LONDON BOROUGH OF HARROW

Prior Approval for Change of Use from Office to Residential
Briefing Note 29: October 2025
Produced by Inclusive Economy, Place Directorate

PRIOR APPROVAL FOR CHANGE OF USE FROM OFFICE TO RESIDENTIAL

On 30th May 2013 a new amendment to the General Permitted Development Order (GPDO) came into force, for a temporary period of three years, which changed Permitted Development (PD) rights to allow changes of use from Class B1(a) office to Class C3 residential without the need for planning permission. However, prior to making any change of use, developers must apply to the local planning authority to determine whether the prior approval of the authority will be required as to:

- transport and highways impacts of the development;
- contamination risks on the site;
- flooding risks on the site; and
- noise impacts from adjoining properties

Where prior approval is required, development shall be carried out in accordance with details approved by the local planning authority.

Prior Approvals do not require the proposed residential development to meet any design standards or space standards and do not often provide any financial support towards the local infrastructure. Other aspects of development which may be associated with a change of use, such as alterations to facades, extensions etc. will continue to require planning permission.

In April 2014 a further change to the PD legislation allowed the change of use of A1 (shops) and A2 (financial and professional services) to C3 (residential) without the need for planning permission. For the purposes of this briefing note the A2 use class is considered to be office.

When first introduced all changes of use to new homes permitted via the Prior Approval route had to be completed and occupied by 30th May 2016. However, in October 2015 the Government announced changes to the legislation to make these permitted development rights permanent and to extend them to include the demolition of existing offices and re-building for residential dwellings (rather than just the conversion of the existing building). On 6th April 2016 the permitted development rights to allow changes of use from office to residential without the need for planning permission were made permanent.

Harrow

Harrow is one of London’s most attractive suburban areas and is primarily a dormitory suburban area. With a population of 270,725[1] and growing (up by 3,835 on the previous year’s revised estimate), only a relatively small amount of land and buildings are devoted to employment and industrial activity compared to other Outer London and West London boroughs. Harrow covers an area of approximately 50 km^2 and over a quarter of the borough (more than 1,300 hectares) consists of open space, much of which is designated Green Belt or Metropolitan Open Land.

[1] Mid-year population estimate for 2024 from the Office for National Statistics (ONS)

Prior to the change to the GPDO coming into effect, the council had sought an exemption for the Harrow and Wealdstone Intensification Area on the basis of economic harm. Unfortunately, this was not granted. An Action Area Plan for the Harrow and Wealdstone Intensification Area was adopted in July 2013. A change to the designation from an Intensification Area to an Opportunity Area was adopted in the London Plan published in March 2016. A draft new London Plan was published in December 2017 and was followed by a three-month consultation period. The London Plan 2021 was formally published by the London Mayor on 2nd March 2021.

In Harrow 373 applications have been submitted for change of use from Class A2 financial and professional services or B1(a) office to Class C3 residential taking advantage of the changes to PD rights. At the end of September 2025, 156 applications were granted, one was a deemed consent and two were allowed on appeal. For one application prior approval was not required and 93 applications were refused. Five applications still await a decision while one application was 'Finally Disposed of' and 62 applications were withdrawn by the applicant. One further application was categorised as having no objections, as this was for the change of use of premises that had already been permitted, this application plus 44 superseded applications is not included in the analysis to avoid duplication (Table 1).

178 of the 373 Prior Approval applications are for offices in the Opportunity Area. To date, 68 have been granted, one was a deemed consent, one was allowed on appeal and 42 were refused. One application did not require prior approval, 33 have been withdrawn, one application was categorised as having no objections and two await a decision (Table 1).

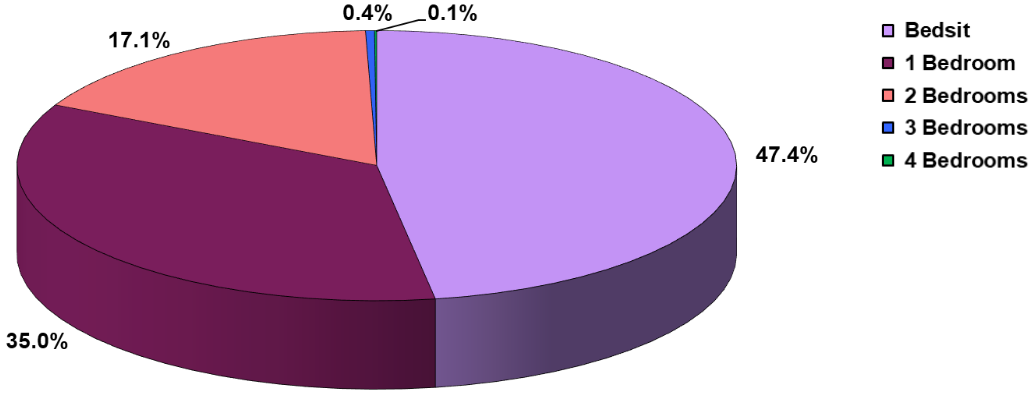
Table 1: Applications for Prior Approval for COU from A2/B1(a) to C3

	Number of apps.	Granted	Deemed Consent	Allowed on appeal	Prior Approval not required	Refused	Finally Disposed of	With-drawn	No decision
Harrow	373	156	1	2	1	93	1	62	5
Opportunity Area	178	68	1	1	1	42	1	33	4

Note: 44 planning applications have been superseded, of these 21 are within the Opportunity Area
One planning application, within the Opportunity Area, was categorised as having no objections

The 159 permitted applications, plus the application where prior approval was not required, would result in 2,674 new dwellings in the borough if they were all implemented and result in a loss of 134,093 m^2 of office floorspace (Table 2).

