new jobs may be supported, especially where outside of the Harrow & Wealdstone Opportunity Area in other centres and clustered around large employer institutions.

## **Chapter 6: Community Infrastructure**

- Clarifying that the matter of Burial Space is an ongoing infrastructure consideration and that a Needs Assessment has been undertaken. Further work will be done to find sites for expansion of Burial Space in line with the needs of the community.
- Clarification around the policy requirements for Sport and Recreation development.

## **Chapter 7: Green Infrastructure**

- Amendments that further emphasise the consideration for the historic environment.
- Clarification around the potential redevelopment of the Royal National Orthopaedic Hospital (RNOH) site and its context as part of the Green Belt.

- Amendments made to clarify that ancillary facilities may be an acceptable use on open spaces and signposting to development guidance from statutory authorities.
- Amendment of the proposed 20% biodiversity net gain requirement from 20% to 15%. Amendments to strengthen the draft policy by better grounding it in relevant legislation and terminology .
- Prioritisation of kerb space for greening measures.
- Signposting to guidance regarding green walls and fire safety.

### **Chapter 8: Responding to the Climate and Nature Emergency**

- Enhancement of consideration for the historic environment, particularly with regard to retrofit of buildings.
- Amendments made to highlight the challenge of water insecurity and additional requirements that must be met to ensure sustainable consumption and use of water in buildings.
- Clarification of expectations relating to foul and surface water flooding, and water contamination.

### **Chapter 9: Managing Waste and the Circular Economy**

- Introducing a requirement that refuse bins in developments be compatible with council refuse systems to ensure servicing from council collections.

### **Chapter 10: Movement**

- Highlighted several significant transport infrastructure projects.
- Introduction of the Council's EV planning objectives from the adopted EV Strategy.
- Clarification of parking requirements, particularly with respect to minimum requirements.

### **Chapter 11: Site Allocations**

- New chapter arising as a result of the call-for-sites process run in parallel with the Regulation 18 consultation and site selection process. It includes all of the site allocations that will contribute to meeting the plan's strategic/ spatial objectives. It includes site allocations for a range of development proposals including housing, industrial, commercial and Gypsies and Travellers. A series of templates are included for each site setting out the type and mix of development proposed, any planning constraints, design considerations and delivery timeframes.

Further detail of the proposed changes are included in Appendix 1.

## 6. Next Steps

The Council will carry out further public consultation at the Regulation 19 stage between 4 November and 16 December 2024 (6 weeks). In line with statutory requirements, responses to this consultation will have to be focussed on legal and 'soundness' issues. Further details of how to comment and consultation events and activities will be made available on the Council's website:

<https://www.harrow.gov.uk/planning-developments/new-local-plan-consultation>

## Appendix 1 – Consultation Statement: Summary of comments received at Regulation 18 consultation and proposed amendments to draft Plan

Key issues raised	Response	Proposed amendments
<b>General – covering responses relating to overall plan and engagement strategy issues</b>		
<p>A range of <b>general comments</b> made including:</p> <ul style="list-style-type: none"> <li>• Overdevelopment, tall buildings, infrastructure and quality of life issues in Harrow and Wealdstone Opportunity Area</li> <li>• Need to spread development more to other parts of borough</li> <li>• Plan lacks ambition to make necessary improvements to make Harrow a more attractive destination for shopping and other services</li> <li>• Parking in borough is a major issue that needs to be addressed</li> <li>• Concern about state of high streets in borough which are run down, dirty, dangerous and cluttered</li> <li>• Need for development proposals to consider health impact assessments</li> <li>• Need quality jobs and business opportunities</li> <li>• Lack of affordable housing</li> <li>• Property design needs to be sympathetic to surrounding buildings and less flats</li> <li>• Concern about levels of traffic and safety for pedestrians, cyclists and equestrians</li> </ul>	<p>These cover a range of issues that are addressed through individual chapters/parts of the Local Plan.</p>	<p>Changes considered through individual chapters/parts of the Local Plan.</p>



Key issues raised	Response	Proposed amendments
<ul style="list-style-type: none"> <li>• There is no sufficient explanation of the link between the old Local Plan and this proposed new plan</li> <li>• Some support for overall spatial strategy and policies on green spaces, protecting green belt, active travel, sustainable transport including walking and cycle networks, food growing.</li> </ul>		
<p>Several responses were made in relation to the <b>consultation process</b>:</p> <ul style="list-style-type: none"> <li>• Communication strategies not comprehensive, or far-reaching</li> <li>• People excluded, e.g. residents who do not use social media or e-mails, or first language not English and those with disabilities</li> <li>• Over reliance on social media/online methods and not on traditional methods such as letters</li> <li>• Online survey not designed well, superficial and only solicited positive/neutral feedback rather than a critical analysis of the local plan.</li> <li>• Face-to-face consultation sessions needed more notice for residents</li> <li>• Presentation materials at the face-to-face consultation did not provide sufficient information.</li> <li>• Council is just doing a tick box exercise in consultation to meet the minimal statutory requirements and with no intention to hear the</li> </ul>	<ul style="list-style-type: none"> <li>• The Regulation 18 consultation was undertaken in accordance with relevant legislation and the Councils adopted Statement of Community Involvement. This set out how the Council would engage with residents, organisations and statutory consultees.</li> <li>• The Council is satisfied that the consultation has been carried out in accordance with all relevant legislation and in many areas has met 'best practice' industry standards.</li> <li>• Whilst every effort has been made to keep the draft Local Plan simple, easy to read and suitably brief, it remains a technical planning document covering a number of topics, where technical jargon is unavoidable and necessary.</li> <li>• Stakeholder meetings were held with resident local groups where officers provided as much information as</li> </ul>	<p>No specific changes required to the Local Plan.</p>

Key issues raised	Response	Proposed amendments
<p>voices and solicit contributions from the residents.</p> <ul style="list-style-type: none"> <li>• Inability to find relevant supporting documents (Integrated Impact Assessment)</li> <li>• The local plan contains jargon, unnecessary details, repetition of content, contradictions and inconsistencies. And is too long.</li> <li>• Sign language experts and interpreters were not provided at the face-to-face consultations.</li> </ul>	<p>possible and were on hand to answer any questions.</p> <ul style="list-style-type: none"> <li>• All supporting documents and evidence base were located on the Council's website and Engagement HQ platform.</li> <li>• The consultation was publicised in a number of ways including the local press, newsletters, website, emails etc.</li> <li>• A non-technical storymap was included on-line and provided summaries of the key issues to make the process more accessible to the public.</li> <li>• Whilst specific questions were asked, the survey also allowed 'freetext' responses to be made on any aspect of the plan.</li> <li>• The consultation was carried out across a number of formats, including street events and meetings with community groups.</li> <li>• Officers were on hand at street events and meetings to deal with any questions.</li> <li>• Assistance with translation of consultation documents was also made available on request.</li> </ul>	

