Planning Policy
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Date: 2 March 2018

Sadiq Khan, Mayor of London
New London Plan
GLA City Hall
London Plan Team
Post Point 18
The Queen's Walk
London
SE1 2AA

By email: LondonPlan@london.gov.uk

Dear Mr Khan,

New London Plan – representations from London Borough of Harrow

Harrow Council welcomes the opportunity to comment on the draft new London Plan.

The Council acknowledges the significant challenge facing London with respect to accommodating a growing population, addressing housing affordability and ensuring a balanced and sustainable global city with respect to its diverse population, vibrant economy and natural and historic environment.

Such a challenge requires positive and proactive responses. Harrow has embarked upon a significant regeneration programme that is set to deliver approximately 5,000 new homes and 1,000 new jobs in the Harrow and Wealdstone Opportunity Area, with approximately half of these homes on Council-led sites. We also have a programme of estate regeneration and small-site development on Council housing land.

Harrow has a strong track record of delivering on the housing targets set for the borough in the London Plan. In the past eight years our housing completions have exceeded our cumulative London Plan target by almost 40%. Looking ahead, we have facilitated significant uplifts in anticipated housing yields on strategic sites within the Harrow and Wealdstone Opportunity Area, in some instances more than doubling the housing numbers anticipated in the adopted Area Action Plan (prepared jointly with the GLA).

The above successes have been driven by an evidence based approach to plan making and the pragmatic assessment and decision making on individual development proposals, in the context of a positive, collaborative working relationship with the GLA, developers and stakeholders.

The draft new London Plan is predicated on the concept of 'good growth' and this principle and the overarching good growth policies are generally welcomed. Whilst it is accepted the new London Plan needs to be bold and ambitious to meet the challenges facing the City and delivering 'good growth', Harrow has a number of concerns relating to the basis of some of the policies and whether they are justified by evidence and can be realistically be delivered. These concerns, along with the many aspects of the draft Plan Harrow supports, are set out in detail in the Table of Representations attached to this letter. The key areas of concern are however outlined below:

Housing

The draft Plan identifies housing need in London as 66,000 homes per year, based on the GLA prepared Strategic Housing Market Assessment (SHMA). Based on work commissioned by the West London Alliance (WLA), the Council considers that the average household size predicted in the London SHMA and draft London Plan is potentially too low, and does not adequately reflect changing patterns of living and evolving definitions of what a household is. This under-estimation of average household size means that housing targets set in the Plan are potentially higher than needed and of the wrong sort (size) required by London's current and future population the London SHMA. New projections prepared by the ONS (rather than CLG) due to be released later in 2018 may provide a better reflection of household sizes.

The draft Plan proposes a significantly different approach to housing, with a much greater reliance on windfall / small sites, particularly in Outer London. The proposed housing target for Harrow is 13,920 homes (1,392 homes per annum), which represents a 135% increase over our current target of 5,930 homes (593 homes per year). The Council is concerned about the scale and deliverability of this increase which is significantly greater than the 55% increase across all of London.

Our concerns are three-fold and relate to the proposed reliance on windfall / small sites, which the draft Plan indicates will contribute 965 dwellings per year out of the overall target for the borough of 1,392 homes per year (i.e. 69% of our overall target, compared to 38% of the overall London-wide target).

Firstly, the Council has significant concerns about the methodology used to identify the housing capacity of small sites, noting that this methodology and approach to small sites were not discussed with boroughs prior to the draft targets being set. The Council considers the methodology is not robust, in that it uses a 'proxy' for potential housing yield from small sites rather than a detailed assessment of the potential capacity from the three potential types of small sites capacity identified in Policy H2 Small Sites of the draft Plan. The small sites targets set in the draft Plan are therefore not considered to be based on robust evidence and are most likely to be an overestimation of capacity. Such a reliance on uncertain, unidentified windfall / small sites is itself is considered contrary to the National Planning Policy Framework.

Secondly, the Council considers the small sites targets are undeliverable. Harrow currently averages around 125 homes per year from small sites in a relatively supportive policy environment. The proposed small sites target of 965 homes per year therefore represents an 8-fold increase from such sites. The proposed small sites policy and its presumption in favour of housing development on sites are unlikely to achieve such a significant increase in delivery of housing on small sites. The draft Policy is not supported by any evidence that indicates why such sites have not been coming forward at the level anticipated by the GLA and how the draft Policy will address these reasons.

Thirdly, the Council has concerns about the fragmented and dispersed nature of sites coming forward through the small sites policy and the implications of this for infrastructure planning (for example, see transport below) and the Mayor's desire for 'good growth'. Such sites are also constrained with respect to how they can deal with other policy requirements such as flood risk / urban greening.

Industry / Economy

The Council supports the draft Plan proposals to retain industrial floor space within London / Harrow; this is supported by the Council's own evidence. The Council however has concerns about the practicalities and feasibility of seeking to achieve housing on industrial land by intensifying the use of industrial land in order to free some of it up for housing. These concerns are two-fold – namely the practicality of co-locating residential and industrial uses. In many instances, such an approach will result in relatively benign industrial uses (i.e. storage) being delivered in order to address reverse amenity impacts of introducing residential to the area. Residential development will most likely preclude B2 General industrial.

Secondly from a Harrow perspective, much of our industrial land is on small estates with relatively poor access to the strategic transport network, reducing the likelihood of industrial intensification being attractive to developers and able to be achieved to an acceptable design standard. There are also general concerns about the financial feasibility of new build industrial development within the borough, as our rental levels are relatively low as our sites do not meet contemporary needs (size, quality, format of provision and access to strategic transport networks).

Harrow supports the Mayor's encouragement for Article 4 Directions to remove permitted development rights from office to residential, to allow greater control over the Borough's employment floor space. The draft London Plan has acknowledged Harrow (along with many other outer London Boroughs) has lost a significant amount of economic floor space though the Prior Approval Process.

Transport

Harrow welcomes many of the aspirations relating to modal shift, but has concerns about the feasibility of achieving these in Outer London. The Mayor seeks to increase sustainable transport trips (i.e. walking, cycling and public transport) from 65% to 80% by 2041. The figure for Harrow is currently around 48%, which is the 7th lowest figure in London. Without significant investment in walking, cycling and public transport infrastructure, the Mayor's proposed modal share will not be achieved. None of the significant planned transport infrastructure improvements will benefit Harrow, nor significantly address orbital connections within the borough and adjoining boroughs.

Additionally, the small sites policy promotes infill development on vacant or underused sites and the redevelopment or upward extension of flats and non-residential buildings to provide additional housing without regard to public transport accessibility or proximity to tube or rail stations or town centres. Given such development is anticipated by the Mayor to represent a significant proportion of Harrow's housing capacity (up to 69%), this new development will potentially be occurring in areas with limited access to sustainable transport options and with no planned investment from the Mayor. Such concerns would also apply to other infrastructure planning such as schools and health.

Harrow welcomes the draft Plan setting differential rates for maximum car parking in Inner and Outer London in recognition of the different circumstances in these areas with respect to car ownership and access to sustainable transport options. The Council however considers that the Mayor needs to go further and allow boroughs greater discretion to set car parking rates within their Local Plans, where this can be justified by local evidence.

Harrow also has concerns regarding the increased cycle parking requirements in Opportunity Areas such as Harrow and Wealdstone. Whilst we are supportive of modal shift to more sustainable forms of transport, additional cycle parking requirements is likely to result in overprovision of cycle parking at the expense of other planning objectives, such as housing and amenity space. Harrow's trips by cycling is unfortunately one of London's lowest (at around 1% of trips) yet the same standards will apply as in areas with much higher cycle usage. Whilst the principle of future proofing for when cycle trips represent a greater proportion of overall trips is acknowledged, this should not result in the unnecessary loss of housing / amenity space etc in the short-term.

As noted above, Harrow fully recognises the need to facilitate good growth within London, particularly housing. The Council has been proactive in this regard and has a strong track record of delivery. Our concerns outlined above (and in more detail in the attachment) relate to the appropriateness of the housing targets set in the London Plan and their deliverability. The Council considers that little is to be gained from setting housing targets that cannot be met. We would welcome opportunity to work with the Mayor to identify realistic housing targets for the borough and to address the more detailed issues raised in the attached.

If you would like to discuss any of the Council's representations in more detail, please contact David Hughes, Planning Policy Manager, on 020 8736 6082 or david.hughes@harrow.gov.uk, who will be happy to discuss.

Kind regards,

Paul Walker
Corporate Director - Community

Attachment 1: Detailed representations on draft new London Plan

Attachment 1: Draft London Plan (2017) – Table of Representations: London Borough of Harrow

Introduction

Harrow welcomes the Mayor's commitment to Good Growth, recognising that development should not be at any cost. The Council has a number of concerns however about whether the draft London Plan strikes an appropriate balance between various aspects and objectives relating to development and 'good growth'. The Council also supports the draft Plan's ambition to address key issues within the City, including housing affordability. We however also have a number concerns about the deliverability of several aspects of the Plan and the potential negative impacts of some of the policies. The desire to provide 'concrete plans for action' is laudable, but in some areas these are still lacking and in other instances, the Plan arguably strays into matters that are not of a strategic scale and reduces the scope for boroughs' Local Plans to provide a local response to these. The recognition that significant investment is required to deliver the plan is noted and the Council supports the Mayor's desire to secure more funding and investment powers from Government.