Figure 1: Proportion of Schemes by Number of Bedrooms



Source: Inclusive Economy, Place Directorate

Of the 2,674 proposed new dwellings (excludes four units in a duplicate scheme and the unit not completed at 365 High Road, Harrow), 1,233 (47.4%) are bedsits, 909 (35.0%) have one bedroom, 444 (17.1%) have two bedrooms, ten (0.4%) have three bedrooms, two (0.1%) have four bedrooms and one has five bedrooms. For one scheme of 73 units the number of bedrooms is not known (Figure 1).

None of the Prior Approval schemes for change of use from office to residential granted permission up to the end of September 2025 include an affordable housing element.

Outside of the Opportunity Area, the largest scheme granted permission, so far, is for 218 self-contained flats at Imperial House, 175-205 Imperial Drive, Rayners Lane, followed by schemes for 165 flats at Middlesex House, 29-45 High Street, Edgware, 101 flats at Bovis House, 142 Northolt Road, South Harrow and 74 flats at Talbot House, 204-226 Imperial Drive, Rayners Lane. These four schemes will result in a loss of 9,587 m^2, 5,505 m^2, 7,580 m^2 and 4,847 m^2 of office space respectively.

Within the Opportunity Area, the largest permitted schemes still valid[2] are for 125 flats at The Heights, 59-65 Lowlands Road, Harrow, 96 flats at Queens House, Kymberley Road, Harrow, 78 flats at First National House, 53-61 College Road, Harrow, 73 flats at Lowlands House, 41-51 Lowlands Road, Harrow, 73 flats at Research Services House, Elmgrove Road, Harrow and 73 flats at Premier House, Canning Road, Wealdstone. These will result in losses of 5,907 m^2, 5,378 m^2, 4,961 m^2, 2,807 m^2, 2,263 m^2 and 1,837 m^2 of office floorspace respectively.

Premier House, Canning Road, Wealdstone

In total, 160 Prior Approval applications for change of use from office to residential have been permitted in Harrow, of these 71 (44.4%) are within the Opportunity Area. These 71 permissions would result in, if completed, the provision of 1,510 residential units, 56.5% of the total number of units, and a loss of 70,968 m^2 of office space, 52.9% of the total floorspace lost (Table 2).

Table 2: Permissions for Prior Approval for COU from A2/B1(a) to C3

	Permissions	Site area (ha)	A2/B1(a) floorspace lost (m^2)	Proposed units
Harrow	160	8.31	134,093	2,674
Opportunity Area	71	3.43	70,968	1,510
Proportion in the Opportunity Area	44.4%	41.3%	52.9%	56.5%

Note: Eight lapsed permissions subsequently superseded by a new scheme have been excluded from these totals

[2] The largest permitted scheme in the Opportunity Area for 262 flats at Kings House, Kymberley Road, Harrow has now lapsed.

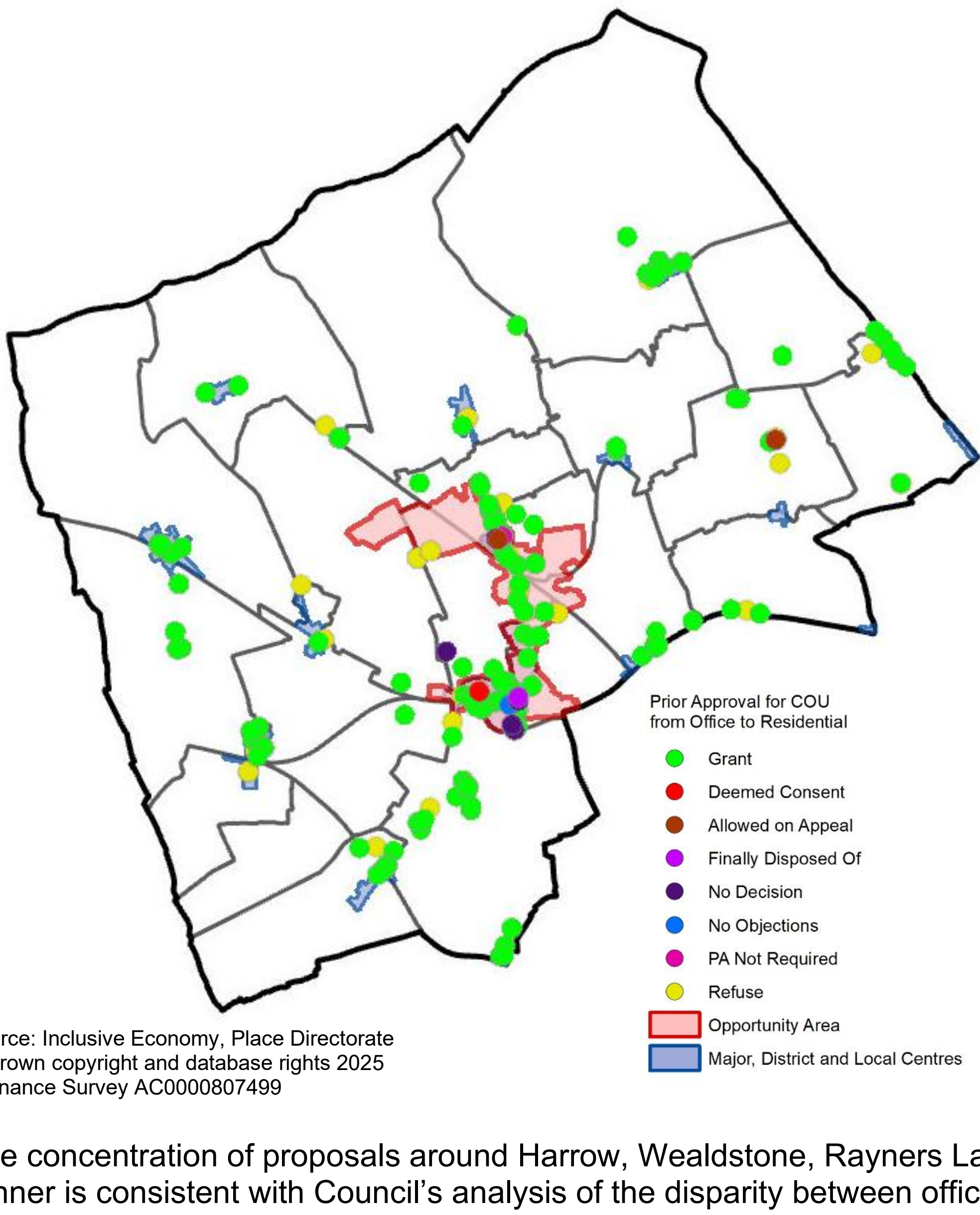
Permissions relating to Occupied Office Floorspace