Key issues raised	Response	Proposed amendments
<p>Multiple (90) duplicate PDF responses (ID Ref?) were received that centred on <b>carparking around Harrow Central Mosque</b> raising the following points:</p> <ul style="list-style-type: none"> <li>• The proposed development in the Opportunity Area is substantial and without the required level of parking</li> <li>• Why are the more deprived Wards targeted? Development in Marlborough, Wealdstone and Greenhill should have same parking standards apply</li> <li>• It is unfair to discriminate against the protected characteristic groups of faith and race.</li> <li>• Poets Corner development is proposed to be intensified with development without parking. The needs of the large and busy Harrow Central Mosque, adjacent to the site, and the Muslim community using it have not been taken into account</li> <li>• The Civic Centre site is used for parking making the Mosque and community hub accessible. Redeveloping the site and not providing any parking space will have a detrimental and substantial impact on the Mosque, its worshipers and community, affecting these protected characteristic groups of faith and race. Parking should be provided for the Mosque and the new residents.</li> <li>• This can be achieved by reducing the number of the proposed development flats and building</li> </ul>	<ul style="list-style-type: none"> <li>• The new Harrow Local Plan is required to be in conformity with the London Plan which identifies the Harrow and Wealdstone Opportunity Area (HWOA) as capable of delivering around 5,000 new homes and 1,000 new jobs up to 2041.</li> <li>• The HWOA is by its very nature a sustainable location for new development and growth given its highly urbanised and town centre characteristics (that includes Harrow Metropolitan Town Centre and Wealdstone District Centre linked by Station Road) and its high transport accessibility via Harrow on the Hill LUL and Harrow and Wealdstone stations.</li> <li>• The spatial strategy in the emerging Harrow Local Plan therefore seeks to direct a significant proportion of housing and employment development into this area, to accommodate a minimum of 7,500 homes. This represents around half of the total housing needed for Harrow up to 2041, with the remaining half to be spread throughout the borough's other smaller town centres.</li> </ul>	<p>No specific changes required to the Local Plan.</p>

Key issues raised	Response	Proposed amendments
<p>those through the borough, rather than targeting all of the detrimental impact in Marlborough and its community.</p> <ul style="list-style-type: none"> <li>• Adequate parking should be provided in accordance with the London Plan to assist with access and mobility, support economic activity, balance transportation modes, reduce congestion and pollution and support housing and development, support visitor and tourist accommodation.</li> <li>• According to the London Plan, faith-based communities and places of worship should have car parking provision for several reasons including accessibility for worshippers with mobility limitations, help improve community engagement, enhancing the safety and security of worshippers, minimizing the impact of parking overflow onto neighbouring streets, supporting those who rely on private cars whilst promoting other sustainable modes of transport and supports the exercise of religious freedom by ensuring that individuals can attend religious services and activities without facing barriers related to transportation and parking availability</li> <li>• From a protected characteristic Equality, Diversity, and Inclusion (EDI) group perspective, additional arguments supporting car parking provision for religious communities, in line with the London Plan, including Accessibility for</li> </ul>	<ul style="list-style-type: none"> <li>• This is considered to be the most sustainable strategy for Harrow reflecting the opportunities to regenerate the commercial core of the borough, including the tackling of deprivation in this area, and to revitalise all town centres in the borough.</li> <li>• It also recognises there are more constraints to development in the suburban parts of the Borough due to their environmental, landscape and heritage designations. To that extent growth around the borough is spread in a rational manner.</li> <li>• The supporting evidence base to the local plan in the form of character and tall building studies also clearly demonstrates that parts of the HWOA are considered suitable for taller buildings having regard to character constraints and accessibility factors.</li> <li>• The spatial strategy and tall buildings strategy for the new Harrow Local Plan has therefore been derived from sound planning principles and robust evidence base. They do not in any way seek to discriminate against particular groups including those with protected</li> </ul>	

Key issues raised	Response	Proposed amendments
<p>Disabled Individuals, Supporting Cultural and Community Needs, Promoting Social Cohesion, Respecting Religious Freedom, Enhancing Neighbourhood Harmony, Sustainable Transportation Considerations</p>	<p>characteristics. Both the London Plan and the Local Plan are subject to Equalities Impact Assessments which ensure that there is no discrimination on the basis of race, faith or economic status. No such issues have been identified in association with the Opportunity Area.</p> <ul style="list-style-type: none"> <li>• In terms of parking provision, all future development in the HWOA will need to comply with the London Plan parking standards. Whilst these standards differentiate between different types of developments and locations, including accessibility levels (PTAL), they are not intended to be discriminatory between different places and/or groups. The London Plan requires that car free development be the starting point for any planning proposal in sustainable locations with high PTAL levels such as within parts of the HWOA.</li> <li>• It is recognised that the Harrow Central Mosque forms an important community and landmark feature within the HWOA, and in terms of its parking requirements, it currently partly relies on spaces associated with the former Civic Centre building. The</li> </ul>	

Key issues raised	Response	Proposed amendments
	<p>redevelopment of this site (known as Poets Corner) is still in the planning phase. The primary aim of the proposed development a is to improve the provision of housing and community facilities in the area generally. The removal of the parking per se is not considered to amount to discrimination on the basis of faith or race in any form.</p> <ul style="list-style-type: none"> <li>• However, the Council recognises that there are benefits to suitable and adequate town centre parking provision, and that town centre parking as a whole needs to be re-appraised within the area. This has to be done within the context of the NPPF's and London Plan's requirement to reduce reliance on the car as a whole and promote more sustainable forms of transport.</li> <li>• Further work on parking for the Harrow Town Centre is proposed as part of a masterplan for the area, and the Council will seek to work with the Mosque and community leaders to address concerns raised around parking.</li> </ul>	



Key issues raised	Response	Proposed amendments
<p><b>Petition 1</b> (30 signatures) from residents of <b>Rosen House</b> centred on development proposals in the area ID Ref (Wendy Ebrahim)</p> <ul style="list-style-type: none"> <li>• Consultation: Not undertaken to a reasonable / inclusive enough standard</li> <li>• Integrated Impact Assessment: Could not locate this document.</li> <li>• Proposed Local Plan: Too long / too much jargon / no link between old and new plan / confusing link to London Plan (2021) / sufficient options for development not provided</li> <li>• Opportunity Area / Tall Building Zones: Unclear on how OA was chosen for development / No clear analysis and justification for heights / Tall Buildings harm suburban areas adjacent to OA</li> <li>• Number &amp; Types of New Homes &amp; Affordable Housing: Need more family homes than 25% / More Social rent that shared ownership needed / distribution of homes across borough / request site allocations document.</li> <li>• Impact on Health &amp; Wellbeing: Building and traffic impacts / Air Pollution</li> <li>• Job Opportunities: where will these 1000 jobs be located?</li> <li>• Infrastructure and funding: primary / Secondary Care missing from plan / capacity at Northwick Park &amp; more GP's?</li> <li>• Traffic / Parking: Demand on car parking / Harrow on Hill bus station at capacity</li> </ul>	<p>These cover a range of issues that are addressed through individual chapters/parts of the Local Plan.</p>	<p>Changes considered through individual chapters/parts of the Local Plan.</p>