Representations

Chapter 0	Introducing the Plan
London Plan Policy:	Representations
Paragraph 0.0.21	The draft Plan aims to implement policies as soon as possible, without requiring the update of local development plan documents (i.e. Local Plans). The Council considers that this desire for expediency may potentially mean the loss of the ability to set policies at a local level, with paragraph 0.0.22 suggesting the Local Plan responses will be limited to area-based frameworks, action plans and Supplementary Planning Documents, site allocations, brownfield registers and design codes. Such an approach risks the perception within communities that development is being 'done to them' rather than Local Plans representing a means by which they can proactively seek to influence development at a local level.

Additionally, such an approach risks instances where subsequent versions of the London Plan decide not to address an issue in the current draft London Plan and where Local Plans adopted after the current draft Plan did not address this issue, resulting in a gap in policies. |

Chapter 1	
London Plan Policy:	**Planning London's Future (Good Growth Policies)**
	Representations
General	Whilst many of the policies are laudable, it is difficult to understand how they would be applied in practice i.e. the preparation of Local Plans and the determination of planning applications. They essentially seek to capture a range of issues / outcomes, but provide limited clarity with respect to reconciling any potential conflict.
GG1: Building strong and inclusive communities	This policy does not appear to address housing (unless this is considered to fall within 'good quality services and amenities' (paragraph B). Given one of the main priorities of the plan is to address housing / affordability, housing should be explicit in this policy.
GG2: Making the best use of land	The assumption that 'high-density' development represents the best use of land is overly simplistic and not supported by evidence. There are potentially other development / neighbourhood typologies that represent the best use of land having regard to the local area and population. Reference to 'high density' in the introductory paragraph should be deleted.
GG2 (A)	The desire to focus development on areas that are well-connected by public transport, walking and cycling is appreciated. However, orbital public transport connectivity (particularly in outer London) is poor, meaning connectivity to local services is also often poor and the current radial public transport network emphasises the primacy of central London at the expense of creating balanced communities in outer London. The draft Plan and list of infrastructure projects fail to ensure that outer London has the infrastructure required to support the significant level of growth envisaged.
GG3: Creating a healthy city	The principles of this policy are welcomed. However, the policy should recognise that health outcomes are the result of a number of determining factors, including choices made by individuals. Those involved in planning and development can seek to ensure that healthy choices are available to individuals (i.e. walking and cycling) but cannot compel them to be more active and healthy.
GG3 (E)	The Council supports improved access to green spaces. Policies relating to open space should recognise that open space provision is not simply about the quantity of open space in an area, but also quality. In some instances it may be appropriate to allow for the loss of open space if this facilitates improved access and quality of provision.

Chapter 1	Planning London's Future (Good Growth Policies)
London Plan Policy:	Representations
GG4(B): Delivering the homes Londoners need	Harrow supports the principle of housing being genuinely affordable, noting that Government approaches to affordable housing tenure (i.e. 80% discounted market rent) does not result in housing that Harrow residents on average incomes within the borough can actually afford. To meet Mayor's strategic target of 50% affordable housing at genuinely affordable rental levels will however in most instances require significant levels of grant support.
GG4 (E)	Harrow supports the desire to seek faster build out rates for developments granted permission but consider that this may prove difficult to achieve without significant incentives that could have negative impacts on other objectives of the draft Plan (i.e. not requiring viability reviews if schemes are built out in a timely manner could result in missed opportunities for more affordable housing).
GG5: Growing a good economy	Harrow supports this policy.
GG6: Increasing efficiency and resilience	Harrow supports this policy.

Chapter 2	Spatial Development Patterns
London Plan Policy:	Representations
General	London Borough of Harrow is not identified as a benefiting from significant infrastructure investment such as Crossrail.

A number of policies relate to encouraging development/intensification where there's future public transport provision, however, it is difficult for policies to encourage 'good growth' where infrastructure is not already present – especially if those 'potential' improvements do not eventuate. Approving planning applications where there is no (or poor quality) physical infrastructure on the basis of potential infrastructure is not considered sound planning practice. [In the main, Harrow does not benefit from any significant planned infrastructure |

Chapter 2	Spatial Development Patterns
London Plan Policy:	Representations
	improvements, as summarised in Table 10.2].
SD1: Opportunity Areas	Harrow welcomes the Mayor's intention to support and assist growth in Opportunity Areas such as Harrow and Wealdstone. Whilst there is an encouragement for growth, there is no guidance on how to regain industrial and business capacity which has been lost under Prior Approval or mitigate its loss with respect to vitality and vibrancy of town centres.

Paragraph 2.1.1 indicates that Opportunity Areas are the capital's most significant locations with development capacity. In Outer London boroughs such as Harrow, with the Mayor's proposed approach to suburban intensification, this is not the case as two-thirds of Harrow' housing target is anticipated to come from small sites outside the Opportunity Area and not necessarily in areas accessible to town centres and public transport nodes.

The Council welcomes the reference to the potential West London Orbital Line at paragraph 2.1.55 and the recognition of its potential to unlock growth in the area between Brent Cross to Hounslow (via Oak Park). |
| SD2: Collaboration in the Wider South East | The Council welcomes the recognition in the Plan of this wider collaboration which is currently missing from the Mayor's draft Housing Strategy. It is understood that the Mayor wants London to meet its own housing needs, but this is a very high risk strategy and does not take into account how the wider South East has historically supported London's growth. The targets set for individual boroughs, particularly those in outer London are likely to be unachievable for a variety of reasons, including unrealistic small sites capacity, market saturation, lack of affordable housing funding, skills/capacity shortages and lack of funding for associated infrastructure. In addition the draft London Plan places additional constraints where they are not needed and where local areas should have more discretion taking account of local evidence base work and national policies. These will further limit potential which might otherwise have existed, e.g. review of green belt boundaries and SIL/LSIS for more than purely employment uses.

As such the Mayor should be as pro-active and vocal about London's housing needs being addressed in the wider South East as he is about the need for affordable housing and the associated mechanisms to deliver. Currently the Mayor's commitment is weak in terms of providing clarity on how needs will be met. In the current context of no regional planning and very little appetite to explicitly encourage South East councils to assist in meeting London's housing need, it is difficult to see much changing. Greater emphasis should also |

Chapter 2	Spatial Development Patterns
London Plan Policy:	**Representations**
	be placed on ensuring edge of London councils are explicitly considered as part of London's housing market for the purposes of Housing Market Area assessments to identify local housing targets and actively take account of meeting the needs generated within this area as a requirement of the duty to co-operate.
SD3: Growth locations in the Wider South East and beyond	This can be seen as a pragmatic response given the lack of wider regional planning. Nevertheless, it is not necessarily guiding development to locations that make sense from a planning perspective and also there is no guarantee that impacts on London will be direct. As such the Council urges a more robust response to the wider South East issue as set out in its response to SD2.
SD4: The Central Activities Zone (CAZ)	No Comment
SD5: Officers, other strategic functions and residential development in the CAZ	No Comment
SD6 (A) Town Centres	The Council supports the enhancement of the vitality and viability of town centres, however as suggested under A(2), a significant amount of commercial floor space has already been lost within the town centre (Table 6.2 requires Harrow to retain floor space – and indeed Local Evidence supports this). This does not give account for the significant loss of commercial floor space through the prior approval. Harrow would be more cautious about encouraging housing led schemes within the town centre without robust justification about the on-going success of the role of the town centre, and London Plan policy should allow for developments to be considered more in line with local evidence.
SD6 (B)	Guidance on how this should be achieved at a London wide level should be detailed by the Mayor, to ensure a holistic approach in ensuring town centres do not fall into decay.
SD6 (C)	The Council supports the principle of housing in town centres and has local policies to support this. Residential only schemes within the town centre are of concern, given the amount of office to residential

Chapter 2	Spatial Development Patterns
London Plan Policy:	Representations
	conversions undertaken under Prior Approval. In Harrow the losses have reached a point where new office development (of modest scale) is becoming competitive against residential with respect to land values / viability. This policy should allow for proposed residential only developments to be considered more in line with local evidence.
SD6 (E)	The Council supports the increase in housing and the managed re-development of existing office space. However, this should not be at the risk to the viability and vitality of the Town Centre. In order for LPA's to make a planning decision on the cumulative impact of Prior Approval, a threshold or guidance should be provided by the Mayor to justify planning decisions i.e. at what point (% losses, vacancy rates etc) would the impact of prior approval tip the balance towards retaining office space?
SD6 (J)	Ground floor residential is a key indicator that a parade or centre is in decay, and cannot support retail / employment floorspace. Residential use in these locations would not be reversible and would result in inactive frontages, the loss of vibrancy and vitality within centres and poor quality residential. Policy should allow for developments to be considered more in line with local evidence.
SD7: Town centre network (B)	Harrow is encouraged that it retains the Metropolitan Town Centre status, although again raises concerns about potential re-classification to a lower level in the hierarchy where there is a decline in commercial (etc) floor space. Harrow has experienced significant loss of commercial floorspace from its town centre stocks outside of its control, through the Prior Approval process. Harrow welcomes any Mayoral support for the use of Article 4 orders to halt this decline, to assist in retaining its standing as a Metropolitan Town Centre.
SD8: Town centres: development principles and Development Plan Documents	The Council supports this policy.
SD9: Two centres: Local partnerships and implementation	Harrow welcomes the encouraging policy to implement Article 4 directives to assist in the loss of office space within town centres.

