

# Harrow's New Local Plan 2021-2041

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Proposed Submission (Regulation 19) version  
**November 2024**



LONDON BOROUGH OF  
**HARROW**

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# Foreword

As Deputy Leader of the Council, and Portfolio Holder for Planning & Regeneration, it gives me great pleasure to welcome the second consultation on this new Draft Local Plan for the London Borough of Harrow. Once adopted it will be used to guide and shape development in Harrow over the next 15-20 years. The Local Plan is crucial to shaping the Council's approach to housing needs, economic sustainability, health, and inequality, and protecting the suburban character of our Borough.

The policies within the Local Plan are used to guide development and decide planning applications. They also assist in the delivery of many Council services and priorities, such as the securing of affordable and family housing, achieving high quality development in the borough, managing the location, quantity, and quality of development, and promoting the vibrancy and vitality of our town centres. All these aspects help to fulfil the Council's priorities of putting residents first, and creating a borough that residents can be proud of.

The plan recognises that new development will be needed over coming years to meet the needs of Harrow's residents and businesses, and to play a part in meeting London's wider needs, as set out in the London Plan. It seeks to direct much of that development to the most sustainable and central locations such as the Harrow and Wealdstone Opportunity Area and town centres, to help revitalise and regenerate these areas. It is essentially about ensuring the right development happens in the right place.

The plan respects that Harrow is an outer London Borough and has a very strong suburban character. The growth of Harrow came through the expansion of the London underground network, which gave rise to the term 'Metroland'. It is this strong and distinctive character that the Council wish to protect. The plan will help us to resist inappropriate development, including tall buildings, in the suburbs and ensure a high-quality environment in all areas.

The plan also helps us to respond to the climate emergency through measures such as ensuring new developments are energy efficient and carbon neutral and embracing the shift towards sustainable transport and electric vehicles. It also helps to deliver improved rates of biodiversity through the protection, enhancement, and provision of green spaces as part of future development in the borough.

We have reached another significant milestone in the process with the 'submission version' of the draft Plan. It reflects feedback received when we consulted on the first draft of the Plan earlier in 2024. It is the version of the Plan that we intend to submit to Government for independent examination; it will be accompanied by any further comments received during a second round of consultation to be held over November-December 2024. I would encourage you to take the time to read through this important document, attend consultation events and respond through our consultation exercise. Your comments will be invaluable in helping shape Harrow for the better over coming years.



**Cllr Marilyn Ashton**  
Deputy Leader of the Council  
Planning & Regeneration Portfolio Holder



# Chapter 00: Introduction

## What is a Local Plan?

- 0.0.1 National planning policy places Local Plans at the heart of the planning system and consequently the Government considers that it is essential that they are in place and kept up to date. Local Plans set out a vision and a framework for the future development of an area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design.
- 0.0.2 The Local Plan is also a key mechanism in assisting the delivery of many Council services and priorities, such as the securing of affordable housing, achieving high quality of development in the borough, managing the location, quantity and quality of development (including houses in multiple occupancy (HMOs) flat conversions, and tall buildings) and promoting the vibrancy and vitality of town centres, responding to the climate and nature emergency, planning for infrastructure, and fulfilling the Council's priorities of putting residents first, and creating a borough that residents can be proud of.
- 0.0.3 Local Plans are also a critical tool in guiding decisions about individual development proposals, as they are the starting point for considering whether applications can be approved.

## Harrow's current Local Plan

0.0.4 Harrow's Local Plan currently comprises a number of documents:

- a. Core Strategy – adopted February 2012
- b. Development Management Policies – adopted July 2013
- c. Harrow and Wealdstone Area Action Plan (AAP) – adopted July 2013
- d. Site Allocations – adopted July 2013



0.0.5 The development plan is accompanied by an adopted Policies Map that illustrates particular land uses and designations throughout the Borough including areas for protection such as open space and conservation areas, as well as employment and residential activities. It also identifies key sites for development ('site allocations'). The development plan also includes the Joint West London Waste Plan (adopted July 2015).

### National Planning Policy Framework

- 0.0.6 The Local Plan must be consistent with the National Planning Policy Framework (2023) (NPPF). This sets out the government’s planning policies for England and how they should be applied. It must be considered in the preparation of the Local Plan and is a material consideration when making planning decisions. Separate policy documents deal with waste and traveller sites.
- 0.0.7 There is also associated National Planning Policy Guidance (NPPG) which supports the framework and is published online and regularly updated.

### The Regional Planning Framework

- 0.0.8 As Harrow is a London borough, it continues to work within the context of a regional spatial strategy (the “London Plan”) prepared by the Mayor of London and the Greater London Authority (GLA). The London Plan sets out a framework for how London will develop over the next 20-25 years. The London Plan sets out the Mayor of London’s vision for ‘Good Growth’ and helps ensure a coordinated approach to planning across the capital. The London Plan is supported by several related strategies and Supplementary Planning Guidance (SPG) documents that support the implementation of the London Plan. A new London Plan was published on 2 March 2021, replacing earlier iterations.
- 0.0.9 The London Plan is an integral part of the statutory development plan for the local planning authority and Harrow’s Local Plan must be in “general conformity” with it.

### Sub-Regional Planning Framework

- 0.0.10 Alongside the GLA, Harrow Council has been working closely with its West London neighbours through the West London Alliance (WLA) to identify strategic priorities for the sub-region – with a focus on infrastructure – and to develop a shared and common evidence base. In particular, a Joint West London Waste Plan was adopted in July 2015. It is anticipated that a revised plan will be adopted by 2027.

### Neighbourhood Planning Framework

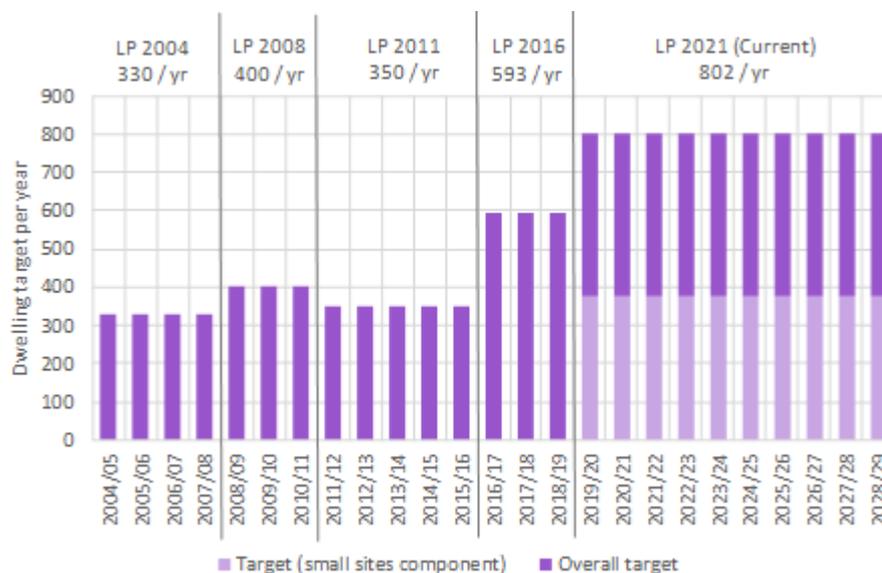
- 0.0.11 Neighbourhood plans are community-led and must meet certain basic conditions and be in conformity with the strategic policies in the Local Plan. They are also an integral part of the statutory local development plan. Harrow does not currently have any neighbourhood plans.

### The need for a new Local Plan

- 0.0.12 It has been some time since Harrow’s current Local Plan was adopted (in 2012/13), and there have been changes in national/regional planning policy and circumstances since then. Most notably this includes an increase in the London Plan housing target for Harrow (see figure below). It is considered that a full review of the current Harrow Local Development Framework documents

is required. The updated documents will also reflect recent changes to national policy and any relevant legislative changes.

### Increase in London Plan target since 2004



### Harrow’s new Local Plan

- 0.0.13 The Local Plan incorporates the concept of ‘Good Growth,’ which underpins the London Plan. This is focussed on ensuring that future growth within London and its boroughs is socially and economically inclusive and environmentally sustainable. Therefore, the objective of Harrow’s Local Plan is to help deliver these strategic drivers at a local level, while ensuring that Harrow’s unique character is respected and celebrated.
- 0.0.14 Creating a Local Plan requires strong partnerships to be established between public and private stakeholders and the local communities that they serve. While Harrow Council is taking a leadership role to plan for the borough, it is important this continues to happen in close collaboration with community groups, and local people and businesses to deliver the Local Plan and achieve the best possible outcomes.
- 0.0.15 This planning framework works together to set the parameters for the plan making process. Preparation of the Local Plan must follow nationally set legal and procedural requirements that inform each of the plan-making stages, processes for community and stakeholder consultation, and the information that is required for the document to be found ‘sound.’ It is critical that Harrow’s Local Plan meets the requirements of the London Plan, that its proposals and policies are supported by evidence, and that the policies are deliverable and consistent with national policy.

## Harrow's Corporate Plan

0.0.16 Harrow's Corporate Plan (2023-26) sets out the Council's priorities over the next three years. These include:

- a) A council that puts residents first
- b) A borough that is safe and clean
- c) A Place where those in need are supported.

0.0.17 The Local Plan sets out the long-term development strategy for the Borough and is one of the Council's most important strategies. It makes provision for new housing, employment and other development needs including infrastructure. It plays a key role in implementing or facilitating many aspects of the Council's Corporate Plan, including flagship actions. The new Local Plan will help ensure that the relevant corporate plan priorities and actions can be delivered in coming years.

## Preparing the New Local Plan

0.0.18 The production of a Local Plan is a staged process, which includes evidence gathering as well as multiple rounds of community and stakeholder engagement to refine proposals.

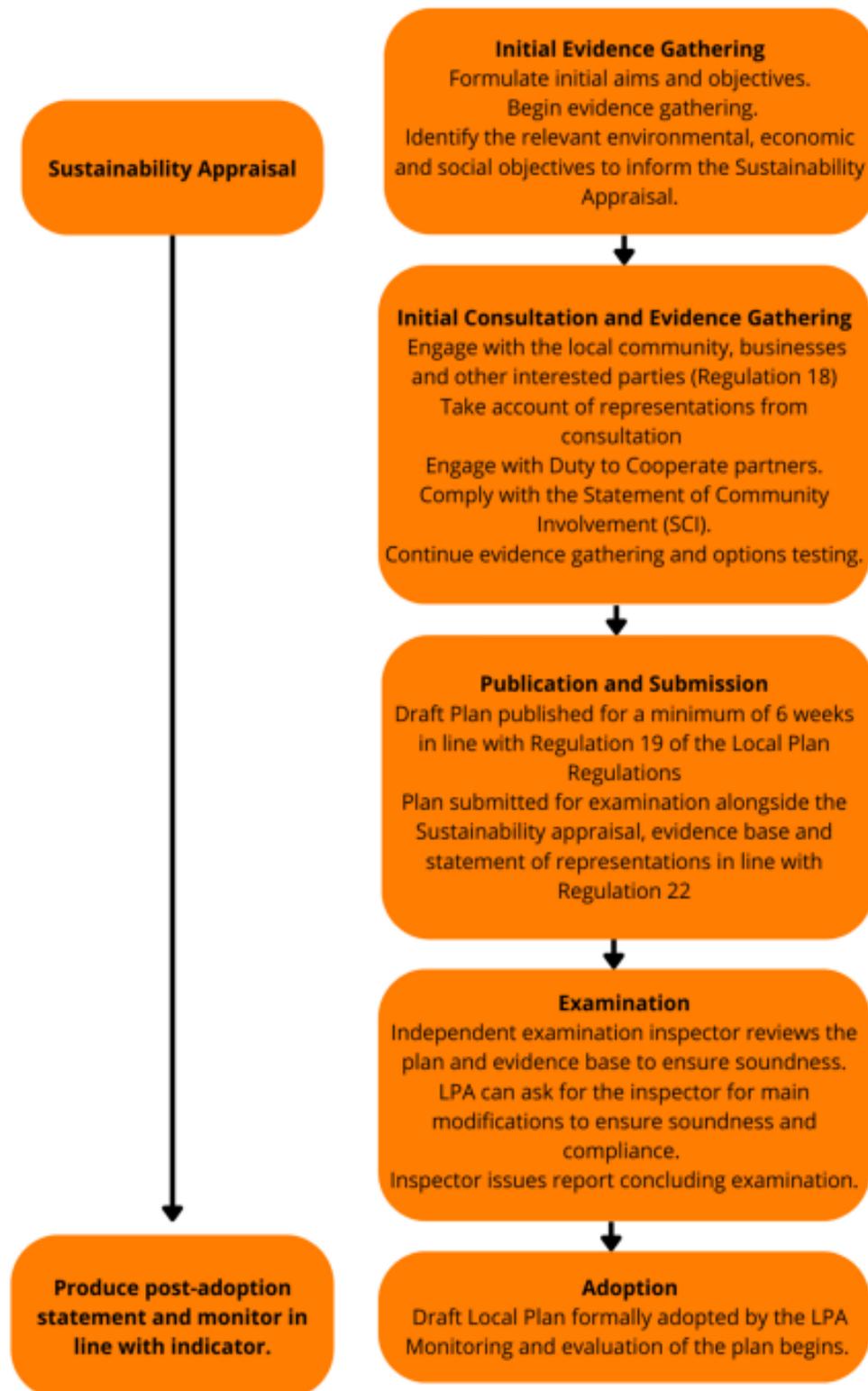
0.0.19 The following summarises the key stages of the Local Plan Preparation (as illustrated in Figure 1):

**Stage 1** Evidence gathering (ongoing – 2018 to 2024): This is an ongoing stage throughout the development of the Local Plan. It involves the compilation of studies and supporting documents to inform the preparation of the Local Plan, ensuring that proposals and policies are appropriate, justified and based on the latest available information.

**Stage 2** Preparation of the Regulation 18 Local Plan (2023-2024): The preparation of the Regulation 18 Local Plan involved the development of a set of draft proposals and policies that were informed by the evidence base and early stakeholder consultation.

**Stage 3** Public consultation on initial proposals (Regulation 18) (26 February 2024 – 25 April 2024): The Regulation 18 Local Plan was subject to a statutory public consultation period (of a minimum of six weeks) to obtain feedback from the local community, residents, businesses, developers and statutory consultees. As part of this process, a 'call for sites' exercise was also undertaken and the development of 'reasonable alternative' spatial options and policies prepared and analysed to enable preferred options to be identified.

**Figure 1 – Key Stages of Local Plan Preparation**



- Stage 4** Modifications to the Local Plan (April 2024 - October 2024): Following the statutory consultation on the Regulation 18 Local Plan, Harrow Council has reviewed the comments received to inform the development of the Regulation 19 Local Plan and the modifications that have been made to this document.
- Stage 5** Publication of the Draft Local Plan Proposed Submission (Regulation 19) version for consultation (November 2024-December 2024): Having taken into account the responses from the Regulation 18 consultation and the findings from the Integrated Impact Assessment (IIA), the council will publish its Final Proposals in a planning document for a statutory consultation period of six weeks before it is submitted to the government for examination by an independent inspector from the Planning Inspectorate. **We are at this stage in the process.**
- Stage 6** Submission of Local Plan for independent examination along with any representations received at pre-submission publication (Regulation 22-25) (Spring 2025): At this stage, the final draft documents are submitted to the government, and an independent inspector holds an examination into the soundness of the plan and the associated IIA and evidence on behalf of the Secretary of State. This involves an assessment against legal and procedural requirements and consideration of the ‘soundness’ of the plan against four tests (see below). The inspector can recommend adoption when the document is considered to satisfy legal requirements and can be considered ‘sound.’
- Stage 7** Adoption by council (Regulation 26) (by December 2025): This involves the formal adoption of the Local Plan by the local planning authority.

0.0.20 Further details relating to the timetable for preparing the Local Plan can be found in the council’s adopted [Local Development Scheme](#) (February 2023). This will be updated in due course if necessary to reflect actual timeframes closer towards submission of the draft Local Plan to Government for examination.

### Tests of soundness

0.0.21 The Local Plan sets out how the Council intends to sustainably manage growth over the long-term. To realise the plan’s vision and to secure the new homes, jobs and infrastructure required for the borough, the plan must be demonstrated to be deliverable. The NPPF sets out ‘tests of soundness’ that help to ensure deliverability. The soundness of the plan is assessed at the examination stage. The tests are that plans must be:

- (a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- (b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- (c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- (d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

### Evidence Base

- 0.0.22 Harrow Council is required to ensure that the Local Plan is based on appropriate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. In particular, local planning authorities must ensure that their assessment of need and the strategies geared to meeting the need for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.
- 0.0.23 A robust evidence base enables the preparation of a sound Local Plan. It also provides the rationale and justification for how the council has developed its policies and strategies in emerging local development plan documents, taking into account the latest available information.
- 0.0.24 The Council has worked with the Greater London Authority (GLA) and neighbouring local authorities in West London to share the development and production of the evidence base, where possible, and ensure that emerging findings accord with the duty to cooperate.
- 0.0.25 Evidence base reports can be found on the [Council's website](#).

### Integrated Impact Assessment

- 0.0.26 The preparation of the Local Plan includes an assessment of how policies could influence sustainability (including environmental, social and economic outcomes) health and equalities. As the assessment covers these three different areas, it is called an Integrated Impact Assessment (IIA). The purpose of the IIA is to highlight and, where possible, address any undesirable effects that may arise on sustainability (such as the environment, society and economy) or on health or equalities as well as identify opportunities for improvements. All Local Plan policies, including alternative policy options, and site allocations have been appraised in the IIA.
- 0.0.27 The IIA fulfils the statutory requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (Directive 2001/42/EU) and associated UK Regulations. It also fulfils the requirements for Health Impact Assessment and Equalities' Impact Assessment. The IIA brings different types of assessment together into a single process.

0.0.28 A separate Habitats Regulations Assessment (HRA) has also been carried out to assess whether protected habitats and species may be adversely impacted by the plan's implementation.

0.0.29 Harrow's Integrated Impact Assessment for the Local Plan can be found on the [Council's website](#).

## Structure of the New Local Plan

0.0.30 The Local Plan is organised as follows within this document:

- (a) *Introductory Chapter (Chapter 01)*: Context and the spatial strategy: provides background information on the Local Plan (including Borough Profile) before setting out the Vision for Harrow and the plan's strategic / spatial objectives. It also establishes the 'spatial strategy' for the Borough, the land-use priorities and overall pattern of development that the plan will seek to deliver.
- (b) *Thematic policy chapters (Chapters 02-10)*: these cover the policy areas that seek to deliver the spatial vision, objectives and strategy of the Local Plan, and contribute to the overarching objective of sustainable development (consistent with the NPPF and the London Plan's 'Good Growth' objectives). Each chapter includes at least one overarching strategic policy and a series of detailed policies. These chapters represent the development management policies that all planning applications will need to comply with.
- (c) *Site Allocations chapter (Chapter 11)*: this sets out the site allocations for a range of uses, including housing, employment, commercial and community uses, that are necessary to deliver the strategic priorities of the area set out in this Plan. Each site allocation includes a site plan and schedule setting out type and mix of development proposed over defined periods of the plan period, together with specific site constraints and considerations.
- (d) *Appendices*: covering glossary, delivery and monitoring framework (will include implementation framework for the Local Plan, as well as the arrangements for monitoring and outcomes over the plan period), protected views, town centres hierarchy, and details of policies the new Local Plan will supersede / replace. Proposed changes to the Policies Map are published as a separate Atlas of Change.

## Public Consultation

0.0.31 Preparation of Harrow's Local Plan will be informed by extensive consultation and engagement with local communities and other stakeholders. Initial Regulation 18 Local Plan Consultation took place over an eight-week period running from 26<sup>th</sup> February to 25<sup>th</sup> April 2024. Further details of the responses received and how these were used to inform this Regulation 19 Local Plan document are set out in the Consultation Statement which can be found on the [Council's website](#).

- 0.0.32 Regulation 19 Local Plan Consultation will take place for a period of six weeks between 4<sup>th</sup> November and 17<sup>th</sup> December 2024. This will be undertaken using the Council’s Local Plan consultation database (email or letter). The draft Plan, supporting documents (i.e. Integrated Impact Assessment) and evidence base will be included on the Council’s website. Hard copies of the draft Local Plan and supporting documents will be made available to view at Greenhill Library, and other libraries in the borough. Documents will also be available to view at the Harrow Hub (Council Depot) by appointment. Further details can be found in the ‘Statement of Representations Procedure and Statement of Fact’ on the Council’s website.
- 0.0.33 A range of engagement tasks will be undertaken including:
- (a) Online consultation hub
  - (b) E-newsletter/social media/newspaper adverts
  - (c) Information displays/leaflets/posters at key sites
  - (d) Email address via: [Local.Plan@Harrow.gov.uk](mailto:Local.Plan@Harrow.gov.uk)
  - (e) Attendance at in person events (see website for details).
- 0.0.34 The Regulation 19 stage is effectively the public’s final opportunity to send in feedback on Harrow’s draft new local plan, as this updated version is essentially the version of the plan that the Council would like to see adopted (following the relevant independent examination process). Responses at this stage should be confined to if the plan passes the legal tests and is sound. The tests of soundness include:
- A. **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
  - B. **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence
  - C. **Effective** - deliverable over the plan period and is based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground
  - D. **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of [national planning policy](#), where relevant. [The London Plan](#) is an integral part of the statutory development plan for the Local Planning authority in Harrow. Harrow’s Local Plan must be in “general conformity” with it.
- 0.0.35 In terms of legal compliance, the Local Planning Authority is required to comply with relevant legislation relating to plan-making including consultation

with the statutory environment consultation bodies, undertaking ‘Duty to Cooperate’ activities and collecting appropriate baseline information etc.

0.0.36 For further details of the consultation, and how to respond can be found via the Council’s website:

**You can find out more by visiting**  
[www.harrow.gov.uk/NewLocalPlan](http://www.harrow.gov.uk/NewLocalPlan)

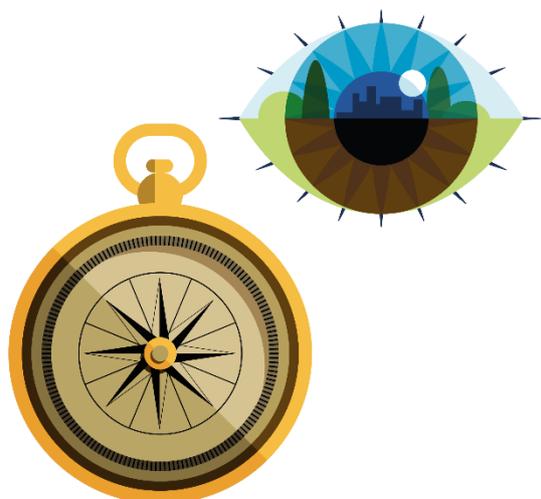
Scan QR code  
for more info.



0.0.37 Or alternatively email: [Local.Plan@Harrow.gov.uk](mailto:Local.Plan@Harrow.gov.uk)

### Next Steps

0.0.38 All representations received will be compiled, reviewed and summarised as part of an updated Consultation Statement and will be considered by the Council in early 2025. The Statement together with the final sustainability report, submission policy map and all other supporting documents will then be submitted to the Secretary of State for the purposes of the Local Plan Examination as part of the next stage of the local plan-making process (Regulation 22- Submission stage) in mid-2025.



# Chapter 01: Borough Profile, Spatial Vision, Strategic Objectives and Spatial Strategy

## Borough Profile

- 1.1.1 Outlined below is a profile of the borough that provides key statistics that reflect the context in which the Local Plan has been prepared and seeks to respond to. It covers a range of areas, including people, housing, infrastructure, the economy, and the environment.
- 1.1.2 The profile is not intended to be exhaustive, as the draft Plan is informed by an extensive evidence base and wide range of statistical information.
- 1.1.3 Further statistical information can be found on the Council’s website<sup>1</sup> and the Office of National Statistics (ONS) website<sup>2</sup>.

### People

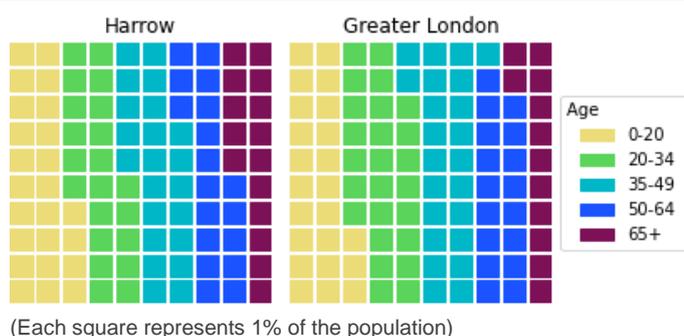
(Census data 2021)

#### Population

Harrow has a resident population of approximately 261,200. In the ten years between 2011 and 2021 the borough saw a 9.3% increase in population compared to the London average of 7.7%.

#### Age profile

Harrow has fewer people in the 20-35 year age brackets than the London average. Harrow has slightly more younger people (<19 years) and more older people (60+) than the London average.



#### Marital Status

Harrow has a higher proportion of people married or in a civil partnership compared to the London average.

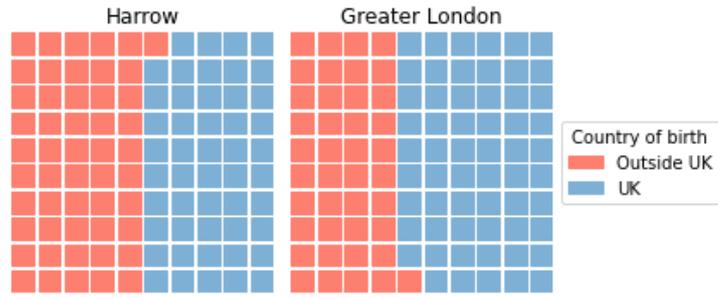


<sup>1</sup> See <https://storymaps.arcgis.com/stories/21489ac0658643998ae8e3b39ac7634e>

<sup>2</sup> See [Census Maps - Census 2021 data interactive, ONS](#)

### Country of Birth

There are a significantly higher proportion of Harrow residents born outside the UK compared with London averages, highlighting higher than average levels of diversity.

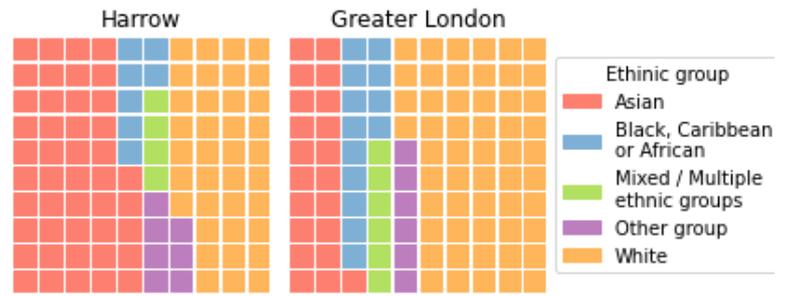


(Each square represents 1% of the population)

### Ethnic Background

Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents being Black, Asian, Multi-ethnic or Other ethnic group.

There are a significantly higher proportion of Asian, Asian British or Asian Welsh residents in the borough compared with London averages.



(Each square represents 1% of the population)

### Religion

Of Harrow’s resident population 83.5% identify as having some form of religion. The most prominent religion is Christianity (33.9%), followed by Hinduism (25.8%), Islam (15.9%), Judaism (2.8%), and Buddhism (1.1%). Over a tenth of the borough identify as having no religion.



(Each square represents 1% of the population)

### Health

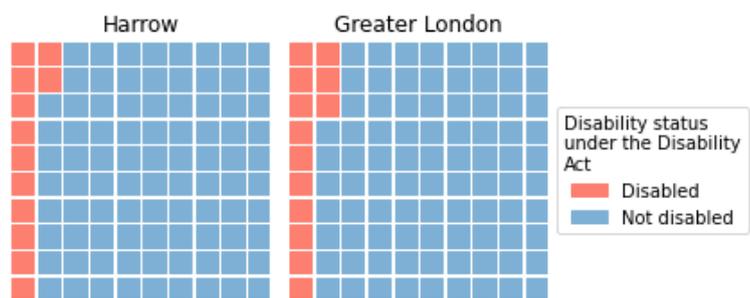
Harrow is a generally healthy borough considering the age profile of residents, many of whom are quite elderly. However, the 2021 Census was undertaken during the Covid-19 Pandemic which may have influenced how people perceived and rated their health.



(Each square represents 1% of the population)

### Disability

According to Census data, there are slightly lower levels of disability in Harrow compared with London averages.



(Each square represents 1% of the population)

### Proficiency in English

Harrow residents have lower levels of English spoken as a main language, which is likely to be reflective of the ethnic diversity in the borough.

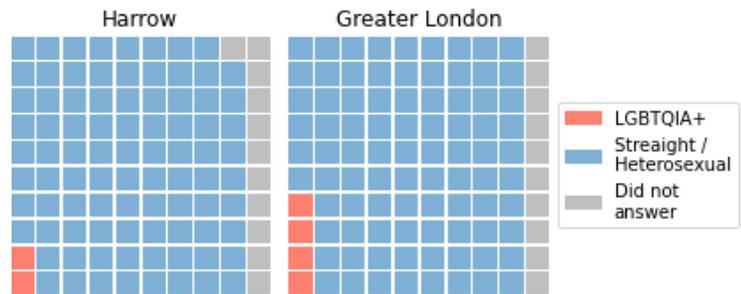
As noted in the Harrow Economic Strategy, Black, Asian and Multi-ethnic residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.



(Each square represents 1% of the population)

### LGBTQIA+

2.03% of Harrow residents aged 16 years and over identify as being part of the LGBTQIA+ community.



(Each square represents 1% of the population aged 16+)

## Homes

(Census Data 2021)

### Household Size

Harrow has significantly larger households than the London average. 32.5% of households have 4 or more people compared to the London average of 24.1%.

Harrow has a significantly lower proportion of lone person households (12.1%) than the London average (20.1%).

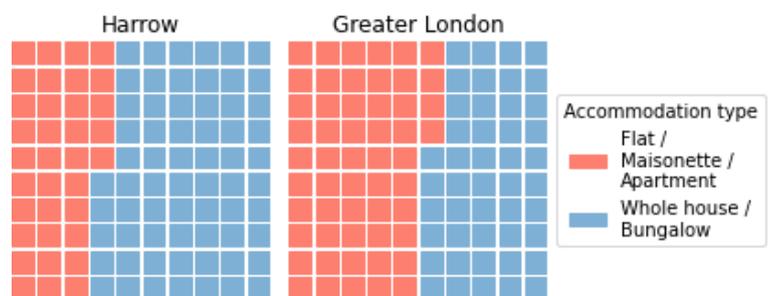


(Each square represents 1% of households)

### Accommodation Type

Harrow is a lower-density housing borough. There are a significantly greater proportion of whole house or bungalow homes in the borough than the London average, which is reflective of a more suburban outer London Borough.

There are significantly lower proportion of flats in the borough than the London average.



(Each square represents 1% of households)

### Occupancy rating for bedrooms

Harrow has slightly fewer spare bedrooms in houses than London averages, and more 2+ occupancy bedrooms in the borough than the London average.

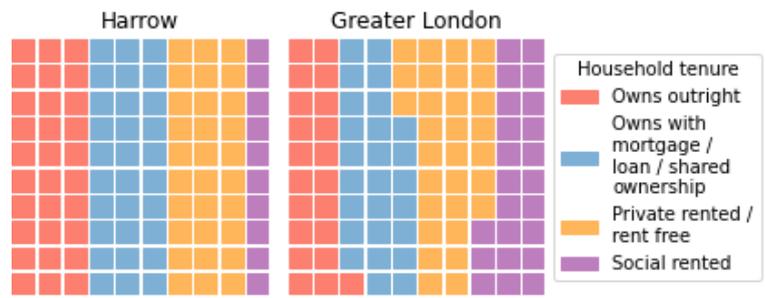


(Each square represents 1% of households)

### Household Tenure

Harrow is a high home ownership borough. There are higher rates of outright ownership of houses compared to London averages, and higher rates of ownership with a mortgage or loan than the London average.

There are significantly lower rates of social rented housing in Harrow compared to the London average.



(Each square represents 1% of households)

### Infrastructure

(Census Data 2021)

#### Car Ownership

Harrow has significantly higher rates of car ownership (75.2%) compared to the London average (57.9%).



(Each square represents 1% of households)

### Working from Home & Travel to work

Harrow has lower rates of residents working predominantly from home compared with London averages. It should be noted that this census data is from 2021 during the Covid-19 Pandemic, during which time a higher proportion of people were working from home.

Harrow has significantly higher rates of car use to get to work compared with the London average, and lower levels of bus and non-underground train usage as a method of transport to work.

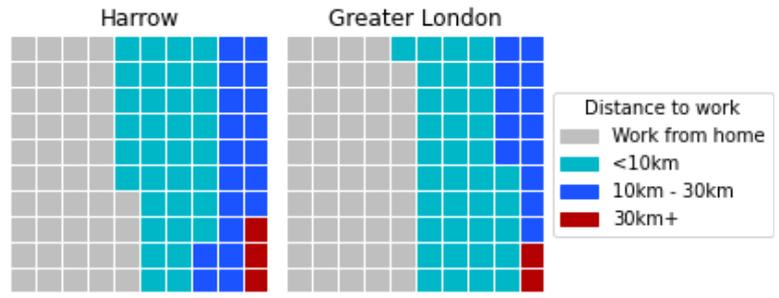
Harrow has significantly lower rates of cycling and walking as a method of travel to work compared with the London average.



(Each square represents 1% of working residents)

**Distance to work**

Harrow workers travel further to get to work, having higher rates of residents travelling 10-30km to get to work than the London average.



(Each square represents 1% of working residents)

**Sustainable Travel**

(Living Harrow: The London Borough of Harrow’s Climate and Nature Strategy 2023-2030)

Over the 3-year period from 2017/18 to 2019/20, 23.5% of journeys in Harrow were made by public transport, 28.7% by walking and 0.8% by cycling, to give an overall number of journeys by sustainable means of 53%. This compares to an outer London average of 55.1% and 64.8% for London as a whole.

**Waste Management**

(Living Harrow: The London Borough of Harrow’s Climate and Nature Strategy 2023-2030)

Harrow has the highest residual waste levels in West London, with an average of 619kg of residual waste produced by each household in Harrow. The borough’s recycling rates of 35.70% are better than the London average of 32.7%

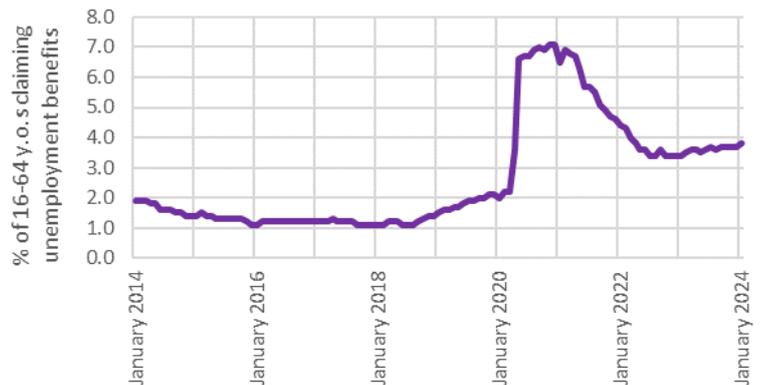
**Economy**

(Harrow Economic Strategy 2023)

**Unemployment**

(ONS Claimant Count)

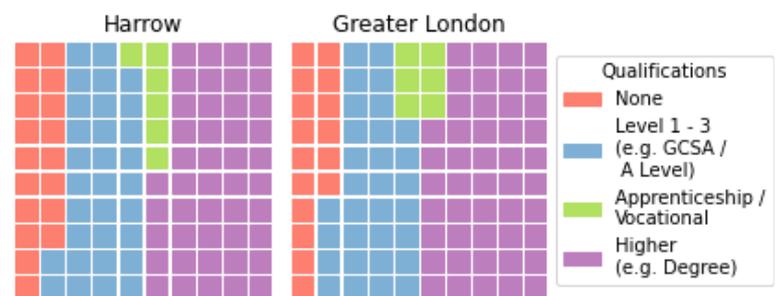
Unemployment in Harrow has almost doubled since the pandemic. In June 2019, 1.8% of working age residents aged 16 to 64 were out of work, this had risen to 3.6% in February 2023



**Qualifications**

(Census data 2021)

17.4% of Harrow residents have no qualifications and are furthest away from the job market. More support is required for entry level qualifications.



(Each square represents 1% of the working-age population aged 16-64)

### Job Density

(ONS Job Density Data)

Job density measures the number of jobs per working age resident and in 2021 the figure for Harrow was 0.509. This is significantly lower than neighbouring boroughs and is the lowest in the West London Alliance (WLA) region.

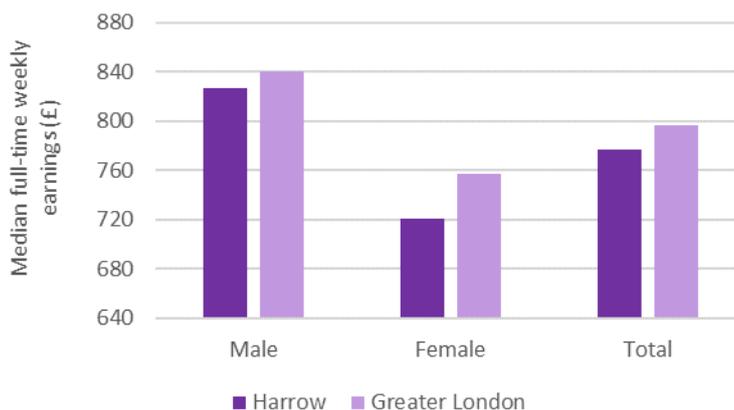


### Resident Earnings

(2023 ONS annual survey of hours and earnings - resident analysis)

Median full-time weekly earnings in 2023 for Harrow residents (£796.3) were higher than the averages in neighbouring boroughs Brent and Ealing, but lower than the London median.

There is a significant gender wage gap in Harrow. Median full-time weekly earnings for men (£827.2) were significantly higher than those recorded for women (£720.8).



### Wages in Harrow

(2023 ONS annual survey of hours and earnings - resident analysis)

Wages paid by Harrow’s businesses are below the London average, with all those that are employed in the borough having median gross weekly earnings of £544.50, which is 26% less than the London median of £731.40.



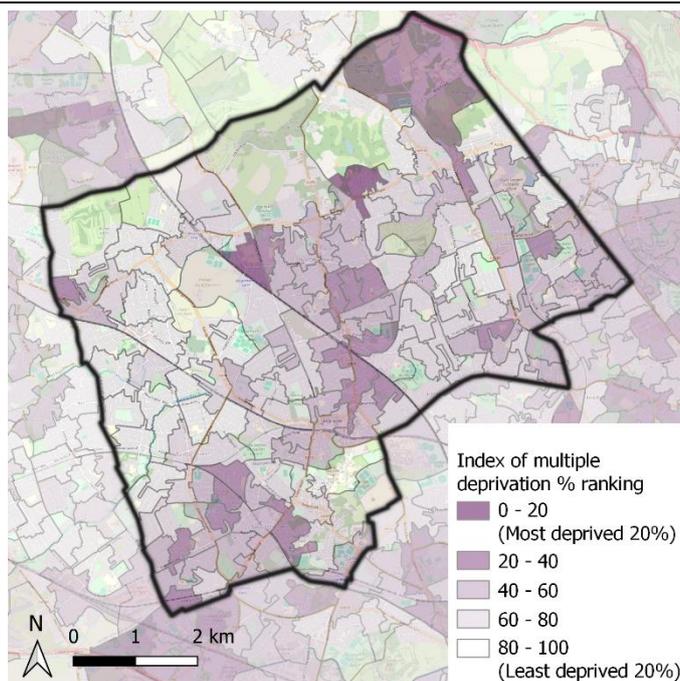
## Deprivation

(English Indices of Deprivation 2019)

Harrow is ranked 207<sup>th</sup> most deprived local authority in England, out of 317, (1 being most deprived and 317 being least deprived).

Harrow is the seventh least deprived London Borough in the Index, although it should be noted that this data was recorded pre-pandemic and unemployment in Harrow has nearly doubled since.

While resident earnings are generally high in comparison to neighbouring boroughs, there are still pockets of deprivation in the borough, these are highlighted in the map on the right.



## Businesses

There has been a decline in the number of Harrow businesses surviving beyond five years which fell from 44% in 2020 to 40.9% in 2021. This is likely reflective of a business base dominated by micro-businesses who are likely to have struggled to stay open after the pandemic and face barriers to accessing finance.

## Environment

Living Harrow: The London Borough of Harrow's Climate and Nature Strategy 2023-2030

### Open Space

Approximately 20% of the borough's land by area is identified as open space. These open spaces comprise more than 80 areas, including parks, allotments, nature reserves and cemeteries.

### Biodiversity

Harrow has 44 designated Sites of Importance for Nature Conservation (SINCs), which includes Bentley Priory Nature Reserve, the borough's only Site of Special Scientific Interest (SSSI).

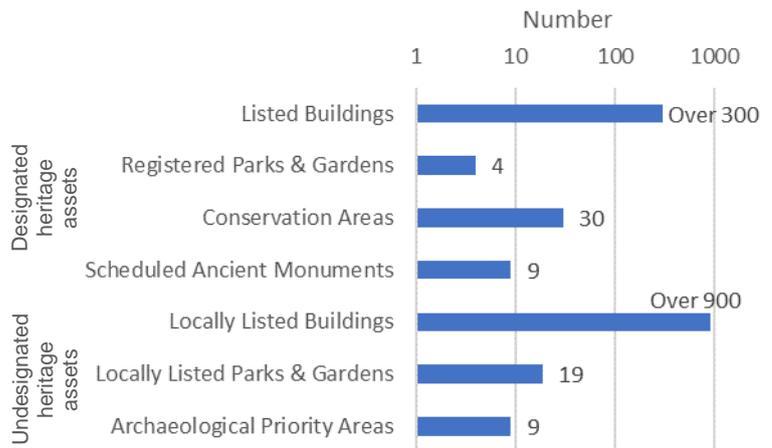
### Water courses

Harrow contains three main rivers (Pinn, Brent and Crane) and numerous ordinary watercourses, which include smaller streams and brooks that are not classified as main rivers.

**Other**

**Heritage**

Harrow contains a wide variety of designated and undesignated heritage assets, which make a vital contribution to the local character. 5 parts of scheduled ancient monuments and one registered park and garden are at risk.



## Spatial Vision, Strategic Objectives and Spatial Strategy

- 1.1.4 This section sets out the spatial vision, strategic objectives and spatial strategy of the Local Plan; these set the overall context and framework from which detailed policies have been developed.
- 1.1.5 Together they represent an ambitious but deliverable framework for how development and growth will be proactively managed within the borough, including the Harrow and Wealdstone Opportunity Area, within Harrow's district and local centres, and other sustainable locations across the Borough; and ensuring that the suburban and open character of the rest of the Borough is sustained and enhanced.

### Spatial Vision

- 1.1.6 The spatial vision sets out the intended character of Harrow by the end of the Local Plan period (2041). It is intended to be aspirational but realistic.

#### **Spatial Vision**

In the year 2041 Harrow will continue to be a thriving outer London Borough, helping London to grow sustainably while maintaining its own identity. There will be a resounding sense of pride in Harrow, it is a place that people want to live, work and visit.

The borough's housing and economic needs will be met, and development will respect the character of the borough and its capacity to evolve over time. This will include conserving and enhancing the unique historic environment in Harrow and safeguarding protected views.

The diverse Harrow community will benefit from an ever-improving quality of life, having a well-connected borough that provides excellent local access to a range of facilities, services, housing, employment, and nature including access to blue and green infrastructure.

Harrow will be a clean and safe borough where residents can settle in homes that suit the needs of their household and lifestyle and help support sustainable and cohesive communities.

Residents and businesses will benefit from the creation of sustainable neighbourhoods where housing, local services, employment, and facilities are within walking and cycling distance. Residents will be healthier and happier due to localised provision of goods and services.

Town centres will be revitalised through innovative measures adapting to their changing roles as places of leisure, arts and culture, in addition to work and retail hubs. Town centres will be exciting places for people to live should they choose.

The borough has continued to respond to the climate emergency and realising the benefits of taking early action to improve our environment. New developments have been energy efficient and carbon neutral. Retrofit of older building stock has been encouraged and facilitated to minimise emissions and ensure residents benefit from clean energy and reduced energy consumption.

Air quality will have significantly improved through shifts to sustainable transport and electric cars. Active transport and EV infrastructure has been bolstered to facilitate the transition. Recycling rates will be some of the best in London.

The borough will see increased rates of biodiversity through the protection and enhancement of existing green spaces, and the provision of additional spaces alongside development. The green belt and metropolitan open land will continue to be the lungs of the borough through enhancement projects.

## Strategic Objectives

1.1.7 The following Borough-wide strategic objectives provide the link between Harrow's spatial vision and the strategy for delivery set out throughout the rest of this document. They reflect the Council's Corporate Plan and other relevant strategies.

<p><b>Our Local Identity</b></p>	<p>Retain, reinvigorate and reinforce the local distinctive character of Harrow's communities by ensuring new development responds positively to the special attributes of its local context.</p> <p>Respecting the cultural, historic, built and natural environments and the need for their integrated management.</p> <p>Ensuring new development is designed, constructed and maintained to a high standard.</p> <p>Conserve and enhance the historic and cultural environment, promoting understanding and appreciation of it. Working with stakeholders to sustain the value of local heritage assets including the international value of Harrow School.</p>
<p><b>Infrastructure</b></p>	<p>Harrow's infrastructure will continue to meet current and future demand through high quality and timely provision. Development contributions will be used to ensure that the community continue to enjoy access to all forms of social and physical infrastructure, including education, health care, recreation and cultural facilities.</p>
<p><b>Transport</b></p>	<p>Sustainable transport infrastructure will be delivered to ensure there are healthy and safe alternatives to private vehicles. The council will facilitate modal shift away from fossil fuel car use.</p>

<b>Air quality</b>	Air quality improvements will continue to be made through high quality design, spatial planning and sustainable infrastructure improvements.
<b>Open Space</b>	The quality of existing open space will be improved, and new open space provision will be facilitated. Public access to open space will be increased.
<b>Biodiversity</b>	The borough's biodiversity will be protected and enhanced, with greenbelt and MOL land becoming a thriving example of biodiversity uplift.
<b>Climate Emergency</b>	Harrow will reduce its contribution to climate change through facilitating net zero development where possible, minimising our reliance on fossil fuels, promoting retrofitting and energy efficiency, and utilising sustainable design methods and reducing flood risk. Harrow will improve its resilience to climate change through mitigation and adaptation.
<b>Waste and Recycling</b>	Harrow will continue to minimise waste and increase recycling rates in line with circular economy principles.
<b>Housing</b>	Harrow will facilitate the delivery of new housing from a range of sources to meet the diverse range of housing needs of a growing population and demographic changes. This will be located within the most sustainable locations of the Borough such as the opportunity area, town centres and sustainable locations to protect, enhance and positively evolve the character of the suburbs.
<b>Affordable Housing</b>	Maximise delivery of genuinely affordable housing to meet the needs of residents.
<b>Mixed and Inclusive Communities</b>	Promote inclusive, mixed sustainable communities, through ensuring high standards in new housing and opportunities to build social interaction, to create cohesive, healthy communities enabling the older population to remain independent and active for longer, as well as providing specialised housing options to meet the needs of vulnerable residents.
<b>Housing Types</b>	Promote a range of well-designed and accessible housing types and sizes, to cater for the needs of an ageing population, younger households with children, and multigenerational families.

<b>Local Economy</b>	<p>Harrow will continue to play an important role in the wider London economy, including cultural, creative and digital industries.</p> <p>Employment opportunities will be retained and promoted in appropriate employment locations.</p>
<b>Town Centres</b>	<p>Town centres (including Metropolitan, District and Local centres) will continue to be attractive, vibrant hubs for investment containing appropriate town centre uses, including thriving evening and night-time economies.</p>

## Spatial Strategy

- 1.1.8 The Spatial Strategy essentially seeks to relate the spatial vision and strategic objectives to areas and localities within the borough and quantify the level of development anticipated in each part of the borough.
- 1.1.9 The Spatial Strategy is accompanied by a map depicting the strategy graphically.

### **Spatial Strategy:**

By 2041, new development and economic growth will provide a minimum 16,040 (net) new low-carbon homes, create over 1,000 additional new jobs and fund significant local infrastructure improvements that benefit Harrow's diverse community.

The high-quality carbon neutral design of new development will contribute to local distinctiveness, creating clean, green and healthy spaces that foster community pride, whilst also delivering on the council's climate and nature objectives.

Comprehensive and coordinated regeneration activity will continue to positively transform the Harrow & Wealdstone Opportunity Area, delivering a minimum of 8,750 additional new homes, and 1,000 additional new jobs.

Harrow town centre will continue to be a vibrant and attractive Metropolitan Centre having benefited from additional arts, leisure, and culture facilities. Adaptable mixed-use and residential development will ensure that there is continued vibrancy in the centre. Employment uses will be bolstered attracting and retaining an array of adaptable businesses and workers to the area. The centre will be the primary location for central public services ensuring high-quality services and facilities are accessible to all. The town centre will benefit from increased connectivity with other parts of the borough, and beyond through sustainable transport linkages.

Wealdstone will strive to become a vibrant centre, with its own distinctive identity. The centre will be a vibrant hub supported by local residents and a strong business community, whose presence has been transformed by the intensification of

employment and carefully managed redevelopment of surrounding industrial estates.

The Station Road corridor will have benefited from redevelopment and environmental improvement linking the Wealdstone and Harrow town centres together.

Harrow-on-the-Hill Station, Harrow Bus Station and Harrow & Wealdstone Station will be accessible major public transport nodes with step free access. Harrow-on-the-Hill station and surrounding area will benefit from a comprehensive redevelopment providing a new focal point for the Harrow Town Centre comprising retail, leisure, office and residential uses. This redevelopment will have contributed to a vibrant new character achieving high standards of sustainability, public realm and residential quality.

Improved pedestrian connectivity and wayfinding between Harrow town centre and Harrow-on-the-Hill will increase legibility in both locations.

The borough's other town centres will accommodate development opportunities commensurate to their character, role, and function.

The Borough's Metropolitan Open Land, Green Belt and other open space will be maintained and enhanced as an interconnected network of green infrastructure and open watercourses supporting biodiversity and healthy lifestyles. Access to green infrastructure will be enhanced.

The quality and accessibility of open space will be maintained, and better provision for children's and teenagers' accessible recreation and play space will have been made.

Harrow's identified heritage assets and historic environment will continue to be valued, conserved, enhanced and celebrated. Areas of special character and architectural significance will be protected. The significance of Harrow's historic environment and its constituent heritage assets, will continue to be valued, conserved, enhanced and celebrated. Specific conservation and enhancement measures identified within Harrow's Conservation Area Appraisals and Management Strategies (CAAMS) and SPDs will be carried out as opportunities arise.

North Harrow District Centre will be restored as a vibrant local shopping and service centre meeting the needs of residents and supporting local business.

The vitality and character of Pinner High Street will have been conserved and enhanced.

In Stanmore, mixed use retail and residential development will have strengthened its function as a District Centre, access to natural green space will be maintained and accessible to residents and visitors.

Partnership working with the neighbouring boroughs of Barnet and Brent will have secured co-ordinated public realm enhancements to Edgware, Burnt Oak,

Kingsbury and Kenton centres, and will have provided improved pedestrian and cycle connectivity between Kenton Station and Northwick Park Station.

Appropriate development will occur on small, brownfield sites in sustainable locations close to town centres, and train and underground stations.

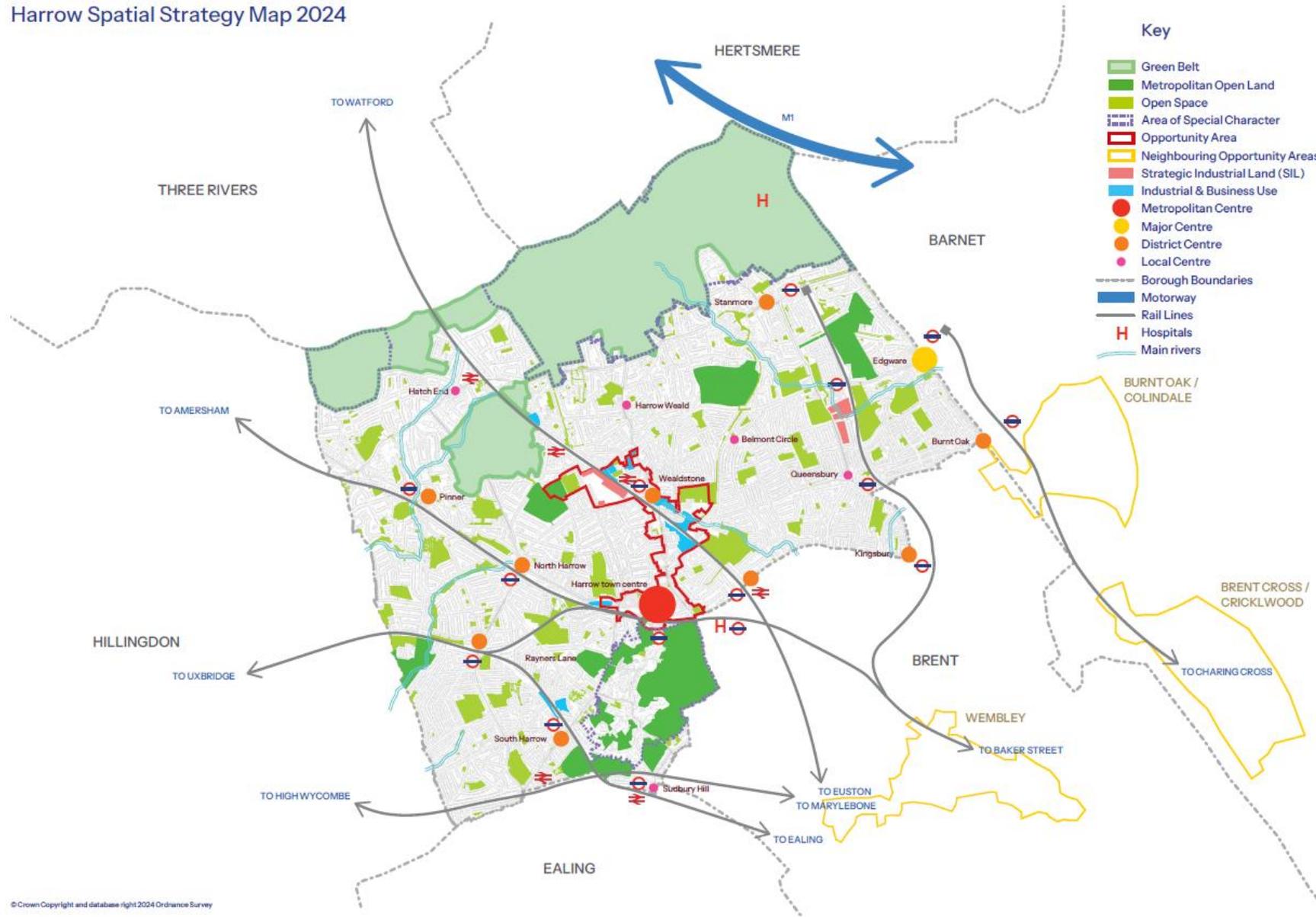
The leafy, suburban character of the Borough's residential Metroland areas, outside sustainable locations, will have been safeguarded as areas of low density, family housing.

Optimising development opportunities on sites across the Borough will provide high quality housing to suit the needs of a range of residents, while respecting the appearance of residential character areas.

Employment land will be directed to appropriate locations remaining flexible and adaptable to meet current and future needs. A sufficient supply of industrial land will be provided and maintained to meet current and future needs.

Harrow will maintain or increase its market share of retail expenditure to secure the vitality and viability of the Borough's town centre network and meet local needs

Harrow Spatial Strategy Map 2024





## Chapter 02: High Quality Growth

## Strategic Policy 01: High Quality Growth

### Linkages:

*NPPF Chapter 11: Making effective use of land*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter: Planning London's Future – Good Growth*

*London Plan Chapter 3: Design*

*London Plan Chapter 7: Heritage and Culture*

### **Strategic Policy 01: High Quality Growth**

Development in Harrow must be of a high quality to ensure proposals relate well to the existing character of the Borough, whilst ensuring new development makes effective use of land and provides necessary uses for Harrow residents. The Council will work with strategic partners in conjunction with the Infrastructure Delivery Plan to identify essential infrastructure to support growth.

- a. Harrow has a range of unique character areas. The Harrow & Wealdstone Opportunity Area can accommodate growth and higher density development due to its existing character, whilst the smaller centres and the strong suburban Metroland character areas are much more sensitive to change. The Council will support design-led developments which respond positively to the character and context of the location within which they are proposed. By following a design-led approach, development will make optimal use of land in accordance with the requirements of the development plan. The Council will support contemporary architecture where appropriate, providing it does not harm or detract from an existing context or architectural character. This is particularly important in relation to heritage assets across the borough.
- b. New development and growth will predominantly be directed into the Harrow & Wealdstone Opportunity Area. New development within the Opportunity Area will by its nature be more intensive than elsewhere in the borough, due to the character of the area and its proximity to public transport and infrastructure. The Opportunity Area contains the two town centres of Harrow (Metropolitan) and Wealdstone (District). The design of development and uses in these areas must be appropriate, improving the vitality and vibrancy of the centres and ensuring development remains at a human scale.
- c. As set out in the London Plan (2021) tall buildings can play a role in the delivery of growth within the borough, particularly to assist in meeting the required housing target. The Council will support appropriate tall building developments that are located within designated tall building zones, and are of a high-quality design, appropriate height, and that provide for a mix of homes or employment opportunities for Harrow residents. Proposals should demonstrate compliance with Policy GR4 (Tall Buildings) of the Local Plan.
- d. Suburban Harrow has a strong character predominantly made up of 2 to 3 storey properties. Whilst it is acknowledged that character will evolve over time, new development within the suburban areas must respond positively to the existing character, ensuring that the Metroland and Village characteristics are respected and retained. Larger scale development opportunities may

arise within the suburban area, but must respect the suburban context, and tie in satisfactorily to the wider character context and fabric.

- e. Across the Borough there are areas of special character, which provide strategic landscapes and distinctiveness to the Borough. The Council will manage development within these locations to ensure that they are not harmed.
- f. The Council will allocate appropriate sites and set out design parameters to assist applicants in understanding the intended development capacity to ensure a site is fully optimised whilst respecting the character of the area it is located in.
- g. Development proposals should demonstrate a level of effective public engagement commensurate to the scale of development.
- h. The design of new development must consider wider policy objectives as set out within the development plan.

### Supporting Text:

- 2.0.1 Land is a finite resource and therefore development must optimise land to ensure that the spatial strategy is achieved. To meet the ambitious targets set by the London Plan and local evidence base requirements, new development must be delivered to accommodate these growth requirements. Design-led schemes will result in land being used optimally, whilst ensuring that the prevailing pattern of development of the area is safeguarded. Whilst the character of an area will evolve over time, a comprehensive design led development, that follows relevant guidance, will ensure that changes are gradual and sensitive to the prevailing pattern of development. High quality development should not appear at odds with the character and context of the site and surrounds, and must ensure the build quality allows it to remain a good example of design for the lifetime of the development.
- 2.0.2 Much of Harrow is comprised of suburban residential areas which were formed by the expansion of the railways north out of London. A strong suburban character still exists, with marginally taller town centres punctuated across the borough. The Harrow Metropolitan Town Centre and Wealdstone District Centre form part of the Harrow & Wealdstone Opportunity Area (as defined in the London Plan (2021)), which provides a notable difference in character. Over the previous Local Plan period, the Harrow & Wealdstone Intensification Area (later renamed the Opportunity Area) has been the focus for development in the borough, given the town centre locations and highly sustainable nature of the defined area. A number of allocated sites within the Opportunity Area have been delivered, delivering a higher quantum of development than initially envisioned through larger scale height and density.
- 2.0.3 Across the plan period, the Harrow & Wealdstone Opportunity Area will remain a focal point for development, in general conformity with the London Plan. New development must respond to the different character areas within it, which comprise suburban residential, large scale development opportunities and town centre locations.

- 2.0.4 Outside of the Harrow & Wealdstone Opportunity Area there is a noticeable suburban character predominately made of 2 to 3 storey buildings. Where town centres adjoin administrative boundaries with neighbouring boroughs, the Council will commit to working with strategic partners to optimise appropriate development of the town centres.
- 2.0.5 Almost two-thirds of Harrow's housing stock dates from the inter-war period. Significant neighbourhoods of semi-detached and short terraces appeared rapidly as fields became homes, gardens, streets, parades and recreation grounds. This 'Metroland' housing continues to be one of the principal characteristics of Harrow's suburbs, particularly to the southeast and southwest of the borough. The characteristics of the developments that shaped Harrow over that time, are still prevalent across suburban Harrow today. New development therefore should be brought forward in a manner that ensures the unique characteristics of Metroland are maintained across suburban Harrow, and not eroded overtime by inappropriate development. To assist with new development in the suburban areas of Harrow, developments should take consideration of the guidance set out within the Harrow Tall Buildings (Building Heights) Supplementary Planning Document (2023) and the wider development plan policies.
- 2.0.6 The Harrow Characterisation and Tall Building Study (2021) provides a borough wide analysis of the character of Harrow. It sets out general building heights, plot sizes, building typologies, land uses, and identifies the distinction between the urban, suburban and semi-rural parts of the Borough. It forms a useful starting point for proposals to assist in understanding the character and context in which a development seeks to occur, and therefore how a proposal is able to evolve to ensure a high-quality design appropriate for its context is achieved. New development proposals should address this evidence base document as a starting point, then provide a more localised context analysis to support any design led application.
- 2.0.7 New development must consider the policies of the wider development plan, ensuring that proposals deliver on all relevant requirements for a successful development. The delivery of high-quality design is not limited solely to the external appearance of a building, as the wider site and context must also be addressed. Where public realm is to be delivered, this must be of a high-quality finish and address secure by design principles and be supported by appropriate infrastructure. Heritage assets contribute to Harrow's character across the borough and their significance needs to be considered as part of all development proposals (see Strategic Policy 02 (Historic Environment)). High quality design also includes ensuring that where a residential use is proposed, the amenity, space and access requirements, of future occupiers meet the policy requirements set out in the development plan.
- 2.0.8 New development will result in change to an area, and the potential impacts will vary depending on the scale of development and the context within which development is located within. The impacts of such development are felt by communities that live in these areas, and they should have an influence on the final development scheme that is submitted for planning permission. Major applications should ensure that early and effective engagement has been

undertaken with the local community. They should demonstrate the level of engagement and how feedback has been positively incorporated into the final submission to the Council.

- 2.0.9 The Council recommend that applicants take advantage of the pre-application service prior to submission of any planning application. This service provides applicants the opportunity to ensure proposals are able to be brought forward with the best opportunity to be policy compliant and therefore receive a positive outcome. Major applications and those that are contentious are also able to take advantage of Planning Performance Agreements to provide continual dialogue between applicants and the Council to look to address multiple issues over what can be a lengthy design evolution process. As part of this, applicants should engage with the Council's design review process. This process engages external professionals who can review and provide advice to applicants to assist in evolving a scheme to ensure it meets the exemplary design that best optimises the site and achieves a scheme that is appropriate for its context.
- 2.0.10 New growth requires infrastructure to support its potential impacts, such as highway improvements, school places, access to doctor surgeries. The Council will work with strategic partners identified through the Harrow Infrastructure Delivery Plan (and sub-regional strategic infrastructure delivery plan where appropriate) to identify required infrastructure to support development. When developing proposals and considering new infrastructure the Active Design Checklist should be followed to assist in supporting physical activity equitably for all within the community. Consideration to Chapters 6 & 7 of this plan should also be undertaken.
- 2.0.11 New development must make a positive contribution to health improvement across the borough. Health Impact Assessments will be required for new development in line with the Harrow Planning Application Validation Requirements.

### **Aerial View, Kenton**



## Policy GR1: Achieving a High Standard of Development

*Linkages:*

*NPPF Chapter 11: Making effective use of land*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter 3: Design*

### **Policy GR1: Achieving a High Standard of Development**

#### *Design and Layout Considerations*

- A. All development proposals must achieve a high standard of design and layout that respects the character and context of the locality that it is proposed in and contribute to healthy places. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.
- B. To ensure the most efficient and optimal use of land, proposals must take a design led approach by:
  - a. Responding appropriately to the local context in terms of building height, bulk, massing, footprint, building line, scale and existing design characteristics;
  - b. Incorporating durable high-quality materials that reflect local character and ensure a high-quality appearance is maintained over the lifetime of the development;
  - c. Providing high quality (hard & soft) landscaping, amenity space and play space to support the overall quality of a successful development. Proposals should seek to retain or enhance existing landscaping, biodiversity or other natural features of merit;
  - d. Include appropriate sustainability measures and contribute where feasible to the circular economy;
  - e. Residential development must comply with London Plan Minimum Internal Space Standards for New Dwellings;
  - f. Ensuring designs are human in scale at ground floor;
  - g. Secure by Design principles should be considered at an early design stage, including ensuring that development (including proposals for redevelopment, refurbishment or change of use) deters and is resilient to terrorism and emergencies. This includes development relating to the public realm;
  - h. Ensure that development complies with the standards set out in the London Plan, and this Local Plan; and
  - i. Taking a comprehensive and coordinated approach to development including respecting existing site constraints including utilities situated within sites.

*Residential Amenity*

- C. Proposals should ensure amenity for existing and future occupiers would be safeguarded, in relation to:
- a. Adequate daylight, sunlight, privacy and outlook for adjoining and future occupiers and users within its context;
  - b. The adequacy of the internal layout of buildings in relation to the needs of future occupiers and any impact on neighbouring occupiers;
  - c. Appropriate levels of amenity space in terms of both quantum and quality for future occupiers;
  - d. Applying the Council's 45-degree code where relevant to ensure appropriate relationship between buildings, primary facing windows to habitable rooms and outdoor private amenity space; and
  - e. The impact of the proposed use and activity on noise, including hours of operation, vibration, dust, air quality and light pollution on future and existing occupiers.
- D. Proposals that conflict with B and C above will be resisted.
- E. In addition to B and C above, proposals seeking to extend homes and / or convert into multiple homes should address further guidance published by the Council on such matters.
- F. Development which would prejudice the future development of other parts of a site, adjoining land, or which would impede the delivery of adopted plans and allocated sites, will be resisted.

*Accessibility*

- G. Residential development must be designed to include wheelchair and accessible standard housing in accordance with Policy D7 of the London Plan. Accommodation for elderly people will also provide appropriate wheelchair accessibility in accordance with Policy HO6.
- H. Non-residential development and change of use proposals must be accessible to all and with dignity (Policy GR2) and new public realm development must also take into account the accessibility needs of all users (Policy GR3)

**Supporting Text:**

- 2.1.1 The spatial strategy / vision sets out the overarching strategy for ensuring new developments are of a high-quality design and do not impact on residents' amenity.
- 2.1.2 This Policy provides details on the key elements of good design, layout and amenity that need to be considered for all scales of development ranging from major development schemes to residential extensions and conversions. New development and changes of use proposals offer the potential to strengthen the valuable components of the Borough's existing built environment whilst realising the opportunity of previously developed land to meet future housing and economic needs without loss of open space. High-quality design should

lead to creating healthy places, which can lead to a better quality of development and environment, which in turn is beneficial to the health of residents.

- 2.1.3 The massing, bulk, scale and height of buildings are significant components of an area's character, and help to convey the distinction between urban, suburban and semi-rural parts of the Borough. New development where appropriate should address the National Model Design Code, National Design Guide and London Plan Optimising Site Capacity Guidance, to ensure development opportunities are optimised and address all relevant material planning considerations (such as heritage etc). London Plan Minimum Internal Space Standards for New Dwellings must be complied with (noting in some instances Nationally Prescribed Space Standards may be appropriate) for new residential development).
- 2.1.4 Quality of execution is key to the realisation of design success, and in this regard the materials, colour, entrance and window details, external services and telecommunications equipment can significantly detract from a building's finished appearance, particularly in mixed use and multi-occupancy developments.
- 2.1.5 The design of the spaces between buildings, both private and public, are key to the quality of the environment and the experience of those who use them. This includes hard and soft landscaping, natural features, boundary treatments, waste and cycling enclosures. The provision of appropriate space around buildings will frequently be informed by the character and pattern of development in the area, which will in turn be relevant to the appropriate gaps and distances needed to safeguard the privacy and amenity of neighbouring occupiers. Space around buildings is important not only as a setting for the building in its context, but also for reasons of functionality. It enables the implementation and successful growth of landscaping schemes, biodiversity net gain, provides an outdoor amenity for occupiers and space for refuse storage, car parking etc. It may also be an important element of a site's plan for the sustainable management of flood risk and surface water drainage. Proposals should optimise the use of a site to ensure that there are no 'left over' spaces that are neither functional nor visually beneficial.
- 2.1.6 Landscaping should be included as an integral part of the overall design of a development proposal, in line with Policy GI4 Urban Greening, Landscaping and Trees. The landscape and buildings need to be considered together from the start of the design process and careful consideration given to the existing character of the site including its typology and existing trees and landscape.
- 2.1.7 The risk of terrorism and other emergencies is ever present, and the nature of the risk and potential consequences will change during the plan period. In this context, all new development, as well as proposals for redevelopment, refurbishment or change of use, should be resilient to terrorism and other emergencies. It should consider secure by design principles, and design responses should be proportionate to the potential risk commensurate to the proposal and its location. This includes development relating to the public realm. Relevant developments should engage with Metropolitan Police

(Counter Terrorism Security Advisors) to ensure appropriate design solutions are incorporated to deter terrorism whilst maintaining a high quality of development.

- 2.1.8 The prevailing building height in Harrow’s suburban areas is two storeys, whilst the Borough’s district and local centres have prevailing heights of two and three storeys. Development within these character areas should be considered against the Tall Building (Buildings Heights) Supplementary Planning Document, which provides guidance on context analysis and design.
- 2.1.9 The standard of privacy and amenity achieved by development will be closely related to the application of design and layout considerations set out above. Protecting privacy and amenity helps to protect the well-being of the Borough’s residents. This concerns the need to protect both future occupiers of new development, as well as the living conditions of neighbouring occupiers or (for mixed use development) the viability of business premises.
- 2.1.10 Sunlight, daylight and outlook are highly valued components of residential quality that need to be considered early within the scheme design, especially where they add to the sustainability and attractiveness of the development. In addition to impacts on neighbouring development, the consideration of satisfactory sunlight, daylight and outlook applies equally to the proposed building(s) on site.
- 2.1.11 Outdoor spaces provide a valuable amenity for occupiers and should have a configuration and relationship with buildings which secure a high level of functionality and environmental quality. The provision of amenity space should consider access for all and provide children’s play space in accordance with Policy S4 (Play and informal recreation) of the London Plan (2021).
- 2.1.12 The Council applies the 45-degree code which is a tool used to help to ensure that visual impacts are appropriately contained, and that reasonable levels of light and outlook are maintained. The Code should not simply be applied on a mechanical basis but as part of an assessment of the site considerations listed above. No part of any new extension should interrupt a 45° splay drawn on plan from the nearest first floor or two storey front or rear corner of any adjacent dwelling, or from a single storey rear corner if that rear elevation has a ‘protected’ window. This would include projecting roof eaves, but not shallow facias or guttering.
- 2.1.13 Privacy and amenity considerations do not stop at the external relationship of buildings and spaces. Noise transfer between dwellings can be as critical to privacy as overlooking, whilst lack of provision for domestic storage space can lead to the use of features which are meant to provide amenity, such as balconies and garages, for this purpose. Whilst the quality of sound insulation is a matter for Building Regulations, the internal layout of rooms can help to mitigate transfer of unwanted noise between homes. The provision of built-in storage is a requirement as set out within the London Plan (2021), along with other policy requirements to ensure high quality living accommodation is delivered. The Mayor of London’s Housing Design Standards LPG (2023)

provides further guidance to assist new development address matters in relation privacy and amenity.

- 2.1.14 The London Plan (2021) has introduced the Agent of Change principle (Policy D13), which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. New residential development must therefore mitigate against nearby lawful noise generating activities, to ensure satisfactory living conditions for residents, whilst ensuring lawful noise generating activities are able to continue to operate without undue pressure from noise sensitive uses.
- 2.1.15 Major applications will be subject to a greater level of scrutiny where the scale and intensity is likely to have greater impacts on the character of an area and potential harm to residential amenity.

