

If you would prefer to make a written representation, these can be emailed to:

Local.Plan@harrow.gov.uk

Alternatively, you can send your representation to: New Local Plan, Planning Policy Team,
London Borough of Harrow, Forward Drive, Harrow, HA3 8FL

Spatial strategy

Do you agree with the spatial strategy in terms of where development should be directed in the Borough?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know / unsure

Do you disagree with anything?

If you disagree with the spatial strategy or vision, please indicate which aspects you disagree with (please indicate all that apply)

- Most growth in opportunity area
- More modest growth in other centres
- Retention of suburban character
- Green belt, metropolitan open land and open space
- Retention of employment/industrial land
- Other (please specify)
- None of the above

Please provide any other comments below.(There will be more opportunities to comment on specific policies later on this page)

The intensification of new residential development should be spread across the whole of the borough and not just the Wards that are most deprived. These deprived Wards will have greater pressure on them if there is the intended level of proposed development, such as services, parking, and a lack of other required facilities. The number of targeted residential development should be spread across the whole borough, including the more affluent areas, such as Pinner Stanmore and Hatch End. Why are these areas not targeted? The Council already appears to not be able to meet its affordable housing targets in the regeneration programme, so the low rise development that they will need to deliver in these more affluent Wards, should not be an issue. The planning policy considerations, such as conservation areas will drive greater quality housing, rather than high-rise developments, which the Harrow Conservative Administration said that they were against as part of their manifesto! Did they mean they were just against delivering them the more affluent areas and protecting those suburbs? There are protected characteristic groups in the proposed Opportunity Area - Marlborough, Greenhill and Wealdstone Wards that will be substantially impacted by the number on new proposed development, including race groups and faith groups. The poorer Wards are proposed to be crammed with new development, the heights, massing and number of developments in the opportunity areas can be significantly reduced if the whole borough shares the targets, the impact will therefore be less targeted and less felt in one area. There is then the opportunity to ensure a balanced development, taking into account travel movement, parking, amenities and other services. This wider borough approach will also ensure that the protected characteristic groups in the more deprived Wards can have chances of greater social inclusion, less social pressures, more education, health and wellbeing attainment, rather than being further discriminated and thereby further excluded with more housing and less ratio of services. The Council is requested to treat all communities fairly and spread the impact of the development and thereby deliver greater outcomes for residents in Marlborough Greenhill and Wealdstone. We don't just require buildings; we require social regeneration.

Planning policy arguments against a proposed Local Plan that focuses intensification only in an opportunity area, that could lead to further neglect in deprived wards in the area, whilst protecting and enhancing more affluent suburbs elsewhere in the borough, could lead to:

1. **Social Inequality:** Concentrating intensification and development only in opportunity areas that are more deprived perpetuates social inequality. It further marginalizes already disadvantaged communities by denying them access to the required level of infrastructure and community amenities.
2. **Infrastructure Imbalance:** Focusing development in one area while neglecting others can create imbalances in infrastructure provision. Deprived wards may already lack essential infrastructure and services, such as schools, healthcare facilities, and public transportation. Intensifying development without addressing these deficiencies could strain existing infrastructure and worsen living conditions for residents.

3. **Spatial Injustice:** Planning policies should aim for spatial justice, ensuring equitable distribution of new housing target across all areas of the borough. Neglecting deprived wards by targeting development in them in favour of protecting suburban areas reinforces spatial injustices and undermines efforts to create inclusive, sustainable communities where all residents can thrive.

4. **Environmental Justice:** Intensifying development only in opportunity areas may exacerbate environmental injustices. Deprived wards often bear a disproportionate burden of environmental pollution and lack green spaces compared to suburban areas. Neglecting these wards in planning decisions perpetuates environmental inequalities and denies residents access to a healthy living environment.