At the time Prior Approval is granted, it is necessary for the council to confirm whether the applicable floorspace was in occupation for at least six months out of the last three years, for the purposes of determining Mayoral and Harrow Community Infrastructure Levy (CIL) liabilities. In total, out of the 160 permitted applications, 90 were for occupied office floorspace. The level of occupied office floorspace amounts to 75,408 m^2.

Distribution of Prior Approval Schemes

It can be seen that just under half of all proposals for change of use from office to residential, following the Prior Approval route, are within the Harrow and Wealdstone Opportunity Area. However, there are a few proposed schemes located in and around some of the other major, district and local centres in the borough, noticeably Pinner, Rayners Lane and Stanmore, as well as Belmont, Edgware, Kenton, Harrow Weald, Hatch End, North Harrow, South Harrow and Sudbury Hill (Figure 2).

Figure 2: Prior Approvals for Change of Use from Office to Residential



Source: Inclusive Economy, Place Directorate

The concentration of proposals around Harrow, Wealdstone, Rayners Lane, Stanmore and Pinner is consistent with Council's analysis of the disparity between office and residential land values whereas, those around Edgware, Northolt Road, South Harrow and Kenton can be attributed more to unsuitable or redundant office supply.

Correlation between the Office Floorspace Lost and Potential Job Losses

Having regard to the total amount of occupied office floorspace to be lost to residential use via Prior Approval applications and applying a ratio of one employee per 11.3 square metres[(3)], the total corresponding job losses/displacement is circa 6,650 jobs or a loss of £184m in disposable income (3,650 jobs or a loss of £100m in the Opportunity Area)[(4)]. Overall, the office floorspace (occupied and vacant) subject to the grant of Prior Approval to date equates to a lost opportunity for provision of 11,850 jobs in the borough (6,300 jobs in the Opportunity Area).

Prior Approval Schemes in Town Centres

At the end of September 2025 there were 102 Prior Approval permissions providing 1,853 residential units in Harrow's town centres (metropolitan, district and local centres). This would result in a loss of 92,986 m^2 of office floorspace if all the proposed schemes were implemented, 69.4% of the total office floorspace lost in the borough. 820 units have been granted permission outside of the town centres in 57 schemes resulting in a loss of 41,068 m^2 of office floorspace.

Table 3: Permitted schemes by Town Centre

	Site area (ha)	A2/B1(a) office floorspace lost (m^2)	Proposed units	Proportion of total A2/B1(a) office floorspace lost
Belmont	0.04	630	6	0.5%
Edgware	0.00	39	1	0.0%
Harrow	2.32	56,816	1,196	42.4%
Harrow Weald	0.01	142	5	0.1%
Hatch End	0.03	151	3	0.1%
Kenton	0.12	1,919	27	1.4%
North Harrow	0.01	113	2	0.1%
Pinner	0.16	2,507	25	1.9%
Rayners Lane	0.84	15,223	304	11.4%
South Harrow	0.01	122	3	0.1%
Stanmore	0.55	8,560	130	6.4%
Sudbury Hill	0.20	1,922	28	1.4%

[3] Best estimated jobs to floorspace ratio following the London Office Policy Review (LOPR) 2017
[4] Regional gross disposable household income by local authority, Office for National Statistics (ONS), Sept. 2023

	Site area (ha)	A2/B1(a) office floorspace lost (m^2)	Proposed units	Proportion of total A2/B1(a) office floorspace lost
Wealdstone	0.27	4,842	123	3.6%
In town centres	**4.58**	**92,986**	**1,853**	**69.3%**
Outside of town centres	**3.73**	**41,107**	**821**	**30.7%**
Total	**8.31**	**134,093**	**2,674**	**100.0%**

Note: There are no Prior Approval permissions in the following town centres: Burnt Oak, Kingsbury and Queensbury

Harrow Metropolitan Centre has the most proposed residential units with 1,196 (a loss of 56,816 m^2 of office floorspace), 42.4% of the total floorspace lost. The next highest is Rayners Lane District Centre, 304 units (office space loss of 15,223 m^2), Stanmore District Centre, 130 units (8,560 m^2), Wealdstone District Centre, 123 units (4,842 m^2), Sudbury Hill, 28 units (1,922 m^2), Kenton District Centre, 27 units (1,919 m^2) and Pinner, 25 units (2,507 m^2) (Table 3).