Chapter 2	Spatial Development Patterns
London Plan Policy:	Representations
SD10: Strategic and local regeneration	This policy requires boroughs to identify Strategic Areas for Regeneration based on 20 per cent most deprived lower super output areas in England. Within Harrow, these are Rayners Lane Estate (where redevelopment is almost complete) & Woodlands and Cottesmore Estates & Woodlands Drive Estate in Stanmore where there is currently no regeneration plans and which are outside the Opportunity Area. Resourcing will be a significant constraint with respect to the ability of boroughs to proactively progress regeneration programmes (i.e. limited HRA borrowing capacity for physical regeneration and limited revenue budgets to support social / environmental regeneration).

Chapter 3	Design
London Plan Policy:	Representations
D1: London's form and characteristics	This policy is supported in principle, but this character based approach in criterion (B)(1) potentially conflicts with the London Plan's assumptions on small site capacity and the statement in policy H2 Small Sites criterion b) that boroughs should: "recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments." The emphasis on Figure 3.1 circular economy of hierarchy for building approaches which favours 'retain' or 'retro-fit' is also somewhat at odds with these policy criteria. The density assumptions for suburban areas in the SHMA including the small sites work primarily ignore these elements of policy. Either existing high quality character which is appreciated by the community is important to a place and should be enhanced / maintained, or if it isn't policy D1 should not be the principal element on which the building blocks of new development should be founded. There should be some clarity in either the policy justification for this or the H2 policy.
D1(B)	The Council supports this policy. However, there is concern that this policy requires development to respond to the surrounding context, yet Policy H2 Small Sites is encouraging developments that may be substantially discordant with the existing vernacular. This would be especially evident in outer London boroughs.
D2: Delivering good design	Whilst this policy is supported in principle as a means to identifying an areas capacity for growth, this level of assessment will be challenging in the context of resourcing and capacity constraints within Local Planning

Chapter 3	Design
London Plan Policy:	Representations
	Authorities. Apart from conservation areas, many local authorities will not have detailed assessments of their areas. Such an exercise would require a significant amount of resource (time and money) to create data that is not needed for high-level masterplanning purposes or to achieve good design.
D2: (E-G)	The use of Design Review Panels is supported by the Council and Harrow has established such a panel. However, there needs to be clarity at what level these are used at, so as not to become another financial burden on developers (especially smaller scale). The Council would propose that the utilisation of these is determined at a local level.
D3: Inclusive design	The Council supports this policy. However, there needs to be clarity on what the role of planning is and what is covered by other legislation, e.g. building regulations. Some of these elements, in association with policy D10 Safety, Security and Resilience to Emergency, currently unacceptably blur lines and increase expectations on planning which cannot be met as there is limited or no legal basis. This risk causing the potential for delay to or judicial review of decision making which might might stray into other areas that are subject to other legislation outside planning. The London Plan will need to reflect the conclusions and Government response to the Independent Review of Building Regulations and Fire Safety expected from Spring 2018.
D4: Housing quality and standards	The Council supports the Housing Quality and Standards Policy.

Greater clarity should be provided with regard to one bedroom, one person flats (not being set out as a studio) – and greater detail on Large-scale HMO/ 'Collective Living' arrangements, that whilst assist in providing housing choice, do not always provide a high quality standard of living. |
| D5: Accessible housing | This policy is supported.

The supporting text could provide greater clarity on the extent to which it applies to new dwellings (i.e. new build and / or change of use / conversions). The policy states its application to "residential development". The policy justification however refers to its application to "all new build dwellings" which provides ambiguity over development such as changes of use to residential and conversion which must be clarified, particularly if the Mayor envisages a significant proportion of new housing (particularly in Outer London) coming from small sites (i.e. through conversions / extensions etc). |

Chapter 3	Design
London Plan Policy:	Representations
D6: Optimising housing density	The Council supports the policy to ensure sites within the Borough make the most efficient use of the site. However, being a design led plan, there is concern over introducing a policy that provides such a subjective matter as the mechanism to determine an appropriate density for a site. This policy must be linked with Policy D1 and D2, in terms of design review panels (DRPs). Clarity must be provided in terms of the remit/process/management of such DRPs.
D7: Public realm	The overall principles behind the policy are supported.

The draft policy however does not sufficiently recognise ongoing maintenance requirements of public realm and the pressures on public finances to maintain the quality of spaces in the longer term, which is sometimes harder to achieve than the initial capital sum of installation. A whole-of-life approach to design, materials selection, construction and maintenance should be included within the policy to ensure that adequate arrangements are in place for ongoing maintenance (including, for example, ensuring materials can be readily sourced in the future to avoid different materials being used for ad-hoc repairs, thereby diminishing the ongoing quality / design integrity of the public realm).

There could also be a greater emphasis specified around relationship between 'cleaner, greener, safer' theory. This is that a cleaner and greener location creates increased feelings of safety. So design from the outset should be around ensuring increased cleanliness and greenery is important. This also relates to street furniture and 'seating' as this can also create an area for anti-social behaviour and enviro crime. Areas for community members to meet is also essential, it needs to be designed in the right way and area to ensure a reduction of anti-social behaviour opportunities. Lighting is also a critical element of this. |
| **D8: Tall buildings** | The principle of the policy is supported.

There does however need to be a greater emphasis on a Local Plan led approach to the provision of tall buildings and the London Plan should give this greater prominence. Such a requirement for Local Plans to identify areas suitable for tall buildings (applying the criteria outlined in Policy D8) shouldn't however be so prescriptive (i.e. specific areas / heights must be defined) so as to preclude Local Plans from incorporating a locally-defined, criteria based approach to assessing whether a tall building / buildings is appropriate in any given location. The planning application process should however not be the way in which the identification of location of these buildings is pursued. In the current London Plan there is an ad-hoc approach to tall buildings |

Chapter 3	Design
London Plan Policy:	**Representations**
	as if they can be justified in almost any location. .
	Tall buildings historically have created communities where there is little opportunity for social interaction, or feeling of community. It would be beneficial if there was reference to the need to promote incorporating opportunities for social interaction into the design of the building.
	Mid-rise buildings could potentially be a more appropriate form of intensifying an area / facilitating increased levels of housing and the draft Plan should reflect that a range of building typologies / heights may be achieve the desired outcomes / housing targets.
D9: Basement development	The Council support this policy. However, Harrow considers that the policy could be amended to indicate that boroughs should ensure that their Local Plan policies address basement development rather than specifying they must have a policy specifically relating to basements.
	The paragraph 3.9.5 mentions structural stability which is not a planning matter.
	The term Construction Method and Management Plans in para 3.9.4 to be amended to Construction Logistics Implementation Plan. Consistency in terminology used across boroughs and TfL will ensure these plans are able to be consistently scrutinised in accordance with industry best practice and TfL best practice.
D10: Safety, security and resilience to emergency	The scope and application of this policy could be better defined, with a focus on perceived higher risk locations / buildings only where impacts could be significant. It is not clear what detection means, implying longer term intelligence/monitoring rather than attributes associated with promoting natural surveillance. The relationship between planning matters and other areas could be better defined (i.e. building control). Rather than covering issues addressed elsewhere (i.e. building control), more emphasis could be placed on the importance of designing egress and ingress routes relating to emergency and evacuation plans. Emergency exits are not necessarily the same as this, as general main egress and ingress routes for buildings/areas with potential for large crowds need higher consideration.
D11: Fire Safety	The Council support the aspirations of the draft policy in terms of ensuring the safety of London's population.
	The Council however has a number of concerns regarding the practicality of this policy.

Chapter 3	Design
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	The scope and applicability of the policy needs to be better defined with respect to what issues it is seeking to respond to (understood to be the Grenfell Tower disaster). Seeking a Fire Statement for all major developments (i.e. ten dwellings or above) does not have regard to where such a requirement (above that required by the Building Regulations) would add value and address the identified issues that the policy seeks to respond to. Such a requirement would apply to low-rise, small scale infill development of ten units, where fire safety issues are less complex than a tower block of 20 storeys / 200 units (as an example).
	There are proposed changes to the Building Regulations imminent. It is queried if there have been any discussions between the Mayor (and GLA family) and Government relating to changes to building control regulations. There is an overriding concern that the standards / requirements that the Mayor is setting out in policy are inconsistent with other legislation and therefore undermine the achievement of the policy's objectives. The Council feels that the London Plan needs to provide greater clarity on these issues and ensure that the scope of its proposed policies avoids duplication of responsibilities.
	In the Mayor chooses to continue with the policy as drafted, then the Council would suggest that the Mayor needs to consider / provide guidance/detail on how the required 'Fire Statement' would be agreed and implemented as there are a number of practical issues, For example, how would a variation to an approved planning permission be dealt with if Building Regulations approvals / detailed design result in an alternative strategy. This exercise is likely to demonstrate the conflict between the Mayor's approach and established legal frameworks.
	The Council is concerned how the review of such a document would be resourced given that an independent review maybe required – or how payment for under resourced Building Control Departments to review/negotiate with developers would be secured.
	The Council would request that the Mayor provides clarity on what is the 'highest standards' as set out in D11 (A). Currently the Building Regulations only require the minimum requirement. The Mayor must specify what standards (above the Building Regulations) would be required and be part of the policy.