## Policy GR2: Inclusive Neighbourhoods

*Linkages:*

*NPPF Chapter 8: Promoting healthy and safe communities*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter 3: Design*

### **Policy GR2 Inclusive Neighbourhoods**

- A. The location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure, will be required to contribute to the creation of inclusive neighbourhoods. In particular:
- a. Non-residential development and change of use proposals must be appropriately located to sustain town centres, neighbourhood parades and local employment opportunities;
  - b. Non-residential development and change of use proposals must be accessible to all and with dignity;
  - c. New residential development and conversion proposals must provide accessible homes, ensuring good access to services and facilities, and;
  - d. All proposals must be safe and secure for Harrow's diverse population in line with Secured by Design principles.
- B. Major proposals will be expected to demonstrate how they contribute to the creation of inclusive neighbourhoods within and beyond the site boundary. Where appropriate this must include public realm improvements to enhance permeability and useability for walking & cycling and compliance with Local Plan Policy GR3 (Public realm and connecting places) and Policy M1 (Sustainable Transport).
- C. Major development within town centres including proposals for public buildings, visitor attractions and tourist accommodation, and Green Grid projects, should make appropriate provision for the comfort and convenience of all users, including those with special mobility requirements.
- D. Sensitive adaptations of heritage assets which contribute to the creation of lifetime neighbourhoods will be supported, taking into consideration other relevant development plan policies.

### **Supporting Text:**

- 2.2.1 A high quality, inclusive and accessible environment benefits the quality of life for visitors and residents alike. It allows everyone to move around more easily and enables residents at all stages of the life cycle to remain in situ as part of

the local community, including families with small children, older people and those with mobility impairment. New development must provide inclusive design in line with London Plan standards, that ensures the creation of neighbourhoods that respond to the diverse population of both Harrow and London.

- 2.2.2 This policy also applies both to new development and to secure adaptations to existing buildings through changes of use, conversions, alterations to non-residential buildings and proposals for new shopfronts. Recognising that adaptations to existing buildings are often more challenging, this policy does not apply to householder applications where it might be disproportionate, but it can be followed voluntarily where substantial extensions are proposed. New development must provide accessible homes in accordance with Policy D7 (Accessible Housing) of the London Plan (2021).
- 2.2.3 The design and layout of all proposals can help reduce crime through providing for increased activity, natural surveillance, access control and creating a sense of ownership. New development should consider Secure by Design principles at an early design stage, including early liaison with the Metropolitan Police to identify site (and wider) issues that currently exist<sup>3</sup>.
- 2.2.4 While the design and layout of all development should achieve full integration into the area within which the site is located, major development proposals provide an opportunity to extend inclusive design principles beyond the site boundary to achieve, for example: enhancements to the pedestrian environment and cycle routes between the site and local destinations; the creation of an accessible and integrated public transport network and public realm; and the implementation of appropriate Green Grid projects. All new public realm should be in accordance with Policy GR3 (Public Realm and connecting places). Ensuring that the sustainable transport network is accessible and inclusive is a priority of the draft Harrow Long Term Transport Strategy and this includes transport infrastructure such as train and bus stations, and pedestrian and cycle network.
- 2.2.5 Likewise, inclusive access to publicly accessible historic buildings and environments will enable residents and visitors to appreciate the Borough's rich heritage irrespective of personal mobility. By placing people at the heart of the design process and ensuring new development and its wider context are inclusive to all, this will enhance the quality of the place and the spaces within it, ensuring their continued relevance and minimising the need for awkward, often costly and unsightly alterations in the future.

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<sup>3</sup> <http://www.securedbydesign.com/>

## Policy GR3: Public Realm and Connecting Places

*Linkages:*

*NPPF Chapter 8: Promoting healthy and safe communities*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter 3: Design*

### **Policy GR3 Public Realm and Connecting Places**

- A. New public realm development will be supported where appropriate. It should:
  - a. Respond to the local and historic context in which it is proposed to be located within;
  - b. Be designed to achieve the Mayor’s Healthy Streets for London indicators to promote non-vehicular travel in a safe, effective, and efficient manner;
  - c. Incorporate careful implementation of electric car charging points, wayfinding signs and infrastructure for cyclists and walking, where these do not add to street clutter. Wayfinding must be done in a consistent manner;
  - d. Demonstrate flexibility to adapt to its locality during both daytime and night-time;
  - e. Provide an appropriate balance of high quality soft and hard landscaping, to enable areas of rest including seating, shade, and shelter;
  - f. Where appropriate, provide for free drinking water and public art; and
  - g. Where appropriate, be adaptable for performance / cultural uses.
  - h. Utilise existing blue and green assets on site where available, or where not present introduce into new development
- B. Public realm developments will be resisted where they do not comply with the above.
- C. Where development delivers new public realm, or joins existing public realm, it must be designed in accordance with (A) above, and demonstrate how it could be tied into existing public realm satisfactorily and relate to the new built environment successfully.
- D. Where appropriate, public realm improvement and its future maintenance and management will be secured through the use of Planning Obligations.
- E. The Council will seek to produce a masterplan for the Harrow Metropolitan Town Centre. New and enhanced public realm must be delivered where it is consistent with the design principles in the Masterplan.

### **Supporting Text:**

- 2.3.1 Public realm constitutes all areas of a development or area that are available for the public to visit, such as a neighbourhood or town centre. The quality of public realm plays a significant role in how people feel about an area, and their willingness to engage with it. It is important that the public realm is designed

to be accessible to all within the community, where people are able to feel safe passing through as part of a journey or choosing to rest or dwell.

- 2.3.2 The design of the public realm cannot be a one size fits all approach, it must provide a high-quality space suitable for the surrounding area and its users. Whilst new public realm provides an opportunity to encourage new high-quality space, it should also respond to the existing landscape / townscape character of an area, picking up on local distinctiveness. Existing local characteristics that contribute to the understanding or appreciation of an area should be retained, including existing trees. All new or enhanced public realm should be based on the guidance as set out Historic England's Streets for All – London (2018), and the Mayor's Healthy Streets Approach.
- 2.3.3 Following this guidance, public realm should ensure that there is not an over reliance on the private motor vehicle. The layout and wayfinding of public spaces should be intuitive and allow people to confidently walk or cycle through the space as part of a wider journey. This approach activates the space, allows for pedestrian priority and positively impacts air quality.
- 2.3.4 Sustainable infrastructure will be encouraged, facilities such as electric vehicle charging points will be supported where these are located in optimal locations across the borough. The Council's draft Long Term Transport Strategy has 'ensuring communities feel safe making journeys' as a priority in recognition that of the role the public realm has in promoting sustainable forms of transport.
- 2.3.5 The public realm must be carefully designed to account for different conditions. Specifically, it must be successful during the daytime and also must ensure that during dark hours, the security and safety of users is considered. Appropriate lighting should be provided, whilst ensuring that light and glare does not become a nuisance to nearby residential occupiers, historic environment or harmful to biodiversity in line with Policy GR7 (External Lighting). Appropriate hard and soft landscaping, and street furniture ensures that areas across the public realm afford opportunities for areas to rest, specifically to provide shade during the heat of the day, or shelter in wetter weather. Landscaping should take the opportunity to install sustainable urban drainage systems to reduce surface water run-off in line with Policy CN4 (Sustainable Drainage). New public realm should, where practicable, provide for environmental improvements in accordance with relevant policies in Chapter 7 of this local plan.
- 2.3.6 Where appropriate, free potable water should be made available to reduce single use plastic.
- 2.3.7 Groups of people congregating can lead to health, safety, and antisocial behaviour concerns. To mitigate this, new public realm should be designed in a manner that allows safe access and exit for a high volume of people across a short period of time. Applicants should utilise the Secured by Design Resilient Design Tool. All new public realm should be developed in accordance with Policy GR3A (Inclusive Design) and GR3B (Safety and Security and Resilience to Hazards).

- 2.3.8 Where development does not enhance the public realm (due to site constraints), a financial contribution to enhancing the nearby public realm may be sought.
- 2.3.9 A Harrow Town Centre Masterplan is proposed to guide development across the Metropolitan Centre, setting out the Council's vision for this area and giving confidence to residents and developers as to what the expectations for development are. New development within this area must follow the guidance set out in the Masterplan. Whilst the Harrow Town Centre Master Plan provides detailed guidance for the area, the policies within the local plan and wider development plan will take precedence.

## Policy GR3A: Inclusive Design

*Linkages:*

*NPPF: Chapter 8 (Promoting Healthy and Safe Communities) Paragraph 90*

*Chapter 12 (achieving well-designed and beautiful places) Paragraph 135*

*London Plan: Policy D5 Inclusive Design*

### **Policy GR3A: Inclusive Design**

- A. All new development is required to comply with accessible and inclusive design standards to ensure that the built environment can be used safely and with dignity by all regardless of disability, age, gender, sexuality, ethnicity, or economic circumstances;
- B. Development proposals must be designed to ensure that there are no inhibiting barriers to access and use, this should be demonstrated in a Design and Access Statement (where required);
- C. Development proposals must be designed with inbuilt flexibility to ensure that they can be adapted for inclusivity and the changing needs of a building's occupants over its lifetime;
- D. Development proposals must be designed in line with Secure by Design principles, specifically considering the safety of women, children and the disabled;
- E. Development proposals for housing must be tenure neutral, there must be no design differences based on the visual appearance or the location of the tenure of dwellings. All communal private amenity space must be accessible to all residents regardless of tenure;
- F. Adaptations to heritage assets will be supported where they make the building or surrounds safer and more inclusive, and substantial harm to heritage significance of the asset is avoided.
- G. Commercial and public buildings must have accessible public toilet provision in line with the latest British Standard, including child changing stations accessible to all parents and carers.

### **Supporting Text:**

#### *Inclusive Design*

- 2.3.10 Inclusive design should create environments which function for everybody, ensuring that everyone can equally, confidently, and independently use buildings, transport, and public spaces. An inclusive environment is one which can be used safely, easily and with dignity by all. It should be convenient and welcoming, with no disabling barriers, and provide independent access without undue effort, separation, or special treatment for any group of people.
- 2.3.11 People of all ages, genders, abilities and backgrounds need an environment that enables active and healthy lifestyles. The built environment must be

designed to promote social interaction through safe and accessible buildings, streets, and meeting places in line with the Equality Act 2010, and the nine protected characteristics identified within it.

- 2.3.12 Without consideration of the barriers that disadvantaged people face, these issues are reinforced and exacerbated in our built environment by restricting peoples access to employment, social experiences, and services. Considering design aspects that break down barriers to access early in the design of a scheme ensures that everyone can enjoy the spaces equitably and safely.
- 2.3.13 New buildings must be designed so that at least 10% of dwellings meet Building Regulation requirement M4(3) (Wheelchair user dwellings), with the balance meeting M4(2) 'Accessible and Adaptable Dwellings) and London Plan Policy D5. Proposals that exceed this threshold will be looked upon favourably. Retrofitted buildings should also seek to meet these standards.
- 2.3.14 All communal and amenity areas in buildings must meet accessibility standards as required by Part M of the Building Regulations (or updated equivalent). It is important to note that accessibility extends beyond wheelchair access and should consider a wide range of disabilities, both visible and non-visible. The design of housing for elderly and disabled people should follow the latest planning guidance notes (<https://www.gov.uk/guidance/housing-for-older-and-disabled-people>).
- 2.3.15 Historic England guidance should be followed where the adaptation of a building is required for accessibility reasons ([Improving Access to Historic Buildings and Landscapes | Historic England](#)). Applicants should consult the Council's Conservation Officer to ensure that harm to heritage assets or their settings is avoided.
- 2.3.16 Accessible public and private toilets should be provided in line with British Standard BS8300:2009. and building regulations ([https://assets.publishing.service.gov.uk/media/66433258bd01f5ed32793a4f/240509\\_ADM\\_amendment\\_booklet.pdf](https://assets.publishing.service.gov.uk/media/66433258bd01f5ed32793a4f/240509_ADM_amendment_booklet.pdf)). These facilities must include sanitary bins, and child changing stations accessible to parents and carers of all genders.
- 2.3.17 Applications for Major developments must demonstrate that community engagement has been undertaken with a diverse group of community members, including those with disabilities. Equalities Impact Assessments should also accompany Major planning applications.

### *Safety*

- 2.3.18 Violence disproportionately affects women, children and the disabled, particularly in their use of the public realm, pedestrian thoroughfares, public transport, and play spaces. UN Women UK reports that 71 per cent of women in the UK have experienced some form of sexual harassment in a public space, with this number rising sharply to 86 per cent among women aged 18–24. Safety in the public realm is also a major consideration for the LGBTQIA+

community who disproportionately face discrimination and harassment in public spaces.

- 2.3.19 Good design should empower people to use cities free from fear of intimidation and violence. Increased feelings of safety occur in activated spaces with ample natural surveillance, therefore minimising ‘hidden’ or isolated areas is paramount to good design. All development proposals should follow Secure by Design principles (see Policies GR1 and GR2) and liaise with the Metropolitan Police to ensure that new or retrofitted spaces are safe, accessible and welcoming.
- 2.3.20 While the issue of violence against women, girls and the disabled is a deep-rooted societal problem, the opportunity exists for the built environment to play a role in increasing safety and inclusivity. For this reason, safety and the perception of safety must not be an afterthought in the design process.
- 2.3.21 The Council will seek to implement the Mayor of London’s Violence Against Women and Girls Strategy (<https://www.london.gov.uk/publications/tackling-violence-against-women-and-girls>), the Women’s Night Safety Charter (<https://www.london.gov.uk/programmes-strategies/arts-and-culture/24-hour-london/womens-night-safety-charter>), and the LGBTQ+ Venues Charter where relevant to the planning process (<https://www.london.gov.uk/programmes-strategies/arts-and-culture/lgbtq-nightlife-venues>) .
- 2.3.22 The Council will work to prevent violence against women and girls through the Harrow Safer Spaces programme which identifies areas that are considered unsafe, or have the perception of being unsafe for women. The Council will work to support organisations that support women and at-risk youth, and with Transport for London to respond to violence and harassment on public transport.
- 2.3.23 The design of healthy and safe spaces should follow the latest planning guidance notes (<https://www.gov.uk/guidance/health-and-wellbeing>). Developers should undertake a Security Considerations Assessment (<https://www.npsa.gov.uk/security-considerations-assessment-sca>) as part of any planning application for major development.

#### *Social Inclusion*

- 2.3.24 The inclusion of accessible public meeting and amenity spaces should be considered in the design of schemes where appropriate, ideally involving women, the disabled and the elderly in their design.
- 2.3.25 Safe and accessible public spaces serve as meeting places that provide opportunities for relaxation, socialisation, leisure and community. These areas are incredibly important for the elderly, disabled, parents and children who may need opportunities to rest while in public. Versatile meeting spaces anchor community events such as markets, meetings and pop-ups.

- 2.3.26 The provision of these spaces also fosters impromptu socialisation which can be incredibly important for those who may suffer from loneliness such as the disabled or elderly.
- 2.3.27 The National Design Guide ([https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National\\_design\\_guide.pdf](https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf)) provides examples of public space that support social inclusion through design

## Policy GR3B: Safety, Security and Resilience to Hazards

*National Planning Policy Framework:*

*Chapter 8; Promoting Healthy and Safe Communities*

*Chapter 12: Achieving well-designed and beautiful places*

*London Plan (2021): Policy D11 Safety, security and resilience to emergency*

*Policy D12 Fire Safety*

### **Policy GR3B: Safety, Security and Resilience to Hazards**

#### Public Realm

- A. All new public realm must be safe for residents and visitors alike. New public realm must be delivered in accordance with Policy GR3 (Public Realm & Connecting Places) and also incorporate appropriate counter terrorism measures, including but not limited to:
- a. Where public realm is intended to be pedestrian focused, appropriate measures to ensure controlled access for motor vehicles (including hostile vehicles).
  - b. Ensure safety measures, particularly for safe exits, when there are high numbers of people expected to be congregating.
  - c. Natural surveillance, good sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places are provided within public realm; and
  - d. Effective but sensitive use of security cameras.

#### New Build or Conversion of Existing Buildings

- B. All new build and conversions / change of use of existing buildings must consider the requirement for counter terrorism and secure by design measures.
- a. Any new build development should aim for a secure by design gold standards, to ensure matters such as crime, fear of crime and anti-social behaviour opportunities are mitigated.
  - b. Proposals that involve vulnerable or high risk uses that require counter terrorism measures must engage with the Metropolitan Police, and any required mitigation measures must be considered early in the design stages.
  - c. Consider any increased vulnerability of any new use when converting an existing building, and ensuring appropriately designed counter terrorism measures respond to the existing building and street scene.
  - d. Undertake a full risk assessment commensurate to the scale and type of development to demonstrate appropriate measures have been included through a change of use of a building to a more susceptible use than existing.

C. All new development must demonstrate appropriate fire safety design measures and strategies to protect life.

### Supporting text

- 2.3.28 Harrow is one of the safest Boroughs within London (2<sup>nd</sup> in 2024), and whilst this is a positive reflection on the Borough, levels of crime within Harrow are increasing slowly over time (in line with overall increasing crime rates across London).
- 2.3.29 Victim based crime rates within the Borough were recorded at 19.89 crimes per 1000 population at the end of 2022. This figure is lower than the London average (24.49 crimes per 1000). Acquisition (particularly vehicle) crime, violence and sexual offences, and anti-social behaviour are the most common crimes across the Borough. It is believed that the majority of crimes are committed by non-residents, with individuals of the public being drawn to the Borough due to its perceived affluence. Despite these low rates, anecdotal evidence suggests that residents still regard crime as a key issue in the area.
- 2.3.30 To ensure that crime, including terrorism is deterred or prevented as much as possible, new development must play its role in providing a built environment that ensures people feel safe when moving through it. Furthermore, new development must also ensure that counter-terrorism measures are incorporated within the design of a scheme and should be commensurate to the vulnerability of the intended use of the site.
- 2.3.31 Applicants should engage early in the design process with the Metropolitan Police and where relevant counter-terrorism bodies (Police Counter Terrorism Security Advisors (CTSA's)). Consultation with the Metropolitan Police will ensure latest legislation and guidance is followed commensurate to the development being proposed. All new development requiring Counter Terrorism measures must ensure that this is undertaken at RIBA Stage 1.

#### *Public realm*

- 2.3.32 All new development that proposes new or changes to public realm, must be delivered in accordance with Policy GR3 (Public Realm and Connecting Places). This policy seeks to provide further detail to ensure that further to a high-quality design, public realm must ensure the safety of those that use it from crime or terrorist activity. Policy GR3A (Inclusive Design) seeks to ensure new development is inclusive for all, in particular for those who are more vulnerable to being the victim of crime, such as women and children. Proposals for new public realm must set out how considerations for more vulnerable users of such space have been addressed.
- 2.3.33 Specific to ensuring public safety, the design of new development of public realm must set out how appropriate steps have been taken to protect users of the space from terrorist activities. Areas that are designed predominantly for pedestrians can result in an area susceptible to terrorist attack, for example

through hostile vehicle. Developments must be supported by a strategy that sets out how counter-terrorism measures are able to be deployed to ensure pedestrian protection, particularly when anticipated to be used for congregation. The use of natural barriers such as trees or appropriate infrastructure such as seating should be considered before purpose-built infrastructure which can appear stark and intimidating in the urban environment.

- 2.3.34 The use of CCTV and lighting within public realm can provide a deterrent to anti-social behaviour and criminal activity. However, care must be taken to ensure that a balance is struck to provide a deterrent without an over-proliferation of CCTV equipment or excessive lighting that leads to wider amenity issues.
- 2.3.35 Where applicable, applicants are advised to review relevant guidance in relation to counter-terrorism<sup>4</sup> to ensure any measures that should be included in a development accord with latest advice.
- 2.3.36 New development adjacent to existing public realm where it increases the risk of terrorism or criminal activity, or significantly increase the amount of people or traffic in the area, should contribute to safety improvements of occupiers of this space. Where appropriate, S.106 obligations will be secured to improve the safety of the public realm, in accordance with Policy GR11 Planning Obligations.

#### *New Build & Change of Use*

- 2.3.37 Retrospective or late consideration of secure by design and / or counter terrorism measures within a development's evolution can lead to reduced effectiveness of measures, increased costs, and have a negative impact on the architectural quality and design of a building and area. All major applications and / or developments must demonstrate consultation with the relevant Metropolitan Police officers (Secure by Design and / or Counter Terrorism), and how new development has taken steps to reduce opportunities for anti-social behaviour and deter terrorist opportunities.
- 2.3.38 Whilst the opportunity to integrate appropriately designed anti-terrorist mitigation into new build developments is much easier to incorporate early in the design stage, retrofitting such measures through the change of use of a building or site can be much more challenging. The vulnerability of the use of a building will have a direct bearing on the level of counter measures required, with care taken to ensure positive contributions to the street scene and/or wider area are not harmed.
- 2.3.39 Risk assessments should be undertaken for all uses that potentially result in a use that is susceptible to terrorism activities, both for new build or for a change of use. Risk assessments must be dynamic to react to changing threat

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<sup>4</sup> [Protecting Crowded Places: Design and Technical Issues](#)  
[National Counter Terrorism Security Office \(NaCTSO\) crowded places guidance](#)  
[Centre for the Protection of National Infrastructure \(CPNI\) – built environment guidance](#)

climate and reviewed to be current and fit for purpose. Early discussion with the Metropolitan Police (both Secure by Design and Counter Terrorism) should be taken to ensure risk assessments are appropriate for the intended use, with the requirements for any essential counter terrorism structures resolved early in the design stage. Ongoing discussion with the Metropolitan Police should be undertaken when reviewing risks assessments, which should be undertaken on a regular basis to remain fit for purpose. Where considered appropriate, and in consultation with the Metropolitan Police, conditions can be used to secure certain elements of counter terrorism measures.

### Fire Safety

- 2.3.40 Fire safety compliance is covered by Part B of the Building Regulations. All new development should set out, commensurate to the scale of development, measures that will be set in place to protect life from the risk of fire. Developers should obtain advice from the London Fire and Emergency Planning Authority (LFEPA).

## Policy GR4: Building Heights

*Linkages:*

*NPPF Chapter 11: Making effective use of land*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter 1: Planning for London's Future – Good Growth*

*London Plan Chapter 3: Design*

### **Policy GR4 Building heights**

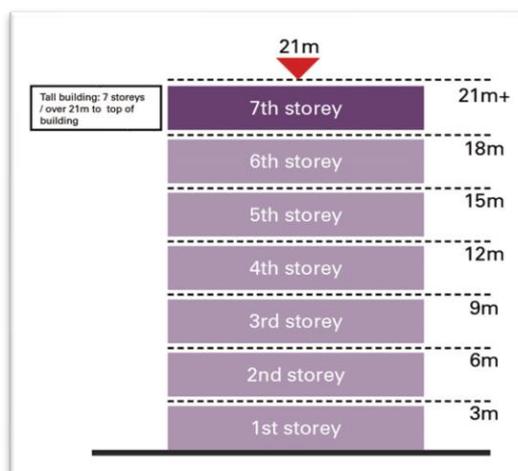
- A. Tall buildings are directed to designated tall building zones within the Harrow & Wealdstone Opportunity Area. Within the Opportunity Area, a tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure).
- B. Proposals shall not exceed the appropriate building heights as set out within the designated tall buildings zones shown within the Policies Maps.
- C. The Council will restrict proposals for tall buildings outside the identified tall building zones.
- D. Outside of the Harrow & Wealdstone Opportunity Area, there are no designated tall building zones. A tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building.

#### Design Considerations

- E. Developments must demonstrate compliance with the design criteria in relation to visual, functional, environmental and cumulative impacts as set out in Policy D9C (Tall buildings) of the London Plan (2021), and shall also address how the proposal:
  - a. Would be appropriate for both the application site and the wider context, especially where a proposal may impact areas of significantly lower density and height;
  - b. The protection and preservation of local heritage views, vistas and landmarks, having regard to Policy GR5 (Views Management), and RAF Northolt Safeguarding Zones (set out on Policies Maps); and
  - c. Address matters in relation to the safety of occupiers and any mitigation required.
- F. Proposals that do not meet the definition of a tall building as set out under Part A will not automatically be considered acceptable, and compliance with the remainder of the development plan is still required.

### Supporting Text:

- 2.4.1 Land is a finite resource and therefore it is paramount to ensure its use is as efficient as possible. Tall buildings provide the opportunity to make efficient use of land (noting that other development can also positively contribute to optimising housing delivery), and deliver against the requirements for a growing population, in terms of new homes, places to work and places for leisure and community. Proposals for tall buildings should provide a design rationale to demonstrate that a tall building is the most appropriate form of development for the site and its context. However, it is recognised that tall buildings can be divisive by their very nature, and can significantly impact an area and the people who visit, live and work in them. The London Plan (2021) through Policy D9 (Tall buildings) requires boroughs to identify locations that are appropriate for tall buildings, and to outline what would constitute appropriate heights within those designated zones. These should be delineated on planning policy maps.
- 2.4.2 The Harrow Characterisation & Tall Building Study (2021) informs the Harrow Local Plan, by providing a detailed contextual analysis of the character of the borough. This has been supplemented by a Tall Building Study (2024) for the Harrow & Wealdstone Opportunity Area, which is the most sustainable location within the borough, and the location able to accommodate the most growth and change. By applying a suitability and sensitivity sifting process, the Tall Building Study (2024) has identified zones within the Harrow & Wealdstone Opportunity Area where tall buildings may be appropriate, and what maximum appropriate heights would be within these zones. Within designated zones, care must be taken to arrange elements of height appropriately, as not all parts of a designated zone will be appropriate for height. Where a new development does not meet the height threshold of a tall building as set out within this policy, this does not automatically make it acceptable. All new development must be considered against the relevant policies of the development plan.
- 2.4.3 Across the Harrow & Wealdstone Opportunity Area / Borough, a tall building is one that is equal to or greater than 7 storeys or 21 meters from the ground level to the top of the building. Necessary paraphernalia such as plant and machinery typically located on the roof of a building is not included as part of this definition. The provision of such rooftop paraphernalia will be assessed within the context of relevant criteria within this policy and relevant policies within the development plan. All rooftop paraphernalia should be distinctly separate to the design fabric of the building, and should be discreetly located on the roof top to ensure it would not be harmful from wider views. Poorly designed and located paraphernalia will not be supported.



- 2.4.4 The Tall Building Study (2024) has undertaken a suitability and sensitivity analysis across the Harrow & Wealdstone Opportunity Area, which has enabled designated tall buildings zones to be identified, along with maximum appropriate building heights. These are set out on the Policies Maps. Whilst a maximum appropriate height has been identified within designated buildings zones, this does not mean that the entire or all parts of the designated area are appropriate for buildings of this height. Proposals for tall buildings within designated areas will need to demonstrate how they are appropriate to both the site and the wider context. Whilst the Harrow & Wealdstone Opportunity Area is an area capable of accommodating tall buildings (within the designated tall building zones), it is adjacent to low-rise suburban areas and this proximity is often abrupt. By reason of this, care needs to be taken to ensure that even within designated tall building zones, stitching into the wider and often much less dense / tall character areas must be satisfactorily demonstrated.
- 2.4.5 Within the remainder of the Harrow & Wealdstone Opportunity Area that is not designated as a tall building zone, there is no presumption in favour of tall building development, by reason of the greater sensitivity within these areas.
- 2.4.6 Outside of the Harrow & Wealdstone Opportunity Area, Harrow as a borough is comprised largely of a suburban character, which consists of generally two-storey residential buildings. Interspersed are predominantly local or district centres, which are also characterised with modest heights. The Harrow Characterisation & Tall Building Study (2021) clearly sets out that much of the character is comprised of residential areas of two storeys in height, and identifies that buildings that would meet the tall building thresholds as set out in the London Plan are unlikely to be acceptable across much of suburban Harrow.

2.4.7 Notwithstanding this, developments that propose further height within suburban Harrow, but is less than the London Plan definition, can still cause harm to the character of the suburban context. Development within the suburban context of Harrow should refer to the Tall Buildings ('Building Heights') Supplementary Planning Document (2023). This does not provide an alternative tall building definition, rather it seeks to provide guidance for applicants to understand what a contextually tall building across different parts of suburban Harrow would be.

### **Tall Building Design Considerations**

2.4.8 All new development that meets the tall building threshold within this policy, must be of an exemplary design. Proposals should address all parts of Policy D9 of the London Plan (2021), specifically the design considerations set out under Policy D9C.

2.4.9 Proposals should refer to the current evidence base suitability / sensitivity criteria to assist in developing tall buildings, and to determine their successful arrangement across a site. When considering the height of buildings within a development, it is assumed that the floor to ceiling height is 3.0m from floor to ceiling.

2.4.10 Whilst from a townscape perspective, areas have been identified as appropriate for tall buildings, new development must consider all relevant policies and constraints for a site and beyond. Particular to LB Harrow, constraints such as protected viewing corridors such as to St Mary's Church may impact on the height arrangement across a site. Policy GR5 (View Management) provides further detail and protected viewing corridors are published on the planning policies map.

2.4.11 Located to the west of LB Harrow is RAF Northolt, whose operations rely on aircraft flying over Harrow Town Centre. As part of operations, safeguarding zones cover the borough and provide a threshold or circumstances as to when to consult with the Ministry of Defence (statutory consultee). The safeguarding thresholds are available on the Council's website.

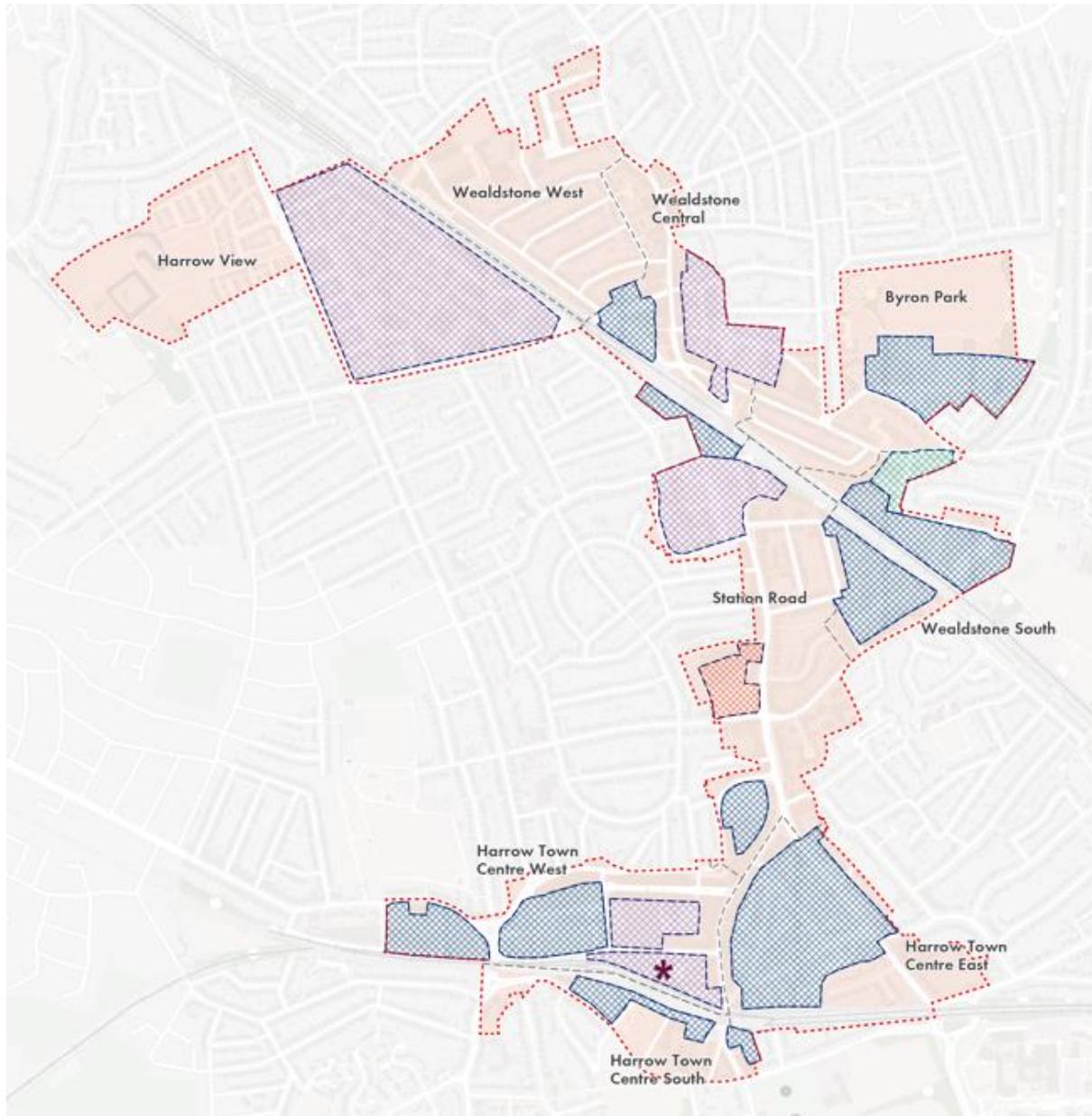
2.4.12 Tall buildings by their very nature can result in a density of living that can mean that a significant number of people occupy a single building. Means of escape from events such as fire must be factored into the early design stages of development, to ensure the protection of human life, a fundamental design and duty of care consideration. In addressing means of escape for fire, this must include two staircases and be of a capacity to ensure users, including maximum occupiers at anyone time of a communal area, are able to evacuate in a safe manner. A fire safety assessment must support any tall building application. This will be assessed by an independent / suitably qualified fire assessor at the applicants' expense.

2.4.13 New development that proposes tall buildings as set out within this policy, are expected to progress through a relevant Design Review Panel, managed by the Local Planning Authority. This should be undertaken to assist in pre-application discussions and to gain independent, expert insight and

engagement. Applicants are strongly advised to take advantage of this paid-for service to ensure robust design scrutiny of a new development is undertaken, which will assist in ensuring a high-quality development is delivered.

- 2.4.14 The Council uses the digital 3D modelling platform VU.CITY in the planning process for assessing the design of major applications, including tall building proposals. In preparing an application for a tall building(s), the use of digital 3D modelling should be utilised. This is an essential step in delivering good growth and high-quality design across the borough and is required for all major applications. Assessing digital models of proposals allows for a better understanding of the impact of new development on the local context. It also helps to assess the massing, scale and design of development and its impacts, both in terms of existing and consented developments.

**Designated Tall Building Zones Map**



Harrow and Wealdstone OA

**Areas appropriate for tall buildings**

Maximum appropriate heights for tall buildings

- up to 8 storeys\*
- up to 12 storeys\*
- up to 15 storeys\*
- up to 18 storeys\*
- 20 storeys (already in situ/as built)

*\*Some, but not all, buildings could be tall in these areas. Of these tall buildings, only a minority should reach the maximum appropriate height. All new development will be subject to consideration against the wider development plan.*

**Areas not appropriate for tall buildings**

## Policy GR4A: Basement Development

*Linkages:*

*NPPF Chapter 11: Making effective use of land*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter 1: Planning for London's Future – Good Growth*

*London Plan Chapter 3: Design*

### **Policy GR4A: Basement Development**

- A. Basement development will be supported for ancillary accommodation where they:
  - a. Do not harm neighbouring residential amenity;
  - b. Do not comprise more than 50% of the amenity spaces within a site;
  - c. Do not extend into the rear garden greater than 50% of the depth of the host dwelling when measured from the principal rear elevation;
  - d. Do not exacerbate flood risk, ground water conditions, ground stability or harm tree roots within the application site or neighbouring sites;
  - e. Remain as ancillary accommodation to the primary dwelling, retaining internal access through the primary dwelling with satisfactory amenity conditions.
  - f. Provide ancillary features such as lightwells, grilles and railings that are appropriate in size and number and do not result in visual clutter within the front garden causing harm to the street scene.
  - g. Continue to provide for appropriate landscaping and parking provision within the front garden
- B. Basement proposals for independent housing will not be supported.
- C. Habitable space within basement proposals located within Flood zone 3a/3b will not be supported.
- D. All basement proposals must be supported with a Construction Method Statement

### **Supporting Text**

- 2.4.15 Although basement developments can help to make efficient use of the borough's limited land it is important that this is done in a way that does not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas or the natural environment.
- 2.4.16 Whilst much of a basement is set below ground and therefore for the most part not overly visible from the wider area, certain required design elements and paraphernalia associated with them can cause harm to the application property and wider area. Where basements seek to provide further habitable

space within a home, access to natural light must be achieved. This will often be achieved by removing part of the front or rear (sometimes both) gardens to allow for lightwells to be provided. Following this other paraphernalia such as grilles, windows and railings are utilised to allow for light into the basement area, and also to provide safety and security. Care must be taken to ensure that paraphernalia is appropriate and would not result in clutter, specifically in the front garden where such additions can be much more visible. The existing street scene character will be taken into consideration for basements proposals where paraphernalia will be introduced into the front garden, along with impacts of loss of car parking and existing landscaping. Developments within the setting of a heritage asset or conservation area will need to have regard to policies within the wider development plan.

- 2.4.17 Whilst basement development is an option to extend existing dwellings to provide for more habitable space, self-contained homes will not be supported within basements. Providing adequate light into self-contained homes within basements is often very challenging, whereby resulting in future occupiers not receiving an adequate level of residential amenity. Furthermore, separate units would often result in a separate access door, which can be at odds with the prevailing pattern of development in much of suburbia. Furthermore, an increase in residential units through basement development can place pressure on front gardens to provide for adequate paraphernalia such as off-street carparking, cycle and bin storage, along with soft landscaping.
- 2.4.18 Whilst much of basement development is below ground, associated paraphernalia and in some instances, lighting, ventilation and retaining structures may cause amenity issues to neighbouring properties. Care must be taken to ensure that harm to neighbouring properties is mitigated.
- 2.4.19 Basements by their very nature result in substantial excavation within a property, which can have an impact on ground conditions within the site and also for neighbouring properties. Firstly, new basement development within flood risk prone areas can result in risk to future occupiers, and therefore habitable space / rooms will not be permitted in such locations. Non-habitable space may be appropriate, however may require a suitable pumping device. Similarly, excavation can result in harm to existing trees within the application site, but also within the root protection zone of trees that may be located outside of the application property. The scale of basements should be revised to ensure that nearby trees are not adversely impacted by the development. Basements that potentially impact on existing trees should refer to Policy GI4 (Urban Greening, Landscaping and Trees).
- 2.4.20 Soil stability is a primary concern in relation to basement proposals, however is not a material planning consideration. Building Control should be contacted in relation to soil stability and foundations.

- 2.4.21 All basement development applications must be supported by a Construction Method Statement (at application stage), which will set out how the construction phase will be undertaken, including the removal of soil from the site, mitigating harm to neighbouring amenity such as noise, dust and also screening (where appropriate) from the public realm into a development site. Other matters to be detailed within a Construction Method Statement include (but not limited to); land stability / tanking / structural integrity / tree root protection.

## Policy GR5: View Management

*Linkages:*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*NPPF Chapter 16: Conserving and enhancing the historic environment.*

*London Plan Chapter 3: Design*

*London Plan Chapter 7: Heritage and Culture*

### **Policy GR5 View Management**

- A. The protected views identified in Appendix 3 will be safeguarded in accordance with the Harrow Views Assessment (2024) and Policy HC4 (London Views Management Framework) of the London Plan (2021).
- B. Where there is a protected view:
  - a. Development within a Protected Views Restricted Corridor (shown in red) that exceeds the specified threshold height will be refused; and
  - b. Development in the Protected Views Setting Corridor (shown in yellow) should form an attractive element in its own right and preserve or enhance the viewers' ability to recognise and to appreciate the landmark.
- C. Development should not harm and, where possible, should make a positive contribution to the characteristics and composition of the protected views and their landmark elements. It should also conserve and enhance viewers' ability to recognise and to appreciate important landmarks, in particular St. Mary's Church and Harrow on the Hill, and the Harrow Weald Ridge as seen from designated viewing locations.
- D. Development in the foreground and middle ground of a protected view should not be overly intrusive or unsightly to the detriment of the view, or detract from the prominence of the landmark.
- E. Development proposals in the background of a view should give context to landmarks and not harm the composition of the view as a whole.
- F. Viewing places should be accessible and managed so that they enhance people's experience of the view.
- G. Opportunities to create new local views and vistas should be maximised through the design and layout of new development.

Developments outside of the Opportunity Area, but within a designated landmark viewing corridor (or wider setting consultation corridor) must take into consideration the guidance in the Harrow Tall Building (Building Heights) Supplementary Planning Document (2023).

### Supporting Text:

- 2.5.1 The landscape backdrop provided by the Green Belt, to the north of the Borough, and the profile of Harrow on the Hill with St. Mary's Church to the south of the Borough, are significant components of local identity and sense of place. The topography of the Borough and the prevailing building heights across Harrow's suburban districts are such that views and glimpses of these features can be enjoyed as part of the experience of moving through, or living within, the Borough. Views towards the Green Belt are a reminder of the proximity of Harrow's suburbs to the countryside, and appreciation of the changing seasons, whilst views towards Harrow on the Hill and St. Mary's Church reinforce the historical and cultural importance of that place.
- 2.5.2 Policy GR5 is supported by the Harrow Views Management Guidance (June 2024). which undertook a review of the existing protected views from the Harrow Local Plan (2012). The protected views (both restricted and wider setting corridors) are set out in the policies map. Development proposals will be assessed having regard to this and all other material considerations on a site-by-site basis.
- 2.5.3 Poorly located and designed buildings, and those of inappropriate height, could significantly detract from these views. However, visibility should not be conflated with harm. A truly outstanding design that is well located and designed to inspire the viewer may enhance a protected views setting corridor. Viewpoints should be maintained, and where possible enhanced. Harrow's attractive skyline ridges and landscape features can be enjoyed from vantage points throughout the Borough. New development may provide opportunities to open up new local views and vistas, or to create new landmarks in the townscape; where such opportunities exist, they should be fully exploited through the design and layout of buildings and spaces.
- 2.5.4 Protected views are not only restricted to those identified within the Harrow Local Plan, applicants must also review neighbouring boroughs to ensure any cross-boundary views (into and out of LB Harrow and neighbouring boroughs) are appropriately addressed.
- 2.5.5 Proposals that are located within a Protected Views Setting Corridor and breach the height thresholds, must utilise appropriate 3D modelling software to accurately demonstrate how a new development would respond to its immediate context and to its wider character setting. Following preparation of appropriate plans (including 3D modelling), applicants are required to engage with the Harrow Design Review process. Meaningful engagement with this process will assist in ensuring new development achieves exemplary design as required by the policy, and mitigating harm to the assets sought to be protected by the protected viewing corridors.

### Harrow on Hill, including St Mary's Church



## Policy GR6: Areas of Special Character

*Linkages:*

*NPPF Chapter 11: Making effective use of land*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*NPPF Chapter 16: Conserving and enhancing the historic environment*

*London Plan Chapter 3: Design*

### **Policy GR6 Areas of Special Character**

- A. Proposals affecting an area of special character will be assessed regarding:
  - a. The impact of the proposal upon the strategic value of the area of special character;
  - b. The desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character; and
  - c. The protected views to and from areas of special character.
- B. Proposals that would realise sustainable opportunities for increased appreciation of, or public access to, areas of special character will be supported.
- C. Proposals that would substantially harm an area of special character, or its setting, will be refused.

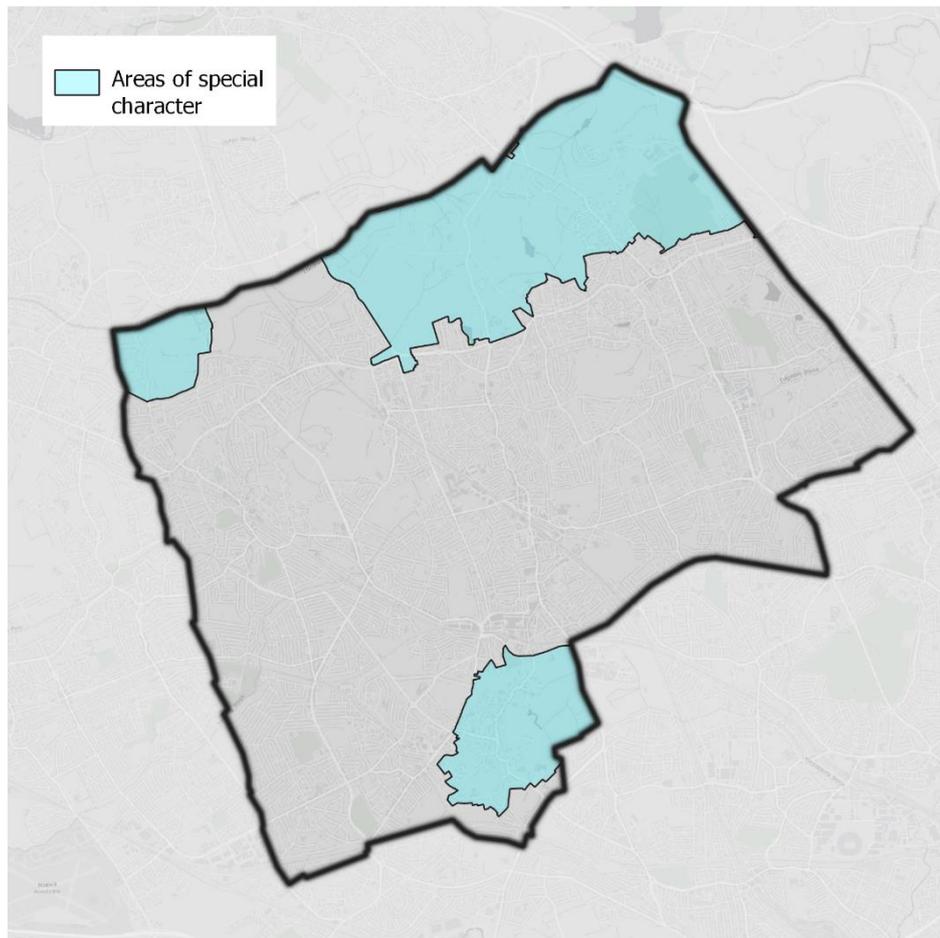
### **Supporting Text:**

- 2.6.1 Rising above the predominantly two storey, suburban development of the central lowland areas, Harrow's areas of high ground are of strategic importance to the character and distinctiveness of the Borough. Pinner Hill and Harrow Weald Ridge provide an elevated horizon of tree cover and open countryside which spans across the north of the Borough and acts as a visual reminder that Harrow is an outer-London borough, a transition between the highly urbanised characteristics of central & inner London and the more rural character of the counties beyond. Harrow Hill is a topographical feature with an identifiable profile to the south of the Borough, forming the verdant 'shoulders' upon which sits St. Mary's Church and supplemented by a substantial body of open space around the Hill's lower slopes. Harrow Weald Ridge, Pinner Hill and Harrow on the Hill contain a significant number of the Borough's heritage assets. Harrow on the Hill is also of cultural importance as the Borough's principal historic settlement and as the location of Harrow School.
- 2.6.2 Reflecting the strategic importance of these parts of the Borough, the Local Plan retains their designation as areas of special character and undertakes to manage development to maintain their special character. The extent of the areas of special character is delineated on the Harrow adopted Policies Map.

- 2.6.3 The strategic value of the Harrow Weald Ridge and Pinner Hill area of special character is as a significant landscape backdrop that comprises extensive tree cover, including the cumulative contribution of small groups and individual trees, and major open areas. New development must also consider the area of special character extends into Hertsmere Borough Council, and impacts within its administration boundary should be given due regard.
- 2.6.4 The strategic value of the Harrow on the Hill area of special character is the prominence that the Hill provides to the historic hilltop settlement, particularly St. Mary's Church and historic Harrow School buildings, and the setting created by the major open areas, including the cumulative contribution of groups and individual trees. The boundaries of the Harrow on the Hill area of special character take in playing fields and other spaces which form Metropolitan Open Land around the hilltop settlement.
- 2.6.5 As described above, parts of Harrow Weald Ridge, Pinner Hill and Harrow on the Hill provide substantial tree cover and extensive tracts of open and natural land. These areas make a positive contribution to the borough through their relatively low light, air and noise pollution, as well as places for undisturbed habitat formation and wildlife movement.
- 2.6.6 Heritage assets feature in each of the areas of special character. The townscape of Harrow on the Hill is a crucial component of its heritage as the principal, historic settlement in the modern Borough. At Pinner Hill and Harrow Weald Ridge historic farm complexes, cottages, villas and lodges, among other heritage assets, are valuable components of the areas' countryside and rural character.
- 2.6.7 The value of protecting the Borough's areas of special character, and their features, is diminished if they cannot be seen and appreciated from within the urban and suburban environment.
- 2.6.8 In order to manage Areas of Special Character, a thorough understanding of the potential impacts of development must be understood. Applications must be supported by a Townscape and Visual Impact Assessment (TVIA) carried out by a suitably qualified professional and be in accordance with the Guidelines for Landscape and Visual Impact Assessment (Third Edition) (or any superseding guidance). However, to address any heritage assets and potential impact, a Heritage Impact Assessment (HIA) must also be undertaken where appropriate.
- 2.6.9 There are already many opportunities for residents and visitors to access and enjoy areas of special character. The London Loop strategic walking route passes through Pinner Hill and Harrow Weald Ridge, whilst the Capital Ring is routed through Harrow on the Hill. Bentley Priory Open Space, Stanmore Country Park and Stanmore Common all provide opportunities for the appreciation of the natural environment in Harrow Weald. The extension to Stanmore Country Park, known as Wood Farm, has been delivered over the previous plan period. This asset both increases public access to land within the Harrow Weald area of special character and provides a new, public viewpoint towards Harrow on the Hill and central London.

2.6.10 Policy HE1 (Heritage Assets) includes requirements relating to Local Areas of Special Character. These are distinct from Areas of Special Character by virtue of their scale and character. Areas of Special Character reflect the overall structure of the borough with respect to the distinction between suburban / urban built up areas and the elevated, more rural and / or historic landscapes and the views they offer to and from them. Local Areas of Special Character on the other hand are more modest in scale, being areas of heritage, architectural, townscape and landscape value at a local, more internalised level.

### Areas of Special Character



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## Policy GR7: External Lighting

*Linkages:*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter 3: Design*

*London Plan Chapter 5: Social infrastructure*

### **Policy GR7 External Lighting**

- A. New development should incorporate appropriate external lighting and be designed to mitigate wider harm. Lighting should be:
  - a. appropriate for its purpose and its setting;
  - b. demonstrated to minimise the level of illumination required, glare, angle and light trespass, particularly to mitigate any harm to sensitive receptors such as residential properties, natural habitats and biodiversity (such as priority habitats, species, protected sites, rivers and their corridors), and
  - c. assist in achieving a high standard of secure by design.
  
- A. Proposals for floodlighting will be supported where it would enhance sporting facilities and would not be detrimental to the character of the open land, the amenity of neighbouring occupiers nor harmful to biodiversity.

### **Supporting Text:**

- 2.7.1 External lighting can be an important element of new development, depending on its scale and purpose. However, poorly thought out, designed and managed external lighting can result in light nuisance. A lighting strategy for new development should be prepared, which details the requirements of the proposed use and any impacts on the wider area. External lighting that utilises illumination that is significantly brighter than need be for its use, in conjunction with height and angle can lead to light trespass and nuisance to adjoining properties. Specifically, sensitive receiving environments such as residential properties can have their amenity harmed by light trespass due to insufficient cowlings or poor angling of lights.
- 2.7.2 Biodiversity and natural habitats can often be sensitive to external lighting where it is poorly designed, in terms of its illumination, siting and angle of lighting. New development must consider any impacts on existing biodiversity within the site, and specifically to lighting, biodiversity that is located adjacent and nearby to the site.
- 2.7.3 The council will consider the use of appropriate conditions post permission to restrict additional lighting to developments, where this is considered appropriate and necessary to protect amenity, biodiversity and the historic environment. Where lighting is within the setting of a heritage asset, a HIA

should be prepared to address any such harm and where necessary mitigation measures.

- 2.7.4 External lighting plays a crucial role in ensuring Secure by Design for new developments, specifically where large-scale developments are delivered with larger areas of public realm. Appropriate levels of external lighting, in conjunction with high quality design, assist in ensuring that people feel safe. Appropriate lighting strategies will ensure that developments are satisfactorily lit to provide clear lines of sight and that there are no darkened locations which may give rise to safety concerns.
- 2.7.5 Policy S5 Sports and recreation facilities of the London Plan provides support for floodlighting within reasonable hours, where there is an identified need for sport facilities, and lighting is required to increase their potential usage, unless it would give rise to demonstrable harm to the local community or biodiversity. Proposals within or close proximity to Green Belt, Metropolitan Open Land, and Open space must consider these as areas of less light source, and that proposals would not harm this context or areas of biodiversity interest. Sport England's Artificial Sports Lighting Guidance can be found at <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-andcost-guidance/artificial-lighting>.
- 2.7.6 In determining the appropriateness of external lighting, the Council's Environmental Health Department will appraise lighting strategies submitted with planning applications to determine their appropriateness. Applicants should refer to the Institution of Lighting Professionals; Guidance Note 01/21 (The Reduction of Obtrusive Light) or any subsequent iteration.
- 2.7.7 New lighting proposed as part of any new development should seek to ensure the use of energy efficient fixtures to assist with climate change and the requirements set out in Strategic Policy 08 (Responding to the Climate and Nature Emergency).

## Policy GR8: Shopfronts & Forecourts

*Linkages:*

*NPPF Chapter 7: Ensuring the vitality of town centres*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter 3: Design*

### **Policy GR8 Shopfronts & Forecourts**

- A. Proposals for shopfronts including blinds, canopies, front extensions and development on forecourts will be supported where:
- a. They provide an active frontage and are of a scale and proportion appropriate to the host building, architectural character and the wider character of the area in which it is located;
  - b. They do not obstruct or adversely affect pedestrian or highway safety, particularly for users with visual impairment or impaired mobility;
  - c. They would conserve and enhance the significance of heritage assets;
  - d. The shopfront would provide all-abilities inclusive access;
  - e. The illumination of shopfronts and forecourts would not detrimentally affect the amenity of neighbouring occupiers, or the significance of heritage assets;
  - f. The proposal involves the installation of a new or replacement shopfront, the use of toughened glass will be required; and
  - g. Awnings or canopies are retractable and fold away discreetly when not required outside of operational hours. Reinstatement of traditional awnings or canopies that were historically part of the shop would be supported.
- B. Advertisements for shopfronts must accord with the requirements set out in Policy GR9 (Outdoor Advertisements, digital displays and hoarding) and any supplementary planning documents, specifically in relation to Conservation Areas.
- C. Where security shutters are proposed they should be of an open mesh design and, wherever possible, should be located internally.
- D. Tables, chairs and other ancillary paraphernalia on forecourts will be considered on a case-by-case basis and must:
- a. Ensure the frontage does not appear cluttered within the streetscene;
  - b. Ensure the pedestrian thoroughfare is not obstructed, allowing for the free flow of pedestrians, including those with disabilities.
  - c. Ensure that highway safety is not compromised; and
  - d. Only be used during hours that are appropriate for the centre within which they are located.

## Supporting Text:

- 2.8.1 For many pedestrians and shoppers, the ground floor frontages of buildings provide the principal perception of the quality of the built environment in town centres and neighbourhood parades. Well designed, practical shopfronts can make a positive contribution to the townscape and success of the Borough's shopping areas.
- 2.8.2 Both individually and cumulatively, minor development such as shopfronts, security shutters and canopies can influence perceptions of the accessibility and security of an area and visually impact the street scene. A proliferation of solid security shutters create a fortress-like atmosphere in town centres and neighbourhood parades when premises are closed, perpetuating fear of crime and personal safety. Shutters with a transparent 'open mesh' design help to maintain visual interest and, along with a mix of appropriate town centre uses, help to enliven town centres during the evening.
- 2.8.3 Outdoor dining provides an opportunity for small businesses to increase their turnover and assists in enlivening a streetscene whether in a town centre or a small parade.
- 2.8.4 The installation of new shopfronts, including those that replace existing shopfronts, provides the opportunity not only to improve the appearance of the streetscene but to design-in safety and security features including toughened glass in preference to shutters to improve the safety and security of ground floor units. Opportunities to repair or reinstate historic shopfronts have the potential to conserve or enhance heritage significance, as well as deliver wider public benefits in terms of sense of place, local distinctiveness, etc.

## Edgware Road



## Policy GR9: Outdoor Advertisements, digital displays and hoardings

*Linkages:*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter 3: Design*

*London Plan Chapter 10: Transport*

### **Policy GR9 Outdoor Advertisements, digital displays and hoardings**

- A. Proposals for advertisements on buildings and freestanding units will be supported where:
- a. They do not adversely affect the visual amenity of the area;
  - b. They do not adversely affect the amenity of residential occupiers by reason of siting, illumination or noise;
  - c. They are appropriate in scale and illumination to the location and, in the case of advertisements on buildings, the host building;
  - d. They contribute to rationalising street clutter and help to achieve an inclusive, legible environment;
  - e. They contribute to the safety of the environment for pedestrians, cyclists and drivers;
  - f. They do not impede any existing or proposed surveillance equipment, and contribute positively to public perceptions of security;
  - g. They do not adversely affect the amenity of any residential or sensitive area;
  - h. Advertisements associated with Wi-Fi or telecommunication infrastructure must be proportionate to the overall structure, and must not lead to an over proliferation within the locality;
  - i. Advertisements associated with electric car charging stations must be proportionate to the to the overall structure, and should only relate to the charging station service provider. Where advertisements vary from the service provider, proposals must comply with a - g above.
- B. Advertisement hoardings will be appropriate in non-residential areas where they screen vacant or derelict sites, or sites where development is imminent.
- C. Proposals for advertisement resulting in a cluster of hoardings will be resisted where there would be a cumulative impact upon amenity.
- D. Proposals for advertisements that advertise temporary events and markets in centres will be supported.

### Supporting Text:

- 2.9.1 Well designed and considerately located, commercial advertisements add to the interest and vibrancy of town centres and other commercial areas. Advertisements can also be used to identify uses and occupiers within a building or area and can contribute positively to the legibility of the urban environment. However, over-sized, insensitively sited and inappropriately illuminated advertisements can be unsightly, detract from the character of an area and run counter to the creation of safe, accessible environments. Applicants should consider guidance set out by the Advertising Standards Authority in the context of the imagery or text that they wish to advertise.
- 2.9.2 Advertisements within residential areas or at the interface of commercial and residential areas can adversely affect the amenity of the residential area. Advertisements which are illuminated or emit noise, such as those which provide a moving display, have considerable potential to cause nuisance to residential occupiers. In the more commercial context of town centres, illuminated and moving display units are to be expected, but can nevertheless adversely impact residential premises above ground level.
- 2.9.3 In determining the appropriateness of any illumination, the Council's Environmental Health Department will appraise lighting strategies submitted with planning applications to determine their appropriateness. Applicants should refer to the Institution of Lighting Professionals; Guidance Note 01/21 (The Reduction of Obtrusive Light) or any subsequent iteration.
- 2.9.4 Freestanding advertisements frequently add to street clutter and obstructions in the public realm. The Council's preference is for such advertisements to be integrated with the provision of required street furniture, like bus stops or telephone boxes. Free standing Wi-Fi and USB charging docking may be located in town centres and parades. These developments often appear secondary to the internally illuminated advertisement component associated with them, and can appear as incongruous additions to the locality. Care must be taken to ensure an appropriate balance between the primary infrastructure and the ancillary advertisement element. Furthermore, there should not be an over proliferation of such developments, specifically in the context of all other street furniture, which can lead to excessive street clutter.
- 2.9.5 Electric vehicle charging stations are becoming more frequent in the public realm. Care must be taken to ensure that the opportunity to use individual charging stations to host advertisements, does not lead to an over proliferation of advertising. Proposals for advertisements should be proportionate to the charging station and advertise the service provider only.
- 2.9.6 Areas that are sensitive to advertisements include the Green Belt, Metropolitan Open Land, other open space, Areas of Special Character, conservation areas, and local areas of special character. Listed buildings (including locally listed buildings) are also sensitive to advertisements, and the act of fixing the advertisement may require listed building consent.

- 2.9.7 Occasional street markets and other temporary events help to enliven and support the Borough's town centres. By their nature, such activities require local advertising to raise awareness of the time, location and nature of the market or event, and therefore to ensure that they are successful. Certain forms of advertising for temporary events benefit from 'deemed consent' as defined in the Town and Country Planning (Control of Advertisements) (England) Regulations (2007) and do not, therefore, require an application for advertisement consent.

## Policy GR10: Infill and backland sites, back gardens and amenity areas

### Linkages:

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*NPPF Chapter 12: Achieving well-designed and beautiful places*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy GR10 Infill and backland sites, back gardens and amenity areas**

#### *General*

- A. Proposals on Infill, backland sites, [non-designated] open space, garden land and garage sites will only be acceptable where:
- a. The proposal would be a high-quality design of a scale and intensity appropriate within the context it is located in.
  - b. Proposals assist in the delivery of homes as demonstrably needed [Strategic Housing Policy 03].
  - c. Neighbouring amenity is protected in terms of access to daylight, sunlight and actual or perceived privacy, in accordance with Policy GR1.
  - d. Ensure a satisfactory quantum and quality of landscaping to provide for amenity space and biodiversity enhancements.
  - e. Appropriate levels of car parking is provided in line with Policy M2 commensurate to the scale of development, with servicing and refuse collection adequately addressed.
  - f. The proposal is accessible to all.
  - g. Addresses any relevant supplementary guidance.

#### *Infill Sites*

- B. Proposals for gap sites located in an established street scene will be supported where they:
- a. Demonstrate compliance with A (a-g) above;
  - b. Ensure sufficient private garden / amenity space is provided for both the proposal site and any donor property; and
  - c. Satisfactory servicing, waste and cycle storage is provided.

#### *Backland Development*

- C. Proposals that are located on backland sites will be supported where they:
- a. Demonstrate compliance with A (a-g) above;
  - b. Provide satisfactory access to the development;

- c. Ensure appropriate waste servicing can be provided; and
- d. Ensure secure by design measures have been addressed.

#### *Non-designated open space*

- D. Proposals for new housing on non-designated open space will be supported where they;
  - a. Demonstrate compliance with A (a-g) above;
  - b. Ensure highway safety is maintained; and
  - c. Address any relevant supplementary guidance.

#### *Garden land*

- E. Proposals for new housing on rear gardens will be resisted unless they;
  - a. Demonstrate compliance with A (a-g) above; and
  - b. Form part of the comprehensive development of a number of plots.

E.1 Housing on individual rear gardens will not be supported.

#### *Garage sites*

- F. Proposals that seek to redevelop garage sites within a development will be supported where they:
  - a. Demonstrate compliance with A (a-g) above; and
  - b. Satisfactorily demonstrate the loss of garages will not cause or exacerbate parking pressure within the surrounding network.

### **Supporting Text:**

- 2.10.1 Across outer London there are numerous opportunities to deliver appropriate small site housing developments, which are able to contribute to delivering housing needs for the borough. Development opportunities can exist on sites that constitute infill, back land sites, [non-designated] open space, garden land and garage sites. Much of the suburban area in Harrow is made up of 2-storey residential homes with rear gardens that provide amenity space for residents and biodiversity habitat.
- 2.10.2 Residential gardens are a strong element of suburban character and are an important component of the quality of life enjoyed by many Harrow residents. Development in these areas requires careful management to ensure this character is respected. However, character across the borough will continue to evolve over time, which will include the gentle densification of suburbia. Furthermore, the borough will continue to face pressure to deliver against its housing target set for it in the London Plan, but also to deliver the right type of homes that Harrow residents need.

- 2.10.3 The National Planning Policy Framework (2023) (paragraph 70) states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and such developments are able to often be built-out relatively quickly. The London Plan (2021) Policy H2 (Small sites) sets out that boroughs should recognise that character evolves over time, and that small sites can provide a valuable contribution to meeting housing targets. The Plan sets a small site housing target of 375 homes per year for Harrow; this forms a component of the overall target of 802 homes per year.
- 2.10.4 The Council will seek to encourage appropriate opportunities to achieve the requirements as set out in Policy H2 (Small sites) of the London Plan (2021) which encourages development in locations well serviced by public transport and amenities. Small sites development must comply with policy H03 (Optimising the use of small housing sites) of the Local Plan. The Council will look to progress previously commenced work in relation to small sites within Harrow, specifically in relation to outcomes of the Small Sites: Capacity Study (2022) and subsequent Design Code / guidance work. Any design work will look to assist in the delivery of small site developments by providing clarity and certainty around design requirements.
- 2.10.5 Small site development outside of the sustainable areas identified in policy H03, will be less acceptable.
- 2.10.6 The prevalence of detached, semi-detached and terrace style housing provides a character of family homes across the borough from both a visual and use perspective. This character must be considered in any development application. Local Plan Policy GR1 (Delivering high quality design in Harrow) must also be addressed as any new development.
- 2.10.7 Infill, back land sites, [non-designated] open space, garden land and garage sites are often constrained sites and in close proximity to existing residential properties. Proposals must be creatively designed to ensure that whilst new development respects the character of a location's context, is also ensures that window placements protect the amenity of existing and future occupiers. New development should also ensure that new homes and their respective amenity outdoor amenity space is accessible for a range of users. Amenity space must be useable and functionable appropriate for future occupiers.
- 2.10.8 Local Plan Policy GR1 (Achieving a High Standard of Development Design and Layout Considerations) must also be addressed as any new development.
- 2.10.9 Infill sites are often represented by a gap within a strong pattern of development, where housing fronting a road appears very uniform. However, within a uniform street scene, vacant sites within the row can appear as an anomaly. These gap sites may occur where houses were never built, or the street was impacted by historical bomb damage. Other gaps may arise from irregular plot shapes or very large gardens. These sites represent an opportunity to infill a logical gap within the street scene.
- 2.10.10 Backland sites are generally vacant plots of land that are located between rear property boundaries or properties facing away from each other onto opposing

street frontages. These sites are often accessed through a single access lane running down the flank elevation of two properties facing onto a street, which can cause access issues for construction, servicing and private vehicles. Applications must set out how access and servicing will be undertaken in a satisfactory manner, ensuring secure by design and pedestrian accessibility is also safeguarded.

- 2.10.11 Residential properties with individual rear gardens are a predominant characteristic, where any built development is of a single storey and ancillary in use to the main residential dwelling on the site. Individually, new development that exceeds this height and / or is independent use of the principal residential use of the site, has a detrimental impact on the use of the property and the character of the area. The Council discourages ad hoc planning applications to individual rear gardens, which can lead to incremental erosion of suburban character.
- 2.10.12 Where site assembly has been secured and a number of rear gardens propose a comprehensive development, subject to compliance with any subsequent Small Sites Design Code / SPD and this policy, they may be supported. What constitutes a comprehensive development in terms of the number of sites, will be determined on a case-by-case basis. This will be assessed by the scale of development (number of units) and the overall site size, as this will determine the impact that a development is likely to have on the wider area and the planning benefits it would have.
- 2.10.13 Numerous housing estates and flatted departments have communal garages within their wider site. These sites are often dated with garages no longer fit for purpose. In many circumstances, garages are now used for general storage for the residential properties. Applications for demolition of garage sites and new residential development must satisfactorily demonstrate that the garages are not in use as car parking spaces, and that their loss would not exacerbate parking pressures in the area. Numerous garage sites within housing estates, are often set within designated open space, for which there is presumption against any net loss. New development within housing estates where the open space is designated, should also refer to Local Plan Policy HO5 (Housing estate maintenance, renewal and regeneration).
- 2.10.14 Non-designated sites are often publicly accessible, and form what appears to be a left-over piece of land at the end of a row of houses, which was never initially built on as part of a development. Such sites are not prevalent across Harrow, but often appear between the end of row and the back kerb of a highway. New development in close proximity to the highway, must demonstrate that highway safety is maintained in terms of access to and from the highway and appropriate site lines are maintained.

## Policy GR11: Planning Obligations

*Linkages:*

*NPPF Chapter 4: Decision making*

*London Plan Chapter 11: Funding the London Plan*

### **Policy GR11 Planning Obligations**

- A. Planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes, and to ensure that all relevant development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Relevant infrastructure may include matters (but not limited to) such as public transport, health, counter-terrorism and public realm improvements.
- B. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

### **Supporting Text:**

- 2.11.1 The Harrow Community Infrastructure Levy (CIL) will ensure that new development helps to fund the cost of new or enhanced strategic infrastructure to support the cumulative impacts of development across the borough. The list of the types of infrastructure to be funded by CIL is set out in the annual infrastructure funding statement available on the Council's website, such as schools, libraries and healthcare.
- 2.11.2 A proportion of total Harrow CIL receipts is allocated to fund projects that reflect the priorities within the area in which Harrow CIL was received ('Neighbourhood CIL'). The Council will work with relevant stakeholders to identify local priorities for the spending of NCIL.
- 2.11.3 The Council has produced an Infrastructure Delivery Plan as part of the Local Plan review, and this evolving document will form the basis for infrastructure and funding priorities across the plan period (2021 to 2041). Regard will also be given to other infrastructure related strategies, such as the Harrow Long Term Transport Strategy (LTTS), Local Implementation Plan (LIP) and Harrow Indoor and Outdoor Sporting Facilities Strategy (as examples).
- 2.11.4 Where new development requires a bespoke mitigation to make a scheme acceptable in planning terms, the Council may enter into a legal agreement with a developer. A legal agreement would take the form of a S.106 agreement, where an obligation will be secured on a specific matter. However, the nature of site-specific impacts means they vary widely depending on the site, its local context, and the development proposed. Therefore, beyond the requirements for affordable housing, it is not possible to ascribe a set of circumstances under which certain types of obligations will be sought as a norm. Obligations can take the form of monetary contributions or non-monetary contributions (such as those relating to employment and training provision, travel plans, design quality, biodiversity net gain monitoring etc).

Where considered a requirement a S.106 obligation may be secured for public transport for improvements to infrastructure such as transport services, stations, junctions/roads or infrastructure to provide increased capacity or improved accessibility. or to contribute to new public realm. Similarly, S.106 contributions towards walking and cycling infrastructure or the wider public realm may also be required from developments to meet the Mayor’s Healthy Streets Approach or to address deficiencies identified through an Active Travel Zone Assessment. Applicants should refer also to Policy GR 3 (Public Realm and Connecting Places).

- 2.11.5 The Council will produce guidance to set out how any monetary obligations would be calculated and the form of non-monetary obligations, which will be published on the Council website. This will be updated on a regular basis to reflect up to date charging appropriate for each monetary contribution type. Consistent with the NPPF, the cumulative impact of planning obligations will be set at a level that does not render development unviable within the borough.
- 2.11.6 All new development must consider the obligations as set out in the local plan, including relevant policies, CIL and S.106 obligations when developing a scheme. Any financial contributions must be considered at an early stage by developers, and form part of a scheme viability consideration.

## Policy GR12: Site Allocations

*Linkages:*

*NPPF Chapter 3: Plan making*

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 7: Ensuring the vitality of town centres*

*NPPF Chapter 11 Making effective use of land*

*London Plan Chapter 1: Good Growth*

*London Plan Chapter 2: Spatial Development Patterns*

*London Plan Chapter 3: Design*

### **Policy GR12: Site Allocations**

- A. The Council will work with stakeholders (including utilities) to bring forward the site allocations identified in this plan (see Chapter 11). This will include helping to unblock any barriers in relation to land assembly, site constraints and necessary infrastructure.
- B. The Council will use (or facilitate the use of) compulsory purchase powers to assemble land for development where:
  - a. Landowners and developers can demonstrate that they have:
    - i. a viable, deliverable and policy compliant scheme; and
    - ii. made all reasonable attempts to acquire, or secure an option over, the land/ building(s) needed, through negotiation.
  - b. Comprehensive redevelopment of the assembled site is in the public interest; and
  - c. The development proposed for the assembled site would contribute to the delivery of homes, non-residential uses appropriate for their location, and necessary infrastructure objectives.
- C. Where compulsory purchase is necessary, applicants will be required to demonstrate how the associated costs impact upon development viability.
- D. Applicants must demonstrate all reasonable efforts have been made to assemble sites where adjacent properties would assist in site optimisation and a more efficient use of land.
- E. Any development that would prejudice the optimal delivery of a site allocation, or frustrates the delivery of a neighbouring site, will be resisted.