5. **Community Integration and Cohesion:** Integrating development targets across the borough promotes community integration and cohesion. Rather than concentrating growth in specific areas, spreading development across diverse neighborhoods fosters interaction and social exchange between residents from different socio-economic backgrounds, enhancing community resilience and reducing social segregation.

6. **Maximizing Land Use Efficiency:** Utilizing land resources efficiently requires considering development opportunities across the entire borough. Neglecting development in suburban areas may result in underutilized land and missed opportunities for sustainable growth and regeneration. By sharing development targets, planners can optimize land use and promote compact, mixed-use development patterns that minimize sprawl and support sustainable transportation options.

Addressing these arguments requires a holistic approach to planning that prioritizes social equity, community empowerment, and sustainable development across all areas of the borough, rather than concentrating new build targets in select opportunity areas to the detriment of already deprived wards.

Overall approach

Do you agree with the overall approach to high quality growth?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know / unsure

Tall buildings

Do you agree with the approach to tall buildings within the Harrow & Wealdstone Opportunity Area, which will need to deliver a significant proportion of the Borough's housing and commercial requirements?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know / neutral

Please provide any other comments on high quality growth below.

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impact will therefore be less targeted and less felt in one area. There is then the opportunity to ensure a balanced development, taking into account travel movement, parking, amenities and other services. This wider borough approach will also ensure that the protected characteristic groups in the more deprived Wards can have chances of greater social inclusion, less social pressures, more education, health and wellbeing attainment, rather than being further discriminated and thereby further excluded with more housing and less ratio of services. The Council is requested to treat all communities fairly and spread the impact of the development and thereby deliver greater outcomes for residents in Marlborough Greenhill and Wealdstone. We don't just require buildings; we require social regeneration.

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- 1. Social Inequality:** Concentrating intensification and development only in opportunity areas that are more deprived perpetuates social inequality. It further marginalizes already disadvantaged communities by denying them access to the required level of infrastructure and community amenities.
- 2. Infrastructure Imbalance:** Focusing development in one area while neglecting others can create imbalances in infrastructure provision. Deprived wards may already lack essential infrastructure and services, such as schools, healthcare facilities, and public transportation. Intensifying development without addressing these deficiencies could strain existing infrastructure and worsen living conditions for residents.
- 3. Spatial Injustice:** Planning policies should aim for spatial justice, ensuring equitable distribution of new housing target across all areas of the borough. Neglecting deprived wards by targeting development in them in favour of protecting suburban areas reinforces spatial injustices and undermines efforts to create inclusive, sustainable communities where all residents can thrive.
- 4. Environmental Justice:** Intensifying development only in opportunity areas may exacerbate environmental injustices. Deprived wards often bear a disproportionate burden of environmental pollution and lack green spaces compared to suburban areas. Neglecting these wards in planning decisions perpetuates environmental inequalities and denies residents access to a healthy living environment.
- 5. Community Integration and Cohesion:** Integrating development targets across the borough promotes community integration and cohesion. Rather than concentrating growth in specific areas, spreading development across diverse neighborhoods fosters interaction and social exchange between residents from different socio-economic backgrounds, enhancing community resilience and reducing social segregation.
- 6. Maximizing Land Use Efficiency:** Utilizing land resources efficiently requires considering development opportunities across the entire borough. Neglecting development in

suburban areas may result in underutilized land and missed opportunities for sustainable growth and regeneration. By sharing development targets, planners can optimize land use and promote compact, mixed-use development patterns that minimize sprawl and support sustainable transportation options.

Addressing these arguments requires a holistic approach to planning that prioritizes social equity, community empowerment, and sustainable development across all areas of the borough, rather than concentrating new build targets in select opportunity areas to the detriment of already deprived wards

Overall approach

Do you agree with the approach to heritage in terms of how development proposals should preserve or enhance the significance of heritage assets in Harrow and allow responses to climate change without compromising heritage significance?

(Note this question only relates to heritage. There are more policies about climate change in a later section of the Plan which are highlighted later on this page)

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know / unsure

Other comments

Please add any other comments on heritage below.