Chapter 3	Design
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D11 A(4)	The Council would suggest that this (i.e. 'confidence in' is an unreasonable measurement). The statement as submitted must be fit for purpose – or achieve higher standards as suggested by the Mayor.
Paragraph 3.11.2	It is impossible to provide a policy for the "likely behaviour of people and expectations' – the document should be technically sound and easy to be understood by lay people. Amend this paragraph as follows; …and providing suitable and convenient means of escape which all building users can have confidence in, applications should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole.
3.11.2	Whilst it is encouraged that materials are thought out at an early stage of any development, the majority of planning applications secure details of materials by way of condition, once the principle of development (i.e. use, scale, massing, layout etc) have been agreed by grant of planning permission. If details are agreed (as part of a Fire Strategy) at application stage there is concern that this will create additional work (and delay) at detailed design stage and construction where details may change and therefore require amendment of the Fire Strategy through the amendment of relevant conditions / approved drawings.
3.11.3	Building regulations only require developments to think of the use of sprinklers, but does not require their use. The Mayor should qualify if these would be a requirement or not. If so, they must be set in policy, or just remove their reference. The Council would also query that if this now a requirement, what impacts would this have on scheme viability.
3.11.4	A concern that there is a conflict with Policy D5, paragraph 3.5.6
D12: Agent of Change	The Council supports the inclusion of the Agent of Change policy. The Council is however concerned about the ability for developments to satisfactorily mitigate noise in relation to policy E7 which seeks to intensify existing industrial estates/mixed uses etc. Even in the event that the proposed new development (being a sensitive receiving environment) may have measures in place, there is concern that this maybe insufficient to provide future users of an industrial park/site confidence to take up a lease/purchase the property. It is considered that agent of change should assume worst case scenario / impact i.e. B2 rather than for example, current B8.

Chapter 3	Design
London Plan Policy:	Representations
	Whilst many buildings are able to incorporate further materials into the built fabric, this can end up having an impact on viability, which leads to potentially fewer contributions such as affordable housing. The Agent of Change policy focuses on building measures (layout / materials etc) that can be implemented to address reverse amenity impacts. However, it is difficult to achieve suitable outlook and noise mitigation for outdoor amenity space, which is critical to achieving good quality homes and conflicts with D4 Housing Quality and Standards paragraph 3.4.11.
D13: Noise	The Council questions the resource required to undertake such an assessment of Quiet Areas of the Borough, and also such policy may be a duplication of polices such as the example shown – Greenbelt and MOL; already has appropriate levels of protection within the draft London Plan and NPPF.

Chapter 4	Housing
London Plan Policy:	Representations
H1: Increasing Housing Supply	The Council supports the intent of this policy, recognising the need to facilitate a substantial increase in housing delivery to address housing affordability within London. We however object to the overall target set for Harrow (13,920 over ten years, or 1,392 per annum). These objections are two-fold. Firstly we consider that the London Plan overstates housing need in London and that the London-wide housing targets set in the draft Plan to meet this need are therefore too high. Secondly, we consider that the housing target for Harrow is undeliverable, particularly in the context of its reliance on small-sites (i.e. Policy H2). The draft Plan identifies housing need in London as 66,000 homes per year, based on the GLA prepared Strategic Housing Market Assessment (SHMA). Based on work commissioned by the West London Alliance (WLA), the Council considers that the average household size predicted in the London SHMA and draft London Plan is potentially too low, and does not adequately reflect changing patterns of living and evolving definitions of what a household is. This under-estimation of average household size means that housing targets set in the Plan could potentially therefore be higher than needed and of the wrong sort (smaller rather than larger), as required by London's current and future population. New projections prepared by the ONS

Chapter 4	Housing
London Plan Policy:	Representations
	(rather than CLG) due to be released later in 2018 may provide a better reflection of household sizes.

The draft Plan proposes a significantly different approach to housing, with a much stronger reliance on windfall / small sites, particularly in Outer London; such a reliance on uncertain, unidentified windfall / small sites is itself is considered contrary to the National Planning Policy Framework as the evidence that these sites will come forward is not compelling. The proposed ten year housing target for Harrow is 13,920 homes (1,392 homes per annum), which represents a 135% increase over our current target of 5,930 homes (593 homes per year). The Council is concerned about the scale and deliverability of this increase which is significantly greater than the 55% increase across all of London. The Council has demonstrated an ability and willingness to increase housing outputs from larger sites (for example, the Kodak site in Wealdstone has seen its capacity increase from 900 homes at initial outline permission stage to almost 1,800 homes) and this is reflected in the large-sites capacity element of the London Strategic Housing Land Availability Assessment (SHLAA), with many sites currently being delivered. The significant increase in Harrow's overall housing target is almost entirely due to the SHLAA's identified capacity from small sites within the borough, which the Council considers is based on a flawed methodology and is undeliverable (see comments on Policy H2 below). |
| H2: Small Sites | The Council acknowledges that small sites can potentially make a contribution to housing stock within the Borough. However, the significant increase in Harrow's overall housing target is almost entirely a result of the small sites target for the borough in the draft Plan. The Council has significant concerns about the small sites target for the borough, which represents a significant reliance on windfall / small sites, which the draft Plan indicates will contribute 965 dwellings per year out of the overall target for the borough of 1,392 homes per year (i.e. 69% of our overall target, compared to 38% of the overall London-wide target). We also have several concerns about the draft policy itself. The Council therefore objects to the small-sites target for the borough and its incorporation into the overall housing target for Harrow.

The Council has significant concerns about the methodology used to identify the housing capacity of small sites, noting that this methodology and approach to small sites were not discussed with boroughs prior to the draft targets being set. The Council considers the methodology is not robust, in that it uses a 'proxy' for potential housing yield from small sites rather than a detailed assessment of the potential capacity from the three potential types of small sites capacity identified in Policy H2 Small Sites of the draft Plan. The small sites targets set in the draft Plan are therefore not considered to be based on robust evidence and are most likely to be an overestimation of capacity. Such a reliance on uncertain, unidentified windfall / small sites is itself is |

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London Plan Policy:	Representations
	considered contrary to the National Planning Policy Framework, which requires (paragraph 48) that there must be 'compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens'.

The Council considers the small sites targets are undeliverable. Harrow currently averages around 125 homes per year from small sites in a relatively supportive policy environment. The proposed small sites target of 965 homes per year therefore represents an 8-fold increase from such sites. The proposed small sites policy and its presumption in favour of housing development on sites are unlikely to achieve such a significant increase in delivery of housing on small sites. The draft Policy is not supported by any evidence that indicates why such sites have not been coming forward at the level anticipated by the GLA and how the draft Policy will address these reasons. The Viability Assessment that forms part of the evidence base for the draft Plan arguably does not properly consider the types of developments that are envisaged by the small sites policy and the SHLAA methodology i.e. are these sites genuinely viable.

There is also concern that the draft Policy is open to interpretation as to what constitutes a small-site and therefore which proposals the presumption in favour of development would apply (noting that the Mayor considers this presumption is somehow going to result in an 800% increase housing from such sites coming forward in Harrow). For example, what constitutes an 'underused site'? Could a scheme capable of accommodating 26 homes be reduced to 25 homes to remove any in-principle issues by benefiting from the presumption in favour of development? The Council is concerned that many schemes brought forward under Policy H2 could end up being appealed on the basis of disagreements as to whether the site is considered a small site and benefits from the presumption in favour of development.

It is also unclear why the Mayor has chosen to not include the word 'sustainable' in the presumption in favour of small housing; its exclusion is inconsistent with the NPPF (paragraph 14).