Key issues raised	Response	Proposed amendments
<ul style="list-style-type: none"> <li>• Crime / Anti-Social behaviour: Increase in population / tall building will increase crime/anti-social behaviour / local police services.</li> </ul>		
<p><b>Petition 2</b> (199 signatures) ID Ref (Irene Rusike) –</p> <ul style="list-style-type: none"> <li>• Consultation Not undertaken to a reasonable / inclusive enough standard. The council have not offered or considered any other options for development or asked views on these.</li> <li>• Targets- The council should stop at 5,000 in the Opportunity Area and redistribute the targets across the borough or challenge the GLA if the targets are not feasible.</li> <li>• Tall Buildings- Building heights proposed of 18 and 15 storeys to the Civic Centre and Tesco site are too high. The methodology used to identify locations where tall buildings can be sited is flawed.</li> <li>• Infrastructure- no firm numbers or ring-fenced funding provided on necessary infrastructure required</li> <li>• Jobs-unclear where the 1,000 jobs target will come from and who will provide or whether it applies just to the Opportunity Area</li> <li>• Suburbs- no protection has been given to the suburban areas adjacent to the opportunity area.</li> <li>• Types of development- more family housing is required to match demographics in borough</li> </ul>	<p>These cover a range of issues that are addressed through individual chapters/parts of the Local Plan</p>	<p>Changes considered through individual chapters/parts of the Local Plan.</p>

Key issues raised	Response	Proposed amendments
<ul style="list-style-type: none"> <li>Affordable Housing - experience from un-occupied developments shows built schemes shows shared ownership not affordable</li> <li>GLA Intensification to Opportunity Area- not clear how transition has occurred and benefits between the two</li> </ul>		
<p>Petition 3 (32 signatures) ID Ref (Mike Williams) – on behalf of <b>Proscenium Amateur Theatre Company</b></p> <ul style="list-style-type: none"> <li>No affordable performance space within the borough (having to go to Hillingdon)</li> <li>Flexible space that can accommodate 100-150 seats and be suitable for theatre, music and the visual arts</li> </ul>	<p>The Council will work with stakeholders to meet identified theatre space through its cultural and regeneration strategies, including through the Harrow Town Centre Masterplan. (Harriet- please check if this response is accurate based on any other response you have made.)</p>	<p>No specific changes required to the Local Plan.</p>
<p><b>Chapter 1- Borough Profile, Spatial Vision, Strategic Objectives</b></p>		
<p>The Borough profile contains no reference to Harrow’s key assets in relation to the historic environment and rivers/waterways.</p>	<p>Need for changes to address issue acknowledged.</p>	<p>Relevant Infographics to be added to Borough Profile.</p>
<p>Vision, Strategy Objectives and Spatial Strategy contain little or no reference to historic environment, blue/green infrastructure, meeting of housing and jobs targets including affordable and accessible housing and benefits of co-living.</p>	<p>Need for changes to address issues highlighted acknowledged.</p>	<p>Changes to Vision, Strategy Objectives and Spatial Strategy to acknowledge importance of relevant assets and their management, commitment to</p>

Key issues raised	Response	Proposed amendments
		addressing issues raised including the promotion of sustainable and cohesive communities.
<b>Chapter 2: High Quality Growth</b>		
A number of responses queried the emphasis of directing growth into the Harrow & Wealdstone Opportunity Area, rather than being spread across the borough.	Opportunities Areas are set out within the London Plan (2021) as areas that are sustainable locations that are capable of delivery of jobs and homes. By reason of this, such locations are sequentially more appropriate for new development than in other locations such as suburban locations that are less sustainable.	
Numerous representations have been received in relation to tall buildings. These relate to the definition of a tall building, and also where tall buildings should be located and what the appropriate heights of them would be in such locations.	Evidence base underpinning the new local plan considers the character of the entire borough and also where within the borough tall buildings could be appropriate. The relevant evidence base is clear that the Harrow & Wealdstone Opportunity Area is the most appropriate location within the borough for tall building development. Specifically, the Harrow & Wealdstone Opportunity Area tall building evidence base sets out differing locations that are capable of delivering tall buildings and what the appropriate heights	

Key issues raised	Response	Proposed amendments
	could be. The evidence base underpins the policies in relation to tall buildings and also character of the borough.	
Responses have been received that new development must be supported by necessary infrastructure such as Doctors and Schools etc.	The new local plan will be supported by an Infrastructure Delivery Plan to assist in identifying the necessary infrastructure across the borough / local plan period. New development will be required to contribute to necessary infrastructure either through site allocations or through the attraction of Community Infrastructure Levy (CIL) or through S.106 obligations (secured by Policy GR11 (Planning Obligations)).	No amendment required as policy and evidence base are in place to ensure necessary infrastructure is secured across the plan period and through specific planning applications.
<b>Chapter 3- Heritage (Historic Environment)</b>		
The majority of comments received were from a Statutory Consultee, Historic England, and predominantly focused on ensuring up-to-date terminology has been used. This is to ensure consistency with heritage legislation and guidance.	Consistency with terminology higher legislation and guidance should be achieved.	Amendments made across Chapter 3 to ensure consistency with heritage legislation and guidance, including title change from 'Heritage' to 'Historic Environment'.
Concern that the policy in relation to enabling development was contrary to the National Planning Policy Framework (NPPF) as it was perceived to be promoting harm to heritage assets.	Policy retained as it is considered to strengthen the Council's negotiating position with respect to works to heritage assets and within their setting where this is proposed as	None proposed. Waiting feeding from Historic England

Key issues raised	Response	Proposed amendments
	enabling development to secure the long-term future of the asset.	
<b>Chapter 4 Housing</b>		
<p><b>Proposed Housing requirement/target (Strategic Policy 03: Meeting Harrow's Housing Needs)</b></p> <p>Responses generally support the inclusion of a housing requirement of 16,040 homes over the Plan period (2021 -41)</p> <p>Developers raise the issue that the Local Plan housing target/requirement should be based on the standard method (. i.e. above 16k home +) to deliver more family sized and affordable housing to address needs.</p> <p>A petition raised the issue that the level of need/demand for additional homes is not justified by any demographic evidence.</p>	<p>National Policy clarifies the London Plan sets a London wide housing target based on a needs assessment and distributes this between Boroughs. The London Plan clarifies Borough (para 4.1.2) are not required undertake their own housing needs assessment and "Local Plans are not required to take account of nationally derived local-level need figures" (.i.e. standard methodology) (para 4.1.1).</p> <p>The Harrow Local Housing Needs Assessment (LHNA) 2024 informed Policy SP3. This assessed the level, type, size, tenure of housing that may be required to address local housing needs. This considered the potential implications of the GLA and ONS demographic data such as household/population projections, for future housing delivery.</p>	No amendments proposed
Representations raise the issue that it is unclear why the London Plan 10-year housing target (8020 homes) was doubled. There was a concern this will be undeliverable	The NPPF (para 22) requires Local Plans to cover a period of 15 years from the adoption date. It is good practice to produce a Plan covering more than 10 years, as a time lag	No amendments proposed

Key issues raised	Response	Proposed amendments
	<p>can arise in the delivery of large strategic sites and infrastructure (. e.g. gaining planning permission, market conditions, viability). Hence, the London Plan (2021) 10-year housing target was doubled, to ensure the Plan covers a minimum of 15/16 years from the expected adoption date (2025). The GLA have raised no general compliance issues with the London Plan in relation to this approach, which has been found sound in other Local Plan examinations.</p>	
<p><b>Small Sites windfall allowance/policy (Strategic Policy 03: Meeting Harrow’s Housing Needs, and HO3: Optimising the use of small housing sites)</b></p> <p>Concerns raised that the small site windfalls amounts to 25% of the housing requirement and is based on the 2017 London SHLAA, which is not considered up to date or robust. Further, the NPPF cautions against over reliance on windfalls and requires compelling evidence to justify this.</p>	<p>The London Plan (2021) indicates the small site target (375 dpa) can be considered as a reliable source of windfall housing sites and can contribute towards anticipated future supply to meet the Local Plan housing requirement, as well as provides compelling evidence in line with the para 72 of the NPPF (para 4.2.3).</p> <p>The Small Sites Capacity Study (2022) indicates circa 300 homes per annum (p.a) were delivered on small sites (below 0.25ha) between 2010-19. It indicates the potential small sites identified within this had a capacity to deliver between 380 - 478 homes per year over the Plan period. Compelling evidence exists to justify the inclusion of a small site’s</p>	<p>No amendments proposed</p>