Protecting heritage is valuable but in delivering and protecting the characteristics of those areas, other Wards and their communities, including those with protected characteristics should not be excluded and discriminated. The character in those deprived areas should also have a vision of enhancing and not adding further detriment by increasing the number of residential development without the required level of facilities.

Approach to housing

Do you agree that the approach to accommodating 16,000 new homes in Harrow by 2041 is the correct one in terms of meeting housing needs in the area?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know / unsure

Support for housing policies

If you do not agree with the proposed housing policies, please indicate which policies you disagree with (please indicate all that apply)

- The overall scale of housing development
- Providing the greatest concentration of new homes in the Opportunity Area
- Seeking to increase the supply of family-sized homes
- Aiming for 50% of new housing to be affordable
- Placing more controls around the conversion of family sized homes
- Other (please specify)
- None of the above

Other comments

Please provide any other comments on the housing policies

The intensification of new residential development should be spread across the whole of the borough and not just the Wards that are most deprived. These deprived Wards will have greater pressure on them if there is the intended level of proposed development, such as services, parking, and a lack of other required facilities. The number of targeted residential development should be spread across the whole borough, including the more affluent areas, such as Pinner Stanmore and Hatch End. Why are these areas not targeted? The Council already appears to not be able to meet its affordable housing targets in the regeneration programme, so the low rise development that they will need to deliver in these more affluent Wards, should not be an issue. The planning policy considerations, such as conservation areas will drive greater quality housing, rather than high-rise developments, which the Harrow Conservative Administration said that they were against as part of their manifesto! Did they mean they were just against delivering them the more affluent areas and protecting those suburbs? There are protected characteristic groups in the proposed Opportunity Area - Marlborough, Greenhill and Wealdstone Wards that will be substantially impacted by the number on new proposed development, including race groups and faith groups. The poorer Wards are proposed to be crammed with new development, the heights, massing and number of developments in the opportunity areas can be significantly reduced if the whole borough shares the targets, the impact will therefore be less targeted and less felt in one area. There is then the opportunity to ensure a balanced development, taking into account travel movement, parking, amenities and other services. This wider borough approach will also ensure that the protected characteristic groups in the more deprived Wards can have chances of greater social inclusion, less social pressures, more education, health and wellbeing attainment, rather than being further discriminated and thereby further excluded with more housing and less ratio of services. The Council is requested to treat all communities fairly and spread the impact of the development and thereby deliver greater outcomes for residents in Marlborough Greenhill and Wealdstone. We don't just require buildings; we require social regeneration.

Overall approach

Do you agree with the policy approach to managing land for Harrow's local economy, including planning for industrial, retail, business and office space?

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

Don't know / unsure

Protecting employment space

Would you support Council taking stronger action to protect local retail, business and office space from conversion to residential use?

- Yes
- Neutral
- No
- Don't know / Unsure

Other comments

Please provide any other comments on planning policies for Harrow's local economy

The economy should be protected to ensure greater local jobs for local people. Local businesses should also be supported to compete with Watford and so we don't lose customers to other centres, including Westfield. The Council should also recognise that parking spaces are key for businesses and should protect and increase them. Space for prayer, such as prayer rooms should also be provided in the Shopping Centres – Westfield is an example.

Overall approach

Do you agree with the approach taken to social and community infrastructure (i.e. education, health, cultural, recreation and sports, emergency services)?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know / unsure

Other comments

Please provide any other comments on social and community infrastructure below

Whilst the approach is a start, there needs to be a lot more focus and interventions. The Council should also recognise that there are protected characteristic groups, such as faith and race groups, and their needs should also be taken into account, including their social, spiritual and religious needs. These all go hand in hand, as places of worship are social hubs for health and wellbeing purposes, including physical, economic, social and educational.

A space is also needed for future Muslim population for burials.