The Council also has concerns about the fragmented and dispersed nature of sites coming forward through the small sites policy and the implications of this for infrastructure planning (for example, see transport below) and the Mayor's desire for 'good growth'. Such sites are also constrained with respect to how they can deal with other policy requirements such as flood risk / urban greening. |

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London Plan Policy:	**Representations**
	A further concern, the NPPF (para 48 and 53) seeks to resist inappropriate development of residential garden land, where it would be harmful to the surrounding area. This national planning policy requirement has filtered through to the Harrow Core Strategy where new development is directed towards town centres, particularly the (now) Harrow and Wealdstone Opportunity Area. A Garden Land SPD (2013) was also published to support the direction of the NPPF and aspirations of the Core Strategy (2012). The Small Site Policy, whilst not slavishly linked to only garden land sites, now appears to fly in the face of these documents, and may result in the opening up of residential gardens. The Council query the soundness of this policy in relation to the NPPF.
	Additionally, Harrow has concerns about the usefulness of the design codes the draft Plan requires boroughs to prepare, given that there will be a wide variety of small sites and each one will have its own constraints and context; the codes are unlikely to give developers the certainty they seek in order to bring the small sites forward any more than the current local policy context.
	A number of 'small sites' across the Borough, apart from providing open areas of no development that is a strong character of the Metro-land, also assist in mitigating impacts such as flood risk The Council would query whether policy H2 would have adequate consideration to the impacts on flood risk in the area, specifically with regard to what some small sites offer the wider area. The Regional Flood Risk Appraisal and Sustainability Appraisal are considered not to fully address these potential conflicts. Additionally, the removal of these (often) green spaces, would conflict with the Mayors strategy for London to be 50% green by 2041. Smaller schemes having to achieve a 'pass' in terms of table 8.2 (Urban Greening Factors), may be unreasonably burdened on providing greenspace etc above the 'net' loss of the existing space.
	Given this, and the relatively permissive policies that Harrow has in relation to encouraging housing schemes, it is unlikely that the unrealistic targets would be able to be achieved.
	Based on the above, the Council does not feel that it is in a position to offer a re-wording of the proposed policy, as the fundamentals of it (i.e. methodology, evidence base and deliverability) appears to be flawed. Policies seeking to increase the delivery of housing from small sites should be a matter for Local Plans to address and Policy H2 should be deleted. Draft Policy H2, associated small-sites targets and presumption in favour of small sites risks destroying the character of the area as it does not represent a considered approach

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	to how suburban intensification and change in character can be pro-actively managed.
H3: Monitoring Housing Targets	The policy is supported, subject to reconsideration of the small sites target.
H4: Meanwhile Use	The Council supports the principle of this policy. However based on the Council's own experience for this to be financially viable, a lifespan of no less than 10 years would be required. It is therefore unclear how this policy would provide any meaningful contribution to overall housing supply in London.
H5: Delivering Affordable Housing	The Council supports the majority of this policy. However, there are two areas of concern. Firstly, whether there remains scope for locally set affordable housing targets, having regard to local evidence such as Strategic Housing Market Assessments and the viability appraisal of the draft Local Plan (as required under the NPPF). Secondly, the Council questions the planning policy basis for treating public sector land (outside the remit of the Mayor of London) differently to private sector land. Such a requirement reduces the ability of local authorities to make the most appropriate use of their land having regard to a range of planning objectives such as cross-funding the provision of new / improved infrastructure (i.e. planning considerations are not just limited to affordable housing).
H6: Threshold approach to applications	The Council supports the threshold approach policy As noted above, the Council considers it unreasonable that Council owned land would result in a higher Affordable Housing threshold than private developers. Whilst it is the Mayor's prerogative to require organisations within the Mayoral family (i.e. TfL) to achieve higher levels of affordable housing, such an approach is considered unwarranted for local authorities as it removes the ability to identify local priorities for Council owned land whilst enduring development remains viable. The Council requests that this policy be amended to be consistent with any other developer. The Council support the use of review mechanisms.

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London Plan Policy:	**Representations**
H7: Affordable Housing Tenure	The Council support this policy
H8: Monitoring of Affordable Housing	The Council support this policy
H9: Vacant Building Credit	The Council support this policy
H10: Redevelopment of existing housing and estate regeneration	The Council support the overall intent of this policy. The Council supports the need to protect existing tenants' ability to remain on site in relation to their affordable housing needs and the availability of low cost affordable housing overall. Flexibility does however need to be shown to reflect the circumstances of individual projects, recognizing that such regeneration often is a very complicated process balancing up a wider range of issues than the affordable housing provision element (i.e. decanting arrangements, site-specific constraints, and overall scheme viability).
H11: Ensuring the best use of stock	The Council support this policy
H12: Housing size mix	As noted above, the Council has a number of concerns regarding the London-wide SHMA, particularly with respect to assumptions relating to household size. As a result of this, it is considered that Policy H12 and its supporting text understate the ongoing importance of dwellings with three or more bedrooms (particularly in Outer London) with respect to meeting housing need. Point (C) is however considered too prescriptive. Boroughs should be able to provide guidance as to the desired dwelling size / tenure mix. Such guidance would be best provided in Supplementary Planning Documents or by reference to the current Strategic Housing Market Assessments (SHMA) rather than in policies that are more difficult to amend if circumstances / evidence base changes. Paragraph 4.12.3 is also considered to promote overcrowding by implying two-bedroom units are acceptable accommodation for families.

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H13: Build to Rent	The Council support this policy

However, whilst the Council recognises the role PRS can play in offering a range of housing options and accelerating build-out rates, regard needs to be given to the prevalence of such schemes within a locality in order to ensure that mixed and balanced communities are achieved and overall affordable housing provision is not significantly affected. The Policy should therefore make reference to ensuring such balanced communities / localities. |
| H14: Supported and specialised accommodation | The Council support this policy |
| H15: Specialist older person housing | The general intent of this policy is supported. Reference to identifying sites is considered unnecessary and potentially limiting – reference to 'identifying opportunities' would be more appropriate.

The indicative benchmark for Harrow is 165 units per annum. As such developments are likely to be on larger sites due to economies of scale, this represents a significant proportion of Harrow's large site capacity (circa 430 units per annum), and hence why reference to identifying suitable sites is considered to reduce flexibility. |
| H16: 16 Gypsy and Traveller accommodation | The Council is concerned that the draft Plan's definition of Gypsies and Travellers goes beyond Government policy and the reasons for doing so (paragraph 4.16.2) do not appear to be backed-up by evidence. The onus is on the Mayor to demonstrate why the definition should go beyond that of Government policy. |
| H17: Purpose-built student accommodation | The Council support this policy and its emphasis on ensuring mixed and inclusive neighbourhoods. The ratio of 3:1 (three bedrooms counting as one dwelling) in Policy H3 addresses the potential for new student accommodation within the borough to undermine the ability to meet overall housing targets (expressed as dwellings). |
| H18: Large-scale purpose-built shared living | The Council support this policy

The Council would encourage the Mayor to produce guidance for this form of residential accommodation. This should provide guidance on minimum standards, a ratio to determine a satisfactory level of communal space, |

Chapter 4	Housing
London Plan Policy:	Representations
	design, and ensuring that developments do not become insular and not stitching into the fabric of the local community.

Chapter 5	Social Infrastructure
London Plan Policy:	Representations
S1: Developing London's social infrastructure	The Policy is supported
S2: Health and social care facilities	The Policy is supported. As noted in the response to Policy H2: Small Sites, the Council is concerned about the impact of that policy on the ability to plan for infrastructure such as health. This concern is understood to be shared by NHS Clinical Commissioning Groups, such as North West London CCG, who have indicated: "The policy and ten-year targets in Table 4.2 would significantly increase the contribution of small sites (below 0.25 hectares in size) to meeting London's overall housing delivery. The capacity of small sites represents 38% of all supply and has increased from 25% in the current Plan (the 2013 SHLAA). In some outer London boroughs (Sutton, Richmond, Bromley, Bexley and Harrow) small sites contribute to over two thirds of housing supply, whereas in the two Development Corporations the contribution is less than 5%. Part D of the policy requires boroughs to apply a presumption in favour of small housing developments which provide between one and 25 homes. Given the policy presumption, the cumulative impact of small developments on health infrastructure could be significant, particularly in parts of London which have traditionally experienced relatively low growth. We would expect that this impact is addressed as part of the borough infrastructure planning process, but given the 'windfall' nature of small sites this impact will be difficult to predict and plan for. As a result there is a risk that the cumulative impact of small developments on health infrastructure in some boroughs will not be adequately addressed."
S3: Education and childcare facilities	The overall intent of this Policy is supported.

Chapter 5	Social Infrastructure
London Plan Policy:	**Representations**
(A)	The Council however considers that this policy is overly prescriptive and needs to be more flexible in recognition that school place requirements can change quickly and that there are several stakeholders involved in the provision of school places.
	For example, it may not be practical to locate childcare facilities as part of new primary school provision (as implied in the draft Policy) given space constraints on smaller sites. Some boroughs may only wish to identify broad locations for new school place provision in the Local Plan, rather than identifying specific sites. This is particularly the case at present, where local authorities do not have much influence over the development of new schools in the current system. The Education Skills Funding Agency (ESFA) approves new free schools, often purchasing land, and does not necessarily consult with local planning authorities consistently through this process. It would be helpful if the London Plan recognised this reality for the boroughs, as many of the policies set out in this section are more directly related to the ESFA's role. This is particularly the case for the points in B relating to quality, as many boroughs have significant concerns about the quality of some new schools approved by the ESFA.
S3: Education and childcare facilities **(B)**	Harrow supports the principle of locating education facilities in areas of need and welcomes its inclusion in the London Plan. Building new schools in areas where there is no demand for places can destabilise the school system, making some schools financially unviable.
	Harrow supports the proposals set out under B as a framework for developers to take into account when planning a new school and work proactively to encouraging developers to put quality at the forefront of new school developments. However, we would support the addition of a caveat that it may not be possible to meet each of these criteria in every case due to site and time restrictions.
	The Council requests that two additional criteria should be included under (B):
	• use a quality framework, such as CABE's 10 point plan, to ensure that quality is built in to every new school development.
	• design new provision to be as flexible as possible to accommodate different teaching methods and potential changes in demand for places.