Loss of Affordable Housing Provision

Harrow's Core Strategy seeks the maximum viable amount of affordable housing to be delivered on all major residential developments, with a Borough wide target of 40% over the plan period. Prior Approval applications, by virtue of being a form of Permitted Development, are not required to meet the affordable housing requirement (or indeed any other planning obligation or standard) specified in the Local Plan. If all the approved schemes had been Policy compliant i.e. provided 40% affordable housing for schemes of 10 or more units, they would have delivered 956 affordable units.

Empty Property Grants

One of the tools the council uses use to help bring empty properties back into use is by offering empty property grants. This is financial help offered by the council to owners as an incentive to cover part of the repair and renovation costs of their properties. In return the council secures nomination rights to the council for a period of three to five years and the council uses the properties to accommodate families with housing needs. There have, so far, been five Prior Approval schemes in Harrow where an empty property grant was approved:

- High Street, Edgware, first and second floors in a three-storey building converted into 10 self-contained flats. The council processed a grant application to assist towards development works and to secure a five-year nomination. This project is now completed, and the units have been leased via Help2Let for a period of five years. All the units are now occupied and are managed by Help2Let.
- Admiral House, Cardinal Way, Wealdstone is a small three storey office unit converted into three self-contained flats. The council approved a grant application for £45,000. The project is now completed, and leases were signed for a period of five years. All the units are now occupied and are managed by Help2Let.
- Peterborough Road, Harrow, first and second floors in a three-storey building with planning permission for four self-contained flats. The council approved a grant application for £58,000. The project is now completed, and leases were signed for a period of five years. All units are now occupied and are managed by Help2Let.

- Admiral House, Cardinal Way, Wealdstone is a small three storey office unit with plans to convert it to three self-contained flats. A grant application has been approved and works have completed. The three units are occupied by families from the housing homeless list.
- Admiral House, Cardinal Way, Wealdstone is a small three storey office unit with plans to convert it to three self-contained flats. A grant application has been approved and works have completed. The three units are now homes to families in housing need.

High Street, Edgware (third floor) an application for an empty property grant was approved for a further two flats in the roof space (not a Prior Approval application) for £34,000. Leases were signed for a period of five years and the two units are managed by Help2Let.

An office conversion to create six units in Hillingdon was approved by Harrow Council with the permission of Hillingdon Council. The project is now completed, and leases were signed for a period of five years. The six units are now occupied and managed by Help2Let. Harrow Council has approved a number of other empty property grant applications, these were not for prior approval office to residential conversions and have therefore not been listed here.

It would appear that these newly created flats should be counted as affordable housing as they will be providing accommodation for families on low income, claiming benefits or with housing needs. However, this is not the case as affordable housing should be provided in 'perpetuity', meaning that receipts from any sale are recycled to provide other affordable housing. The Department for Communities and Local Government (DCLG) states that "*affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision".*

It cannot be said that the properties will remain at an affordable price for future households as after five years the private landlord could revert to renting the property on the open market, not at an affordable rent. The subsidy that the council puts into these properties by way of empty property grants is not recycled. It is only repayable if the landlord breaks the terms of his deal with the council. If the landlord sells the property after the nomination period expires, the council does not ask for the subsidy back for recycling into another grant. Value for money for grants is achieved through cost avoidance of providing alternative accommodation for homeless families.

Starts

At the end of September 2025 there were ten Prior Approval schemes in progress across the borough providing 44 self-contained flats, with four of these schemes in the Harrow and Wealdstone Opportunity Area providing 35 self-contained flats. This shows that around 80% of all units are currently being provided inside the Opportunity Area compared to outside (Table 4). The largest of these schemes is at Interphone House, 12-22 Herga Road, Wealdstone (29 flats). The other three schemes in progress in the Opportunity Area are at NatWest House, 1-9 St Anns Road, Harrow (4 flats), 10 Wolseley Road,


Interphone House, 12-22 Herga Road, Wealdstone

29A Bridge Street, Pinner

Wealdstone (2 flats) and 184b Station Road, Harrow (1 flat). The following six schemes are all being implemented outside the Opportunity Area. These are at 38 Station Road, North Harrow (2 flats), 29A Bridge Street, Pinner (2 flats), 25 Belmont Circle, Kenton Lane, Harrow (1 flat), 54 Hillbury Avenue, Kenton (1 flat), 55 West Street, Harrow on the Hill (1 flat) and 446-448 Rayners Lane, Harrow (1 flat). This shows that the majority of the schemes currently in progress are very small with five or fewer proposed units, in sharp contrast to the early days of the Prior Approval scheme.

Table 4: Started Schemes

	Started schemes	Site area (ha)	A2/B1(a) office floorspace lost (m^2)	Started units
Harrow	10	0.20	2,412	44
Opportunity Area	4	0.13	1,864	35
Proportion in the Opportunity Area	40.0%	64.0%	77.3%	79.5%

There are ten permitted schemes proposing 49 units which have not yet started including one within the Opportunity Area proposing six units. The largest of these is at Unit 5 Chantry Place, Harrow (granted in May 2025, proposing 14 flats), Broadway House, 80-82 The Broadway, Stanmore (November 2024, 13 flats), Kasaka House, 24-28 Church Road, Stanmore (February 2025, 8 flats) and 21-23 The Bridge & 10A Masons Avenue, Wealdstone (March 2025, 6 flats).

