

Delegated Report - Application for Planning Permission			
Case Officer:	Kimry Schlacter	Valid Date:	26/06/2025
Officer Recommendation:	Objections	Expiry Date:	24/07/2025
Application Number:	PL/1655/25	Recommended Date:	24/07/2025
Address:	Land East of Oxhey Lane, Oxhey Lane Carpenders Park		
Proposal:	Consultation from neighbouring authority Three Rivers District Council: Ref 25/1020/OUT for Outline planning application for up to 256 homes (C3 use class) (including affordable and self/custom build housing), housing with care (C2 use class), a children's home (for looked after children) (C2 use class) together with associated access (including off-site highway works), parking, open space and landscaping (appearance, layout, landscaping and scale as reserved matters).		

PLANNING CONSTRAINTS

Constraints:		
	YES/NO	NOTES
Conservation Area	No	Sited approximately approx. 860m distant, along with a historic park/garden area
Tree Preservation Order	No	TPO woodland approx. 770m distant
Listed Building	No	
Locally Listed Building	No	
Green Belt	Yes	Land within Harrow boundaries adjacent is also Green Belt.
Metropolitan Open Land	No	

Area of Special Character	No	Sited approximately approx. 560m distant
Town Centre	No	
Flood zone	No	Adjacent to site, small areas extending into and within Harrow boundaries
Scheduled Ancient Monument	No	Sited approximately approx. 860m distant
Archaeological Priority Area	No	
Council-Owned	No	
Critical Drainage Area	No	
Protected Views Setting Corridor	No	
RAF Northolt	Yes	Yellow (Consultation required for any any building, structure or works exceeding 45.7m in height above ground level); and black line (Consultation required for developments that involve flying activities)
Site of Importance for Nature Conservation (SINC)	No	Sited approximately approx. 580m distant

CONSULTATIONS

Statutory Consultees:		
<i>Consultee:</i>	<i>Date Consulted:</i>	<i>Summary of response:</i>
Planning Policy	07/08/2025	<p>The Planning Policy Team recommends that the Council raise a formal objection to this proposal due to the factors detailed below:</p> <ul style="list-style-type: none"> • The Policy Team considers that parcel SO3 makes a significant contribution to purpose b and not a moderate contribution as indicated by the Three Rivers Stage 2 Green Belt assessment. • The potential release/development of the application site will result in the expansion of intervening

		<p>settlement between the former towns, along the A4008 that connects into Harrow and will significantly harm the visual and physical separation between these. Further, the application site has a sloping topography, which means development will have an adverse impact on the visual openness of the Green Belt across a wider area, including from areas within Harrow. Overall, it is considered the potential development of this site will have a significant impact on the contribution on purpose b, as it would result in physical or visual coalescence of towns and result in a reduced physical gap between them.</p> <ul style="list-style-type: none"> • Therefore, the Planning policy team do not consider that the application site meets the definition of Grey Belt included within the NPPF (2024), as it is considered the site strongly contributes the Green Belt purposes a, b of the NPPF. • It is considered the proposed residential development on the application site would constitute inappropriate development that will be harmful to the Green Belt and that para 153 of the NPPF should apply for determining this. In line with this, the applicant would need to demonstrate very special circumstances for it to be permitted and demonstrate that the very high harm to the Green Belt and other harms is clearly outweighed by other considerations. • Overall, the Policy team consider that the proposal should be regarded as inappropriate development and contrary to para 155 of the NPPF. This is due to factors such as the potential harm of this on the Green Belt purposes included within the NPPF and adverse impacts on the essential characteristics of the designation that are its openness and permanence.
<p>Harrow Transportation & Highways</p>	<p>22/07/2025</p>	<p>Parking</p> <ul style="list-style-type: none"> • Concern re: potential to generate overspill, creating an impact back onto the Harrow highway network. • Given the flow levels and the type of highway network immediately surrounding the development it is thought that the importance of containing overspill parking within the development is high. <p>Trip Generation</p> <ul style="list-style-type: none"> • The impact of the development's trip generation on Harrow's highway network will be minimal, given the proximity of the site from the boundary, and the barrier

the strategic highway network will provide to the dissipation of trips into Harrow.