Chapter 5	Social Infrastructure
London Plan Policy:	Representations
	In relation to shared usage, there does however need to be a greater focus on ensuring genuine availability by community groups to the facilities provided in educational establishments as heads / institutions have different approaches and S106s on ensuring accessibility have not always been followed willingly. Often whilst open in principle, other methods such as limited time slots and pricing mechanisms can be used by the institutions to make genuine public accessibility more difficult than it needs to be/ result in no community use. Schools are essentially profiting from being allowed to expand (often onto open space) where such an expansion has been justified in terms of increased community access but this increased access needs to be better secured / managed.
S4: Play and informal recreation	The overall intent of this Policy is supported. However, it is overly prescriptive. The Mayor has no statutory duties in relation to play, yet proposes to ensure that all boroughs undertake audits and produce strategies on play. Many boroughs already undertake strategies and audits, but for many others this will be an additional burden at a time of considerable financial constraint.
S5: Sports and recreation facilities	The Policy is supported.
	There are however fundamental challenges on this matter related to public sector funding/ increased pressure due to population rises / opportunities for land for extensive new facilities which will place a greater reliance on provision on multi-functional artificial pitches. There may also be current restrictions on some facilities related to hours where additional lighting is not required. The policy could be amended to allow greater flexibility to assist in increasing capacity of facilities.
	Paragraph (C) should also be amended to include reference to Policy G2: London's Green Belt and G4: Local green and open space, to cover all circumstances where facilities maybe proposed on existing open space.
S6: Public toilets	The Policy is supported
S7: Burial space	The Policy is supported

Chapter 6	Economy
London Plan Policy:	Representations
E1: Offices	Policy E1 Harrow supports the overall proposed policies for Offices. However we have concerns about how Policy E1 & the town centre designations (as set out in Table A1.1) will be used in practice (see further comments below). We also believe that the policy could be broadened to include protection for small conference / meeting spaces for microbusinesses and small businesses. There is demand for flexible meeting spaces that can accommodate up to 50 attendees, who may frequently work from home, but on occasion need small conference and meeting space.
E1: Offices (A)	Harrow supports the Plan's recognition that office space needs to be of a quality sought by the market. Harrow's own evidence base (Economic Development Needs Assessment) suggests that with the significant loss of office space within the borough through permitted development rights, rental values have now reached a point where refurbished and new build office space is becoming viable when compared to alternative uses such as residential. Harrow however lacks competitiveness with respect to locational characteristics. Outer London can only be competitive against central London if orbital connections are improved.
E1 (B)	Table 6.1 indicates that the significant majority of new office development is anticipated to occur in Central London, further embedding the primacy of these areas for employment at the expense of Outer London. The draft Plan does little to re-balance employment growth and therefore fails to achieve its objectives relating to balanced communities, reducing the need to travel etc. With Government proposals for Business Rate retention favouring those areas with significant employment, financial benefits of employment uses will be unevenly distributed and have a significant impact upon the ability of outer London boroughs to provide services, noting that the draft Plan envisages significant increases in housing targets for outer London.
E1 (D)	Policy E1 & Figure A1.4 & Table A1.1 in Annex 1 identifies town centres that will be supported for office development. For LB Harrow, this means that Harrow Town Centre (GLA Office Guideline - B) and Wealdstone, Stanmore and Edgware (part) town centres (GLA Office Guideline - C) - albeit fairly limited office role - is recognised. Given the pressure to redevelop sites for residential accommodation across the borough, we consider that this policy is unhelpful in that developers will now seek out office space in other town centres to redevelop as their protection will not be supported by this policy. We suggest that at least Pinner and North Harrow should be considered as "C" office locations, based on the GLA's own Town Centre Health Check.

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E1 (E)	Support for boroughs making Article 4 Directions to protect existing offices is welcomed. The Mayor's evidence base is a positive addition to Harrow's local evidence base to justify Article 4 Directions.
E1 (G)	Support for lower cost and affordable workspace is welcomed in principle but this will need to be balanced with the impact of this on overall scheme viability, particularly in Outer London where new office space is likely to be part of mixed use development that is predominately residential (with associated affordable housing requirements).
E2: Low-cost business space	Harrow welcomes the principle of supporting the retention and provision of low-cost B1 business space but consider that further information is required with respect to what constitutes low-cost space (beyond that indicated in paragraph 6.2.2). Some space in Harrow is low cost due to it being poor quality, unsuitable size / configuration or offered on a short-tenure basis. Low-cost space that would support SME or start-up businesses needs to be low cost relative to the quality of space offered. The policy should give particular consideration to the provision of low cost workspace near to local and district centres. This will contribute to a mixed economy and support the day time economy.
E2 (B)	This policy should be expanded upon to reflect the considerations outlined in paragraph 6.2.4 as it currently makes no reference to 'viable existing business uses on site'.
E2 (C)	Policy E2 (C) could be strengthened to outline the issues that need to be addressed in considering the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.
E3: Affordable workplace	Harrow welcomes the support for affordable work space, the criteria outlined in Policy E3 and the recognition that boroughs may wish to include more locally specific policies in their Local Plan. As noted previously, the impact of affordable work space provision on broader scheme viability and the provision of affordable housing should be recognised in the policy. It is recognised that in some instances however that affordable work space will be required (and therefore prioritised) in order to make the scheme acceptable in planning terms (i.e. to offset the loss of existing space / businesses). Harrow's Community and Voluntary Sector and microbusinesses will benefit from the proposed policy on affordable workspace. The Council supports monitoring arrangements being built into Section 106 Agreements, particularly in respect to occupancy rates, use class of occupants, size of unit occupied and jobs created. The

Chapter 6	Economy
London Plan Policy:	Representations
	policy on Affordable Workspace would be strengthened by the requirement for the provision of an approved Management Plan for the space. The Council would prefer to enter into agreements on Management Plan for a space, rather than affordable space being transferred to the management of Workspace providers, who may have no local understanding of local disadvantaged groups and existing business support provision.
E4: Land for industry, logistics and services to support London's economic function	Harrow welcomes Policy E4's requirement of no net loss of industrial floorspace capacity (and operational yard capacity) as the Council's own evidence base supports the need to retain such space within the borough. It is unclear however within this Policy as to whether the retention of floorspace within boroughs applies to each industrial site or across the borough as a whole. There may be instances where a Local Plan (through site allocations for example) may wish to propose the loss of industrial floorspace on one site (due to inappropriate location, provision of community infrastructure) but identify an opportunity on another part of the borough for industrial intensification to offset this loss. The policy should make it explicit that this can be done (with any industrial intensification occurring before the subsequent loss of floor space on the other site/s).
E4(A)	Clarity should be provided in this policy as to whether boroughs are expected to plan for each of the industrial and related functions listed on part (A) as it will prove difficult to project requirements for individual industrial sectors at borough level and each borough will have its own competitive advantages and disadvantages with respect to the sectors identified. Part C of the policy implies this should be done at an industrial property market area level.
E4(D)	Harrow is identified in the 'retain' category for industry. However many of the criteria relating to the preferred locations for the retention of industrial floor space do not apply to Harrow due its limited access to the strategic road / transport network and relatively small scale industrial area precluding many of the uses listed in (2) and (4). These criteria could undermine the borough's ability to retain industrial floor space and the application of the policy should be qualified / limited to boroughs where some release of industrial land is envisaged.
E4(G)	Harrow supports the Mayor's view that Article 4 Directions should be used to assist in the retention of industrial floorspace; this is supported by the Council's own evidence base.

Chapter 6	Economy
London Plan Policy:	Representations
E5: Strategic Industrial Locations (SIL)	Harrow supports the removal of two different types of SIL and focusing SIL on industrial uses rather than a combination of industry / offices.
E6: Locally Significant Industrial Sites	The Council supports the principle of this policy, subject to the GLA with regards to Part A having a proportionate and pragmatic approach to considering the potentially limited opportunities provided by some of the LSIS in Harrow for intensification under Policy E7. Potential LSIS sites should not be excluded from such designation simply because they have limited potential for intensification (see comments on Policy E7 below).
E7: Intensification, co-location and substitution of land for industrial, logistics and services to support London's economic function	The Council supports the draft Plan proposals to retain industrial floor space within London / Harrow; this is supported by the Council's own evidence. The Council however has concerns about the practicalities and feasibility of seeking to achieve housing on industrial land by intensifying the use of industrial land in order to free some of it up for housing. These concerns are two-fold – namely the practicality of co-locating residential and industrial uses. In many instances, such an approach will result in relatively benign industrial uses (i.e. storage) being delivered in order to address reverse amenity impacts of introducing residential to the area. Residential development will most likely preclude B2 General industrial. Secondly, from a Harrow perspective, much of our industrial land is on small estates with relatively poor access to the strategic transport network, reducing the likelihood of industrial intensification being attractive to developers and able to be achieved to an acceptable design standard. There are also general concerns about the financial feasibility of new build industrial development within the borough, as our rental levels are relatively low as our sites do not meet contemporary needs (size, quality, format of provision and access to strategic transport networks).
E8: Sector growth opportunities and clusters	Harrow supports this policy and notes the recognition of the need to promote economic development clusters in Outer London. The Council support the need for incubation and accelerator space. However, there is also a need for Move On Space to enable businesses to grow. We would expect planning policies and obligations to • cap the length of time a business could occupy incubation space. (Incubation space should not be seen as cheap space). • ensure landlord provides details of SIC class of business tenants. • business support services are provided to tenants.