Completions

At the end of September 2025, 115 Prior Approval schemes have been completed in the borough. The largest completion comprises two schemes providing 218 new flats at Imperial House (now Broad House), 175-205 Imperial Drive, Rayners Lane resulting in a loss of 9,587 m^2 of Class B1(a) office space. 48 of the completed schemes are within the Opportunity Area, the largest being at The Heights, 59-65 Lowlands Road, Harrow providing 125 flats and resulting in a loss of 5,907 m^2 of office space, Queens House, Kymberley Road, Harrow (94 flats, loss of 5,378 m^2 of


Queens House, Kymberley Road, Harrow

office space, First National House (now The Hub) and 53-61 College Road, Harrow, (two schemes providing 75 new flats) plus nine new flats in a non-prior approval upward extension resulting in a loss of 4,961 m^2 of office space. Other large schemes completed in the Opportunity Area are at Premier House, Canning Road, Wealdstone (73 flats, loss of 1,837 m^2) plus 39 new flats in a non-prior approval scheme, Research Services House, Elmgrove Road, Harrow (73 flats, loss of 2,263 m^2 of office space) and Lowlands House (now Eden House), 41-51 Lowlands Road, Harrow (73 flats, loss of 2,807 m^2).


Middlesex House, 29-45 High Street, Edgware

The largest of the other completed schemes outside the Opportunity Area are at Middlesex House, 29-45 High Street, Edgware with 165 new flats and resulting in a loss of 5,505 m^2 of office space, Bovis House, 142 Northolt Road, South Harrow (101 new flats, loss of 7,580 m^2 of office space), at Talbot House (now Talbot Skyline), 204-226 Imperial Drive, Rayners Lane (three schemes providing 74 flats, loss of 4,847 m^2 of office space) and at Stewart House, 414-436 Kenton Road, Harrow (43 flats) plus 27 new flats in a non-prior approval upward extension resulting in a loss of 2,096 m^2 of office space.