- The transport assessment has considered over bust trip right for the development which max. mises 100 vehicles during the AM peak these are two-way flows.
- No information has been provided to show how the development will impact on the junction of Oxley Lane and Uxbridge Road.
- The level of trip generation by the proposed development should highlight toward a signalised access.
- With out traffic modelling for the junction of Oxley Land and Uxbridge Road a recommendation for approval cannot be supported.

Cycle parking/usage

- The development has cycle parking facilities provided. The transport assessment highlights a number of sustainable facilities which can be used by cyclists accessing the development there is also some mention of upgrades to the to these facilities and the implementation of new facilities. Cycle parking looks to be of a convenient nature with the majority of large residential units containing within the back garden within designated facilities.

Access

- The proposed access is not signalised and is of a give way nature there is good visibility in both directions.
- Given the flows associated with the access it is thought that there should be some level of signalised junction proposed in association with the future development.
- The bottom access which provides entry for emergency vehicles and pedestrians should show some level of Highway makeup to ensure them emergency vehicles will be able to traverse through the access an into the development without the risk of bogging or getting stuck.
- The current access arrangement and detail is not suitable for the scale of development proposed for the site.

Construction phase

- The proposed CMP/CEMP considered the impact of the construction phase of the development on the surrounding highway network.
- The document will need to mitigate the developments impact on the immediately surrounding highway

		<p>network (of Which LB Harrow are not the highway authority for) and further afield.</p> <ul style="list-style-type: none"> • It should be noted that the CMP (submitted with the application) should propose that no construction routes are on Harrow roads, with the majority of the routes keeping to the strategic highway network. • Relevant construction related vehicles also meet CLOCS safety standard, as such vulnerable highway users have a suitable level of protection from dangerous vehicles in place. <p>Recommendation</p> <p>Without detail relating to the access arrangements and traffic modeling for the Harrow strategic highway network, a recommendation for approval cannot be supported as no robust assessment of the developments impact on the Harrow highway network can be made.</p>
Drainage Authority	22/07/25	<p>The proposals would not be acceptable to us. However, we are not convinced it would impact Harrow in any way.</p> <p>Our detailed concerns:</p> <ul style="list-style-type: none"> • Firstly, CFS would be required for loss of floodplain. They claim that positive drainage will remove the risk (paragraph 4.10) but loss of floodplain should be restored. • Secondly, sw discharge level should be restricted to a greenfield run-off rate of 5 l/s/ha max with total discharge at 27 l/s not 45 l/s as proposed. • Thirdly, permeable paving should be used (even in clay) for all new hardstanding and laid on 250mm gravel layer minimum.
<p>Hatch End Councillors:</p> <ul style="list-style-type: none"> • Cllr Susan Hall • Cllr Mathew Goodwin-Freeman 	02/07/2025	<ul style="list-style-type: none"> • N/A

Summary Neighbour Notification:		
<i>Number of Objections</i>	<i>Number of Supports</i>	<i>Neutral</i>
N/A	N/A	N/A
<i>Summary of response: N/A</i>		

The Consultation Protocol agreed by the Association of London Borough Planning Officers agreed on 12 June 2008 sets out the requirements for notification by the determining Local Planning Authority. The Local Planning Authority (LPA) determining the application is responsible for notifying all those properties affected by the development and carrying out publicity in the locality. The Protocol outlines that if the determining LPA decides that properties in another London Borough are affected by the development and should be notified about it, the LPA are responsible for notification and publicity unless they agree alternative arrangements with a particular London Planning Authority.

RECENT RELEVANT HISTORY

Please see Three Rivers Council planning history records.

RELEVANT POLICIES

When considering an application for planning permission or permission in principle, section 70(2) of the Town and Country Planning Act 1990 (TCPA 1990) states that the decision-maker must have regard to the provisions of the Development Plan, so far as material to the application; whilst Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The NPPF 2023 states that its content is to be a material consideration in the determination of applications. Guidance from the document emphasises that due weight should be given to the adopted policies of the Development Plan according to their degree of consistency with the 'NPPF' (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given).