## Supporting Text

- 2.12.1 Compulsory Purchase Orders provide powers which enable local planning authorities to purchase land compulsorily and associated regulations give effect to the use of these powers. The statutory arrangements for compulsory purchase are lengthy, and there are provisions for appeal and compensation.
- 2.12.2 Paragraph 125 of the National Planning Policy Framework (2023) states that *‘Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.’*
- 2.12.3 Compulsory purchase powers exist to support the development of land in the public interest and are a tool of last resort. All reasonable efforts to assemble sites and deliver a policy complaint scheme should be explored prior to consideration of progressing a compulsory purchase.
- 2.12.4 A comprehensive approach to development will often be in the public interest within Harrow, and often make a more efficient use of land than incremental or ad hoc development. Whilst incremental or ad hoc schemes might be more easily delivered, the constraints posed by site boundaries, neighbouring development or uses and below-ground services all have potentially limiting consequences for scale, layout and viability. Such consequences could depress the efficient use of land, the proper planning of development (in terms of layout, design, use etc) and the ability of development to support the provision of community infrastructure.
- 2.12.5 Whilst site assembly might in principle be in the public interest, the Council will also need to be satisfied that the development proposed upon the assembled site is an acceptable scheme that contributes to the delivery of the Local Plan objectives. Achieving site assembly can result in schemes optimising land more efficiently, and can help to bring more land forward for meeting development needs and/or secure better development outcomes. Where incremental development sites come forward, evidence of discussions with adjoining sites available for development must be demonstrated. Whether a scheme comes forward incrementally or comprehensively, proposals should demonstrate site optimisation in accordance with Policy D3 (Optimising site capacity through the design-led approach) of the London Plan (2021) and Optimising Site Capacity: A Design-led approach London Plan Guidance (LPG).
- 2.12.6 Whilst incremental development will be supported where appropriate, the Council must be satisfied that new development would not prejudice neighbouring potential development sites coming forward. This includes both allocated site and non-allocated sites. Proposals must demonstrate that notwithstanding the acceptability of a scheme within a development site,

neighbouring sites are able to be delivered in an optimal and holistic manner and not be frustrated by way of design parameters of neighbouring developments.

- 2.12.7 The Council will expect all costs incurred in the use of its compulsory purchase powers to be borne by the developer. In the event that the Council is not satisfied with the relationship between the costs of compulsory purchase and scheme viability, co-operation in the use of its powers will be withdrawn.
- 2.12.8 Developments within Harrow Town Centre involving sites being taken forward either incrementally or where site assembly is proposed, must take into consideration the Harrow Town Centre Masterplan once published.



## Chapter 03: Historic Environment

## Strategic Policy 02: Harrow's Historic Environment

*Linkages:*

*NPPF Chapter 16: Conserving and enhancing the historic environment*

*London Plan Chapter 3: Design*

*London Plan Chapter 7: Heritage and Culture*

### **Strategic Policy 02: Harrow's Historic Environment**

- A. The Council will adopt a significance-based approach to the management of the historic environment and seek to conserve and enhance the significance of both designated and non-designated heritage assets. The Council will ensure that the council delivers a positive strategy for the conservation and enjoyment of the historic environment by:
- a. Determining applications in accordance with the National Planning Policy Framework the London Plan, and Local Plan policies HE1 (Heritage Assets) and HE2 (Enabling Development) where proposals affect heritage assets.
  - b. Promoting the significance of the heritage assets within the borough which provide important wider social, cultural, economic and environmental benefit.
  - c. Where necessary, support restoration schemes and changes of use where they comply with (a) above and secure the long-term future of the asset. The Council will work with Historic England and relevant stakeholders to identify nationally important Heritage at Risk and, where within the power of the council, to address the issues placing them at risk
  - d. Continuing to identify and review non-designated heritage assets for statutory or local designation
  - e. Ensuring that new development within the local strategic views (as set out within the policies map) do not harm views to St Mary's Church spire on Harrow on the Hill and other identified assets.
  - f. Supporting developments that improve access to, and the understanding of, a heritage asset where the significance of the asset is conserved and enhanced;
- B. The deteriorated state of the heritage asset should not be taken into account in any decision where evidenced, neglect of, or damage to, a heritage asset
- C. Support integrated management measures to heritage assets to mitigate and adapt to climate change, environment and nature where appropriate, where these are able to be undertaken sensitively, whilst not harming the significance of the heritage asset.
- D. Prior to any development a record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact must be undertaken and made publicly available.

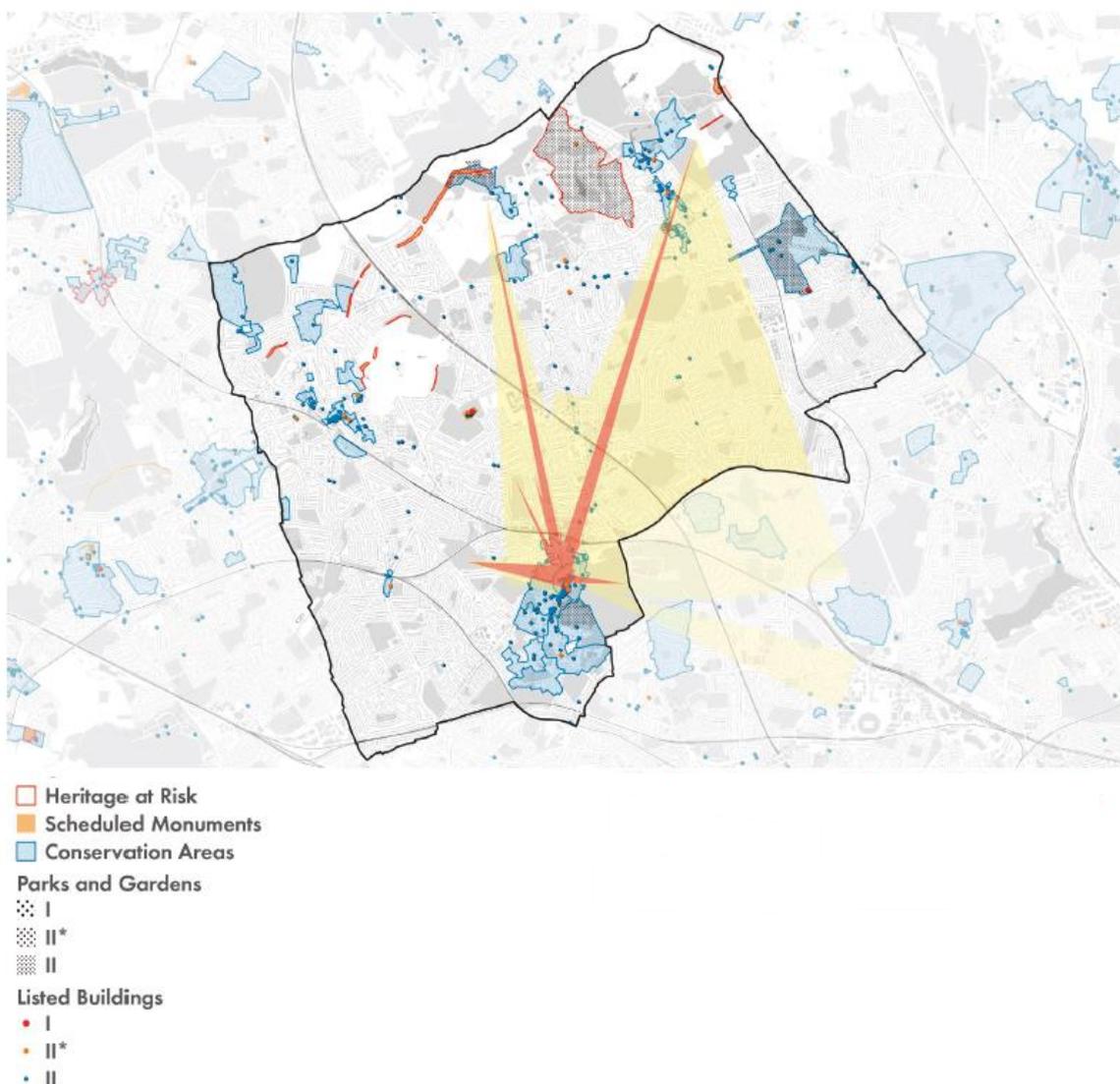
## Supporting Text:

- 3.0.1 Harrow's built heritage is principally found in clusters around its medieval town centres and historic landscapes. Early settlements such as Edgware, Pinner, Stanmore and Harrow on the Hill are protected by Conservation Areas and with many Statutory Listed Buildings, forming networks of assets along on key routes into and out of central London. Landscape is intrinsic to Harrow's strategic character with protected views to and from St Mary's Church in the south and Harrow Weald in the north. It is also important at the local scale, with the mature landscape of woodland and vegetation shaping a strong sense of place in Hatch End, Clamp Hill and Bentley. 20th century Modernist and Art Deco assets also conserve and enhance local character, often acting as a counterpoint to the typical Metroland vernacular. These are typically civic and leisure uses such as London Underground stations, libraries and cinemas that are nestled into neighbourhoods.
- 3.0.2 Harrow's identified heritage assets and historic environment will continue to be valued, conserved and enhanced. New development should consider the unique heritage assets within the London Borough of Harrow, and where appropriate, draw on the contribution of such assets to inform the character of a place and new development within it. Regeneration opportunities of heritage assets that are currently on the Heritage At Risk register should be considered, as they provide an opportunity to contribute to regeneration and place-making. The Council will work with key stakeholders in this respect.
- 3.0.3 The National Planning Policy Framework and the London Plan (2021) both provide further policy and guidance on heritage assets and the important contribution they make to place and people. Planning applications that have an impact on heritage assets (including designated, non-designated, and archaeological sites) must demonstrate compliance with wider development plan policies.
- 3.0.4 The Council will support the restoration of heritage assets to ensure a viable use and the securement of the long-term future of the asset. This must be to a use and scale of intensity that is appropriate for the property, and any proposal must also demonstrate. The Council will continue to work with strategic partners to ensure up to date evidence on heritage assets is maintained.
- 3.0.5 Heritage assets that fall into disrepair through lack of maintenance can lead to significant degradation of an asset. Where appropriate, the Council will work with partners to list these on the Heritage at Risk Register. Similarly, where appropriate and in the public interest, the Council will pursue enforcement action in relation to the condition of heritage assets. However, the Council will also work to bring these assets back into a viable use, restoring the significance of the asset.
- 3.0.6 All new development should seek to address climate change. Applications that propose climate change mitigation measures (such as renewable energy technology), should seek to ensure the significance of the asset is preserved. Applications for climate change mitigation measures must provide detailed

analysis of the significance of the heritage asset to provide a clear understanding of the significance and any potential harm, an assessment of the proposed measures on the significance of the asset (and any options to mitigate any harm) and what level of efficiency improvements, renewable energy provision or climate adaptation would be delivered.

3.0.7 Enabling development provides an opportunity for alternative uses to be introduced to a site, which may enable a heritage asset to be restored. The Council will support enabling development schemes where the bare minimum of enabling development is delivered to secure the long-term future of the heritage asset and the significance of the heritage asset would be preserved. Developments seeking to progress an enabling development scheme, must also take into consideration national policy and advice set out by Historic England.

### Heritage Assets in Harrow



Source: Harrow Characterisation and Tall Buildings Study, 2021

## Policy HE1: Historic Environment

*Linkages:*

*NPPF Chapter 16: Conserving and enhancing the historic environment*

*London Plan Chapter 3: Design*

*London Plan Chapter 7: Heritage and Culture*

### **Policy HE1: Historic Environment**

- A Proposals that secure the preservation, conservation or enhancement of a heritage asset's significance (including any contribution made by setting), or which secure opportunities for sustainable enjoyment of the historic environment, whilst avoiding and minimising harm to heritage significance, will be supported.
- B Proposals should describe the significance of any heritage assets affected by development including any contribution made by the setting. The impact of proposals on the significance of heritage assets will be assessed through a Heritage Impact Assessment:
- C The Council will use planning conditions and planning obligations where necessary to deliver heritage related public benefit, in particular increasing understanding and appreciation of assets heritage significance by sharing knowledge gain from investigative work and improving access to heritage sites.'

### **Designated Heritage Assets**

#### *Conservation Areas*

- D. In addition to (A) and (B) above, when considering proposals within conservation areas, the Council will:
  - a. Support the redevelopment of sites that detract from the significance, character or appearance of the conservation area; and
  - b. Maximise opportunities to restore lost features or introduce new ones that would enhance the significance, character and appearance of the conservation area.

#### *Listed Buildings*

- E. In addition to (A) and (B) above, when considering proposals affecting listed buildings and their setting, the Council will:
  - a. Maximise all opportunities to secure the future of listed buildings particularly those on the 'heritage at risk' register.

#### *Scheduled Monuments*

- F. In addition to (A) and (B) above, when considering proposals affecting scheduled monuments, the Council will have regard to:
  - a. The relationship of the monument with other archaeology and the wider landscape in which it should be interpreted;
  - b. The condition and management of the monument; and
  - c. The existing and future security of the monument.
- G Major development and change of use proposals affecting a scheduled monument will be required to provide and implement a management plan for the

monument that explicitly sets out the significance of the monument and how it will be sustained.

#### *Archaeological Assets*

H. In addition to (A) and (B) above, when considering proposals affecting an archaeological priority area, the Council will have regard to up to date guidance published by Historic England.

#### *Registered Parks and Gardens (including locally listed parks and gardens)*

I. In addition to (A) and (B) above, when considering proposals affecting the significance of registered and/or locally listed parks and gardens, the Council will:

- a. Ensure that development does not detract from the significance of the park, garden or landscape (including any contribution made by setting); or prejudice its continued operation or future restoration;
- b. Maximise all opportunities to restore lost features and/or introduce new ones that would enhance the significance of the park, garden or landscape; and
- c. Maximise all opportunities to secure the sustainable future of registered and locally listed parks, gardens and landscapes, particularly those on the 'heritage at risk' register.

#### **Non-Designated Heritage Assets**

J. The Council will consider the effects on the significance of a non-designated heritage asset. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be taken.

## Supporting Text

3.1.1 Collectively and individually heritage assets are a unique, irreplaceable resource to be sustained for the present and future generations to understand and enjoy. When assessing proposals affecting heritage assets, including non-designated heritage assets, priority over other policies in the Local Plan will be afforded to the conservation of the assets affected and their setting as appropriate to the significance of the assets. Heritage Impacts Assessments should be undertaken by a suitably qualified professional and should include the following:

- a. Identify and describe the heritage assets potentially affected by the development;
- b. analysis the significance (i.e. heritage values) of the heritage assets potentially affected by the development, including any contribution made by setting to that significance;
- c. describe the impact of the proposal on that significance;

- d. outline a) how to avoid and minimise harm to the significance of impacted heritage assets, and b) any opportunities for enhancing heritage significance.
- 3.1.2 Public access to the historic environment, such as archaeological assets or historic parks and gardens, can support tourism, education and the wellbeing of residents. The Council therefore recognises that change within the historic environment need not be at odds with heritage protection objectives.
- 3.1.3 The National Planning Policy Framework (2023) is clear that justification for substantial harm to (or total loss of) the significance of a designated heritage assets should be exceptional, and wholly exceptional in respect of those of highest grading, and that permission should be refused unless certain criteria are met. Proposals involving less than substantial harm to the significance of designated heritage assets are required to be weighed against any public benefits, whilst proposals affecting non designated heritage assets should be subject to balanced judgements concerning the scale of harm and the significance of the asset.
- 3.1.4 Supplementary planning documents (SPDs) together with accompanying character appraisals and management plans have been published for the Borough's conservation areas. Historic England also produce documents providing guidance on the conservation of heritage assets. The detailed policies and guidance set out in these documents, can provide further material considerations. Further information relating to the significance of these assets such as historic Ordnance Survey maps and the Greater London Historic Environment Record (GLHER) etc can also assist in the understanding of such assets,
- 3.1.5 Heritage Impact Assessments need to be undertaken by competent experts in line with all relevant national, regional and local guidance<sup>5</sup>.

#### *Design & Character*

- 3.1.6 Issues of design, appearance and character are the main considerations for additions and alterations to heritage assets, and new development affecting heritage assets. Replicating a particular style may be less important, though there are circumstances where it would be appropriate. Design should take account of the significance of nearby assets, topography, general character of the area, diversity or uniformity in style of the building and area, construction, materials, detailing, decoration and period of existing buildings and spaces; urban grain; current and historic uses; landscaping; and views (public and private).
- 3.1.7 The existing or original location and layout of heritage assets can make a significant contribution to their historical context and meaning. Similarly, the original use of a heritage asset will often be the most compatible with its character and fabric. Securing the appropriate and viable use of a heritage

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<sup>5</sup> See for example, the GLA Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets: <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance>

asset that is compatible with its character and fabric in the long term is an important part of its conservation. Proposals for below-ground (subterranean) development and modification of internal layouts can also impact upon the significance of heritage assets.

- 3.1.8 The survival of heritage assets is usually best achieved by ensuring that they are supported by viable economic uses compatible with the character and fabric of the asset which secure their repair and on-going maintenance needs in the long term. Appropriate uses can breathe new life into listed buildings and conservation areas, and support opportunities for people to enjoy historic parks and gardens.

### ***Designated Heritage Assets***

#### *Development within Conservation Areas*

- 3.1.9 The redevelopment of some sites within conservation areas may offer the opportunity to remove buildings or other features that detract from the character or appearance of the conservation area. Harrow's Conservation Area Supplementary Planning Documents (and their associated character appraisals and management plans) include provisions for redundant buildings, under-utilised sites and other structures/buildings that detract from the character and appearance of the areas concerned.
- 3.1.10 Some proposals may offer the opportunity to restore lost layouts, views/vistas, landscaping, boundary treatment or other features of significance to the conservation area. Similarly, opportunities may exist through new development to introduce new features. Again, Harrow's Conservation Area Supplementary Planning Documents (and their associated character appraisals and management plans) identify specific opportunities to restore specific features and it is recognised that development may bring unforeseen opportunities for the restoration or creation of new features. A Heritage Impact Assessment must accompany proposals for removal of a feature or for new development within a conservation area.

#### *Listed Buildings*

- 3.1.11 There are over 300 statutorily listed buildings and over 700 locally listed buildings in Harrow. In numerical terms, therefore, listed buildings constitute the largest component of the Borough's historic environment. Particular care is needed to ensure that alterations, extensions and any other development affecting listed buildings does not prejudice their architectural or historic integrity, including that associated with their setting.
- 3.1.12 The Council endeavours to ensure that listed building owners are aware of their responsibilities. Statutory powers allow the Council to step in when listed buildings are seriously neglected. However, positive solutions that provides a viable, long-term future for listed buildings and which prevents them becoming 'at risk' are invariably preferable to the use of legal interventions, particularly in respect of buildings on the heritage at risk register (see paragraph 3.25 below).

### *Non-Designated Heritage Assets*

- 3.1.13 Non-designated heritage assets are locally important assets which can range across a number of assets that include locally listed buildings, locally listed parks and gardens, archaeological priority areas and Local Areas of Special Character (LASC). By reason of the difference in listing, there is a differing level of protection afforded to these assets.
- 3.1.14 Across the borough there are areas of notable value, but do not necessarily achieve Conservation Area status. Notwithstanding this, the contribution they make to the local environment warrants recognition and protection. This is due to their heritage significance as well as their townscape /architecture that is of locally cohesive and well-preserved quality and/or landscape that is of locally distinctive and well-preserved quality. Such areas are designated as Local Areas of Special Character (LASC).
- 3.1.15 Buildings of local interest in Harrow make a special contribution to the architectural and historic identity of the Borough. By inclusion on the Harrow list, the Council is highlighting their local significance to be taken into consideration when making planning decisions which affect them. Within conservation areas, local listing indicates that the building (or group of buildings) is of some significance to the character and appearance of the area. Outside of conservation areas, a building's (or group of buildings') inclusion on the local list demonstrates special local architectural or historical significance meriting retention.

### *Archaeological Assets*

- 3.1.16 Harrow has a rich archaeological heritage. This reflects the geology and topography of the land which attracted early settlers and the Borough's proximity to London, which has dominated trade and governance in Britain since Roman times. The benign nature of the environment and landscape processes in the area has resulted in a legacy of well-preserved archaeological features. However, the greatest threat to archaeological resource has been, and remains, human activity particularly development.
- 3.1.17 Scheduled Monuments are a statutory designation for remains that are recognised as having national importance and are, therefore, safeguarded for their intrinsic value for the benefit of current and future generations. Scheduled Monuments in Harrow make a significant contribution to the Borough's heritage and are the most important sites of archaeological interest. However, Harrow's archaeological heritage includes some sites of more local significance as well as areas where insufficient evidence exists to justify formal scheduling. Locations within Harrow which are suspected to contain below ground archaeological assets, as advised by Historic England, are designated as Archaeological Priority Areas.
- 3.1.18 The Council is committed to securing the conservation and understanding of all historic assets including those of archaeological interest. The Borough's Scheduled Monuments and Archaeological Priority Areas are shown on the Harrow Policies Map and further information about them is available via the

Council’s website. The desirability of preserving a scheduled monument and its setting is a material consideration in the determination of planning applications. The National Planning Policy Framework (2023) establishes a clear presumption against the loss of, or substantial harm to, a scheduled monument and states that any harm to a designated heritage asset, which is less than substantial, must be weighed against the public benefits of the proposal. London Plan Policy HC.1 provides further planning decisions criteria relating to archaeological assets. Locations within Harrow which are suspected to contain below ground archaeological assets, upon the advice of Historic England, are identified on Harrow’s proposal map as archaeological priority areas. A number of these are related to features the subject of formal designation as Scheduled Monuments.

- 3.1.19 Developments where heritage assets of archaeological interest have been identified may be subject to mitigation measures in order to understand the significance of the asset. This might include field investigation or excavation and analysis, dissemination and archiving of results. The Council will also encourage community engagement and involvement in any programme of archaeological work. Any investigation would need to be undertaken in compliance with a written scheme of investigation agreed by GLAAS. All projects in London should comply with relevant Chartered Institute for Archaeologist regulations and guidance, as well as HE’s Guidelines for Archaeological Projects in Greater London. Further information is able to be sourced from the Greater London Historic Environment Record (GLHER), which holds information on heritage assets within the borough.

*Registered Parks and Gardens (Locally Listed Park and Gardens)*

- 3.1.20 Harrow has 4 registered parks and gardens and 19 locally listed parks and gardens (set out within the policies map). These assets are considered to have historical significance as they reflect the landscaping fashions of the day they were established. Proposals that are located within the setting of a registered park and garden (locally listed also) will need to demonstrate it would not detract or harm their significance.

*Climate Change Mitigation and Adaptation*

- 3.1.21 Proposals involving heritage assets can often provide opportunities to reduce their contribution to climate change and to increase their resilience to the anticipated consequences of climate change. Examples include funding of public realm improvements to encourage walking and cycling; sustainable drainage techniques to reduce flooding; the reuse of heritage assets to retain embodied carbon and to minimise the need for new building materials, energy and generation of construction waste. Where appropriate, heritage assets can also be modified to reduce carbon dioxide emissions for example by allowing greater use of renewable energy and options for insulation. Intrusive interventions, such as external mounting of microgeneration technology, can harm significance. The creative adaptation of heritage assets can dramatically reduce the whole-life energy costs and waste impacts that would result from demolition and replacement.

- 3.1.22 Development and uses affecting heritage assets may provide opportunities to better reveal the significance of an asset or for people to enjoy it. Investigation of an asset and documentation of the findings may increase understanding of the history and significance of the asset. It is therefore an exercise of public benefit and so recording may be a requirement for a development, using planning obligations or conditions. Accessibility enhancements and the provision of interpretation facilities could improve levels of local appreciation of ‘hidden’ assets such as below-ground archaeology.

*Public Access to Heritage Assets*

- 3.1.23 Policy HC1 of the London Plan encourages boroughs to include policies for improving access to the historic environment and heritage assets and their settings. Permanent public access, such as that at Bentley Priory Museum, Harrow Museum and Headstone Manor, provide opportunities for residents and visitors to value the architectural and historic value of the Borough’s heritage assets. Public access agreements or other provisions, as part of Planning Obligations or conditions for proposals associated with significant heritage assets, can provide opportunities to increase participation in such events - particularly where participation would widen appreciation of the Borough’s heritage assets within their Greater London context - or secure more permanent public access to the historically or architecturally significant components of the heritage asset.

## Policy HE2 Enabling Development

*Linkages:*

*NPPF Chapter 16: Conserving and enhancing the historic environment*

*London Plan Chapter 3: Design*

*London Plan Chapter 7: Heritage and Culture*

### **Policy HE2 Enabling Development**

- A. Enabling development will only be supported where;
  - a. It is the only viable means of securing the long-term future of the heritage assets affected; and
  - b. The enabling development is the minimum necessary, as demonstrated by robust evidence, to meet the conservation deficit and secure the long-term future of the heritage assets affected.
  - c. The benefits of the proposal outweigh the disbenefits of departing from policy.

### **Supporting Text**

- 3.2.1 The national context for enabling development is set out at paragraphs 84b and 214 of the National Planning Policy Framework (2023). By definition, it is development that does not comply with planning policy and which would not normally be given planning permission, except for the fact that it would secure the future conservation of a heritage asset. It should be a tool of last resort, approved only where the conservation of a heritage asset is secured and the disbenefits of departing from conflicting planning policies are outweighed by the benefits.
- 3.2.2 The council will assess applications for enabling development against Historic England's 'Enabling Development and Heritage Assets: Historic Environment Good Practice Advice in Planning Note 4' (GPA4) and any superseding guidance. In line with GPA4, the council will require the applicant to evidence:
  - (a) The conservation needs of the heritage asset (including demonstrating that the proposed use for the asset is its Optimum Viable Use) and the extent of the conservation deficit.
  - (b) That enabling development is the last resort to meet those needs (which typically includes market testing).
  - (c) That the proposed enabling development is the absolute minimum required to meet the conservation deficit.
- 3.2.3 Even where all the evidence necessary has been provided, the Council will only grant permission if the benefits of the proposal are outweighed by the harm.

- 3.2.4 Full applications, either in the form of a single holistic application or a series of intrinsically linked applications, will be required. Outline and/or multiple applications will not be supported. Applications should be accompanied by a programme of works setting out when each of the components of a development are expected to be delivered, and the Council will ensure delivery of this via planning conditions/obligations and the careful monitoring of works. Conservation of the heritage asset(s) is to be delivered before the enabling development is fully occupied. The level of occupancy will vary from scheme to scheme but will be agreed by the Council and secured through a S.106 legal agreement.

**Bentley Priory Mansion House / Museum (top) and  
enabling housing development (bottom)**





## Chapter 04: Housing

## Strategic Policy 03: Meeting Harrow's Housing Needs

*Linkages:*

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### Strategic Policy 03: Meeting Harrow's Housing Needs

#### Housing delivery:

- 1 The Council will optimise opportunities to deliver a minimum of 16,040 (net) homes during the Plan period (2021/22 – 2040/41), of which at least 8,020 new homes (net) will be delivered between 2019 - 2029 (Policy H1, London Plan), to address the future needs within the most sustainable locations of Borough. Based on current estimates of the Borough housing capacity from all sources, the 10-year housing delivery target will be met.
- 2 The London Plan (2021) includes a target to deliver a minimum of 3,750<sup>6</sup> (net) homes on small sites (below 0.25ha) across the Borough between 2019 -2029.
- 3 The Council will support the delivery of new housing on a range of suitable sized sites, prioritising previously developed land, within the following locations:
  - A. **Harrow and Wealdstone Opportunity Area:** A minimum of 8,750 will be delivered through extant permissions and on allocated sites within the opportunity area.
  - B. **Rest of the Borough:** A minimum of 3,165 will be delivered through extant permissions and on allocated sites across the rest of the Borough.
  - C. **Small Sites:** A minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the Plan and windfalls sites, in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail stations or a Metropolitan, Major, District town centre boundary, providing they are sensitively designed to protect and enhance the character of the Borough, particularly suburban areas.
  - D. **Windfall sites:** Development of new housing on suitable sites (above 0.25ha), not identified within the Local Plan will be supported, provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development Plan.
- 4 New development will be directed towards the locations where infrastructure has the most capacity to accommodate new homes, whilst respecting their local distinctiveness, local character and protecting the borough's physical, natural, historic environment, as well as recognising the most accessible locations (PTAL 3-6) of the Borough will change over time. Development within

<sup>6</sup> NB This is a component of the London Plan 10-year housing delivery target of 8020 homes and not addition to this.

suburban areas that have a low public transport accessibility and limited infrastructure capacity will be of a modest scale and will be required to protect, enhance and re-enforce the unique character of these locations.

### **Housing Choice**

- 5 Development will be expected to provide a choice of housing and deliver inclusive, mixed and sustainable communities to address local and strategic housing needs, across the Borough. This will be achieved through;
- A. **Genuinely Affordable housing:** Over the plan period the Council seek to ensure; at least 50% (8,000) of all new dwellings delivered from all sources of housing supply across the Borough will be genuinely affordable to those in need, based on assessment of local housing costs and incomes, in line with the London Plan. At least 70% of all these will be low cost rented housing and the remainder will be Intermediate products which will be genuinely affordable.
  - B. **Mix of Housing by size:** A strategic target has been set to ensure a minimum 25% (4,000) of all new dwellings delivered are three bed (or more) family sized dwellings across the Borough over the plan period.
  - C. **Specialist older people housing:**
    - a) The housing needs of older people will be met through:
      - i) Prioritising the delivery of new conventional residential accommodation in C3 use class, designed to be adaptable to the varying needs of users over their lifetime, as well as via retrofitting the existing stock.
      - ii) The delivery of specialist older persons accommodation (C3) with different levels of support, and care home accommodation (C2). These should play a supplementary role to conventional C3 housing that are adaptable to the changing needs over time.
      - iii) The delivery of low-cost rented housing within older person accommodation schemes.
    - b) The Council will work positively with providers, to support the delivery of a minimum 980 units of specialist older person accommodation, comprising retirement housing units extra care housing units between 2022- 32, to address the future needs of an ageing population. A total of 200 bed spaces for nursing care will be delivered, to address the needs of the elderly population or those who have serious health issues that require specialist care, between 2022-32. The Council will monitor the supply of additional older person accommodation to address local needs and undertake an updated needs assessment, if necessary:
  - D. **Supported and specialist Accommodation:** The Council will work positively with the relevant authorities such as the NHS and charities, to ensure additional well designed supported and specialist accommodation is delivered, to address the requirements of specific users or groups (particularly marginalised, vulnerable individuals or groups) providing the applicant can demonstrate a need for the proposal. The Council will seek to resist the loss of existing accommodation to other uses, unless the proposal is for re-purposed, enhanced or for re-location of the use and it would comply with other policies in the Plan.
  - E. **Non-self-contained accommodation:** The Council will support the provision of non-self-contained housing such as Houses in multiple occupancy (HMOs),

Hostels, Large Scale Purpose-Built Shared Living (LSPBSL) or Purpose-Built Student Accommodation (PBSA). This is providing:

- a. A need is demonstrated for PBSA, LSPBSL products and the proposal is not situated on a site that has extant permission or is allocated for self-contained housing
- b. Proposals make a positive contribution to housing choice and create mixed and balanced communities.
- c. The level of non-self-contained housing provided does not result in an over concentration of such uses, result in harmful amenity impacts and compromise the delivery of additional self-contained housing to meet the future Borough needs and support mixed inclusive communities.

F. **Self-build and custom build housing:** The Council will support proposals, for self-build and Custom build housing, particularly community led schemes, to diversify sources of housing supply, speed up housing delivery, encourage innovate design and further housing choice to address local needs. Such developments will need to demonstrate compliance with relevant policies of the Development Plan, particularly in relation to the provision of affordable and family sized housing.

G. **Build to rent:** Built to rent proposals will be supported within the Opportunity Area, Edgware Major Centre and District Town Centres. This is providing proposals (i) comply with definition and requirements of London Plan Policy H11 (ii) Support high quality design that protects, respects the Borough's character areas in line with SP1 and GR1. (iii) Support balanced, mixed and inclusive communities

H. **Gypsy and Traveller accommodation:** The Council will maintain the existing provision of Gypsy and Traveller pitches. A total of twelve additional pitches will be delivered between 2022-32. The existing identified needs, and if any additional needs arise, will be addressed within an existing site.<sup>7</sup>

#### **Estate regeneration**

6. The Council will positively work with local communities, existing residents, and other stakeholders to support opportunities that arise for estate renewal and regeneration during the Plan period. This will play an important role to:
  - a. Increase the provision of the right type., size, tenure of housing to address local needs and meet the strategic targets
  - b. Ensure residents have access to additional high quality affordable and family sized dwellings to adequately address the needs of existing and future residents
  - c. Address the causes and impacts of multiple deprivation within them and wider areas (where relevant to the proposed scheme)
  - d. Ensure neighbourhoods and communities benefit from living within high quality environments, with access to communal and other facilities within the estates (if necessary) or wider area, as well as are well designed, safe, inclusive and promote the health and well- being of communities.

<sup>7</sup> NB. This is based on the provisional findings of the GLA Gypsy and Traveller accommodation needs assessment (GTANA) for the Greater London area. The final GTANA document is expected to be published by the end of 2024 and the Borough pitch need figures may be subject to change.

- e. Ensure existing and new residential units achieve high quality design standards
  - f. Promote social interaction, cohesion between the residents to support mixed and inclusive communities.
  - g. Ensure residential accommodation and other facilities are maintained at a decent high-quality standard throughout their life
7. The Council will work with a range of stakeholders to support the delivery of phases 2 and 3 of the Grange Farm Estate regeneration scheme during the life of the Plan. This will deliver an exemplary mixed tenure community, with new residential accommodation built to high quality design and Development Plan housing standards, with a range of housing types and tenures, sizes to address the needs of existing and future residents, particularly for families and local income households who require social rented housing.
- Safeguarding the existing housing stock**
8. Existing self-contained C3 housing will be safeguarded in accordance with London Plan policy. Exceptionally, the net loss of self-contained residential accommodation may be acceptable where:
- A. Sub-standard dwellings would be brought in line with London Plan space standards;
  - B. The proposal is for specialist non-self-contained accommodation (use class C2) to meet an identified local need in accordance with the requirements of Local Plan policy H8;
  - C. De-conversion of flats would create a family size home (3 bed or more)
  - D. Providing social or physical infrastructure to meet an identified local need which could otherwise not be met elsewhere.
  - E. The net loss of existing affordable housing units and floorspace – overall and in terms of social rented housing – will be resisted.
  - F. A change of use from housing to short-stay holiday rental accommodation to be used for more than 90 days a year will be resisted.
- Implementation:**
9. The Council will monitor the implementation of the Plan against the above targets, including through the use of the housing trajectory (Appendix 6) and the monitoring implementation framework (Appendix 2), to address future housing needs and maintain a five-land supply of deliverable sites.

### Supporting Text:

#### *Housing needs and requirement*

- 4.0.1 The Draft Local Plan proposes to adopt a housing requirement/target of 16,040 homes between 2021-41 (being the annualised London Plan target of 802 homes per year over the 20-year plan period), in compliance with the London Plan. The proposed target includes self-contained residential units and non-self-contained residential accommodation, including specialist housing for students and older people in use classes C2, C3 and C4 or sui generis.

4.0.2 It should be noted that the NPPF requires Local Plans to cover a period of 15 years from the date of adoption. It is good practice to produce a Plan covering more than 10 years, as there can be time lag in the delivery of large strategic sites and their supporting infrastructure due to factors such as gaining planning permission, market conditions, access to finance and viability. Therefore, as the Plan is expected to be adopted in 2025, the Plan is proposed to cover a period between 2021-41 (i.e. 15/16 years upon adoption).

**Table H1: Indicative Borough housing supply relative to requirement**

	<b>Totals</b>
<b>Local Plan Housing requirement (2021-41)</b>	<b>16,040</b>
<b>Housing supply:</b>	
Total capacity of sites under construction, excluding proposed allocations (at end of 31/03/24)	1,053
Total capacity of sites with permissions, excluding proposed allocations (at end of 31/03/24) (includes 4 net loss non-conventional pipeline)	535
Estimated indicative capacity of proposed site allocations	8,882
Capacity of small sites windfall allowance (SSWA) (London Plan H2 target). <sup>8</sup>	4,125 <sup>9</sup>
Capacity of housing sites completed between financial years 2021/22 and 2023/24 <sup>10</sup>	1,924
Surplus housing delivered between financial years 2019/20 and 2020/21 (relative to London Plan target of 1,604)	454 <sup>11</sup>
<b>Supply Total:</b>	<b>16,973</b>
<b>Indicative shortfall surplus/shortfall in supply relative to 20-year housing requirement</b>	<b>+ 933 (surplus)</b>
<b>Buffer against the housing requirement</b>	<b>5.8%</b>

4.0.3 The table above shows a snapshot in time (based on provisional housing monitoring data as at 31/03/24) of the potential housing supply and capacity from a range of sources, such as existing permissions, sites under construction, completions (within proposed plan period), and indicative capacity of proposed site allocations that was based on design led work (in line with the Mayors London Plan guidance) and those with extant permission. The proposed site allocations comprise of; new site submissions received through the call for sites or local plan consultation processes, existing

<sup>8</sup> The SSWA is applied from the date the Plan is expected to be adopted (2025) less 5 years (11 years)

<sup>9</sup> This applies a SSWA of 375 homes per annum (x11 years) based on the target included within the London Plan Policy H2

<sup>10</sup> Comprising 537, 643, and 730 homes that were completed over these three years

<sup>11</sup> A total of 2,058 homes (1256 and 802 homes respectively) were delivered in the first two years of the London Plan 10-year housing target but before the Local Plan period. The London Plan target for these two years was 1,604, resulting in an overprovision of 454 homes to be carried forward into the Local Plan period.

allocations carried forward into the new Plan and Council owned strategic regeneration sites. The details of these are included Policy GR12: Site Allocations and site allocation templates are included in Chapter 11. In line with the London Plan and NPPF (para 72), a small sites windfall allowance (SSWA) is included for Plan period, as such sites / windfalls can contribute to the anticipated future supply of housing to meet future needs. The SSWA of 4,125 assumes a total of 375 homes per annum will be delivered on small sites over a eleven year period based on the target included within Policy H2 of the London Plan (2021).

- 4.0.4 In terms of the London Plan ten-year housing target of 8,020 homes (between 2019 and 2029), since 2019, the Council has delivered a total of 3,982 homes during this five -year period at an average of 796 homes per annum (based on the Council's own internal monitoring systems). Sites currently under construction or with permission total 1,588 homes (comprising 1,053, and 535 respectively), excluding capacity of sites proposed for allocations, to avoid double counting (i.e. circa 2400 homes). Adding these figures to the 3,982 homes already completed gives a total of 7,970 dwellings, which means the Council is making good progress to meet the London Plan ten-year target (2019-2029) of 8,020 homes.
- 4.0.5 Furthermore, design led capacity and other evidence has been undertaken to optimise site capacity of the proposed allocations within the most appropriate locations of the Borough, to meet the future housing needs of the area. This considered factors such as the location of the site, local character areas and other relevant development constraints, to meet future needs. This indicates that the proposed site allocations, some of which have extant permission or under construction have an estimated capacity to deliver circa 8,900 homes. The means that the currently identified supply totals 16,973 homes for the plan period, which means the proposed Local Plan site allocations have a potential capacity to meet or exceed the housing requirement of 16,040 homes over the plan period. This provides a buffer of circa 5.8% of housing supply against the housing requirement, to ensure choice, competition between site developers in order to maintain sufficient supply of deliverable sites to meet local needs and mitigate against a future housing market downturn. The Council will continue to work positively with a range of stakeholders to identify the most appropriate sites for allocations, assess their housing capacity and ensure they are deliverable to address the future needs over the Plan period and promote sustainable development. In line with the National Planning Policy Framework, a Local Plan Viability Assessment has been undertaken to assess the potential impact of the proposed affordable housing, other policy requirements and Community Infrastructure Levy on the deliverability of the Local Plan. This indicates the proposed housing allocations identified in the Local Plan are broadly viable and deliverable, particularly within the Opportunity Area that has achieved higher sales values in recent years.

## Policy HO1: Dwelling size mix

*Linkages:*

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO1: Dwelling size mix**

#### **A. Dwelling size mix priorities**

- 1 All developments for conventional residential must provide a good mix of unit sizes, to adequately address the Borough's housing needs, particularly for families, as well as contribute to and support the creation of inclusive and mixed communities. To achieve this, proposals must apply the following sequential approach to housing priorities:
  - i) Ensure a minimum of 25% of all units within a scheme are family sized dwellings (three bedrooms or more) and a higher proportion will be required on suitable sites;
  - ii) the remaining dwelling size mix will be determined on a case-by-case basis having regard to:
    - a. Need to provide an appropriate mix of dwelling types reflecting the most up to date evidence as set out in the Local Housing Needs Assessment (or successor documents) and local housing register;
    - b. Site size and its physical characteristics (including any identified constraints on the preferred housing mix);
    - c. Location of the site, the surrounding context, character (including town centre location) and the Public Transport Accessibility Levels;
    - d. Need to optimise housing output on previously developed land;
    - e. The range of tenures and the extent to which flexibility around the mix of market units could secure the delivery of additional affordable dwellings; and
    - f. Potential for custom-build and community led schemes.
- 2 The smallest 2-bedroom dwellings for both market and affordable homes provide a minimum of 4 bed spaces in accordance with the minimum internal space standards for new dwellings set out in London Plan Policy D6, to ensure flexibility to the changing circumstances of households and avoid overcrowding.
- 3 Development that fails to adequately accord with the delivery of the above requirements will be resisted, unless robust evidence demonstrates it would be unsuitable due to site/design considerations or be financially unviable.

#### **B. Flatted developments**

- 4 Flatted developments will be required to give the highest priority to the provision of accommodation for families, on the lower floors of the scheme, with direct access to a private garden or communal amenity space. These should be well designed to address the needs of family

members who may be disabled and elderly or may have other mobility requirements. Proposals that fail to meet this requirement will be resisted, unless it can be demonstrated that the scheme would result in a poor-quality living environment for families; based on the above criteria.

**C. Housing schemes solely comprising of smaller units**

- 5 Development proposals comprising solely of studios and/or 1 bedroom, 1 person units, or those that will result in an overconcentration of 1- or 2-bedroom units on an individual site, will be resisted unless it can be suitably demonstrated that the housing provision:
- Is in an area with higher Public Transport Access Levels (i.e. PTAL 3-6); and
  - Forms part of a larger development, or is located within an area for which a masterplan has been adopted or endorsed by the Council, which includes provision for a mix of unit sizes, including a reasonable number of family-sized dwellings (3+ bedrooms); or
  - Provides for a balance in the mix of unit sizes in the area; or
  - Is the only housing format deliverable by reason of site size, site configuration or other development constraints, and where a studio unit is proposed.
- 6 An exception to the above (5) will apply to proposals for older person accommodation/other types of occupants with specific needs and it can be demonstrated 1-bedroom units is the most appropriate form of accommodation.

**D. Monitoring**

- 7 The Council's dwelling size priorities will be subject to periodic review and updated when new assessments of housing need are commissioned. Through the Annual Monitoring Report (AMR) the Council will set out progress on delivering these priorities and building the right homes for the next generation. The AMR will assist in informing the Council's consideration of dwelling mix on a site-by-site basis.

**Supporting Text:**

- 4.1.1 Development proposals for new housing will need to demonstrate the proposed size and mix of housing will meet the diverse needs of existing and future households, as well as contribute to and support inclusive and mixed communities. This policy seeks to increase the delivery of new housing through optimising the capacity of previously developed sites, whilst ensuring the right size, tenure and type of housing is delivered in the most appropriate locations. This will help address the needs of the anticipated increase in the population, households and the corresponding demographic changes during the plan period (2021-41). The strategic priority of the Local Plan is to increase the delivery of family accommodation to adequately address local needs. The London Plan (2021) defines family housing as "a dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally having three, four, five or more bedrooms".

- 4.1.2 The key challenge for the Plan is to increase the delivery of family housing that generally tends to be developed at a lower density, whilst balancing this with the requirement to meet London Plan housing targets where a significant proportion of dwellings are assumed to be smaller dwellings. In terms of smaller sized units, the priority is to provide a higher proportion of two bed units, capable of accommodating four bed spaces, to provide more affordable housing options for other households (e.g. young and retired couples, families with young children and smaller sized households) that are more flexible to their changing circumstances within the most accessible locations of the Borough. These will also help reduce overcrowding issues within the existing stock of one bed units and help release under occupied family housing.
- 4.1.3 The 2021 census indicates the number of households increased by 6.3% (circa 5332) to a total of 89,600 units between 2011-21. During this period, larger sized households of 4 or more persons (i.e. 40% of total increase), families with children (58% of total increase) experienced significant growth and other households (including multi generation) increased by 10%. Further, 7 person (52%/430) and 8 person households (156%/912) experienced a significant level of growth, which means there has been a rise in multi generation households residing in a single unit or over-crowded housing (i.e. 14.4% of households) due to affordability of housing or the lack of availability of suitable family sized accommodation. In contrast, the Census indicates that the stock of terraced, detached and semi-detached housing declined by 3% (1541 units) between 2011-21, whilst purpose-built flats (including bedsits) increased by 17% (4495 units). Due to this, the number of one bed and two bed units have significantly increased (i.e. 17%, 6% or 1727, 1259 units, retrospectively) and three bed dwellings have declined by 7% (2631) units. Therefore, there is currently an imbalance between the demand/need and the supply for family sized housing (3 bedrooms or more).
- 4.1.4 The Mayor's Strategic Housing Market Assessment (2017) highlights that one bed units are the largest requirement for market and affordable housing in London (i.e. third of need between 2016-41), based on a model that assumed that any single person or couple aged over 25 years who wish to occupy their own property will do so, irrespective of whether they can afford to do so or not (Draft LHNA, 2022). In contrast, the Council has undertaken a Draft Local Housing Needs Assessment (LHNA, 2022) to gain an understanding of the required future housing and tenure mix to meet future needs. The key findings are; families with children are expected to experience the greatest increase from all household types and account for circa 25% (3600) of the growth in households between 2021-41. Other households which include multi person households are expected to increase by 36% (2800), which is largely driven by multi generation households with older persons living with their family. Couples without children are likely to see significant growth (31%,9300), but this is largely driven by older (55-64 age group +24% of increase, 2270) and the retirement age (65-85. Age group, +7400), whilst the working age groups (25-54) will see an overall net decline of 400 people. Whilst single person households between the 15-64 age groups are expected to see an overall decline of 23% (2000) and the only groups in this category that experience an increase 75-84 and 85+ retirement ages households.

- 4.1.5 The LHNA estimated the future housing size mix by tenure to address future needs, which will be updated periodically when new LHNA's are commissioned. This will be used to inform a residential development's size mix particularly in terms of affordable homes provision. Where developments are providing affordable housing however, the council encourages early engagement as there may be specific needs in that area that are a greater priority to address. The LHNA indicates there is a significant level of need to increase the delivery of family sized housing (i.e. 3 bed or more), as part of any housing mix. For market housing, there is a high priority to increase the delivery of family sized housing, medium priority to delivery two bed units and a lower priority to deliver smaller sized units (1 bed or studio units).
- 4.1.6 The LHNA indicates the future need for the size mix for affordable housing is more varied (than market housing) to ensure this addresses the needs and remains affordable for households with a range of incomes. Within social rented and London living rented housing there is a lack of need for one bed units due to the significant over-crowding in the existing stock, a high priority to deliver 3 bed social rented and a medium priority to deliver two bed housing as they provide more flexibility to changing circumstances of households. Within Affordable home ownership accommodation, there is a high level of priority to deliver two bed units, followed by one bed units and a low priority to deliver larger three bed or more units due to affordability constraints of households. Although the priority is to increase the delivery of affordable family housing, a range of factors will be considered to determine an appropriate size mix of affordable housing products on a site-by-site basis. This includes; the site size, location, character of the area the need to maximise the delivery of affordable housing on site, viability as well as level of local need for specific sized housing based on the housing register.
- 4.1.7 Given the significant need for family housing in the affordable and market tenures, the policy requires developers to ensure 25% of all dwellings delivered on site are three bed (or more) units and a higher proportion than this are delivered on suitable sites, to address the housing needs of families. The dwelling size mix of the remaining units within the scheme will be determined on a case-by-case basis, based on consideration of a range of factors such as the site size, physical characteristics, location, the need to optimise housing output and deliver affordable housing. Proposals that fail to comply with the requirements of this policy in relation to delivering an appropriate dwelling size mix will be resisted, unless this supported by robust evidence. The Local Plan Viability Study (2024) has indicated it is broadly viable for residential schemes to ensure 25% of total units delivered are three bed (or more).
- 4.1.8 The above approach will help ensure an appropriate balance is achieved between a competing set of factors, such as; increasing the delivery of housing to fully address the future housing needs of the area (particularly families) by optimising the housing output of sites, the need to take account of the site size, constraints, location, character of the area and viability. In addition, there is a low priority to deliver one bed and two bed market housing because the number of single person households of working age are expected

to decline, couple households without are not expected to increase and the overcrowding of the existing stock.

- 4.1.9 To help secure inclusive and mixed communities, there is a need to promote a more varied size mix in future housing developments, to avoid the oversupply and concentration of smaller housing units, overcrowded housing, increasing flexibility of housing for the changing circumstances of households, as well as increase the potential to deliver three bed or more units on suitable sites and locations. The key measures that are proposed to help achieve this are outlined below.
- 4.1.10 The Council will resist development proposals that comprise solely of studios and 1 bedroom, 1 person units or developments that will result in an overconcentration of 1- or 2-bedroom units on a site or local area. London Plan policy H10 (Housing size mix) makes clear that developments with a higher proportion of 1- and 2-bedroom units are generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity. This policy is considered to provide sufficient flexibility to respond to individual site circumstances. For example, in situations where there are site development constraints or where proposals for such provision would demonstrably enhance the mix and balance of housing unit types within a larger development site or local area. In addition, it acknowledges that there may be instances where 1 bedroom unit schemes may be required to address the needs for older people. Studio units and 1 bed/1 person units intended for single person occupation are not considered to provide a long-term, sustainable solution to meeting local housing need.
- 4.1.11 The Council will require well designed two-bedroom properties to be capable of accommodating 4 bedspaces (in line with the London Plan Internal Space standards), to ensure flexibility to changing circumstances of households, reduce overcrowding and help address the needs of families who are unable to access or afford suitable three bed units. Further, applicants will be required to demonstrate the proposed design, layout and sizes of rooms ensures flexibility to the changing circumstances of households, particularly for families. Therefore, proposals will be required to ensure the living area for a two-bedroom property can potentially be used for a third bedroom and the kitchen area for both preparing food and a living /lounging room area, if household circumstances change, in line with the internal space standards of the London Plan. The benefits of this are; it will reduce the risk of overcrowded housing and the demand pressure on the existing stock of family housing, encourage the efficient use of resources, reduce waste, promote the circular economy and help achieve the net zero carbon target.
- 4.1.12 Flatted schemes will be required to provide family accommodation on the lower floors, with access to private gardens or communal outdoor amenity space. In addition, these should be well designed for the use of family members who may be elderly or have a physical disability, sensory health issues (i.e. light, noise) or suffer from autism.

## Policy HO2: Conversion and redevelopment of dwellings

### Linkages:

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO2: Conversion and redevelopment of dwellings**

1. To effectively manage housing growth and ensure that residential conversions into multiple homes do not have a detrimental impact on the character, stock of family sized housing and amenity of local areas; permission will only be granted for proposals for the conversion of family sized homes into smaller self-contained residential units (C3) where the criteria below are met:
  - a. The internal floor area of the existing dwelling should exceed 130m<sup>2</sup> (as originally built) or could be accepted to be extended to this size; where 2 self-contained residential units or more are proposed.
  - b. The conversion should provide at least one family sized home with a gross internal floor area of at least 74 m<sup>2</sup> and be capable of providing a 3-bedroom, 4-person dwelling on the ground floor or if this is not possible on the upper floor(s); with access to a dedicated rear garden of the converted home.
  - c. The site is within an area of PTAL 3-6.
2. Proposals will be required to:
  - a. Comply with the minimum internal space standards of the London Plan
  - b. Ensure the converted flat on the ground floor is well designed to adequately meet the needs of a range of future residents, particularly older persons and those with physical disabilities.
  - c. Achieve configurations that are practical and fit for purpose, having regard to circulation, storage space, room size and shape and relationship with other homes;
  - d. Ensure homes are dual aspect and that all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise;
  - e. Make adequate arrangements for the provision of amenity space for future occupiers of the development; via the subdivision of this, to enable satisfactory access to a private space for each unit. In exceptional circumstances, the provision of high quality well designed communal amenity space may be acceptable, if it is demonstrated; (i) the subdivision of amenity space would be unsuitable due to site constraints; (ii) there will be adequate privacy safeguards for ground floor occupants and (ii) robust arrangements for long term their management and maintenance.
  - f. Make adequate arrangements for the storage and collection of waste and recycling material generated by future occupiers of the development

- which does not give rise to harm to; the character, amenity of the area; and for future and neighbouring occupiers;
- g. Ensure that the design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retain a single door to the front elevation of dwellings in residential areas;
  - h. Demonstrate adequate measures are taken to increase the level of and enhance soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) and limit the need for hard landscaping areas, to ensure proposals do not detract from the appearance of the property or the street scene, as well as support urban greening and net gains in biodiversity;
  - i. Make adequate provision for parking (in line with Policy M2) and safe access to and within the site and not lead to any material increase in substandard vehicular access;
  - j. Make sufficient provision for well-designed cycle storage, within a safe, accessible location. This should not result in the visual clutter of the frontage of the property or street scene and an adverse impact on the areas character; and
  - k. Ensure that levels of external activity would not be detrimental to residential amenity and character.
- l. Demonstrates compliance with any relevant supporting guidance
3. Proposals for extensions and alterations to converted houses and other residential premises will be supported having regard to the above criteria.
  4. Proposals that would lead to an over intensive conversion, redevelopment or which would compromise any component of this policy, will be refused.
  5. The Council will also apply the above criteria to any proposals for the demolition and redevelopment of an existing home to provide two dwellings. and the housing mix policy will apply to proposals that will result in three (or more) residential units

### Supporting Text:

- 4.2.1 The Draft Local Housing needs assessment indicates there is a high priority to increase the provision of family housing (3 bedroom or more) to address the needs of existing and future households in the area (i.e. families with children, multi generation families), reduce overcrowding, and provide housing options that are affordable and suitable for younger families and lower income households. Further, the area is anticipated to experience an ageing population and this policy will help address the potential increase in the under occupation of existing dwellings, as well as enable families to live within proximity to one another and take care of elderly or younger members. A significant proportion of proposed housing growth is anticipated to be accommodated within the Harrow & Wealdstone Opportunity Area and close to/within town centres, stations which may impact the scope to deliver additional family sized dwellings and replace the loss of the existing stock. In addition, it is also important policies encourage the delivery of high quality and well-designed dwellings.

- 4.2.2 This policy sets out an approach to determine proposals to convert large family housing into multiple flats and seeks to restrict the loss of them via the re-provision of a minimum three bed flats. It sets the considerations for assessing proposals and aims to address the multiple issues facing the area (noted above), whilst achieving a balance between the need to maintain the existing stock of family dwellings, increase the delivery of additional housing to meet future needs and affordable housing options via new flats. It also must balance this with concerns from existing residents in relation to the potential issues that can arise from a high concentration of flats from conversion of housing; such as the potential detrimental impact on the character and amenity of a neighbourhood.
- 4.2.3 To manage the existing stock of family size homes better, the Council seeks to require the conversion of family accommodation into smaller self-contained dwellings to re-provide at least one family size dwelling. On this basis a threshold of above 130m<sup>2</sup> gross internal floor area (as originally built) has been set as the smallest floorspace allowance that could successfully incorporate two self-contained units respectively. This can consider its potential to extend not yet implemented, or potential extensions which will be consistent with the Council's Residential Design Guide SPD (2010) or its subsequent replacement. A key added advantage of maintaining a stock of smaller family housing (below 130m<sup>2</sup>) is that this will provide a form of starter units for those on lower income, younger households who experience affordability issues accessing housing in the open market.
- 4.2.4 To mitigate the further erosion of family accommodation the policy requires that a family sized home (of at least 74m<sup>2</sup> gross internal floor area providing 3 bedrooms) is included within any proposed conversion of a house to self-contained flats. The re-provided family sized flat should preferably be on located on the ground floor (or if this is not possible on upper floors), with direct and inclusive access to a rear garden. Further, this policy will also apply to the demolition and redevelopment of dwellings into two flats to ensure there is no net loss in stock of family housing. The housing mix policy will apply to demolition proposals that will result in three (or more) residential dwellings, to ensure an appropriate housing size range is provided and avoid a large number of schemes being permitted with a 3-bed dwelling and 2 or more smaller 1 bed units. This approach is considered consistent with the London Plan (2021) that states *"Where existing houses are redeveloped or subdivided, boroughs may require the provision of family-sized units (3 bed + units) providing sufficient design flexibility is provided to allow the existing footprint of a house to be enlarged in order to meet this requirement"*. (para 4.2.8)
- 4.2.5 The term 'as originally built' refers to the floor area of the property prior to any extensions being carried out. Extensions carried out pre-1948 can be included in the original floor area. Parts of the dwelling that were not originally habitable rooms (for example lofts and cellars) would not be included for the purposes of calculating original floor area.
- 4.2.6 Nevertheless experience shows that, working within the fabric of buildings designed to provide traditional family housing and (typically) constructed in the

inter-war period or earlier, conversion proposals pose challenges in respect of internal layout, external appearance, the resulting relationship with neighbouring property and the potential to adversely impact upon the character of residential areas. Within the context of Policy GR1, which seeks to achieve a high standard of design, layout, privacy and amenity, this conversion policy provides bespoke criteria for conversions to ensure that these challenges are addressed in a manner that results in development with a high quality of design of a standard and residential amenity that is consistent with policy objectives for new build residential development. Further guidance is provided in the Council's Residential Design Guide supplementary planning document. In line with national and local policies (.i.e. SP2, HE1) relating to the historic environment, it will be important of proposals for the conversion/redevelopment of dwellings to include a high quality design scheme, materials that enhance, protects the significance of both designated (e.g. nationally Listed Buildings, conservation areas, etc), non-designated heritage assets (e.g. Local Areas of Special Character) and the their settings. Further, it should be noted a heritage impact assessment and listed building consent may be required on a case-by-case basis. The Council will give regard to the desirability of preserving listed buildings, the character and appearance of them, their setting and those features which make it special.

- 4.2.7 Over-intensive conversions of existing dwellings and other residential premises, such as maisonettes above shops, lead to poor living conditions for future occupiers of the development, excessive internal noise transference and external activity for neighbouring occupiers, and frequently to a poor external environment that detracts from the appearance of the property and the character of the area. Appropriate application of design, layout, privacy and amenity considerations to conversion proposals, including the London Plan minimum space standards, Part M of the building regulations (i.e. accessible, adaptable and wheelchair dwellings), will assist in ensuring new homes will provide a satisfactory standard of accommodation that are appropriate within the existing character of the area.
- 4.2.8 The open, green quality of the suburban environment is part of Harrow's historical appeal. This has been impacted by hard landscaping to mainly accommodate cars in front gardens and to a lesser extent to manage/store waste, as part of the intensification of existing premises. This has reduced the level of incidental green infrastructure, which has affected the visual quality of the environment, biodiversity and surface water run-off. Therefore, the design of proposals should seek to increase and enhance the level of soft landscaping on forecourts (including those that are include hard landscaping) and seek to limit the need for hard landscaping areas. This will ensure proposals do not detract the appearance of the property or the street scene, as well as support urban greening and net gains in biodiversity, reduce surface water run-off.
- 4.2.9 As with new-build residential development, the Council expects conversion and redevelopment proposals to make adequate amenity space provision for future occupiers of the dwellings being created. Amenity space must be useable and functionable for future occupiers in terms of layout, size and

access to sunlight. Where an existing garden is available, proposals must make this available for all future occupiers of the development, preferably through subdivision to form private amenity spaces for each home and accessible within the site boundary. Where, exceptionally, amenity space is to be provided communally, the Council will wish to be satisfied that there would be adequate privacy safeguards for the ground floor occupiers and that there will be robust, sustainable arrangements in place for managing the on-going maintenance responsibilities.

- 4.2.10 As part of the subdivision of rear gardens to form private amenity spaces for future occupiers, proposals must make provision for bin storage within those amenity areas and a suitable access for them to be wheeled to the forecourt for collection. Existing and new homes in the Borough are supplied with separate bins for general waste, recycling and composting, which allows the segregation of waste by residents and recycling of it. However conversions increase the number of bins to be accommodated within the curtilage of an existing dwelling, and where left on the forecourt they can be unsightly and cause obstruction. The accommodation of bins within the site therefore requires careful attention as part of design and layout of conversion proposals. The provision of bins within private amenity spaces with suitable access for them to be wheeled to the forecourt for collection, usually offers the best solution in terms of householder responsibility for use, maintenance and waste segregation, and helps to avoid the excessive accumulation of bins on forecourts. Where such storage cannot be achieved (for example, terraced houses) there must be adequate space on the forecourt to accommodate the bins and provide suitable storage (if necessary) and screening in conjunction with other forecourt uses. Applicants should also review the Council's future Waste Strategy and ensure compliance with the requirements of this, particularly in relation to ensuring waste vehicles can access the property and the waste area being kept clean and clear.
- 4.2.11 Cycle storage should be well designed, located within a safe, accessible location. This should not be provided within the forecourts/front gardens of properties and be provided within rear of gardens (or side of properties), to reduce visual clutter and harmful impacts on the street scene and character of the area. In exceptional circumstances, cycle storage may on forecourts/front gardens, providing it is well designed in terms of its location, materials and includes an appropriate level of soft landscaping to adequately screen it.

## Policy HO3: Optimising the use of small housing sites

### Linkages:

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO3: Optimising the use of small housing sites**

1. Small housing developments (any site below 0.25 hectares) delivering a net addition of self-contained dwellings through the optimal and efficient use of land, and in accordance with other relevant the Development Plan Policies, will be supported where located in the following areas:
  - a. Sites with good public transport accessibility (PTAL 3-6)
  - b. Sites within 800m of tube or rail stations
  - c. Sites within 800m of a Metropolitan, Major and District Town Centre boundary
2. Any incremental change in character arising from the development of small sites in locations set out under Part 1 should reflect the opportunities identified in the Harrow Characterisation Study and Tall Building (2021) or subsequent versions.
3. Proposals on small sites (including those outside of the locations set out under Part 1) shall: shall:
  - a. Demonstrate a character- and design-led approach by setting out how the proposed development considers the existing context, assessing the site and surrounds for the sensitivity to change,
  - b. Ensure compliance with the requirements of Policy GR1 in terms of its design and layout, residential amenity and hard/soft landscaping, etc
  - c. Protect and enhance biodiversity and green infrastructure, and further maximise opportunities for urban greening;
  - d. Ensure sufficient parking (in line with Policy M2) is provided on site to avoid the risk of harm to safe operation of the surrounding highway network and safety of other road users.
  - e. Sites involving residential conversions must be consistent with Policy HO2: Conversion and redevelopment of dwellings.
4. Developments that fail to optimise potential housing delivery on a site or prejudice more comprehensive development, particularly that of a site allocation, will be refused.
5. The Council will monitor the effectiveness this policy through the Annual Monitoring Report. Contingency measures may be undertaken (if necessary). to address any under delivery during the plan period or through a future review of the Local Plan

### Supporting Text:

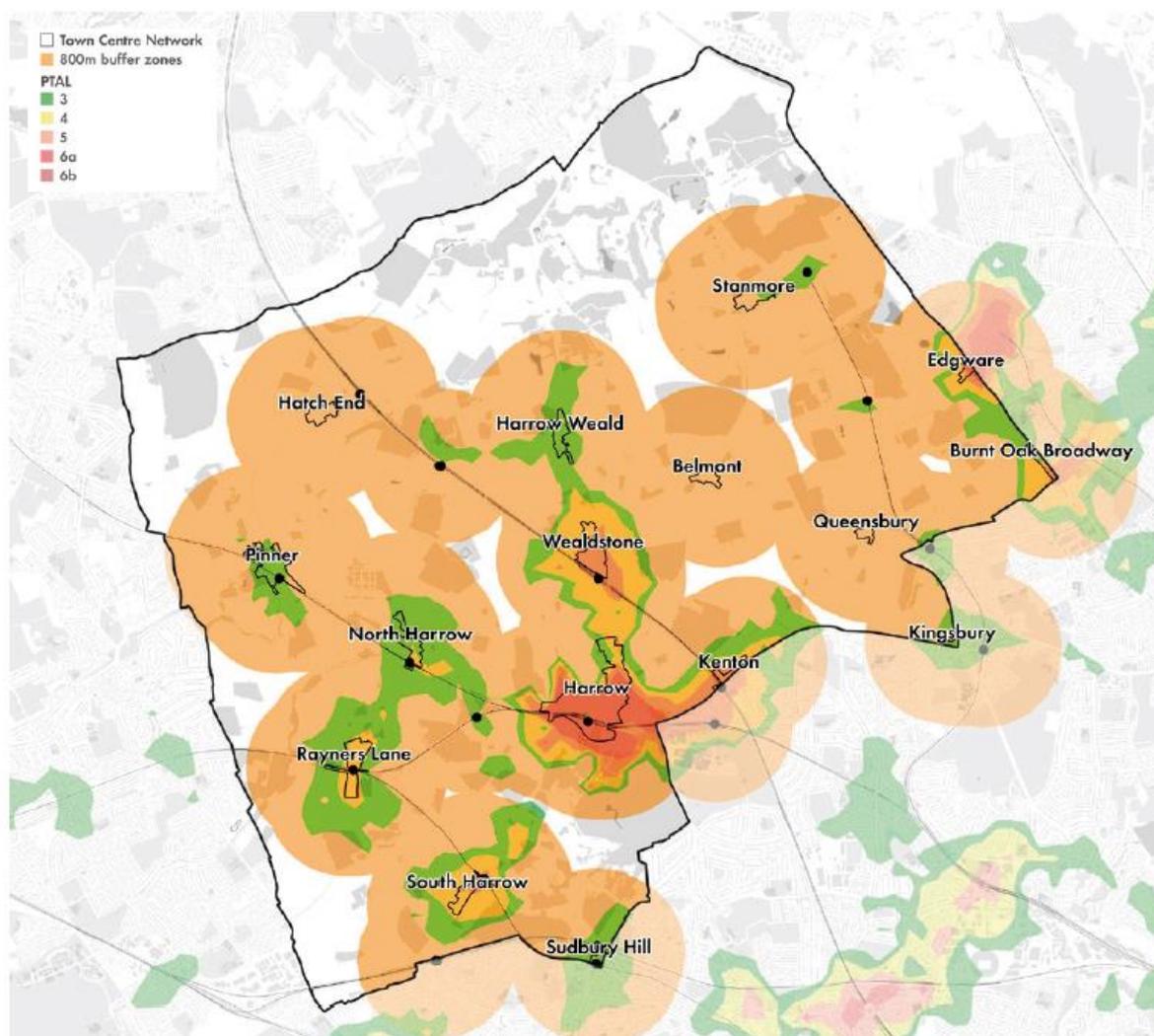
- 4.3.1 The London Plan (Policy H2: Small Sites) sets a strategic priority to increase the rate of housing delivery from small sites (below 0.25ha in size), particularly within outer London. For Harrow it sets small sites target of delivering 3750 additional homes (or 375 units per annum) over a ten year (2019/20 – 2028/29), which is a component of the overall housing target. This figure comprises circa 47% of the London Plan ten-year housing delivery target of 8020 for Harrow. The London Plan and NPPF (2021), require Local Plans to include measures to boost the supply of housing on small and medium sized sites to diversify the sources of housing supply and increase the delivery of housing to address local needs.
- 4.3.2 The London Plan expects the incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station (tube or rail) or town centre boundary<sup>12</sup>, to play an important role in contributing towards the housing targets for small sites. Within these geographical areas incremental intensification is facilitated by Policy H2, providing a design and character led approach is taken, in line with the criteria above, to deliver additional high-quality homes. Proposals outside of these locations are less likely to be considered as sustainable and have more potential to cause harm within such locations. However, proposals may still be found acceptable provided they are sensitively designed to protect, enhance and reflect the character of the area and result in no unacceptable impact(s) identified when assessed criteria above and against other policies in this Plan. Specifically, care must be taken to protect the often much lower density suburban form and potential impact to carparking provision required for a site or the wider highway network.
- 4.3.3 This type of intensification can take a number of forms (as identified in the supporting text to Policy H2), such as: new build, infill development, conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. Proposals will need demonstrate consideration of Policy GR10: Infill and Backland sites, back gardens and amenity areas and ensure compliance with requirements of this. Specifically in relation to residential conversion, policy HO2 Conversion and redevelopment of dwellings will apply, which is an approach considered consistent with para 4.2.8 of the London Plan (2021). A map of the locations that meet the criteria of the small sites policy are shown in the diagram<sup>13</sup> below.

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<sup>12</sup> Metropolitan, Major and district centres

<sup>13</sup> NB: This diagram is based on the old ward boundaries and will be showing the new boundaries in the future Draft Local Plan

### Areas 800 metres from town centre and stations, PTAL3-6b



Source: Harrow Characterisation and Tall Buildings Study (2021)

- 4.3.4 The supply of new homes from large and medium sites can fluctuate and increase in some years due to longer lead in and built out rates, associated with gaining planning permission and completing more complex strategic sites. This policy seeks to encourage the development of small sites, to provide a range of different sized housing sites in different locations, diversify the sources of housing supply and ensure a steadier supply of housing of sites to address local needs, as well as maintain a five-year supply of deliverable sites. It also seeks to facilitate a wider range of development companies active within Harrow so that development is not contingent on a small number of larger companies progressing a limited number of small sites.
- 4.3.5 The London Plan expects this Plan to recognise that local character evolves over time. Small sites provide the opportunity for communities to grow organically while maintaining their original character or evolving it incrementally based on a consensual approach. The Harrow Characterisation and Tall building Study (2021) has assessed the potential for growth across

the borough, considering the sensitivity to change, to understand the potential development capacity of individual character areas across the borough to both tall and mid-rise buildings and small sites. This provides design guidance for small site developments concerning the context, massing, materials, heritage, frontage, and detailing. This is alongside specific design guidance for each character area, which sets out the relevant strategy, an analysis of existing features and where there are opportunities to improve character. Whilst each individual proposal will be assessed on its merits, the study provides a framework for understanding the character of the borough and its capacity for change.

- 4.3.6 The open, green quality of the suburban environment was part of Harrow's historical appeal. Over time, intensification of building coverage and hard landscaping, principally to accommodate cars, has reduced incidental green infrastructure. This has not only affected the visual quality of the environment, but has also biodiversity, urban temperatures, air quality, and the volume and speed of surface water run-off, together with water quality. Small site development without some form of safeguards could well intensify these matters. Therefore, the design of proposals should consider urban greening to protect and enhance biodiversity, in line with Policies GI3 Biodiversity and GI4 Urban Greening, Landscaping and Trees.
- 4.3.7 Proposals should seek to optimise the housing output on small sites, to address local needs, whilst ensuring compliance with other development plan policies relating to high quality design, the protection and enhancement of the local character, minimising any potential amenity impacts on the surrounding area, etc. Further, proposals should ensure the design, layout of their site does not prejudice the comprehensive delivery of adjacent sites or wider area. In addition, proposals will be required to consider any future local guidance that may be produced, in line with the Small Sites Design Code London Plan Guidance (2023), to support well designed new homes on small sites.
- 4.3.8 The London Plan (2021) indicates the small site target can be considered as a reliable source of windfall housing sites and can contribute towards anticipated future housing supply towards meeting the Local Plan housing requirement/target, as well as demonstrating a five-year land supply of deliverable housing sites. Whilst the NPPF 2021 (para 71), emphasises this approach should be supported by compelling evidence to demonstrate that a windfall allowance is a reliable source of housing supply.
- 4.3.9 The Small Sites Capacity Study (2022) indicates an average of 298 homes per annum were delivered on small sites between 2010-19 within the Borough. This study sought to identify potential development sites below 0.25ha, assess their suitability, availability and their potential capacity for providing new housing, to meet the small sites target. The study concluded the small sites identified as suitable may have a potential capacity to provide between 380 (design led capacity work) and 478 (London Plan Density matrix) additional homes per annum.
- 4.3.10 Strategic Policy 3 set outs the level of housing anticipated from various sources of supply during the plan period, including a small sites windfall

allowance (SSWA) of 375 homes per annum (based on the London Plan small sites target), to assess whether the housing capacity of all sources of potential sources of supply will meet the proposed housing requirement/target.