Overall approach

Do you agree with the overall strategy to protect and enhance green and open spaces, improve biodiversity and encourage opportunities for food growing?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know / unsure

Biodiversity

Do you agree with the proposal to seek a greater level of biodiversity improvement (20%) from new development, compared to the minimum (10%) required by legislation?

- Yes
- Neutral
- No
- Don't know / unsure

Other comments

Please provide any other comments about green infrastructure below

The 'Green Focus' should not be exclusively for the richer and more affluent areas! There is no target for the opportunity area, despite that being proposed for all of the Council's housing development targets! This is discrimination against the more deprived Wards! It seems that this Local Plan is highly unbalanced in social equity- the poorer areas proposed to have more residential development and less amenities that should go with it, such as parking and the like, whilst the more affluent areas have the nicer parts of the plan, such as the green focus! The latter is important for social, wellbeing and health purposes! Why are Marlborough, Wealdstone and Greenhill Wards being discriminated and excluded? Especially when there is more deprivation in those areas, according to the Index of Multiple Deprivation and protected characteristics groups that will be greater impacted, such as race, religious, marriage and pregnancy groups.

Climate and Nature Emergency Approach

Do you agree with the policies responding to the Climate and Nature Emergency?

Agree

Neutral

Disagree - stronger action required

Disagree - don't support action which goes beyond London Plan policy (note the new Local Plan must be in conformity with the London Plan)

Other comments

Please provide any other comments on policies relating to the climate and nature emergency below

Further support should be provided to local groups to deliver Climate and Nature Emergency.

Overall approach

Do you support these policies on waste and the circular economy?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know / unsure

Other comments

Please provide any other comments on planning for waste and the circular economy below

Further support should be provided to local groups to deliver Waste and Circular Economy.

Overall approach

Do you agree with the overall strategy to foster more sustainable transport modes and travel networks in relation to public transport (buses, trains) and active transport (walking, cycling) in Harrow?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Unsure / don't know

Please provide any other comments on transport and movement policies below

The proposed development in the Opportunity Area is substantial and without the required level of parking! Why are the more deprived Wards targeted? In the Stanmore Place development, there were low rise town houses with Parking provided and considered. Marlborough, Wealdstone and Greenhill should have the same standards. It is unfair to discriminate against the protected characteristic groups of faith and race. Furthermore, the Poets Corner development is proposed to be intensified with development without parking. The needs of the large Harrow Central Mosque, a landmark building of high usage of approximately 12,000 visitors per week (based on a normal week's activities and outside of the busier month of Ramadan), adjacent to the site, and the Muslim community using it have not been taken into account. The Civic Centre site is used for parking making the Mosque and community hub accessible. Redeveloping the site and not providing any parking space will have a detrimental and substantial impact on the Mosque, its worshipers and community, affecting these protected characteristic groups of faith and race. Parking should be provided for the Mosque and the new residents. This can be achieved by reducing the number of the proposed development flats and building those through the borough, rather than targeting all of the detrimental impact in Marlborough and its community. Harrow Council should work with existing community groups and find tangible solutions that address their needs, consider and allow for their future needs, and that does not further exclude and discriminate against them.

The following are several policy arguments for car park provision according to London Plan:

- 1. Accessibility and Mobility:** Car parks provide convenient access for residents, visitors, and businesses, enhancing mobility within London. They ensure people can travel easily and access essential services and amenities.
- 2. Supporting Economic Activity:** Car parks support economic activity by providing parking for employees, customers, and clients of businesses. They facilitate commerce by ensuring convenient access to shops, restaurants, and other commercial establishments.
- 3. Balancing Transportation Modes:** While promoting sustainable transport modes like walking, cycling, and public transit, car parks help maintain a balance by accommodating private vehicles. This balance is crucial for meeting the diverse transportation needs of Londoners.
- 4. Reducing Congestion and Pollution:** Adequate provision of car parking helps reduce on-street parking demand, which can lead to reduced congestion and air pollution. By providing designated parking spaces, car parks help manage traffic flow more efficiently.
- 5. Supporting Housing and Development:** Car parking provision is often a requirement for new developments, as it supports the housing sector by providing essential parking spaces for residents. It ensures that new developments are sustainable and meet the needs of future occupants.
- 6. Visitor and Tourist Accommodation:** Car parks cater to the needs of visitors and tourists who may rely on private vehicles for transportation. Adequate provision of parking facilities ensures a positive experience for visitors and supports the tourism industry in London.