In this instance, the Development Plan comprises The London Plan 2021 [LP] and the Local Development Framework [LDF]. The LDF comprises The Harrow Core Strategy 2012 [CS], Harrow and Wealdstone Area Action Plan 2013 [AAP], the Development Management Policies Local Plan 2013 [DMP], the Site Allocations Local Plan [SALP] 2013 and Harrow Local Area Map 2013 [LAP]. The New Local Plan Proposed Submission (Regulation 19) Version (2021-2041) has now been through the required consultation stages and the LPA has considered all representations received. The New Local Plan Proposed Submission (Regulation 19) Version (2021-2041), along with all relevant supporting information, including representations received and any proposed modifications to the Plan, has been submitted to the Planning Inspectorate for Examination in Public. In general terms it is considered to have substantial weight in the determination of planning applications. Notwithstanding this, consideration of relevant New Local Plan Proposed Submission (Regulation 19) Version (2021-2041)

policies and weight given are set out within this report, having regard to paragraph 49 of the NPPF 2024.

PLANNING ASSESSMENT

Impact on the London Borough of Harrow and Green Belt Land

Planning Policy and Green Belt

Harrow Council objects to the development, on the grounds that the proposal is not considered to be acceptable with regard to, or comply with, the Green Belt provisions of the NPPF (2024). There are serious concerns regarding the harmful impact the development of this site will have on the openness and permanence of the Metropolitan Green Belt, as well as on the capacity of the existing infrastructure across the wider area, including within Harrow.

Site Location

The proposal is on a greenfield site in open countryside, consisting of farmland and is located outside of the built-up area of the settlement of Carpenters Park and within the existing strong Green Belt Boundary that is clearly defined by the A4008. Further, this site is located within a sensitive gap between the urban areas of Harrow, Bushey and Watford, , near the areas of Hatch End and Pinner., and therefore makes a major contribution to the characteristic's openness and permanence of the Metropolitan Green Belt (para 142 of the NPPF).

Impact on the Metropolitan Green Belt

The NPPF (2024) emphasises that the determination of applications within the Green Belt should ensure substantial weight is given to any harm to this designation, including to its openness. It notes that inappropriate development, is by definition, harmful to the Green Belt and should only be approved in very special circumstances, which will not exist unless the potential harm to the Green Belt/other harms are clearly outweighed by other considerations (Para 153).

The NPPF (para155) sets out the policy approach for determining whether development would be inappropriate within the Green Belt and introduces a new concept of Grey Belt. This paragraph notes that development of homes, commercial and other development would not be inappropriate within the Green Belt *if it "utilises grey belt and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan"*, as well as complies with all of the criterion included within this. The glossary of the NPPF (2024) defines Grey Belt Land as "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143".

We note the Three Rivers Stage 2 Green Belt Review (Part 2, page 349) was undertaken in 2019 and an update to this has been commissioned to ensure compliance with the NPPF (2024) and consider whether land would fall within the definition of Grey Belt, to inform their new Local Plan.

The Stage 2 Green Belt Review indicates the application site falls within Parcel SO3 South Oxhey. This assessed the contribution this parcel makes to the NPPF Green Belt purposes and the potential harm of release/new development of this, to this designation. The key findings of this are.

1. **Purpose (a): Check the unrestricted sprawl of large built-up areas.** This parcel makes a significant contribution against this purpose, as it *“lies on the edge of South Oxhey, which is contiguous with Greater London and forms part of the large built-up area. The A4008 and the landform provide strong distinction from the inset settlement edge and the parcel is open and uncontained therefore, development would constitute sprawl.”*
2. **Purpose (b) - Prevent neighbouring towns merging into one another.** This parcel makes a moderate contribution against this purpose as it *“lies in the gap between Bushey and Pinner however, this is a relatively large and robust gap limiting the role of the parcel in maintaining separation.”*
3. **Purpose (d) To preserve the setting and special character of historic towns.**

The Stage 2 Green Belt Review indicates the assessment of this purpose was not relevant, as it did not identify any historic towns that had a significant relationship with the Green Belt land and the historic aspects of a settlements setting.

4. **Overall harm to the Green Belt:** The potential release of this will result in very high harm to the Green Belt purposes, as it would have a *“significant impact on preventing urban sprawl (part a) as well as moderate impact on preventing the merging of settlements (Part b)”*. Further, it states it would result in a significantly weaker, less consistent Green Belt boundary than the A4008 by virtue of it representing an encroachment on the countryside (part c). The Green Belt study concluded that the parcel makes a significant contribution to purpose c, as it *“is undeveloped and uncontained, with strong distinction from the inset urban edge and a relationship with the wider countryside”*.

