

# Appendix 20: Present Duty to Co-operate Actions with London Borough of Harrow



<b>17/10/2025 - Email from HBC</b>	Initial duty to co-operate email to LBH
<b>20/10/2025 - Email from LBH</b>	Response to initial email and confirmation of contact
<b>29/10/2025 - Email from HBC</b>	Initial invitation to Duty to Co-operate meeting
<b>01/11/2025 - Email from LBH</b>	Request for new meeting time
<b>03/11/2026 - Email from HBC</b>	Reschedule of meeting
<b>03/11/2026 - Email from HBC</b>	Reschedule of meeting
<b>03/11/2026 - Email from LBH</b>	Confirmation of meeting
<b>03/11/2026 - Email from HBC</b>	Meeting Link circulated
<b>13/11/2025 - Email from HBC</b>	Meeting Agenda

## **17\_11\_25 Hertsmere Duty to Co-operate meeting with London Boroughs of Barnet, Enfield and Harrow.**

### **Executive Summary**

The initial Duty to Co-operate meeting (17 November 2025) between Hertsmere Borough Council and neighbouring London authorities (Barnet, Enfield, Harrow) focused on introductions, local plan progress across the boroughs, and setting a foundation for ongoing strategic collaboration.

Hertsmere outlined its ambitious Local Plan timetable, emphasising the need for a sound and legally compliant plan, with substantial evidence-base work underway, including around 20–25 studies by AECOM and master planning work by AR Urbanism.

Neighbouring authorities provided updates on their Local Plan statuses—Barnet recently adopted; Enfield currently in examination with a potential new settlement; Harrow approaching adoption following main modifications consultation.

The group discussed cross-boundary strategic issues, including housing need, Green Belt, employment land (notably data centres and logistics), waste planning, and Gypsy & Traveller accommodation. Hertsmere confirmed its intent to meet its housing need in full and will not seek unmet need from London neighbours.

A key issue raised by Hertsmere was difficulty establishing a clear historic chronology of previous Duty to Co-operate engagement, and all authorities were asked to share any previous meeting notes, correspondence, or relevant historic material.

The meeting concluded with agreement to maintain regular engagement, with another joint meeting suggested at an appropriate milestone before the Regulation 18 consultation.

### **Attendees**

#### **Hertsmere Borough Council**

- Planning Strategy & Implementation Manager
- Planning Policy Lead
- Planning Policy Officer (Duty to Co-operate lead)

#### **London Borough of Barnet (LBB)**

- Principal Planning Officer
- Principal Planning Officer
- LBB representative during London Plan discussion

#### **London Borough of Enfield (LBE)**

- Strategic Planning Manager
- Principal Planning Officer

### **London Borough of Harrow (LBH)**

- Head of Planning Policy
- Planning Policy Team

### **Action Points**

#### **For Hertsmere**

- Compile a chronology of previous Duty to Co-operate engagement; request historic minutes, emails, and notes from partner authorities to fill gaps.
- Share emerging evidence base outputs (AECOM studies, masterplanning work, Green Belt review, landscape, SFRA etc.) as they become available.
- Reach out to the GLA regarding Green Belt and London Plan matters.
- Provide contact details of the officer responsible for the South Mimms data centre application to Enfield.
- Arrange next Duty to Co-operate meeting at a suitable milestone before Regulation 18.

#### **For Barnet, Enfield, Harrow**

- Submit any historic Duty to Co-operate materials (minutes, correspondence, records) to support Hertsmere in reconstructing its timeline.
- Stay engaged on technical **evidence** and await shared outputs for review.
- Enfield to follow up with Hertsmere for data centre officer contact.

#### **Joint / Cross-Boundary**

- Use the proposed “menu” of strategic topics (housing, Green Belt, employment land, waste, Gypsy & Traveller need, infrastructure) to shape future Statements of Common Ground.
- Continue to collaborate on shared strategic issues, including data centres and industrial land pressures.
- Maintain ongoing communication via email, with additional meetings arranged as needed.

<b>13/11/2026 - Email from LBH</b>	Additional Attendee requested to be added to agenda
<b>20/11/2025 - Email from HBC</b>	minutes from meeting and future meeting date proposed.
<b>21/11/2025 - Email from LBH</b>	Confirmation of attendance
<b>02/12/202 5 - Email from HBC</b>	Greenbelt notes for LBH comments.

## **Note for Hertsmere Neighbouring Authorities on settlement classification**

### **Harrow**

#### **Introduction**

On behalf of Hertsmere Borough Council, AECOM is undertaking a Green Belt Assessment (GBA) aimed at identifying grey belt, in line with the Green Belt PPG.

The aim of this note is to explain key aspects of the Hertsmere GBA methodology to allow neighbouring authorities to comment, and if relevant to enable suitable aligned methodologies. The key matter to discuss is the settlement classification.