Chapter 6	Economy
London Plan Policy:	**Representations**
E9: Retail, markets and hot food takeaways	Retail and hospitality benefit from services that increase footfall. Other services that should be encouraged would be libraries, health centres, recreation, and arts activities. Harrow recognises the concern regarding A5 hot food takeaway uses and obesity. Paragraph (C) should be clarified with respect to the circumstances where a locally-determined boundary maybe justified (for example, where the location of hot food takeaway uses support the evening and night time economy).
E10: Visitor infrastructure	The Council supports this policy. The bulk of the visitor economy will centre on the CAZ, however it will also at points overlap with the Outer London boroughs, particularly where those boroughs host specialist or niche assets. The London Plan should ensure Outer London Boroughs also benefit from "A sufficient supply of serviced accommodation for business visitors should be maintained".
E11: Skills and opportunities for all	Harrow fully supports the Skills and Opportunities for All policy. If workless and unskilled Londoners are to benefit from the employment and training opportunities generated by construction then developers need to pay a contribution towards the local implementation of job brokerage and training provision. This will include local schemes that deliver community outreach, provide careers advice and action planning, arrange training, work placements and employment for jobseekers and provide pastoral support to help clients stay in work. Apprenticeships are essential to developing a skilled workforce, however it is also essential to provide upskilling opportunities in a number of short focused industry recognized training courses

Chapter 7	Heritage and Culture
London Plan Policy:	**Representations**
HC1: Heritage Conservation & Growth	Harrow supports this policy, recognising that there needs to be a balance between providing growth within the Borough, whilst preserving and enhancing heritage assets within the Borough.
HC2: World Heritage Sites	No Comment

Chapter 7	Heritage and Culture
London Plan Policy:	**Representations**
HC3:Strategic & Local Views	Harrow agrees that important local views require protection, and development within them must be dealt with sensitively (as outlined in Policy HC4 London View Management Framework). In identifying important local views within Local Plans and managing these (applying the principles of Policy HC4 London View Management Framework), boroughs should be given the flexibility to balance the significance of the views and the implication of these against other planning considerations, such as the suitability of an area for more intensive development / tall buildings.
HC4: London View Management Framework	The Policy is supported; as noted in response to Policy HC3 above, flexibility needs to be allowed with respect to balancing the implications of identifying important local views and protecting these with other planning considerations relevant to the view corridors.
HC5: Supporting London's culture and creative industries	The Policy is supported.
HC6: Supporting the night time economy	The Policy is supported.
HC7: Protecting public houses	The Policy is supported and provides further weight to existing local policy.

Chapter 8	Green Infrastructure and Natural Environment
London Plan Policy:	**Representations**
General	This chapter should better reflect and integrate with the Government's 25 Year Environmental Plan.
G1: Green infrastructure (B)	The Council supports this policy, however the Mayor should assist with identifying what and where green infrastructures strategies should be undertaken. G1(B) needs to be strengthened to specify that the strategies should be reflected in local policy and decision making on planning applications / biodiversity offsetting

Chapter 8	Green Infrastructure and Natural Environment
London Plan Policy:	**Representations**
	measures.
	The Council considers that the link between Green Infrastructure and Climate Change (mitigation and adaptation) needs to be better articulated within this policy.
	The draft policy focus on green infrastructure is arguably limiting and the Natural Capital Approach should be utilised as this goes beyond Green Infrastructure.
G2: London's Green Belt (A)(1)	Draft Policy G2 London's Green Belt, paragraph (A) (1) is considered to contradict the NPPF as reference to 'very special circumstances' in the context of 'harm' is not included in the policy. This is considered contrary to NPPF paragraph 88, which indicates: 'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations'. The draft policy essentially seeks to prevent Local Planning Authorities from weighing up whether very special circumstances exist for development that is inappropriate and therefore by definition, harmful (see NPPF paragraph 87: 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances'.
G2: London's Green Belt	The Council supports the protection of Green Belt Land where robust, up-to-date Green Belt studies identify land as continuing to serve Green Belt purposes (consistent with the NPPF). Policy G2(B) is however considered to be inconsistent with the NPPF, as the statement that 'de-designation of Green Belt is not supported' makes no reference to the NPPF requirement that Local Plans need to be justified by evidence and Green Belt boundaries should be capable of enduring beyond the plan period. This inconsistency places boroughs with Green Belt in a difficult position as the NPPF indicates one thing (establish / confirm Green Belt boundaries through an appropriate evidence base) whereas the draft London Plan just places a blanket ban of Green Belt de-designation with no evidence or policy basis for this.
G3: Metropolitan Open Land	The policy is supported.

Chapter 8	Green Infrastructure and Natural Environment
London Plan Policy:	**Representations**
G4: Local green and open space	The policy is supported.
	Types of Green Spaces should be identified, to increase the ability of providing an increase in biodiversity.
G5: Urban Greening	The Council generally supports this policy, and encourages the Greening of London, in an attempt to achieve the Mayors target of 50% green cover across the City.
	It is suggested that a stronger, more precise definition of High Quality Landscaping is required to assist in negotiating with planning applications.
	It is further suggested that the term 'Green Roof' is replaced with 'Living Roof' to provide Developers more options when addressing this issue.
	Table 8.2 is not user friendly as it is not clear as to how it works in terms of 'net' value added. It does not take in to consideration the 'baseline value of the site', rather just what is would add from a 'zero' point. The Council suggest that this policy utilise the DEFRA Metric.
	Para 8.5.3: it would be encouraged that the Mayor provides a London Wide Model, that can then be amended according to each Borough, but would ensure that trans-boundary issues are dealt with.
	The Plan should provide detail of how compensation would be sought and obtained.
G6: Biodiversity and access to nature (A)	The first and second lines appear to be contradictory with respect to the level of protection.
G6: (B)	The ordering of the matters addressed under 1 – 5, should be re-ordered in order of importance.
	The Council suggest that the Mayor provides clarity around a procedure for identifying matters such as Green Corridors, and a list of sites should be provided by the Mayor for consideration for SSSI Status.
G6: (C)	(C)(3) Policy should follow mitigation hierarchy so development should not go anywhere near such sites as a first principle, which would then avoid damage to any biodiversity and / or SINC.

Chapter 8	Green Infrastructure and Natural Environment
London Plan Policy:	**Representations**
	The Council considers that the draft Plan should greater clarity as to where impacts cannot be avoided, the how this would be compensated.
G6: (E)	Proposals which create new or improved habitats that result in positive *net* gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites *where appropriate for the site*.
G7: Trees and woodlands	The Council supports the retention of trees and woodlands. It is considered that the statement in relation to Category A and B trees is too general and should provide more detail as to the circumstances where removal of Category A and B trees maybe acceptable (including mitigation measures).
	The Council would encourage that this policy includes the retention of standing deadwood as a Biodiversity Value. Where it must be removed, it remains within the Woodland for Biodiversity gain.
G8: Food growing	The Council supports the policy to provide Food Growing within developments. However, the success of these is reliant on the future occupiers of the development. As such, any proposal for this, whilst supported, must be supported with a Management and Maintenance Plan to ensure its on-going success.
G9: Geodiversity	Statement under (A) (1) should also be included under G6.

Chapter 9	Sustainable Infrastructure
London Plan Policy:	**Representations**
SI1: Improving air quality	The Council supports this policy.
	Further guidance is required with respect to what constitutes Air Quality Neutral and Air Quality Positive.

Chapter 9	Sustainable Infrastructure
London Plan Policy:	Representations
SI2: Minimising greenhouse gas emissions	The Council supports this policy and welcomes the articulation of energy efficiency targets within the policy.

It is considered that the policy could be strengthened by removing references to 'should' in paragraphs (A), (B) and (C) ('any shortfall should be provided: as zero-carbon will always be achievable by making an offset payment [(A) and (C)] and a detailed energy strategy must be submitted otherwise Local Planning Authorities will not be able to assess the application against the London Plan requirements [paragraph (B)].