- 4.3.11 This policy presents a new strategic approach to meeting housing need locally. We will monitor progress towards the small site housing target through the Annual Monitoring Report and consider this policy's effectiveness through the Local Plan review process. Monitoring will also provide the Council with information to understand the spatial distribution of new small housing development and consider whether interventions are necessary. For example, to ensure those areas where this type of development is concentrated are appropriately supported by community facilities and other strategic infrastructure.

## Policy HO4: Genuinely Affordable Housing

*Linkages:*

*NPPF: Chapter 4: Decision-making*

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO4: Genuinely Affordable housing**

#### **Targets**

- A. Affordable housing will be required to be delivered on site (except for LSPBSL), to promote mixed and inclusive communities, unless exceptional circumstances can be demonstrated (refer to (E) below).
- B. Proposals for major residential and mixed-use development (10 units or more gross units) must demonstrate they have sought to optimise the housing output on a site and apply the threshold approach included within Policy H5 of the London Plan, to increase the delivery of genuinely affordable housing. Proposals must ensure an initial minimum of 35% of all gross residential development delivered within a scheme are affordable housing (and comply with criteria of Policy H5 C) to apply for the fast-track route, as well as demonstrate all options have been explored to achieve the Boroughwide target of 50% affordable housing, based on habitable rooms or floor space. Public sector land, Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites will all be expected to deliver the threshold level of at least 50 per cent affordable housing on each site. Where a public sector landowner has an agreement with the Mayor to deliver at least 50 per cent across their portfolio of sites, then the 35 per cent threshold should apply to individual sites.
- C. The following will be considered when assessing the maximum level of genuinely affordable housing that could be delivered:
  - a. The contribution to the Borough's strategic affordable housing target, subject to viability and application of the threshold approach.
  - b. The need to make the most efficient use of land to facilitate and optimise the delivery of affordable housing.
  - c. The proposed tenure mix of the scheme and the need to prioritise the delivery of social rented and affordable family housing, in line with the table below.
- D. Development proposals will carry greater planning benefit, where they demonstrably deliver the maximum viable amount of genuinely affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy, (Policy H5 of the London Plan),

- E. Applicants will then be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The Council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Harrow.
- F. The affordable housing requirements for major developments will apply in circumstances where development has already been permitted (or is under construction) and 10 or more gross dwellings will be delivered taking into account of the following:
- New residential units that are proposed which would result in an uplift in the overall number of units on the site;
  - Development that is proposed on an adjacent site which by virtue of its layout, design and use is functionally related to the extant permission and would result in an uplift in the overall number of units across the sites; and
  - Exception to the above applies, if the applicant demonstrates ownership has changed and no relations with the original landowner/developer.

**Tenure mix (see tenure products definitions in Appendix 1)**

- G. Major residential development will be required to provide a tenure split of 70 per cent low cost rented homes (social rent or as per London Plan Policy H6) and 30 per cent intermediate product homes (London Living Rent or shared ownership), in line with the Local Housing Needs Assessment (or any subsequent updated evidence). The intermediate products should meet the definition of genuinely affordable housing. These must be for households within the most up to date income caps identified in the range for different local income brackets/dwellings within the London Plan Annual Monitoring Report.

Table: Identified needs by affordable housing tenure

Tenure of housing	% required
Low cost rented (Social rented or as per London Plan)	70%
Intermediate: Shared Ownership and / or London Living Rent	30%
Total	100%

- H. The Council will prioritise the delivery of social rented housing over other affordable housing products as this is considered the most genuinely affordable product and the most appropriate to address local needs, when negotiating the tenure mix of schemes. The factors below will be considered, when assessing an appropriate tenure mix:
- The need to prioritise the delivery of a higher proportion of social rented housing in the mix of affordable housing;
  - Evidence to demonstrate that the proposed tenure mix will deliver mixed inclusive communities within the locality;
  - Compliance with the requirements of Policy HO1: Dwelling size mix. Proposals should ensure they meet the full range of housing needs, particularly those of low-income households who require family housing;

- d. Evidence of meaningful discussions with Registered Providers which have informed a different tenure, size of units and design to address local priorities and explored funding opportunities and informed the capital value of the affordable housing; and
  - e. Evidence to demonstrate a different tenure mix will lead to a higher quantity of affordable housing and provide products that are genuinely affordable for a range of household incomes to address local needs.
- I. The affordable housing provision within Build to Rent developments will be expected to be 100 per cent at Discounted Market Rents at an equivalent rent to London Living Rent or lower. The applicant will need to demonstrate the rents are set at a genuinely affordable rent levels and allocated to those on the waiting list in accordance with a local eligibility criteria.
- J. The affordable housing Community-led housing scheme products within community-led housing schemes, may be provided in a different tenure (via prior discussions with the Council), providing it is genuinely affordable and meets identified housing needs.

#### **Viability tested route**

- K. Site-specific viability information will need to be justified by the applicant and the Council will determine the weight that should be given to this in decisions, taking account of any exceptional circumstances. Any proposals where site-specific viability evidence is justified must provide the maximum amount of affordable housing. This should be based on the methodology and assumptions set out London Plan, and the Affordable Housing and Viability LPG. The cost of any independent review must be covered by the applicant.

#### **Review Mechanisms**

- L. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal, the use of 'review mechanisms' will be required, where appropriate, and implemented; in accordance with the London Plan and any associated guidance.

#### **Offsite contributions**

- M. To promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision or payment in lieu for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated to the satisfaction of the Council that:
- a. It is not practical or feasible to provide affordable housing on-site due to site development constraints; and
  - b. where off-site provision is proposed:
    - i. A higher level of affordable housing can be secured through provision on an alternative site;
    - ii. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing; and
    - iii. The provision will better support inclusive and mixed communities.

**Vacant building Credit**

- N. The application of the Vacant Building Credit (VBC) will be supported, where applicants demonstrate compliance with the criteria below:
- a. The building is not in use at the time the application is submitted;
  - b. The building is not covered by an extant or recently expired permission;
  - c. The site is not protected for an alternative land use; and
  - d. The building has not been made vacant or abandoned for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.
- O. The affordable housing policy will apply to any net increase in the floor space of the vacant building.

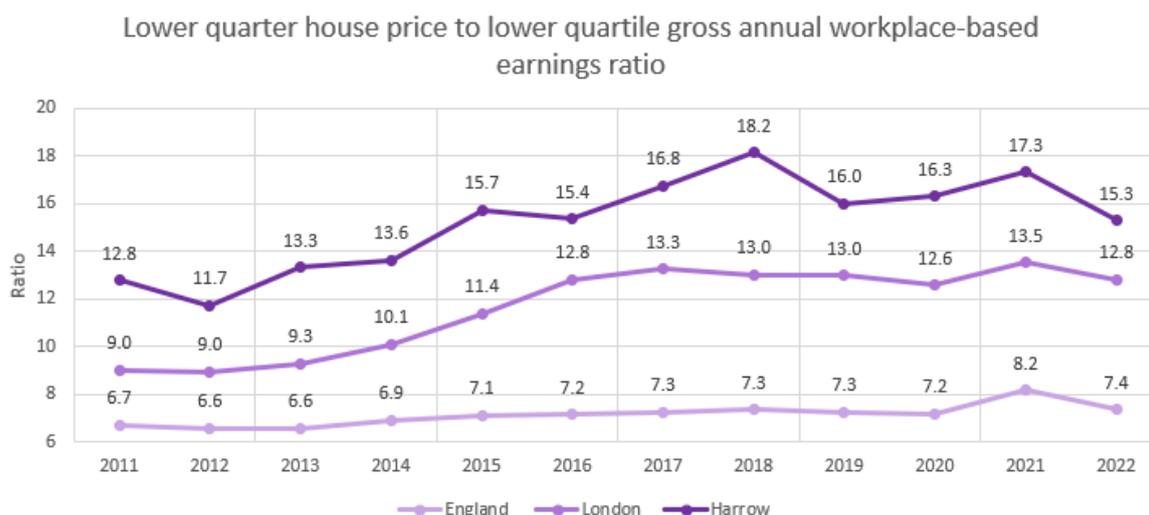
**Mixed and inclusive communities.**

- P. To secure inclusive and mixed neighbourhoods and communities the Council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, development proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions).
- Q. All new affordable housing developments must be of a high-quality design having regard to other Local Plan policies. The design of the units should be 'tenure neutral' in line with the National Design Guide, so that affordable units are indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity. Where mixed tenure schemes are proposed these must ensure all residents of the development have access to amenities and communal spaces including play spaces.

**Supporting Text:**

- 4.4.1 Similar to the rest of London and England, the housing crisis is having a significant negative social and economic effects on the Harrow resident's standard of living and wellbeing, particularly for the low-income younger households and families. This is demonstrated by the affordability issues households face to buy and rent suitable housing to adequately address their needs. For example, ONS data indicates lower quartile house prices increased from £230k to £390k between 2011 – 22 (70 %) and the annual lower quartile work placed earnings increased from £17,988 - £25,495 (42%) in Harrow. Due to this the lower quartile house prices to annual earnings ratio, which is an important indicator for housing affordability, increased from 12.79 to 15.3 (20%) during this period. This means housing affordability has worsened as lower income groups typically spend more than 15 times their work based annual earnings on purchasing a home.

4.4.2 In contrast, the lower quartile weekly rents thresholds for; a room increased by 22.5% from £400 to £490, one bedroom home increased by 33% from £750 to £1000, two bedrooms increased by 34% from £930 to £1,250, three bedrooms increased by 29% from £1,200 to £1550, four bedrooms (or more) by 20% from £1500 – £1800 between 2011/12 – 2021/22 (fig 17, Draft LHNA). Hence, the cost of renting a home is largely unaffordable to lower quartile earning residents, particularly family housing (3b+) within the Borough, without housing benefit, more than on earner or reliance on renting a bedroom within a house or HMO property and availability of affordable housing.



4.4.3 The Draft Local Housing Needs Assessment (LHNA 2022) utilised a model to assess the future number of households who will not be able afford to own or rent suitable market housing, the quantity of affordable housing, size, tenure of affordable housing; that may be required to address their needs. This indicates an overall housing need to deliver a total of 7,714 affordable homes (or 386 dwelling per annum) between 2021 – 41, which is equivalent of circa 50% of the future Borough housing requirement/target (16,040). This is made of 6549 (85%) homes for those households who are unable to afford to rent or own market housing and 1164 (15%) homes needed for those who aspire to home ownership but cannot afford it. A further breakdown is provided of the tenure products (6549) that may be required to address the future affordable housing needs. This indicates 66% of affordable housing should be social rented (i.e. 3728 +1386), 2% affordable rented housing (164), 16% London Living Rent (1272) and 15% (1164) low-cost home ownership products. In line with London Plan Policy H6, this means circa 70% of affordable housing should be low cost rented products (i.e. social rented/ affordable rented products) and the remainder 30% intermediate housing products.

4.4.4 This LHNA includes an analysis of the weekly housing cost of different 1-4 bed affordable housing products. This indicated that the weekly cost of social rented (e.g. 2b = £126 pw) and affordable rented housing (e.g. 2b = £207) was significantly less than First Homes (e.g.2b = £271) and shared ownership (e.g. 2b = £305) products for all sized units. Further, it included an analysis of the potential income required for 1-4 bed affordable housing products. This indicated a lower income was required for socially rented housing (e.g. 2b =

less than £36k) and London living rented housing (e.g. 2b = £36k - £68k) than shared ownership (e.g. £68k -£90k) and First Homes (£53-90k) products for all sized units. This demonstrates social rented housing and London Living rented housing is genuinely more affordable based on local incomes and costs, compared to First homes with a 50% discount and shared ownership products. Proposals will need to demonstrate that intermediate housing products are genuinely affordable to local residents based on an assessment of lower quartiles/median incomes and cost of owning/renting dwellings in the Borough. The LHNA indicates a lower income is required for shared ownership accommodation than First Homes with a 50% discount for family sized accommodation (.i.e. 3b+). In line with the Mayors Practice Note and London Plan (2021) Policy H6, the delivery of First Homes is not considered an appropriate product that is genuinely affordable to address the Boroughs local housing needs. The key reasons are the price of new First Homes, after applying the 30% discount is likely to exceed the £420k price cap of the policy, particularly for family sized units and higher discounts would be unviable. The Government policy requires 25% of all affordable units to be First Homes, which will be contrary to tenure mix of the London Plan Policy (H6) and Local Policy HO4 that seek to prioritise the delivery of genuinely affordable social rented housing and other more affordable intermediate housing products such as London Living Rents that are likely to be displaced.

- 4.4.5 A significant number of homes are needed to meet Harrow’s affordable housing needs of the Borough. The needs outweigh the number of genuinely affordable homes within the necessary tenures (predominantly social rent) that can realistically be delivered over the lifetime of the Plan. This is the case when taking into account both the planning enabling and affordable housing provider funding mechanisms available. National policy requires the council to set affordable housing targets that are realistic, particularly in relation to development viability.
- 4.4.6 The London Plan, Policy H4 sets the strategic target of 50% for affordable housing. London Plan Policy H5 sets a threshold approach to assessing applications and to follow the fast track approach to delivery (without the need for a viability assessment), proposals must provide a minimum of 35%<sup>14</sup> affordable housing without public subsidy with a 70:30 tenure split agreed with the Council on all land, other than public sector or designated employment land a 50% threshold level for affordable housing applies, unless there is a agreement with the Mayor on a portfolio of public sector sites where 35% threshold applies on individual sites and at least 50% across them. The affordable target is set and assessed on the basis of the percentage of the development’s habitable rooms, or if there is a disparity between affordable and private room sizes, the habitable floorspace. Applications that exceed (or meet) the thresholds level of affordable housing on gross units within the scheme will follow the fast-track route and those that fall below this will follow the viability tested route, as set out within Policy H5. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal the use of ‘review mechanisms’ will be

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<sup>14</sup> or an increased threshold included in a future London Plan Review

required, where appropriate, and implemented in line with the Mayor's Affordable Housing and Viability SPG. To ensure applicants fully intends to build out the planning consent an early-stage review will be triggered for fast-track schemes if an agreed level of progress is not made within 24 months of gaining permission (or any other period agreed as part of the planning application). Whilst schemes under the viability tested route will be subject to an early-stage review and late-stage review triggered at the point that 75% of homes are sold, or at a point agreed by the Council. In addition, one or more mid-term reviews may be required for larger schemes.

- 4.4.7 Policy H6 sets out the Mayor's minimum requirements in terms of tenure for 60% of the affordable housing sought. It then requires borough local plans to provide further detail on what the remaining 40% should comprise. Harrow's needs are predominantly for social rent/ London Affordable Rent levels. These are more difficult to deliver as they require the highest amounts of subsidy, either from the public purse or via cross subsidy from market homes for sale/ rent.
- 4.4.8 The Council is very supportive of the Mayor's long term 50% affordable housing target and the fast-track approach as set out in policy H5 as a tool towards achieving the 50% on all sites in the longer term. The Draft London Affordable Housing Supplementary Planning Guidance (2023) indicates the Mayors strong preference is for the delivery of Social Rent homes, which are best placed to address current housing needs and are eligible for grant funding under the London Affordable Homes Programme (AHP) 2021-26. In relation to its local element of the London Plan tenure split over which it has discretion, the Council will seek to maximise the amount of social rented units that can be delivered on site in non-build to rent schemes. The Council recognises the important role the provision of intermediate affordable housing products can play to address the needs of key workers. The Council may prioritise the allocation of intermediate affordable housing for certain key workers, based on the housing register and other evidence of need. This will be secured via a S106 agreement with developers on a site-by-site basis. The Local Plan Viability Study (2024) indicates that the proposed affordable housing target (assuming a 70: 30 split between Social rented: low cost rented housing, as well as 25% of units are provided as family sized housing) is broadly deliverable over the Plan period, whilst acknowledging that the fast track approach will be applied to secure the maximum viable proportion and site specific circumstances will be considered on a case by case basis
- 4.4.9 Consistent with London Plan policy H6, any deviation from the minimum affordable percentage of habitable rooms not consistent with the required tenure mix and other policy requirements consistent with the fast-track approach will need to be fully justified through a policy compliant viability assessment.
- 4.4.10 Where viability impacts are so great that a reduction in percentage of affordable housing that can be achieved on site is below that required for the fast-track approach, the council will seek to pursue the preferred tenure split set out in policy. It views the delivery of more affordable tenures that would meet needs (social rent and London Affordable Rent) as a greater priority than

achieving a potentially higher percentage of affordable housing on site that places greater emphasis on intermediate tenures. Some developers nevertheless seek to increase the overall headline affordable homes percentage delivered on their site above the London Plan threshold levels through the provision of more intermediate tenure dwellings. In these cases, the council will seek a scheme which greater prioritises genuinely affordable rents, even if this results in the overall headline percentage of affordable justifiably reducing.

- 4.4.11 London Plan Policy H11 sets out a requirement for 30% of the affordable dwellings within a build to rent scheme to be at London Living Rent levels. The other 70% is for boroughs to identify, taking account of needs and viability. The Council will seek to achieve 100% London Living Rent equivalents, or lower. Similar to affordable housing delivered from qualifying mainstream housing developments, it will prioritise affordable housing that meets priority needs (cheaper forms of rent) where the fast-track approach is not being pursued. For schemes where affordable is below threshold levels it will as a minimum seek 70% of the affordable provided as London Living Rent equivalent. The Local Plan Viability Study will be undertaken to assess the achievability of this approach.
- 4.4.12 In relation to intermediate housing tenures, the Council would welcome affordable solutions, such as community led housing or self-build/custom build housing, which can offer a genuine alternative mechanism for delivering new affordable homes. Where these types of solutions however potentially undermine the delivery of its preferred tenure mix, it should not automatically be assumed that this will be acceptable. Promoters of such schemes should seek to engage early on with the Council.
- 4.4.13 In accordance with national policy and London Plan Policy H4, on major residential developments affordable housing should be provided on site, as part of the emphasis on creating mixed and balanced communities. Nevertheless, it might be that in exceptional circumstances financial contributions in lieu of provision of affordable housing on site will be acceptable. More detail on when contributions in lieu of on-site provision will be acceptable and how they are calculated is set out in the Mayor's Housing SPG. The acceptability of contributions in lieu will be determined on a case-by-case basis in early discussion with the Council.

## Policy HO5: Housing estate renewal and regeneration

### Linkages:

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO5: Housing estate renewal and regeneration**

1. Development proposals involving the renewal and regeneration of the Borough's Housing Estates, including any enabling market housing, must be carried out in consultation with existing residents, the local community and other relevant key stakeholders, in line with the London Mayor's Good Practice Guide to Estate Regeneration. Proposals must ensure:
  - A. There is no net loss of affordable housing floorspace, and
    - a) replaces like for like tenure and size; or
    - b) meets the needs of returning residents (subject to a decant strategy); or
    - c) complies with the Council's latest housing needs assessment; and
    - d) the demolition, replacement of affordable housing follows the viability tested route and seeks to provide an uplift in additional affordable housing, in accordance with Policy H8 of the London Plan
    - e) where developments seek to introduce market sale housing to enable the estate regeneration, any further uplift in genuinely affordable housing provision should be made. This should be delivered in accordance with Policy HO4: Genuinely Affordable Housing and Policy H5: Threshold Approach of the London Plan.
  - B. Any affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as low cost rented homes (social rent or as per London Plan Policy H6).
  - C. The tenure of additional affordable housing (other than the replacement provision) should comply with Policy HO4: Genuinely: Affordable housing; prioritising the need to deliver additional social rented housing.
  - D. The size of both market and affordable accommodation provided through estate regeneration schemes should be based on the particular needs of both the existing, and prospective future residents. It must consider the requirements of Policy HO1: Dwelling size mix that prioritises the delivery of additional family sized housing.
  - E. All affordable housing products are integrated into the development to ensure mixed, balanced and inclusive communities.
  - F. Ensure a design led approach is undertaken; to achieve the most optimal and efficient use of land.

- G. A satisfactory quantum of accessible hard and soft landscaping is provided in line with other policies within the Development Plan.
  - H. Where a net loss of external amenity space is proposed, on a case by case basis, consideration will be given in relation to;
    - a) The existing quantum/quality of external amenity space
    - b) Proposed quantum/quality of external amenity space
    - c) Other planning benefits arising as a result of the loss of external amenity space
    - d) A sufficient level of play and informal recreation space is provided in line with the approach set out in London Plan policy S4 and Local Plan policies
  - I. Estate regeneration schemes increase permeability and integration into the existing urban built form; improve safety and access for walking, cycling and public transport use to local amenities for residents; improve the public realm within the estate; and create new walking and cycling routes through estates as appropriate.
  - J. Spaces and facilities are provided to enhance opportunities for social interaction, integration to support strong and inclusive communities that encourage physical activity and healthy living
  - K. Compliance with parking standards set out in Policy M2 should apply, unless exceptional local circumstances are demonstrated
2. Proposals for estate renewal, regeneration schemes should be supported by a statement setting out its overall social, economic, environmental, health benefits.
  3. Estate regeneration proposals should form comprehensive development schemes, rather than piecemeal proposals. Where only part of an estate is brought forward, it must form part of a wider masterplan.
  4. The Council will consider the use of Compulsory Purchase Order powers to facilitate the delivery of a comprehensive regeneration scheme, where appropriate.
  5. The Council will support proposals for Estate Renewal and Regeneration that demonstrate compliance with above requirements and Policy SP03, including those relating to undertaking a master plan led approach, identifying and addressing location specific issues, and bringing forward a comprehensive scheme.

### Supporting Text:

- 4.5.1 The Council is committed to ensuring all of Harrow's residents have access to a decent home that is secure and affordable. This will require that significantly more new genuinely affordable housing is made available in the Borough. In addition, it is vital for the safety and security of residents and the wider community that homes are well integrated into their neighbourhoods, with plentiful opportunities for social interaction, and that high quality living environments benefit the health and well-being of local residents.

- 4.5.2 Harrow's council homes were mainly built between 1950 and 1970, as the area was a focus of efforts to tackle shortages of good quality housing following the Second World War, and are concentrated in the Harrow Weald, Roxbourne, Pinner and Stanmore Park wards. There are numerous social housing estates across the Borough. This includes the larger estates at Grange Farm, Mill farm, Rayners Lane and the smaller estates at Woodlands, Cottesmore (Stanmore Park Ward), Headstone and Headstone Lane (Hatch End), Vaughan Road/Butler Avenue and the Honeybun (West Harrow ward), Northolt Road Estates (Harrow on the Hill ward) and Pinner Hill.
- 4.5.3 In line with the previous Core Strategy, the comprehensive renewal and regeneration schemes for Mill farm and Rayners Lane estates has been completed. Whilst the permitted scheme to encourage the regeneration, renewal of the Grange Farm estate is currently being implemented. Grange Farm estate is approximately 4.1ha and consisted of varied housing across the site. However, the predominant housing on site was a known as Restiform housing, which built in the 1990s as temporary accommodation. The building construction typology was of poor quality and was only intended to have a lifespan of 30 years. Through the passage of time, the homes on the site had deteriorated and were extremely inefficient and not fit for purpose. The remainder of the stie comprised of a poorly utilised community centre and the designated open space was of poor quality and not used effectively or efficiently.
- 4.5.4 The Council have commenced the regeneration of the Grange Farm Estate. A hybrid planning application was granted planning permission in 2018, which resulted in approximately 574 new homes being approved on the site, and importantly, affordable homes for the borough including re-providing homes for existing residents of the estate. Works are underway on site currently, with 89 affordable homes in phase 1 being delivered.
- 4.5.5 Phases 2 and 3 will follow and will deliver more housing including affordable homes. All new homes will meet current guidance and requirements in terms of internal space standards, accessibility and energy efficiency. Along with the delivery of new housing on the site a new, larger, fit for purpose community centre will also be provided, set within a much higher quality open space for the benefit of residents and the wider community.
- 4.5.6 The indices of Multiple Deprivation (2019), indicate there is high levels of deprivation within the Borough estates, particularly Stanmore Park ward that covers the areas of Woodlands and Cottesmore Estates; followed by the Hatch End Ward that covers the Headstone and Headstone Lane Estates. This is related to factors; such as poor standard of housing (i.e. lack central heating or housing that fails to meet decent homes standards relating health, safety), barriers to accessing housing (i.e. affordability), and services (geographic barriers/physical proximity, overcrowded housing, low incomes effecting children and older people; low levels of employment, health issues (physical/mental) of residents; lack of education attainment/skills,.

## Grange Farm Estate Regeneration Scheme



4.5.7 Other key issues that all or some of the estates may be experiencing are:

- (a) the housing stock has reached the end of its life and is physically decaying.
- (b) families are residing within overcrowded housing.
- (c) the stock of social housing is being lost via the Government's right to buy scheme, whilst the opportunities to replenish it are limited in contrast to increasing needs for genuinely affordable housing.
- (d) Some of housing stock does not meet decent homes standards.
- (e) The housing stock has poor energy efficiency resulting in higher energy bill and "fuel stress".
- (f) Some of the estate housing stock may be unsuitable for residents with physical disabilities, older residents and wheelchair users.
- (g) The estates suffer from poor quality external space and urban planning such large areas of hard standing areas with no natural surveillance, raising safety concerns. There are areas of left over space between development that are an inefficient use of land.
- (h) Lack of /fragmented designated and non-designated open space that is poorly used, accessed and maintained.
- (i) Presence of garage courts that are no longer used for their original purpose.

- (j) Large areas of hard standing for car parking that are inefficiently used.
  - (k) Lack of or poor access to community facilities and other facilities (i.e. health) that are important for the wellbeing of residents and supporting healthy, sustainable communities.
  - (l) Lack of or poor access to public transport (such as buses) serving estates, even though lower income groups are highly dependent on it due to a lack of alternative.
- 4.5.8 The conditions of housing estates and challenges they face varies and the programme required for these will differ. Some of the older estates may have physical constraints that may limit site or area wide enhancements. For example, their layout, design may make it difficult to introduce new access points and through routes, provide more usable open space. Also fragmented/multiple land ownership may be an issue for bringing sites forward. In other circumstances, options may arise to deliver more affordable housing units on estates, either through incremental infill or comprehensive redevelopment. Accordingly, strategic approaches to estate renewal and regeneration may be necessary in certain circumstances.
- 4.5.9 All development proposals for estate renewal and regeneration must ensure that there is no net loss of affordable housing floorspace, in accordance with other Development Plan policies. Loss of existing affordable housing will only be permitted where it is replaced by equivalent or better-quality accommodation, providing at least an equivalent level of affordable housing floorspace, on an identical or equivalent basis<sup>15</sup>. The use of floorspace (i.e. based on habitable rooms) as the measure for replacement provision provides flexibility for the Council and its partners to better address acute housing needs, such as for more family sized social housing, where redevelopment is undertaken. To achieve no net loss, higher density, including the introduction of market housing may be necessary to increase the viability of schemes and achieve a more mixed and balanced community. This approach is consistent with the London Plan.
- 4.5.10 Replacement and additional affordable housing should reflect the housing needs of existing and future tenants of the estate, as well as consider the requirements of Policy HO1: Dwelling size mix that prioritise the delivery of additional family sized housing. Schemes should make provision to re-house existing residents, after which the mix of all additional units should reflect the wider housing needs of the borough in all but exceptional cases where a variation can be robustly justified. Existing residents should be rehoused in advance of occupation of new market housing.
- 4.5.11 Proposals for the renewal and regeneration of the Borough's estates should provide satisfactory levels of hard and landscaping areas within appropriate locations of the scheme. These should comply with other policies relating to

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<sup>15</sup> Affordable housing floorspace must be replaced on an identical basis where a tenant has a right to return. Where there is no right of return affordable housing must be replaced on an identical or equivalent basis, i.e. social rented floorspace may be replaced with social rented floorspace or by general needs rented accommodation with rents at levels based on that which has been lost.

satisfactory provision of external amenity/open space, walking, cycling and parking, as well as include measures to reduce surface water run off issues (via SUDS) and support urban greening and net gains in biodiversity.

- 4.5.12 The Development Plan sets out the quantity and quality of open space (amenity space) that is required to ensure these are accessible and address the future needs of the Borough. However, it may not be always possible to apply these standards, as there is a deficiency in accessible open space provision in certain parts of the Borough. Many of the Borough's estates include designated open space and any proposals for the renewal and regeneration of these should seek to ensure there is no net loss in open space provision, for which there is a presumption against within this Local Plan.
- 4.5.13 To justify the potential net loss of open space provision, in exceptional cases, applicants would need to submit a robust assessment of the existing quantity, quality of open space provision in contrast to the proposed provision and the rationale for the proposed net loss of open space, including other overriding planning benefits of the proposal. This should set out an understanding of the function, quality, benefits, and disadvantages of the existing provision, as well as options that were taken to limit any quantitative loss and why these were not appropriate. Any quantitative loss of open space should result in the delivery of a higher quality open space provision with a range of recreational facilities for children, as well as suitable measures for landscaping and urban greening to support biodiversity.
- 4.5.14 Proposals regeneration and / or renewal of estates should be bought forward via a master plan led approach covering all of the estate and should be developed in partnership with other stakeholders including other landowners. This will ensure a comprehensive redevelopment proposal comes forward for the estate, rather than piece meal redevelopment. This should investigate, in partnership and effective consultation with other stakeholders (including residents), the considerations below:
- (a) the physical, social, environmental, economic issues facing it, including health, equality issues facing residents, opportunities for addressing these,
  - (b) The needs/aspirations of existing/future residents in relation to the type, size, tenure of future housing; the level type of social infrastructure (including private/communal amenity spaces, community facilities, leisure and recreational facilities, parking)
  - (c) The assessment of the physical, environmental, heritage and other development constraints and appropriate measures to address these
  - (d) Sustainable transport measures including the improvement of pedestrian links, cycle paths, public transport initiatives within the site and linking to surrounding areas
  - (e) Measures to promote active lifestyles and healthy living
  - (f) Satisfactory access, layout, massing of blocks and design of the schemes

- (g) Appropriate levels of hard/soft landscaping, urban greening which are resilient to climate change and achieve a net gain in biodiversity in line with the policies in Chapter 7 Green Infrastructure.
  - (h) Measures to promote the efficient use of resources, minimise energy usage and explore options for the use of low carbon or renewable energy sources in line with Policies SP08, CN1 and CN2.
- 4.5.15 It should be noted the above list of consideration is not an exhaustive list, as these are likely to vary between different estates and other issues may emerge when proposals come forward or via consultation processes. The Council recognises that proposals permitted for the renewal, regeneration of the estates may need to be implemented in phases in line with its masterplan, whilst seeking to minimise any harmful amenity impacts and inconveniences to existing residents still residing in the estates. Applicants will be required to submit a Decant Strategy that demonstrates; the necessity of moving existing residents to alternative temporary/permanent accommodation, the process is fair and efficient, adequately considers the needs of households (e.g. access to schools, health issues) in order to facilitate the regeneration and redevelopment of all/parts of the estate. It will also be necessary to include measures to minimise any disruptions to the lives of existing residents during construction and the need for relocating them, after they have settled in accommodation within a given location. This should be based on discussions with the relevant Council teams such as housing, adult and social care and education, as well as comply with any relevant regulatory requirements and established good practices.
- 4.5.16 National Policy requires planning decisions to consider the social, economic and environmental benefits of estate regeneration. In Harrow's view, health benefits are equally important to address the objectives of sustainable development. Applicants for estate regeneration schemes should set out in a supporting statement the overall social, health, economic, environmental benefits of their proposal to enable consideration of these in the decision-making process and promote sustainable development.
- 4.5.17 During the Plan period, the Council will monitor the issues, challenges facing the Borough's Estates and those who reside within them, as well as potential public funding for estate renewal, regeneration and proposals that come forward via planning processes. Based on this, the Council may decide whether any direct intervention such as the use of Compulsory Purchase Powers is required (if appropriate), or indirectly with Registered Social landlords, site owners, to implement a comprehensive regeneration, renewal or maintenance scheme for the Boroughs estates, either via Planning processes or other mechanisms.

## Policy HO6: Accommodation for older people

*Linkages:*

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO6: Accommodation for older people**

1. Proposals for specialist C3 and non-C3 older peoples residential accommodation such as care homes and extra care facilities will be supported where:
  - a) It is demonstrated they would meet an identified local need, particularly to enable older people to live independently
  - b) It would deliver specialist older people accommodation that would contribute to meeting the Local Plan strategic target for specialist older person accommodation
  - c) Affordable housing is provided in line with Policy HO5
  - d) It has adequately considered and addressed all design issues in Part 2 or Part 3
  - e) it provides the necessary level of supervision, management and care/support for the intended occupants, which will be secured in a legal agreement;
  - f) It is easily accessible to public transport (PTAL 3-6), shops, services, community facilities (including health) appropriate to the needs of the intended occupiers
  - g) It contributes to mixed and balanced communities.
  - h) It considers and respond positively to the objectives, priorities of the Council's housing and commissioning strategies
  
2. Extra care proposals will be usually classed as a C3 use. Such proposals must demonstrate the design issues below have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
  - a) The proposal is for provision of self-contained units which address requirements for private internal space;
  - b) There should be an appropriate balance between private residential accommodation and communal space for ancillary uses to the primary use of the site.
  - c) Good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;
  - d) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;
  - e) Appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided;
  - f) Appropriate wheelchair accessibility is provided. At least 10 per cent of dwellings meet Building Regulation requirement to 'Wheelchair Adaptable Category M4(3)(2)(a)' standard or, where Harrow Council are responsible for allocating or nominating a person to live in that dwelling, Wheelchair Accessible Category

- M4(3)(2)(b) as set out in the Approved Document M of the Building Regulations. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'
- g) A higher proportion of wheelchair accessible dwellings built to (M4(3)(2)(b)) building regulations standards will be required for specialist older person accommodation products that seek to address the needs of those aged 65+. This will be determined on a site-by-site basis based on factors such as the need to optimise output, viability, site size and other constraints.
  - h) Proposals make provisions for a sufficient level, type of private, communal and public amenity spaces and facilities.
  - i) The layout and design of communal spaces/facilities should be designed to encourage incidental meeting, interaction and to develop a sense of community
  - j) Demonstrate how the range of type of units and their design will address the needs of people with dementia and other long-term health conditions, and be informed by discussions with providers and demonstrate accordance with the Council's commissioning and housing strategies
  - k) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off point within 50m of the main entrance in line with policy M2. This must be appropriate for emergency vehicles
  - l) Provision of suitable charging points for mobility scooters is included on-site – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings<sup>16</sup>
3. Care homes must demonstrate the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
- a) There is an appropriate balance of private residential space and ancillary space associated with the care required for the use
  - b) There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and staff;
  - c) 100% of all habitable rooms and multi-purpose space used by visiting healthcare or other professionals are wheelchair accessible;
  - d) Accommodation is provided in line with relevant design guidance and best practice standards; such as set out by the Care Quality Commission;
  - e) Adequate access, parking and servicing access arrangements are demonstrated, with a safe drop off within 50m of the main entrance. This must be appropriate for ambulance/minibus drop-off; in line with Policy M2
  - f) Provision of accessible communal outdoor space including a sensory garden for those who suffer from dementia for use by residents, staff and visitors which is well designed – in terms of its function, layout within development proposals – to ensure a good level of amenity with regard to daylight and sunlight, noise, enclosure, overlooking, privacy and security.
  - g) Adequate level and range of care facilities and support, communal areas/facilities (i.e. dining areas, lounging area, kitchen meal preparation) offered to address the individuals needs of residents on site

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<sup>16</sup> [Accessible design features in specialist older persons housing \(london.gov.uk\)](https://www.london.gov.uk/infrastructure/transport/accessible-design-features-in-specialist-older-persons-housing)

4. The Council will resist development proposals which involves the loss of floorspace in specialist older peoples and care home accommodation unless:
  - a) it can robustly demonstrate that there is a surplus over a long-term of this housing type in Harrow; or
  - b) adequate replacement on-site accommodation will be provided that satisfies Part 2 or Part 3; or
  - c) adequate replacement accommodation is provided elsewhere in the borough that satisfies Part 2 or Part 3; or
  - d) it can be demonstrated the existing accommodation is unsatisfactory for modern standards or cannot be adopted to meet these to re-provide the use and/or is not fit purpose.

### Supporting Text:

- 4.6.1 Harrow is expected to experience an ageing population with a significant growth in the older population during the Plan period. The Draft Local Housing Needs Assessment (2022) indicates that households aged 65 + plus are expected to increase by 28% and households aged 75+ are expected by 64% between 2021-41 (table 8). Whilst the ONS 2018 households' projections indicate that the Boroughs, 65+ household population is expected to increase by 21% and 75+ household population 25% between 2022-23. However, it should be emphasised the growth in the older population will require more housing that is suitable for an ageing population, although this is likely to be addressed via retrofitting/adapting the existing stock of housing, providing new high-quality housing built to adaptable housing standards, but this will not necessarily increase the need to provide additional specialised older people accommodation. The key reasons are most older people will most likely continue to remain within their house throughout their lives, whilst others may down/right size and it is a common cultural practice for multigeneration households to reside and care for one another in a single dwelling, particularly amongst the ethnic minority groups that form a large part of the Borough population. The Plan seeks to ensure a wide range of high quality and affordable housing options are available to older people. This includes accommodation for those seeking to remain in their homes, downsize from larger homes whilst remaining in the area, or people requiring more tailored, specialist accommodation with elements of support or care.
- 4.6.2 Local needs for older persons accommodation should be met principally through conventional housing. Where this is a good level of this type of provision available in the Borough there will be less reliance on specialist forms of accommodation (with varying levels of care). All new residential development in the C3 Use Class must therefore be designed to be adaptable to the varying needs of users at all stages of life, in accordance with Local Plan policies The Council will also encourage the retrofitting of existing residential buildings and units to better suit the day-to-day needs of older people, including by making them wheelchair adaptable or accessible. All proposals for retrofitting (via internal external alterations) must ensure compliance with other Local Plan policies such as those that relate to the

protection of the historic environment, heritage assets and character of an area.

- 4.6.3 Specialist older person housing is a term used to describe a range of types of housing (i.e. use class C3) that suit and meet the needs of older people and does not apply to residential and nursing care homes. This provides housing that enables an older person to live independently in their self-contained living space, with communal facilities and varying levels of support (if needed). This can include age restricted housing for people aged 55 years or above, such as key products like retirement living or sheltered housing for older people aged 60 and above (usually with on-site support and some communal facilities), extra care housing (with on-site care services) and care villages or continuing care retirement communities (with higher levels of care). It should be noted the market for older people accommodation is diverse and evolving and other products may fall within the definition of specialist housing<sup>17</sup>. The benefits of specialist housing are; they enable older people to live independently for longer, with positive health and wellbeing outcomes, whilst allowing access to care staff (if needed). They can result in savings for the NHS (i.e. reduce admissions and long stays) and adult social care, prevent/delay more costly moves into care homes; provide dementia-friendly accommodation; free up under-occupied homes (often with gardens) to meet the needs for family sized housing.
- 4.6.4 Further, residential or nursing care homes address the accommodation needs (i.e. use class C2), usually of those who are aged 75+ or have serious health issues or needs that requires specialist care staff or professional nursing staff. These are non-self-contained accommodation, comprising of a residential setting where a number of older people live, usually in single rooms, and have access to on-site care services and other facilities.
- 4.6.5 The London Plan (2021) Policy H13 sets the Borough an annual benchmark target to provide 165 units per annum (or total of 1980) of accommodation for older people between 2017-29 (12 years). This equivalent of 2300 units older people units over a 15-year period and 3,300 units over 20 years (2021-41). However, the Draft Local Housing Needs Assessment (LHNA) indicates this benchmark figure does not take account of the anticipated lower rate of forecasted increase in the older population, after 2029 and may have been overstated the level of need. The Council will monitor need, supply, pipeline of older people accommodation during the Plan period, and will consider updating the evidence (if necessary).
- 4.6.6 The Council commissioned Housing Learning Improvement Network (LIN) to undertake an assessment (2022) of the future need, for housing and supported accommodation for older people and adults who have care/support needs, including those eligible for care from Harrow Council adult social care, covering a period between 2022 -32. The aim of this was to inform the Council's future housing planning, investment and delivery programmes. This indicates a total need to provide 980 units of specialist accommodation for older people between 2022-32 (10 years), comprising of circa 660 units of

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<sup>17</sup> See Appendix 1: glossary for a definition of the different types of older people accommodation.

retirement housing; 320 units of extra care housing. In addition, it noted 30 bed spaces for residential care and 200 bed spaces for nursing care are required to address local needs. Therefore, a large proportion of housing needs of older people would be addressed via the delivery of a higher level of specialist older people housing such as extra care, retirement housing and there is small need to deliver nursing care homes and limited/no need for care homes. The LIN study indicates a total of 390 wheelchair accessible dwellings are likely to be required by 2032, to address the unmet needs of adults aged 65+. Therefore, the Council will require specialist older person accommodation products targeted (e.g. age restricted retirement villages) at the older population aged 65 (or over) to include a higher proportion of wheelchair accessible dwellings that meet Category (M4(3)(2)(b)) standards of building regulations to ensure older residents are living in well-designed environments and able to live safe, independent lives. The appropriate number of units that are wheelchair accessible dwellings within a scheme will be determined on a case-by-case basis and will consider site specific factors such as the need to optimise units, viability, site size and other constraints. Robust evidence will be required to justify a departure from this requirement.

- 4.6.7 The Council's Housing Strategy (2019) seeks to move away from the traditional model of providing care homes (with support staff) toward providing specialist older people housing with an appropriate level of support and ensuring existing/new stock of housing meets accessible and adaptable standards, to enable older people to remain independent within their accommodation. More general levels of accessibility in the wider public realm are also an issue and can also help enable people to remain in their homes for longer; policies which make streets more liveable can help to remedy this. The strategy indicates the overarching need is for affordable extra care housing for rent. It also seeks to increase the supply of extra care housing for older people in Harrow with frailty, mild to moderate dementia, physical disabilities and mild learning disabilities who can continue to live independently with appropriate support in place as an alternative to residential care. Further, it recognises a need to develop specialist housing solutions for people with dementia, through an approach that integrates housing, adult social care and health.
- 4.6.8 The Council's Adult Social Care Services Team have produced a Market Position Statement<sup>18</sup>. This sets out the Council's current commissioning approach and market opportunities for providers. It sets out the current understanding of social care needs, forecasts and demand projections. Further, it sets out Adult Social Care's commissioning intentions for Housing, including Extra Care and Supported Living, as well as areas such as Older People, People with Dementia, Learning Disabilities and Autism, Equipment Services and Assistive Technology etc. This will be updated, when necessary throughout the Plan period.
- 4.6.9 Applicants will be required to demonstrate how their proposal has considered the findings of the above evidence-based documents (or any subsequent updates to these) and how this has informed the type of product they are

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<sup>18</sup> [https://www.harrow.gov.uk/downloads/file/31688/MPS\\_Accessible\\_\\_\\_New\\_Logo\\_130723.pdf](https://www.harrow.gov.uk/downloads/file/31688/MPS_Accessible___New_Logo_130723.pdf)

proposing. Further, applicants are encouraged to have early discussions with the Council's Housing, Adult Social Care teams and other stakeholders, to ensure their proposal is addressing a specific local need, an appropriate design and layout, as part of the application process.

- 4.6.10 The Council's affordable housing policy will apply to specialist older people housing falling within a C3 use class. In addition, the affordable housing policy may also apply to C2 proposals that include self-contained units with a greater level of support floor space and there may be potential for residents to purchase them and choose their support/care provider. In relation to tenure of affordable housing within a scheme, the Council may accept a different split if robust evidence is provided by the applicant to justify this, as well as may consider a lower contribution if the units are 100% low cost rented products.
- 4.6.11 Specialist older persons and care home accommodation must be sensitively integrated into neighbourhoods at locations that are well-connected by public transport, and within easy reach of community facilities and services. Residents, carers and visitors should benefit from safe and convenient access to and from the site as well as the surrounding area. Developments should include accessible pathways and gradients to enable residents to move with relative ease whether by walking or with the use of aids, such as wheelchairs or mobility scooters. Accessibility is vital to ensuring the development adequately responds to the mobility needs of occupiers. It is also important to promote independence and facilitate social interaction, which in turn can help to address isolation and loneliness, which is a key public health issue.
- 4.6.12 There are a range of specialist older housing products that are designed for older people. Supported housing for other vulnerable groups is covered under Policy HO7. The Council will consider which use class a proposal falls into on a case-by-case basis, although extra care facilities will generally be considered to be C3 use unless they include a significant element of care. This will consider the supporting text of London Plan Policy H13 that provides guidance on the factors that should be considered, to clearly distinguish whether a scheme should be classed specialist older people homes or care home accommodation. Where a development proposal does not meet the attributes of specialist older persons accommodation or care home accommodation set out in the London Plan, then the general housing policies in the London Plan and Local Plan will apply. Regardless of whether extra care facilities are determined to be a C2 or C3 use (or Sui Generis use which could also be justified in principle), relevant policy requirements including affordable housing will apply. Development proposals must provide details of care aspects (including qualifying age), entry criteria, minimum expected numbers of care hours per week and the proportion of residents expected to need different levels of care; and how the facilities are to be funded and managed.
- 4.6.13 To ensure high quality accommodation is provided, the design of specialist residential accommodation for older people (including new build, conversions and extensions) must demonstrate it has considered and addressed a number of key design aspects. To ensure appropriate privacy for residents, elements of a building should be ranked on a scale of ascending privacy, with the most

public spaces close to either main entrances or centrally located, and the private dwellings the farthest away from the main entrance. There should be separation between areas just for residents, staff and visitors with a distinction between shared spaces. Provision of communal spaces must be proportionate to the scale of the accommodation and not excessive, optimising the accommodation for residents whilst maintaining the usability of the communal spaces. Research indicates that the sensory impact of the built and outdoor environment, in terms of colour, scent, light and touch can have a positive impact on quality of life of the elderly and those suffering from dementia, as well as can help ensure they maintain their independence for longer. In line with Policies GI3: Biodiversity and GI4: Urban landscaping and Trees, proposals should ensure that the design scheme of outdoor amenity areas are sensory stimulating for their occupants and reflect established good practices (e.g. dementia friendly design), particularly for the elderly and those who are experiencing dementia.

- 4.6.14 Suitable bathrooms, storage space for equipment and appropriate rooms for activities must be provided. Providing and retaining storage space is important for mobility scooters, hoists and other equipment both in existing accommodation and new provision. In particular, extra care should provide sufficient charging points for scooters, equivalent to 25% of dwellings. Likewise, conversions involving loss of activity rooms/amenity rooms would also need to be justified.
- 4.6.15 Developments must also make adequate provision for access, parking and servicing for vehicles, with drop-off points for taxis, mini-buses and ambulances located near the building's principal entrance.
- 4.6.16 When determining applications for specialist forms of older people's accommodation, the Council may take account of detailed standards and design guidance including (but not limited to) the following documents or any appropriate successor documents:
- A. The design and build of successful extra care housing – Housing LIN17<sup>19</sup>
  - B. Building better care homes for adults – Care Inspectorate<sup>20</sup>18; and
  - C. Extra Care Housing Development planning, control and management – RTPI Good Practice Note<sup>21</sup>
- 4.6.17 The Council owns a number of older person accommodations, the majority of which are sheltered housing schemes and were built between 1960-80s. Research indicates that some of this stock is likely to approach the end of its practical life during the Plan period, as it may not be consistent with current accessibility (e.g. for those with mobility issues), space and energy efficiency

<sup>19</sup> [Design principles A4 doc 08\\_02\\_11.indd \(housinglin.org.uk\)](#)

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[https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwi\\_s8H81aWCAxVgWEEAHe7uAvEQFnoECBMQAQ&url=https%3A%2F%2Fwww.careinspectorate.com%2Fimages%2Fdocuments%2F2279%2Fbuilding\\_better\\_care\\_homes-040414.pdf&usq=AOvVaw0rMbCi\\_MritPuHHN6YWbBe&opi=89978449](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwi_s8H81aWCAxVgWEEAHe7uAvEQFnoECBMQAQ&url=https%3A%2F%2Fwww.careinspectorate.com%2Fimages%2Fdocuments%2F2279%2Fbuilding_better_care_homes-040414.pdf&usq=AOvVaw0rMbCi_MritPuHHN6YWbBe&opi=89978449)

<sup>21</sup> [GPN8:GPN1 New \(housinglin.org.uk\)](#)

standards, as well as may not be suitable to address local needs. Therefore, the Council anticipates that some of these sites may require intervention to improve their conditions (e.g. refurbishment, retrofitting), whilst others may come forward as potential development sites to provide new/enhanced accommodation. This will help provide additional, suitable accommodation that is well designed, within accessible locations to local facilities/services to address the existing/future needs of the older population. This will provide more attractive option for older persons to downsize, release under occupied family sized accommodation and provide additional residential units to address local housing needs.

### **Older Persons' Accommodation, Marsh Road, Pinner**



## Policy HO7: Supported and Sheltered Housing

*Linkages:*

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO7: Supported and Sheltered Housing**

1. The Council will support proposals for the provision of specialist and sheltered accommodation for vulnerable, disadvantaged individuals or groups of the population, providing;
  - a. It is demonstrated the scheme will adequately address a specific local need
  - b. it is suitable for the intended occupiers in terms of the standard of facilities and the level of independence,
  - c. It provides the necessary level of supervision, management and care/support, security and community safety (where necessary)
  - d. it is appropriately located in areas that there is easy access to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers
  - e. Regard must be had to any best practice standards that the Council considers relevant, and which are related to the specific type of accommodation and the people/groups it is targeted towards
  - f. Proposals must consider and respond positively to the objectives, priorities of the Council's housing and commissioning strategies
  - g. It contributes to creation of balanced, mixed and inclusive communities and would not result in the over concentration of supported and sheltered housing within a neighbourhood that would result in a harmful impact on the amenities of neighbouring properties and surrounding area.
  - h. . It complies with other relevant policies within the Development Plan
2. The Council will resist the loss of supported and sheltered housing unless:
  - (i) adequate replacement accommodation of the same quality and quantity
  - (ii) will be provided for the particular group; or
  - (iii) it can be demonstrated that the accommodation is no longer needed for the particular group or other relevant groups in need of supported/sheltered housing; and
  - (iv) it can be demonstrated that the accommodation is not suitable for the care of the intended occupants (or other relevant occupants of supported/sheltered accommodation) in its current condition and format and/or is incapable of being maintained at an acceptable standard

## Supporting Text:

- 4.7.1 The Council seeks to ensure everyone has access to a decent and secure home. Supported and sheltered accommodation provide an essential place of residence for the most vulnerable and disadvantaged individuals or groups of society, as well as can include a certain level of support or care to address their distinct needs. The overall aim of this type of accommodation is to enable individuals with specific needs to live as independently as possible within the community, with an overall focus of promoting social inclusion.
- 4.7.2 The provision of a wide range of supported and sheltered housing is likely to be necessary during the Plan period, including permanent, long terms and shorter-term accommodation that meets temporary needs. This can include foyers accommodation<sup>22</sup> for young people, refugees, and long-term accommodation for people with ongoing support needs. The wide range of supported housing types may also include accommodation referred to as hostels (which may or may not have an element of care, but are distinct from visitor accommodation hostels). In planning use class terms, supported housing may be considered Sui Generis, C2 or C3 and would usually be considered exempt from (or be provided instead of) affordable housing requirements.
- 4.7.3 The Council commissioned Housing LIN to undertake an assessment the future need, over the next ten years (2022 - 32), for adults who have care/support needs, including those eligible for care from Harrow Council adult social care. A summary of the key findings of this are include below:
- (a) **Adults with mental health needs:** This indicates there were a circa total of 400 individuals, aged between 18-64 living with a mental health related need living in Harrow in 2022. A significant proportion of this population lived in mainstream housing (48%), followed by supported housing (26%), residential care (21%) and a smaller amount in nursing care (5%) and shared lives placements (1%). It projects that there will be a 100% increase in the number of adults who have mental health issues by 2032 (increase of 400 individuals). But in terms of type of future accommodation needs, their research indicates there will be a gradual shift towards supported accommodation (36%) with significant level of support, to enable recovery and independence, a 50% decline in in people living in nursing and residential care homes and half of needs will be accommodated in mainstream housing with a certain level of support if needed.
  - (b) **Adults with learning disability:** This indicates there were a circa total of 644 individuals, aged between 18-64 living with a learning disability living in Harrow in 2022 A significant proportion of this population were living with family/friends or informal carers (33%), followed by mainstream housing with care/support (23%), residential care (23%). Whilst a smaller proportion were living within supported housing/living

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<sup>22</sup> This is a type of secure accommodation that includes support for the personal development and encourages the independent living of its disadvantaged, vulnerable individuals

either self-contained or shared (18%) and nursing care (2%). The number of adults with learning difficulties is expected to increase to 675 (5%) individuals by 2033. Further, in relation to type of accommodation required to address this need, it suggests there will be a higher need for supported housing/ living in a self-contained environment (i.e. 25%), a rise in shared lives adult placements (5%), as well as 50% decline in adults living in residential care (11%), a decline in nursing care and a decline in individuals living with family/friends (25%).

- (c) **Adults with learning difficulties/autism:** It is estimated that there will be an increase in 155 people with learning difficulties/autism by 2032. It suggests this need should be addressed via rented supported housing (120) and shared lives accommodation (35).

- 4.7.4 The Council's Housing Strategy 2019 indicates there is a continuing need for supported housing to meet the needs of groups such as people with learning disabilities, people with physical disabilities, individuals and families at risk of or recovering from homelessness and rough sleeping, people recovering from drug or alcohol dependency, people with mental ill health, vulnerable young people (such as care leavers and teenage parents) and people fleeing domestic abuse. The Council will continue to work with a range of stakeholders, partners (e.g. registered providers) to deliver additional supported, sheltered accommodation products to address the future needs.
- 4.7.5 The Council have developed a Market Position Statement (MPS) for Adult Social Care Services in Harrow, which sets out the current commissioning approach and market opportunities for providers, the current understanding of social care needs, forecasts and demand projections. It will set out Adult Social Care's commissioning intentions for Housing, including Extra Care and Supported Living, as well as areas such as Older People, People with Dementia, Learning Disabilities and Autism, Equipment Services and Assistive Technology etc.
- 4.7.6 Applications should clearly set out how the development will assist in meeting an identified need for the use proposed. It is vital that the accommodation is appropriate for the use and group(s) for which it is intended, so that the specific type of managed care or supervision required can be delivered effectively. Applicant will be required to set out how their proposal has considered and responded to the finding of the above evidence-based documents (or any subsequent updates to these) and how this has informed the need, type of supported or sheltered housing product they are proposing. Further, applicants are encouraged to have early discussions with the Council's Housing, Adult Social Care teams and other stakeholders when developing their proposals for supported and sheltered housing schemes, in relation to the type of product being proposed and specific level of care / management requirements.
- 4.7.7 Supported housing may be acceptable as part of a mixed-use development, although where a proposal involves more sensitive types of supported housing, this may not be appropriate.

- 4.7.8 The Council consider supported housing to be any housing scheme where housing, support and (where relevant) care services are provided (or are capable of being provided) as an integrated package. Some schemes are long-term, designed for people who need ongoing support to live independently. Other, semi-independent living options are designed to help people develop the emotional and practical skills needed to move into more mainstream housing and provide varying levels of support. Support can include help with health needs, including mental health, drug and alcohol use, managing benefits and debt, developing daily living skills and accessing education, training and employment. Supported housing provision may be necessary for a range of people/groups<sup>23</sup>. Policy H12 of the London Plan includes a detailed list of groups for whom supported and sheltered accommodation may be suited for. Applicants will be required to submit a satisfactory management plan, detailing the level, type, duration of support/care that will be provided to the intended occupants. Measures required for the security and safety of the user (if necessary) shall be set out within the management plan.
- 4.7.9 In order to secure mixed and inclusive neighbourhoods and communities, development proposals should not result in a harmful overconcentration of similar uses within an area.
- 4.7.10 Existing supported housing and sheltered accommodation will be protected where need exists and the accommodation remains suitable, unless it is adequately replaced. The replacement can occur on-site or off-site and will be considered in terms of both the quality and quantity of accommodation replaced, in line with relevant best practice standards and the ability/need to provide continuation of a service. Off-site replacement may be acceptable but will depend on the quality of accommodation as set out within Part 1 of the policy.
- 4.7.11 Proposals must demonstrate the supported and sheltered accommodation is no longer needed for particular groups, to justify a loss of these. This should be considered at a local level to ensure that varying changes in provision at a wider scale are considered. Changes in service delivery can render accommodation outdated and no longer fit for purpose. Where loss of such accommodation is proposed, this must be evidenced including information which shows that refurbishment is not possible. Accommodation must be proven to be not fit for purpose for the existing specific supported housing and for other relevant types of supported housing which could reasonably occupy the accommodation. In some cases, a replacement development may provide units meeting different supported housing needs which fall within different use classes.

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<sup>23</sup> The relevant policy for accommodation related to older people, which may include housing which could be referred to as supported housing, is Policy HO6 Accommodation for older people

4.7.12 Proposals involving the loss of existing supported housing must take every opportunity to accommodate unmet need(s) for other relevant types of supported housing. There are a range of supported housing need(s) which will need to be considered, with differing design considerations which need to be considered to assess the feasibility of utilising existing provision. Consultation with the Council's Housing department, Adult Social Care department and/or Children's Services department must occur as part of evidencing meeting unmet need. Applicants must ensure the proposals for supported and sheltered housing promote high quality design in line with other policies of the relevant Development Plan. It will also be important to ensure that the design of outdoor amenity/communal areas are sensory stimulating for their occupants, to promote the health and well-being of its occupants, as well as help recover emotional or psychological stress of past experiences and maintain independent living.

## Policy HO8: Purpose-built student accommodation

*Linkages:*

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO8: Purpose built student accommodation**

1. Proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation (PBSA) will be supported providing:
  - a. It is demonstrated there is a local or strategic need for the proposal
  - b. Proposals for PBSA must be appropriately located:
    - i. on well-connected sites that are easy to access by walking, cycling and public transport;
    - ii. Within or at the edge (300m) of town centres, which benefit from good provision of shops, services, leisure and community facilities appropriate to the student population,
    - iii. Priority is given to sites located in proximity to the education facility the development is intended to serve, or other higher education institutions
  - c. The majority of the bedrooms in the accommodation are secured for use by students over the lifetime of the PBSA, via a nomination agreement with one or more specific higher education provider (HEP). This evidence must include confirmation the proposed rental levels for PBSA are supported by the linked HEP(s)
  - d. A range of accommodation types, including cluster flats with shared kitchen and bathroom facilities, unless it is demonstrated this would be inappropriate
  - e. It is well-designed, providing appropriate space standards and facilities and it is sustainable by virtue of being adaptable to alternative residential use or other appropriate town centre uses
  - f. A satisfactory site management and maintenance plan (secured by planning condition) covering the lifetime of the accommodation is agreed by the Council, to demonstrate an acceptable level of amenity and access to facilities for its occupiers and not give rise to unacceptable impacts on the amenities of the occupants of the accommodations and existing residents, neighbouring uses in the surrounding areas.
  - g. The level of PBSA proposals (individually or cumulatively) in a location should not:
    - i) result in the harmful overconcentration of PBSA within a given location and undermine mixed and inclusive neighbourhoods. This will have regard to the character of the area, mix of uses, potential impacts on neighbouring properties and residents within the surrounding area.
    - ii) compromise the delivery of conventional self-contained housing, particularly family and affordable housing to meet the Borough needs, in line with Strategic Policy O3.
  - h. The maximum level of accommodation is secured as affordable student accommodation on-site in line with London Plan Policy H15.

2. Proposals for any potential ancillary or temporary use of the accommodation during vacation periods should be designed at the outset of the scheme and should ensure:
  - i. There are no adverse impacts or risks to the safety, welfare and amenities of the existing students and staff occupying the student accommodation, in compliance with any FE or Council policy/regulations
  - ii. There are adequate design measures to limit/restrict the movement of occupants of the PBSA, temporary /ancillary uses and distinguish between the permanent use
  - iii. There is not an over concentration of similar uses, which can impact the balance and mix of uses and result in potential harmful amenity impacts
3. The loss of existing PBSA will be resisted unless it is demonstrated:
  - (a) It no longer caters for current or future needs,
  - (b) It is unsuitable and unviable for operating within the existing use;
  - (c) the floorspace is replaced by another form of residential accommodation that meets other priority Local Plan housing requirements
  - (d) Exception to the above is if the scheme is proposing to replace existing accommodation with equivalent floor space that meets modern standards.

### Supporting Text:

- 4.8.1 London's higher education providers make a significant contribution to its economy and labour market. The Harrow campus of Westminster University is located on the southern edge of the borough boundary, within the administrative area of Brent. It is located within the southern edge of the Harrow and Wealdstone Opportunity area (circa 180m), as well as within proximity to Harrow Metropolitan Centre (circa 500m) and Kenton District Centre (circa 500m). There are several further education institutions; such as Harrow College; situated within the Borough which attract students from both within the Borough and the greater London area, who generally tend to commute rather than reside in student accommodation within the Borough.
- 4.8.2 The London Plan includes a policy (H15) to consider the need for Purpose-built student accommodation (PBSA). This identified an annual need to provide 3,500 bed spaces of PBSA but does not allocate borough benchmarks or targets. The key reasons are; needs will vary with changes in higher education provider' estates, Government policy, and site availability. Further, it clearly emphasises that *"meeting the requirements of PBSA should not undermine policy to secure mixed and inclusive neighbourhoods"*. To date the Council has received a limited level of interest for PBSA, but it is very likely the Borough's student population are residing within the existing stock of rental housing products, such as HMO's, flat/house shares or living with parents or family.
- 4.8.3 The Draft Local Housing Needs Assessment (LHNA) indicates the Borough does not have a high student population compared to other areas within London and it is common for students to attend a University in one Borough and reside in another. Therefore, the LHNA did not undertake a detailed assessment of the housing need for this group. But the households'

projections within this show a limited rise in younger sharing households; no significant increase in single person households and couple households without children; who may be in student age groups (i.e. 15-24 and 25-25-34) during the Plan period (i.e. 2021-41). The projected rise in other households is explained by the increase in multi generations households as opposed to sharing households (e.g. HMO, house shares). Although the evidence does not indicate a need for student accommodation, guidance is needed for consideration of applications that may come forward for a HEP located within another borough.

- 4.8.4 This policy seeks to steer new PBSA within existing town centres (excluding neighbourhood centres) or 300m from the edge of them. These locations are likely to be more; accessible to HEP; conveniently located within proximity to local facilities, services and public transport, including good walking and cycling infrastructure. The key benefits of this are; it will enable students to easily address their daily needs for retail, leisure facilities, local facilities via sustainable modes of transport (without private car use), reduce the cost of living; as well as support the vitality, viability, and the regeneration of the Borough's Town Centres. Further, it will help avoid the risk of the potential adverse impacts of the potential high cluster of various types of student accommodation in residential areas of the Borough that are characterised by dwellings predominately occupied by family housing (i.e. on street car parking, displacement of family households, affordability of housing, amenity issues). Applicants will be required to demonstrate the site selection process has given priority to locations that are within proximity to HEP that the PBSA is intended to serve. PBSA that is intended to meet a need from outside of the Borough should be supported by sufficient justification in relation to the site location, both locally and in the individual site context.
- 4.8.5 To avoid speculative student accommodation, new PBSA schemes proposed by private providers must be developed and secured (via a nomination agreement) for occupation by students of one or more specific HEP. This ensures proposals will genuinely address an identified need. In line with Policy H15 of the London Plan (2021), applications will only be permitted if they provide evidence of an end user affiliated with a HEP and demonstrate appropriate management arrangements are in place, so that rooms will be rented solely to students over the lifetime of the development, including an identified landlord, agent or management company. Further tenancies should have regard to the likely level of financial support/income of the intended occupiers and the proposals rental levels should be submitted, with evidence the HEP support this.
- 4.8.6 Site management and maintenance plans are important to delivering successful PBSA schemes, as well as avoiding potential harmful amenity impact on its occupants and the surrounding neighbourhood. These plans will be required for all new PBSA and will normally be secured as a planning condition. The plans will be expected to cover matters like site management and maintenance, on-site wardens, communal facilities, safety and security for occupants and the elimination of potential amenity issues.

- 4.8.7 Student accommodation can benefit the Borough's neighbourhoods and communities, by attracting a population that can boost the level of expenditure within the Borough's town centres, provide more skilled flexible labour for local businesses and services, addressing the potential impacts of an ageing population, retaining a highly skilled/knowledgeable workforce to make the area attractive for new investment, creating additional jobs and businesses locating within the area. But an overconcentration of student accommodation within a local area can have a harmful impact on the amenity of existing residents and uses, as well as undermine objectives for delivering mixed and balanced communities. Further, this issue can compromise the delivery of conventional housing that is of higher priority to address the Borough's future housing needs and overconcentration of PBSA may not always result in the optimal use of the land<sup>24</sup>. In instances where there is a potential risk of an over concentration of student accommodation within a given location, the Council will resist proposals.
- 4.8.8 The Council will expect proposals to consider the specific requirements of HEP and take these into account wherever possible.—Schemes will be expected to include a range of accommodation, including clustered study bedrooms with shared facilities, double units, and single and studio units. Cluster flats with shared facilities are likely to be more affordable than en-suite single rooms and self-contained studio units. Student unit sizes and layouts should be varied, particularly to cater to the needs of wheelchair users, mature students with families, students who want to live alone and for groups of students using shared facilities. The provision of a variety of layouts will allow for greater flexibility for conversion to permanent self-contained housing or other appropriate town centre uses if in future the building is no longer needed as student accommodation, thus ensuring its sustainability. If it has been demonstrated that it would be inappropriate to include a range of accommodation within the scheme, applicants will be required to demonstrate they have considered different layouts at the design stage for a scheme, to enable it to easily be converted to a C3 residential use or other appropriate town centre uses (e.g. C1 hotel) in the future if the shared living scheme is unsuccessful. This will help to ensure the sustainable use of scarce resources.
- 4.8.9 Although most students require accommodation during term time only, some residents may need a permanent home throughout their studies and development therefore should make provision of units for year-round occupation. To help ensure the viability of PBSA, the Council will provide flexibility to allow for the temporary or ancillary use of accommodation during vacation periods or term breaks. Proposals will be considered on a case-by-case basis. Planning conditions or legal agreements will be used to ensure that any temporary or ancillary uses do not result in a material change of use of the building.
- 4.8.10 The London Plan requires that at least 35% of PBSA should be secured as affordable housing. This is to ensure that students with an income equivalent to that provided to fulltime UK students by state funded sources of financial

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<sup>24</sup> e.g. For Monitoring housing purposes the London Plan indicates that 2.5 beds within PBSA = 1 C3 dwelling V C3 self-contained housing = 1 dwelling

support for living costs can afford to stay in PBSA. The definition of affordable student accommodation as set in the London Plan and its supplementary guidance will be applied. London Plan Policy H15 (PBSA) sets out the requirements regarding the delivery of affordable student units and should be referred for further information. Affordable rent levels may be subject to periodic review over plan period, considering any significant changes to the Government's student maintenance loan regime.

- 4.8.11 The Council will seek to prevent the loss of existing student accommodation, to ensure it does not adversely impact on existing capacity or existing residents, whose displacement could create additional pressure on the conventional housing market. However, flexibility will be applied where it can be suitably demonstrated that demand for the provision in question no longer exists. We will encourage the refurbishment of buildings to ensure student accommodation is brought up to an acceptable modern standard. Proposals will be supported where there is adequate re-provision of accommodation and compliance with other policies.

## Policy HO9: Large scale purpose built and conversions for shared living

*Linkages:*

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO9: Large scale purpose built and conversion for shared living**

- A. Proposals for large-scale purpose-built shared living (LSPBSL) and the conversion (or change use) of existing buildings for shared living<sup>25</sup> will be supported where they comply with London Plan Policy H16 and the following requirements:
- a) Proposals will be required to demonstrate how they are meeting an identified local housing need based on local incomes, rent levels and existing/future demographics of the Borough
  - b) Applicants will be required to demonstrate the affordability of the proposed LSPBSL products within their scheme compared with the alternative products within the Harrow private rental sector,
  - c) Proposals should be located within the boundary of the Harrow and Wealdstone Opportunity Area
  - d) There must not be two LSPBSL schemes within a 250m walking distance of each other to avoid an over-concentration of similar uses, unless robust evidence demonstrates the site will not be suitable or viable for appropriate alternative uses.
  - e) The LSPBSL scheme should not have a detrimental impact to;
    - i) Residential amenity of the neighbouring properties and surrounding area
    - ii) The character of the area
    - iii) The need to support and maintain mixed and inclusive communities
  - f) Proposals on sites with extant permission or allocated for self-contained dwellings will not be supported to avoid compromising the delivery of conventional housing to address future needs and targets, unless adequate evidence is submitted to demonstrate viability issues
  - g) The ground floor of the scheme should be designed and located to be active street frontage or public realm. It should provide:
    - i) Flexible workspaces,
    - ii) Public amenities (e.g. restaurants, cafes, leisure facilities) that are suitable for its location. These should be accessible to the wider public, to integrate it into the surroundings area, to support inclusive and sustainable communities.

<sup>25</sup> NB: Any references to the acronym LSPBSL within the policy and the supporting text will also apply to proposals for change of use/conversion of a building for large scale shared living

- h) To support a circular economy, proposals must demonstrate a flexible design and layout to allow the LSPBSL scheme to be converted/retrofitted to an C1 hotel or C3 self-contained residential uses, or other town centre uses (where appropriate) without the need for demolition and rebuild
  - i) Proposals must demonstrate satisfactory servicing arrangements are in place for deliveries, waste management and emergency vehicles and no adverse impact on the safe operations of the highway network, in line with other Local Plan Policies
  - j) The applicant must provide a management plan, to the satisfaction of the Council, to address the requirements of the Policy H16 of the London Plan and the Mayors London Plan Guidance on LPBSHL. This will be secured by way of a S106 agreement.
- B. The design and layout of LSPBSL schemes in terms of their layout, functional living spaces, level and type of communal facilities must be in compliance with the LSPBSL London planning guidance (LPG).
  - C. Affordable housing contributions will be required, in accordance with London Plan Policy H16.
  - D. The Council will resist any proposals that seek to reduce the quantity, type or restrict access to amenity provisions included within LSPBSL, after permission has been granted.

### Supporting Text:

- 4.9.1 Large-scale purpose-built shared living (LSPBSL) housing is a purpose-built managed rental development, with non-self-contained units comprising of functional private living areas with extensive communal spaces and facilities, under single professional management. They include a wide range of amenities to support a diverse community of residents and their needs.
- 4.9.2 They provide a housing option for households who cannot or choose not to live in self-contained homes, flat shares or HMOs and are often targeted at younger, single, high skilled professional individuals who may use this product on a transition basis until they find suitable long-term housing, as well as for those working within London part of the week or on a temporary basis. They can help add to the stock of rooms available for rent in the borough but are different from other rental products (such as HMO's, hostels) and LSPBLS can be less affordable than the alternatives. But they differ from other products in terms of the general size of rooms, the level/type of communal facilities and the arrangements for management/maintenance of the scheme.
- 4.9.3 LSPBSL could play some potential role to help free up the stock of other forms of accommodation, particularly family sized housing (three bed or more) that are highly required to address local housing needs during the Plan period. However, further research is required in this relation to the extent of this relationship, as LSPBSL products are a relatively new product in the private rented sector of the London housing market.