#### **Settlement classification**

With regards to large built up areas (LBUAs), we are proposing three of relevance to the study area: Borehamwood, London, Watford. In each case the LBUA extends only as far as the Green Belt inset boundary.

With regards to distinguishing between towns and villages, we recognise that there is no accepted definition, and so there is a need to account for locally defined factors. The factors taken into account in our definition included:

- Population (based on Census data available at OA level)
- Settlement hierarchy
- Transport accessibility (including presence of a rail station and its level of connectivity, relationship to strategic and major road networks)
- Education facilities (including presence of primary and secondary schools)
- Wider facilities (including shops, healthcare, leisure, services, etc.)

As rules of thumb, we have been using approximately 5,000 as the population cut-off between a village and a town, and 75,000 as the population cut-off between a town and a LBUA. However, some judgement is required depending on the accessibility and services available in the settlement as per the points above.

With regards to historic towns, the previous study identified Watford, Bushey and Radlett. For the purposes of this study, it was found that the historic nature of these settlements was not significant due to lack of adjacency to the Green Belt, and the historic areas not being strongly associated with a landscape setting.

With regards to **Harrow**, we are currently intending to categorise London as a LBUA.

The settlement classification including settlements close to the Hertsmere border is as follows:

<b>Settlement type</b>	<b>Settlement</b>	<b>Relationship to LPA</b>
<b>LBUA</b>	Borehamwood	Wholly within
	Watford	Neighbouring authority (Watford)
	Greater London (including South Oxhey)	Neighbouring authorities (Barnet, Enfield, Harrow, Three Rivers)
<b>Town</b>	Potters Bar	Partly within
	Bushey	Wholly within
	Radlett	Wholly within
	London Colney	Neighbouring authority (St Albans)
<b>Village</b>	Shenley	Wholly within
	Elstree	Wholly within
	South Mimms	Wholly within
	Aldenham (including Wall Hall)	Wholly within
	Letchmore Heath	Wholly within
	Patchetts Green	Wholly within
	Ridge	Wholly within
	Brookmans Park	Neighbouring authority (Welwyn)
	Bricket Wood	Neighbouring authority (St Albans)

### **Question for Harrow Borough Council**

- Do you agree with the classification of the settlements within Harrow?

**11/12/2025 - Email from LBH**

Response from LBH to Greenbelt notes

Thanks for your note and apologies for the delayed response.

In terms of classifying Harrow as part of the London large built up area, I think that's fine – subject to noting the presence of Green Belt adjacent to the Hertsmere boundary.

Will the consultants be contacting us directly? I'd be interested to see the assessments for areas that border LBH.

As discussed on the call, also worth contacting the GLA regarding the London-wide Green Belt Assessment.

**22/12/2025 - Email from HBC**

Meeting link circulated

**19/01/2026 - Email from HBC**

Agenda for meeting on 20\_01\_26

## **20\_01\_26 Hertsmere Duty to Co-operate with London Boroughs (LBH, LBE, LBB)**

### **Executive Summary**

The Duty to Co-operate meeting between **Hertsmere Borough Council** and neighbouring London boroughs (Barnet, Enfield, Harrow) covered updates on local plan progress, evidence-base studies, cross-boundary issues, and shared challenges—including housing delivery, green belt assessment, viability, and HMOs.

Each authority provided an update on the status of their Local Plan. Hertsmere shared the initial findings from several key studies including the settlement hierarchy, retail, viability, local housing needs, Gypsy and Traveller needs, and the Green Belt review. Discussions highlighted significant housing pressures across the area, particularly regarding affordable housing delivery, social rent levels, and challenges with the management of HMOs.

London borough officers provided intelligence on Article 4 Directions, HMO management, and co-living proposals. The meeting concluded with next steps for Hertsmere's Regulation 18 consultation, expected in Spring 2026, and agreement to continue email correspondence for ongoing Duty to Co-operate matters.

### **Attendees**

#### **Hertsmere Borough Council**

- Planning Officer (Duty to Co-operate lead)
- Planning Strategy & Implementation Manager
- Planning Policy

#### **London Borough of Barnet (LBB)**

- Principal Planning Officer
- Principal Planning Officer

#### **London Borough of Enfield (LBE)**

- Principal Planning Officer (Policy)

## **London Borough of Harrow (LBH)**

- Head of Planning Policy
- Planning Policy Team

### **Action Points**

#### **For Hertsmere**

- Continue progressing Regulation 18 Local Plan preparation, aiming for Spring 2026 publication.
- Share further study findings when appropriate (with sensitivity around Green Belt and Grey Belt mapping).
- Seek written comments from neighbouring authorities on emerging study findings.
- Provide transcript and minutes from this and previous Duty to Co-operate meetings.
- Continue outreach to the GLA regarding cross-boundary Green Belt assessment.