Key issues raised	Response	Proposed amendments
	windfall allowance of 375 homes per year and demonstrates this will be a reliable source of supply.	
<p><b>Housing Supply (Strategic Policy 03: Meeting Harrow's Housing Needs)</b></p> <p>Concerned the Draft Plan indicates a shortfall in housing supply of 1278 against the housing requirement (16k). There is uncertainty in relation to whether this will be addressed, as the Plan is highly reliant on unimplemented allocations, pre-applications, and small sites windfalls to address needs.</p> <p>Developers indicates exceptional circumstances exist to release Green Belt Land to address the shortfall in housing supply to address needs, as well as increase the delivery of affordable and family sized housing.</p>	<p>In line with the NPPF and London Plan, the Local Plan spatial strategy prioritises the development of previously developed sites, within the most accessible and sustainable locations, to address housing needs.</p> <p>A call for sites was undertaken. Further assessment will determine which sites should be allocated and their capacity, to address local housing needs. In line with National Policy and London Plan policies, no exceptional circumstances have been demonstrated to justify the release of Green Belt land to address future housing needs. The proposed site allocations will be included in the updated Local Plan, at the next stage of the plan making process.</p>	No amendments proposed
<p><b>Locations of new housing (Strategic Policy 03: Meeting Harrow's Housing Needs)</b></p> <p>A high level of respondents raised the issue that the Local Plan fails to provide any details of the location where new housing will be delivered, to address future housing needs.</p>	The London Plan (2021) identifies Harrow Wealdstone Opportunity Area (. i.e. minimum of 5k homes and 1k jobs) as a significant location with development capacity to accommodate new housing, commercial development, and infrastructure (of all types),	No amendments proposed



Key issues raised	Response	Proposed amendments
	linked to existing or potential improvements in public transport connectivity and capacity.	
<p>A petition and other respondents have raised the issue that the opportunity area should not accommodate a significant proportion (. i.e.50%) of the Borough’s future housing needs. The proposed distribution of housing growth should be fairly spread across different parts of the Borough, including within highly accessible locations such as within/close to town centres and transport hubs</p>	<p>Policy SP3 sets out the broad locations where housing growth may be accommodated, based on existing unimplemented permissions and allocations (including small sites windfall sites). In line with the London Plan (2021), a high proportion of housing growth is proposed within the Opportunity Area (circa 7,500 homes). This is considered the most sustainable location for delivering high density developments, based on evidence. This ensures residents have good access to public transport, local services/facilities, employment opportunities; to encourage use sustainable modes of transport and deliver the supporting infrastructure.</p> <p>The distribution of housing growth is based on extant permissions and unimplemented site allocations. This may change depending on the locations of the proposed site allocations (&amp; permission), included in the updated Local Plan</p>	No amendments proposed
<p><b>Type and size of units delivered (Policy HO1: Dwelling Size Mix)</b></p>	<p>The LHNA (2024) indicates there is a high priority to increase the provision of family sized housing (3 bedroom/+) to; address the</p>	No amendments proposed

Key issues raised	Response	Proposed amendments
<p>Many representations raised the issue there is shortage of family sized housing and adequate measures are required to address this and deliver mixed and inclusive communities.</p> <p>Concerned there has been a past under delivery of housing that has encouraged the delivery of a higher proportion of smaller units, as well as resulted in a shortage of highly needed affordable and family sized housing.</p> <p>The London Plan includes specific emphasis on providing a unit mix breakdown for affordable housing and any specific mix for market housing should be clearly justified in line with the NPPF (para 35).</p> <p>The Plan seeks to ensure 25% of all housing is family sized across all tenures but fails to consider local specific characteristics. Greater level of flexibility is needed to determine an appropriate size mix, as previously developed sites require the optimisation of capacity to ensure viability.</p> <p>Repeated representations note “Demographic data indicates 32.5% of households are 4 or more people, which means more than 25% of homes should be family sized units. Flats in tall buildings are not suitable for families and more family and affordable homes</p>	<p>needs of existing and future households (i.e. families with children, multi generation families), reduce overcrowding, provide housing options that are affordable and suitable for younger families and lower income households.</p> <p>Policies SP3 set the overarching strategic targets to address local needs. Policy HO1 includes a detailed criteria for considering locally specific factors and requires developments to ensure a minimum of 25% of all new homes, or more on suitable sites are family sized, as well as includes flexibility to allow applicants to demonstrate why this cannot be achieved. The Plan also includes policies to increase the provision of family sized housing (HO1), protect the existing stock (HO2). The council does not agree flatted accommodation is unsuitable for families, as it is a more affordable option for some, and design requirements have overcome many of the challenges families had previously faced in these. Not all housing proposed would be in the form of flats.</p> <p>The policy approach seeks ensure an appropriate balance is achieved between the need to increase the provision of family</p>	

Key issues raised	Response	Proposed amendments
should be delivered, rather than what is most profitable for developers”.	housing and a competing set of factors, such as increasing the delivery of housing to address housing needs by optimising the output of sites; the need to consider the site size, constraints, location, area’s character and viability.	
<p><b>Conversion of larger dwellings (Policy HO2: Conversion and redevelopment of dwellings)</b>  Historic England suggest Policy HO2: Conversion of and redevelopment of larger dwellings includes a criteria to ensure proposals conserve, enhance the significance of heritage assets, and clarify that a heritage impact assessment (HIA) and Listed Building Consent (LBC) may be required.</p>	Agree the supporting text of policy HO2 could include references to the NPPF and Local Plan Policies SP2, HE1 in relation to the potential need for HIA and LBC. There is no need to repeat national policies/guidance and any regulations, as these will apply for considering proposals	Yes: Amendments have been proposed to the supporting text of Policy HO2
<p><b>Affordable housing (Policy HO4: Genuinely Affordable Housing)</b></p> <p>The definition included in policy SP3 is contrary to the NPPF and London Plan, as this indicates such products will be provided to low-income households. The NPPF definition includes discounted market sales housing and other routes to homeownership for households on a range of incomes.</p>	Agree: The text in relation to affordable housing policy is proposed to be revised, to ensure consistency with the NPPF/London Plan definition.	Yes: Amendments have been proposed to Policies SP3 and HO4 in relation to the definition of affordable housing
There is a lack of demand for shared ownership products as evidenced by the unsold units in new	Policy HO4 seeks to increase the delivery of affordable housing in new development, as well as prioritise the delivery social rented	No amendments proposed