These arguments emphasize the importance of strategic car park provision within the broader framework of sustainable urban development and transportation planning in London.

According to the London Plan, faith-based communities and places of worship should have car parking provision for several reasons:

- 1. Accessibility for Worshipers:** Car parking provision ensures that worshipers, especially those with mobility limitations or coming from distant areas, can access the place of worship conveniently. This inclusivity supports the principle of providing equal access to religious services for all members of the community.
- 2. Community Engagement:** Places of worship often serve as community hubs, hosting various events, gatherings, and activities. Adequate car parking facilitates community engagement by enabling people to attend these events without facing parking challenges, encouraging participation and fostering social cohesion.

- 3. Safety and Security:** Providing designated parking spaces enhances the safety and security of worshipers and their vehicles. It reduces the likelihood of illegal parking on nearby streets, which can obstruct traffic flow and create safety hazards, especially during religious gatherings or events.
- 4. Respect for Surrounding Neighborhoods:** By providing sufficient parking on-site, faith-based communities can minimize the impact of parking overflow onto neighboring streets. This demonstrates respect for the surrounding residential areas and helps maintain harmonious relations with the local community.
- 5. Promotion of Sustainable Transportation:** While car parking provision is important, places of worship can also promote sustainable transportation options such as walking, cycling, and public transit. However, for those who rely on private vehicles due to distance or other reasons, having parking facilities encourages responsible car use.
- 6. Support for Religious Freedom:** Adequate car parking provision supports the exercise of religious freedom by ensuring that individuals can attend religious services and activities without facing barriers related to transportation and parking availability.

Overall, these reasons underscore the importance of car parking provision for faith-based communities and places of worship in fostering accessibility, community engagement, safety, and respect for surrounding neighborhoods within the framework of the London Plan's objectives.

From a protected characteristic Equality, Diversity, and Inclusion (EDI) group perspective, additional arguments supporting car parking provision for religious communities, in line with the London Plan, include:

- 1. Accessibility for Disabled Individuals:** Adequate car parking provision ensures accessibility for disabled individuals within religious communities. Many members of EDI groups, such as people with mobility impairments or chronic health conditions, may rely on private vehicles for transportation. Having accessible parking spaces close to the place of worship facilitates their participation in religious activities and promotes inclusivity.
- 2. Cultural and Linguistic Diversity:** Some members of religious communities belonging to EDI groups may come from diverse cultural or linguistic backgrounds. Providing car parking facilities accommodates the needs of these individuals who may not be familiar with or have limited access to alternative transportation options. It ensures that they can participate fully in religious services and events without facing barriers related to transportation.
- 3. Family Support and Childcare Responsibilities:** Members of religious communities from EDI groups, particularly women and caregivers, may have family support and childcare responsibilities that necessitate the use of private vehicles. Car parking provision near places of

worship enables these individuals to attend religious activities while fulfilling their caregiving duties, promoting gender equality and family inclusivity within the community.

4. **Economic Disadvantage and Financial Constraints:** Some members of EDI groups within religious communities may experience economic disadvantage or financial constraints, limiting their access to alternative transportation options. Providing affordable or free car parking facilities helps alleviate the financial burden associated with attending religious services, ensuring that individuals from diverse socioeconomic backgrounds can participate without discrimination or exclusion.
5. **Protection Against Discriminatory Practices:** In some cases, members of religious communities belonging to EDI groups may face discrimination or harassment when accessing public transportation or parking in public spaces. Providing secure and well-lit car parking facilities within the premises of the place of worship offers protection against such discriminatory practices and enhances the safety and security of individuals from marginalized communities.