#### **For Barnet, Enfield, Harrow**

- Submit any comments regarding the provisional Green Belt, housing needs, or other technical studies once invited.
- Review whether to participate in Hertsmere's viability consultation (where relevant land interests exist).
- Provide any relevant intelligence or policy approaches on:
  - Article 4 Directions for HMOs
  - Monitoring of HMO impact on housing stock
  - Co-living policy implementation and challenges

#### **Joint / Cross-Boundary**

- Maintain ongoing communication by email for further duty-to-co-operate discussions.
- Re-engage following Hertsmere's Regulation 18 consultation for identification of strategic cross-boundary issues.

## **Hertsmere Local Plan – Meeting the Housing Requirement**

Dear Sir/ Madam

I am contacting you in relation to the on-going discharge of the Duty to Co-operate that forms part of Hertsmere's Local Plan-making process. Hertsmere Borough Council (the Council) is already engaging with your organisations, in discharging the requirements of the Duty, in respect of relevant strategic cross boundary matters. It is envisaged that process will continue through the remaining stages of the regulatory process.

This communication is specific to Hertsmere's housing requirement. For the purposes of discharging the requirements of the Duty, this communication identifies the anticipated housing requirement. It confirms that the Council intend to meet the supply and delivery of the housing requirement in full during the forthcoming plan period. Regardless of this objective, Hertsmere's neighbours are invited to state whether they have the capacity to supply and deliver any unmet housing need that may arise during the forthcoming plan period. Responses will be recorded as part of the Duty and reported as necessary. It is anticipated that this will form a necessary part of the future examination in public.

The adopted Hertsmere Local Plan sets out the requirement for housing provision for the Borough between 2012 and 2027. This equates to 266 homes per annum. However, as the adopted plan is now more than five years old, this figure is now out-of-date and no longer applies for plan-making or decision-taking. The figure that must now be used to calculate the Borough's housing requirement is the latest standard method set out in the national planning guidance. Using the standard method leads to a housing requirement of 1,010 additional homes per annum without any buffer applied.

The Housing Delivery Test measurement has shown that the development industry has performed poorly in building-out their consents in the anticipated timely manner – falling below 85% delivery over the three year reporting period. As a consequence, the Borough is subject to the application of the 20% buffer on the five year housing supply. Annualised, this equates to 1,212 additional homes per annum, which will apply for as long as delivery performance remains below 85% over a three year period. Once delivery exceeds 85% the buffer will fall away and Hertsmere's housing target will return to 1,010 additional homes per annum.

Hertsmere Borough Council is currently reviewing its local planning policy. This work is supported by a comprehensive technical evidence base, including the Local

Housing Need Assessment, Green Belt Study, and Local Plan Viability Assessment. A full assessment of sites identified through the HELAA and the Call for Sites process is also underway. Collectively, this evidence will inform the preparation of the new Local Plan, which will be published for consultation under Regulations 18 and 19.

To be found sound at examination, the Council is seeking to meet all of its housing needs. However, in order to discharge the Duty to Cooperate, we are asking neighbouring authorities to confirm their housing capacity and whether they have the ability to accommodate the supply and delivery of any unmet housing need that may arise during the plan period.

The Council is already engaging with relevant national bodies and neighbouring authorities through the Duty to Cooperate. We expect this engagement to continue through the forthcoming regulatory stages, and we anticipate agreeing Statements of Common Ground that set out actions on strategic spatial planning issues.

If you have any queries regarding this request, please do not hesitate to contact me.

**10/02/2026 - Email from LBH**

confirmation of receipt

**25/02/2026 - Email from LBH**

Letter to HBC addressing HBC housing need.

### **Hertsmere Local Plan – Meeting the Housing Requirement – Duty to Cooperate**

Thank you for your letter dated 10th February 2026 in relation to the discharge of the Duty to Co-operate for Hertsmere's emerging Local Plan and the request to the London Borough of Harrow to potentially accommodate any unmet housing need that arises during the plan period.

As discussed at our meeting on 20th January 2026, Harrow is at an advanced stage of preparing its new Local Plan. The hearing sessions associated with the examination process took place between June/July and October 2025 and consultation on a series of main modifications closed on 23rd December 2025. The Inspector's report is now awaited.

Harrow's emerging Local Plan proposes to deliver a minimum of 16,829 homes from deliverable and developable sites over a 20-year period up to 2041; this meets the current annualised London Plan target for Harrow over the Local Plan period. Any additional homes that come forward over and above this target during the plan period will contribute towards London's wider housing need, including that identified in the forthcoming new London Plan and any new housing target set for Harrow. Given the advanced stage in Harrow's plan making process, there is no scope to accommodate any additional unmet housing need from elsewhere at this stage.

The Council acknowledges the poor build out rates referred to in your letter and welcomes Hertsmere's proposal to bring forward a Local Plan that fully meets its housing need. In this regard, I can confirm that Harrow would be happy to participate in further Duty to Cooperate activities to assist your plan making process, including the preparation of a Statement of Common Ground.

Should you require anything further, please do not hesitate to contact me. We look forward to hearing your thoughts on this important matter.