Key issues raised	Response	Proposed amendments
schemes. Low cost rented affordable housing are required to address needs.	housing, to enable lower income groups access suitable housing. It also facilitates alternative 'intermediate' forms of affordable housing tenure, such as London Living Rent, as an alternative to Shared Ownership.	
The Plan fails to include any reference to First Homes, as intermediary affordable housing product. This is contrary to the Ministerial Statement.	The policy does not include any reference to First homes because (a) The Mayor of London is not seeking to progress First homes as a policy for the foreseeable future. (b) The price of new homes in Harrow, especially three bedrooms housing, after the First Homes discount of 30% would exceed the £420K cap included within the Government policy and other products such as London Living rent, social rented housing are more affordable (LHNA) (c) The policy requires 25% affordable homes to be First Homes, which is contrary to the tenure mix suggested by LHNA. (d) No developer has indicated an interest to deliver First Homes, but they can be bought forward as intermediary low-cost home ownership products, in line with NPPF (2023).	Yes: New text has been proposed to provide clarity on the First Homes.
TFL raise the issue that Policy HO4 Genuinely Affordable Housing should clarify a 50% affordable housing threshold applies on publicly owned land, unless there is a portfolio agreement with the Mayor	Agree with TFL amended text is proposed for Policy HO4 to clarify that a 50% affordable housing target applies to sites on publicly	Yes: amended text has been proposed to clarify this issue

Key issues raised	Response	Proposed amendments
and where is an agreement, individual sites should meet a threshold of 35 %.	owned land, unless a portfolio agreement exists with the Mayor	
The NHS raise suggest the Local housing needs assessment should consider the need for affordable housing for NHS Staff and other employed with health and care providers.	The LHNA assessed level of affordable housing that may be required to address the needs of key worker, as part of overall need. New text is proposed to clarify the role intermediate housing can play to address the housing needs of key workers who provide essential public services.	Yes: New text has been proposed to highlight the role intermediate housing can play to address the needs of essential key workers.
Brent Council queried if options for seeking affordable housing on schemes on minor developments (e.g. 5-9 units schemes have been explored via the Local Plan	In line with the NPPF (para 65), the Local Plan is seeking affordable housing contributions from major residential developments (. i.e. above 10 units).	No amendments proposed
Developers, TFL and the Housing Buildings Federation raise the issue Policy HO4 includes a Boroughwide target of 50% affordable housing. It is unclear if a minimum delivery of 35% affordable housing is needed to apply the fast-track route.	Agree: additional/amended text should be included to clarify that; proposals which include a minimum 35% affordable housing, meet other criteria of Policy H5 of the London Plan can apply fast-track route.	Yes: Revision required to ensure consistency with London Plan policy H5
The text included in Policy HO4 in relation to the vacant building credit (VBC) is confusing (. i.e. not appropriate in Borough) and contrary to National Policy that seeks to encourage the redevelopment of previously developed sites.	Part N of Policy HO4 is consistent with the NPPF and the Planning Practice guidance (i.e. Planning Obligations) in relation to the VBC. This provides guidance and sets out factors that will be considered to determine if the VBC should apply. Amendment is proposed in response to the issue noted.	Yes: delete text that indicates the Vacant building credit is not appropriate for Harrow

Key issues raised	Response	Proposed amendments
<p>Developers raised a concern that the proposed 70:30 tenure mix between low cost rented and intermediate housing may have implications for the viability of new development.</p>	<p>In line with London Plan Policy H6, Policy HO4 proposes a 70:30 tenure split between low cost rented and intermediate products, based on the LHNA. London Plan Policy H5: Threshold approach will apply to residential proposals and allows flexibility to determine an appropriate tenure mix for residential schemes based on viability and other factors, on a site-by-site basis.</p>	<p>No amendments proposed</p>
<p>Developers raises a concern that the provision of affordable housing in older person housing schemes may be unviable, compared to conventional C3 housing. Suggest the Local Plan viability assessment should assess such products separately and that more flexibility is required for smaller schemes (100 units), or they should be exempt for affordable housing provision.</p>	<p>In line with the NPPF (para 34, 35), the Council will undertake a Viability Assessment to assess the potential impact of the proposed Local Plan policies (including the affordable housing), either individually or cumulatively on the deliverability of potential residential development.</p>	<p>No amendments proposed</p>
<p><b>Build to rent (BTR) (Strategic Policy 03: Meeting Harrow’s Housing Needs)</b></p> <p>TFL and a promoter raised a concern that the policy seeks to direct BTR development within the Opportunity area, which is contrary to the London Plan that requires Local Plans to take a positive approach to such schemes, to increase housing supply to address local needs.</p>	<p>Policy SP03 was seeking to direct BTR developments within the Opportunity Area (OA, which was considered the most sustainable, suitable location for such schemes. It was seeking to ensure residents of BTR schemes that can be high density, have easy access to local services and facilities, public transport, and employment opportunities, to reduce car use and the need</p>	<p>Yes: Amendments have proposed to provide further clarification on the appropriate locations for BTR schemes</p>

Key issues raised	Response	Proposed amendments
<p>Restricting BTR within the Opportunity Area is unjustified, as it excludes other highly accessible locations (. i.e. PTAL 4 or more) of the Borough for BTR developments, which may adversely impact investment and regeneration.</p>	<p>for street car parking. It recognised a significant quantity of units would need to be delivered within BTR schemes, at a sufficient scale to benefit from economies of scale, to fund the cost of maintaining/managing it and be viable; whilst balancing this with the need to protect the Borough character that is predominately 2-3 storeys in suburban locations and 3-4 storeys within town centres and transport hubs. Hence, it noted BTR development may need to be built at a significant scale and at 4 or more storeys on smaller sized sites and may be unsuitable for parts of Borough outside of the OA (i.e. suburban locations).</p> <p>A proposed amendment acknowledges BTR developments can boost housing supply and there may be other highly accessible parts of the Borough where such schemes may be acceptable such as District, Major Town Centres that generally have good accessibility (.i.e. PTAL of 4/+), providing the site is of a sufficient size to accommodate a significant level of units, to ensure the viability and protect, enhance the area’s character.</p>	
<p><b>Policy H05: Estate regeneration</b> – concerned this may result in the net loss of open space to deliver</p>	<p>Agree: The supporting text of policy HO5 could include reference importance of open space for climate resilience and biodiversity</p>	<p>Yes: Amendments have been proposed</p>

Key issues raised	Response	Proposed amendments
<p>more housing. This should clarify the important for climate resilience, biodiversity.</p>		
<p><b>Older person accommodation (Policy HO6: Accommodation for older people)</b></p> <p>The overarching strategy to address the needs of older people seeks to prioritise the delivery of conventional self-contained housing (C3) designed to be adaptable to the changing needs of users throughout their lives. This fails to recognise housing for older people has its own requirements that cannot be addressed via conventional housing designed to be accessible and adaptable.</p>	<p>The London Plan (para 4.13.1 -4.13.2) and NPPF (e.g. definition of older people) recognises that not all older people will require specialised older people housing to address their needs and the importance of ensuring new housing is built to accessible, adaptable standards to ensure the occupants can remain within their existing accommodation, as their health and mobility changes throughout their lives.</p>	<p>No amendments proposed</p>
<p>Developers and House builders' federations raise a concern that a target has been included to deliver 980 older person accommodation units over 10 years (2022-32) based on a LIN Study. This underestimates need (. i.e. below the London Plan target of 165 units per annum) and does not cover plan period (. 15 years) and result in a shortfall of 1k units. The methodology used by LIN is flawed because it projects forward prevalence rates of existing older person housing, with an uplift for the England rate, without considering any shortfall/critical need that may occur. It assumes 50% of the need can be met via mainstream housing designed for and accessible for older people.</p>	<p>In line with the NPPF (para 63) and London Plan Policy H13, a target to delivery 980 specialised older person accommodation between 2022-32 is included based on a local needs assessment (. i.e. LIN study), which is below the 165 units per annum benchmark figure (2017-29) included in the London Plan. The supporting text of Policy H13 notes the benchmark figures are designed to inform a local level assessment and this does not take account of a lower older people population growth after 2029. The LIN study is considered a robust assessment of need, based on modelling, good practices and</p>	<p>No amendments proposed</p>