By considering the unique needs and challenges faced by members of EDI groups within religious communities, these arguments highlight the importance of car parking provision as a means of promoting equality, diversity, and inclusion within the framework of the London Plan's objectives.

The National Planning Policy Framework (NPPF) also provides several arguments that can support car park provision for faith-based communities:

1. **Inclusivity and Accessibility:** The NPPF emphasizes the importance of creating inclusive communities where everyone has access to essential services and facilities. Providing car parking facilities for faith-based communities ensures that individuals from diverse backgrounds, including those with mobility limitations or transportation barriers, can access religious services and activities.
2. **Supporting Cultural and Community Needs:** The NPPF recognizes the significance of supporting cultural and community activities within planning decisions. Car park provision for faith-based communities facilitates the practice of religious rituals, ceremonies, and gatherings, which contribute to the social and cultural fabric of local communities.
3. **Promoting Social Cohesion:** Car parking provision for faith-based communities can foster social cohesion by encouraging interaction and engagement among community members. Accessible parking facilities make it easier for individuals to attend religious events, fostering a sense of belonging and connection within the community.
4. **Respecting Religious Freedom:** The NPPF acknowledges the importance of respecting religious freedoms and ensuring that planning policies do not unduly restrict the exercise of religious practices. Providing adequate car parking for faith-based communities

supports individuals' rights to gather for worship and other religious activities without facing unnecessary barriers or restrictions.

5. **Enhancing Neighbourhood Harmony:** By accommodating the parking needs of faith-based communities within their premises, the NPPF can contribute to reducing potential conflicts with neighboring properties. Adequate car parking provision helps minimize on-street parking congestion and associated issues, promoting harmonious relationships between religious institutions and the surrounding community.

6. **Sustainable Transportation Considerations:** While supporting car parking provision, the NPPF also encourages the integration of sustainable transportation measures. Faith-based communities can complement car parking facilities with initiatives such as promoting public transit use, carpooling, and cycling, aligning with broader sustainability objectives outlined in the framework.

These arguments align with the principles of inclusivity, community support, social cohesion, and respect for religious freedoms emphasized in the NPPF, providing a rationale for car park provision for faith-based communities within the context of planning decisions.

Other comments

Please provide any other comments on any part of the Plan below

This Local Plan is poor is meeting the needs of the Harrow Muslim Community and has not taken the protected characteristics groups of this community into account, including race, faith, marriage and pregnancy. It has excluded these communities in less affluent areas, according to the Index of Multiple Deprivation, and seeks to further exclude them by packing in new residential development without the level of parking and amenities. It has targeted the more affluent areas by protecting and enhancing the green agenda. This is highly imbalanced and discriminatory. The impact of more housing should be shared across the whole borough! Parking facilities should be recognised in an outer London borough and should be adequately provided in Marlborough. Westfield has a car park! Brent Cross has a car park! The suburban areas in the more affluent areas have on street parking. Marlborough and Harrow Mosque should not be discriminated and the Council should work with the communities to find a solution that benefits the whole of the borough, and to ensure that the Local Plan does not just mean local benefit to the affluent areas.

Please complete your details:

Name:

Address:

Email Address:

Contact Number:

I confirm I am over 18 years of age: Yes _____ No _____

Protected Characteristic Group: I confirm I am a member of a Black Asian Minority Ethnic group: Yes _____ No _____

Protected Characteristic Group: Do you have a religion: Yes _____ No _____
If yes, please list it here:

Please email your completed responses to Harrow Council at Local.Plan@harrow.gov.uk
Please also copy Harrow Central Mosque into the email so we can note the number of responses submitted at planning@harrowmosque.org.uk