- 4.9.4 LSPBSL housing is a unique new form of development that seeks to address the demands of a niche subset of the housing market that do not fall within conventional C3 residential use, so policies are required to shape the delivery of these. This helps ensure LSPBSL are well designed, with adequately sized rooms, a sufficient quantity and quality internal/external communal areas and facilities; to enable future residents to fulfil their daily needs, interact with one another; and develop sustainable, cohesive communities, as well as promote their health and well-being. They may provide residents with increased security via a medium – long term tenancy agreement, to enable them to establish themselves, feel more connected to a locality, and be part of a community. Assuming LSPBSL schemes are well managed, maintained, they may avoid generic issues related to HMO properties, hostels, flat shares; such as a lack of/poor quality shared communal facilities and amenity facilities, insufficient parking spaces, lack of long-term tenancy security and transitory living, as well as the poor management/maintenance of properties. Policy can also seek to ensure future schemes are located within the most accessible locations to local facilities, services and avoid the potential loss of residential uses/permissions via speculative applications and an over concentration of LSPBSL and other similar uses.
- 4.9.5 The London Plan Policy H16 and Policy HO9 will apply to all proposals developments for LSPBSL and the change of use/conversions of buildings for shared living on, schemes that consist of at least 50 non-self-contained units. It should be noted that any shared living housing schemes below 50 units will be assessed against the criteria of Policy HO10: Housing with Shared Facilities.
- 4.9.6 The Draft Local Housing Needs Assessment did not identify any requirement to provide LPBSL accommodation to address any specific local housing needs, as a younger population (aged 25-44) and single households are not projected to increase during the Plan period and the Borough lacks a significant student population. Further, a significant level of future housing need is for larger family sized dwellings (three bed or more) or medium sized units that could potentially be occupied by families, as well as providing accommodation that is suitable for an ageing population. Further it states *“Whilst LSPBSL provides an additional housing option for some people, due to the unique offer of this type of accommodation, it does not meet minimum housing standards and is not therefore considered to meet the ongoing needs of most single person households in London”*.
- 4.9.7 Therefore, applicants will need to demonstrate their LSPBSL proposals will address local housing needs. This should include an assessment of the local rental rates, incomes of residents who are likely to reside within LSPBSL, current/future demographic trends, and any other relevant market factors (if necessary). Further, applicants will be required to demonstrate how the affordability of their proposed LSPBSL products compares with alternative products within the private rental sector of the housing market. This evidence will enable the Council to determine if there is a local need for LSPBSL product and if these products are the most appropriate way to address this need, as well as meeting other policies / objectives in the Local Plan, such as the

retention of family size housing rather than these being converted to HMOs. Further, it is important for policy to ensure LSPBSL does not compromise the delivery of conventional housing (i.e. sites with extant permission, allocations,) to address future housing needs and meet targets<sup>26</sup>. This approach prioritises the delivery of conventional self-contained housing to address the needs of families and low-income groups who require affordable housing, as well as avoids any potential harmful effects of any over concentration of LSPBSL on residential amenity or the mix of uses and balance of population in a neighbourhood.

- 4.9.8 In compliance with the London Plan, proposals for LSPBSL will be supported within the boundary of the Harrow and Wealdstone Opportunity Area, a significant part of which has a high public transport accessibility rating (5 -6) ). The Harrow Metropolitan and Wealdstone Town Centres and the Station Road Corridors, along with two main railway/tube stations and a bus station fall within the boundary of the Opportunity Area This is considered the most sustainable locations for accessing public transport, local services, facilities and pursuing employment opportunities. The Plan anticipates the Harrow & Wealdstone Opportunity Area will accommodate a significant level of housing and employment growth. This is considered the most suitable locations for accommodating 50 or more units LSPBSL schemes and the supporting communal facilities required to deliver functional living spaces, whilst minimising any potential harmful effects on the character areas of the Borough and ensuring viability. It should be emphasised that LSPBSL developments generally require a significant level of units to be delivered within a scheme, at a sufficient scale, in order to benefit from economies of scale and cover the cost of providing/servicing communal facilities and managing the development to an acceptable standard, as well as ensuring viability. Therefore, LSPBSL tend to be built at high densities on sites that are of a small size and are likely to require 4 or more storeys development. In contrast, the predominate character of the Borough is two -three storeys in suburban locations and three to four storeys with the town centres and near transport hubs. This means LSPBSL schemes are unlikely to be suitable or viable in locations outside of the Opportunity Area due to the lack of available larger sites and their potential adverse impact on the character of the Borough, particularly in suburban locations.
- 4.9.9 This policy requires that two or more LSPBSL schemes should not be located within a 250m distance of each other (i.e. existing permissions, constructions, completions) in order to avoid an over-concentration of such uses that could have a detrimental impact on residential amenities, the character of the surrounding area, the diversity and mix of uses, as well as the objective of promoting mixed and inclusive communities. Further, the potential over-delivery of LSPBSL products will compromise the delivery of conventional self-contained residential accommodation which would fully address local housing needs, particularly for increasing the delivery of family sized and affordable housing, as well as have an adverse effect on achieving, balanced mixed and inclusive communities. Proposals that do not comply with this requirement, will

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<sup>26</sup> .e.g. 1.8 beds of non-self-contained housing such as LSPBSL= 1 C3 unit for monitoring purposes

be required to provide robust evidence to demonstrate no appropriate alternative uses would be suitable and viable on their site, based on factors such as the location of the site, the character of the surrounding area and local needs. This also helps avoid a potential oversupply of LSPBSL accommodation that could have adverse economic and social impacts for the Borough, and allows the Council to monitor the locations and potential impacts of this new product during the Plan period.

- 4.9.10 Applicants will be required to submit a satisfactory Management Plan in line with Policy H16 of the London Plan and the Mayor London Planning guidance, which will be secured via a S106 agreement. This will cover matters such as the need to demonstrate adequate operational arrangements, how spaces will be maintained, and how the scheme will function as a high quality LSPBSL, as well as measures to mitigate any potential harm to the amenities of future residents and neighbouring properties.
- 4.9.11 Applicants must refer to and ensure consistency with the London Plan Guidance for LSPBSL in relation to the design and space requirements, rooms sizes (including accessible units), the level/type of communal areas/facilities required and layouts. The private rooms must provide a satisfactory personal functional living space and environment for the health and well-being of residents. Each personal room should include a window with an adequate level of natural sunlight and ventilation. The units within the scheme should not be used or be capable of being used as self-contained residential accommodation.
- 4.9.12 Proposals must ensure a sufficient level and type of internal communal space is provided for the number of private units proposed within a LSPBSL scheme, given the relatively small size of private space and potentially a high number of residents residing and using these. An adequate quantity of kitchen facilities, dining and lounge areas are an important component of shared living. These should be well designed and highly accessible, to meet the needs of all users. They should enable residents to fulfil their day-to-day needs, interact, socialise with their neighbours, develop healthy relationships and build a diverse, inclusive and cohesive community. Communal spaces should provide a range of amenities that facilitate health and wellbeing, supporting a diverse community and address their daily needs. Applicants must provide evidence to demonstrate how communal areas/facilities are designed to enable incidental meetings, socialising and interaction between residents, fostering positive friendships, relationships and a sense of community.
- 4.9.13 Applicants will be required to provide some flexible workspace within the ground floor a scheme, as the opportunity to provide commercial floor space are limited due to the constrained nature of the Borough. This will provide some workspace for the internal residents and surrounding community, particularly for SME's, as well as help to create commercial networks, attract investment, create additional jobs, boost economic growth and help achieve the Borough's economic objectives. Flexible workspace is important for the successful operation of LSPBSL schemes, as internal (and external) residents increasingly require a spacious space, appropriately sized and lighted space

to work from remotely, in addition to their private rooms. Further, public amenities (i.e. café, restaurant and leisure facilities such as a gym) should be provided in suitable locations that are accessible to the wider public with active frontages on the ground floor of the scheme, to avoid creating closed communities and integrate the scheme into the wider area.

- 4.9.14 LSPBSL schemes fall within a sui generis non-self-contained market housing use. Both the functional private living areas and communal areas/facilities should be designed and planned to be used integrally by future residents at the outset. These schemes should not be used to provide a mass quantity of poor-quality mini self-contained living units as an alternative to providing well designed, high quality C3 residential dwellings. Any applications for change of use to convert these schemes to C3 residential use at a later date can be very challenging. To effectively achieve this, applicants will be required to demonstrate they have considered different layouts at the design stage for a scheme, to enable it to easily be converted to conversion to a C1 hotel or C3 residential use (or an appropriate town centre use) in the future, if any unforeseen adverse market conditions arise (.e.g. lack of demand for the product, development viability), as well as help encourage the efficient use of resources, reduce waste, promote the circular economy and work towards the achievement of net zero carbon target, in line with Local Plan Policies 08 and CN10.

## Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

*Linkages:*

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)**

Development proposal for Houses in Multiple Occupation (HMO)<sup>27</sup> and Hostels with shared facilities in the Sui Generis Use Class will only be permitted, providing they comply with the criteria below:

- (1) The internal floor area of the dwelling should exceed 130m<sup>2</sup> (as originally built)
- (2) It is located within an area that has a PTAL rating of 4-6 with good access to public transport, local services and facilities.
- (3) It should not be located within a residential street or area that is characterised by family housing
- (4) There should be no harmful impact on the amenity of occupiers of neighbouring properties and the character of the area.
- (5) Adequate arrangements are made for the provision of amenity space for future occupiers in terms of access to gardens and communal facilities and areas.
- (6) It is well-designed, high-quality accommodation with rooms of an adequate size for their purpose, having regard to internal space standards (set out in the London Plan and supporting guidance) with adequate functional living spaces and layout.
- (7) Ensure an adequate level and type of ancillary facilities such as kitchen areas, WC's, storage space and communal areas for lounging, dining are provided to address the daily needs for the proposed number of occupants
- (8) Adequate arrangements are made for the storage and collection of waste and recycling material generated by future occupiers of the development, which does not give rise to nuisance to future occupiers and neighbouring properties or a detrimental impact upon the streetscape.
- (9) It should ensure all habitable rooms have a satisfactory environment in terms of privacy, daylight, sunlight, outlook and exposure to external noise.
- (10) It ensures a balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard surfaced) that does not detract from the appearance of the property or the street scene.
- (11) Adequate provision is made for car parking and safe access to property and does not result in a harmful cumulative increase on street parking (in compliance with policy M2 Parking) or the safety of other road users.
- (12) It contributes to creating an inclusive community and would not result in the over concentration of HMOs/Hostels within a neighbourhood that would harm

<sup>27</sup> NB: This Policy will also apply land use class C4 (and any subsequent updates to use class orders), if the Council introduce an article 4 during the Plan period (.i.e. a small HMO housing 3-6 people)

the mix, balance and well-being of communities. For HMOs, an over concentration is defined as an instance where three or more of the nearest ten properties are HMOs, (i.e. 5 on each side of an application site, on the same side of the highway).

- (13) The Council will resist proposals that result in the loss of good quality hostel accommodation that address a specific local need for vulnerable members of the community, unless one or more of the following apply:
- a. It is demonstrated there is no local need for the type of accommodation.
  - b. It is for a replacement provision at an equivalent or better standard.
  - c. It is demonstrated to be unviable or unsuitable for addressing the needs of its users.
  - d. The replacement provision is addressing a more acute local need (e.g. affordable housing).

### **Large Purpose-built HMO developments**

- (14) The Council will resist proposals for new large purpose-built HMO developments, as these are not considered the most appropriate approach to meeting housing needs in the borough and can result in a poor-quality living environment for the occupants and potentially significant harmful amenity impacts on the surrounding area. On sites where the Council considers that large purpose-built HMO developments may be an acceptable form of housing in principle, proposals must:
- a) Be located within an accessible location to local facilities, services, transport in accordance with criteria 1
  - b) Not result in the loss of housing that is suitable for accommodation by families, in accordance with criteria 2 above.
  - c) Prevent any harmful amenity impact(s) on the surrounding neighbourhood and the character of the area (in accordance with criteria 3). Sufficient evidence – including a detailed management plan – must be provided demonstrate this.
  - d) Result in a well-designed and satisfactory living environment for its occupants in line with criteria 4-10 above
  - e) A sufficient level and type, of communal facilities and spaces should be provided to adequately address the needs of the expected number of occupants. Communal facilities and spaces should not be located in too few locations, should be conveniently accessed and be designed to encourage incidental meetings, socialising, lounging and recreation between residents to foster friendships and a sense of community.
  - f) Not result in an over concentration of similar uses and the achievement of mixed, inclusive communities in line with criteria 12

### **Supporting Text:**

- 4.10.1 A house in multiple occupation (HMO) is a form of residential accommodation that is occupied by unrelated persons who share amenities such a kitchen, bathroom, etc and form two or more households. A household is generally a family (or people with relationships similar to a family), including single persons and co-habiting couples. There are two main planning use classes for

housing with shared facilities: a Use Class C4 HMO that is a ‘small’ HMO used by 3 to 6 unrelated people, and a ‘large’ HMO shared by more than 6 unrelated people is a Sui Generis use<sup>28</sup> (i.e. does not have a specific use class). For the purposes of this policy a hostel includes a building providing temporary non-self-contained residential accommodation with an element of supervision, but with no significant degree of care. Hostels are a sui generis use.

- 4.10.2 A permitted development right exists to convert/change the use of residential accommodation (C3 use) into a ‘small’ HMO (use class C4). In contrast, planning permission is required for the use/development of land and buildings for large HMOs in a Sui Generis use. This allows the council to consider issues such as access, design, parking, location and impacts on the character and amenity of surrounding area and neighbouring properties. All HMOs require a mandatory licence from the Council, which is outside of planning controls. This ensures HMOs are built and maintained / operated to a certain standard (e.g. room sizes, number/type of communal facilities, health and safety) and well managed but mandatory licencing does not allow the Council to assess potential amenity impacts on the neighbouring properties and surrounding area, as well as location factors.
- 4.10.3 HMOs can provide a valued source of affordable accommodation in the stock of housing providing they are of high-quality design and provide good quality living standards and adequate space for people to live in. They are particularly important addressing the housing needs of:
- (a) Young and transient groups of the population, who have not reached a stage where they can or want to buy;
  - (b) Vulnerable people and those on lower incomes who are unable to gain access to other forms of housing (e.g. self-contained accommodation)
  - (c) People who would otherwise be homeless without bedsit types of accommodation, as they cannot afford to rent or buy a property as a single household.
- 4.10.4 The London Plan (2021) acknowledges the role that HMOs play as a strategically important part of the Capital’s housing offer, with a provision that helps to meet distinct needs and reduces pressure on other elements of the housing stock.
- 4.10.5 The Draft Local Housing Needs Assessment (2022) indicates that the size of the private rented sector has significantly increased since 1991 and HMOs have been particularly important for addressing the needs of the younger population due to the increased pressure on the stock of social housing and rising levels of rents. Further, it indicates that the number of sharing households aged between 25-44 years and single person households are not projected to experience any significant growth during the Plan period. Despite this, large-scale purpose-built shared living (LSPBSL) (see Policy HO9) may

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<sup>28</sup> The above provides a summary of HMOs and the full legal definitions should be referred as appropriate, as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended). There are separate definitions in respect of the legal licencing of HMOs as set out in the Housing Act 2004 and related secondary legislation.

have the potential to play a role in reducing the pressure for family size housing to be converted to HMOs (subject to further evidence). The policy above reflects these two factors by seeking to resist the conversion of family-size housing to HMOs. It however also recognises that HMOs offer a more affordable form of shared living for those who cannot afford any other alternative and are unlikely to be offered accommodation in affordable housing (i.e. single persons).

- 4.10.6 There are concerns that a high concentration of HMOs can have a cumulative harmful impact on neighbouring properties and the surrounding area. The key reasons include the potential negative impact of the potential loss of family housing and the increased number of families having to reside in unsuitable accommodation (i.e. smaller overcrowded dwelling with a lack of satisfactory amenities, poor location), a transient population replacing settled family occupants, reduction in environmental quality, loss of character, waste management, overcrowding, increased anti-social behaviour and noise/disturbances, changes in supporting infrastructure such as shops, pressure on parking, and sustaining balanced, mixed and inclusive communities. HMOs can also push up rents or inflate the price of properties for sale that would otherwise accommodate families. Therefore, it is important for future policy to seek to address and minimise these potential harmful impacts.
- 4.10.7 In general accordance with the London Plan (2021), this policy seeks to facilitate HMO conversions, which intensify the use of existing premises, within the most appropriate locations that have good access to public transport, local services and facilities (i.e. PTAL 4-6). This in turn promotes the use of sustainable modes of transport, reduces the need to travel by private car. It also reduces the potential risks of harmful effects such as the need for higher levels of hard standing areas for car parking that can result in the loss of biodiversity/soft landscaping in front gardens and increased surface water run-off. Managing the locations of HMO's also assists in mitigating negative impacts on the character of the Borough and the potential loss of larger housing in areas that are characterised by family housing.
- 4.10.8 To ensure that HMOs are built, maintained and managed at an acceptable standard, the Council operates mandatory and additional licencing schemes, in accordance with housing legislation. Through this regime the Council has published the Harrow Standards for Licensable HMOs<sup>29</sup>. All development proposals for HMOs must be well designed in terms of their layout and functional living areas. An adequate level of rooms must be provided of appropriate sizes in line with the internal space standards included within the London Plan. A sufficient level ancillary facilities (W/C, kitchen and storage areas) facility; as well as a range/level of communal areas/facilities; should be provided in order to address the needs of the proposed number of occupants. Applicants should also consider any standards and requirements of the Council licencing regime.

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<sup>29</sup> Applicant should refer to the HMO standards in the link below or any subsequent equivalents to this.  
<https://www.harrow.gov.uk/downloads/file/23800/hmo-standards-and-regulations.pdf>

- 4.10.9 As the other sections of the Plan (e.g. housing size mix, conversion policies) have emphasised, the Draft LHNA indicates there is a high priority to increase the delivery of family sized housing to address the future local housing need. The Local Plan evidence indicates that the potential scope to achieve this may be constrained by the size, type and location of sites that may come forward during the Plan period. These factors have resulted in housing affordability issues for young and low-income households. Therefore, the policy introduces a number of measures to protect the existing stock of family sized housing. It seeks to retain smaller sized family housing (below 130m<sup>2</sup>) as conversion of this housing to HMOs is likely to result in poorly designed accommodation and living environment for HMO tenants and the loss of the lower cost family housing stock. This policy allows the potential conversion of dwellings into HMOs providing the applicants demonstrate the location of the application site is not characterised by family housing. In relation to this, a recent legal judgement for a challenge to a decision clarifies that the assessment of whether a location/street is characterised by family housing should not be limited to the physical appearance of the built environment/premises and can also consider factors like occupancy and uses. Further, proposals have to be within the most accessible locations.
- 4.10.10 The open, green quality of the suburban environment is part of Harrow's historical appeal. This has been impacted by hard landscaping to mainly accommodate cars in front gardens and to a lesser extent manage and store waste. This has reduced the level of incidental green infrastructure, which has affected the visual quality of the environment, biodiversity and surface water run-off. Therefore, the design of proposals should consider appropriate levels of well-designed soft landscaping and urban greening to protect and enhance biodiversity, in line with Local Plan policies. In addition, the accommodation of bins within the site requires careful attention. The provision of bins within private amenity spaces usually offers the best solution in terms of householder responsibility for use, maintenance and waste segregation, and helps to avoid the excessive accumulation of bins on forecourts. Any alternative solution may be acceptable in exceptional circumstances such as a storage shed on the forecourt/front garden of a property, providing it is well designed in terms of its location and materials and includes an appropriate level of soft landscaping to adequately screen it from the street and protect the character of the area. Applicants should also review the Council's future Waste Strategy and ensure compliance with the requirements of this, particularly in relation to ensuring waste vehicles can access the property and the waste area being kept clean and clear.
- 4.10.11 Applicants will be required to demonstrate adequate consideration of design, layout, privacy and amenity issues, to ensure a satisfactory living environment for the occupants and minimise risks of any harmful effects on neighbouring properties. Proposals must ensure all occupants have an obstruction free, convenient access to communal amenity areas and facilities; such as kitchens, bathrooms, WC's and gardens. In relation to addressing issues such as waste management, car parking and hard/soft landscaping proposals must ensure measures to address these issues do not result in any harmful impacts

on the occupants of the premises, neighbouring properties and the character of the area.

- 4.10.12 New HMOs should contribute positively to their local area and an appropriate distribution of different types of housing provision across the Borough, along with the protection of the character and amenity of immediate and neighbouring properties. To assess the potential for over-concentration HMOs within a location, a simple policy approach will be applied that seeks to allow no further HMOs where three already exist in the ten nearest adjacent properties to the application property. This is measured taking the nearest front entrances when walking from the front door of the application property on the same side of the highway (i.e. 5 properties on either side of application site). Landlords will be expected to register properties in conformity with the council's licensing scheme.
- 4.10.13 Certain types of hostels providing accommodation are important and necessary uses for increasing housing choice and to meet specific forms of housing need. Therefore, the policy seeks to prevent the unnecessary loss of these hostels to other uses, unless proposals comply with the criteria.
- 4.10.14 The Council will resist proposals for large purpose-built HMO developments, as the Local Housing Needs Assessment did not indicate any significant growth in the younger population (25-44) or single households, and the priority is to increase the delivery of conventional self-contained C3 family sized housing and affordable housing. Large purpose-built HMO developments can result in a poor-quality living environment with inadequately sized rooms; insufficient quantity and type of communal facilities; and a lack of secure tenancy, which can have a negative effect on the health and well-being of residents. They also encourage a transient population and the poor maintenance and management of the scheme, along with a potential over concentration of HMO's within a given locality, can have significant harmful impact on HMO occupants and residents in the wider neighbourhood.
- 4.10.15 Large purpose-built HMO developments may be acceptable if they do not result in the loss of accommodation suitable for families, there are no harmful amenity impacts on the neighbouring properties and they can demonstrate compliance with the criteria included in the above and other relevant policies. A sufficient level of evidence – including a detailed management plan - must be provided to demonstrate adequate operational arrangements, how spaces will be maintained, and that the scheme will function as a high-quality development, as well as the measures to mitigate any potential harm to the amenities of future residents and neighbouring properties.

4.10.16 During the plan period the Council will monitor the locations where new HMO properties are delivered (via the licenced and application route), the potential impacts of these on specific locations of the Borough and their implications for addressing local housing needs. Depending on the outcome of this, the Council may consider whether an Article 4 direction should be introduced to remove the permitted development right that allows residential dwellings to be converted to small HMO uses without the submission of a planning application. It should be emphasised that National Policy has strengthened the test for introducing an article 4 direction and limits its geographic scope. It indicates this should *“be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area; be based on robust evidence, and apply to the smallest geographical area possible”* (Para 52, NPPF 2023).

## Policy HO11: Self-build and Custom build housing

### Linkages:

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO11: Self-build and Custom build housing**

- 1 The Council will keep a register of those seeking to acquire serviced plots in the Borough for their own self-build and custom-build house building. It will also work with stakeholders to explore potential options to identify and bring forward suitable serviced plots to help meet the needs of self-build and custom-build housing, particularly where this will help increase the delivery of affordable housing and family housing.
2. Development proposals for self-build or custom-build housing will only be supported, providing:
  - a) It meets an identified need for self-build or custom housebuilding as identified on the Harrow self-build and custom housebuilding register
  - b) The size mix of units should consider Policy HO1 Dwelling size mix and the high priority for increasing the delivery of family sized housing (three beds or more) to address local needs
  - c) The scale of proposed development and locations on a site below 0.25ha must comply with the small sites policy (HO3)
  - d) It is in accordance with policies relating to matters such as optimising housing output, high quality design, amenity space, car parking, affordable housing and other relevant Development Plan Policies
3. Proposals for community-led housing will be supported, (via the self-build and custom build housing or other delivery models), in appropriate locations where:
  - a) A local need for this type of provision is clearly established;
  - b) Optimal use is made of the site, contributing to the delivery of the strategic housing target (including in relation to the mix of unit sizes), with a development density that is appropriate to the site and character of the area, having regard to other policies in the plan;
  - c) Provision is made for affordable housing; and
  - d) The scheme is designed to a high standard (including sustainable design principles), integrates adequate amenity space, and makes a positive contribution to the local neighbourhood.

### Supporting Text:

- 4.11.1 Self-build and custom-build housing is built or commissioned by individuals, or associations of individuals, for their own occupation. This type of development can provide a more affordable route to home ownership than

other options available, such as 'built for sale' market housing. Self-build generally refers to people who apply their own skills in the design and construction process or hire professionals for this purpose and manage this. Custom-build involves the outsourcing of industry professionals, often for bespoke or innovative schemes. For a scheme to be categorised as a self-build or custom build housing, the Council must be satisfied that the initial owner(s) of the home has had primary input into its final design, the layout of the house and that the completed house will be occupied by the initial owner. Self-build and custom-build housing units provide an additional source of supply of conventional housing and further housing choice and will therefore be considered as housing in the C3 Use Class for policy implementation.

4.11.2 The Council has a duty under the Self-Build and Custom Housebuilding Act 2015 and Custom Housebuilding (Register) Regulations 2016 to keep a register of those seeking to acquire plots for self-build and custom-build housing in the Borough and to have regard to this register in its planning and housing functions. The register forms part of the Local Plan evidence base. It provides an indication of the demand for serviced plots from individuals or groups who meet specific eligibility criteria. Harrow's self-build and custom housebuilding register is divided into two parts:

- (a) Part 1 keeps track of local demand for self-build and custom housebuilding (i.e. those who meet the local connection test) which must be met via the grant of sufficient development permissions for serviced plots of land over a given period.
- (b) Part 2 keeps track of general demand for self-build and custom build, with no requirement to grant sufficient development permissions for serviced plots of land to meet this demand.

4.11.3 Recent amendments to the Self-build and Custom Housebuilding Act 2015 indicates that Local planning authorities must give sufficient permissions for self-build and custom housebuilding on serviced plots to meet the demand for such development in their area over a given period. This means planning permissions only qualify towards meeting demand for self-build and custom build housing, if it was designed for this purpose.

4.11.4 Identifying suitable sites for self-build and custom-build housing in Harrow will remain a challenge as a result of the limited (and often constrained) supply of land to meet the needs of a growing population. To date, there has been limited interest for self-build and custom build housing plots in terms of the number of individuals or association of individuals who have registered an interest in these types of housing delivery. The CIL relief claims data indicates 64 units of self-build housing units were completed between 2016 -24 and no serviced plots for self-build/custom build housing have come forward for development. Key reasons are that the Borough is a high land value area with a high level of demand from other house builders, which makes it more difficult to secure funding and less viable to build at lower densities to provide small plots for housing. Further, a large proportion of past supply of new housing has been derived from high density flatted development from the redevelopment of previously developed sites within close proximity to town centres or stations, rather than low density housing plots that are more

suitable for serviced plots for self-build/custom building housing schemes. As self and custom build homes are regarded by mortgage lenders as non-standard homes, obtaining a mortgage for these can be challenging and therefore this type of development is more reliant on self-financing.

- 4.11.5 Development proposals for self-build and custom-build housing must use the design-led approach to ensure high quality development that responds positively to the locality, optimises the capacity of sites, and supports the delivery of the spatial strategy for the Borough. Applicants should clearly identify whether any elements of the design may require adaptation or alterations, based on owners' input. This will help the Council to work with applicants to respond to the unique challenges facing self-builders and to ensure schemes are policy compliant. Provision for affordable housing will be required for major development (i.e. 10 or above units) in line with other Local Plan policies.
- 4.11.6 Community led housing is a growing trend in London, both being driven by Community Groups supported by the Mayor of London (Community Led Housing Hub) and by the Council that has been working to bring two community led projects forward. Community led housing can take several forms including housing co-operatives, Community Land Trusts (CLTs), cohousing, and self/custom build housing. These approaches are not mutually exclusive, and in many cases a mixture of approaches may be employed in the setup and running of community led homes to suit specific circumstances. This type of development demonstrates our commitment to seek to meet demand within the borough, and we will continue to monitor our register in line with the relevant statutory requirements.
- 4.11.7 Community led housing can provide a more affordable route to home ownership and has the potential to build more cohesive communities and allow for specific uses to be explored. There is a demonstrable demand in Harrow to go beyond what the market or the council can deliver in terms of housing affordability and typology.
- 4.11.8 The Council maintains a brownfield register. This helps identify opportunities for self-build and custom build homes and possibly community led housing schemes on previously developed sites. The supply of self and custom build plots is typically very small scale, usually infill between existing dwellings and vacant/underutilised sites such as garage courts and car parks. In other countries however, groups of self-builders come together to deliver larger schemes, or it is common for service plots to be sold in the market. The Council will consider potential sites for self-build and custom build housing if they are submitted through Call for sites consultation. The Council will monitor the delivery of self-build and custom-build housing, as well as will work with stakeholders to bring forward potential sites (if opportunities arise) to increase the delivery of affordable housing and family sized housing in order to address local needs.

## Policy HO12: Gypsy and Traveller Accommodation Needs

### Linkages:

*NPPF Chapter 5: Delivering a sufficient supply of homes*

*NPPF Chapter 11: Making effective use of land*

*London Plan Chapter 3: Design*

*London Plan Chapter 4: Housing*

### **Policy HO12: Gypsy and Traveller Accommodation Needs**

1. The Council seek to retain the existing Gypsy and Traveller site at Watling Farm (1.07ha) to provide up to 12 additional pitches (provisional), to address future traveller needs between 2022-32.
2. The Council will support proposals for Gypsy and Traveller accommodation, including sites and pitches, providing they are of a high-quality layout and design and contribute to meeting identified local needs, and there is no capacity at the existing site at Watling Farm.
3. Proposals for new and replacement accommodation must make adequate provision for:
  - a) A suitable and safe access to and from the site, with sufficient space for the manoeuvring of vehicles
  - b) Satisfactory access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services
  - c) Basic amenities, including running water, sewerage/ drainage and waste management
  - d) A site location that is well-integrated into the locality with reasonable access to local shops, services and community facilities including education, health and public transport
  - e) Facilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, and amenity space and play areas
  - f) Appropriate landscaping and planting to address impacts on amenity and enable integration of the site with the surrounding environment.
  - g) Measures to minimise any potential impacts on the local environment, including any relevant policy designations within proximity to the site that would restrict its use for any type of housing (including but not limited to: Green Belt, Metropolitan Open Land and Sites of Nature Conservation Importance) and the character of the area including visual and amenity considerations
4. Applicants must take account of any potential flood risk and the impacts of climate change when assessing the suitability of a site

5. Development proposals for Gypsy and Traveller accommodation must not pose a risk to public health and safety, and not adversely impact the amenity of site occupants and neighbouring properties

### Supporting Text:

- 4.12.1 The National Planning Policy for Traveller Sites (2015), which sits alongside the NPPF, sets out the Government's aim to ensure fair and equal treatment for travellers in a way that facilitates their traditional and nomadic way of life, whilst respecting the interests of the settled community.
- 4.12.2 The Watling Farm Gypsy and Traveller (G & T) site is a Council owned. It is, circa a 1.07ha and contains two G & T pitches on it. It located on the northern edge of the Borough boundary with Hertsmere Borough Council. Its southern boundary is within proximity to the Royal National Orthopaedic hospital.
- 4.12.3 The Greater London Authority (GLA) commissioned external consultants to undertake a Gypsy and Traveller Accommodation needs Assessment (GTANA) for the Greater London area, to assess the future pitch needs of Gypsy and Traveller households based on the definitions included within the London Plan and Planning Policy for Travellers (PTTS 2023). Both definitions include those households who have ceased travel either temporarily or permanently due to factors such as health, education or old age, but the London Plan definition is broader as it considers other reasons for seizing travel.
- 4.12.4 The provisional findings of the study have been provided to the Council. These indicate that between 13 (cultural definition) and 12 (PTTS definition) additional pitches are required (after deducting the two existing pitches) to address the future accommodation needs of Gypsy and Traveller households, over a ten year period. This also considered the needs of Gypsy and Traveller households who reside bricks and mortar accommodation and have a cultural aversion to this. The Council is proposing to provide up to 12 additional pitches based on the PPTS Gypsy and Traveller definition (2023). This has been updated, since the Draft Local Plan Regulation 18 document was published; to ensure Gypsy and travellers households are treated equally and fairly through the planning process. The GLA are intending to publish the final GTANA document by the end of 2024, and the Borough pitch need figures may be subject to change, based on this.
- 4.12.5 The Government's Planning Policy for Traveller Sites (PPTS) suggests the use of a criteria-based policy for any unknown households that do provide evidence that they meet the PPTS planning definition. This enables the Council to proactively plan for Gypsy and Travellers' accommodation needs, ensuring that new sites are well designed; well-connected to social infrastructure, health care, education and public transport facilities; and contribute to a wider, inclusive neighbourhood. As noted above, the current site has an historic permission for up to 15 pitches, significantly more than current identified needs; it is not envisaged that an additional site will be

required during the plan period unless updated evidence indicates insufficient capacity at the existing site.

- 4.12.6 Any new proposed Gypsy and Traveller sites will need to provide a safe and acceptable living environment essentially consistent with the characteristics expected of mainstream housing and ideally forming part of a wider balanced and mixed residential community. This includes having good access to social infrastructure to help address recognised disadvantages in relation to educational attainment and health/life expectancy that members of the Gypsy and Traveller Community have experienced. Nevertheless, there should also be consideration of particular needs such as ability of work vehicles and homes to access the main road network and facilities that support employment. The Council aims to further Harrow's reputation as a place that welcomes diversity. Therefore, the design and layout of Gypsy and Travellers' sites, particularly at their edges, should look to integrate well with its surroundings and promote opportunities for positive interaction with the adjacent townscape and associated communities.



## Chapter 05: Local Economy

## Strategic Policy 04: Local Economy

*Linkages:*

*NPPF Chapter 6: Building a strong, competitive economy*

*NPPF Chapter 7: Ensuring the vitality of town centres*

*London Plan Chapter 1: Planning London's Future – Good Growth*

*London Plan Chapter 2: Spatial Development Patterns*

*London Plan Chapter 6: Economy*

### **Strategic Policy 04: Local Economy**

- A. The Council will ensure sufficient employment floorspace is provided to enable a strong and flexible economy that is adaptable to changing circumstances whilst positively contributing to the wider London economy.

#### **Town Centres, Offices and Retail Floorspace**

- B. The Council will support proposals that demonstrably contribute to the vitality and viability of the local economy by:
- a. Supporting appropriate developments and uses that support the role and function of the hierarchy of town centres;
  - b. Continuing to focus appropriate town centre development in the Harrow Metropolitan Town Centre primary shopping area;
  - c. Assisting in meeting the evidenced floorspace needs for the borough across the plan period;
  - d. Providing for a range of uses appropriate to their locations in both size and use class;
  - e. Supporting proposals that are flexible / adaptable to meet appropriate employment uses, and to make best use of space including temporary meanwhile uses;
  - f. Supporting proposals that seek to intensify employment floorspace; and
  - g. Supporting mixed use developments in appropriate locations or where supported by a masterplan approach.

#### **Industrial Land and Premises**

- C. The Council will ensure sufficient provision of industrial floorspace and premises through:
- a. Meeting the identified floorspace need across the borough over the plan period;
  - b. Supporting intensification, modernisation and, where feasible, the environmental performance of industrial floorspace and premises;
  - c. Safeguarding Strategic Industrial Land & Locally Significant Industrial Sites by prioritising Use Class B2, B8 and related Sui Generis Industrial Uses; and
  - d. Seeking to direct Use Class E(g) (ii) & (iii) activities to appropriate and sustainable locations outside of SIL and LSIS premises.

**Local employment and business opportunities**

- D. Ensure that where possible, new development benefits local business through local labour and supply chain opportunities.

**Supporting Text:**

- 5.0.1 Across Harrow, employment land is predominately located within designated town centres, local neighbourhood parades, and across industrial land (SIL/LSIS/undesigned sites). These established areas remain the appropriate locations for employment and provide opportunities for residents of Harrow to work locally or set up their own business. Outside of these areas, existing uses or institutions may provide opportunities to cluster increased employment floorspace to support their ongoing success and function. The Council will work with such uses or institutions to be understand their needs and work to assist in delivering the appropriate floorspace to assist with meeting their needs. The Council will continue to work towards implementing its Economic Strategy where it assists in delivering against the targets set out in the London plan, but also job creation across the wider borough.
- 5.0.2 Employment floorspace and how it is used has changed dramatically over the last decade, with changes to shopping habits, such as online purchasing and ease of delivery / returns of goods. This has led to a reduction in the need to physically visit many of the traditional shopping outlets, such as high streets and shopping centres. There has been a notable impact on the way in which town centres are used, and what role they now play in terms of being a destination for retail and leisure. Compounding this, the Coronavirus pandemic exacerbated impacts on struggling businesses which relied upon footfall traffic, and in many cases resulted in business closure. The Harrow Economic Needs Study 2023 however sets out that Harrow Metropolitan Town Centre and Harrow's District Centres have not followed this trend, with vacancies below the national average. However, the churn in shops has been positive in Harrow Metropolitan Town Centre, with new shops outnumbering closures, which again is supported by the vacancy rates noted above.
- 5.0.3 Given the recent changes set out above, it is not yet possible to fully understand if the short-term impact will continue into the medium and longer term. The Council will continue to monitor changes to the economic climate and the floorspace requirements across the Borough.
- 5.0.4 Harrow Council has undertaken relevant evidence base work to determine the amount of employment floorspace is required to meet the needs of the Borough to cover the Local Plan period to 2041. The West London Economic Land Review 2021/22 provided an update to the West London Employment Land Evidence (WLELE) Study (2019) and sets out an update to the employment projections and resulting land requirements. Specifically, this evidence base relates to industrial employment floorspace, with the projections set out below (with commentary in relation to the Coronavirus pandemic).

- 5.0.5 The Harrow Economic Needs Study (ENS) for Town Centres and Offices was completed in January 2024, and provides a quantitative and qualitative assessment of the needs for new retail, leisure and other main town centre uses within the Borough. The report also provides an office market update to the Economic Development Needs Assessment (EDNA) 2017.
- 5.0.6 The evidence base has set out that over the plan period, the following floorspaces will be required:
- (a) Combined retail, food / beverage, leisure and entertainment - 13,900sqm
  - (b) Industrial – 6,000sqm
- 5.0.7 Over the plan period the Council will continue to closely monitor and review land supply and demand for all employment floorspace and premises.

#### *Harrow Town Centres*

- 5.0.8 The Economic Needs Study (2023) sets out quantitative and qualitative assessments of the need for new retail, leisure and other main town centre uses within LB Harrow, which will meet the needs across the plan period to 2041. It also provides an office market update to the EDNA (2017), in particular the commercial property market conditions of the office market and employment land availability. This includes an assessment of current office market conditions within Harrow, London and national markets more widely, and a reappraisal of floorspace and land supply to determine an updated demand/supply balance position.
- 5.0.9 Town centre employment floorspaces can provide opportunities for multiple occupiers over a 24hr period. Some uses that operate during the day, may be in a position to operate as a different use into the evening. Where this is practical, it can contribute to businesses sharing some of the costs associated with running a business. By supporting this, further footfall and dwell time is encouraged into town centres, whereby potentially contributing to the vitality and viability of the centre. Where planning permission is required for any change of use, planning statements supporting any application must set out clearly separate uses within the space and how they would be managed.
- 5.0.10 In September 2020 the Government made significant changes to the Use Class Order, which resulted in formerly separate use classes being merged into a single class ('E Use Class'). Of specific note, E Use Class now includes uses that were formerly in separate use classes, such as retail, financial & professional services, medical, indoor recreation, office, research & development, and light industrial. This changes how employment land is managed and represents a shift away from traditional retail dominant areas. Notwithstanding this, town centres will remain a focal point for retail and an area where footfall is encouraged with a range of experiences for the local community to visit and spend time in.
- 5.0.11 The development of experiential retail is likely to be essential to the longer-term sustainability of many town centres. This typology requires visits to a physical space rather than online purchasing and requires more interaction

with the town centre. The Local Plan provides a flexible approach to use classes within the town centre locations, setting out that main town centres uses<sup>30</sup> are appropriate.

- 5.0.12 The vacant units across Harrow's town centres are likely to be capable of accommodating floorspace need. The amount of vacant floorspace across the designated town centres equates to approximately 14,000sqm, and with an average vacancy rate of 6% (significantly below the UK average of 14.5%), meaning the projected demand can theoretically be met. In the event that the Borough's shop unit vacancy rate was to reduce to around 4%, this reduction in the shop unit vacancy rate could still theoretically accommodate over 10,000sqm of new uses, exceeding the projected combined retail and food/beverage floorspace under-supply up to 2036 (8,500sqm gross).
- 5.0.13 In Harrow, the demand for office space has continued to decline since the pandemic, while availability of leasable space has risen in tandem.
- 5.0.14 There has been a significant reduction in office space in the borough, and whilst there is no evidential need for further office space, any further release of office space must be managed to ensure sufficient floorspace is retained. This policy seeks to ensure that whilst there is flexibility and adaptability of floorspace to allow for vitality and vibrancy of town centres, ensuring a mix of uses is also critical, including the provision of office space. To achieve this, policy will provide a sequential approach to office space release. This will ensure that existing office space located within appropriate locations is retained, unless it can be demonstrated as being surplus to requirement and therefore able to be released.
- 5.0.15 To ensure that new town centre uses are delivered within the right locations, a sequential test will be required for schemes that propose such uses outside of town centres. An Out of Centre Impact Assessment will also be required to support proposals, to ensure that they would not be harmful to the vitality and vibrancy of centres. Paragraph 90 of The National Planning Policy Framework (2023) sets out that out of centre retail (and leisure) should be supported by an Impact Assessment for any schemes of 2,500sqm, where there is no locally set threshold. The Harrow ENS (2023) recommends a threshold of 400sqm for all out of centre retail and leisure uses. The reason for the lower threshold is that the NPPF minimum threshold of 2,500sqm gross may be an inappropriate threshold for LB Harrow because this scale of development would exceed the overall long-term retail/food beverage projections for all zones in the Borough. The lower retail capacity projections and uncertainties about the cost-of-living crisis suggest town centres are now more vulnerable to out-of-centre developments.

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<sup>30</sup> NPPF (2023) Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

- 5.0.16 Strengthening Harrow town centre and maintaining or enhancing the viability and vitality of the borough's hierarchy of town centres and neighbourhood parades is a key priority of the Council's draft Long Term Transport Strategy as it promotes sustainable transport options.

#### *Industrial Land*

- 5.0.17 The West London Economic Land Review (2019), and the 2021 update provided West London and Harrow specific evidence for industrial land. The London Borough of Harrow is identified as having the smallest quantum of industrial land in West London and has proportionally lost the most industrial land over the last previous plan period. Between 2000/01 and 2019/20 Harrow has seen a 143,000 sqm decline in industrial floorspace. The emergence of new industrial floorspace demands (such as data centres and distribution hubs to support online retailing) and the greater than anticipated loss of industrial floorspace means that Harrow must retain industrial land; many other parts of London are in a similar position.
- 5.0.18 Harrow's logistical infrastructure including the highway and rail network is not strategically well linked to inner London, Heathrow or areas outside London. For this reason, it is not an attractive location for large floorplate industrial or logistics operators. Traditionally, industrial floorspace in Harrow has been for small to medium size enterprise, a trend that is likely to continue given the above constraints in relation to access, land holdings and age of stock. Industrial vacancy rates within Harrow have remained low, at around 1.7%, and have done so since 2018. This vacancy rate is much lower than both the England and London average indicating an undersupply of industrial floorspace in the borough.
- 5.0.19 Going forward, Harrow should seek to protect its existing industrial spaces and seek renewal and the provision of new quality premises where possible.
- 5.0.20 Uses that are still industrial and fall within Use Class E(g)(ii) and (iii) (research and development, and industrial processes respectively) are capable of being located in close proximity to more sensitive uses, such as residential or town centres, and will be directed towards town centres rather than SIL / LSIS areas. Such uses can reasonably be expected to be located outside of designated industrial areas, where nuisance causing activities are able to lawfully be undertaken, and which are more difficult to locate elsewhere within the borough.
- 5.0.21 Policy E4 (Land for industry, logistic and services to support London's economic function) of the London Plan (2021) provides a list of appropriate industrial uses that provision should be made for in terms of operational requirements. These should be provided and maintained taking into account strategic and local employment land reviews and industrial land audits. Based on the up-to-date evidence, to meet the evidenced need for industrial land and premises, Harrow is not in a position to release any land from its industrial stock.

- 5.0.22 The up-to-date evidence base sets out that Harrow has a very modest stock of industrial premises comprising modest sized buildings and land holdings in comparatively small industrial estates. Whilst there are very low vacancy rates, premises are generally poor in quality and with low rent levels. Furthermore, given these challenges and poor strategic highway and rail network links, delivering a meaningful increase of floorspace and premises remains difficult. By reason of this, the Council will seek to ensure that the designated industrial land across the borough (SIL & LSIS) are protected, and their use is primarily for Use Class B2 and B8, and for Sui Generis uses that can be satisfactorily demonstrated as being suitable for these locations.
- 5.0.23 Whilst Policy E4 (Land for industry, logistic and services to support London's economic function) of the London Plan (2021) sets out that (former) B1c (light industry) use is appropriate within industrial sites, this use is also suitable in principle to be located within more sensitive locations, such as town centres and / or residential areas. With Use Class E(g) (ii) & (iii) being directed outside of SIL and LSIS, this allows more availability of land and premises for the heavier industries that fall within use class B2 and B8 or what can be demonstrated as similar in terms of requirements and impacts.
- 5.0.24 The Use Class Order sets out that uses that fall within E(g) (ii) & (iii) are able to be carried out in a residential area without detriment to its amenity; such uses can therefore reasonably conclude to be appropriate within town centre locations. Therefore given the specific constraints in relation to industrial floorspace provision in the Borough, use class E(g) (ii) & (iii) are encouraged to such locations rather than designated industrial sites. In exceptional circumstances Use Class E(g) (ii) & (iii) may be appropriate within designated industrial sites, however will need to demonstrate acceptability within the SIL / LSIS and how a use would contribute to the SIL / LSIS and not remove viable Use Class B2 or B8 from the Borough's stock within a protected industrial site.
- 5.0.25 Where planning permission is required for employment uses, the use of planning conditions where appropriate and having regard to the relevant requirements, will be used to ensure that employment floorspace is retained and not lost through potential permitted development.
- 5.0.26 New development should support local employment, skills development, apprenticeships and other training initiatives. The Council's Economic Development team provides a programme to support developers to provide opportunities for residents to gain construction employment on major developments. Utilising local suppliers where possible ensure that local business is able to take advantage of the economic benefits of new development, and also ensure that delivery of goods and services are minimised from a transportation perspective. Where appropriate, planning obligations (through S.106 agreements) will be used to secure appropriate contributions.

## Strategic Policy 05: Harrow & Wealdstone Opportunity Area

### Linkages:

*NPPF Chapter 6: Building a strong, competitive economy*

*NPPF Chapter 7: Ensuring the vitality of town centres*

*London Plan Chapter 1: Planning London's Future – Good Growth*

*London Plan Chapter 2: Spatial Development Patterns*

*London Plan Chapter 6: Economy*

### **Strategic Policy 05: Harrow & Wealdstone Opportunity Area**

The Harrow & Wealdstone Opportunity Area comprises three distinct areas: Harrow Metropolitan Town Centre and surrounding area, Station Road, and Wealdstone District Town Centre and surrounding area). Each of these areas have a distinct character and serve different functions. The Council will support new development that responds to the specific characteristics and intended function of each of the areas.

- A. The Council will direct and support development within the Harrow & Wealdstone Opportunity Area, where it assists in the growth and regeneration of the Area, and delivers against the growth potential identified in the London Plan (2021) through:
- a. Supporting the delivery of a minimum of 5000 well-designed homes that achieve the homes needed across the Opportunity Area;
  - b. Supporting the delivery of a minimum of 1000 jobs into the Opportunity Area, supporting employment floorspace to meet the evidenced needs of the borough and wider West London sub-region;
  - c. Supporting the intensification and modernisation of existing employment and industrial floorspace, consistent with policy LE3 Industrial Land;
  - d. Ensuring new development conserves and enhances the significance of heritage assets;
  - e. Working with strategic partners to deliver more sustainable transport modes to serve the Opportunity Area, wider borough and sub-region;
  - f. Working with strategic partners and funding bodies to assist in the delivery of essential infrastructure to support new development across the Opportunity Area.
- B. The Council will seek to support comprehensive development where it meets the policies of the wider development plan, and where relevant, masterplans that have been prepared for each of the sub-areas.
- C. The Council will ensure that development within areas of the Opportunity Area that are not capable of facilitating significant change (such as those outside town centres and allocated sites) remain appropriate to their locations.

### **Harrow Metropolitan Town Centre**

- D. Harrow Town Centre is classified as a Metropolitan Town Centre. The Council will support proposals that strengthen this classification, and where they:
- a. Reinforce the St Ann's Road, Station Road and the St George's and St Ann's primary shopping areas as the focal point for new appropriate town centre development;
  - b. Reinforce the centre as a primary location for office, retail, evening and night-time economy, and leisure use within the borough and prioritise experiential uses to increase footfall and dwell time;
  - c. Provide flexible floorspace / premises that allows for multiple uses that can contribute to both daytime and night-time economies;
  - d. Include mixed use schemes incorporating appropriate ground floor commercial uses with active frontages;
  - e. Improve the pedestrian walking connectivity and walking environment throughout the Metropolitan Centre;
  - f. Car parking is provided in line with London Plan standards, including Electric Vehicle charging points; and
  - g. Support improvements to sustainable transport connections to the wider borough;
  - f. Ensuring new development conserves and enhances the significance of heritage assets including the Harrow on the Hill Conservation Area.
- E. Proposals that fail to comply with the above will be resisted.
- F. New development must address the principles and objectives within the Harrow Town Centre Masterplan.

### **Station Road**

- G. Development along Station Road linking Wealdstone District Centre and Harrow Metropolitan Town Centre must make a positive contribution to its environment and identity. Proposals should:
- a. Be of a massing, bulk, scale and a high-quality design that optimises land, consistent with the sub-areas inclusion within the broader Opportunity Area (being a designated area suitable for substantial change), whilst ensuring a satisfactory relationship with the surrounding suburban character area which is a much lower density;
  - b. Provide active, viable and serviceable non-residential ground floor frontages; and
  - c. Contribute to planned improvements to the public realm and road junctions, including the creation of a green boulevard, which improves the environment and active transport linkages between the two centres.

**Wealdstone District Town Centre**

- H. Development with the Wealdstone Town Centre will be required to strengthen the vibrancy and vitality of the district centre and improve the environment and identity of Wealdstone as a location for business, industrial activity and family living. Proposals will be supported where they:
- a. Are of a massing, bulk, scale and a high-quality design that optimises land within an area designated suitable for substantial change, whilst ensuring a satisfactory relationship with the surrounding low density suburban character;
  - b. Contribute to planned improvements to the public realm. Specifically, this includes improvements to the Harrow & Wealdstone Rail & Underground Station and surrounds to overcome perceptions of crime and poor safety, and to respond to the climate change emergency (including flooding) and for safe and efficient pedestrian and cycle use;
  - c. Improve sustainable movement connections from Wealdstone Town Centre to the planned regeneration developments and large scale allocated sites within the vicinity of the town centre;
  - d. Provide a design that respects, and reinforces the centre's heritage and character in relation to architecture, streetscape, road layout and its relationship with the wider suburban character area; and
  - e. Modernise and intensify Wealdstone Industrial Land and Premises across all levels of the industrial land hierarchy (see Policy LE3 Industrial Land);

**Supporting Text**

- 5.0.27 Opportunity Areas are identified under the London Plan as significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. The Harrow and Wealdstone Opportunity Area offers significant opportunity for urban renewal and intensification, providing the impetus to regenerate Wealdstone and strengthen Harrow town centre. Capacity exists to deliver substantial employment growth through an uplift in retail, office and hotel development within the town centres and the intensification of industrial and other business uses within the Wealdstone Area. Under the previous Local Plan, a significant amount of Strategic Industrial Land was released with the closure of the Kodak site. There is scope to accommodate a substantial portion of the Borough's future housing need through the delivery of higher density residential and mixed-use development on key strategic sites where development is matched by investment in infrastructure and achieves a high standard of design.
- 5.0.28 The London Plan (2021) requires the Harrow & Wealdstone Opportunity Area to secure a minimum of 5000 homes and 1000 jobs over the plan period. Strategically, the Council will seek to deliver a minimum of 7,500 homes on permitted and allocated sites due to the highly sustainable location and the capacity to accept a higher density of development (see Strategic Policy SP03). The Opportunity Area has a significant proportion of town centre

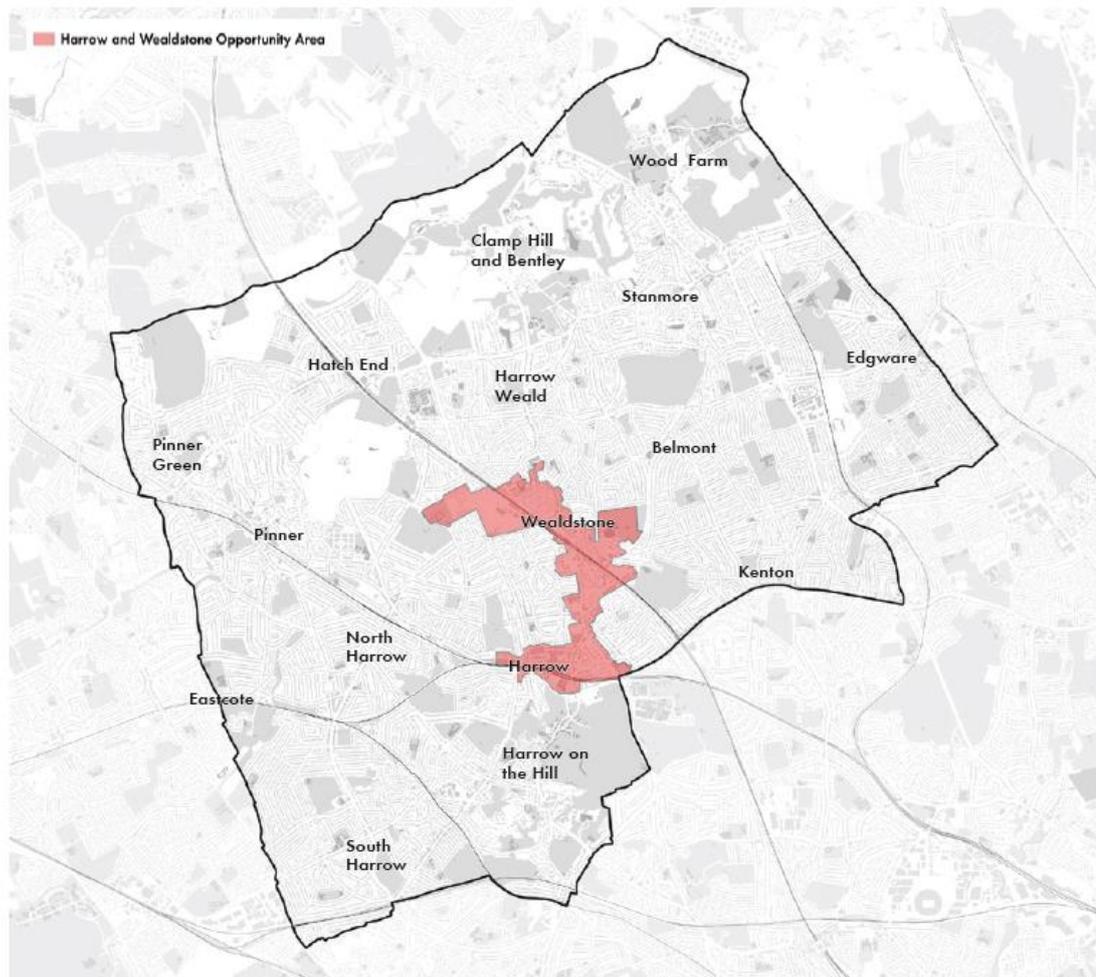
employment floorspace, which will be retained, and where possible new floorspace will be delivered. Retaining or re-providing the existing uses within all industrial sites, especially where heavy industry (B2 / B8 or similar Sui Generis Use) is currently occupying the site is encouraged. This approach will seek to optimise the employment space available within the Opportunity Area and assist in the delivery of a minimum of 1000 jobs within the Opportunity Area. The Council will seek to deliver the minimum homes and jobs required by the London Plan (2021) and will work with strategic partners in conjunction with the use of the Community Infrastructure Levy to ensure that there are sufficient infrastructure improvements to support the anticipated new development.

- 5.0.29 The Council will look to deliver Masterplans for town centres and key areas across Harrow where appropriate, and where this applies to the Opportunity Area, new development will be expected to come forward.

#### *Opportunity Area*

- 5.0.30 The Harrow & Wealdstone Opportunity Area is an irregular shape and comprises three distinct areas, the Harrow Metropolitan Town Centre and surrounding area, the Wealdstone District Centre and surrounding area, and the Station Road area which links the two town centres. Immediately abutting the Opportunity Area is suburban Harrow which has a strong two storey residential character. This change in character is very distinct, and care must be taken to ensure that the two-character areas respond appropriately to one another. Across the Opportunity Area there are a variety of different heritage assets with new development potentially capable of affecting their significance.
- 5.0.31 Harrow Metropolitan Town Centre is characterised as the most densely developed area in the borough (with scope for further intensification), and is the primary location for retailing, office, leisure and other (non-industrial) employment uses. The built form of the town centre has the highest concentration of taller buildings within the borough, and combined with its highly sustainable location, will remain the key location for new development.
- 5.0.32 Station Road links Harrow Metropolitan Town Centre with district town centre of Wealdstone and is characterised as a mixed-use corridor between the two centres. This part of the Opportunity Area is a relatively narrow awkward shape characterised by commercial units on the western side of Station Road with some larger sites, whereas the eastern side has some industrial sites and residential units facing onto Station Road.
- 5.0.33 The character of Wealdstone Town Centre and surrounds is much more varied. This includes the district town centre, Strategic Industrial Land, Locally Significant Industrial Sites (estates), large comprehensive regeneration developments and also well-established Metroland character housing. New development within the Wealdstone Town Centre Area must be cognisant of the variations within the character of the area, ensuring that any interface of character areas is respected.

## Harrow and Wealdstone Opportunity Area



5.0.34 Not all locations across the Opportunity Area will be capable of accommodating growth equally. The Harrow & Wealdstone Opportunity Area includes three main character areas. Each of these character areas are further comprised of sub areas, which have their own considerations in terms of facilitating new development. The town centre locations within the Opportunity Area will remain the location for higher density development. Outside of these, site allocations will provide guidance for sites where significant development is sought (sites such as Kodak, former Civic Centre, and Byron Park / Harrow Leisure Centre). New development should reflect the Public Transport Accessibility Level (PTAL) across the Opportunity Area, which will vary across each of the areas. Outside of these identified areas, new development must be delivered in accordance with the wider development policies.

5.0.35 Proposals for Built to Rent developments are likely to be acceptable within the boundaries of the Opportunity Area and the District Town Centres, subject to compliance with other policies of the Development Plan. These locations provide good access to public transport, local services, facilities and pursuing employment opportunities. This will encourage increased sustainable modes of transport, reduce car use and the risk of increased on-street car parking in the surrounding area. Build to rent schemes accommodate a minimum of 50 units (or more) and require the delivery of a significant quantity of units; to

benefit from economies of scale and fund the cost of managing and operating the development. Therefore build to rent schemes on smaller sized sites, particularly outside of the above proposed locations (. i.e. suburban areas) would require development to be built at a high density on 4 or more storeys, in order to ensure viability. This would be contrary to the predominate character of the Borough is two -three storey in suburban locations and three to four storeys with the town centres and near transport hubs, which means locations outside of the Opportunity Area and District Town Centres are not likely to be suitable for Build to Rent Developments. Overall, the proposed policy approach will minimise any potential harmful effects on the character areas of the Borough and ensures viability of potential development proposals.

#### *Harrow Metropolitan Town Centre*

- 5.0.36 Harrow Town Centre is classified as a Metropolitan centre<sup>31</sup> in the London Plan and will remain the focal point for new development to strengthen the classification. Harrow Town Centre has excellent Public Transport Accessibility Levels, providing train services into London out along the Chilterns Railway. Buses serve the centre and provide access across the remainder of the borough and beyond. High quality development that introduces appropriate town centre uses and are sizes that are able to contribute to the economy will be supported. In order to strengthen the metropolitan status of Harrow Town Centre, the Council will support site assembly to bring forward comprehensive development where appropriate.
- 5.0.37 The design and use class of new development must reflect and reinforce the town centre's status in the London context. In addition to the intensity, bulk and scale of development, the design and quality should reinforce the centre's future as a modern, thriving place. Bland and unresponsive design is unlikely to strengthen Harrow town centre's character and appearance, nor contribute to the creation of a distinctive, identifiable place. New floor space must be flexible and adaptive to ensure maximum flexibility within the current economic climate, and any other changes which may present further challenges to the economy.
- 5.0.38 Through new development and planned public realm improvements, the Council will seek to improve wayfinding and to better define legibility and the centre area within Harrow town centre. Specifically, the St Ann's Road, Station Road and the St George's and St Ann's Shopping Centres will remain the primary focal point for shopping areas, and where new appropriate town centre development will be directed to these locations.
- 5.0.39 The council will continue to work with Transport for London to improve access to and from the Metropolitan Town Centre across the borough, specifically seeking to deliver sustainable methods of transport for residents and visitors to utilise. Improving sustainable transport will reduce the amount of vehicle movements improving climate change matters and air quality, and also moving towards a less car dominated centre where walking and cycling are prioritised. The Harrow Town Centre Masterplan will assist in setting out (among other

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<sup>31</sup> London Plan (2021): Annex 1 Town Centre Network; Table A1.1 - Town Centre Network

things) how sustainable transport such as walking and cycling will be considered within the Harrow Town Centre and linking to the wider Harrow & Wealdstone Opportunity and beyond.

#### *Station Road*

- 5.0.40 Station Road lacks a distinctive identity, other than a transportation route linking Harrow Town Centre and Wealdstone Town Centre. However, this link is a poor environment for pedestrians due to heavy vehicular traffic. The Station Road section of the Opportunity Area is relatively narrow, with a mixture of character ranging from two-storey dwellings to higher four storeys in places. Beyond the majority of premises fronting Station Road, the character promptly changes into two-storey suburban character. This relationship between the Opportunity Area and the wider suburban character creates constraints and challenges to realising significant change along much of the Station Road element. Some specific sites with larger land holdings do provide opportunities and will be subject to site allocations as identified within the policy maps. All new proposals will need to demonstrate how a site is able to optimise development whilst ensuring that the interface between a more densely developed location and a strong suburban character of lower height and density.
- 5.0.41 The policy seeks to realise the potential that exists, through redevelopment, to provide an active frontage along both sides of the road, to improve the continuity of building lines, reduce the presence of unsightly and unused forecourts, and to provide a more coherent street scene. A simple, uncomplicated but modern design, exhibiting quality external finishing will achieve a coherence between different developments and existing buildings along the Station Road frontage.
- 5.0.42 The Council and its partners are committed to improving the public realm of Station Road. Funds raised through the Harrow Community Infrastructure Levy, together with any site-specific requirements made available as a result of Planning Obligations, will be used and co-ordinated to deliver safe, accessible and legible surfaces and the creation of a green, tree-lined boulevard which benefit pedestrians, cyclists and bus users. On sites that create new public realm, a consistent finish will assist in a seamless connection with the planned or delivered improvements along the remainder of Station Road, and again aid in providing much needed continuity.

#### *Wealdstone Town Centre*

- 5.0.43 Wealdstone is classified as a district centre<sup>32</sup> within the London Plan (2021), which also notes the centre has having a low commercial growth potential but a high residential growth potential. Wealdstone is primarily served by the Harrow & Wealdstone Train and Underground Station, which provides mainline trains from London Euston northwards out of London, Bakerloo and London overground between London Euston and Watford Junction.

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<sup>32</sup> London Plan (2021): Annex 1 Town Centre Network; Table A1.1 - Town Centre Network

- 5.0.44 Over the last plan period, significant investment has occurred in the Wealdstone Town Centre. Specifically, new residentially led developments and public realm improvements have been implemented within the area. Wealdstone provides employment space, through both Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) industrial sites.
- 5.0.45 New developments have delivered a significant number of homes into the Opportunity Area, with further development potential on several large sites. These developments have and will continue to assist in meeting the housing targets set for the borough. Development within the Wealdstone Town Centre provides for higher density developments that result in more noticeable change within the area. Nearer the edges of this part of the Opportunity Area, and further away from the more densely developed town centre, existing developments such as Kodak and earmarked development at Byron Corner, are adjacent to the strong suburban character of Metroland Harrow. Developments in these locations needs to ensure that design responds to the character of the area, and specifically where new development is sought to be brought forward where two distinct character areas adjoin, care needs to be taken to ensure both character areas are respected.
- 5.0.46 Within the Wealdstone area, both LSIS and non-designated industrial land provide valuable contributions to the remaining industrial stock of the borough, and the retention of these sites, or modernisation where appropriate, will assist in delivering employment opportunities within the locality and borough. Any release of industrial land regardless of protection under the development plan, will be considered against the most up-to-date evidence.
- 5.0.47 Wealdstone has perceived crime and security issues worsened by the poor-quality public realm. Whilst improvements within Wealdstone Town Centre have been made to the public realm through Transport for London funded projects, further improvements will be supported where they assist in achieving the wider policies of the development plan. With new development the opportunity to improve the public realm presents itself, along with planned infrastructure improvements.

### **Harrow Town Centre**



## Policy LE1: Development Principles & Town Centre Hierarchy

### Linkages:

*NPPF Chapter 6: Building a strong, competitive economy*

*NPPF Chapter 7: Ensuring the vitality of town centres*

*London Plan Chapter 1: Planning London's Future – Good Growth*

*London Plan Chapter 2: Spatial Development Patterns*

*London Plan Chapter 6: Economy*

### **Policy LE1: Development Principles & Town Centre Hierarchy**

The council will support developments that ensure an appropriate mix of main town centres uses, or that demonstrably contribute to the vitality and vibrancy of the centre or parade.

- A. The Council will support town centre developments that:
  - a. Demonstrably contribute to the vitality and vibrancy of the town centre or parade;
  - b. Are of a scale and intensity commensurate to the size and role of the centre or parade it is located within;
  - c. Provide an appropriate mix of uses within a shopping area or parade, ensuring an over proliferation of Sui Generis uses does not occur;
  - d. The ground floor would have an accessible and active frontage; and
  - e. Community facilities in town centres are able to be supported by the Council where compliant with Policy C11.
- B. The Council will support mixed-use developments in town centres and parades where:
  - a. The ground floor element complies with A;
  - b. There is a clear and satisfactory delineation of access and servicing arrangements (bin store, cycle storage) between the two uses; and
  - c. There is satisfactory mitigation in accordance with the Agent of Change (Policy D13 of the London Plan (2021)).
- C. Residential uses on the ground floor in any town centres or neighbourhood parades will not be supported.
- D. The loss of appropriate town centre uses, community facilities and infrastructure from town centres will not be supported unless compliance with policy C11 is demonstrated.
- E. Temporary events such as markets and entertainment uses will be supported where:
  - a. They are supported with a management plan agreed by the Council; and
  - b. They do not impact on residential amenity or highway safety.

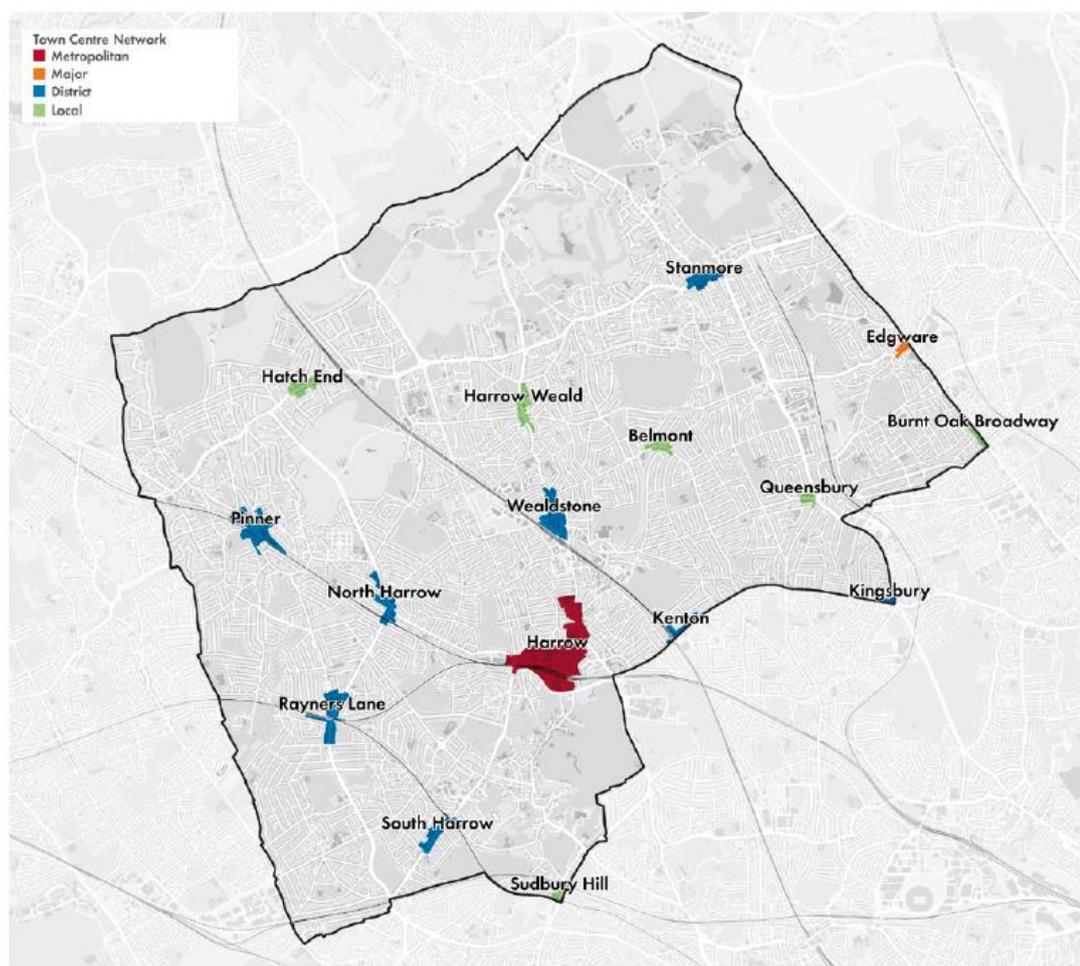
- F. The Council will resist the loss of any employment, leisure (excluding Sports and Recreation) or cultural uses within a neighbourhood parade that provides essential day to day amenities. The loss of such uses will only be accepted where 24 months of satisfactory marketing has been undertaken.
- G. Proposals for new retail and leisure development in out of centre locations will be resisted. Any such out of centre developments must:
- Undertake a sequential test to demonstrate that there are no appropriate town centre sites, followed by edge of centre sites;
  - Be supported by an Impact Assessment for proposals where the floorspace exceeds 400 square meters to demonstrate no harm to centres within their catchment; and
  - Be supported by a Green Travel Plan to enhance sustainable access between the site and the town centre network.
  - for a leisure use demonstrate that it is located within an identified area of deficiency or an identified area for future need
- H. The release of office floorspace will be supported where the sequential approach below has been applied in the following order:
- Vacant floorspace outside of designated town centres;
  - Vacant floorspace within designated Major, District or Local Town Centres;
  - Poor quality floorspace within designated Major, District or Local Town Centres; and
  - Floorspace within the Harrow Metropolitan Town Centre.
- H.1 Where the building has been vacant for more than 12 months and there is genuine evidence that all opportunities to re-let the accommodation have been fully explored, including evidence of suitable marketing over a 12-month period for office use or other appropriate employment or community uses.

## Supporting Text

- 5.1.1 Outside of the Harrow & Wealdstone Opportunity Area, the Borough's network of town centres comprises: part of one major centre, eight district centres and five local centres (Appendix 4). Town centres form a central part of the London Plan's spatial strategy for outer London and are at the heart of Harrow's spatial strategy for areas of the Borough beyond the Harrow & Wealdstone Opportunity Area. They give Harrow's districts their sense of individual identity and provide the basis for sustainable urban living, being inextricably connected with the public transport network. As the demographics and retail behaviour of residents has evolved, the character of the Borough's centres has changed and many now have a complimentary rather than principal role in meeting residents' shopping needs. Nevertheless, they still have a role; it therefore remains important to sustain and where possible enhance the vitality and viability of the Borough's town centres.
- 5.1.2 Harrow's network of town centres and their classifications are well established. Local parades of shops supplement the capacity of town centres by providing small walk-to convenience shops and facilities that serve the neighbourhood

in which they are situated. A total of 34 Neighbourhood Parades have been identified within Harrow and are an important part of the Borough's suburban fabric playing an important role in the day to day living of residents, particularly within the suburban areas of Harrow. These are set in Appendix 4.

### Town Centre Hierarchy



5.1.3 The Harrow Economic Needs Study (2023) (ENS (2023)) provides an updated appraisal of town centre economic uses initially set out in the Economic development Needs Assessment (2017), setting out the significant changes that have occurred over this timeframe and the impact that this has had on town centres generally across London, and in Harrow. It has undertaken a quantitative and qualitative assessment of the need for new retail, leisure and other main town centre uses within LB Harrow.