The Policy could also be further strengthened by requiring post-construction evidence of the performance of the building with respect to carbon emissions, to ensure on-site reductions are achieve as per the design stage / planning application, or to ensure the offset contribution reflects actual emissions. Harrow's experience is that energy strategies typically overstate proposed thermal performance and buildings are built to a poor quality that results in less air-tight / thermally efficient buildings. |
| 9.2.1 | It is unclear how Policy SI2 will apply to refurbishments in practice, as it is unclear what constitutes 'major refurbishment'. Additionally, the paragraph suggests the development involving major refurbishment should aim to meet the requirements of Policy SI2; in practice all development can achieve zero-carbon by making carbon-offsetting contributions to offset the development's emissions. |
| SI3: Energy infrastructure | The Council supports this policy.

Figure 9.3 (Heat Network Priority Areas) needs to be updated to reflect more recent heat network investigations in Harrow. |
| SI4: Managing heat risk | The Council supports this policy. |
| SI5: Water infrastructure | The Council supports this policy. |

Chapter 9	Sustainable Infrastructure
London Plan Policy:	**Representations**
SI6: Digital connectively infrastructure	The Council supports this policy.
	The policy however should be linked to Good Design Policy (D2) and Heritage Conservation and Growth (HC1) as some ancillary structures can be unsightly, and also erode the good design quality of developments/public realm.
SI7: Reducing waste and supporting the circular economy	The Council supports this policy but notes that greater emphasis on the reduction of non-recyclable materials could be given to assist in waste reduction, and specifically single use plastics. This should be added in and linked into Policy D7M (Public Realm) and support paragraph 3.7.11. Additionally, the use of materials that are of a high quality, allowing a longer life span, and higher frequency of recycling could also be further promoted.
SI8: Waste capacity and net waste self-efficiency	The Council supports this policy.
SI9: Safeguarded waste sites	The Council supports this policy.
	It is unclear why the policy requires waste plans to be adopted before considering the loss of waste sites, as waste sites are those with planning permission for waste use or a permit from the Environment Agency for waste use and their loss is only acceptable where appropriate compensatory capacity is made within London, such a process of compensation can occur outside the plan making process. The first sentence of (C) should therefore be deleted.
	Consistent with other elements of the draft Plan (mixed / intensified use), this policy should be clear as to whether the existing waste sites can be intensified in such a way that the waste capacity is maintained or exceeded on a smaller area, thereby freeing up land for other, appropriate uses.
SI10: Aggregates	The Council supports this policy.
SI1: Hydraulic fracturing (Fracking)	The Council supports this policy.

Chapter 9	Sustainable Infrastructure
London Plan Policy:	Representations
SI12: Flood risk management	The Council supports this policy.
SI13: Sustainable drainage	The Council supports this policy. Policy should link to other policies where these present opportunities for sustainable drainage i.e. Policy G7 Trees and woodlands and Policy D7 Public Realm.
SI14: Waterways – strategic role	The Council supports this policy.
SI15: Water transport	The Council supports this policy.
SI16: Waterways – use and enjoyment	The Council supports this policy.
SI17: Protecting London's waterways	The Council supports this policy.

Chapter 10	Transport
London Plan Policy	Representations
General	The Council agrees with the Mayor that there needs to be a model shift away from the private motor vehicle, to more sustainable modes of transport. However, Harrow is concerned that there is a significant disconnect between inner and outer London Boroughs with respect to access to more sustainable forms of transport. Whilst it is encouraging to see a number of policies make a distinction between inner and outer London Boroughs, there is still concern that the requirements set by policy for Outer London do not necessarily reflect the concerns and matters prevalent in these areas.

Chapter 10	Transport
London Plan Policy	Representations
	Secondly, with regard to the percentage shift, being from 65% to 80% is difficult to achieve in reality, whereby public will make the change to a reliable, sustainable, and affordable mode of transport.
	Significant additional investment is required in sustainable transport infrastructure in Outer London (i.e. public transport, cycling) to ensure Outer London is able to achieve a substantial modal shift in order to contribute to the overall modal shift targets for London.
T1: Strategic approach to transport	The Council agrees with a modal shift to more sustainable transport modes. However, there is not enough sustainable, reliable or affordable public transport provision to enable this shift within Harrow. Specifically, there is not satisfactory orbital connectivity between and within the outer London Boroughs, which does not assist in sustainable mode of transport for labour/tourism across Borough boundaries.
	The approach to small sites will focus a significant proportion of new housing within Outer London into areas with poor access to sustainable transport nodes and for which the Mayor has few tangible infrastructure projects identified to address these.
T2: Healthy Streets	The Council agrees with the Ten Healthy Streets Indicators/Principles.
T3: Transport capacity, connectivity and safeguarding	The Council supports the overall intent of this policy.
	However, paragraph 10.3.2 should be amended to mention the need to provide better orbital routes that would negate the need to travel into central London only to travel back out again. This would assist in reducing capacity pressure on the central stations (both rail and underground).
	The Council considers that Table 10.1 outlining proposed transport infrastructure is too general to provide any confidence that an adequate public transport and walking / cycling network will be provided during the life of the Plan to support the growth envisaged, particularly from small sites scattered throughout Outer London. This is particularly the case with respect to orbital connections within and across boroughs to connect people to services / town centres / transport nodes / employment opportunities.

Chapter 10	Transport
London Plan Policy	**Representations**
T4: Assessing and mitigating transport impacts	The Council supports the policy. The Mayor and its partners, specifically TfL need to be more forthcoming with data to developers, which assists in determining what impact developments would have on the existing network. Currently, developers, and Local Authorities rely on PTAL/number of bus/train stops/services, rather than actual detail on frequency and capacity of the services on those routes. Applications need to be able to detail if nearby public transport is fit for purpose, capacity, frequency and destination to suit future users needs.
T5: Cycling	The Council agrees with ensuring adequate facilities for cycle storage for future developments. However, the Council is concerned with the amount of cycle storage required by developments, specifically the increase in provision from 1 to 1.5 spaces for one bed units. Current evidence details that cycle usage within Harrow is extremely low (1% of journeys), partially attributed to the lack of safe and satisfactory infrastructure – linked to the funding availability to provide for this. Currently, developments often result in large expanses of cycle provision being underutilised, either resulting in large ancillary structures across the development site, or large internal areas of buildings underutilised. This is an inefficient use of some sites, which may either result in impacts on design, housing provision, or viability. The Council would encourage the Mayor to provide clarity on providing pooled cycle parking schemes off-site.
T6: Car parking **(including T6.1-T6.4)**	The Council welcomes the draft Policy's differential parking rates for Inner and Outer London, which recognises the differences between these two areas with respect to issues such as car ownership rates and accessibility to sustainable transport options. The Council however considers that there should be greater scope for car parking rates and their application to be set locally within Local Plans, as the policy currently sets maximum car parking levels which boroughs cannot exceed in setting any levels locally. Rather than wholesale numerical maximum figure on parking numbers, local evidence based data could be utilised to provide some local flexibility in parking numbers whilst promoting and facilitating the Mayor's overall aspirations for modal shift to more sustainable forms of transport. Furthermore, planning decisions must be made in relation to the site circumstances at the time, it not good planning practice to determine applications on permissions / earmarked developments / infrastructure improvements that may potentially never come forward.

Chapter 10	Transport
London Plan Policy	**Representations**
T6.1: Residential parking T6.1(C)	The Council would note that the proposed change to essentially provide for 80% passive low emissions vehicles spaces could be onerous on developers. The Council note that there are other methods that could be employed to achieve a reduction in pollution.
T6.3 Retail Parking	The Council is concerned that there is insufficient parking provision for commuters from outside of the Borough, especially outside of London travelling in, where there is not a satisfactory public transport alternative.
T6.5: Non-residential disabled persons parking	The Council supports this policy.
T7: Freight and Servicing	The Council supports this policy.
T8: Aviation	The Council notes the Mayor's opposition to the expansion of Heathrow Airport on the basis of additional noise and air quality harm and the need to ensure the benefits of future regulatory and technology improvements are fairly shared with affected communities. Harrow Council supports the expansion of Heathrow Airport and the significant economic benefits this would bring to West London and the broader UK economy. The Council considers that the Mayor needs to work more proactively with the Airport, Government and other stakeholders in addressing potential noise and air quality implications of expanding Heathrow Airport, including utilising the London Plan / infrastructure provision to do this. The Council also considers that the Mayor and the London Plan needs to be more proactive in spreading the economic benefit of Heathrow Airport, particularly to those communities where there are negative noise and air quality impacts. A key means of achieving this would be to improve orbital public transport connections in West London, in order to improve connectivity with the airport and economic activities surrounding it.

Chapter 10	Transport
London Plan Policy	Representations
T9: Funding transport infrastructure through planning	The Council supports this policy. Harrow would note that Outer London Borough's do not directly benefit Mayoral CIL, in terms of the improvements to public transport or other forms of sustainable transport infrastructure (improved cycle ways etc).

Chapter 11	Funding the London Plan
London Plan Policy	Representations
DF1: Delivery of the Plan and Planning Obligations	The Council supports this policy.

Chapter 12	Monitoring
London Plan Policy	Representations
M1: Monitoring	The Council supports this policy.