While we generally agree with the findings of the Three Rivers Stage 2 Green Belt assessment of the contribution parcel SO3 makes to the NPPF purposes for this designation, Harrow considers that this parcel makes a significant contribution to purpose b and not a moderate contribution as indicated by this assessment. Based on the methodology set out in this assessment, the key reasons are that the application site is located within open countryside, outside of the existing built-up area of Carpenter's Park and forms a fragile gap between Hatch End and Pinner within the urban area of Harrow, and Watford. The potential release/development of the application site will result in the expansion of the intervening settlement between the former towns, along the A4008 that connects into Harrow and will significantly harm the visual and physical separation between these. Further, the application site has a sloping topography, which means development will have an adverse impact on the visual openness of the Green Belt across a wider area, including from areas within Harrow. Overall, it is considered the potential development of this site will have a significant impact on the contribution on purpose b, as it would result in physical or visual coalescence of towns and result in a reduced physical gap between them.

Therefore, we consider that the application site does not meet the definition of Grey Belt included within the NPPF (2024), as it is considered the site strongly contributes the Green Belt purposes a, b of the NPPF.

For this reason, it is considered the proposed residential development on the application site would constitute inappropriate development that will be harmful to the Green Belt and that para 153 of the NPPF should apply for determining this. In line with this, the applicant would need to demonstrate very special circumstances for it to be permitted and demonstrate that the very high harm to the Green Belt and other harms is clearly outweighed by other considerations.

On a separate note, were Three Rivers Council to accept the applicants' view that their site is considered Grey Belt in line with the definition included within national policy, the balance of paragraph 155 of the NPPF (2024) will apply. In line with this, the proposal for residential and supporting uses on the application site would not be regarded as inappropriate development within the Green Belt, if the applicant can demonstrate compliance with the criteria a-d of this paragraph. The 'In principle' objections in relation to these are included below:

- a. **The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.**

As noted above, it is considered that the potential development of the subject site will fundamentally undermine the purposes (taken together) of the remaining Green Belt because the application site will reduce the visual and physical sensitive gap, along the A4008 between the urban areas of Harrow, Bushey and Watford. It is considered to make a strong contribution to checking unrestrained sprawl of larger built area, preventing the merger of towns and encroachment of the countryside, as well as will result in a weaker Green Belt boundary. Due to this, the Three Rivers Stage 2 Green Belt review indicated the release of this site will result in very high harm to this designation.

- b. **There is a demonstrable unmet need for the type of development proposed.**

This is a matter for Three Rivers Council to determine if the proposal meets this requirement.

- c. **The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.**

The above sections of the NPPF seek to ensure significant development is located within locations that sustainable or can be made sustainable, in order to reduce private vehicular use, congestion and promoting the use of sustainable modes of transport for accessing local services, facilities. There are concerns in relation to whether the proposal that is of a significant scale will comply with these NPPF requirements. The key reasons are it is located on the edge of Carpenter's Park that is categorised as a secondary centre that contains a limited range of facilities and services. This may result in the high reliance of private vehicular use for access day to day facilities, services. Further, it located off the A4008 and there are concerns whether this can be redesigned to be well linked/integrated to the existing built-up area of Carpenter's Park. Further, the topography of the A4008 that has steep slopes may pose challenges to create safe, sustainable transport links with Carpenters Park. Harrow's Highways Authority would also address this matter.

- d. **Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below**

In summary the golden rules for major housing development to include a sufficient level of affordable housing (. i.e. 15% higher than the highest existing affordable housing that is capped at 50% subject to viability), necessary improvement to local/national infrastructure, the provision of new/enhanced accessible green spaces.

The applicant planning statement indicates that the proposal will deliver 50% affordable housing (70% social rented housing and the remainder shared ownership) and new/enhanced green spaces. These are matters for Three Rivers Council to consider in detail.