5.1.4 Across the Local Plan period (to 2041), the floorspace projections are as follows;

- 1) Combined retail, food /beverage, leisure and entertainment: 13,900sqm
  - a) Retail (Convenience & Comparison): 800sqm
  - b) Food and Beverage; 13,100sqm

- 5.1.5 The ENS (2023) did not provide an office floorspace requirement for the borough. However, it did set a trend-based projection, noting that whilst there is still sufficient office floorspace capacity across the borough, there has been significant loss of office floorspace. Given there has been notable losses of floorspace across the borough (predominantly through the Prior Approval Process converting to residential), the Council will continue to closely monitor and review land supply and demand for all employment floorspace and premises.
- 5.1.6 This policy sets out how the above floorspace requirements for the Borough across the plan period (to 2041) will be achieved, and how the Council will ensure that the vitality and vibrancy of each of the centres and parades.
- 5.1.7 Town Centres have come under intense pressure to remain relevant and viable. Online shopping, the cost-of-living crisis and Coronavirus have all placed immense pressure on town centre occupiers to remain viable, with many operators shutting down. Managing the use of premises within a town centre has become more challenging with the amendment to the Town and Country Planning (Use Class) order 1987 in September 2020. The amendment introduced the E Use Class which allowed for greater movement between different uses within this class than previously.
- 5.1.8 The Council will continue to monitor the use of premises within the designated town centres and parades. Specifically, the Council will have particular regard to Sui Generis uses. Whilst Sui Generis uses can provide choice and contribute to the vitality and viability of a town centre, some uses can have a negative impact, in particular to the health and wellbeing of visitors (such as betting shops, casinos, pawn shops, shisha bars and some food outlets). The Council explore and seek to implement where considered appropriate the use of Article 4 Directions to ensure the vibrancy and vitality of town centres and parades along with achieving appropriate broader health and wellbeing outcomes.
- 5.1.9 Whilst retail will remain a key use class within a town centre, there has been a clear shift in how town centres are used and how they are experienced. This policy seeks to ensure that new development is located within the right locations and is flexible and adaptive to ensure resilience for town centre uses to adapt to changing economic conditions. All new development must demonstrate how it will positively contribute to the vitality and vibrancy of the centre.
- 5.1.10 The aim of this policy is to provide clear support for retail, leisure and cultural development or extensions within appropriate town centres. For those centres with multiple functions, the primary shopping area has been defined on the Policies Map and should be the focus for retail development. Sites within the primary shopping areas, as defined on the Policies Map, or those within 300 metres of the primary shopping area, or those falling anywhere within the boundary of other town centres, represent the sequentially preferable locations for retail, leisure and cultural development or extensions. Where the use and scale of the development is appropriate to the town centre, applications on the sequentially preferable sites need not provide information

on site search and selection. Proposals that may impact Leisure (Sports and Recreation) should be delivered in accordance with Chapter 6.

- 5.1.11 Temporary events and markets provide a point of difference to the experiential offer of a centre or parade and can provide a reason for people to visit a centre or parade positively benefiting the vitality and vibrancy of the wider locality. Temporary events are able to make use of vacant premises, which may be through existing built stock or as part of a new build scheme. Major schemes should set out in an agreed vacancy strategy how space is able to be used for temporary events or meanwhile uses.
- 5.1.12 Traditionally market events occur outdoors, and the Council will work with market Operators and town centre managers to assist in bringing these forwards in the appropriate locations. Operators will need to ensure that management plans for temporary market uses have been agreed with the Council prior to such events being held. Management plans must demonstrate that events will not be harmful to residential amenity or the highway network. Locating temporary markets in highly sustainable locations is encouraged to ensure ease of transport to and from the event in a sustainable manner.
- 5.1.13 Neighbourhood parades are located outside of the designated town centres and provide a valuable resource for much of suburban Harrow. Neighbourhood parades have the ability to provide day-to-day amenities contributing to sustainable neighbourhoods and assisting in the modal shift to more sustainable transport modes. The loss of these assets across the borough results in residents needing to travel further to collect day to day convenience goods, which can lead to further use of the private motor vehicle, especially from parts of the borough less connected to public transport. The loss of employment, cultural or leisure uses from such a location will only be supported where there has been 24 months of appropriate marketing, and alternative non-residential uses have been explored. Marketing should reflect the type, use and size of floorspace, seeking replacement operators and then other uses appropriate for town centres or neighbourhood parades.
- 5.1.14 Residential use is a more permanent use within a site, with the ability to return a premise to a non-residential use is highly unlikely to occur. Residential uses at ground floor within neighbourhood parades will not be supported, as this sends the clearest signal that the parade is in decline and all attempts to revive it have been abandoned.
- 5.1.15 New out of centre retail, leisure and cultural development or extensions to existing out of centre developments pose the greatest potential threat to the viability and vitality of town centres. These proposals can compete with town centres, particularly where they involve comparable goods retailing, and often reinforce car dependent behaviour. Attention will also be paid to the format and scale of the proposed development to consider whether sufficient flexibility has been exercised in the assessment of how other sequentially more preferable sites could meet any identified need.

- 5.1.16 Proposals should undertake a comprehensive sequential test of the borough to identify a preferable site, which should include reviewing town centre locations followed by edge of centre locations. Where developments are near an administrative boundary with a neighbouring borough, sites within that borough in sequentially preferable locations may be required as well.
- 5.1.17 Where a sequential test has been agreed with the Local Planning Authority and an out of centre site has been demonstrated as the only sequentially preferable site, any sites that exceed 400sqm (gross floorspace) require an Impact Assessment. Any such assessment shall be carried out in accordance with the National Planning Policy Framework (2023) (or any superseding framework). This should include assessment of:
- (a) The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
  - (b) The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).
- 5.1.18 The office stock across Harrow has been in steady decline over the previous plan period, much of which has been lost to residential use through the prior approval process. This has resulted in much of the older stock being released. The Harrow ENS (2023) has identified an oversupply of office space, notwithstanding the release over the previous plan period. The Council will continue to monitor and manage the release of office floorspace to ensure that a sufficient supply remains in the event that further office space is likely to be released beyond what has been forecasted.
- 5.1.19 In managing the release of office floorspace from the Borough's stock, Policy LE 1 (Development Principles & Town Centre Hierarchy) sets out a sequential approach, with office floorspace located outside of designated town centres more sequentially preferable to be released than floorspace released which is located within town centres, specifically the Harrow Metropolitan Town Centre. Development proposals should firstly seek to release office floorspace that is vacant and has been for at least 12 months. Applications must be supported with appropriate marketing to demonstrate that all reasonable efforts have been to let the space. Applications are expected to consider other employment or community uses before release to residential is pursued.
- 5.1.20 Marketing undertaken as required by this policy must be robust and proportionate and cover a period of no less than 12 months, that accurately reflects market rates suitable for the type use and size of the particular floorspace. In most instances marketing will be tested independently by a suitably qualified professional.

## Policy LE2: Night-time and Evening Economy

*Linkages:*

*NPPF Chapter 6: Building a strong, competitive economy*

*NPPF Chapter 7: Ensuring the vitality of town centres*

*London Plan Chapter 1: Planning London's Future – Good Growth*

*London Plan Chapter 2: Spatial Development Patterns*

*London Plan Chapter 6: Economy*

### **Policy LE2: Night-time and Evening Economy**

- A Within the Harrow Metropolitan Town Centre, proposals which enhance the evening and night-time economy will be supported where:
- a. They make a positive contribution to the vitality and vibrancy of the centre;
  - b. They satisfactorily mitigate any negative parking or traffic implications;
  - c. They appropriately address the agent of change principle as set out in Policy D13 of The London Plan (2021);
  - d. They demonstrate that the evening or night-time use will provide an active frontage during daytime hours; and
  - e. They satisfy the principles set out within the Harrow Metropolitan Town Centre Masterplan.
- B. Proposals which enhance the evening economy of town centres outside of the Metropolitan Town Centre will be supported with regard to:
- a. The role and function of the centre;
  - b. Their positive contribution to the vitality and vibrancy of the centre;
  - c. The satisfactory mitigation of any negative parking or traffic implications; and
  - d. The agent of change principle as set out in Policy D13 of The London Plan (2021).
- B.1 Proposals should demonstrate evening or night-time uses will remain active during daytime hours where possible.
- C. Proposals for the redevelopment of night-time or evening economy use to provide a mixed-use scheme will be supported where:
- a. There is a sufficient re-provision of the existing floorspace;
  - b. Adequate separation of access and servicing between the different uses is achieved;
  - c. The agent of change principle as set out in Policy D13 of The London Plan (2021) has been addressed; and
  - d. Wider policies within the development plan are complied with.
- D. All new proposed night-time activities must seek to ensure all residents are able to participate in nighttime activities, ensuring a safe environment and in particular for women and girls, along with the LGBTQ+ community.

- E. Proposals that would compromise any component of this policy, or would be detrimental to the vitality and viability of town centres, will be refused.
- E. The loss of facilities that contribute to the evening and night-time economy will be resisted unless;
  - a. Appropriate marketing of no less than 24 months to demonstrate they are surplus to requirement; or
  - b. There are suitable facilities within the centre that adequately provide for this use.

## Supporting Text

- 5.2.1 The night-time economy is an important element of the overall economy of an area, and specifically relates to activity between the hours of 6pm and 6am. Specifically, this also includes uses that are associated within the evening hours. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport and medical services, which employ a large number of night-time workers.
- 5.2.2 Generally speaking, Harrow does not have a well-developed night-time economy. The primary reason for this is the proximity into central London which provides a greater selection of options for eating, drinking, leisure and cultural activities. However, with a growing population in the Harrow Metropolitan Centre and as the cost of returning to Harrow late in the night can be time consuming and expensive, there is an opportunity to increase the offer for residents and visitors. Within Harrow, the Metropolitan Centre provides the optimal location for opening hours that are more unsociable and associated with late night uses such as clubs and restaurants. Harrow Metropolitan Town Centre has a London Plan (2021) night-time economy classification of NT2, which places it as an area of regional or sub-regional significance.
- 5.2.3 Whilst sustainable modes of transport, including walking and cycling are encouraged, nevertheless some nighttime activities may still rely on vehicles such as the private car and taxi / uber movements. Night-time activities should set out how servicing such as taxi / uber drop offs and pickups are able to be undertaken without harm to neighbouring properties or highway safety.
- 5.2.4 Nighttime activities by their very nature of operating in hours of darkness, can lead to opportunities for anti-social behaviour. Whilst anyone can be a victim of anti-social behaviour, across London (and Nationally) women and girls are disproportionately affected within society. Whilst planning alone cannot resolve this issue, it does play an important role. All development must seek to ensure that schemes are designed to make safer places for all people to visit and be present within, but with particular emphasis on the safety of

women and girls. The Council will look to implement relevant strategies<sup>33</sup> (noting that these may be updated over the local plan period) and will work closely with the Metropolitan Police when throughout the planning process. Applicants should also ensure proposals are in accordance with Policy GR3 (Inclusive Design).

- 5.2.5 The Council intends to produce a masterplan for the Metropolitan Town Centre, setting out where land uses, including night-time and evening economy, would be best directed to across the town centre.

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<sup>33</sup> Mayor of London's Violence Against Women and Girls Strategy (<https://www.london.gov.uk/publications/tackling-violence-against-women-and-girls>), Women's Night Safety Charter (<https://www.london.gov.uk/programmes-strategies/arts-and-culture/24-hour-london/womens-night-safety-charter>)  
LB Harrow Serious Violence Strategy (2024-2027) ([https://www.harrow.gov.uk/downloads/file/32052/Harrow\\_s\\_Serious\\_Violence\\_Strategy\\_2024\\_\\_\\_2027\\_Final.pdf](https://www.harrow.gov.uk/downloads/file/32052/Harrow_s_Serious_Violence_Strategy_2024___2027_Final.pdf))

## Policy LE3: Industrial Land

*Linkages:*

*NPPF Chapter 6: Building a strong, competitive economy*

*NPPF Chapter 7: Ensuring the vitality of town centres*

*London Plan Chapter 1: Planning London's Future – Good Growth*

*London Plan Chapter 2: Spatial Development Patterns*

*London Plan Chapter 6: Economy*

### **Policy LE3: Industrial Land**

The Council will support new development of industrial floorspace within appropriate locations, where they accord with other relevant policies within the development plan.

#### **A. Strategic Industrial Locations (SIL)**

- a. Proposals to intensify, increase or modernise floorspace and premises within SIL will be supported where the uses fall within the industrial-type activities below:
  - 1) General Industry (B2) and similar Sui Generis uses
  - 2) Storage and logistics/distribution (Use Class B8)
  - 3) Secondary materials, waste management and aggregates
  - 4) Utilities infrastructure (such as energy and water)
  - 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
  - 6) Wholesale markets
  - 7) Emerging industrial-related sectors
  - 8) Flexible (B2/B8) hybrid space to accommodate services
  - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
- b. New & emerging industrial uses must demonstrate need and operational compatibility with the wider SIL.
- c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
- d. Any net loss of industrial floorspace and premises within a SIL will not be supported.
- e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within SIL, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.

A.1 Co-location of residential within a SIL will not be supported.

**B. Locally Significant Industrial Sites (LSIS)**

- a. Proposals to intensify, increase or modernise floorspace and premises within LSIS will be supported where the uses fall within the industrial-type activities below;
    - 1) General Industry (B2) and similar Sui Generis uses
    - 2) Storage and logistics/distribution (Use Class B8)
    - 3) Secondary materials, waste management and aggregates
    - 4) Utilities infrastructure (such as energy and water)
    - 5) Land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
    - 6) Wholesale markets
    - 7) Emerging industrial-related sectors
    - 8) Flexible (B2/B8) hybrid space to accommodate services
    - 9) Low-cost industrial and related space for micro, small and medium-sized enterprises
  - b. New & emerging industrial uses must demonstrate need and operational compatibility with the LSIS.
  - c. Subdivision of existing industrial floorspace will be supported where it supports appropriate diversification and meets the needs of a specific end user, and does not compromise the existing operators.
  - d. Any net loss of industrial floorspace and premises within a LSIS will not be supported.
  - e. Proposals that fall within use classes E(g) (ii) & (iii) will be resisted from being located within LSIS, and will only be supported where demonstrated to support an existing Use Class B2 or B8 type use.
- B.1 Co-location of residential within a LSIS will only be supported where these have been progressed through the Local Plan process or have a Masterplan agreed with the Local Planning Authority.

**C. Non-designated Industrial Land**

- a. Proposals to intensify, increase or modernise floorspace or premises within non-designated industrial sites will be supported where the uses fall within the industrial-type activities specified within Policy A.a above, and subject to compliance with other relevant policies within the development plan.
- b. Mixed use schemes will be supported where they comply with the criteria set out within Policy E7C of the London Plan 2021.

**D. Non-industrial uses on industrial land.**

- a. Proposals that seek to introduce non-industrial uses within an industrial site must demonstrate the ancillary nature of the non-industrial use, or satisfactorily demonstrate it is unable to be located elsewhere within the borough with respect to the principle of development.
- b. Non-industrial uses that are not satisfactorily demonstrated as being ancillary to an industrial use or not demonstrated as being able to be located elsewhere within the Borough will not be supported.

## Supporting Text

- 5.3.1 Over recent years the Borough has experienced a trend of continual floorspace losses for industrial land. Numerous small, incremental losses have been supplemented by the loss of some larger sites to residential use including the Kodak Site which was previously designated as Strategic Industrial Land in its entirety but allocated for a comprehensive mixed-use development in the current Local Plan and the Strategic Industrial Land designation consolidated in the process. Such an approach of managed release of industrial land was consistent with the London Plan at the time.
- 5.3.2 The London Plan (2021) brought forward a step change in how industrial land should be considered across all of London, seeking to ensure there would be a sufficient supply of land and premises to meet the current and future demand for industrial and related functions. To determine this, up-to-date evidence to determine what would constitute a sufficient provision at a borough level is required.
- 5.3.3 The London Industrial Land Supply Study (March 2023) sets out a comprehensive review and update of the London industrial land supply. For Harrow, it sets out the following supply of industrial land across the different typologies. The amount of industrial land within Harrow makes up 1% of the industrial land and premises of all of London.

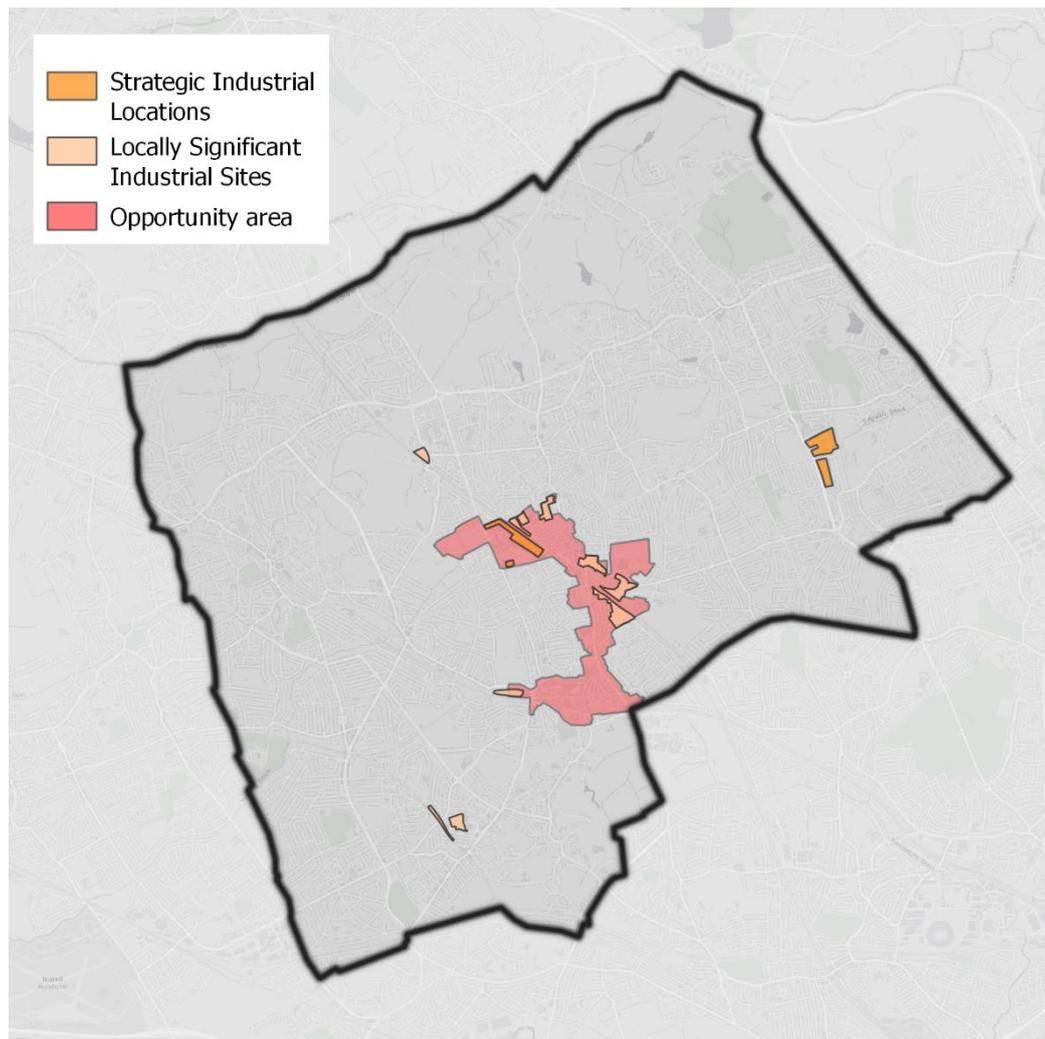
Land Designation	Industrial Land / Premise (ha)	Non-industrial land within designated sites (ha)	Total (ha)
Strategic Industrial Land	13.1	1.3	14.4
Locally Significant Industrial Sites	18.1	4.6	22.7
Non-Designated Industrial Land	16.7	N/A	16.7
<b>Total</b>	<b>48.4</b>	<b>5.9</b>	<b>54.3</b>

Source: Table 2.7: London Industrial Land Supply Study (March 2023)

- 5.3.4 The West London Employment Land Review (2021/22 Update) sets out that the land requirements across the plan period equal an additional 0.6 hectares. This policy seeks to ensure that existing industrial floorspace and premises would be retained, and to seek renewal and provision of new quality premises where possible. Given the modest amount of floorspace that is required to be delivered, the Council will seek to deliver this within the existing industrial sites located across the borough. As at November 2021 the vacancy rate was 1.7% and this is below the Mayor of London's Land for Industry and Transportation Supplementary Planning Guidance (SPG) (2012), which sets out a reasonable average rate of frictional vacancy of 5%. By reason of this, there is limited justification for the release of industrial land in the borough.

- 5.3.5 Strategic Industrial Lands are a London Plan designation and are the main reservoir of land for industrial, logistics and related uses across London, and are given strategic protection because they are critical to the effective functioning of London’s economy. There are two Strategic Industrial Locations in the Borough: the Wealdstone preferred industrial location (Part of the former Kodak site) and the Honeypot Lane industrial business park; the extent of these designations is shown on the Proposals Map. Harrow’s SIL land forms part of the Park Royal / Heathrow sub-regional industrial property market area.

### Industrial Locations in Harrow



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- 5.3.6 SIL estates are able to accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development. It is for this reason that the Council will only support uses in SIL estates that require such space to operate successfully, while encouraging uses that are able to co-locate more easily in areas of the borough without harming the amenity of neighbouring occupiers to do so.

- 5.3.7 The increase in industrial floorspace requirements across the local plan period to 2041 is relatively minimal, being 3,890 sqm (0.39 ha) of additional floorspace, which at a plot ratio of 0.65 (consistent with the London Plan) equates to 0.6 ha of land. In floorspace terms, this represents an increase of just over 1.5% of current provision. Policy LE 03 (Industrial Land) seeks to actively promote the intensification and modernisation of floorspace within SIL locations, and will direct industry that by reason of its very nature, would not be appropriate in more sensitive locations. Whilst Policy E4 (Land for industry, logistics and services to support London's economic function) of the London Plan (2021) set out conforming uses for industrial land, proposals for new development will only be supported where they are within use class B2 or B8, or where a Sui Generis use can be satisfactorily demonstrated as being of similar impacts to B2 or B8. Use Class E(g)(ii) and (iii) (Formerly B1 b/c) are listed as being appropriate within industrial land as set out in Policy E4 (Land for industry, logistics and services to support London's economic function). Maximising the capacity of industrial land through its intensification and in accordance with London Plan Policy E7 will be encouraged, specifically where there is an increase in Use Class B2 and / or B8 through multi-storey schemes or where achieving higher plot ratios.
- 5.3.8 However, by reason of the limited stock of industrial land within Harrow, Policy LE3 (this policy) prioritises uses that are less likely to be able to be provided elsewhere within the borough (outside of designated industrial estates). Industrial uses that would fall within a B2, B8 or a similar scale and intensity Sui Generis use are often unneighbourly through their impacts, and coupled often with long opening hours, require space to be able to operate in such a manner without uncertainty of being restricted by sensitive receiving environments. Use Class E(g)(ii) and (iii) can be carried out in any residential area or town centre (as set out in the Use Class Order 2020) without causing detriment to the amenity of the area, and as such these uses are directed outside of designated industrial estates.
- 5.3.9 New and emerging industrial uses within SIL and LSIS will be supported where the need for the use can be robustly demonstrated and would serve the local economy positively, and in the event of strategic uses, the wider West London context. Furthermore, any such use must demonstrate compatibility with the wider SIL or LSIS to ensure the safe and ongoing success of the wider estate is not compromised.
- 5.3.10 Residential use within SIL is not appropriate as it leads to a reduction in the provision of industrial floorspace and premises for industrial activities and cannot be justified given the low vacancy rates in Harrow and the modest need for additional floorspace and premises.
- 5.3.11 The current evidence base for industrial land across Harrow sets out that the Borough is not in a position to release any further floorspace and premises from the borough stocks. The Local Plan is seeking to meet the borough's future housing need and there is no evidence to justify the release of any industrial land for housing or other uses.

- 5.3.12 In order for London to meet its industrial floorspace and premises requirements, protection must also be afforded to industrial sites that are not designated either as SIL or LSIS. During the London Plan (2021) Examination in Public amendments were made in relation to non-designated industrial land and premises, as it was considered for London to have the sufficient provision of industrial floorspace and premises, non-designated industrial and would need to play a stronger role. Accordingly, further protection was provided for its provision. Specifically for Harrow where there is a limited industrial stock, any opportunity to increase industrial floorspace on such sites will be encouraged and supported. Uses must conform with the appropriate uses set out in Policy E4 (Land for industry, logistics and services to support London's economic function) of the London Plan (2021). Thirty percent of Harrow's industrial stock is comprised of non-designated industrial land, and therefore protection of this is critical to ensuring sufficient floorspace is provided.
- 5.3.13 Co-location of LSIS and non-designated industrial land may be an acceptable form of development, where it maintains industrial floorspace and delivers housing to assist in meeting wider development plan objectives. Proposals for co-location on LSIS must be progressed either through any future local plan review process or via a masterplan approach in the meantime. An ad-hoc or piecemeal planning application within LSIS will not be supported. Any masterplan approach must be progressed in accordance with Policy E7 of the London Plan (2021) and any London Plan Guidance published by the Mayor of London. Proposals on non-designated industrial sites will be on a case-by-case basis with great weight given to what any loss of industrial use and floorspace would be as part of a development. Proposals that would result in the loss of a use from a site that is unable to be demonstrated to be re-provided within the borough, will not be supported. Developments that are unable to re-provide successful industrial or appropriate employment floorspace, that cannot be re-provided elsewhere result in further loss of industrial floorspace and premises that evidentially cannot be released will not be supported. Applications that seek to replace one industrial use for another, where the existing use is not easily capable of being relocated, and replaced with a use that could be located in more sensitive areas, will be resisted. Policy D13 (Agent of Change) of the London Plan (2021) must be addressed to the satisfaction of the Local Planning Authority when considering co-location applications, as the ongoing success and functioning of any wider estate will weigh in the planning balance of any application.

#### *Appropriate Uses*

- 5.3.14 The Council will only support non-conforming uses within industrial premises where they are ancillary to the main industrial use on the site or premises, and that the non-conforming use is clearly connected to the successful operation of an established industrial use. Considerations around the fact and degree of the primary industrial use of site or premises and the non-conforming ancillary element will need to be clearly set out and satisfied.

- 5.3.15 Non-conforming uses within an established industrial site prevent the optimal use of the site, which is to maximise the industrial capacity with uses that are unlikely to be acceptable in other locations. Non-conforming uses will result in less floorspace and premises within such sites, and by their nature are likely to be acceptable in sustainable locations outside of such established industrial sites, such as town centres. Policy E4 Land for industry, logistics and services to support London’s economic function of the London Plan (2021) sets out a list of conforming uses for such sites, with Policy (this one) providing more specifics in relation to appropriate uses. The Council recognise that there are and will be emerging industries that will come forward over the life of the plan which are not listed within the policy. Proposals for emerging industrial uses may be appropriate, and will need to clearly set out how they would be generally consistent with uses within an industrial estate and why such a use would not be appropriate elsewhere.

## Policy LE4: Culture and Creative Industries

*Linkages:*

*NPPF Chapter 6: Building a strong, competitive economy*

*NPPF Chapter 7. Ensuring the vitality of town centres*

*London Plan Chapter 1: Planning London's Future – Good Growth*

*London Plan Chapter 5 Social Infrastructure*

*London Plan Chapter 6 Economy*

*London Plan Chapter 7 Heritage and Culture*

### **Policy LE4 Culture and Creative Industries**

- A. The Council will support proposals for cultural and creative industries where they:
- Are in a location that is appropriate for their use;
  - Are of a size, layout and form that is suitable for the intended use;
  - Do not harm residential amenity or the free flow and safety of the public highway;
  - Take the opportunity to utilise vacant premises in appropriate locations for pop ups or meanwhile uses; and
  - Address the agent of change principle (Policy D12 of the London Plan (2021)).
- B. The Council will support the modernisation and / or the expansion and enhancement of floorspace that serves existing cultural facilities or creative industries where:
- There is a demonstrable need for the extended floorspace; and
  - Relevant policies within the wider development plan are taken into consideration.
- C. The loss of existing cultural facilities or creative industry floorspace will be resisted. Proposals that seek to release floorspace or premises will only be supported where:
- It can be robustly demonstrated that there is no longer any need for the existing use; or
  - The use is able to be provided elsewhere within the borough where:
    - The floorspace is of equal or greater quantum / quality; and
    - The alternative location is within an equally or more accessible location.
  - Alternative cultural or creative industry uses have been considered

## Supporting Text

- 5.4.1 Cultural facilities are essential infrastructure that make up an important element of any place. Harrow has a wide range of assets that are of cultural importance, many of which are associated with the built environment and natural landscapes. Many of the heritage assets in Harrow, such as St Mary's Church atop Harrow on the Hill, are very prominent with views to it from many parts of the Borough. Many others have a more local connection. To the north-east of the Borough, Harrow Weald provides a vantage point across the Borough. These locations are designated as Areas of Special Character, and provide culturally important assets for the Borough. Proposals that may impact on Area of Special Character must consider Policy HE3 of the Local Plan.
- 5.4.2 Cultural facilities can form a range of different end uses such as (but not limited to) theatres, art centres, music venues and cinemas. Whilst these are important assets for culture, they also contribute to social infrastructure and also the economy (often the night-time and evening economy). When proposing to release floorspace from the borough stock, Policy LE2 (Night-time and Evening Economy) and policy CI1 (Safeguarding and Securing Social Infrastructure) must also be considered.
- 5.4.3 The Harrow Economic Needs Study (2024) suggests there is no clear qualitative or quantitative need for additional theatre, music/nightclub or cultural provision. However, there may be potential to increase LB Harrow's low market share and attract more demand from tourist visitors if provision is improved. The Inclusive Economy, Leisure and Culture division will continue to look for opportunities and work with stakeholders to increase the market share through improved provision.
- 5.4.4 The Westminster University Film School is located on the Borough boundary (within London Borough of Brent) and among other end users, in conjunction with the relatively affordable workspace, there is an opportunity to support this industry. Storage for set paraphernalia and props for filming are an essential requirement of the industry, and the small to medium sized storage style warehouses across the borough can provide affordable floorspace and premises. Furthermore, short term events such as art gallery or performance events are capable of taking up vacant premises or space within major developments.
- 5.4.5 The Council recognises the importance of the assets that it has within the borough, both natural and built, which contribute to the attractiveness of the place to live and / or work in or just to visit. For these reasons, the Council will seek to ensure that existing assets are retained, their continued operation and appreciation is protected, and any opportunity to improve them is realised, including improving public access.
- 5.4.6 The Council will support new cultural floorspace where it is located in appropriate sites across the borough, and will encourage such space into town centres, recognising that such floorspace can't always be located in highly

sustainable locations by virtue of availability and affordability of premises and locational and design requirements. Where new floorspace is proposed, applicants will be required to demonstrate how the facility is able to address sustainability matters, and where applicable, set out mitigation measures for facilities not located in sustainable locations.

- 5.4.7 Creative Industries may be considered acceptable within industrial estates where they can be demonstrated that they are an emerging industry and would not compromise successful operation of the wider estate. Any application must demonstrate the appropriateness of its use in any location.
- 5.4.8 Where existing facilities are proposed to be modernised or extended, this will be supported where the extra floorspace is required to enable the ongoing success and function of the use that exists on the site. Where the modernisation or expansion of floorspace results in either a larger footprint or a more intensive use of the site, proposals must demonstrate that there would be no harm to the local area, either through residential amenity or impacts on parking and highway matters. The Harrow Arts Centre is the main centre of culture within the borough, and new development that helps to maintain or enhance this provision, whilst preserving or enhancing its heritage significance, will be supported.
- 5.4.9 Across the borough, vacant premises can provide the opportunity for pop-up or meanwhile uses for a range of uses, including cultural or creative industries. This could include premises that have been vacant for some time, or floorspace within major developments. Whilst premises or floorspace may not be intended to remain vacant across the long term, some pop-up events only seek short term space for an event. Vacant premises or floorspace do not contribute positively to an area, and can also lead to anti-social behaviour issues arising by reason of such spaces being unoccupied and not providing natural surveillance. Where a meanwhile or pop-up use can utilise such space, it enlivens the area whilst providing an opportunity for space to contribute more positively to an area. In particular to creative industries, space can be difficult to obtain and can be expensive for start-up users for arts or creative space. Major developments which provide for non-residential floorspace will be expected to submit (for approval by the Council) a vacancy strategy. This strategy should set out how the non-residential floorspace is able to be let at an affordable cost to temporary users, specifically considering the cultural and creative industries.

## Policy LE5: Tourism and Visitor Accommodation

*Linkages:*

*NPPF Chapter 6: Building a strong, competitive economy*

*NPPF Chapter 7: Ensuring the vitality of town centres*

*London Plan Chapter 1 Planning for London's Future – Good Growth:*

*London Plan Chapter 6 Economy*

### **Policy LE5 Tourism and Visitor Accommodation**

- A. Proposals for new hotel development and serviced apartments will be directed towards Harrow Town Centre and the wider Harrow & Wealdstone Opportunity Area. Proposals for new hotel development and serviced apartments outside of the Harrow & Wealdstone Opportunity Area will be directed to sites in accordance with the following sequential order of preference:
- a. town centres;
  - b. edge of centre;
  - c. highly sustainable locations
- B. Subject to compliance with A above, new tourism infrastructure will be supported where:
- a. the size and character of the site or building are suitable for the proposed use;
  - b. the internal layout provides an appropriate balance between guest sleeping areas and ancillary floorspace (such as reception and dining areas, and staff facilities) commensurate to the use to enable its successful operation
  - b. the development will be compatible with the character and appearance of the area;
  - c. the residential amenities of local residents will not be harmed by way of noise, disturbance, loss of light or privacy;
  - d. it provides a choice of accessible accommodation in accordance with Policy E10H (Visitor Infrastructure) of the London Plan (2021);
  - e. it would not result in an over-concentration of the type of accommodation within the locality;
  - f. there will be good access and links or opportunities for good access and links to modes of transport other than the private vehicle; and
  - g. vehicle access to and from the highway will be safe.
  - h. there are adequate access, drop-off/pick-up and servicing arrangements;
- C. The Council will resist the loss of tourist infrastructure. Any loss of tourism infrastructure will only be supported where:
- a. There is no longer a need for that facility; or
  - b. The redevelopment of the site would result in an over-riding public benefit; and
  - c. Any change in use or redevelopment complies with other policy requirements of the development plan.

- D. The use of a residential property for temporary sleeping accommodation (short term let or holiday let) must not exceed 90 nights within a calendar year. Proposals seeking to exceed this will require planning permission and must consider:
- a. The loss of a single-family home
  - b. Car parking
  - c. Residential amenity
- E. To assist with the circular economy, proposals for tourism accommodation should provide a statement to demonstrate how in the future the design of the proposal could allow its conversion into other uses appropriate for its location.

## Supporting Text

- 5.5.1 In addition to the 11th Century St Mary's Church, Harrow boasts tourist attractions that include Bentley Priory Museum, Headquarters to Fighter Command during the Battle of Britain, Harrow-on-the-Hill, West House, and Headstone Manor and Museum celebrating 1200 years of local history and including The Great Barn once owned by Henry VIII.
- 5.5.2 As an outer London borough, Harrow's tourism economy is still an integral part of the local and wider economy. A strong tourism economy provides opportunities for local residents through jobs and supports local businesses across the borough. The London Plan (2021) estimates that an additional 58,000 bedrooms of serviced accommodation will be needed in London by 2041 and also set out a requirement for Harrow to deliver 347 rooms. The Harrow Economic Needs Study (2024) noted the impact of the Coronavirus pandemic, and forecasts that 270 rooms to be provided within Harrow from 2023 – 2041. The Council will look to meet the demand as set out above through supporting appropriate new and retaining existing hotel / tourist accommodation in appropriate locations.
- 5.5.3 The Borough has excellent links into central London, enables convenient public transport for visits to central London, Wembley Stadium and Wembley Arena and accommodation is often competitively priced. Covid19 has had a significant impact on the tourism infrastructure globally, with London being no exception. There was a sharp fall across the hospitality sectors within West London and Harrow, and most notably in accommodation and food services<sup>34</sup>. However, following the easing of restrictions imposed in relation to Covid19, the sector saw some of the fastest (temporary) recoveries. Notwithstanding any recovery, it is anticipated that the sector will progress with a lower work force than pre-pandemic.
- 5.5.4 Notwithstanding the convenient links into central London, tourism accommodation also provides opportunities to visit local attractions. Specifically, Harrow boasts attractions such as Harrow School, and a number of museums including Heath Robinson, Headstone Manor, and Bentley Priory.

<sup>34</sup> <https://wla.london/wp-content/uploads/2021/04/2021-April-Oxford-Economics-Report-Refresh-how-has-Coronavirus-impacted-the-West-London-economy.pdf>.

The Council has invested in a number of attractions within the borough, with the aim to make these more accessible for the visiting public and viable as an attraction.

- 5.5.5 New hotel and leisure development is directed into the Harrow town centre, reflecting its Metropolitan centre status and in support of the Harrow & Wealdstone Opportunity Area objectives. Throughout the rest of the Borough, the Council will expect proposals for hotel development and other forms of tourism accommodation to locate in town centres to avoid impacts on residential amenity and to benefit from good public transport links and local services.
- 5.5.6 Given the London-wide demand for tourism infrastructure, specifically in relation to a range of tourism accommodation, any loss of such a use would not contribute to meeting the requirements across the plan period. Proposals that seek to reduce tourism infrastructure within the borough will be resisted, unless supported by robust justification. A marketing exercise covering a minimum continuous period of 24 months, including details of commercial agents, advertisements and lease terms offered must support any such application. Submitted evidence will be reviewed by a suitably qualified professional to ensure appropriateness of the marketing. Alternatively, proposals that result in a loss of tourism infrastructure that would form part of a comprehensive development, and which is demonstrated to result in an over-riding public benefit, will be supported.
- 5.5.7 Where the loss of tourism infrastructure is accepted, proposals should first seek to provide employment or community use floorspace where appropriate. Provision of employment space will assist in continuing or increasing the level of footfall, and sustaining the vitality and vibrancy of an area, which in most cases will be a town centre or a highly sustainable location.
- 5.5.8 Any change in use or redevelopment must comply with other policy requirements of the development plan.
- 5.5.9 Guest houses and bed & breakfast accommodation help to provide a choice of visitor accommodation. Such uses also provide business opportunities for residents that contribute to local economic activity. However, care is needed, particularly in residential areas, to balance the impacts of guest house and bed & breakfast uses with the amenity of neighbouring occupiers and the character of the area. Over-intensive use of a property is likely to give rise to disturbance to neighbouring occupiers and could generate an excessive level of external activity by visitors' arrival and departure. Even where individual proposals are acceptable, an over concentration of guest houses and bed & breakfast accommodation in a road or locality can lead to unacceptable cumulative effects.
- 5.5.10 Guest houses and bed & breakfast (short term let or holiday let) must not exceed more than 90 days, this is to ensure the borough's housing stock is maintained. The government is seeking to introduce a new use class, Use Class C5, which will address short term let or holiday let accommodation. Whilst it is noted that such infrastructure can provide an alternative and often

cost-effective option, it can be at the detriment of housing stock for Harrow residents.

- 5.5.11 The Council wishes to encourage tourism that does not harm the environment or residential amenity. New tourist development can widen the cultural and recreational opportunities available to local people for use and employment, making the best use of resources. To support the circular economy, purpose-built tourism infrastructure proposals should be supported by a statement setting how they can be repurposed to change use to other uses that would be appropriate to their locations. Given the sustainable locations of tourism infrastructure, often located in town centres, new builds should be flexible to be capable of multiple end users with minimal intervention. In the event that tourism infrastructure is no longer required (having been demonstrated through compliance with part C of the Policy), retrofitting the shell and core to another use is a much more sustainable option than demolition and rebuild. Furthermore, the flexibility of buildings, especially in town centre locations, assist in such locations being more able to adapt to changing market conditions.



## Chapter 06: Social and Community Infrastructure

## Strategic Policy 06: Social and Community Infrastructure

### Linkages:

*NPPF Chapter 8: Promoting Healthy and Safe Communities*

*London Plan Chapter 5: Social Infrastructure*

*London Plan Chapter 8: Green Infrastructure and the Natural Environment*

*London Plan Chapter 9: Sustainable Infrastructure*

### **Strategic Policy 06: Social and Community Infrastructure**

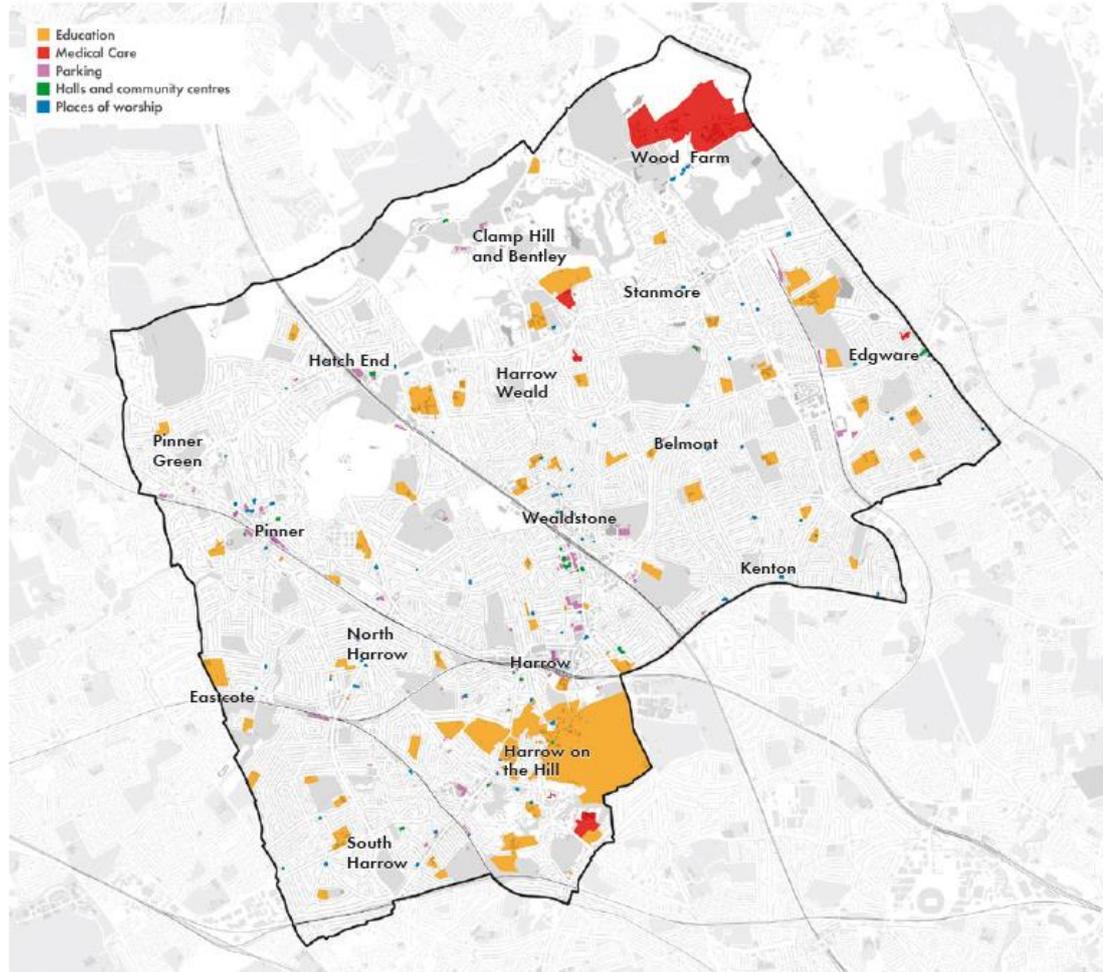
- A. Development must contribute to the protection, enhancement and additional provision of community services and facilities; physical, social, green and blue infrastructure, to adequately address the Borough's existing and future needs. This will be achieved through:
- a. Ensuring new development and growth is co-ordinated and phased in tandem with the provision of appropriate physical and social infrastructure;
  - b. Requiring proposals for new development to demonstrate adequate infrastructure capacity exists or will be provided on and off site to serve the development;
  - c. The development or expansion of physical or social infrastructure, where it is needed to serve existing or proposed development, or required to meet projected future requirements;
  - d. Resisting the loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities contributing to an overall improvement in local provision;
  - e. Requiring all development to contribute to the delivery of strategic infrastructure identified in the Infrastructure Delivery Plan; and
  - f. Utilising the Community Infrastructure Levy (CIL) or any subsequent mechanisms to fund the maintenance and provision of infrastructure through legal agreements.

### Supporting Text:

- 6.0.1 The infrastructure policies in this chapter have been developed in line with the Infrastructure Delivery Plan (IDP 2024). The IDP assesses the current state of infrastructure in Harrow and identifies where additional provision may be required in line with development and population growth. While development is required to create more capacity in our local infrastructure, strategic work must also be undertaken in line with the IDP to use our infrastructure resources more efficiently.
- 6.0.2 The Council will work with stakeholders to identify any infrastructure capacity issues and deliver required infrastructure. Applicants will be required to assess the impact of their proposals on infrastructure and include measures to

facilitate the delivery of new or enhanced infrastructure. Development contributions to infrastructure should be considered in the viability assessment of any proposal.

**Community uses**



Source: Harrow Characterisation and Tall Buildings Study (2021)

Note: selection of community uses to illustrate their indicative range and location.

## Policy CI1: Safeguarding and Securing Social Infrastructure

*Linkages:*

*NPPF Chapter 8: Promoting Healthy and Safe Communities*

*London Plan Chapter 5: Social Infrastructure*

### **Policy CI1: Safeguarding and Securing Social Infrastructure**

#### **New Social Infrastructure**

- A. Proposals will be required to make contributions towards the provision of enhanced or new social infrastructure, in locations where there are existing capacity issues or a need is identified, to support new development.
- B. Proposals relating to new or enhanced social and community infrastructure facilities, including the consolidation of existing facilities, will be supported where they respond to a demonstrable need and:
  - a. Are located in areas easily accessible by public transport, walking and cycling, preferably in town centres or the Harrow and Wealdstone Opportunity Area;
  - b. Are located within the community they are intended to serve;
  - c. Do not adversely impact residential amenity or highway safety;
  - d. Are provided in flexible, adaptable and all abilities accessible buildings, preferably co-located with other social infrastructure uses; and
  - e. Must maximise wider community benefit through utilisation of community use agreements.

#### **Existing Social Infrastructure**

- C. The Council seeks to retain and protect existing social infrastructure and community facilities from loss to alternative uses. Any proposals that result in loss of these uses will be resisted, unless proposals can adequately demonstrate that:
  - a. There is no longer a need for the current use (as evidenced by 24 months of effective marketing), and there is no projected future need, or the site is unsuitable for the current use and there is no need for any other suitable community use on the site; and
  - b. The loss of social infrastructure would not result in a shortfall in provision of that use; or
  - c. A replacement facility is provided that would better meet the specific needs of existing and future users in regard to quantity, quality and location; or
  - d. Redevelopment would secure enhanced social infrastructure re-provision (on or off-site) ensuring continued delivery of social infrastructure and related services.
- D. Any proposal to redevelop an existing social infrastructure site should prioritise the use of the site for an alternative social infrastructure use.

**Supporting text:**

- 6.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities, as outlined in the London Plan. Sport and Recreation infrastructure requirements are dealt with explicitly in Policy CI3.
- 6.1.2 Social infrastructure plays an important role in developing strong and inclusive communities. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.
- 6.1.3 The council will work closely with the community and stakeholders to identify infrastructure needs across the borough, and work to secure timely delivery of high-quality infrastructure and services. The Infrastructure Delivery Plan (IDP) will be used in conjunction with relevant corporate plans and strategies to plan the roll out of new and improved social infrastructure.
- 6.1.4 Development must be supported by new or enhanced social infrastructure to ensure that quality of life in the borough is improved. Opportunities for the delivery of enhanced or new infrastructure are scarce due to constrained nature of the built-up area and other development pressures. Therefore, existing social and community infrastructure sites will be protected for ongoing community use where possible. The policy seeks to enable the development of new social infrastructure and the protection of existing facilities from redevelopment pressure to competing land uses. New and improved infrastructure should have no negative impact on the natural environment in line with Chapters 7 and 8.
- 6.1.5 The loss of social infrastructure can have a detrimental effect on communities, therefore it will be avoided unless justified having regard to the overall need for infrastructure in the borough and any site-specific considerations.
- 6.1.6 Any proposals involving the loss of a community use should be evidenced by 24 months of continuous effective marketing, at a reasonable market rate. Evidence should include various examples of online and local marketing through reputable agents. Where it can be demonstrated that healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, the requirements listed under Part C and D of the Policy will not apply.

- 6.1.7 The Council is working with faith groups to identify burial space to suit their needs. A needs assessment has been undertaken to identify burial space requirements over the plan period and work to identify sites for burial space expansion is ongoing. The Council will continue to engage through Duty to Cooperate meetings with other boroughs, highlighting West London burial space needs as a consideration. Proposals for new burial sites in the meantime would be assessed against the criteria in this policy to the extent that they are relevant to such a use, as well as any other applicable policies relating to the specific site or proposal.

## Policy CI2: Play and Informal Leisure

*Linkages:*

*NPPF Chapter 8. Promoting healthy and safe communities*

*London Plan Policy S4: Play and Informal Recreation*

### **Policy CI2: Play and Informal Leisure**

Development proposals that are likely to be occupied or used by children and young people must increase opportunities for play and informal recreation.

- A. Development proposals for new housing must incorporate well-designed and high-quality formal play provision of at least 10 square metres per child.
- B. Play space provision should be delivered on-site and made accessible to all children in the development. Where development is to be phased, there should be early implementation of play space. All play space must be designed to:
  - a. Ensure public access is not unreasonably restricted in major developments,
  - b. Provide a safe and stimulating environment for all age groups and abilities represented in the development,
  - c. Provide rest and amenities areas for children and parents (i.e benches, shade, access to water, etc), and
  - d. Incorporate landscaping and permeable surfaces.
- C. Off-site provision of play and recreation space will only be acceptable in exceptional circumstances, where it is demonstrated that:
  - a. On-site provision is not feasible and there is existing play space, or
  - b. New provision will be delivered within proximity to the development and can be accessed safely and easily by residents.
- D. Development proposals resulting in the loss of play space will be refused unless replacement provision of at least an equivalent amount and improved quality will be provided.

### **Supporting Text:**

- 6.2.1 Development should provide opportunities for high-quality, accessible children's play space to support and encourage active living. Safe and stimulating play spaces have a positive impact on physical and mental wellbeing of both children and parents. Play facilities are an important tool in the fight against childhood obesity and also provide opportunities for social interaction and development in young people.
- 6.2.2 In line with the London Plan, new residential developments must provide formal play space of at least 10 square metres per child in order to address child occupancy requirements. Provision should be proportionally based on the number of children expected to occupy the development and an assessment of future needs. The GLA's play space calculator can be used to find and evidence the level of play space required.

- 6.2.3 Play space should be delivered on-site. Off-site provision will only be considered in exceptional circumstances where it is demonstrated; on-site provision is not feasible and there is existing play space, or new provision will be delivered within proximity to the development and can be accessed safely, easily by residents. Applicants will be required to provide evidence to demonstrate that delivery on-site is not feasible, including a design options appraisal, and assurance that the need generated by the development will be adequately met.
- 6.2.4 All new play space should be delivered through a carefully considered design-led approach with the end user in mind. Play space and other outdoor communal amenity space should be integrated at the street or ground floor level. The siting of provision on rooftops should be avoided where possible as this may impede safe access. Developments should maximise opportunities to integrate nature and 'green' features into play space, including tree planting and landscaping. This provides a pleasant environment that contributes to informal play, climate change mitigation and biodiversity uplift.
- 6.2.5 Play space should be designed in a way that is accessible to all children and parents regardless of ability. Play England's 'design for play' guide should be used to guide the design of play spaces, particularly with regard to all abilities access.

## Policy CI3: Sport and Recreation

*Linkages:*

*NPPF Chapter 8. Promoting healthy and safe communities*

*London Plan Policy S5 Sports and Recreation Facilities*

### **Policy CI3: Sport and Recreation**

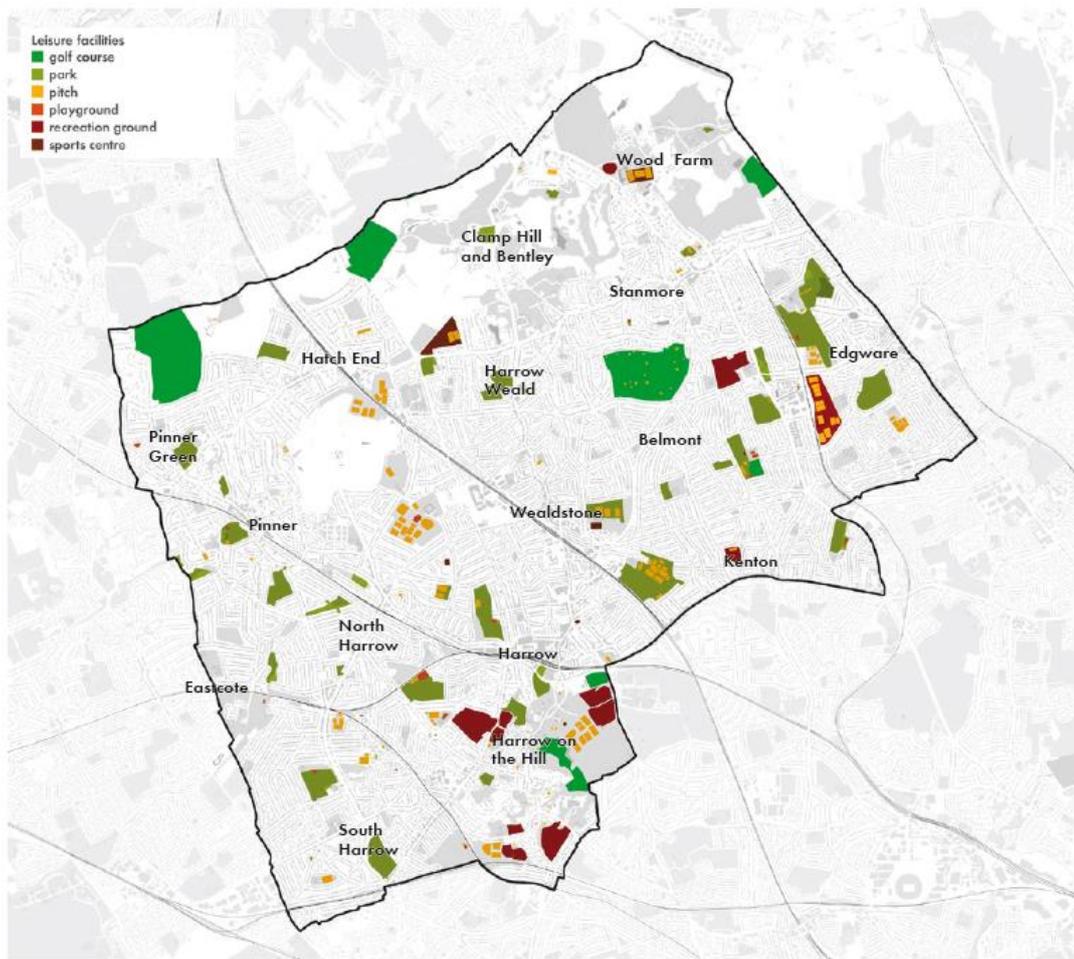
- A. Proposals that would increase the capacity and quality of outdoor sport and recreation facilities, and those that would secure community access to private facilities, will be supported provided that:
  - a. There would be no conflict with Green Belt, Metropolitan Open Land or open space policies;
  - b. The proposal would not have a detrimental impact on any heritage significance or biodiversity assets within or surrounding the site; and
  - c. There would be no adverse impact on residential amenity or highway safety.
- B. Proposals for uses that would support existing or proposed outdoor sport and recreational facilities will be supported where they are:
  - a. Ancillary in terms of size, frequency, use and capacity; and
  - b. Do not displace or prejudice facilities needed for the proper functioning of the principal outdoor sport and recreational uses.
- C. Proposals for floodlighting will be supported where they would:
  - a. Enhance outdoor sport and recreation facilities; and
  - b. Not detrimentally impact the character of open land, the amenity of neighbouring occupiers or biodiversity.
- D. All proposals (excluding minor applications) should facilitate community access to sport and recreation facilities through a community use agreement, unless it can be demonstrated that it is not feasible.
- E. Proposals which would lead to the loss of, or would prejudice the use of a sports or recreation facility will be resisted unless:
  - a. Any loss of facilities would be replaced by equivalent or better provision in terms of quantity and quality, in a suitable location in accordance with Policy CI1 (Safeguarding and securing new Social Infrastructure); or
  - b. The development is for alternative sports and recreational provision for which the identified need clearly outweighs the loss of the existing facility.

### **Supporting text:**

- 6.3.1 The provision of formal and informal sport and recreation facilities encourages physical activity and delivers a range of social, health and wellbeing benefits to communities.
- 6.3.2 The Harrow Indoor and Outdoor Sports Facilities Strategy (2023 – 2037) assesses existing and future needs for sporting infrastructure provision across the borough. The aim of the document is to ensure the on-going provision of high-quality, accessible playing pitches and built sport facilities to meet the needs and demands of the borough’s current and future populations.

- 6.3.3 The Strategy identifies key objectives and local needs (current and projected to 2037), including:
- (a) The need to replace or improve existing Leisure and recreation facilities;
  - (b) Additional pressures arising from a growing, ageing and changing population;
  - (c) The need to protect future usage and extend access to facilities where possible;
  - (d) The important role the Council plays as an enabler in developing better quality facilities in partnership with Sport England and National Governing Bodies of Sport;
  - (e) The role of sport and physical activity to support residents and visitors through recovery from the pandemic and the cost-of-living crisis.
- 6.3.4 The document provides evidence that Harrow’s sporting infrastructure needs to be protected and enhanced in line with population growth, and existing deficits addressed where possible. Sport and recreation facilities are detailed in the Infrastructure Delivery Plan as essential infrastructure. Any development should consider projects identified in the IDP for infrastructure contributions. Any loss of sporting infrastructure resulting from development must be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
- 6.3.5 New and upgraded sport and leisure facilities should ensure that sustainable transport options are prioritised for users to minimise reliance on cars for access.
- 6.3.6 Sport and leisure facilities should ensure that all abilities access and amenity is provided on site.
- 6.3.7 Community use agreements will be secured by the planning authority in the form of a legal agreement with the landowner. Sport England’s community use agreement guidance and templates should be utilised in this process.
- 6.3.8 Harrow will continue to work with strategic partners such as Sport England to assess and respond to demand for sporting infrastructure, and seek arrangements to ensure community access to facilities within the borough.

### Leisure Facilities



Source: Harrow Characterisation and Tall Buildings Study (2021)

## Policy CI4: Digital and Communications Infrastructure

*Linkages:*

*NPPF Chapter 10. Supporting high quality communications*

*London Plan Policy SI6 Digital Connectivity Infrastructure*

### **Policy CI4: Digital and Communications Infrastructure**

- A. Proposals for the installation of telecommunications equipment will be supported where:
  - a. The installation would be on an existing mast or building or, if a new mast is proposed, it has not been possible to find a suitable existing mast or building to meet operational requirements;
  - b. The siting and design of the installation would minimise its impact upon the amenity of neighbouring occupiers, the host building (where relevant), and the appearance and character of the area;
  - c. There would be no unacceptable impact upon areas of designated open space, heritage, landscape and biodiversity value;
- B. Where installation of telecommunications infrastructure is required to support the effective functioning of the emergency services, compliance with A. above may not be feasible. These applications will be determined on a case by case basis, based on evidence submitted by the applicants.
- C. Existing communications infrastructure (i.e. masts, cabinets, aerials, etc) and sites must be utilised where possible to minimise over proliferation of equipment. Any grounds for rejecting co-location of infrastructure or sites must be clearly justified.

### **Supporting Text:**

- 6.4.1 High-speed, reliable digital connectivity is a necessity for businesses, students and individuals, playing an important role in maintaining a competitive local economy, attracting new investment and creating jobs in the Borough. Infrastructure that supports the operation of digital connectivity should be planned for and facilitated by infrastructure providers and the Council.
- 6.4.2 The pandemic created new cultural shifts for businesses and residents with increased rates of people working from home and utilising video calls. This has created a significant demand and reliance on digital technology and broadband connections.
- 6.4.3 To meet these needs, the Council will continue to work with private sector providers to roll out required infrastructure. This will ensure Harrow has a high-quality broadband fibre network and mobile phone services for its residents and businesses. Providers and planning agents are encouraged to engage with the council through digital infrastructure pre-application services to establish plans and address any issues early in the planning process.

- 6.4.4 Rates of full-fibre broadband connectivity are lower in Harrow than the London average. Several key projects have been identified in the Harrow Infrastructure Delivery Plan (IDP) to increase connectivity rates.
- 6.4.5 Development proposals must demonstrate how they will improve digital connectivity on sites located in areas where full-fibre broadband, or equivalent infrastructure, is not currently available or on sites that are otherwise poorly served by broadband coverage, including in designated employment areas and town centres. Proposals must address the findings of Harrow's Infrastructure Delivery Plan.
- 6.4.6 Digital and communications infrastructure should utilise existing sites or equipment where possible to minimise on-street and visual clutter. Evidence that providers have assessed opportunities for sharing of infrastructure needs to be provided as part of any application for new infrastructure. The proliferation of new telecommunications structures should be kept to a minimum, ensuring visual impacts are appropriately mitigated. All digital and communications infrastructure should be neatly and discretely screened to minimise visual clutter.
- 6.4.7 Advertisements associated with wi-fi or telecommunications infrastructure must be proportionate to the overall structure, and must not lead to an over proliferation within a locality, in line with Policy GR12 (Advertisements, digital displays and hoardings).
- 6.4.8 Opportunities for the rationalisation or screening of equipment already installed on existing masts, buildings and street cabinets should be explored.
- 6.4.9 Where new telecommunications provision is crucial to the operations of the emergency services, such provision should be enabled without undue impediment in the interests of the safety of Harrow residents.



## Chapter 07: Green Infrastructure

## Strategic Policy 07: Green Infrastructure

*Linkages:*

*NPPF Chapter 15. Conserving and enhancing the natural environment*

*London Plan Chapter G1: Green Infrastructure*

### **Strategic Policy 07: Green Infrastructure**

- A. Green infrastructure should be identified, protected, restored, enhanced, and extended. The planning, design, and management of green infrastructure should be integrated, and the context carefully considered to ensure the most appropriate benefits are targeted, maximised and maintained.
- B. Access to green infrastructure will be enhanced where appropriate.
- C. Green Belt and Metropolitan Open Land (MOL) will be protected from inappropriate development in line with Policy GI1 (Green Belt and MOL).
- D. Development will not be permitted on designated open space, other than for small-scale, ancillary facilities needed to support or enhance the proper functioning of the open space in line with Policy GI2 (Open Space), the only exception to this would be for sporting facilities in line with Policy CI3.
- E. There should be no net loss of green space in the borough. Additional green space provision will be supported.
- F. The quality and functionality of green infrastructure will be enhanced.
- G. Biodiversity should be enhanced both retrospectively and in new development, particularly where this will strengthen local ecological networks or address deficits in line with policy GI3 (Biodiversity);
- H. Drainage is considered, and flood risk reduced giving priority to natural SuDS provision in line with Policy CN4 (Sustainable Drainage);
- I. Green spaces should be multifunctional providing a range of ecosystem services and benefits, targeting local need
- J. Green spaces should support the historic environment through their ability to enhance heritage assets and link to local history;
- K. The retention and integration of existing trees, and new tree planting, will be encouraged, in line with Policy GI4 Urban Greening, Landscaping and Trees;
- L. Local food growing measures (allotments, urban gardens, stop and grow) will be supported in line with Policy GI5 (Food Growing);
- M. Opportunities for cross-borough collaboration and the consideration of green infrastructure in an integrated way as part of a network will be pursued.

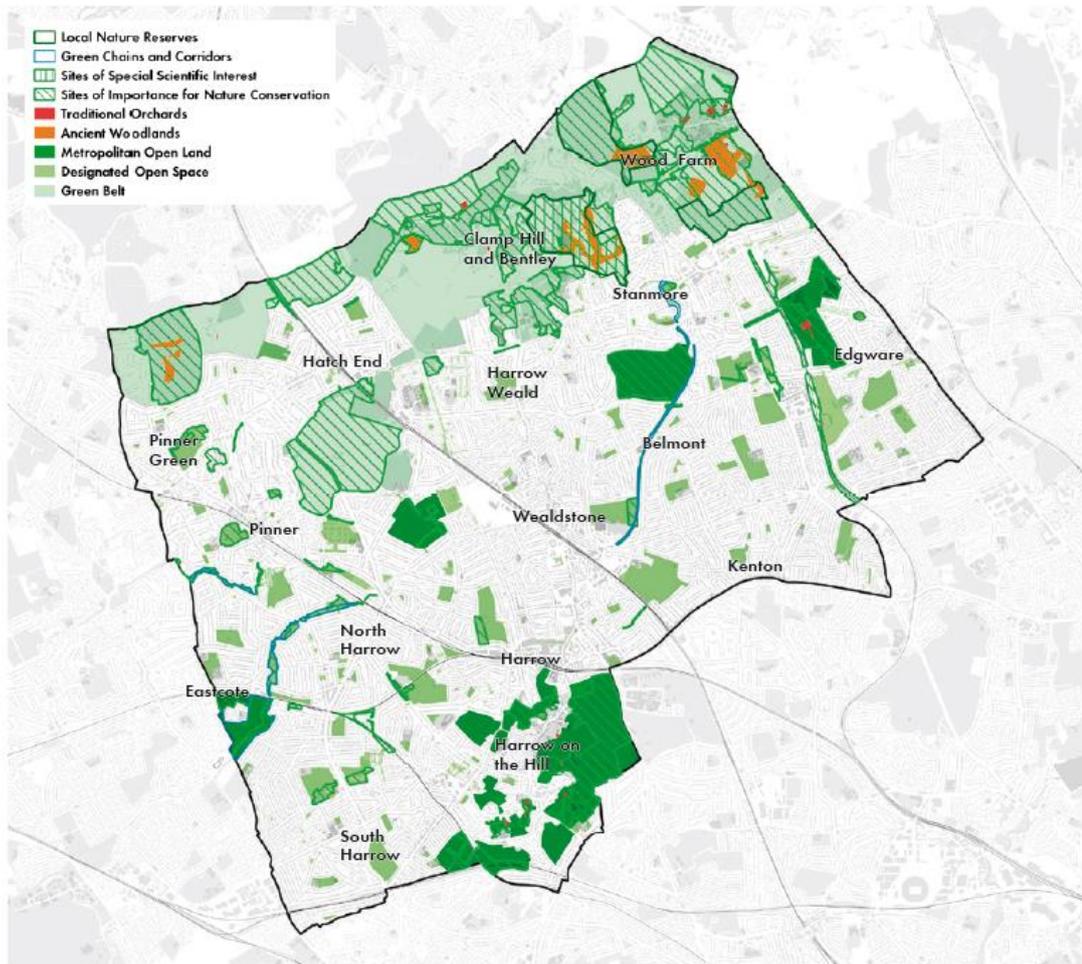
### **Supporting Text:**

- 7.0.1 The term ‘Green Infrastructure’ refers to the network of blue and green spaces, parks and gardens, nature reserves, sports pitches and playing fields, allotments, cemeteries, trees and woodlands, green roofs and drainage systems, The type, condition and degree of connectivity of the natural capital features that form part of the borough’s green infrastructure assets determines the extent and nature of the ecosystem services they provide in supporting

human wellbeing and quality of life. Maximising the value and benefits derived from these assets, requires planning, design, and management.

- 7.0.2 All development should avoid putting pressure on vulnerable ecosystems and mitigate risk through careful planning of green infrastructure, in line with Paragraph 159 of the NPPF 2023.
- 7.0.3 Metropolitan Open Land and Green Belt spaces provide some of Harrow’s largest green infrastructure assets. These are protected from inappropriate development through the London Plan and NPPF. Private gardens, green spaces, green corridors, and landscaped areas are also green infrastructure assets requiring protection, enhancement and reconnection, particularly in areas deficient in natural capital.
- 7.0.4 Green infrastructure and the natural capital it supports will play an increasingly pivotal role in keeping the borough liveable and providing equitable public goods from which everyone should benefit. Green infrastructure plays several important roles, including:
- (a) Cooling our cities and combatting the urban heat island effect,
  - (b) Minimising flooding by providing enabling natural drainage,
  - (c) Removing pollution from the air and creating oxygen,
  - (d) Supporting and providing access to bring about higher levels of biodiversity.
- 7.0.5 Improvements in green infrastructure provision can facilitate mental and physical health and wellbeing, climate change mitigation and adaptation, water and air quality improvements, active travel (walking and cycling), ecological connectivity and resilience, wildlife conservation and habitat condition and local food growing, as well as traditional aspects such as play, sport and recreation. The design of green infrastructure should follow the statutory biodiversity matrix, ensuring that elements are resilient to climate change and well managed.
- 7.0.6 Blue infrastructure is discussed further in Chapter 08, however it is important to note that any development that contains blue infrastructure assets should follow Environment Agency guidelines and any future guidance produced by the Council.
- 7.0.7 While this policy aims to protect and enhance Harrow’s environment, there are ongoing examples of front and rear gardens being hard surfaced, and vegetation removal contributing to biodiversity loss and climate risks in the borough. The council will resist proposals that do not contribute to a clean and green borough or impact on ecosystem services.

### Green and Blue Infrastructure



Source: Harrow Characterisation and Tall Buildings Study (2021)

## Policy GI1: Green Belt and Metropolitan Open Land

*Linkages:*

*NPPF Chapter 15. Conserving and enhancing the natural environment*

*London Plan Policy: G2 London's Green Belt*

*London Plan Policy: G3 Metropolitan Open Land*

### **Policy GI1: Green Belt and Metropolitan Open Land**

- A. Green Belt Land:
- Any proposals for development in the Green Belt will be considered in accordance with the NPPF.
  - Development adjacent to Green Belt should not have a significant detrimental effect on the openness of the Green Belt, and must respect the character of its surroundings.
- B. Metropolitan Open Land (MOL):
- In accordance with the London Plan, Metropolitan Open Land is to be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.
- C. Proposals for the beneficial use of land in the Green Belt and MOL will be supported where the use would not have an inappropriate impact on the openness and permanence of the Green Belt and MOL, having regard to:
- Visual amenity and character;
  - Potential to enhance public access as part of the Green Grid;
  - Use of land for food growing or community gardening;
  - The protection and enhancement of heritage assets;
  - Biodiversity improvements;
  - Natural capital improvements.

#### Redevelopment or Infilling of Sites

- D. Proposals for the redevelopment, infilling or partial infilling of previously developed sites in the Green Belt and MOL will only be supported where the proposal would not have a greater impact on the openness and permanence of the Green Belt and MOL, and the purposes of including land within it, than the existing development, having regard to:
- The height of existing buildings on the site;
  - Visual amenity and character of the site and surrounds;
  - The proportion of the site that is already developed;
  - The footprint, distribution and character of existing buildings on the site; and
  - The relationship of the proposal to any retained development on the site.
- E. Proposals on Green Belt or MOL land that may not be in accordance with the NPPF should be put forward in the context of a comprehensive, long term plan(s) for the site as a whole.

### Inappropriate and Harmful Development in the Green Belt and Metropolitan Open Land

F. Proposals for inappropriate development, or redevelopment which would harm the essential characteristics or purpose of the Green Belt or Metropolitan Open Land will be refused in the absence of clearly demonstrated very special circumstances.