Key issues raised	Response	Proposed amendments
	<p>research by experts. A minor amendment clarifies the supply of new older person accommodation will be monitored against needs and updated evidence may be undertaken (if necessary).</p>	
<p>The NHS recommend the following changes to Policy HO6 Accommodation for older people: (1) criterion should require a higher need of wheelchair accessible dwellings in development targeted at older demographics, such as age restricted 'retirement villages'. (2) The requirement for 100% accessible rooms in care home setting should be broadened to include reference to multipurpose space for visiting professionals, both health and otherwise (. i.e. clause g). (3) Clause F should include reference to sensory gardens, particularly for care homes and those suffering from dementia</p>	<p>The LHNA indicates the Borough is expected to experience an ageing population during the Plan period. This is likely to increase the proportion of population that are likely to suffer some form of physical disability, particularly those aged 65 +.</p> <p>The PPG indicates Councils can set higher standards for the level of homes that should be built to wheelchair use accessible standards (. M4(3), to ensure an adequate supply is delivered to address local needs, based on local evidence. The Housing LIN (2022) assessed the housing needs of older people and adults with care/support needs. This indicates 390 wheelchair accessible dwellings are likely to be required by 2032, to address the unmet needs of adults aged 65+. Amendments are proposed to (1) clarify a higher level of wheelchair accessible dwellings will be required for specialist older person accommodation schemes that are aimed at the older population (65+) (2) to</p>	<p>Yes: Amendments have proposed in line with the NHS recommendations</p>

Key issues raised	Response	Proposed amendments
	include reference to the need for sensory gardens and (3) clarify that the requirement for 100% wheelchair accessible rooms should apply to multi-purpose spaces use for visiting professional.	
Hertsmeire Council and developers raise the issue that the policy HO6 should clarify which types of older person accommodation are required to provide affordable housing.	The Supporting text of policy HO6 notes there are a range of older people accommodation products, and the market is evolving. In line with London Plan, NPPF, the affordable housing policy will apply to self-contained C3 units, but it may apply to C2 proposals that include self-contained units with a higher level of care. The issue of whether a proposal falls within C2/C3 use on a case-by-case basis, & consider London Plan Policy H13.	No amendments proposed
A developer raised an issue policy HO6 supports older person accommodation in areas with a PTAL rating of 3 – 6, even though large parts of the Borough have a lower rating. Suggests proposals should be supported in locations that are within/edge of town and Neighbourhood centres.	The areas of the Borough that fall within PTAL 3-6 are all located within proximity to the existing town centres or train/tube stations and cover the boundaries of the larger centres. In line with the London Plan (H13), this policy ensures older people have good access to local facilities, services (. i.e. health) within town centres, public transport & remain independent and socially connected.	No amendments proposed

Key issues raised	Response	Proposed amendments
<p><b>Large scale purpose built shared living (LSPBSL) (Policy HO9: Large scale purpose built and conversions for shared living)</b></p> <p>Developers have raised the following issues in relation to the Policy HO9: LSPBSL and conversions:</p> <p>1. Unclear why proposals should be required to demonstrate a need for LSPBSL, as there is significant demand for these across London as evidenced by completed schemes. They contribute to affordable housing; help release of family sized housing and are restricted to locations within the Harrow Metropolitan and Wealdstone District Town Centres that are unsuitable locations for low density family housing. The LHNA indicates there is lack of demand for LSPBSL due to the limited rise in the younger sharing households, but the target market is 25-34 age group who trend to be single and prefer accommodation with community and social interactions. Further, LSPBSL schemes can address the term needs of those on short term contracts and those not looking for permanent accommodation. The requirement to demonstrate need is contrary to the London Plan and should be deleted.</p>	<p>(1) The LHNA did not identify any specific requirements to provide LSPBSL to address any local needs, as the younger population (aged 25-44), single households, student population are not projected to increase, and the area lacks a significant student population. It indicates there is a high priority to increase the delivery of family sized housing and lack of requirement to deliver smaller sized units to address the future housing needs.</p> <p>In line with the NPPF (Para 60, 63), Criteria Aa of Policy HO9 seeks to ensure a sufficient amount and variety of land comes forward to address the housing needs of groups with specific requirements in terms of size, tenure and type of housing. The key housing requirement for the Borough is self-contained housing, particularly family sized (or 2b 4p units) and affordable housing. The criteria ensures there is not over supply/over concentration of LSPBSL, if the market conditions change; as well as ensure the delivery of self-contained housing is not compromised; to address local needs.</p>	<p>No amendments proposed</p>
<p>2. The policy seeks to direct LSPBSHL to the town centres within the Opportunity area, which is contrary to the London Plan that seeks to support such</p>	<p>(2) In compliance with the London Plan Policy T6 and Guidance, Policy GR4: Building Heights, the Local Plan was proposing to</p>	<p>(2) Yes: An amendment has been proposed to make it</p>

Key issues raised	Response	Proposed amendments
<p>schemes within accessible locations. Suggest LSPBSL should be permitted locations such as major town centres and highly accessible locations with a PTAL of 5-6 (or 3-6). Potential height and other issues associated with LSPBSL can be addressed via other policies.</p>	<p>direct LSPBSL that are car free developments within the highly accessible parts (. i.e. PTAL 5-6) the Harrow Metropolitan and Wealdstone District Major Town Centres, which fall within the Opportunity area. In line with the London Plan (2021), the Opportunity Area proposed to accommodate a significant level of the Borough’s housing and employment needs. This is considered the most suitable location for accommodating LSPBSL schemes of 50 or more units, their supporting communal areas and living spaces. Research indicates LSPBSL schemes need to deliver a significant number of units and at a sufficient scale to benefit from economies of scale, to fund the cost of providing/servicing the communal areas and managing/maintaining it, to ensure viability. This means LSPBSL schemes would need to be built at a high density of 4 storeys (or more) on small sites. In contrast, the Harrow characterisation, and Tall Building Study (2024) indicates the character of Borough outside of the Opportunity Area has a predominately suburban character of generally two storey buildings, and three-four storeys near/within some of the town centres and proximity to transport hubs. Therefore, it is considered that locations outside of the Opportunity Area (.i.e. Suburban areas) are</p>	<p>clear that LSPBSL will be directed to locations within the opportunity area</p>