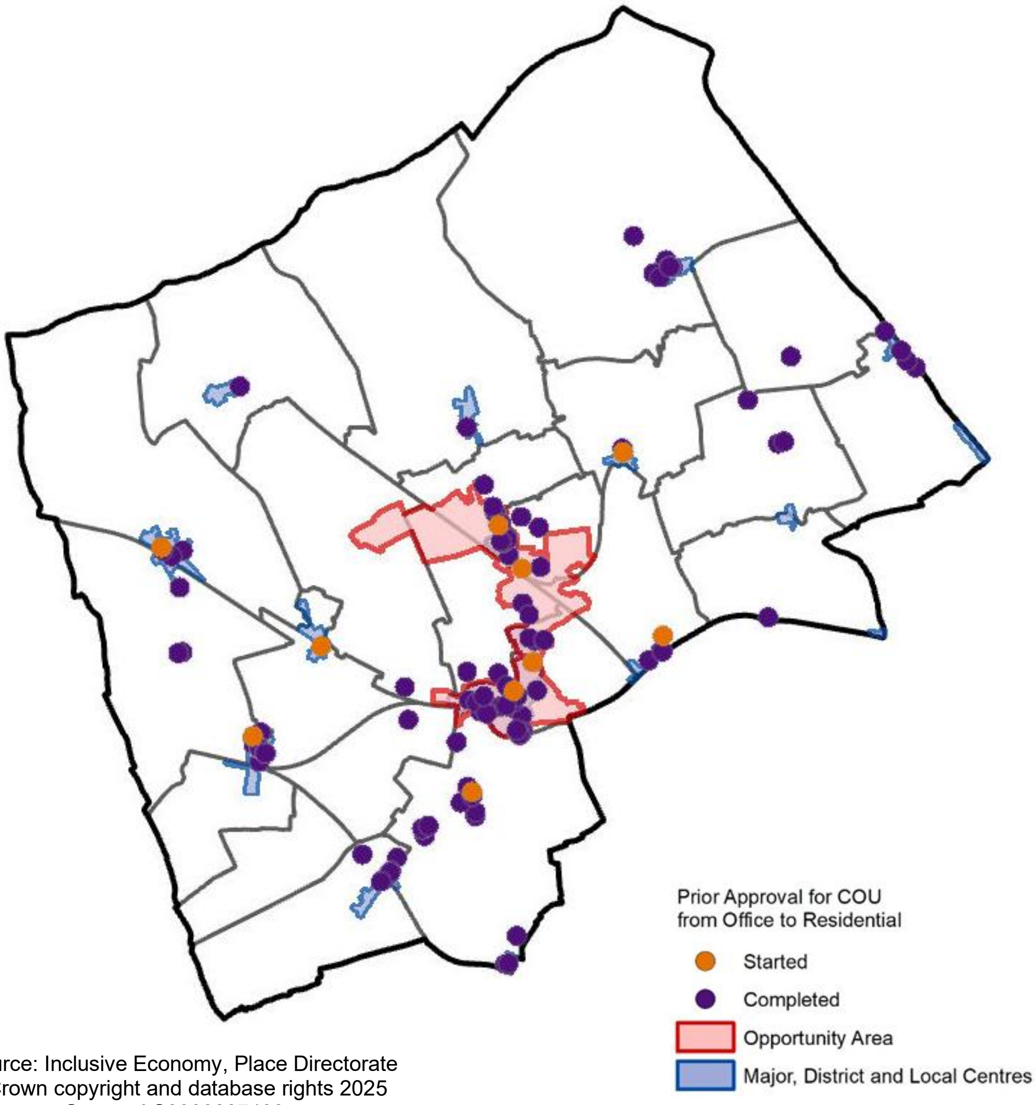

Stewart House, 414-436 Kenton Road, Harrow

Table 5: Completed Schemes

	Completed schemes	Site area (ha)	A2/B1(a) office floorspace lost (m^2)	Completed units
Harrow	115	6.38	101,068	2,020
Opportunity Area	49	2.12	44,332	946
Proportion in the Opportunity Area	42.6%	33.2%	43.9%	46.8%

In total, by the end of September 2025, there were 2,020 units completed in the borough resulting in a loss of 101,068 m^2 of office space. Of these, 946 units are in the Harrow and Wealdstone Opportunity Area resulting in a loss of 44,332 m^2 of office space as a direct result of the changes to Permitted Development (PD) rights allowing the change of use from office to residential without the need for planning permission (Table 5).

Figure 3: Prior Approvals for COU from Office to Residential - Starts & Completions



Source: Inclusive Economy, Place Directorate

Table 6a: Estimated Number of Jobs Lost as a result of Completed Prior Approval Schemes in Harrow

Year	Applications received	Permitted schemes	Completed schemes	Total floorspace lost from completions (m^2)	Occupied floorspace lost from completions (m^2)	Jobs lost from completions (11.3 m^2 per job)
2013/14	47	26	3	420	109	10
2014/15	49	22	12	4,312	1,208	107
2015/16	48	31	20	21,502	9,839	871
2016/17	40	7	18	12,974	2,968	263
2017/18	31	9	12	10,556	7,211	638

Year	Applications received	Permitted schemes	Completed schemes	Total floorspace lost from completions (m^2)	Occupied floorspace lost from completions (m^2)	Jobs lost from completions (11.3 m^2 per job)
2018/19	29	8	10	15,328	4,924	436
2019/20	26	7	7	9,352	8,222	728
2020/21	31	15	4	1,548	782	69
2021/22	20	6	3	3,177	0	0
2022/23	13	5	4	2,248	992	88
2023/24	14	8	7	7,480	5,983	529
2024/25	18	12	12	11,639	3,131	277
2025/26	7	4	3	533	323	29
Total	**373**	**160**	**115**	**101,068**	**45,692**	**4,045**

Since the legislation was introduced in May 2013, 373 Prior Approval applications for change of use from office to residential have been received by the Council. 160 of these applications have been permitted and 115 of the resulting schemes completed by the end of September 2025. For the completed schemes the total amount of floorspace lost is known, and from the occupied floorspace lost totals resulting from these completions an estimate of the number of jobs lost can be calculated by using the best jobs to floorspace ratio model available (1 job per 11.3 m^2).

Table 6b: Estimated Number of Jobs Lost as a result of Completed Prior Approval Schemes in Harrow Metropolitan Centre

Year	Applications received	Permitted schemes	Completed schemes	Total floorspace lost from completions (m^2)	Occupied floorspace lost from completions (m^2)	Jobs lost from completions (11.3 m^2 per job)
2013/14	16	11	2	311	0	0
2014/15	19	3	3	408	163	14
2015/16	18	15	3	6,262	3,494	309
2016/17	6	1	5	7,235	516	46
2017/18	10	3	4	2,910	2,910	258
2018/19	5	0	3	1,365	645	57

Year	Applications received	Permitted schemes	Completed schemes	Total floorspace lost from completions (m^2)	Occupied floorspace lost from completions (m^2)	Jobs lost from completions (11.3 m^2 per job)
2019/20	7	1	0	0	0	0
2020/21	9	5	1	737	737	65
2021/22	4	1	1	2,807	0	0
2022/23	3	2	3	2,110	992	88
2023/24	4	1	2	6,067	5,907	523
2024/25	1	2	4	5,600	132	12
2025/26	3	0	0	0	0	0
Total	**105**	**45**	**31**	**35,812**	**15,496**	**1,372**

Only offices or office buildings that are occupied at the time the proposed Prior Approval scheme is granted are used to estimate the number of jobs lost, although the estimated number of jobs lost can be calculated using the total floorspace lost if required. However, this would include unoccupied offices which may have been vacant for a long period of time. In the 12 years since the Prior Approval legislation was introduced the estimated number of jobs lost as a result of completed Prior Approval schemes is 4,045 in Harrow, 1,372 in the Harrow Metropolitan Centre and 1,225 in the Major, District & Local Centres (Tables 6a, 6b & 6c).