## Supporting Text

- 7.1.1 Harrow's Green Belt accounts for 21.6% of Harrow's land area, and benefits from a variety of uses that help to maintain its openness and character. As well as a number of farmland and woodland areas, uses of the Borough's Green Belt include sports grounds, public open space, nature reserves and burial space. The Green Belt's purpose is to provide a break between urban areas and rural areas.
- 7.1.2 Metropolitan Open Land is strategic open land located in the urban area and is specific to London. MOL uses in the Borough include parks, outdoor sports pitches, golf courses and allotments.
- 7.1.3 Beneficial uses of Green Belt and Metropolitan Open Land help to sustain their openness and usefulness for the current and future generations.
- 7.1.4 The NPPF and London Plan strongly advocate for the protection of Green Belt and MOL land. The primary aim of the Green Belt is to prevent urban sprawl by keeping land permanently open.
- 7.1.5 Inappropriate development is, by definition, harmful to the Green Belt and will not be approved except in very special circumstances. Very special circumstances arise when harm resulting from a proposal is clearly outweighed by other considerations.
- 7.1.6 Harrow's MOL should be protected from inappropriate development in accordance with the same national planning policy tests that apply to the Green Belt. Proposals that enhance community access to MOL or provide additional appropriate benefits for the community will be encouraged. Examples include improved public access, inclusive design, sport and recreation facilities, habitat creation, landscaping improvement and flood mitigation.
- 7.1.7 A significant strategic redevelopment opportunity exists at the Royal National Orthopaedic Hospital (RNOH), an existing Green Belt use. The Hospital is a nationally and internationally recognised facility located in the Green Belt at Brockley Hill, Stanmore. The hospital complex is spread over a substantial site area and occupies many outdated, substandard buildings. Redevelopment of the site offers the potential to provide a modern, fit for purpose accommodation that befits the hospital's status, and improves the openness of the site by rationalising the footprint of the buildings. The desirability of

providing new accommodation for the hospital is a significant consideration and may constitute very special circumstances for enabling development that would otherwise be inappropriate development in the Green Belt. Redevelopment proposals should be in line with masterplans agreed by the Council to ensure compliance with green belt development requirements. Related or ancillary uses (i.e. research facilities) may also be appropriate on the site where these would benefit from co-location or represent enabling development.

- 7.1.8 Another strategic Green Belt redevelopment opportunity exists at Harrow College. The College is currently spread over two sites, with the principal campus located in Lowlands Road, Harrow Town Centre. Parts of the site are substantially open in character and should remain so; redevelopment will be confined within the boundary shown in the Policies Map. The original college building on the site is of some local architectural and historic merit and every effort should be made to retain it. However, the wider complex contains many later additions, the potential redevelopment of which could secure rationalisation of built form and enhance the site's contribution to Green Belt openness. Open land to the north of the existing complex of buildings could form an extension to Harrow Weald cemetery.
- 7.1.9 Biodiversity improvements on MOL of Green Belt land will be encouraged in line with Policy G14 (Biodiversity) and must be a consideration for all forms of development. Harrow's two Sites of Special Scientific Interest and the majority of the Borough's Sites of Importance for Nature Conservation (SINC) are located in the Green Belt, contributing to the character, openness and biodiversity value of the area. Food growing (allotments) and community gardens will be encouraged on MOL and Green Belt land.

## Policy GI2: Open Space

*Linkages:*

*NPPF Chapter 15. Conserving and enhancing the natural environment*

*London Plan Policy: G4 Open space*

### **Policy GI2: Open Space**

- A. Development proposals must:
  - a. Contribute to the provision, protection and enhancement of high quality, multi-functional, publicly accessible open space, particularly in areas of deficiency;
  - b. Not result in the net-loss of open space;
  - c. Improve access to green space where appropriate, including natural green space, particularly in areas where deficiencies in access have been identified; and
  - d. Enhance biodiversity and improve access to biodiversity and natural capital.
- B. Major development proposals must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions will be required.
- C. Existing open space, sports pitches, recreational buildings, and playing fields should not be built on unless:
  - a. An assessment has been undertaken that clearly demonstrates the open space, buildings or land are surplus to requirements; or
  - b. The loss resulting from the proposed development would be replaced by equivalent or better provision, in terms of quantity and quality in a suitable location; or
  - c. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use, or
  - d. The proposal is for a small ancillary use (maintenance shed, food & beverage, changing rooms) that would enhance the useability of the space and surrounds, or
  - e. The development is required for critical social infrastructure, the positive benefits of which clearly outweigh the loss of the current or former use.

### **Supporting text:**

7.2.1 Open Space is a vital component of London's open space network and, more locally, the West London Green Grid, which contributes significantly to the environmental quality and natural capital of the borough and surrounds. Access to a network of high-quality open spaces including wild and natural green spaces, and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

- 7.2.2 Much of Harrow is relatively well served by parks and open spaces. However, since the pandemic there has been increased usage and damage to Harrow's open spaces. This is evidenced by Harrow's performance in the Good Parks London rankings, falling from 11<sup>th</sup> out of 32 London Boroughs in 2018, to 26<sup>th</sup> out of 29 London Boroughs in 2022<sup>35</sup>.
- 7.2.3 Several areas within the borough have a deficiency in access to green space. The south and central areas of the borough have a deficiency in the quantity of open space provision. Much of the Borough is more than 400m from a public open space of at least 2ha. There are particular areas of deficiency in accessibility in the centre of the Borough including around the Belmont Local Centre, in the part of the Opportunity Area between Harrow and Wealdstone, between Pinner and Hatch End and around Rayners Lane. Work must be undertaken to improve the number and quality of open spaces in these areas in line with the Harrow Open Space PPG17 Study (2011), and the Harrow Sports Facilities Strategy (2023).
- 7.2.4 Where development is proposed on existing open space, sports pitches, recreational buildings, and playing fields an assessment must be undertaken that demonstrates that the space is surplus to requirements. This assessment should consider the Council's Sports Facilities Strategy (2023), and Sport England Guidance. For the purpose of this policy, critical infrastructure is defined as being a physical facility, structure or asset essential to the social or economic functioning of the borough. This infrastructure should be identified in the Infrastructure Delivery Plan or agreed by the Council.
- 7.2.5 Open space should be taken into account in planning for new development and considering proposals that may affect existing open space in the borough. Upgrades have been made to several key sites in recent years, although more work is required to secure a greater number of green spaces, adding to the Harrow Green Grid and improving the quality of the existing spaces in the borough.
- 7.2.6 Opportunities exist to improve the quality of open spaces including nature sites and the connections between them; protecting and adding to residents' opportunities for access to nature and the benefits this provides. Open spaces that are well-designed and well-managed for people and nature can provide a range of other ecosystem benefits. To realise these, development must support the provision, protection and enhancement of open spaces. Development must maintain and wherever possible enhance access to, and connections between the network of open spaces within and outside the Borough, prioritising measures that encourage walking and cycling.
- 7.2.7 Development proposals located adjacent to open space must respond positively to the character of the open space as well as protect, and wherever possible enhance, the biodiversity value and visual amenity provided by the space.

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<sup>35</sup> <https://parksforlondon.org.uk/wp-content/uploads/2022/12/Good-Parks-for-London-2018.pdf>

7.2.8 This policy applies to both publicly accessible or owned, and private open space, sports pitches, recreational buildings, and playing fields.

**Open Space: Wood Lane Pond (top), Pinner Memorial Gardens (bottom)**



## Policy GI3: Biodiversity

*Linkages:*

*NPPF Chapter 15. Conserving and enhancing the natural environment*

*London Plan Policy: G6 Biodiversity and access to nature*

### **Policy GI3: Biodiversity**

#### Protection of Biodiversity & Natural Capital

- A. Biodiversity and natural capital must be protected, enhanced, extended and connected. Development proposals must contain a biodiversity plan including an appropriate biodiversity net gain metric, a Preliminary Ecological Assessment (where appropriate) and an on and offsite mitigation and management plan unless exempt under the Environment Act 2021.
- B. The Ecological Mitigation Hierarchy, to avoid impact, mitigate, and as a last resort compensate must be followed when considering habitats and protected and priority species.
- C. Development proposals must not result in loss of, or pose direct or indirect negative impacts to:
  - a. Irreplaceable habitats (e.g. ancient woodland) or features (e.g. ancient/veteran trees)
  - b. Sites nationally or internationally designated for nature conservation or geodiversity
  - c. Sites of Importance for Nature Conservation/ Regionally Important Geological Sites
  - d. Core areas identified within the Local Nature Recovery Strategies (LNRSs) for London or Hertfordshire
  - e. Other important sites, features or functions where losses or impacts could not be adequately mitigated or compensated for with regard to:
    - i) LNRS areas;
    - ii) Areas of priority habitat;
    - iii) Important features (e.g. historic hedgerows);
    - iv) Green or blue corridors or other functional linkages within the local ecological network; and
    - v) Ecosystem function or resilience.
- D. All proposals must consider the presence of protected and priority species and submit up to date surveys where appropriate and appropriate mitigation strategies for their continued protection, within the site if at all possible.
- E. Development proposals that would increase deficiencies in access to nature will be resisted.

#### Biodiversity and nature recovery

- F. Development proposals should:
  - a. Conserve, enhance, extend and connect Harrow's biodiversity;
  - b. Utilise nature-based solutions to manage environmental pressures;
  - c. Strengthen the Borough's natural capital;

- d. Improve access to nature where this does not impact important habitats and species
- G. All major and minor development proposals must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain. Proposals will be required to demonstrate compliance with the criteria below and provide:
- a. A minimum of 2 biodiversity units per hectare; or
  - b. A minimum net uplift in biodiversity unit value of 15%, whichever is greater; and
  - c. A minimum of one biodiversity enhancement per residential dwelling; and
  - d. Details surrounding the delivery, monitoring and maintenance of BNG units, whether wholly on-site, or utilising locally strategic off-setting location(s).

### Supporting text:

- 7.3.1 Nationally, the UK has experienced extreme losses of biodiversity over the last 50 years, and is now one of the most nature-depleted countries on earth<sup>36</sup>. Recently, there has been greater recognition of the value of nature and its role in mitigating climate change. It is now considered imperative that greater efforts are made to better manage land and restore ecosystems.
- 7.3.2 The 25-year Environment Plan and Environment Act 2021 together set out the framework for a national Nature Recovery Network to manage and enhance landscape scale corridors throughout Britain. Local authorities are responsible for the provision of this network with the preparation of Local Nature Recovery Strategies (LNRS) required under the Environment Act.
- 7.3.3 Harrow shelters a wide variety of threatened habitats and species which are identified within the Harrow Biodiversity Action Plan. Threats to Harrow's local biodiversity include increased recreational pressure, air pollution, climate change, development, habitat fragmentation, water use and pollution, and vandalism. The Local Plan aims to combat or mitigate each of these pressures.
- 7.3.4 To ensure that biodiversity degradation in Harrow is reversed, the council has set a biodiversity net gain target of a minimum 15% increase in habitat value compared with the pre-development baseline. This will be calculated using an appropriate Biodiversity Net Gain Metric. Biodiversity net gain should be fully integrated into a design-led approach with consideration given to the site context and wider landscape setting. This decision has been made after consideration of the challenges faced by wildlife within a densely packed

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<sup>36</sup> State of Nature Report 2023 [https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report\\_2023\\_FULL-DOC-v12.pdf](https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf)

urban setting and the additional requirements for connected corridors that this engenders.

- 7.3.5 Viability testing has found that requiring a 15% uplift in biodiversity unit value has a minor impact on the viability of development in Harrow and can therefore be viably absorbed by development.
- 7.3.6 Development proposals must submit a preliminary ecological assessment which identifies habitats within and surrounding the development site and assess potential impacts. Proposals should demonstrate how the development will be designed to avoid, mitigate or compensate habitat impacts and when biodiversity units are be recreated within a habitat bank offsite. The NPPF sets out principles for determining planning applications where there is potential harm to biodiversity, as does the London Plan.
- 7.3.7 Onsite habitats should be secured and maintained for as long as the development exists. Maintenance payments for off-site biodiversity units should cover a minimum of 30 years. Planning conditions and/or legal agreements may be used to secure Management Plans to ensure that any retained restored and/or recreated habitats on or off site are managed to attain the highest gains possible for wildlife. Where a development is unable to achieve the appropriate level of net gain onsite, offsite habitat units must be purchased and agreed with the Council and be equivalent to the units lost and the gain required.
- 7.3.8 Where adverse impacts to biodiversity are identified within a development the consideration of the mitigation hierarchy must be evidenced within any planning application. The hierarchy of mitigation measures is as follows:
- (a) Avoid damaging the ecological habitats and safeguard protected and priority species present within the site, by designing the development to incorporate the habitats and safe corridors in and out of the site;
  - (b) Minimise the overall impact and mitigate it by substantially improving the quality or management of the remaining natural habitats and important faunal populations; and
  - (c) Deliver on and off-site compensation of an equal or higher biodiversity value.
- 7.3.9 All types of development should aim to incorporate wildlife enhancement. These could include a green or brown roof and living walls, bat, bird and invertebrate bricks and boxes bird feeding stations and baths, hibernacula loggaries and log piles, nectar bars, wildlife ponds or scrapes and hedgerow planting. This list is not exhaustive, and the enhancements should reflect the species present on site and within the surrounding areas. Where possible enhancements should be built into the building's structure to ensure that it cannot be removed at a later date. Planting scheme should comprise at least 80% indigenous species with the remainder being of value to wildlife.

- 7.3.10 All proposals should make provision for the eradication of Invasive Non-native Plant species listed on Schedule 9 of the Wildlife and Countryside Act and/or by London Invasive Species Initiative where these occur on site.
- 7.3.11 Some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of the host development and any other site should be assessed against statutory safeguarding zones and the Ministry of Defence should be consulted where significant elements are in the statutory safeguarding zone for RAF Northolt.

## Policy GI4: Urban Greening, Landscaping and Trees

*Linkages:*

*NPPF Chapter: 15. Conserving and enhancing the natural environment*

*London Plan Policy G5 Urban Greening & Policy G7 Trees and Woodlands*

### **Policy GI4: Urban Greening, Landscaping and Trees**

- A. Development proposals must demonstrate that a design-led approach has been used to maximise opportunities for local greening. Proposals should include the integration of high quality and species diverse landscaping, trees, wildlife habitat, green roofs, green walls and Sustainable Drainage Systems, giving preference to native species where possible.
- B. Major development proposals must increase the overall value of green cover on site to achieve the London Plan recommended Urban Greening Factor (UGF), unless it can be adequately demonstrated that this is not feasible. Predominantly residential development should achieve a UGF score of 0.4. Predominantly commercial development should achieve a score of 0.3. Existing green cover retained on-site will count towards the UGF score. Planning contributions will be sought where the required level is not achieved on-site in order to secure offsite provision.
- C. All new development should retain and integrate existing trees of value into the site layout. Opportunities for additional tree planting and habitat creation should be maximised. There is a presumption in favour of retaining and integrating existing trees, woodlands and hedgerows within development sites.
- D. Trees identified for retention must be protected during the construction phase of development, with appropriate Root Protection Areas identified and safeguarded. Should such trees be lost or damaged, they must be replaced upon completion of the development in line with paragraph F below.
- E. Planning permission will be refused where proposals would result in the loss of or harm to:
  - a. Trees subject to a TPO
  - b. Ancient woodlands, Ancient or Veteran trees, or hedgerows
  - c. Trees categorised as suitable quality and value (as categorised within BS5837 survey)
- F. Where there is an unavoidable loss of trees onsite, replacement trees will be required to be planted on site where appropriate at a rate of at least two new trees for each tree lost. Where this requirement cannot be met on site, financial contributions will be sought for offsite provision of any shortfall.
- G. Proposals for works to trees in conservation areas and those the subject of tree preservation orders will be permitted where the works are for sound arboricultural reasons and do not risk compromising the long-term health and

appearance of the tree. Proposals for work which are not in accordance with best practice (BS3998:2010 or most recent equivalent) will be refused.

- H. Proposals which would result in the loss of ancient or veteran trees, woodland or hedgerows, will not be permitted under any circumstances.
- I. Development proposals that fail to make appropriate provision for hard and soft landscaping, or fail to contribute to streetside greenery where appropriate, will be refused. Appropriate provision of hard and soft landscaping must:
  - a. Be appropriate to the character of the area;
  - b. Be well laid out in terms of access, car parking and the living conditions of future occupiers and neighbours;
  - c. Achieve a suitable visual setting for the building(s);
  - d. Provide sufficient space for new or existing trees and planting to grow and does not result in post-development pressure, and;
  - e. Support biodiversity;
  - f. Prioritise the use of native species.
- J. The Council will undertake and encourage new planting of street trees and shrubs of an appropriate size and species, secured by legal agreement if necessary, and provide, restore and/or maintain grass verges and hedgerows on public and private streets. Where new streets are proposed these should be tree-lined, and provisions for long term maintenance will be required.
- K. Proposals for the provision of hard surfacing of forecourts and front gardens will be resisted. If allowed, in part permeable materials and soft landscaping should be utilised in development proposals in line with Policy CN4.

### Supporting Text:

- 7.4.1 Harrow is largely characterised by extensive tree and shrub cover, with woodland, streetside vegetation and forecourt greenery an essential aspect of its character. The Council will seek to protect, enhance and add to these important features, increasing the borough's natural capital. The Council will seek to protect and enhance these important features.

#### *Urban Greening*

- 7.4.2 The London Plan sets an Urban Greening Factor (UGF) requirement for major developments. The UGF provides a target for the value of green cover that development is expected to provide. The Council will adhere to the recommended UGF factors for major residential and commercial development as set by the London Plan. Existing green cover retained on site as part of a development proposal will count towards the target UGF score.

- 7.4.3 Major development proposals should meet and seek to exceed the target UGF score. Consideration will be given to proposals that suitably demonstrate that

the target cannot be achieved due to technical feasibility or financial viability, in which case proposals should show that they have been designed to achieve the highest score possible. Guidance in the Urban Greening Factor SPG should be followed.

- 7.4.4 Development proposals should utilise green roofs and walls, where appropriate, ensuring that they are appropriately designed, installed and maintained. Major development proposals will be expected to demonstrate integration of green walls and roofs has been fully investigated. If the incorporation of green walls and roofs has not been pursued an explanation for this decision must be provided. Minor development proposals are strongly encouraged to incorporate green walls and roofs. All green roof and wall proposals must maximise benefits for biodiversity, sustainable drainage and cooling, complying with the latest industry standards. Design led solutions should be used to ensure that green roofs and walls do not detract from the character of the dwelling or surrounds. Incorrectly installed and maintained green walls can be a fire hazard. Best practice guidance for green walls can be found in *Fire Performance of Green Roofs and Walls*, published by the Department for Communities and Local Government. This guidance must be fully adhered to in order to mitigate any fire hazard.
- 7.4.5 Kerbside space should be used for green infrastructure where it contributes positively to the public realm (in line with policy GR3) and is not required for active travel upgrades.

#### *Trees and Landscaping*

- 7.4.6 Landscape design is integral to the design and functioning of the whole site and surrounds. The landscape and buildings need to be considered together from the start of the design process.
- 7.4.7 Design and Access statements must be supported by a robust, illustrated masterplan and a landscape strategy including management and maintenance proposals to ensure that the development is established and maintained in accordance with the design objectives, and is required for outline planning applications. A combination of hard and soft landscaped spaces should provide attractive and usable amenity areas, avoiding awkward spaces. Applicants should follow guidance from the Woodland Trust Residential developments and trees (January 2019 or updated equivalent).
- 7.4.8 The level of detail provided in the landscape plan should be commensurate with the detail provided about the building in a planning application. Planning applications are required to demonstrate that proposed landscaping and other urban greening measures will be appropriate, can be implemented effectively and will be suitably managed over the lifetime of the development. Appropriate management and maintenance programmes will be required to be implemented to protect newly planted trees.
- 7.4.9 Development proposals must ensure adequate replacement tree planting and maintenance where the retention of trees is not reasonably practical. The Council will require trees identified for retention to be protected during

construction, and to be retained or replaced where necessary following the completion of the development. In some instances, it may be more appropriate to include replacement or new tree planting as part of a development's landscaping scheme.

- 7.4.10 In wholly exceptional circumstances, where protected trees are proposed to be removed, suitable re-provision will require replacement and/or additional planting to re-provide at least equal canopy cover and/or equal environmental amenity and visual value. Where on-site re-provision cannot be provided, a financial contribution of the full cost of appropriate re-provision will be required.
- 7.4.11 Developer contributions towards trees within the public realm may be required and will be secured by a legal agreement or other relevant mechanism.
- 7.4.12 When a financial obligation is required for replacement trees the value should be calculated using the Capital Asset Value for Amenity Trees (CAVAT) or a similar suitable methodology. Financial contributions will be expected to include on-going maintenance costs for a minimum of 30 years where trees are planted in the public realm.
- 7.4.13 Financial contributions may also be sought to enhance the Harrow Green Grid and connections.

#### *Impermeable Landscaping*

- 7.4.14 Substantial areas of hard surfacing are considered to be any more than 5 square metres, as allowed for in the Town and Country Planning (General Permitted Development Order) 2015 (GPDO) (as amended) or any smaller threshold set out in subsequent GPDO.
- 7.4.15 Hard landscape surfacing should be minimised in any development or planning application to maximise the efficacy of sustainable drainage systems, mitigate flooding, enhance biodiversity and urban greening. Permeable paving and surfacing options should be utilised in development, and their permeability maintained.

## Policy GI5: Food Growing

*Linkages:*

*NPPF Chapter 15. Conserving and enhancing the natural environment*

*London Plan Policy: G8 Food growing*

### **Policy GI5: Food Growing**

- A. The Council will resist proposals that result in the loss of allotments, city farms and community gardens in order to support sustainable food growing locally, and to enhance opportunities for biodiversity, leisure, social interaction and education.
- B. The Council will support proposals to enhance, and increase provision of allotments, city farms and community gardens including necessary ancillary facilities in suitable areas, having regard to flood risk, soil quality, access to sunlight and land contamination.
- C. Major development proposals for housing and/or community facilities will be required to demonstrate they have explored options to include the provision of space and/or infrastructure for community gardening and food growing.
- D. Redevelopment proposals on sites with existing food growing assets should retain or re-provided any land and infrastructure, resulting in no net loss of provision.

### **Supporting Text:**

- 7.5.1 Allotments and community gardens form part of Harrow’s green infrastructure network. They are an important local resource for many reasons, including:
- (a) Local food production and minimisation of food miles;
  - (b) Increased biodiversity and green space;
  - (c) Fostering community through social interaction and reducing loneliness;
  - (d) Educational resources for adults and children;
  - (e) Leisure and recreation;
  - (f) Health and wellbeing.
- 7.5.2 There are currently 34 statutory allotment sites in the borough which will be protected and enhanced as valuable green infrastructure assets. The provision of additional allotment and community garden sites will be encouraged on a permanent or temporary basis on vacant or under-utilised land, or as a meanwhile use.
- 7.5.3 Allotments are particularly invaluable to those who do not have access to a private garden, helping to promote inclusivity in the community. For this reason, the inclusion of allotments and community gardens is heavily encouraged in new developments to provide residents with a meeting place to interact.

- 7.5.4 New residential and community development proposals should incorporate provision for food growing as a design-led consideration early on in the planning process. Provision should be of a high quality that meets the needs of all age groups and abilities. Ancillary facilities should also be provided in the form of water taps, storage facilities and composting bins. Additional guidance for the planning of allotments can be found in the Harrow Allotment Strategy, and the National Allotment Society's guidance for planners and developers<sup>37</sup>.

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<sup>37</sup> <https://www.nsalg.org.uk/wp-content/uploads/2023/08/NAS-Development-Brochure-2023-LR.pdf>



## **Chapter 08: Responding to the Climate and Nature Emergency**

## Strategic Policy 08: Responding to the Climate and Nature Emergency

*Linkages:*

*NPPF Chapter 14: Meeting the challenge of climate change, flooding and coastal change*

*London Plan Chapter 9: Sustainable Infrastructure*

*London Plan Policies: SI 2 Minimising greenhouse gas emissions, SI 3 Energy infrastructure*

### **Strategic Policy 08: Responding to the Climate and Nature Emergency**

A. In compliance with the Council's Climate and Nature Strategy (2023-30), all development in Harrow must be undertaken in accordance with sustainable development practices, and positively manage natural capital for the benefit of current and future generations. Development must contribute to achieving the following objectives:

#### **Clean Energy Used Efficiently**

- a. Make the fullest possible contribution to reducing greenhouse gas emissions in both the construction and operational phases of development by maximising energy efficiency and conservation measures, whilst prioritising the use of low carbon heating, renewable energy solutions and local renewable energy generation in line with Policy CN2 (Energy Infrastructure).
- b. Ensuring that all new housing is net zero carbon in line with Policy CN1 (Sustainable Design and Retrofitting).

#### **Green Mobility**

- c. Prioritise active and low carbon transport options to include walking, cycling and public transport.
- d. Reduce fossil fuel vehicle journeys, supporting necessary ongoing private vehicular travel needs by facilitating and encouraging car-sharing and electric vehicle usage.

#### **Waste-Free Economy**

- e. Minimise the embodied carbon and ecological footprint of new development by ensuring that materials are sustainably sourced, sustainable construction techniques are utilised, and waste is re-used and recycled as part of the circular economy.
- f. Through careful material selection and design, ensure developments are capable of being easily altered and adapted for future needs to ensure the fullest possible utilisation during their lifetime, and are otherwise capable of disassembly and full re-use or recycling of materials at end of life.
- g. Design developments to enable occupiers to apply the waste hierarchy during day-to-day use, and to support the growth of the circular economy by increasing re-use and recycling of materials whilst minimising residual waste.

**Healthy Places for us and Nature**

- h. Contribute to building a healthier, more resilient and thriving local natural environment that is valued by the people of Harrow. This will include:
1. Making space for Nature and increasing levels of biodiversity, the integrity of ecosystems and the borough's stock of natural capital;
  2. Where possible avoiding or otherwise minimising light and noise pollution, and improving air, water and soil quality through the adoption of appropriate best practice pollution prevention guidelines;
  3. Protecting people and places from climate impacts and risks through locally distinctive, high quality and sustainable design and multi-functional green infrastructure that increases local resilience, including to drought, overheating, storm and flooding events;
  4. Improving residents' health and wellbeing by affording greater opportunities for direct connection with the natural world locally; and
  5. Protecting and enhancing carbon storage in the local natural environment.

**Supporting Text:**

- 8.0.1 The London Borough of Harrow has declared a climate and nature emergency. This acknowledges the far-reaching ecological impacts of human-induced climate change. This declaration recognises that a changing climate will have severe and enduring social, economic, and environmental implications.
- 8.0.2 In response to the above, the Council has produced a Climate and Nature Strategy 2023-30. This establishes a framework of key actions which the Council, local communities and other stakeholders can prioritise to significantly reduce greenhouse gas emissions in the period to 2030, support the recovery of the natural world and increase local resilience to the impacts of climate change. These measures are reflected in the policies contained within this Local Plan.
- 8.0.3 In accordance with the NPPF (Paragraph 158) (2023), 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'
- 8.0.4 The London Plan sets a strategic objective and framework for London to become a net zero-carbon city by 2050. The plan provides an overarching set of aims for mitigation and adaptation to climate change across London.

- 8.0.5 The Harrow Climate and Nature Strategy 2023-2030 highlights four action areas illustrated in the policy above, and identifies climate change as ‘The destabilisation of our climate by the burning of fossil fuels, and the associated weakening and depletion of ecosystems on our planet caused by human activity’.
- 8.0.6 Locally significant changes will need to be made to the way the borough grows as we attempt to limit global warming and adapt to a changing environment. The Local Plan and the Climate and Nature Strategy will be the foundation of the Borough’s response to the climate and nature emergency.
- 8.0.7 Similarly, the draft Harrow Long Term Transport Strategy has ‘greener travel options’ as an ambition and promotes net zero carbon, modal shift to sustainable transport options (public transport, walking and cycling) and electric vehicle (EV) charging points.
- 8.0.8 As an intrinsic part of the wider environment, the historic environment is also under threat, but it can also be part of the solution. In the same way that nature-based solutions can address climate change, heritage-based solutions can also play a positive role in addressing both the nature and climate emergencies.
- 8.0.9 The Habitats Regulations Assessment (HRA) identified Likely Significant Effects (LSEs) in relation to air quality and water quality, with these risks relating to the quantum of development proposed in this Plan. As the Plan must be in general conformity with the London Plan with respect to the quantum of development proposed, the plan mitigates the identified risk through the adoption of appropriate best practice pollution prevention guidelines.

## Policy CN1: Sustainable Design and Retrofitting

Linkages:

NPPF Chapter 2. Achieving sustainable development

London Plan Policy GG6 Increasing efficiency and resilience

London Plan Policy SI 2 Minimising greenhouse gas emissions

### Policy CN1: Sustainable Design and Retrofitting

#### New Buildings

- A. All new buildings should be designed and built to be Net Zero Carbon in operation. They should be ultra-low energy buildings, utilise low carbon heat with no gas connection, contribute to the generation of renewable energy on-site, and be constructed with low levels of embodied carbon.
- B. All new buildings must minimise the use of mains water achieving a maximum consumption of 105 litres per head per day, excluding allowance of up to five litres for external water consumption.
- C. All new buildings should meet the following standards:

#### Space Heating Demand

- a. All dwellings should achieve a space heating demand of less than 15 kWh/m<sup>2</sup> GIA/yr; and
- b. All non-domestic buildings should achieve a space heating demand of less than 15 kWh/m<sup>2</sup> GIA/yr;

#### Energy Use Intensity (EUI)

- c. Domestic buildings - All dwellings should achieve an Energy Use Intensity (EUI) of no more than 35 kWh/m<sup>2</sup>GIA/yr;
- d. Non-domestic buildings - Non-domestic buildings should achieve an Energy Use Intensity (EUI) of no more than the following (where technically feasible) by building type or nearest equivalent:

Building Typology	EUI Standard
Student or keyworker accommodation, care homes, extra care homes	35 kWh/m <sup>2</sup> GIA/yr
Warehouses and light industrial units	35 kWh/m <sup>2</sup> GIA/yr
Schools	65 kWh/m <sup>2</sup> GIA/yr
Offices, Retail, HE Teaching facilities, GP surgeries	70 kWh/m <sup>2</sup> GIA/yr
Hotels	160 kWh/m <sup>2</sup> GIA/yr

**Offsetting (as last resort)**

- e. Offsetting will only be accepted as a means to achieving planning policy compliance as a last resort if the building is compliant with all other Net Zero Carbon building aspects. In these circumstances, the applicant should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use Intensity in kWh. The applicant should pay into the Council's offset fund a sum of money equivalent to the shortfall; this contribution will be secured by way of a planning obligation.

**Retrofit of Existing Buildings**

- D. The use of sustainable conversion and retrofitting measures will be encouraged and supported to improve the energy efficiency of buildings, as well as the quality of living for their occupants. Retrofitting measures should consider how the building has been constructed, its context, and energy use.
- E. Development proposals for major residential domestic refurbishment must achieve a certified 'Excellent' rating under the BREEAM Domestic Refurbishment 2014 scheme<sup>38</sup>, or future equivalent, unless it can be demonstrated that it is not feasible.
- F. Development proposals for major non-residential refurbishment, including mixed-use development, will be required to achieve a certified 'Excellent' rating under the BREEAM Non-Domestic Refurbishment scheme, or future equivalent, unless it can be demonstrated that it is not feasible.
- G. Development proposals for the refurbishment or retrofit of all buildings should achieve a certified 'Excellent' rating for 'Wat01' or future equivalent, unless it can be demonstrated that it is not feasible.
- H. Proposals for retrofit of existing buildings must consider impacts on the historic environment, and amenity of the building's users and neighbours. Historic England guidelines should be considered when retrofitting older buildings.

**Supporting Text:**

- 8.1.1 In accordance with the NPPF, 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures'. The Central government, Greater London Assembly (GLA) and the London Borough of Harrow have each declared a climate emergency and committed to minimising greenhouse gas emissions.

<sup>38</sup> ([https://tools.breeam.com/filelibrary/BREEAM%20Refurb/KN4613\\_-\\_BREEAM\\_Domestic\\_Refurbishment.pdf](https://tools.breeam.com/filelibrary/BREEAM%20Refurb/KN4613_-_BREEAM_Domestic_Refurbishment.pdf))

- 8.1.2 In 2022, the residential sector emitted approximately 17% of all carbon emissions in the UK<sup>39</sup>. The age of a property is the single biggest factor in the energy efficiency of homes, according to the ONS<sup>40</sup>. This highlights that new homes, and other buildings, are significantly more energy efficient than older building stock, which requires retrofitting to bring them up to appropriate Energy Performance Certificate (EPC) ratings of 'C'. EPCs are required for all buildings when constructed, sold, or rented.
- 8.1.3 To achieve the Council's carbon reduction aspirations by 2030 all new buildings in Harrow are required to be Net Zero Carbon. Exceptions to this rule exist for residential annexes and extensions, outbuildings, storage buildings, structures that are not buildings (i.e pylons, plant machinery etc.). Minor developments can simplify the process through the use of pro-forma reports to reduce the pre-planning costs associated with predictive energy modelling.
- 8.1.4 Net Zero Carbon is defined by the London Energy Transformation Initiative (LETI) as 'A building which operates at net-zero carbon does not burn fossil fuels, has ultra-high energy efficiency and is 100% powered by renewable energy<sup>41</sup>'. Extensive retrofitting of existing building stock will be required to achieve this efficiency, and future proofing of buildings will be required to ensure future works are easily facilitated. Constructing new buildings to be low-carbon from the outset is significantly cheaper than retrofitting and typically delivers more effective outcomes.
- 8.1.5 High standards of sustainable design are expected of all developments, including new development, retrofit, conversion and refurbishments. All development should aim to make effective use of resources and materials, future proofing for increased efficiency and reuse of materials where possible. Sustainability, including water efficiency and embodied carbon in buildings, should be considered early in the design process in order to maximise energy and carbon savings, and minimise construction and operational costs.
- 8.1.6 All buildings in England must comply with Part L 2021 of the Building Regulations. They set a minimum level of performance. However, there is currently a significant gap between these buildings standards and the standards required to genuinely become net zero. The average Energy Use Intensity (EUI) required to achieve a net zero carbon balance across UK housing stock is 35 kWh/m<sup>2</sup>/yr, which is significantly lower than the average that current building standards deliver.
- 8.1.7 The London Plan imposes higher standards for net zero development; however, it does not fully deliver net zero according to the LETI definition. The London Plan policy does not take unregulated emissions into account, allows

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([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/114737/2/2022\\_Provisional\\_emissions\\_statistics\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/114737/2/2022_Provisional_emissions_statistics_report.pdf)).

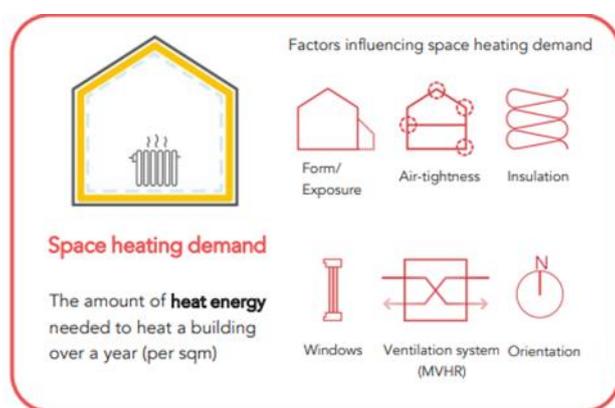
<sup>40</sup> (<https://www.ons.gov.uk/economy/environmentalaccounts/articles/climatechangeinsightsuk/august2022>)

<sup>41</sup> <https://www.levittbernstein.co.uk/site/assets/files/3494/leti-climate-emergency-design-guide.pdf>

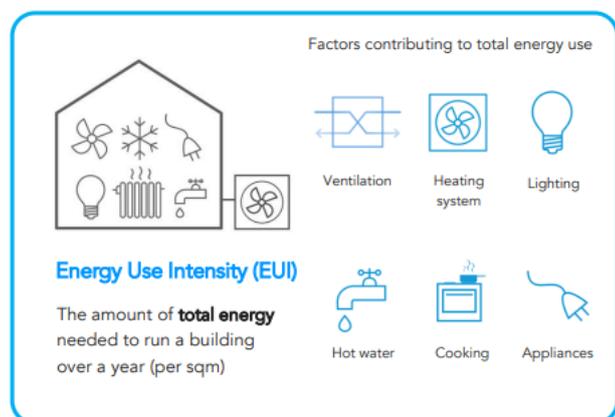
for up to 65% of regulated emissions to be offset, and only applies to major development schemes.

8.1.8 To fully achieve net zero development and ensure climate change resilience, Harrow has set the standards in the policy above considering regulated and unregulated energy use. These are measured through Space Heating Demand and Energy Use Intensity (EUI). The evidence base for this work (Delivering Net Zero 2023) was undertaken in collaboration with 18 London boroughs, all of whom are seeking to achieve net zero development.

8.1.9 Space Heating Demand refers to the amount of heat energy needed to heat a building over the course of a year per square metre. Various design and specification decisions affect space heating demand including building form and orientation, insulation, airtightness, windows and doors and the type of ventilation system.



8.1.10 Energy Use Intensity (EUI) represents the total amount of energy used by a building divided by its floor area (GIA) and is reported in kWh/m<sup>2</sup> year. The EUI is a good indicator of the energy efficiency of a home/building and can be calculated at both the design stage and post completion. For buildings heated by an individual heating system, performance monitoring will be simple as it will be the annual ‘energy at the meter’ divided by the floor area.



8.1.11 Developments should be connected to a low or zero carbon district heating network where possible, in accordance with Policy CN2 (Energy Infrastructure).

- 8.1.12 On-site renewable energy generation will be required in most instances for buildings to be net-zero. There is a preference for low lying roof mounted solar PV, although other forms of generation may be appropriate. Where the use of on-site renewable energy generation to match total energy consumption is not technically feasible or economically viable, renewable energy generation should be maximised as much as possible. Where this is not possible, a contribution to the Harrow carbon offset fund will be required.
- 8.1.13 Viability testing has shown that in Harrow, the relatively modest increase in construction costs for development to achieve net-zero carbon through on-site solutions (in line with the evidence base) may impact on development viability where schemes are already at the margins of viability. This may result in a reduction in affordable housing delivery in these schemes. However, it can be reasonably expected that costs will fall as more developers integrate low carbon technologies into their developments in response to changes in the requirements of local and national policy.
- 8.1.14 Developments should be designed to reduce the extent of heat loss by reducing the number of junctions and optimising elevation design to create passive energy efficiency, as well as optimising orientation and utilising dual aspects. Passivhaus principles should be followed in the design stages of a development, and where possible in retrofitting existing buildings.
- 8.1.15 Buildings must also comply with the additional requirements of the Building Regulations Part L 2021, including Fabric Energy Efficiency criterion for domestic buildings and Primary Energy criterion for all buildings and demonstrate compliance at planning stage.
- 8.1.16 The Council recognises that there may be some rare circumstances where site or building constraints make fully complying with this policy difficult i.e. retrofit of a heritage asset. In these circumstances, the applicant must demonstrate that they have pursued all reasonable and viable routes to compliance with the policy to the Council's satisfaction.

#### *Offsetting*

- 8.1.17 Offsetting will only be allowed where the following conditions are met:
- (a) The proposed building must not use fossil fuels on-site.
  - (b) It must have a level of space heating demand and energy use intensity (EUI) compliant with levels set in the Local Plan.
  - (c) On-site renewable energy generation (e.g. through PVs) has been maximised and achieves at least 80 kWh/m<sup>2</sup> building footprint for all building types (and 120 kWh/m<sup>2</sup> building footprint for industrial buildings).
- 8.1.18 Harrow is facing higher costs for offsetting development carbon emissions than the London Plan charge, in common with other councils. This is likely to have greater impacts on development viability than those created by on-site

net-zero carbon solutions. This increases the economic incentive for developers to use on-site solutions rather than offsetting.

- 8.1.19 Development should seek to minimise predicted energy and maximise PV (or other acceptable renewable energy) generation on site. Once officers are satisfied that the building complies with the policy requirements above, energy offsetting may be used to deal with the shortfall between EUI and on-site renewable energy generation. Applicants must work out the difference between the development's EUI and how much renewable energy it will generate. Any shortfall of renewable energy generation will lead to an energy offset payment to the council, this cost is based on the basis of the cost of solar PVs. The evidence base has set the energy offset price at **£1.32/kWh/yr**, this price will be reviewed as necessary.
- 8.1.20 All new development must promote improvements to water supply infrastructure and improve the security of water supply in line with London Plan Policy S15 B. Developments must demonstrate that there is adequate water supply infrastructure. Where capacity for the proposed development is lacking, the applicant/developer and Affinity Water must identify and plan for mitigations or improvements prior to commencement of construction.

## Policy CN2: Energy Infrastructure

*Linkages:*

*NPPF Chapter 14: Meeting the challenge of climate change, flooding and coastal change*

*London Plan Policy: SI 3 Energy Infrastructure*

### **Policy CN2: Energy Infrastructure**

- A. Development proposals must be designed in response to a site-specific assessment of the most effective and efficient energy supply options that are capable of delivering net zero operational carbon, taking into account any local energy master plans where applicable.
- B. Major development proposals must adhere to London Plan requirements with regard to communal low-temperature heating systems, heating hierarchy and future connections to heat networks (London Plan Policy SI3 Energy Infrastructure, parts D and E).
- C. Major development must, and minor development should, maximise onsite renewable energy generation through the provision of rooftop solar photovoltaic (PV) panels, or other suitable renewable energy generation method.
- D. Where car parking is proposed in a development, electric vehicle charging infrastructure must be provided in line with the Harrow Electric Vehicle Strategy, and Policy M3 (Parking).
- E. The council will support standalone renewable energy infrastructure where it meets all other relevant aspects of this Local Plan.

### **Supporting text:**

- 8.2.1 London currently sources 95% of its energy from outside the GLA boundary. In order to meet the GLA, and Harrow's zero-carbon targets, significant changes are required to the way electricity is generated and used. The West London electricity grid is under pressure from development, a growing population and a high concentration of data centres. There is growing pressure to adopt and deliver on net-zero targets in line with the Mayor of London's Accelerated Green Pathway, which aims for rapid and mass electrification of heating and transport across London.
- 8.2.2 The identification of suitable areas for renewable and low carbon energy sources is supported by this Local Plan and the Council's Climate and Nature Strategy ('Living Harrow'). The Council will support appropriate community-led initiatives for renewable and low carbon energy, and plan for ongoing reinforcement of the power grid with localised renewable and low carbon energy, in line with Paragraph 160 and 161 of the NPPF (2023)
- 8.2.3 Development must deliver electricity through local, clean and low-carbon sources, shifting away from fossil fuels and utilising a diverse range of heat sources and localised electricity generation options. This will ensure that

Harrow becomes more self sufficient and resilient with regard to its energy generation, distribution and usage.

- 8.2.4 To achieve this, major development proposals must engage at an early stage with relevant energy suppliers and bodies to establish future energy and infrastructure requirements to support the development. Minor development proposals must investigate the feasibility of incorporating on-site energy generation and low carbon heating options such as heat networks and heat pumps.
- 8.2.5 The West London Local Area Energy Plan (WLLAEP) provides context surrounding the current and future energy infrastructure and requirements of nine West London boroughs. The Plan aims to support a change in the energy efficiency of buildings and identify constraints and risks in energy transition, while planning for sustainable reinforcement of the grid. The plan and associated mapping should be a consideration in development across the borough as it relates to energy infrastructure, supply and demand.

#### *Heat Networks*

- 8.2.6 Development proposals should prioritise connections to district heat networks where possible. The London Plan identifies Heat Network Priority Areas that identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers.
- 8.2.7 Within Harrow and reflecting the spatial strategy of this Local Plan, the Harrow and Wealdstone Opportunity Area is considered to have greater potential for district heat networks, given the quantum of development, its density, existence of communal heat networks capable of connection in the future, and a number of large development sites being in Council / public ownership.
- 8.2.8 Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system. The heat source must be selected in accordance with the London Plan heating hierarchy (see Policy SI3 Energy Infrastructure).
- 8.2.9 Where developments are proposed within Heat Network Priority Areas but are beyond existing heat networks, the heating system should be designed to facilitate cost-effective future connection. This may include, allocating space in plant rooms for heat exchangers and thermal stores, safeguarding suitable routes for pipework from the site boundary and making provision for connections to the future network at the site boundary.

*Onsite Renewable Energy Generation*

- 8.2.10 Development proposals should maximise the amount of renewable and secondary energy generated on site. This includes the use of solar photovoltaics (PV), heat pumps and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind based renewable energy in some locations. Innovative low-and zero-carbon technologies will be supported. Rooftop PV panels should be low-lying and visually unobtrusive where possible, particularly in Conservation Areas.

## Policy CN3: Reducing Flood Risk

*Linkages:*

*NPPF Chapter 14: Meeting the challenge of climate change, flooding and coastal change*

*London Plan Policy SI12 Flood Risk Management*

### **Policy CN3: Reducing Flood Risk**

- A. Proposals will be required to apply the sequential and exceptions test (where necessary) in line with National Policy.
- B. Proposals that require a Flood Risk Assessment (FRA), in line with National Policy must demonstrate that the development will be resistant and resilient to all relevant sources of flooding including surface water. The design and layout of proposals requiring a FRA must:
  - a. Minimise the risk of flooding on site and not increase the risk of flooding elsewhere;
  - b. Wherever possible, reduce flood risk overall;
  - c. Ensure a dry means of escape for occupiers of the development; and
  - d. Achieve appropriate finished floor levels which, for residential development in flood zone 3 (subject to sequential and exceptions tests), must be at least 300mm above the modelled 1 in 100 year plus climate change flood level; and
  - e. flood resilience measures must be fitted to 0.5m above finished floor level.
- C. Proposals that would fail to make appropriate provision for flood risk reduction and mitigation, or which would increase the risk or consequences of flooding, will be refused.
- D. Sites that are mapped as falling within ‘Developed’ Flood Zone 3b will be treated as having a high probability of flood risk, for the purposes of applying the sequential and (where necessary) exception tests, provided that the development would be safe and would not increase the risk or severity of flooding elsewhere, opportunities will be sought from the redevelopment of sites in ‘Developed’ Flood Zone 3b to restore the natural function and storage capacity of the floodplain.
- E. Sites that are mapped within ‘Greenfield’ Flood Zone 3b will be treated as functional floodplain for the purposes of applying the sequential and exception (where necessary) tests. Proposals that involve the loss of undeveloped floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be refused.
- F. Basement development will not be allowed on sites within Flood Zone 3b. Outside of these areas, development that involves the formation of new basements, or the change of use of existing basements, must have regard to flood risk and ensure that it is specifically addressed through the Flood Risk Assessment. The installation of resilience measures to basements will be required. Proposals for the formation of new dwellings or additional habitable accommodation within basements will be refused.
- G. Natural flood management methods should be employed in development proposals.

### Supporting Text:

- 8.3.1 The National Planning Policy Framework demonstrates the Government's commitment to pro-active management of development in relation to flood risk, and to planning for climate change impacts. It also tasks the planning system with preventing new and existing development from contributing to, or being put at unacceptable risk from, environmental water pollution and the remediation of historic pollution where appropriate.
- 8.3.2 The London boroughs are Lead Local Flood Authorities (LLFAs) and are responsible for local surface water flood risk management and for maintaining a flood risk management assets register. LLFAs are required to produce Flood Risk Management Strategies.
- 8.3.3 The policies in this chapter respond to the Borough's evidence base, in particular Harrow's Strategic Flood Risk Assessment, Local Flood Risk Management Plan and Strategy, and Surface Water Management Plan. A Hydrological Catchment Strategy is proposed to replace the Surface Water Management Plan 2012 and the Local Flood Risk Management Strategy 2016. This would replace the mapped critical drainage areas with hydrological catchment areas.
- 8.3.4 Local Authorities are required to meet flood risk mitigation requirements whilst facilitating development needs. Where criterion B (d) of the policy applies, applicants and architects are required to ensure accessibility issues relating to elevated finished floor levels are adequately addressed through a design led approach. Applicants should consult the most recent flood mapping to determine whether a site is at risk of flooding (<https://flood-map-for-planning.service.gov.uk/>). Applicants and planners should consult the Environment Agency's website for guidance regarding preparing for flood risk management.
- 8.3.5 The NPPF and accompanying PPG state that a sequential, risk-based approach to the location of development should be applied, with the aim of avoiding possible flood risk to people and property and taking the impacts of climate change into account. This is reinforced by London Plan Policy SI12.
- 8.3.6 The West London Strategic Flood Risk Assessment (SFRA)<sup>42</sup> has identified in broad terms areas that are liable to flooding from rivers and ordinary watercourses within the catchments of the Rivers Brent, Colne and Crane, and the associated probability of flooding. It also identifies areas subject to surface water flooding. The strategic assessment informs spatial planning in the Borough and form a principal component of the evidence base that underpins planning policies and site allocations. Applicants should consider the findings of the SFRA when undertaking a site specific SFRA (where necessary) and ensure the requirements of the sequential and exception test are met.
- 8.3.7 In urban areas surface water is an additional source of flood risk. Rainwater falling onto impermeable surfaces such as buildings and hard surfaces has

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<sup>42</sup> <https://westlondonsfra.london>

traditionally been disposed of via Harrow's surface water drainage network. Incremental urbanisation of the Borough and finite drainage network capacity has increased surface water flooding in recent years. Harrow's Surface Water Management Plan (2012) identifies 15 critical drainage areas which extend over most of the borough and are susceptible to flooding from surface water and other sources.

- 8.3.8 Harrow's Local Flood Risk Management Strategy (2016) outlines the priorities for local flood risk management, assesses risk, provides a delivery Action Plan, and identifies roles and responsibilities of authorities.
- 8.3.9 The Harrow Infrastructure Delivery Plan has identified existing and planned flood alleviation schemes. These schemes aim to mitigate both identified and predicted flood risks, while considering the cumulative impact of development.
- 8.3.10 Harrow will work with the West London LPA and Strategic Flood Group to adopt a catchment based approach to flood alleviation, and the collection and use of developer contributions to fund mitigation measures.
- 8.3.11 Proposed site allocations for development have been subjected to sequential and exception tests where necessary as part of the Local Plan process (refer to Chapter 11).
- 8.3.12 Some of the Borough's open spaces contain river corridors and form a part of the functional flood plain. The modelled flood extents illustrated on Harrow's flood maps represent the best available information about the strategic risk of flooding. Consideration must be given to areas within the functional floodplain, which represent the most frequent and serious risk of flooding. The NPPF requires Local Plans to identify Flood Zones (3b). Harrow has made a distinction between Greenfield Zone 3b (undeveloped) and Developed Zone 3b (previously developed i.e a town centre). Undeveloped floodplain, defined as Flood Zone 3b within areas designated as Green Belt, Metropolitan Open Land or open space on the Policies Map, is of particularly high value within the urban context. It provides unimpeded space where water is able to flow or be stored during times of flood. However, much of the Borough is already urbanised with many rivers culverted, changing their behaviour in response to rainfall and flooding. Previously developed land within the floodplain, defined as Developed Flood Zone 3b on land not designated as Green Belt, Metropolitan Open Land or open space on the Policies Map, provides opportunity through development to realise flood risk management and reduction objectives outlined in this policy.
- 8.3.13 All Flood Zone 3b land represents land where water has to flow or be stored in times of flood, therefore it remains essential that development in this zone is designed to be safe and does not displace flood risk to land elsewhere in the borough.

## Policy CN4: Sustainable Drainage

*Linkages:*

*NPPF Chapter 14: Meeting the challenge of climate change, flooding and coastal change*

*London Plan Policy SI13 Sustainable Drainage*

### **Policy CN4: Sustainable Drainage**

- A. All development is required to reduce the risk of surface water flooding, through separation of foul and surface water flows.
- B. Development must incorporate Sustainable Urban Drainage Systems (SuDS) where necessary to control discharge rates to reduce surface and storm water run-off. Rainwater should be utilised as a resource where feasible through rainwater harvesting and blue roofs. Greenfield run off rates must be achieved.
- C. The drainage hierarchy identified in London Plan Policy SI13 (Sustainable Drainage) should be applied to all development.
- D. The design and layout of major development proposals will be required to:
  - a. Maximise the use of Sustainable Urban Drainage Systems to control the rate and volume of surface water run-off, and follow the London Plan Drainage Hierarchy (Policy SI13);
  - b. Ensure separation of surface and foul water systems;
  - c. Make reasonable provision for the safe storage and passage of flood water in excessive events; and
  - d. Ensure adequate arrangements are in place to secure the long-term responsibility for the management and maintenance of on-site infrastructure;
- E. Proposals for minor developments, householder development, and conversions should make use of sustainable drainage measures wherever feasible and must ensure separation of surface and foul water systems.
- F. There is a presumption against impermeable hard standing on residential gardens and public open space. No impermeable hard standing will be permitted if it fails to control and reduce surface water runoff.
- G. Proposals that would fail to make adequate provision for the control and reduction of surface water runoff will be refused.
- H. Proposals for major development should ensure appropriate best practice is followed with respect to the control of water pollution.

### **Supporting Text:**

- 8.4.1 Ongoing population growth and development has increased pressure on drainage infrastructure. To alleviate this pressure, development needs to utilise sustainable drainage methods. Increased development and hard surfacing has resulted in additional incidents of overland flows and flooding due to insufficient natural drainage.

- 8.4.2 Harrow, in partnership with the North-West London Strategic Flood Group will work with providers to identify and undertake work to design and install strategic flood storage and attenuation drainage solutions.
- 8.4.3 Drainage should be designed and implemented in a partnership manner that promotes multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation. The London Sustainable Drainage Action Plan addresses and promotes the awareness and retrofitting, of sustainable drainage systems across London, and should be followed as an example of good practice.
- 8.4.4 Approaches to surface water management that consider flooding, pollution, biodiversity and amenity are referred to as Sustainable Drainage Systems (SuDS). SuDS systems are generally considered the best practice approach to surface water management as they provide flow on effects and replicate natural water catchments and storage systems. SuDS measures aim to manage surface water runoff as close to the source as possible. A strong preference is given to green over grey drainage features. Developments should follow the sustainable drainage hierarchy identified in London Plan Policy SI13 (Sustainable Drainage).
- 8.4.5 The London Sustainable Drainage Proforma sets the standard for information required in a Sustainable Drainage Strategy and must be utilised by applicants to avoid delays in the planning process.
- 8.4.6 Thames Water has raised concerns around drainage and sewer network capacity across several proposed development sites identified in their Drainage and Wastewater Management Plan (Drainage and Wastewater Management Plan | Thames Water). For major applications, a Surface Water Drainage Strategy will need to be produced by developers in liaison with Thames Water Development Services. This is to include a detailed model of the network capacity to determine if mitigation is required. It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding. The Drainage Strategy is required to ensure any appropriate mitigation, including network upgrades, are undertaken ahead of occupation of the development, and should detail:
- (a) Pre and post development runoff rates and water quality impacts, ensuring run-off is clean and safe; and
  - (b) Ownership, management and maintenance plan arrangements of any Sustainable Urban Drainage System features.
- 8.4.7 Surface water drainage system discharge rates should be restricted to the equivalent Greenfield  $Q_{bar}$  runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha), in line with CIRIA guidance.
- 8.4.8 All development must separate foul and surface water flows where relevant and proportionate, having regard to the extent of changes to

drainage/sewerage arrangements and the level increase in demand placed on the drainage/sewerage network as a result of the development. The Council's pre-application service should be used to determine the specific requirements for a proposal. It should be noted that in all cases development will also need to comply with the separate requirements of the Building Regulations (Approved Document H: 2015) in relation to the treatment of foul and surface water.

- 8.4.9 Where greenfield runoff rates cannot be achieved this should be clearly justified by the applicant. The fact that a site is previously developed and has an existing high run-off rate will not constitute justification.
- 8.4.10 New hardstanding should be made from permeable materials. Development proposals will be expected to utilise permeable surfacing and include an ownership, management and maintenance plan as part of any planning application. The collection of water through tanks is encouraged as it creates resilience to drought and flooding.
- 8.4.11 Development must protect groundwater from contamination by following guidance from the Environment Agency. In some instances, developers may be required to submit a preliminary risk assessment at application stage where there is any potential land contamination.
- 8.4.12 Major developments must follow appropriate best practice pollution prevention guidelines; these include adherence with the following Construction Industry Research and Information Association (CIRIA) guidance documents to manage construction run-off: CIRIA C532 (2001) - Control of water pollution from construction sites. Guidance for consultants and contractors; CIRIA C648 (2006) – Control of Water Pollution from Linear Construction Projects; and CIRIA C741 (2015) – Environmental Good Practice on site. 4th Edition. Additionally, the incorporation and management of interceptors (e.g. SuDS) into development schemes to trap the silt, oil and other possible contaminants in run-off to prevent pollution and degradation of the downstream habitats should be designed in accordance with current best practice, including adherence to CIRIA C753 (2015), the SuDS Manual and the Design Manual for Roads and Bridges (DMRB) Volume 11 Section 3 Part 10 HD 45/09 Road Drainage and the Water Environment.

**Flood Alleviation and Biodiversity improvements, Headstone Manor Park**



## Policy CN5: Waterway Management

*Linkages:*

*NPPF Chapter 14: Meeting the challenge of climate change, flooding and coastal change*

*London Plan Policy SI14 Waterways (Strategic role)*

*London Plan Policy SI16 Waterways (Use and Enjoyment)*

*London Plan Policy SI17 Protecting and enhancing London's waterways*

### **Policy CN5: Waterway Management**

- A. Development proposals should seek to maximise the multifunctional social, economic and environmental benefits of rivers and waterways.
- B. The design and layout of development on sites where there is a main river or ordinary watercourse within, adjacent to or abutting the site boundary will be required to maintain an undeveloped buffer zone of 8 metres either side of a main river (from the top of the riverbank/flood defence/culvert), 5 metres either side of an ordinary watercourse, or an appropriate width as may be agreed by the Environment Agency or Council LLFA.
- C. Applications for major development on sites containing a main river or ordinary watercourse within the site boundary will be required to:
- E. Have regard to the relevant provisions of the Thames River Basin Flood Risk Management Plan<sup>43</sup>;
  - a. Investigate and, where necessary, secure the implementation of environmental enhancements to open sections of river or watercourse; and
  - b. Investigate and, where feasible, secure the implementation of a scheme for restoring culverted sections of river or watercourse which must include an adequate buffer for flooding and maintenance purposes.
- D. Where on-site enhancements or deculverting are financially viable but not feasible, the Council will seek a financial contribution towards relevant other projects for the enhancement or deculverting of other sections of the river or watercourse.
- E. Proposals that would adversely affect the infrastructure of main rivers and ordinary watercourses, or which would fail to secure feasible enhancements or deculverting, will be refused.

### **Supporting Text:**

8.5.1 Watercourses in Harrow form part of the complex network of rivers and streams within the London basin that drain to the River Thames. Most of the watercourses in Harrow originate within the Borough, reflecting Harrow's location at the upper reaches of the natural drainage system in London, and

<sup>43</sup> (Thames River Basin District Flood Risk Management Plan 2021 to 2027 (publishing.service.gov.uk))

form part of catchments for three of the principal tributary rivers to the Thames: the Brent, the Colne and the Crane. Of the total 93.39 km length of water courses that run through Harrow, 39.65km (just under 43%) is culverted. Today, watercourses are valued as an important resource both for biodiversity and for sustainable flood management. As previously developed sites come forward for redevelopment, these offer the opportunity to maintain and enhance the natural functioning of the watercourse, or where culverted, to restore the watercourse back to a more natural state. All water courses should aim to have a minimum of ‘good’ status under the Water Framework Directive (<https://www.legislation.gov.uk/ukxi/2017/407/contents/made>).

- 8.5.2 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 aims to improve the condition inter alia of surface waters including rivers and lakes having regard to biological, physical and chemical qualities. To contribute to the objectives of the Directive any activities or developments within an area of river, watercourse or water body must not cause deterioration and should enhance the condition of the river, watercourse or water body. Specifically, activities and developments should promote sustainable water use, reduce pollution and achieve ‘good ecological status or potential’. The Council seeks to reinforce the Thames River Basin Management Plan seeks to ensure that there is no deterioration in the ecological status of any WFD waterbody or associated elements caused by development in the borough. The Borough’s network of main rivers and ordinary watercourses are mapped in the West London Strategic Flood Risk Assessment (2018 Live).
- 8.5.3 The London Plan (2021) highlights the strategic role of waterways and their multifunctional benefits. As London’s waterways cross boundaries, it is important to take an area catchment-based approach to waterway management and work closely with other West London Boroughs to ensure a cohesive and multi-beneficial approach.



## **Chapter 09: Managing Waste and Supporting the Circular Economy**

## Strategic Policy 09: Managing Waste and Supporting the Circular Economy

*Linkages:*

*NPPF Chapter*

*London Plan Policy SI7 Managing waste and supporting the circular economy*

*London Plan Policy SI8 Waste capacity and net-waste self sufficiency*

*London Plan Policy SI9 Safeguarded waste sites*

### **Strategic Policy 09: Managing Waste and Supporting the Circular Economy**

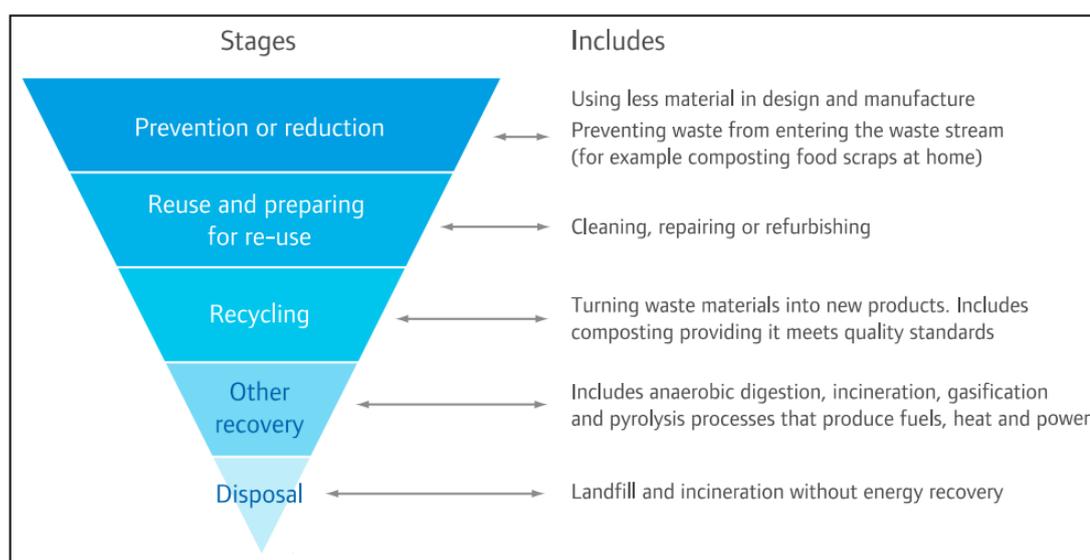
- A. The Council supports sustainable waste management and will:
- a. Aim to reduce the amount of waste produced in the Borough and promote waste self-sufficiency in line with London Plan policy SI8;
  - b. Promote waste as a resource and encourage the increased re-use of materials and recycling in line with Circular Economy principles and London Plan policy SI7;
  - c. Require all new Major development to address waste management at all stages of a development's life from the design and construction stages through to the end use and activity on site. This will ensure all waste is managed towards the upper end of the waste hierarchy;
  - d. Safeguard existing waste sites in line with the West London Waste Plan 2015 or any subsequent documents;
  - e. Require the provision of additional compensatory land with equal or greater waste management capacity, to replace any loss of a waste management site; and
  - f. Work in conjunction with its partners in West London, to identify and allocate suitable new sites for waste management facilities within any replacement to the West London Waste Plan, to provide sufficient capacity to meet the apportionment requirements of the London Plan.
- B. Development proposals for new waste management sites will be assessed using the West London Waste Management Plan, and the London Plan, including impacts of the proposal on the local environment and residential amenity.
- C. Proposals for new waste management facilities, extensions and alterations should be appropriately designed and contribute positively to local character.

### **Supporting Text:**

- 9.0.1 As the population of Harrow increases, so does its waste collection and management requirements. The London Plan states that waste must be managed sustainably through the minimisation of waste, and the safeguarding and optimisation of waste management sites.

- 9.0.2 In partnership with the West London Waste Authority, Harrow has collaborated with neighbouring local authorities to proactively plan for our future waste infrastructure needs in line with the West London Waste Strategy and the West London Waste Plan. The strategy is renewed every three years with the shared vision of reducing reliance on landfill and working towards being net self-sufficient. It is proposed that the West London Waste Plan is updated to reflect the new requirements and waste apportionments in the London Plan 2021.
- 9.0.3 The strategy identifies current capacity, waste management sites for protection and enhancement, and anticipated future demand. Both the strategy and the Waste Plan should be referred to when developing plans for any waste management site.

**Waste hierarchy**



Source: West London Waste Plan (2015)

## Policy CE1: Reducing and Managing Waste

*Linkages:*

*NPPF Chapter*

*London Plan Policy SI7 Reducing waste and supporting the circular economy*

*London Plan Policy SI8 Waste capacity and net-waste self sufficiency*

### **Policy CE1: Reducing and Managing Waste**

- A. All proposals (excluding Householder applications) will be required to make on-site provision for general waste, the separation of recyclable materials and the collection of organic material for composting. On-site provision must:
  - a. Ensure there is adequate space for temporary storage of waste generated by that site allowing for the separate storage of recyclable materials pending collection;
  - b. Utilise bins that are compliant with the council's specifications for weight, durability and size, and compliant with British Standards Institution (BSI);
  - c. Ensure safe access for collectors and, where relevant, collection vehicles; and
  - d. Be located and screened to mitigate amenity impacts (odour, vermin, noise) to occupiers and adverse visual impact.
- B. All proposals for major development should promote circular economy outcomes and aim to be net zero-waste. Applications should include a circular economy statement in accordance with London Plan policy SI 7.
- C. Residential development proposals for new dwellings and conversions should adhere to the guidance in the council's waste management standards, and ensure that:

#### *Flatted development*

- a. There is adequate space within each flat/apartment for the temporary storage of waste generated by the dwelling, allowing for the separate storage of recyclable materials;
- b. There is adequate accessible communal storage for waste, including separate recyclables pending its collection;
- c. Storage and collection systems (e.g. dedicated rooms, storage areas, chutes or underground waste collection systems) for waste are of high-quality design and enable adequate, convenient access for all residents and waste collection operatives;
- d. Measures are incorporated to manage amenity impacts to acceptable levels, including odour, noise, vermin and dust;
- e. The on-site treatment of waste has been considered and any system to be incorporated will take into account of the factors listed above; and
- f. Adequate contingency measures are in place to manage any breakdowns of any mechanical equipment that may be required for the movement and storage of waste.

*Other residential development*

- g. There is adequate space within each dwelling for the temporary storage of waste generated, allowing for the separate storage of recyclable materials; and
  - h. There is adequate external storage space for waste, including separate recyclables, pending its collection.
- D. Proposals for all types of new development (excluding Householder applications) should be accompanied by a recycling and waste management strategy that considers the above matters and demonstrates the ability of the new development to meet local authority waste management recycling targets.

**Supporting Text:**

- 9.1.1 Recycling rates in London have historically been quite low due to the limited availability of communal and household storage space, and poorly designed buildings.
- 9.1.2 Evidence shows that recycling rates for communal flat collections are significantly lower than those from individual household kerbside collections. This is due to a complex set of circumstances including the communal nature of collections, inconsistent and often poor collection provision, poor bin storage, and a lack of knowledge, ownership and engagement from residents. This is also the case in some office and commercial buildings. To address this issue, greater consideration must be given to the design of buildings in relation to waste management.
- 9.1.3 In order to meet the waste management targets set in the London Plan and protect amenity, proposals for new developments (excluding householder applications) should include a detailed waste storage and management strategy. The scope of this strategy should be commensurate to the scale of development and provide detail relating to the management of waste arising from the occupation of the building including plans to indicate how waste will be stored, collected, and managed. Details regarding the storage and reuse of construction materials on site should also be submitted in line with circular economy principles.
- 9.1.4 Appropriate types of storage and collection systems for waste will depend on the type of development proposed. Examples of development typologies include HMOs, live/work accommodation and residential institutions, including specialist housing for older people, and student accommodation, as well as office and commercial spaces. The Council has adopted a Waste Strategy that provides guidance for flats and HMO dwellings, this guidance should be considered early in the design phase of any development to ensure its efficacy.

9.1.5 Details surrounding acceptable bin sizes, types and standards can be found on the Council's webpage where bins can also be ordered and fixed. Alternatively, applicants can contact the Council's Environmental Services department for advice.

9.1.6 All development should respond to waste management guidance set out in the NPPF, London Plan and Re:London guidance.

## Policy CE2: Design to Support the Circular Economy

*Linkages:*

*NPPF Chapter*

*London Plan London Plan Policy SI7 Managing waste and supporting the circular economy*

*London Plan Policy SI8 Waste capacity and net-waste self sufficiency*

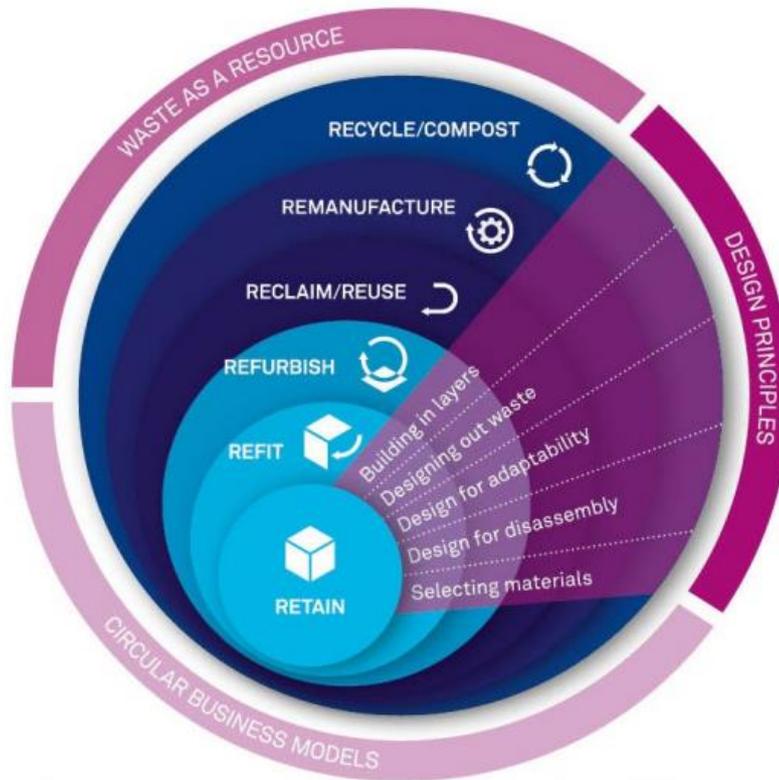
### **Policy CE2: Design to Support the Circular Economy**

- A. Development proposals should apply circular economy principles in order to conserve resources and improve resource efficiency, with reference to London Plan policy SI7 (Reducing waste and supporting the circular economy).
- B. Major development proposals should aim to be net zero-waste. Any development proposals referred to the Mayor of London are required to submit a Circular Economy Statement in compliance with London Plan policy SI7.
- C. Consideration of Circular Economy principles should be given to the construction and operation of all types of development. Demonstration of circular economy considerations will be looked upon favourably in planning applications.

### **Supporting Text:**

- 9.2.1 A circular economy is achieved by keeping materials in use for as long as possible, delivering the highest value, for as long as they can. The circular economy is the opposite of a linear economy where things are made, used and then thrown away. To achieve the circular economy and minimise embodied carbon in buildings we need to look for new ways to manufacture, select, use and reuse materials, particularly reusing materials on site from old buildings and incorporating them in new buildings.
- 9.2.2 All development should aim to minimise waste and maximise recycling of materials in new developments.

### Circular economy hierarchy for building approaches



Source: Building Revolutions (2016), David Cheshire, RIBA Publishing



## Chapter 10: Transport and Movement

## Strategic Policy 10: Movement

*Linkages:*

*NPPF Chapter: 9 Promoting Sustainable Transport*

*London Plan Chapter: 10 Transport*

*London Plan Policy T2 Healthy Streets*

*London Plan Policy T1 Strategic approach to Transport*

### **Strategic Policy 10: Movement**

Travel in Harrow will be designed and integrated around communities to support everyday journeys and drive long-term sustainable growth, minimising private vehicle travel where possible. To achieve this, the London Borough of Harrow is committed to creating more pleasant neighbourhoods and town centres with better air quality, safer streets, improved accessibility and sustainable travel opportunities for all.

Public and active transport travel networks will be enhanced to become attractive alternatives to private vehicles. Those travelling through the borough will be encouraged to shift towards these healthier and greener choices. This will support the borough's mission to decarbonise transport, ensure infrastructure is resilient to climate change, and secure Harrow's long-term status as an attractive location for residents, workers and visitors.

To achieve the above vision:

- A. Development proposals must facilitate improvements to transport infrastructure through active travel, and the public transport network to deliver safe, accessible, inclusive, healthy, walkable and sustainable neighbourhoods, and mitigate their transport impacts through planning obligations.
- B. Development must make effective use of land, improving its connectivity and accessibility to existing and future public transport, walking and cycling routes, complying with London Plan parking standards to reduce the land take needed for carparking and mitigating any adverse impacts on London's transport networks and supporting infrastructure.
- C. The Council will seek to improve access to public transport, including the provision of fully accessible step-free station links, particularly in areas of deprivation and for people with a disability, by working with Transport for London (TfL) to promote and improve public transport infrastructure, capacity where needed to support development and all abilities access.
- D. The Council will apply the Healthy Streets Approach to transport outlined in the Mayor of London's Transport Strategy (2018), and any subsequent Transport Strategy.