Key issues raised	Response	Proposed amendments
	<p>unlikely to viable and suitable for LSPBSL schemes, as the site are likely to be smaller and unlikely to be developed at a sufficient scale to benefit from economies of scale, without adversely impacting the Borough character.</p> <p>A proposed amendment clarifies LSPBSL may be acceptable within the Opportunity Area boundary.</p>	
<p>3. Concerned the distance test to assess overconcentration of LSPBSL is arbitrary, too prescriptive, onerous, unjustified and may will result in the under delivery of LSPBSL. Key reasons are criteria a-c of the policy already address the issue of over concentration (. i.e. need, location) and town centres are not suitable locations for family sized units.</p>	<p>(3) The 250m distance test is consistent with the NPPF (Para 60, 63), which requires Plans to ensure a sufficient amount and variety of land comes forward to address the housing needs of groups with specific requirements in terms of size, tenure and type of housing. It is compliant with the London Plan (H16) and the planning guidance that seek to ensure there is not an over concentration of LSPBSL within a given location, which can adversely impact the delivery of conventional C3 housing and the ability to address a range of priority housing needs (. i.e. family and affordable housing) and achieve mixed and inclusive communities. Criteria D includes an element of flexibility as it allows applicants to demonstrate that appropriate alternative uses would not be unsuitable and viable. A minor amendment is proposed to the text of criteria</p>	<p>(3) A minor amendment is proposed</p>

Key issues raised	Response	Proposed amendments
	D to make it less prescriptive in relation to assessing if a site may be appropriate for alternative uses. This will be determined on a site-by-site basis.	
The criteria to assess the affordability of LSPBSL products against other private rental products needs to take account of the higher quality of this product and includes all costs.	The Council is aware the rent of LSPBSL products can be include all costs and facilities. Whilst the rent of a room in shared house can include all costs, but the quality of two products may differs. This requirement is intended to understand the comparative role LSPBSL can play with respect to housings options / costs.	No amendments proposed
Proposals should not be required to demonstrate a flexible design/layout can allow LSPBSL to be converted/retrofitted to residential, hotel or other town centre uses. It may not always be possible to convert to a residential use due to different servicing, fire management strategies.	The requirement to demonstrate a flexible design/ layout for LSPBSL, to allow the easily conversion/ retrofit of it into a C1 hotel or a residential use, is in line with the London Plan, which seeks to promote a circular economy to reduce waste, carbon footprint and climate change.	No amendments proposed
Delivering active frontage in town centre development and doesn't exclusively apply to LSPBSL schemes. Concerned the requirements for flexible workspace, public amenities are too prescriptive and may be applied arbitrary. Suggests the need for these should be considered on a site-by-site basis, whilst considering site constraints.	The need to deliver flexible workspace and publicly accessible amenities, are important for achieving local plan objectives (. i.e. inclusive communities, vitality/viability of centres, employment generation) and ensure LSPBSL are promoting the sustainable development. They also provide a satisfactory	A minor amendment is proposed.

Key issues raised	Response	Proposed amendments
	<p>environment for residents who increasingly work remotely/flexibly and require more space than the smaller private living area, as well as support modern employment arrangements. Flexible workspace is an important aspect for the successful functioning of LSPBSL developments. A proposed amendment to part G of the policy, clarifies public amenities should be provided in suitable locations.</p>	
<p><b>HMO's (Policy HO10: Housing with share facilities (Houses in Multiple Occupation))</b></p> <p>TFL suggests Policy HO10: Housing with shared facilities should clarify HMO's proposals for 6/+ people are classed as sui generis and should be car free and be located within well connected areas, in line with London Plan Policy T6.</p>	<p>The London Plan (2021) is part of the development Plan for area and its policies will be used to determine planning applications. Criteria 11 of Policy HO10 includes reference to Policy M2, which indicates car parking spaces should comply with the maximum standards included in the London Plan. There is no need to repeat London Plan policies.</p>	<p>No amendments proposed</p>
<p>An objector has suggested wording for a stricter policy should be included to limit HMO developments, particularly on streets characterised by family housing</p>	<p>The proposed HMO policy seeks to strike a balance between the positive aspects of them and the important role it plays in providing affordable accommodation for people and mitigate the negative aspects. The proposed wording sought is far too restrictive and ignores the very real need for this type of accommodation. The proposed changes to policy wording go too far and should not be adopted.</p>	<p>No amendments proposed</p>

Key issues raised	Response	Proposed amendments
<p><b>Self-Build and Custom build housing (PolicyHO11: Self-build and Custom build housing)</b></p> <p>Members of a co-housing group indicate Policy SP3F and HO11 are unsound as they conflate community led housing (CLH) with self-build and custom build housing. Suggest inclusion of a separate section in policy SP3 for CLH and specific references in other policies (. i.e. HO3); to support the delivery of community-led housing projects such as Co housing schemes. Further it is suggested large strategic sites should be required set aside 5% of the site to be sold to self and custom build housing developers, subject to demand.</p>	<p>Policy HO11 makes it clear that CLH can forward via self-build and custom build housing or other deliver models. This is considered sufficient for considering proposals for co-housing schemes or CLH schemes.</p> <p>The Council do not consider it appropriate to include a policy that requires strategic sites to set aside 5% of housing plots for self and custom build housing due to (1) The self-build register indicates a limited level of demand for such plots, possibly due to the scarcity of land, high cost of land and issues with acquiring funding from banks. Such sites have not been submitted via the Local Plan process (2) Site that will come forward for development during the life of the Local Plan are likely to comprise of previously developed land within the opportunity area, within/edge of town centres and transport hubs. This means they are likely to require high density development (e.g. flats) to ensure viability and deliver sufficient housing to meet the Borough housing targets &amp; are unlikely to be suitable for self/custom build housing.</p>	<p>No amendments proposed</p>



Key issues raised	Response	Proposed amendments
<p>The co-housing group suggest that a policy should be included for small scale purpose built and conversion shared living, as co-housing schemes may not be self-contained and may include shared communal area</p>	<p>A minor amendment to Policy HO9, clarifies shared living schemes below 50 units will be assessed against policy HO10:</p>	<p>Yes: Minor amendments</p>
<p><b>Gypsy and Traveller Accommodation needs</b></p> <p>The GLA indicate the Plan should include suitable site allocations to address any additional pitch needs, based upon the latest London Gypsy and Traveller accommodation needs Assessment (GTANA). Hertsmere Council further add that the GTANA should be based on the updated Gypsy and Traveller (G &amp; T) definition and sites should be dispersed across a wider area, taking account of any sites within proximity within Hertfordshire.</p>	<p>Policy HO12: G &amp; T accommodations needs, and its supporting text will be updated based on the pitches need identified by the final GLA London Gypsy and Traveller Accommodation Needs Assessment (GTANA). The Council is proposing to accommodate any additional G &amp; T pitch need identified by the GTANA within the existing site allocation at Watlings Farm will include provisions for up to 12 additional pitches within this site. Further details in relation to the capacity, boundaries and consideration will be included within the updated Local Plan consultation document (reg 19) at the next stage of the process.</p>	<p>Yes: Amendments have been proposed to the G &amp; T policy and its supporting text</p>
<p><b>Health Impact Assessment</b></p> <p>NHS suggest the Plan should require a health impact assessment for significant residential developments (. e.g. 100 units), to ensure local health outcomes can be considered at the outset of proposals and measures are taken to address them.</p>	<p>In line with London Plan Policy. Considered best dealt with by way of Local Validation requirements.</p>	<p>No amendment proposed</p>