Table 6c: Estimated Number of Jobs Lost as a result of Completed Prior Approval schemes in Major, District & Local Centres

Year	Applications received	Permitted schemes	Completed schemes	Total floorspace lost from completions (m^2)	Occupied floorspace lost from completions (m^2)	Jobs lost from completions (11.3 m^2 per job)
2013/14	16	8	1	109	109	10
2014/15	10	6	3	1,022	970	86
2015/16	16	10	7	3,810	3,602	319
2016/17	14	2	6	2,614	1,483	131
2017/18	9	4	4	4,962	3,880	343
2018/19	11	4	4	11,372	1,785	158
2019/20	12	3	3	2,419	1,561	138

Year	Applications received	Permitted schemes	Completed schemes	Total floorspace lost from completions (m^2)	Occupied floorspace lost from completions (m^2)	Jobs lost from completions (11.3 m^2 per job)
2020/21	4	4	1	134	0	0
2021/22	5	2	1	46	0	0
2022/23	8	3	0	0	0	0
2023/24	6	5	4	651	76	7
2024/25	8	2	4	3,018	46	4
2025/26	0	0	2	460	323	29
Total	**119**	**53**	**40**	**30,617**	**13,835**	**1,225**

Out of the 15 Major, District & Local Centres in Harrow only Belmont (2 schemes), Kenton (2), Pinner (3), Rayners Lane (4), South Harrow (2), Stanmore (4) and Wealdstone (5) have one or more completed Prior Approval schemes replacing occupied office floorspace. There are also completed schemes replacing unoccupied floorspace in Harrow Weald (1), Hatch End (1) and Kenton (1), as well as Rayners Lane (4), Stanmore (4) Sudbury Hill (2) and Wealdstone (7). There are no completed schemes in Burnt Oak, Edgware, Kingsbury, North Harrow and Queensbury.

Lapsed Permissions

Permitted development rights for the change of use from office to residential without the need for planning permission allow three years from the date of the permission to the residential units being completed and occupied (i.e. the change of use having actually occurred rather than enabling works having simply commenced). Any scheme which does not fulfil this requirement will be deemed to have lapsed.

Table 7: Lapsed Permissions

	No. of Lapsed Schemes	No. of Lapsed Units
Harrow	26	555
Opportunity Area	17	517
Proportion in the Opportunity Area	65.4%	93.2%

However, in practice a pragmatic approach would need to be taken with respect to potential enforcement against schemes where works required to facilitate the change of use have commenced but not been sufficiently completed to enable the site to be used and occupied for residential purposes. This is because whilst the office-to-residential permitted development rights were intended to be a short-term measure, it has been extended indefinitely and it is reasonably certain that a new prior approval would be able to be obtained to cover the remaining works/change of use. Each potential enforcement issue would however need to be considered on its individual merits and informed by any subsequent Government guidance/appeal decisions on the matter.

By the end of September 2025, 26 schemes had not started by the time the permission lapsed. 17 of these schemes were in the Opportunity Area, with the largest of these being at Kings House, Kymberley Road, Harrow, a scheme proposing 262 units (Table 7).

Permanent Change to Permitted Development

On 6th April 2016 the permitted development rights to allow changes of use from office to residential without the need for planning permission were made permanent. Any schemes which already have permission and those approved after this date will now have three years from the date of the permission to complete the change of use, i.e. the residential units have to be completed and occupied within three years.

In order to fulfil the requirements of the legislation some developers have a tie-in with a number of charities and are offering the units to people who are claiming benefits. This may be a temporary measure as it is probably easier to offer tenancies to benefit claimants in the first place, rather than seek clients through the usual channels which could take considerably longer.

To further support the delivery of new homes, the PD rights will in future allow the demolition of office buildings and the construction of new buildings in their place for residential use. How this will work in practice will be known when more information is forthcoming.

The London Plan published in March 2021 stated that some permitted development, including change of use from office to residential, requires noise impacts to be taken into consideration by the Local Planning Authority as part of the prior approval process.

Boroughs should introduce targeted Article 4 Directions where appropriate and justified to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability and to maintain flexibility for more comprehensive approaches to town centre housing and mixed-use intensification. When considering office to residential Article 4 Directions in town centres, boroughs are encouraged to take into account the guidelines in ‘Annex 1’ and ‘Policy E1 Offices’ in the London Plan as well as local circumstances.

Sales Price Analysis

The council carried out some comparison of the sales value of new flats provided under PD rights (to allow changes of use from office to residential) with those of new build/conversions provided via a conventional planning permission. One outcome of these comparisons is to determine whether this change in regulations does help to provide relatively ‘low-cost housing’.

Some direct comparisons are possible as a number of Prior Approval schemes are now being marketed. For example, at Bovis House, 142 Northolt Road, South Harrow one-bedroom flats have been sold for £265,200 to £395,000 and two-bedroom flats from £367,200 to £407,949. This compares to £259,950 to £290,950 for one-bedroom flats and £324,950 for two-bedroom flats at Rooks Corner, Roxeth Green Avenue, South Harrow, a scheme permitted via the usual planning route. At Riverside Place, 107 Marsh Road, Pinner (a Prior Approval scheme) the price for a one-bedroom flat is in the region of £305,000 and for a two-bedroom flat, £429,500. This compares to around £265,000 for a one-bedroom flat and £355,000 for a two-bedroom flat at Charter Court, Bridge Street, Pinner (a conventional planning permission scheme).

The location of the Prior Approval schemes and the level of car parking provision will affect the price that can be achieved from the sale of these 'new' flats. Many of the Prior Approval schemes already have car parking from when the building was previously used as an office. On the other hand, newly built housing developments generally have very limited car parking, sometimes just a few spaces for blue badge holders. Properties located close to rail and underground stations, bus routes and other amenities will have a higher value and as a high proportion of the now converted offices were originally constructed in these prime locations, the newly converted properties, by default, tend to be located here.

Evidence suggests that a number of the completed developments have sold as buy to let investments, for example, Grosvenor House, High Street, Edgware and Sherbourne House, Northolt Road, South Harrow. The 12 flats at Sherbourne House were sold for between £192,500 and £325,000, although it is not known how many were bought to let and how many were bought for owner occupation.