In regard to ensuring the proposal is supported by new/enhanced infrastructure we note that the Three Rivers Draft Local Plan (Part 2) Reg 18 document (2021) indicates there is a need to identify a site to deliver a new secondary school to address the future pupil needs of Carpenders Park and surrounding areas. The applicant has not yet provided any evidence that this issue has been considered or will be addressed, in partnership with Hertfordshire County Council. Therefore, this application should be refused, until there is certainty in relation to the provision of a new secondary school or expansion of existing schools, either via the Local Plan or application process. Further, the applicant will need to demonstrate that the potential impacts of the development on the capacity of the existing infrastructure capacity within the wider areas such as Hatch End and Pinner have been adequately assessed and enhancements/new provisions (particularly public transport and highway, healthcare) are delivered (if necessary) to address additional needs and deliver sustainable development.

Conclusion

Overall, we consider that the proposal should be regarded as inappropriate development and contrary to para 155 of the NPPF. This is due to factors such as the potential harm of this on the Green Belt purposes included within the NPPF and adverse impacts on the essential characteristics of the designation that are its openness and permanence.

Conservation, Heritage and Trees

The proposal is considered sufficiently distance from the nearest Conservation Area in Harrow, as well as other heritage assets including the Scheduled Ancient Monument, and from the TPO woodland, to mitigate any impacts.

Drainage

Although the Harrow Drainage Authority comment the details of the proposed drainage strategy would not comply with Harrow's local drainage criteria, there does not appear to be any significant adverse drainage or flooding impacts upon Harrow Borough as a consequence of the proposal.

Highways and Traffic

Harrow's Highways Officer has provided a response to the proposed development which is set out in full in the table above, and which the Three Rivers District Council's attention is directed to. With regard to direct impacts on Harrow borough, the following in particular are highlighted:

- The need to contain overspill parking is a concern.
- No information has been provided to show how the development will impact on the junction of Oxley Lane and Uxbridge Road (which lies within Harrow boundaries). Without

traffic modelling for this junction, a recommendation for approval cannot be supported

- The proposed CMP/CEMP should consider not only impacts of the construction phase on the immediately surrounding highway network, but also further afield. We request that the CMP should propose that no construction routes are on Harrow roads, with the majority of the routes keeping to the strategic highway network, and should meet CLOCS safety standard.
- With out detail relating to the access arrangements and traffic modelling for the Harrow strategic highway network, a recommendation for approval cannot be supported as no robust assessment of the developments impact on the Harrow highway network can be made.

Harrow Council therefore objects to the proposed development on the basis of the insufficient information regarding highways impacts on Harrow borough road networks.

Biodiversity

It is noted that part of the adjacent area of Harrow immediate adjacent the shared boundary comprises a Site of Importance of Nature Conservation (SINC). Although no specific objections are raised with regard to biodiversity and impacts upon the SINC at this time, it is noted that such impacts can be far-ranging, and Harrow Council requests that these be considered as part of the assessment of the development.

Human Rights Act

The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report.

Equalities

In determining this planning application, the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010. For the purposes of this application there are no adverse equalities issues.

S17 Crime and Disorder Act

Policy D11 of the London Plan (2021) and Policy DM1 of the Development Management Policies Local Plan require all new developments to have regard to safety and the measures to reduce crime in the design of development proposal. It is considered that the development does not adversely affect crime risk subject to conditions which are recommended.

CONCLUSIONS

Harrow Council objects to the proposal on the basis that the proposal should be regarded as inappropriate development and contrary to para 155 of the NPPF, and there would be harm on the Green Belt purposes included within the NPPF and adverse impacts on the essential characteristics of the designation that are its openness and permanence.

Furthermore, Harrow Council objects on the basis that there is insufficient information regarding highways impacts on Harrow borough road networks.

For the reasons considered above, and weighing up the Development Plan policies and proposals, and other material considerations, Harrow Council raises strong objections to the proposals set out in this application.

Delegation of decision

The objection is raised under powers delegated to the Director of Planning as the application falls within Category 12(a) and is not excluded by provisions A-G of the schedule of delegation dated 12th December 2019.

Officer Recommendation:	Object to loss of Green Belt land, inappropriate development of Green Belt, and potential impacts on Harrow's road networks
Authorising Officer Signature:	Nicola Rankin
Date:	1st October 2025