Key issues raised	Response	Proposed amendments
<b>Chapter 5: Local Economy</b>		
A number of responses have queried how the 1000 jobs set out in the policy would be achieved across the borough.	The 1000 jobs set out in the Regulation 18 is derived from the London Plan (2021) which sets out indicative capacity for new homes and jobs within Opportunity areas across London. For the Harrow & Wealdstone Opportunity Area, the London Plan (Table 2.1) sets out an indicative capacity of 5000 homes and 1000 jobs.	Further clarity has been provided within the supporting text to set out where and how new jobs may be supported, especially where outside of the Harrow & Wealdstone Opportunity Area in other centres and clustered around large employer institutions.
Representations have been raised in relation to the industrial policies which seek to restrict some uses that are considered appropriate within the relevant policies within the London Plan (2021).	The industrial local plan policies are based on evidence base and ensuring a sufficient supply of industrial floorspace and premises within borough. Given the geographically small industrial land within Harrow, the remaining floorspace/premises must ensure the uses that are not appropriate on other locations (suburbia/town centres etc).	No change is considered necessary as the local plan policies are responding to evidence base and would remain in general conformity with the London Plan (2021).
Numerous responses were received in relation to the current state of the town centres and high streets and how the new local plan will address such concerns.	The draft local plan is based on up-to-date evidence base Nationally, Regionally and Locally which seek to set out the need and demand of employment floorspace. This also	No change is considered necessary as the local plan

Key issues raised	Response	Proposed amendments
	includes understanding the current state of employment floorspace and impacts from such matters such as Coronavirus.	policies are responding to evidence base.
A number of responses received sought to seek to protect or provide for cultural and arts floorspace within the borough given the importance it can play in people's lives	Draft Local Plan policies seek to protect existing cultural and arts floorspace, and encourage new floorspace where appropriate.	No amendment required.
<b>Chapter 6: Community Infrastructure</b>		
Several responses from the public asked why there was no explicit mention of which infrastructure aspects were well provided for, or which required improvement in the Local Plan.	These details and analysis of all infrastructure aspects are provided in the Infrastructure Delivery Plan scoping report and full version. This policy is based on the information in the IDP and evidence base.	No amendment required
Some representations from the public expressed concern that development in the borough would place additional strain on existing infrastructure	Consultation with infrastructure providers has enabled an understanding of need across the plan period. physical or financial contributions will be sought on a scheme-by-scheme basis through either S.106 agreements or Community Infrastructure Levy payments.	No amendment required
Some representations from statutory consultees requested direct references to their guidance in the policies.	Relevant guidance should be signposted to so that applicants can be easily directed to industry best practice.	Changes were made to the plan to reference guidance from consultees where relevant.

Key issues raised	Response	Proposed amendments
Some representations highlighted that there was a lack of burial space for their faith group.	The council has undertaken a needs assessment for burial space. Additional work is being undertaken to locate appropriate sites for expansion.	Amendments made to text to reflect this.
<b>Chapter 7- Green Infrastructure</b>		
Several responses from the public asked why there was no explicit mention of which infrastructure aspects were well provided for, or which required improvement in the Local Plan.	These details and analysis of all infrastructure aspects are provided in the Infrastructure Delivery Plan scoping report and full version. This policy is based on the information in the IDP and evidence base.	No amendment required
Some representations related to the Royal National Orthopaedic Hospital (RNOH) and its potential expansion as part of the green belt.	The Green Belt is a sensitive area for development and any redevelopment of the RNOH must be undertaken in collaboration with the council through the masterplanning process.	Change made to highlight the role of masterplanning in the redevelopment of the RNOH.
Many representations expressed support for increased protections for green spaces and greenery in the local plan. There is a general sentiment in favour of these policies.	Some representations from the public and statutory consultees requested that additional protections be introduced.	Some additional protections for greenspace, biodiversity, etc were introduced where appropriate.

Key issues raised	Response	Proposed amendments
Some representations from statutory consultees requested direct references to their guidance in the policies.	Relevant guidance should be signposted to so that applicants can be easily directed to industry best practice.	Changes were made to the plan to reference guidance from consultees where relevant.
<b>Chapter 8- Responding to Climate and Nature Emergency</b>		
Many representations expressed support for enhancement of climate and nature protections.	The general sentiment highlighted that climate change was a significant concern and additional effort must be made to ensure resilience to climate change risks and increased natural capital. Some representations from the public and statutory consultees requested that additional protections be introduced.	Some alterations to policies were made and additional protections introduced.
Some representations from developers were concerned that the new standards for net zero buildings would make development non-viable.	The policies have been through a viability assessment which indicated that these standards only introduce a small additional cost to developers which is necessary to ensure the buildings are net zero in occupation.	No changes were made.
Some representations were concerned that water efficiency in buildings was not adequately enforced by the existing policies.	Water efficiency is part of a building's overall sustainability and is a significant consideration. Water usage should be minimised and made more efficient in all new	Several changes were made to require higher levels of water efficiency in buildings.

Key issues raised	Response	Proposed amendments
	buildings in line with the latest industry standards.	
Some representations from statutory consultees requested direct references to their guidance in the policies.	Relevant guidance should be signposted to so that applicants can be easily directed to industry best practice.	Changes were made to the plan to reference guidance from consultees where relevant.
<b>Chapter 9- Managing Waste and Supporting the Circular Economy</b>		
Several responses highlighted support for enhanced circular economy policies.	The circular economy plays an important part in reducing embodied carbon from the construction industry. The council encourages reuse of materials wherever possible.	No changes required.
Several responses highlighted the issue of litter in the borough.	This is an ongoing issue for the council, particularly with regard to fly tipping and litter in the public realm. Interventions are introduced where practical.	No change required.
Some responses highlighted that council refuse sites were difficult to access or had inadequate capacity.	The council recycling depot is currently planned for works which would optimise the efficiency of the site. Additional evidence base work is being undertaken in collaboration with the West London Waste Authority to release a new waste plan.	No change required.

Key issues raised	Response	Proposed amendments
<b>Chapter 10: Transport and Movement</b>		
Several responses from the public asked why there was no explicit mention of which infrastructure aspects were well provided for, or which required improvement in the Local Plan.	Some high-profile strategic transport projects have been highlighted and added to the policy. Other infrastructure aspects have been discussed in the Infrastructure Delivery Plan (IDP) which is accompanied by a list of infrastructure projects (infrastructure schedule).	
Some responses requested more detail surrounding proposed strategic transport improvements.	Most of this detail is outlined in the Council's Transport Strategy and the TfL Healthy Streets pack. There are additional transport projects outlined in the IDP.	Some additional projects have been listed in the policy, however the majority of strategic upgrades will be identified in strategic documents.
Some representations took issue with the proposed parking provision.	Parking standards are outlined in the London Plan and set by the GLA/TfL there is no evidence to suggest that higher parking standards are required in the borough as that would not encourage modal shift.	No change proposed.
Many representations from the public expressed concern that traffic in the borough was getting worse.	The policies in the local plan aim to achieve a modal shift away from car use. Modal shift aims to allow more people to realistically and easily use other forms of transport i.e cycling, walking, public transport and result in less	No change proposed.

Key issues raised	Response	Proposed amendments
	reliance on cars. Infrastructure is required to facilitate modal shift which is detailed in the IDP and other strategic documents.	
Some representations from statutory consultees requested direct references to their guidance in the policies.	Relevant guidance should be signposted to so that applicants can be easily directed to industry best practice.	Changes were made to the plan to reference guidance from consultees where relevant.
<b>Appendices</b>		