It would appear that, as a result of the new legislation, not only do we get some poor-quality housing, with no affordable housing provision or CIL receipts, the flats are still selling at a high cost providing a strong profit margin to the developer.

Conclusions

Although introduced as a means of providing residential dwellings through conversion of redundant and surplus office floorspace, in Harrow, the reality will be the loss of often occupied and prime office space primarily in town centres and the associated loss of jobs and long-term economic sustainability. It remains unclear what the impact of Prior Approvals will be on office supply and on the office market within Harrow and whether there will be flow-on impacts in terms of reductions in total business numbers, business start-ups rates or town centre vitality. As such, it also remains unclear what the impact will be on the local plan policies which were effectively suspended, in particular, those relating to office renewal and the promotion of mixed-use comprehensive redevelopment of Harrow town centre sites.

Whilst Prior Approvals may potentially deliver 2,674 new residential dwellings, this pales in comparison with what might have been achieved through redevelopment of these town centre sites. Furthermore, the inability to seek CIL or financial contributions on these schemes will have a significant impact on the character of the place and demand for services in these areas, which will now fall to the public purse to make good.

In 2024/25, the total number of permissions for new homes permitted via the Prior Approval route was 12, this was 9.8% of the total number of permissions for new homes (123), this percentage was 6.9% in 2023/24, 4.6% in 2022/23, 4.5% in 2021/22, 11% in 2020/21 and 9.4% in 2019/20. The total number of units permitted via the Prior Approval route was 45, 14.3% of the net total number of units permitted (315), this percentage was 22.0% in 2023/24, 3.5% in 2022/23, 7.2% in 2021/22, 23.8% in 2020/21 and 40% in 2019/20. The total number of units permitted via the Prior Approval route was 10.8% of the gross total number of units permitted (417), this percentage was 15.2% in 2023/24, 2.8% in 2022/23, 6.6% in 2021/22, 22.7% in

2020/21 and 33.3% in 2019/20. For Prior Approval permissions the net and gross totals for the number of units are the same[5] (Table 8).

Table 8: Percentage of permissions and permitted units from Prior Approvals for COU from A2/B1(a) to C3 compared to total number of permissions and permitted units

	Perms. for new homes permitted via prior approvals	Total number of perms. for new homes	% of perms. for new homes permitted via prior approvals	Total number of units permitted via prior approvals	Total number of units permitted (net)	% of total number of units (net) permitted via prior approvals	Total number of units permitted (gross)	% of total number of units (gross) permitted via prior approvals
2014/15	32	134	23.9%	682	1,055	64.6%	1,130	60.4%
2015/16	35	186	18.8%	833	3,682	22.6%	3,800	21.9%
2016/17	11	124	8.9%	447	1,328	33.7%	1,421	31.5%
2017/18	16	182	8.8%	625	2,335	26.8%	2,477	25.2%
2018/19	10	142	7.0%	341	1,861	18.3%	2,251	15.1%
2019/20	13	138	9.4%	298	745	40.0%	895	33.3%
2020/21	15	136	11.0%	489	2,052	23.8%	2,150	22.7%
2021/22	7	155	4.5%	96	1,336	7.2%	1,447	6.6%
2022/23	5	109	4.6%	14	405	3.5%	494	2.8%
2023/24	8	116	6.9%	47	214	22.0%	309	15.2%
2024/25	12	123	9.8%	45	315	14.3%	417	10.8%
2025/26	4	n/a	n/a	17	n/a	n/a	n/a	n/a

Note 1: Figures are as they were at the time of the end of each financial year, some permissions have since been superseded
Note 2: Total number of permissions and units for 2025/26 will be available at the end of the financial year.

The total number of units permitted in 2024/25 (417 gross and 315 net) was higher than in the previous year (309 gross and 214 net), but still the second lowest in the last ten years. The number of proposed schemes was higher than in the previous two years but lower than the yearly totals for 2014/15 to 2021/22. There were only four schemes proposing 10 or more units via the conventional planning route. These were at Safari Cinema, 77 Station Road, Harrow, 82 units (both gross and net), Land r/o 121-255 Pinner Road, West Harrow, 37 units (both gross and net), Lindal Hotel, 2 & 4 Hindes Road, Harrow, 22 units (17 units net) and 395, Belmont Service Station, Kenton Lane, Harrow, 13 units (both gross and net). Another scheme at 51-59 St Anns Road, Harrow (16 units) is a Prior Approval application proposing a loss of ancillary retail space. For this scheme the gross and net number of proposed units is the same.

[5] Gross is the total number of proposed residential units and net is the total number of proposed residential units minus the total number of existing residential units.

The largest Prior Approval scheme for change of use from office to residential permitted in 2024/25 was at Broadway House, 80-82 The Broadway, Stanmore (13 units), much lower than the largest schemes in previous years, This shows that generally the number of units being proposed via the Prior Approval route has declined significantly, indicating a reduction in the amount of available office space particularly large office buildings.

The overall conclusion of Council officers remains that, in the majority of instances, these conversions will result in the provision of low-quality housing with very few amenities, foregone opportunities in terms of jobs and housing capacity, and will significantly undermine attempts to bring about the regeneration of Harrow's town centres and high streets.

Further Information

Transport for London (TfL) guidance on Transport Impacts:

http://www.tfl.gov.uk/

Environment Agency Guidance on Flood Risk and Contamination:

http://www.environment-agency.gov.uk/

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