- E. The Council will seek to encourage and enable people to choose active transport by improving walking and cycling infrastructure across the borough. Improvements to road safety will be made to facilitate this in line with the Mayor’s Vision Zero objective.
- F. The Council will seek to reduce vehicular emissions through supporting car clubs, and encouraging efficient, low-emission freight and delivery trips.
- G. The Council will actively support and facilitate the transition to Electric Vehicles (EV) by planning for the provision of charging infrastructure in new developments and the public realm.

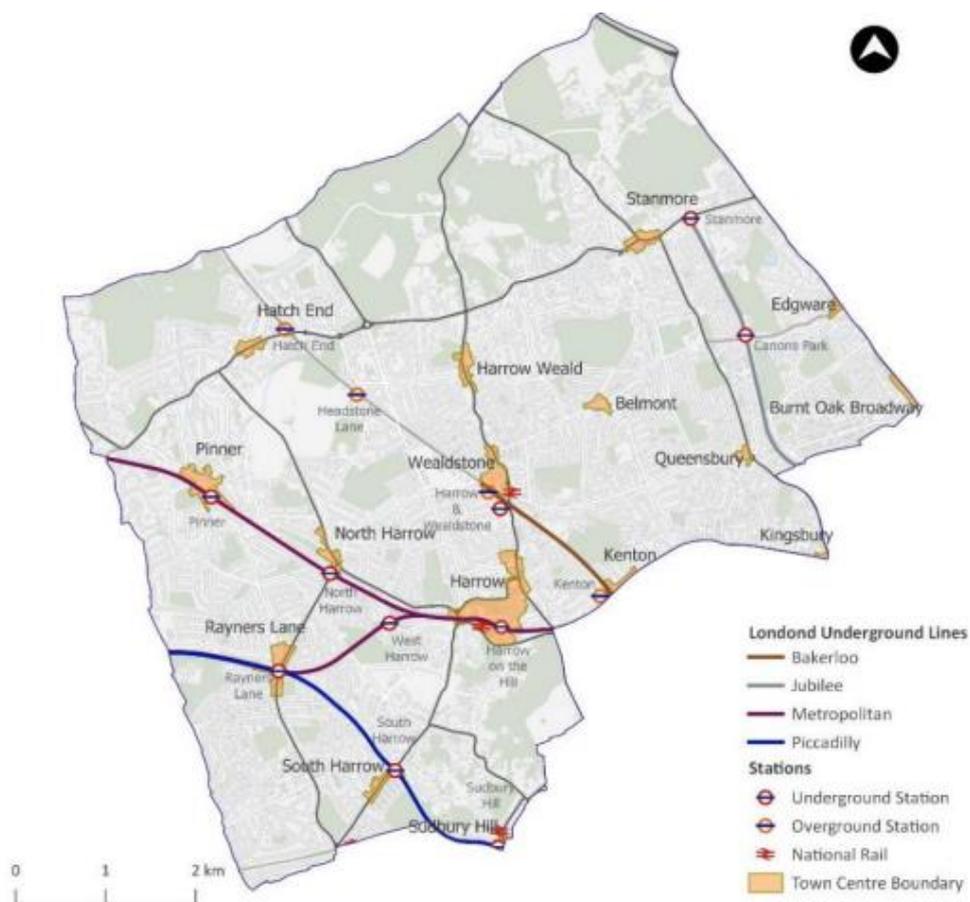
### Supporting Text:

- 10.0.1 A decarbonised, integrated, safe and accessible transport system is a vital requirement of the inclusive and healthy borough that the Council is working to create. Transport connects people to jobs, goods to businesses, and provides opportunities for education and leisure so that everyone benefits from sustainable economic growth.
- 10.0.2 The NPPF requires transport issues to be considered at the earliest stages of plan making and development proposals to address the potential impacts of development on transport networks, and realise opportunities presented by transport infrastructure, active travel, public transport, and climate change mitigation. Careful consideration needs to be given to the design of schemes so that they contribute to the making of high-quality places.
- 10.0.3 As identified in the Mayor of London’s Transport Strategy, the only realistic way to address some of the transport challenges problems is to reduce dependency on cars in favour of active, efficient and sustainable modes of travel. The Mayor’s Strategy has set a target for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041. The Council will work with TfL to identify additional targets for future iterations of the Mayor’s Transport Strategy. The Healthy Streets Approach identified in the Strategy is also central to the development of healthy and sustainable streets across Harrow.
- 10.0.4 The LB Harrow Healthy Streets Data Pack (2024) produced by TfL outlines progress to date against the Mayor’s Transport Strategy targets. This data shows that Harrow is generally on track to meet 2041 commitments. The Council intends to make strategic transport improvements in line with the datasets and mapping outlined in the Road Safety Priorities (2023), Strategic Cycling Analysis (2022), Bus Network Clarifications (2019), Bus Underperformance (2023), Strategic Walking Analysis (2023), and Strategic Neighbourhood Analysis (2023).
- 10.0.5 The draft Harrow Long Term Transport Strategy (LTTS) provides the policy framework for the planning and delivery of improved transport infrastructure and services in Harrow. The Strategy aims to address current barriers that affect the movement of people and goods and respond to the declared climate

emergency. It contains four ambitions (healthy lives and safer streets, vibrant communities for all, greener travel options, and keeping Harrow moving and growing) and a series of priorities, actions and measures to achieve these. Regard should be given to the Long Term Transport Strategy (LTTTS) when considering the potential for development and infrastructure within the borough to contribute to the outcomes sought in both this Local Plan and the LTTTS.

10.0.6 The Harrow Electric Vehicle (EV) Strategy (2023) aims to facilitate the transition to Electric Vehicles across the borough. The Strategy projects that the number of EVs in Harrow will increase from circa 3,500 EV cars and light commercial vehicles in 2022 to nearly 9,500 EVs by 2026 and 68,000 EVs (or over 60% of total registered vehicles) by 2038. The Strategy and accompanying action plan should be considered in all applications relating to EV parking or charging infrastructure. The Council aims to install 400+ EV lamp column chargers, 40+ EV flush and flat chargers, and approximately 11 rapid EV chargers across the borough over the next two years.

### Rail and Underground Network within Harrow



Source: Ordnance Survey (2021)

### *The Challenge*

- 10.0.7 Harrow, as an outer London Borough, still has higher than average rates of private vehicle use however, there has been a significant uptake in electric vehicle usage in recent years. The Council will support the transition to sustainable transport by enabling the use of electric private vehicles where necessary, and through providing infrastructure to increase rates of active and public transport.
- 10.0.8 While private car use will continue to have a role in the borough during the Local Plan period, enabling people to make more active travel choices as part of their daily lives will play an important role in improving health and wellbeing, and reducing dependence on private vehicles.
- 10.0.9 A shift to sustainable travel modes and lower emissions vehicles will also be vital enable Harrow to decarbonise its activities by 2030 and reduce air pollution. To encourage higher levels of public transport usage, additional bus routes with enhanced connectivity will be sought in and through the borough. The Council will work with TfL and other partners to deliver additional bus routes and services.
- 10.0.10 This chapter aims to ensure that people are able to freely, safely, efficiently and sustainably move around and through the borough. Everyone should have access to sustainable neighbourhoods that provide for day-to-day needs without requiring a private vehicle.
- 10.0.11 The policies set out in this chapter have cross cutting objectives with most other policies in this Local Plan, in particular those relating to climate change, health, air quality, and good design.

### **Public transport serving Harrow**



## Policy M1: Sustainable Transport

*Linkages:*

*NPPF Chapter: 9 Promoting Sustainable Transport*

*London Plan Chapter: 10 Transport*

*London Plan Policy T2 Healthy Streets*

*London Plan Policy T4 Assessing and mitigating transport impacts*

*London Plan Policy T5 Cycling*

### **Policy M1: Sustainable Transport**

- A. Development must:
- a. Contribute to the delivery of sustainable neighbourhoods through the enhancement of cycle and pedestrian connections, and other forms of sustainable travel, to local destinations, town centres, transport hubs, schools and amenities;
  - b. Design new development in accordance with the London Plan's Healthy Streets approach, prioritising safe and convenient access routes for pedestrians, cyclists and those with disabilities;
  - c. Protect and enhance any existing publicly accessible cycle and pedestrian routes that cross development sites and maximise opportunities to improve public accessibility by providing new connections through sites;
  - d. Support the delivery of strategic or local cycle networks in and through the borough;
  - e. Provide accessible, secure, and convenient cycle parking for all users, located in prominent locations, which meet or exceed London Plan requirements and London Cycle Design Standards. Facilities should include provision for charging of electric bikes.
  - f. Deliver accessible cycle parking for people using cargo bikes or adapted cycles, and for people who may not be able to lift bikes;
  - g. Provide a development contribution towards publicly accessible cycle parking and dockless cycle and scooter hire schemes where required;
  - h. Provide well-designed, accessible facilities including prominent, accessible and well-located showers, changing rooms and lockers.
- B. Major development proposals must demonstrate through the submission of a Travel Plan and Transport Assessment, (or a Transport Statement for Minor development proposals) that negative impacts on the transport network have been considered, identified and mitigated, supporting modal shift away from private vehicles.

### Supporting Text:

- 10.1.1 The London Plan aims to enable a significant increase in active travel with walking and cycling becoming the primary, default choice because it has been made easier and safer. Active travel requires journeys to be made through physically active modes such as walking, cycling, skateboarding, scooters, etc.
- 10.1.2 Walking and cycling are environmentally friendly, healthy, cheap and reliable forms of transport that provide a realistic alternative to the car for many short trips. Active travel choices are one of the easiest ways to integrate regular exercise into a daily routine, enhancing physical and mental health incidentally. All development must aim to facilitate active travel choices, as good planning can make it easy for people to build activity into their daily lives.
- 10.1.3 Development can enable active travel through contributing to convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns. Much of this can be facilitated through the masterplanning process of town centres and transport corridors, in which the development of specific sites will contribute via planning obligations, or on-site provision.
- 10.1.4 The Council has committed to several strategic active travel projects and is continually planning further upgrades to the active travel network, often in partnership with Transport for London. Current projects include:
- a. The Harrow to Pinner cycleway and public realm improvement project
  - b. Expansion of the School Streets programme to approximately 18 areas across the borough
  - c. The Highway Infrastructure Asset Management Plan (HIAMP)– Footway & Carriageway Resurfacing Programmes
  - d. Harrow on the Hill Station Cycle Hub
  - e. Pedestrian improvements to the Harrow View/ Headstone Drive/ Headstone Gardens junction, also known as the 'Goodwill to All junction'.
- 10.1.5 At present, car travel is still the dominant mode of transport in Harrow, with a particularly low cycling mode share. The borough has somewhat poor public transport accessibility and low levels of step free access at rail and tube stations. Many opportunities exist to realise the potential Harrow has to create a robust, green and inclusive transport system. These opportunities are planned for in Harrow's Long Term Transport Study (2023), which should be read in conjunction with the Mayor of London's Transport Strategy (2018). These documents should be used to inform future development proposals and decision making around transport in the borough.

*Minimising the Impact of Development*

- 10.1.6 Applicants must minimise the adverse impact of development on the surrounding area and ensure that developments are consistent with policy objectives. To achieve this, the likely impact of development needs to be assessed through planning applications. The mitigation of any development should focus on reducing the need for, and impact of, private vehicles and provide increased opportunities for sustainable access through public transport, walking and cycling.
- 10.1.7 Different types of development will have different impacts on the environment and local surroundings. The impact of the development may be influenced by the following aspects:
- (a) Scale of development
  - (b) Proximity to employment, town centres, services (retail / leisure etc) and community infrastructure
  - (c) Characteristics of people using / visiting the development
  - (d) Construction time
  - (e) Servicing facilities
  - (f) Proximity to public transport (PTAL Levels)
  - (g) Surrounding road network and local service roads
  - (h) Building accessibility
  - (i) Available car parking
  - (j) Available car clubs
  - (k) Availability of electric vehicle charging facilities
  - (l) Local car ownership
  - (m) Local traffic conditions
  - (n) Availability of parking permits
  - (o) Local parking restrictions
  - (p) Walking and cycling ease
  - (q) Wayfinding and legibility
  - (r) Bike hire facilities
  - (s) Cycle path availability

*Transport Assessments:*

- 10.1.8 Transport Assessments consider the impact of development on all forms of transport and explain how these impacts will be dealt with. Transport Assessments provide information on transport conditions and transport issues before, during and after completion of the development. Assessments should address impacts to public transport, the highway network, the strategic and local cycle network, and impacts on cyclists and pedestrians.
- 10.1.9 Transport Assessments need to demonstrate that the development will not have a negative impact on safety, cause congestion or lead to illegal or additional parking near the site of the proposed development. They must also show how the development is going to restrict car dependency, and improve, provide and promote sustainable travel through public transport and active travel.

10.1.10 Where multiple major developments are proposed in an area, the Council will encourage developers to cooperate to assess the cumulative impacts of the proposals on the transport network. Transport Assessments should be proportionate to the scale of the development proposal. A transport assessment may still be required for smaller developments where the proposal is likely to have a significant transport impact. This will be agreed with applicants at pre-application stage.

*Transport Statements:*

10.1.11 Transport Statements are a simplified Transport Assessment prepared as part of a smaller scale development application where the impact on local transport networks is likely to be of a smaller scale.

10.1.12 Applicants should demonstrate that the development proposal satisfies the Council's transport policies through a Transport Statement. The scope of any transport statement should be agreed with the Council at pre-application stage in discussion with Traffic and Highways. A Transport Statement should outline the existing site conditions and the proposed transport aspects of the development design (parking, site access points, servicing arrangements, access to public transport, cycle parking provision).

*Travel Plans:*

10.1.13 Travel Plans are an agreed set of measures that reduce reliance on private vehicles and as a result, reduce the impact of travel and transport on the environment (i.e. car clubs, bike hire/storage, etc). This contributes to a reduction in fossil fuel use, energy consumption, the need to travel and reduced air pollution.

10.1.14 Travel Plans seek to ensure that once a development is occupied and operational, the management / mitigation measures identified through the transport assessment are implemented and their effectiveness monitored. Travel Plans play an important role in bringing forward initiatives that contribute to the achievement of a modal shift away from car use.

10.1.15 While Travel Plans should be developed as a standalone document, they should aim to address any issues identified within the associated transport assessment through the promotion of sustainable transport.

10.1.16 Travel Plans must be submitted as part of the initial planning application, alongside the Transport Assessment. Travel Plans will be secured by way of a condition on the permission or a S106 planning obligation, which the applicant will need to continue to implement and manage over the lifetime of the development. The Council will require developer contributions by planning obligation for the monitoring and review of Travel Plans.

### Healthy Streets Indicators



## Policy M2: Parking

*Linkages:*

*NPPF Chapter: 9 Promoting Sustainable Transport*

*London Plan Chapter: 10 Transport*

*London Plan Policy T6 Car Parking*

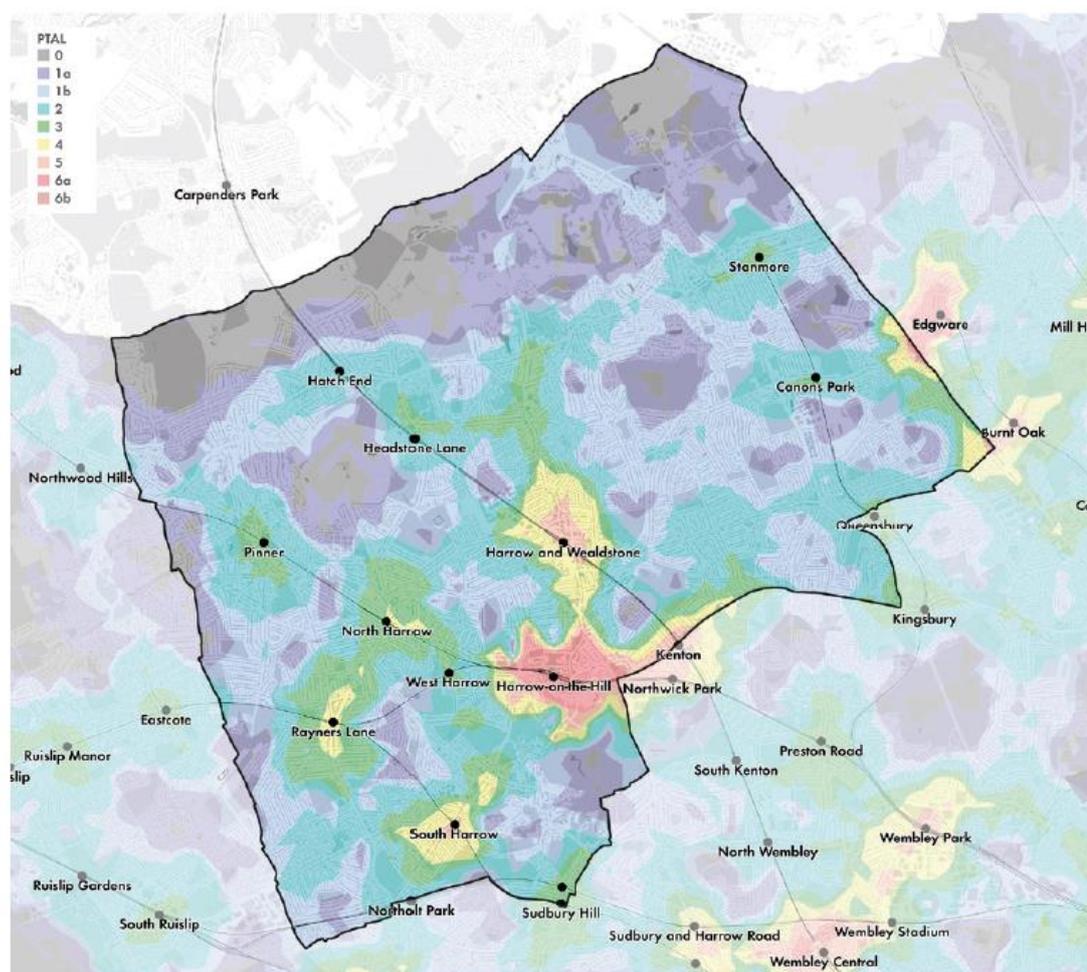
### **Policy M2: Parking**

- A. Development proposals will be supported where:
  - a. The number of vehicle parking spaces (including those with electric vehicle charging points) complies with the maximum London Plan standards;
  - b. There is provision for 1 motorcycle parking space per 20 car parking spaces subject to all developments with more than 10 car parking spaces having a minimum of 1 space; and
  - c. The number of cycle parking spaces would meet or exceed the minimum London Plan standards and comply with London Cycle Design Standards.
- B. Proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements and satisfactory mitigation, any special safety considerations and the desirability of achieving modal shift away from private car use.
- C. Proposals that secure the delivery of car club schemes in lieu of parking provision for private vehicles will be encouraged.
- D. The design and layout of parking areas (including those for scooters, motorcycles and bicycles) should be safe, secure and fit for purpose, Access to and from the public highway should maintain and, where necessary, improve safety and give priority to the convenience of pedestrians and cyclists in line with London Plan Policy T2 (Healthy Streets).
- E. Proposals that create significant on-street parking problems, prejudice highway safety or diminish the convenience of pedestrians and cyclists, will be resisted.
- F. Off-street parking should provide adequate soft landscaping, permeable surfaces and appropriate boundary treatments to offset adverse visual impacts and increases in surface water run-off. Parking on front gardens should provide a minimum 50% coverage of soft landscaping and permeable surfaces. Car park entrances must be of an acceptable width to ensure safe access and visibility.
- G. Development in Town Centres should prioritise walking, cycling and public transport, including access to and from town centres. The public realm will be designed to support modal shift away from car use. Services and activities within the public realm will be supported. London Plan car parking maximums for office, retail and hotel accommodation must be complied with.
- H. Any proposed reduction of car parking (either on-street or off-street) should consider the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality in line with the Harrow Parking Strategy. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.

### Supporting Text:

- 10.2.1 Parking for new development will be managed to contribute to the delivery of a modal shift from private cars to more sustainable modes, with an emphasis on active travel and public transport. Development should provide parking in accordance with standards set by the London Plan.
- 10.2.2 Car free developments should be the starting point in areas that are well connected to public transport (PTAL 4-6). Developments in areas with lower public transport connectivity (PTAL0-1) should adhere to maximum parking standards as set by the London Plan, except where a minimum provision would support additional family housing.

### Public Transport Accessibility Levels (PTAL)



Source: Harrow Characterisation and Tall Buildings Study (2021)

- 10.2.3 All development must include infrastructure for EV and ultra-low-emissions vehicles in conformity with London Plan Policy T6 (G). Proposals with higher rates of EV charging infrastructure (>50% of overall spaces with active charging points) will be looked upon favourably. Proposals in the public realm should consider the provision of publicly accessible charging points, in line with the Council's EV Strategy. Proposals for office or commercial

development should include publicly accessible charging points where possible. The integration of bike and car sharing clubs should be strongly considered.

- 10.2.4 Households in Harrow continue to exhibit comparatively high levels of car ownership. It is likely that car ownership will continue to be a preference for many residents and that this mode will continue to be a component of economic activity and outer London inter-connectivity for the foreseeable future.
- 10.2.5 The objective of this policy is to realise the transport benefits of Harrow's spatial strategy by ensuring that proposals contribute to modal shift and meet the transport needs of future occupiers of developments. This will be achieved by focusing new development in areas of high public transport accessibility and where access to services is possible by sustainable transport modes such as walking and cycling.
- 10.2.6 Transport is a matter of strategic significance to London as a whole and is therefore addressed in the NPPF (2021) and the London Plan (Chapter 10 Policy T6). The London Plan sets standards for car parking of all types, development proposals must comply with these standards.
- 10.2.7 There is greater demand for car use in outer London given its lower-density, suburban nature and lower levels of public transport accessibility and sustainable transport options. Due to the demand generated by occupiers and users of development in outer London it is anticipated that developers will continue to seek to provide parking as part of their proposals. In many instances some level of vehicle parking is likely to be necessary for operational reasons. On-site provision of vehicle parking can overcome some issues with on-street parking particularly in residential areas where on-street parking can result in congestion and hindrance to traffic flow.
- 10.2.8 The London Plan specifies maximum general parking standards. Minimum standards are set with respect to disabled parking, cycle parking and the percentage of car parking spaces that must have active provision for electric vehicle charging. London Plan guidance must be followed as it refers to outer London PTAL levels, and space numbers must not exceed the maximum standard outlined in the London Plan.
- 10.2.9 Car free developments are those that make no general on or off-site provision for car parking other than that required to meet the needs of disabled persons. Where located in areas of high public transport accessibility levels (PTAL4-6) and access to services through sustainable transport modes, such schemes are an effective means of delivering a modal shift away from private car use. New development must demonstrate that future occupiers' ability to access their reasonable shopping, service and employment needs would not be disadvantaged, and that visitors and other users of the development (particularly in respect of non-residential uses) would not be severely disadvantaged by the absence of car parking. In Harrow, the Harrow & Wealdstone Opportunity Area and town centres with a PTAL of 4-6 provide the most suitable locations for car-free development. They provide occupiers

with direct access to local shops, services and employment opportunities, and are generally served by multiple local bus services and/or a rail station for access to shops, services and employment elsewhere.

10.2.10 Applicants should provide detailed Parking Design and Management plans as part of any application proposing implementation of car parking. The Plans should detail all aspects outlined in the London Plan. Consideration should be given for adequate emergency vehicle parking and, where relevant, health and social care vehicles.

10.2.11 Development in the Harrow & Wealdstone Opportunity Area and Town Centres should prioritise walking, cycling and public transport. Infrastructure to support modal shift away from fossil fuel car use should be prioritised by any development including:

- (a) Safe and secure bike parking (ideally covered with CCTV in operation in accordance with London Cycling Design Standards);
- (b) Rapid electric vehicle charging points;
- (c) Parking spaces for shared electric bikes and scooters;
- (d) Installation of cycle lanes;
- (e) High quality pedestrian thoroughfares.

## Policy M3: Deliveries, Servicing and Construction

*Linkages:*

*NPPF Chapter: 9 Promoting Sustainable Transport*

*London Plan Chapter: 10 Transport*

*London Plan Policy T7 Deliveries, servicing and construction*

### **Policy M3: Deliveries, Servicing and Construction**

Development proposals which facilitate sustainable freight movement by rail, waterways and road where appropriate, will be supported in line with Policy T7 of the London Plan.

All development proposals should seek to minimise the adverse impacts of deliveries, freight and servicing by:

- A. Reducing the number freight, servicing and delivery trips to and from developments at the construction and operational phases;
- B. Demonstrating through the submission of a Construction Logistics Plan (Major applications only), any impacts on the transport network during the construction phase of the development (including road closures and damage to the transport network) will be managed and mitigated to the satisfaction of the Council.
- C. Demonstrating that the proposal and site layout make adequate provision for emergency services access, deliveries, servicing, refuse collection, and visitor drop-off and pickups.
- D. Arranging construction deliveries outside of peak hours and in the evening or night-time.
- E. Where appropriate, promoting facilities to enable efficient online retailing and minimise additional freight trips arising from missed deliveries, including storage lockers or concierge services.
- F. Facilitating efficient, safe and low-emission delivery and servicing trips in accordance with TfL's latest guidance on Delivery and Servicing Plans.

### **Supporting Text**

#### *Construction Logistics*

10.3.1 The construction phase of development can present significant logistic and environmental challenges particularly for large, complex and constrained sites or sites that are located in town centres, residential areas or near schools. Construction typically generates a significant number of vehicle trips, often involving heavy goods vehicles and machinery. These trips should be considered and mitigated to minimise disruption and safety hazards in accordance with TfL's Construction Logistics Plan Guidance. Any damage to road surfaces caused by vehicle movements to, from and around the

development site will be repaired at a cost to the applicant. The Construction Logistics Plan should prioritise the maintenance of safe and inclusive access for pedestrians, cyclists and public transport users. TfL Delivery and Servicing Plan guidance should be followed.

- 10.3.2 Construction works will need to secure the necessary approvals and licenses from the Council's Highways Department a minimum of 60 days before commencement of works. Financial contributions may be sought to ensure that disruption to roads is minimised, and any damage is repaired.

*Deliveries and Servicing*

- 10.3.3 Deliveries and servicing are often thought of late in the design of developments, which can lead to poor outcomes for occupants and disruption to the highway network. To avoid this, the logistics of servicing and deliveries must be considered early in the design of developments.
- 10.3.4 Since the pandemic there has been an increase in online shopping and home deliveries leading to increase delivery trips, often using heavy goods vehicles. This results in more traffic on the roads, particularly using larger vehicles that stop often for pick-ups and drop-offs. These vehicles can cause congestion and are often required to stop in areas not designated for loading, which can in turn disrupt traffic, cyclists, pedestrians and parking. Ensuring that there is a safe and easily accessible area for goods and servicing vehicles in the early stages of development must be a priority.
- 10.3.5 Where a development is likely to generate a significant amount goods or delivery vehicles trips, a Delivery and Servicing Plan will be required in accordance with TfL's latest guidance. These plans are required to improve the safety, efficiency and sustainability of delivery and servicing vehicles through interventions including consolidation, low carbon delivery modes and the retiming of movements to avoid peak hours. Consideration should be given to onsite electric charging infrastructure and parking to support low carbon fleets including e-cargo bikes, where appropriate. Consideration should also be given to the role of, and opportunities for, shared consolidation facilities for deliveries and servicing as a means of minimising vehicle movements, reducing overall levels of congestion and improving road safety.
- 10.3.6 Safe servicing access must be provided for recycling and refuse in accordance with Policy CE1 Reducing and Managing Waste.
- 10.3.7 An accessible, safe and secure postal storage area must be provided for postal servicing, including a secure parcel storage area to minimise parcel theft. Applicants are advised to discuss such elements with the Metropolitan Police (Secure by Design) early in the design of a scheme.



## Chapter 11: Site Allocations

## Introduction

- 11.1 This chapter identifies sites which are allocated for a particular use or development, as set in in Policy GR12: Site Allocations. It does not include every potential development site in the Borough. Rather it focuses on a series of sites which have been identified and assessed during the preparation of the local plan as suitable for development, achievable and available to come forward during the lifetime of the plan. These sites form part of a development pipeline which will meet the Borough's targets for additional housing including a buffer to accommodate potential under-delivery. Other sites may come forward as 'windfall' sites during the plan period and an allowance has been included in the housing supply / trajectory to reflect this.
- 11.2 Sites are also allocated where required to accommodate additional non-residential and infrastructure development to meet identified need.
- 11.3 The Council considers the uses set out in this chapter to be the most appropriate for each site and in line with existing and emerging planning policies. A site being allocated for certain use(s) within this document does not guarantee planning permission - this will be decided by the merits of the application when it is submitted, and will need to be assessed against the full suite of Development Plan policies (including this chapter and Policy GR12: Site Allocations).
- 11.4 This chapter does not seek to repeat policies which are out elsewhere in the Local Plan. Each site allocation includes information relevant to the site including identifying some relevant development constraints and designations. The appropriate policies of the Local Plan should be referred to for guidance on how information in the site allocation should be taken into account in the planning decision making process.
- 11.5 The site designations (as shown on the policies map) and constraints are not an exhaustive list of all relevant designations and constraints for each site. Rather the lists provided are indicative and include the most important designations which have been considered for the purpose of site allocations. Applicants must determine all relevant designations on a case-by-case basis. Applicants are encouraged to engage in pre-application discussions on proposals and applicable policies on this and other matters.
- 11.6 The following information is provided for each site allocation:
- (a) The site location and address, and an outline of the site boundary
  - (b) Information on how the site was identified and any relevant planning history.
  - (c) The approximate area of the site
  - (d) Site ownership details (i.e. whether it is in public or private ownership)
  - (e) Objectives for development
  - (f) Allocated leading and supporting land uses and an indicative residential capacity
  - (g) A timeframe for development
  - (h) Planning considerations
  - (i) Development requirements and principles

## Site allocation methodology

### Site identification

- 11.7 Sites were identified from:
- (a) A call for sites during Regulation 18 consultation, and an earlier informal call for sites (both of these were open for any site to be put forward for any potential use),
  - (b) A review of previous allocations under the Harrow Site Allocations Local Plan 2013 and Harrow & Wealdstone Area Action Plan 2013
  - (c) Major Council development, regeneration and estate renewal programs
  - (d) A review of strategically located retail sites with large car parks
- 11.8 Sites were only considered for allocation if they had an area of at least 0.25ha or were proposing to deliver at least 10 housing units or 500sqm of additional employment floorspace. Sites which did not meet these criteria were not considered to be sufficiently large and so did not merit site allocation (but are likely to come forward as ‘windfalls’. Existing allocations were excluded from further consideration if had been delivered or were expected to be delivered by the commencement of the Plan.

### Site assessment and selection

- 11.9 A full assessment of site suitability was carried out to obtain a full picture of site suitability and to select the most suitable sites for allocation. The following criteria were used to exclude sites from allocation (although additional criteria would have been used if sites had significant constraints, larger impacts or significant contraventions of other policies). Sites excluded for these reasons contravene draft Local Plan policies which have been tested against reasonable alternatives during the local plan process and through integrated impact assessment (IIA):
- (a) Sites in the Green Belt or Metropolitan Open Land were excluded, as development would be inconsistent with the London Plan and Council’s draft Local Plan. In addition, as Council’s housing target as set in the London Plan (and carried forward for the full plan period) is capable of being met through proposed allocations, the development pipeline (under construction or with planning permission) and a windfall allowance, exceptional circumstances were considered not to exist to justify allocation of these sites.
  - (b) Sites which are Designated Open Space were excluded, as development of these sites would be contrary to the draft Local Plan and has the potential to decrease access to open space in the Borough.
  - (c) Sites with industrial land designations or in industrial use were excluded if they are not on the edge of a designated employment area or a stand-alone site, and if development would not deliver improved or better functioning employment space.

- 11.10 Following this process, adjacent sites were amalgamated into a single proposed allocation and additional adjoining parcels added in cases where site amalgamation (or failing that a consolidated design approach) would better optimize overall site outcomes and capacity, or would lead to development proceeding in a more rational way, as set out in paragraph D of Policy GR12: Site Allocations.
- 11.12 A comprehensive assessment of each site selected for allocation was carried out through evidence base documents, specifically the Integrated Impact Assessment, Level 2 Strategic Flood Risk Assessment (SFRA), Infrastructure Delivery Plan and Local Plan Viability Study. This did not result in exclusion of any further sites, but did influence development considerations and requirements as set out in the final site allocations.
- 11.13 In terms of the flood risk requirements of the NPPF, the site selection process demonstrates that it is not possible to fully meet the development needs of the borough solely within areas with a lower risk of flooding (taking into account wider sustainable development objectives) i.e. the sequential test. Consequently, it has been necessary to apply the exception test outlined in the NPPF.
- 11.14 In this regard, the site selection process itself [as well as the Integrated Impact Assessment (IIA)] of the proposed site allocations demonstrate that any the proposed site allocations subject to flood risk will provide wider sustainability benefits to the community / Local Plan (including contribution to meeting development needs) that outweigh the flood risk. Furthermore, the Level 2 SFRA demonstrates that the proposed allocations / uses will be safe / can be made safe, having regard to the vulnerability of the proposed uses and the level of flood risk. Therefore, the proposed site allocations meet both elements of the exceptions test.

### Timeframes

- 11.15 For each site, a broad timescale has been identified for when development on the site is likely to come forward. This is based on the Council's judgement and has been informed by an assessment of site availability and achievability, including among other things:
- (a) Land ownership and existing leases;
  - (b) Planning permissions granted and whether pre-application discussions have occurred;
  - (c) Landowner intentions and site marketing, as established through call for sites, engagement during plan preparation and through the planning application process; and
  - (d) The size and complexity of each scheme
- 11.16 Existing unimplemented allocations which were considered to be very unlikely to become available for development over the plan period were excluded from allocation.

11.17 Based on this assessment, an assumption has been made as to when in the plan period development is likely to take place following the likely date of plan adoption: Years 1-5 (2026/27 – 2030/31), Years 6-10 (2031/32 – 2035/36) or years 11-15 (2036/37 – 2040/41).

### Site capacity

11.18 Indicative residential capacities for each site were established using a hierarchy of approaches:

- (a) The permitted quantum of housing on relevant sites where existing schemes are permitted and likely to be delivered on that basis,
- (b) An uplift on sites with planning permission where reworking of existing schemes is likely to occur based on stated landowner intentions,
- (c) A design-based capacity study establishing potential building massing on other sites in line with London Plan policies D1, D2 and D3

11.19 For sites where design-led capacities have been used, a further uplift of 10% has been applied to resulting residential capacities. This is intended to reflect the outcome of development management processes which typically result in an uplift from expected site capacities through negotiation and further optimization of site capacities by proponents as part of a detailed design process.

### List of sites

11.20 The sites are listed below. In each case an indicative residential capacity has been provided, which refers to the number of C3 dwelling houses / units or equivalent where not otherwise stated. The contribution to the housing trajectory of each site has also been provided, noting the 10% uplift applied as discussed above.

11.21 A summary of the non-residential land uses allocated for each site is also provided. These summaries are intended as a consolidated reference only, and the more detailed site allocations should be referred to in each case for the wording of allocated uses.

Site Ref.	Name	Indicative residential capacity	Contribution to housing trajectory	Non-residential land uses
<b>Opportunity Area</b>				
OA1	Queen's House Carpark	129	142	Town centre uses Car parking
OA2	Harrow on the Hill Underground and Bus Stations	363	399	Rail & bus transportation hub Town centre uses
OA3	15-29 College Road	86	95	Town centre uses Public realm Reprovision of place of worship / social infrastructure
OA4	Havelock Place	294	323	Town centre uses
OA5	Station Road East, Harrow	171	188	Town centre uses
OA6	Greenhill Way	371	408	Town Centre Uses

Site Ref.	Name	Indicative residential capacity	Contribution to housing trajectory	Non-residential land uses
				NHS floorspace Community / civic uses Public house Car parking Public open space
OA7	Tesco Station Road	500	500	Supermarket
OA8	Former Royal Mail Postal Delivery Office, Elmgrove Road	18	20	Industrial
OA9	Poet's Corner & Milton Road	1139	1,139	Town centre uses to serve development NHS floorspace Community floorspace Open space
OA10	Wealdstone Probation Office	18 (hostel accomm.)	20	Replacement employment space (industrial or related)
OA11	Carpark Ellen Webb Drive	183	201	Hotel Town centre uses Car parking reprovision
OA12	Peel Road	207	228	Car parking Place of worship Civic / community uses NHS floorspace
OA13	Travis Perkins Wealdstone	18	20	Industrial (or related)
OA14	Byron Quarter	683	702	Leisure & community uses Car parking NHS floorspace
OA15	Iceland Wealdstone	25	28	Retail
OA16	Kodak	2675	2,675	Industrial and employment (B2 & B8) NHS floorspace E use class to service development and immediate area F1 learning and non-res. Institutions including primary school Community centre Green link
OA17	Former Kodak Administration Offices	120	132	Flexible employment space
<b>Green Belt</b>				
GB1	Royal National Orthopaedic Hospital (RNOH)	500	500	Hospital Research & innovation institutions Green Belt
GB2	Watling Farm	12-13 additional gypsy & traveller pitches	-	
<b>Other sites</b>				
O1	Waitrose South Harrow	124	136	Supermarket
O2	Roxeth Library & Clinic	15	17	Community uses Town centre uses NHS floorspace

Site Ref.	Name	Indicative residential capacity	Contribution to housing trajectory	Non-residential land uses
O3	Northolt Road Nursery and Carpark at rear of 27 Northolt Road	37	41	Nursery Offices
O4	Grange Farm	300	300	Community hub Open space
O5	Harrow School Estate & John Lyon School	N/A	N/A	Refurbishment / redevelopment of school buildings, sports facilities and enhancement of playing fields
O6	Brethrens' Meeting Hall, The Ridgeway	N/A	N/A	School
O7	Rayners Lane Station Carpark	69	76	Car parking Town centre uses (eastern part of site only)
O8	Harrow West Conservative Association	13	14	Community or employment space
O9	Pinner Telephone Exchange	44	48	
O10	Harrow View Telephone Exchange	27	30	
O11	North Harrow Methodist Church	33	36	Church & community facilities Limited retail use
O12	Hatch End Telephone Exchange	44	48	Town centre uses (within designated shopping frontage)
O13	Harrow Arts Centre	N/A	N/A	Arts centre & associated uses
O14	Vernon Lodge	56 (specialist older persons accomm.)	56	
O15	Belmont Clinic	N/A	N/A	Health care centre Community or town centre uses
O16	Travellers Rest, Kenton Road	109	120	Hotel Public house Town centre uses
O17	Kenton Road Telephone Exchange	12	13	Town centre uses Community uses
O18	Wolstenholme	Net 25 C2 units (specialist older person housing)	28	
O19	Marsh Lane Gas Holders	70	77	
O20	Canons Park Station Carpark	26	29	Car parking
O21	Anmer Lodge	141	141	Town centre uses including supermarket (1,600 sqm) Car parking
O22	Stanmore Station Carpark	183	199	Car parking

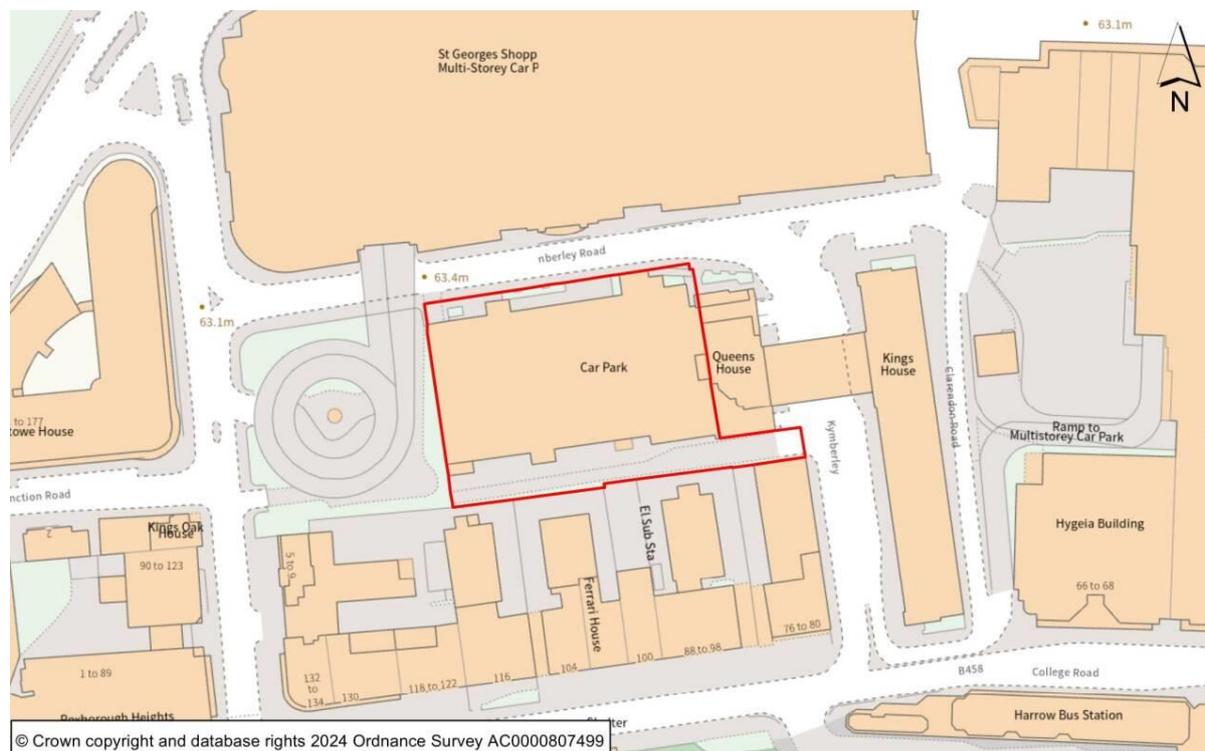
## Housing trajectory

11.22 Allocated sites create potential capacity for 8,882 dwellings, of which 6,974 are in the Opportunity Area and 1,902 outside of it. The breakdown of this capacity into time periods, as well as the other elements of the housing trajectory / supply pipeline, are shown in the following table.

Category		Past completions (19/20 – 23/24)	Pre-adoption (24/25 – 25/26)	Years 1-5 (26/27 -30/31)	Years 6 – 10 (31/32 – 35/36)	Years 11 – 15 (36/37 – 40/41)	Total
Surplus housing delivered between 19/20 – 20/21		454					454
Completions 21/22 – 23/24	Opp. Area	1,464					1,464
	Outside Opp. Area	460					460
	<i>Total</i>	1,924					1,924
Under construction	Opp. Area		365	257			622
	Outside Opp. Area		357	74			431
	<i>Total</i>		722	331			1,053
Permissions or legal agreements	Opp. Area		17	100			117
	Outside Opp. Area		92	330			422
	<i>Total</i>		109	430			539
Non-conventional supply	Opp. Area		5	1	0		
	Outside Opp. Area		58	-68	0		
	<i>Total</i>		63	-67	0		
Small sites windfall				375	1,875	1,875	4,125
Allocations	Opp. Area		869	2,992	2,333	780	6,974
	Outside Opp. Area			466	1,211	231	1,908
	<i>Total</i>		869	3,458	3,544	1,011	8,882
<b>Total</b>	<b>Opp. area</b>	<b>1,633</b>	<b>1,256</b>	<b>3,350</b>	<b>2,333</b>	<b>780</b>	<b>9,352</b>
	<b>Outside Opp. Area</b>	<b>745</b>	<b>507</b>	<b>802</b>	<b>1,211</b>	<b>231</b>	<b>3,496</b>
	<b>Small sites</b>		<b>0</b>	<b>375</b>	<b>1,875</b>	<b>1,875</b>	<b>4,125</b>
	<b>Total</b>	<b>2,378</b>	<b>1,763</b>	<b>4,527</b>	<b>5,419</b>	<b>2,886</b>	<b>16,973</b>

## Detailed site allocations

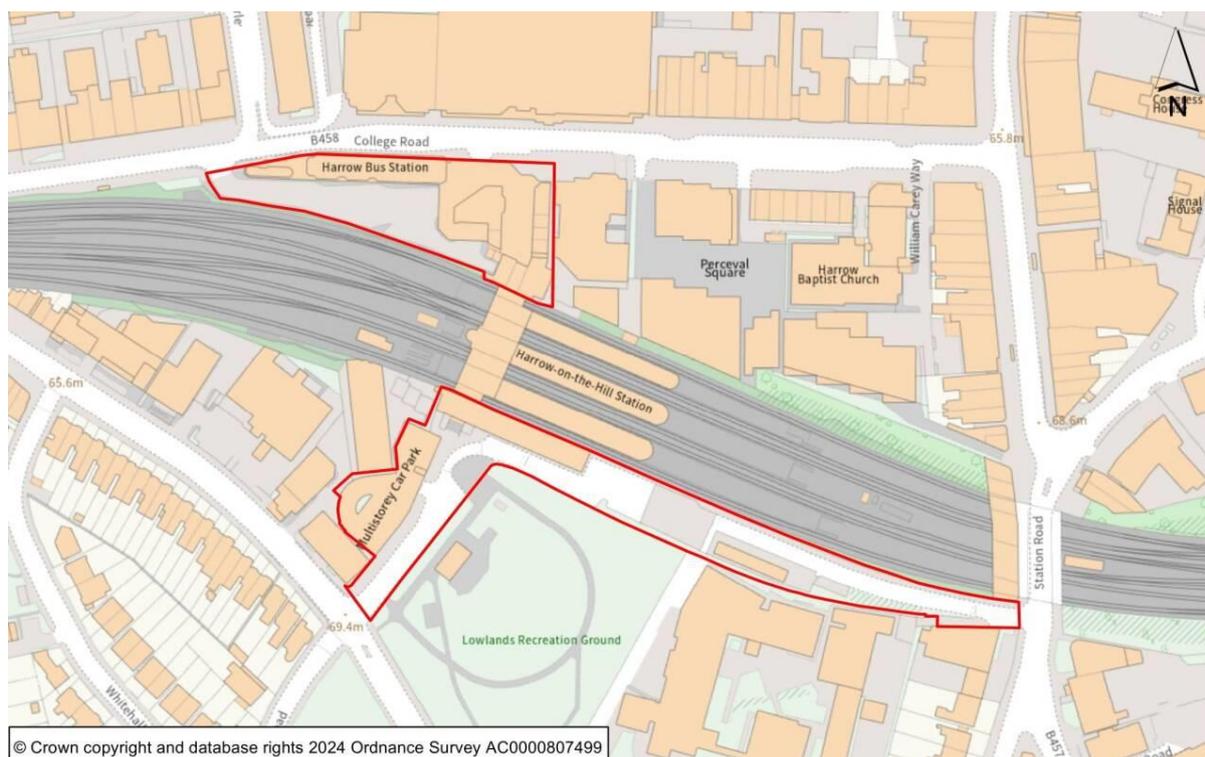
### Site OA1 – Queen’s House Carpark



Site information	
Address:	Multi-storey Car park, Kymberley Road, Harrow
Area:	0.32 ha
Description	Site consists of a five storey multi storey car park building facing onto the south side of Kymberley Road and opposite St George’s Shopping Centre. Immediately to the east is a large residential block, Queens House, which was converted from offices to flats. To the immediate west lies the five-storey car park entrance ramp to St George’s Shopping Centre.
Current use	Multi-level carpark
Ownership	Private
PTAL	6a
Site source	Call for sites
Relevant planning applications	N/A
Site allocation	
Site objective	Deliver a mixed-use development that provides high quality residential homes and appropriate town centre uses the Harrow Metropolitan Town Centre, while ensuring a satisfactory reprovision of car parking spaces. New development will improve the quality of the character of the area and enhance the public realm and local connectivity.
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Town centre appropriate use

	Reprovision of carparking spaces
Development timeframe	6-10 years
Indicative residential capacity	129 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Protected Views Restricted Corridors (Harrow View, Old Redding) Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) RAF Northolt Safeguarding Zone Tall Building Zone
<b>Development considerations</b>	
Requirements	Public realm improvements Car parking reprovision (public and private parking) Provision of publicly accessible viewing opportunities to St Mary's Church (Harrow on the Hill)
Development principles	<p>The site is located within the Harrow Metropolitan Town Centre and Harrow &amp; Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme.</p> <p>Active ground floor frontages must be provided to improve appearance from the public realm.</p> <p>Provide an improved pedestrian access / environment into the Harrow Town Centre Shopping Area and Harrow on the Hill Underground Station / Bus Station.</p> <p>Re-provision of appropriate levels of car parking (both in relation to supporting re-development of the site and wider public car parking provision to serve the town centre) must be demonstrated.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>The site is appropriate for tall building development, with consideration required to be taken in relation to the two protected viewing corridors which the site sits within.</p> <p>The Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development.</p>

**Site OA2 – Harrow on the Hill Underground and Bus Stations**

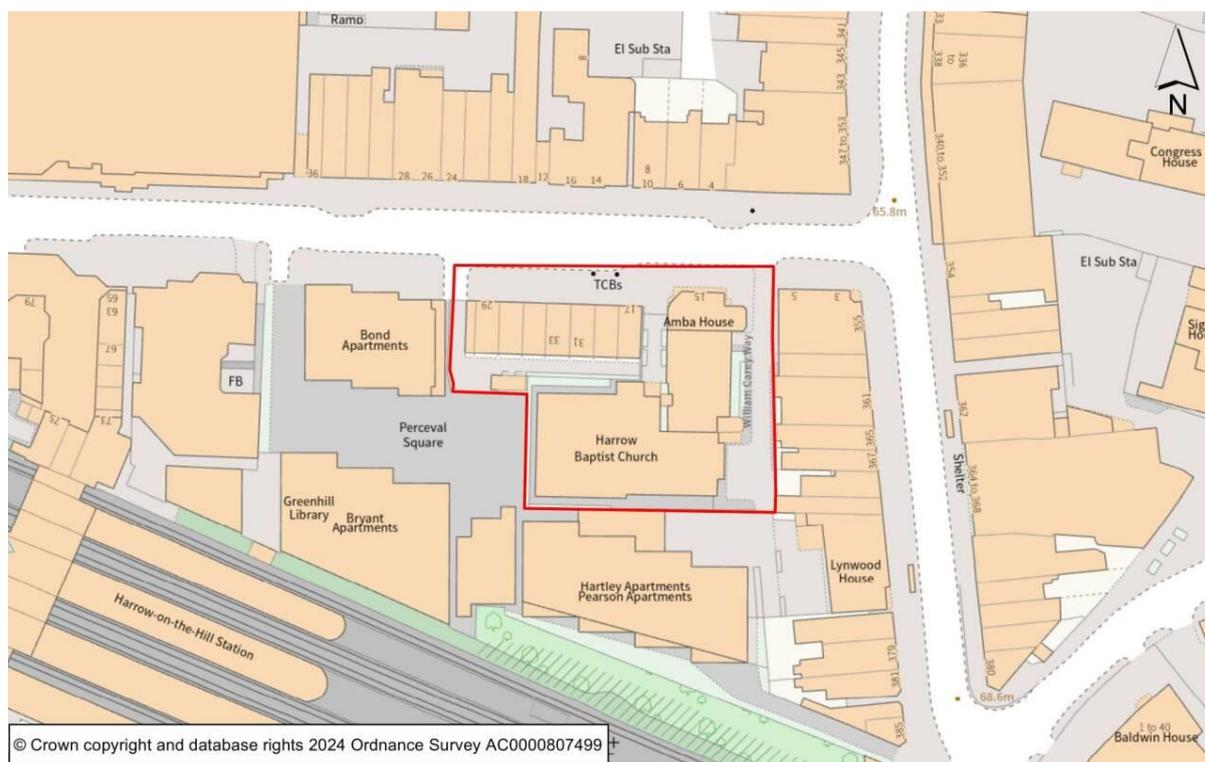


<b>Site information</b>	
Address:	Harrow on the Hill Underground and Bus Stations, Harrow HA1 1BY
Area:	1.10 ha
Description	Comprises the Harrow on the Hill bus station and Railway station, an office block (5 storey, excluding ground level bus station), commercial retail, hot food uses, a surface and multi storey car park. It is owned by TfL and is located within the Harrow Metropolitan Town Centre and Opportunity area. A number of sites within proximity to the site have been recently developed for high-density mixed-use development.
Current use	Train station Multi-level and surface level carpark Bus interchange Office building
Ownership	Public
PTAL	6b
Site source	Call for sites Allocation in Harrow & Wealdstone Area Action Plan 2013 (part)
Relevant planning applications	N/A
<b>Site allocation</b>	
Site objective	Redevelopment of the site to provide a landmark / wayfinding development that will deliver housing, town centre uses and an enhanced public transport hub. An enhanced transport hub must deliver greater accessibility (including step free access from the southern entrance of the train station) and ensure transportation capacity is met over the plan period.

Allocated use	<p><b>Leading land use</b> Residential Rail and bus transportation hub</p> <p><b>Supporting land use(s)</b> Appropriate town centre uses</p>
Development timeframe	Phased development in 6-10 and 11-15 year periods
Indicative residential capacity	363 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Protected Views Restricted Corridors (Gayton Road, Old Redding, Stanmore Country Park Extension Wood Farm & St Anns Rd) Protected Views Setting Corridors (Capital Ring Capital Ring, Football Lane, Gayton Road, The Grove, Old Redding, Stanmore Country Park Extension Wood Farm & Roxborough Road Bridge) Conservation Area (Roxborough Park and The Grove Conservation Area) adjoins site
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Tall Building Zone RAF Northolt Safeguarding Zone Metropolitan Open Land adjoins site
<b>Development considerations</b>	
Requirements	<p>Provision of step free access to the southern side of the Harrow on the Hill underground station.</p> <p>Enhanced public realm on the southern side of the Harrow on the Hill underground station and its interface with the Lowlands Recreation Ground.</p> <p>Improved bus station to provide for capacity over the plan period and proposed electrification of the bus fleet.</p> <p>Improved pedestrian access and environment from the Harrow on the Hill Underground Station into Harrow Town Centre</p> <p>Provision of publicly accessible viewing opportunities to St Mary's Church (Harrow on the Hill)</p>
Development principles	<p>The site is located within the Harrow Metropolitan Town Centre and Harrow &amp; Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme.</p> <p>New development must assist in enabling the delivery of an enhanced public transport hub. It should include provision of step free access (south side of station) and a more successful public realm to both sides of the station. Specifically, the access from the station into Harrow Town Centre is a poor environment, and measures shall be taken to improve this relationship. Public realm improvements should improve the connectivity from the station into the Harrow Town Centre, especially improving the nighttime environment to assist with safety of users (perceived or real).</p>

	<p>Redevelopment of the site must ensure a modernised bus station be delivered to ensure sufficient capacity over the plan period and includes the necessary infrastructure for the electrification of the network.</p> <p>To the south side of the station, public realm should be improved to enhance the connectivity of the entrance to the station with Lowlands Recreation Ground. An improved vehicle pick up / drop off point for station users to the south side will be supported.</p> <p>Ground floor elements of any development must be appropriate for the Metropolitan Town Centre and provide active frontages. Through residential development create overlooking / natural surveillance to both sides of the Station approach</p> <p>The site is appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary’s Church on Harrow on the Hill. New development must ensure that publicly accessible viewing opportunities are maintained. The site is also located within the RAF Northolt safeguarding zone.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>The Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development.</p>
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**Site OA3 – 15-29 College Road**



<b>Site information</b>	
Address:	15-29 College Road, Harrow HA1 1BA
Area:	0.38 ha
Description	The remainder of a previous site allocation that has been part-implemented, which is the development at 51 College Road which includes the Harrow Greenhill public library. The remainder of the site comprises Amba House (15 College Road), the Harrow Baptist Church and the three-story parade of shops to the west of Amba House that fronts onto College Road.
Current use	Office Some residential in a building that has undergone prior approval conversion from office Retail Church
Ownership	Private
PTAL	6b
Site source	Allocation in Harrow & Wealdstone Area Action Plan 2013
Relevant planning applications	Permission for additional two storeys at 31-33 College Road (P/0203/23/PRIOR)
<b>Site allocation</b>	
Site objective	Re-development of residential and town centre uses which improves the public realm fronting onto College Road and the interface with the public realm at the rear of the site

Allocated use	<p><b>Leading land use</b> Residential</p> <p><b>Supporting land use(s)</b> Town centre uses Public Realm Reprovision of place of worship / social infrastructure</p>
Development timeframe	11-15 years
Indicative residential capacity	86 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area
Heritage	<p>Locally Listed Buildings (361, 365, 367 &amp; 369 Station Road) adjoin site</p> <p>Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm)</p> <p>Protected Views Setting Corridors (The Grove &amp; Old Redding)</p>
Other	<p>Harrow &amp; Wealdstone Opportunity Area</p> <p>Town Centre Boundaries (Harrow Metropolitan Centre)</p> <p>Primary Shopping Area</p> <p>RAF Northolt Safeguarding Zone</p> <p>Tall Building Zone</p>
<b>Development considerations</b>	
Requirements	Provide improved public realm fronting onto College Road whilst improving the relationship and connectivity with the public realm to the rear (part of 51 College Road / Greenhill Library).
Development principles	<p>The site is located within the Harrow Metropolitan Town Centre and Harrow &amp; Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme.</p> <p>New development must relate to both the public realm fronting College Road, and also with the large-scale development to the south (adjacent to the railway) which formed part of the wider site allocation under the former AAP. Fronting College Road, any new development must provide for appropriate town uses with active frontages, and also activate the rear ground floor elevation fronting into the public realm located to the rear.</p> <p>To the rear of the site, the Greenhill Library is located as delivered under part of the wider (and previous allocation) site. Any new development must seek to improve access from College Road into the rear of the site to both utilise the public realm and access the public library. Opportunities to improve the public realm to the rear of (17 – 29 College Road) should be delivered to improve this area. Detail around servicing must be demonstrated.</p> <p>Residential development on the upper floors is appropriate and can provide natural surveillance of the public realm to the front and rear of the site.</p> <p>The design of any new development must take design queues from the existing major development to the rear of the site, to ensure consistency of design across the site.</p>

	<p>The site is appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary’s Church on Harrow on the Hill. New development must ensure that publicly accessible viewing opportunities are maintained. The site is also located within the RAF Northolt safeguarding zone.</p>
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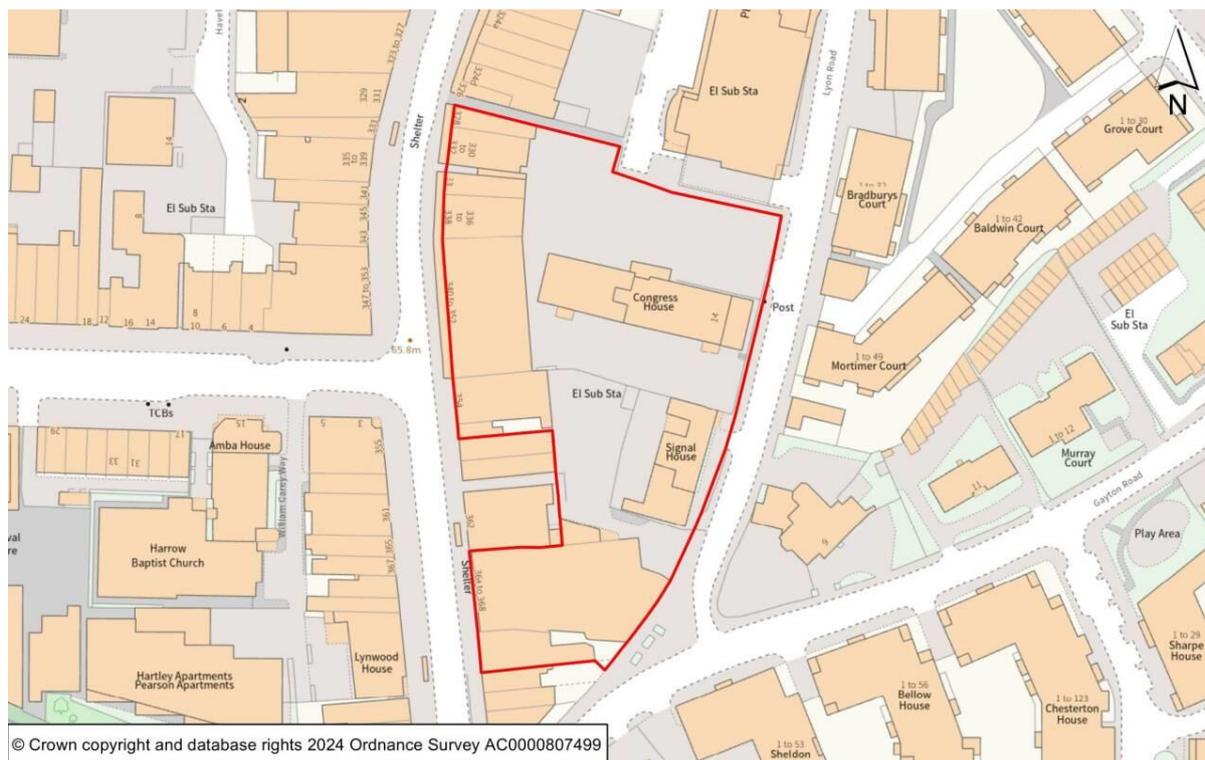
**Site OA4 – Havelock Place**



Site information	
Address:	Havelock Place, Harrow
Area:	0.95 ha
Description	A backland site located between St Anns Road and College Road which provides servicing facilities to premises on Station Road and to Marks & Spencer. A free-standing office block is located to the rear of the M&S service yard.
Current use	Shops fronting College Road / St Ann's Road Loading facilities at rear Office building
Ownership	Private
PTAL	6a, 6b
Site source	Call for sites Allocation in Harrow & Wealdstone Area Action Plan 2013
Relevant planning applications	
Site allocation	
Site objective	
Allocated use	<b>Leading land use</b> Residential Town centre uses <b>Supporting land use(s)</b> Public Realm
Development timeframe	1-5, 6-10 and 11-15 year periods

Indicative residential capacity	294 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Locally Listed Building (14 College Road) Locally Listed Buildings (329, 333, 335, 339, 341, 345, 347 & 351 Station Road) adjoin site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridors (The Grove, Old Redding)
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Primary Shopping Area RAF Northolt Safeguarding Zone Tall Building Zone - Part of Site
<b>Development considerations</b>	
Requirements	Public realm improvements as part of any redevelopment
Development principles	<p>The site is located within the Harrow Metropolitan Town Centre and Harrow &amp; Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme.</p> <p>The site is appropriate for residential development with appropriate town centre uses supporting this. Access to the site remains a challenge and new development will need to demonstrate appropriate access to the site including public realm improvements. The emerging Harrow Town Centre Masterplan will seek to set out appropriate routes / connections across the town centre, and new development on this site should respond positively to the guidance set out in the masterplan.</p> <p>The site is appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary's Church on Harrow on the Hill. New development must ensure that publicly accessible viewing opportunities are maintained.</p> <p>The Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development.</p> <p>Site assembly / comprehensive development should be pursued in accordance with Policy GR12 Site Allocations.</p>

**Site OA5 – Station Road East, Harrow**



Site information	
Address:	368-370 Station Road, Harrow 328-356 Station Road, Harrow Congress House, Lyon Road, Harrow Signal House Lyon Road, Harrow
Area:	0.88 ha
Description	The site is an assembly of multiple adjoining sites located between Station Road, Gayton Road and Lyon Road. Station Road is characterised by a two-storey parade of shops providing a range of retail and other town centre uses. The properties fronting onto Lyon Road are former office blocks, including Signal House and Congress House, and associating surface level car-parking. Pedestrian links present from Lyon Road through onto Station Road to connect to the town centre.
Current use	Mix of premises including: - Office buildings (Congress House, Signal House) - Retail premises fronting Station Road - Surface level carparking
Ownership	Private
PTAL	6a, 6b
Site source	Call for sites
Relevant planning applications	- Prior approval to convert Congress House to residential use (now lapsed) P/1870/13, P/3134/17/PRIOR, P/0509/20/PRIOR - Outline permission to add seventh floor to Congress House (P/4020/20) - Outline permission to add second and third floors to 342-352 Station Road (P/1111/21) Note these permissions have not been implemented

<b>Site allocation</b>	
Site objective	Redevelopment to provide a comprehensive and efficient use of land delivering housing and appropriate town centre uses.
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Town Centre uses
Development timeframe	6 - 10 years
Indicative residential capacity	171 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Locally Listed Building (14 College Road) Locally Listed Buildings (329, 333, 335, 339, 341, 345, 347 & 351 Station Road) adjoin site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridors (The Grove, Old Redding)
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Primary Shopping Area RAF Northolt Safeguarding Zone Tall Building Zone - Part of Site
<b>Development considerations</b>	
Requirements	Reprovision of appropriate retail floorspace with satisfactory servicing arrangements Improvements to public realm
Development principles	<p>The site is located within the Harrow Metropolitan Town Centre and Harrow &amp; Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme.</p> <p>It is desirable to bring forward the entire site as one comprehensive development, as this will ensure the most efficient use of land and therefore optimise development. However, it is recognised that if site assembly is not feasible then each site may be delivered piecemeal. Should it be demonstrated that a comprehensive development is not feasible, then each individual site must demonstrate that it would be able to be delivered without prejudicing other components of the overall site allocation.</p> <p>Ground floor uses along Lyon Road must respond to the character of the road and ensure a visually interesting facade onto the public realm. When addressing the Station Road frontage, consideration of both listed and non-listed assets should be undertaken with the retention of such assets prioritised where identified.</p> <p>Planning constraints include protected viewing corridors (set out above), however there is a viewing position directly outside of the development boundary, located on the corner of Gayton and Lyon Roads. This is a</p>

	<p>rather poor environment to enjoy views to St Mary’s Church on Harrow on the Hill, therefore opportunities to improve this location will be sought.</p> <p>The Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development.</p>
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**Site OA6 – Greenhill Way**

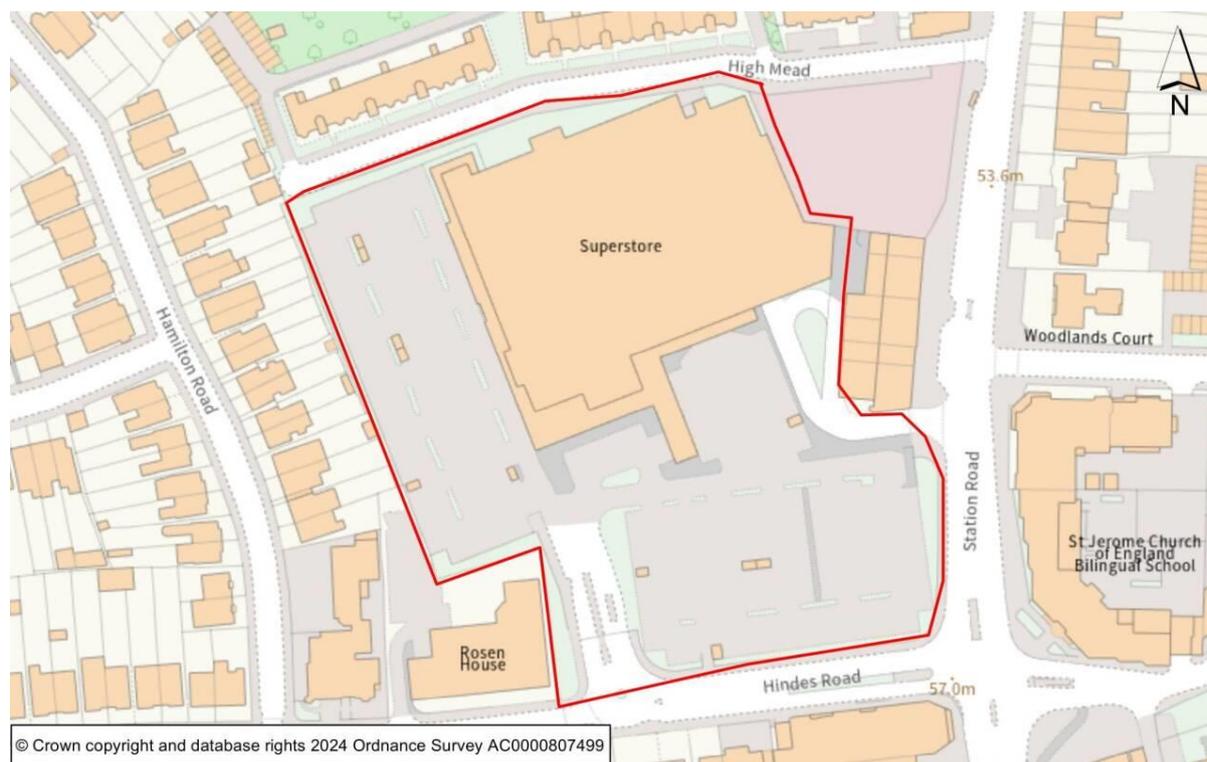


<b>Site information</b>	
Address:	South Car Park, Station Road, Harrow 229-245 Station Road, Harrow 269-287 Station Road, Harrow
Area:	1.84 ha
Description	The allocation comprises a number of adjoining sites in Harrow Town Centre, which includes the Council-owned Greenhill Way Carpark, the former Debenhams Site, a public house, and a parade of shops characterised as two and three storey properties.
Current use	Multiple uses including: - Large surface level carpark owned and operated by Council - Former Debenhams - Retail and public house facing Station Road
Ownership	Public (Council) - Greenhill Way Carpark Private - Other parcels
PTAL	6a
Site source	Call for sites (part of site) Allocation in Harrow & Wealdstone Area Action Plan 2013 (part of site)
Relevant planning applications	N/A
<b>Site allocation</b>	
Site objective	Comprehensive redevelopment of the site for a mixture of town centre, community / civic uses and residential uses that reflects the significant opportunity the site represents within Harrow Town Centre.

Allocated use	<p><b>Leading land use</b> Residential Town centre uses</p> <p><b>Supporting land use(s)</b> NHS Floorspace (subject to unmet need / delivery of floorspace on other allocated sites) Community/civic uses (including potential replacement leisure centre from Byron Quarter site) Public House Car parking Public Open Space</p>
Development timeframe	<p>6 – 10 years (individual sites) 10 – 15 years (comprehensive development / Site assembly)</p>
Indicative residential capacity	371 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area
Heritage	<p>Listed Buildings (Church of St John the Baptist, World War II Memorial, Granada Cinema) opposite site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridor (The Grove)</p>
Other	<p>Harrow &amp; Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Primary Shopping Area RAF Northolt Safeguarding Zone Tall Building Zone - Part of Site</p>
<b>Development considerations</b>	
Requirements	<p>Car parking provision to serve town centre / new development Improved public realm / Open Space provision Community infrastructure (Either replacement leisure centre and / or NHS floorspace) Town centre uses with active frontages Reprovision of public house</p>
Development principles	<p>The site is located within the Harrow Metropolitan Town Centre and Harrow &amp; Wealdstone Opportunity Area, and is an appropriate location for a major mixed use scheme.</p> <p>It is desirable to bring forward the entire site as one comprehensive development, as this will ensure the most efficient use of land and therefore optimise development. However, it is recognised that if site assembly is not feasible then each site may be delivered piecemeal. Should it be demonstrated that a comprehensive development is not feasible, then each individual site must demonstrate that it would be able to be delivered without prejudicing other components of the overall site allocation.</p> <p>Central Harrow is identified (within the Harrow Infrastructure Delivery Plan) as having a need for floorspace for the National Health Service, in particular GP floorspace or related use. This site or part of this site must look to deliver floorspace for this use, having regard to identified need at</p>

	<p>the time and the delivery of NHS floorspace on other allocated sites. The provision of NHS floorspace will be determined on a case-by-case basis on allocated sites across the Harrow &amp; Wealdstone Opportunity Area, and in conjunction with the Harrow Infrastructure Delivery Plan.</p> <p>Harrow Council Leisure Centre located at Byron Park (Wealdstone) is potentially being replaced as part of the redevelopment of Site Allocation OA14 (Byron Quarter) due to its age and condition. The Council is in the process of confirming which site within the Borough is most feasible and suitable for its replacement. Greenhill Way Carpark provides a potential site for the replacement leisure centre, and therefore flexibility is built into the site allocation in the event that Greenhill Way Carpark is considered feasible and confirmed as the preferred site.</p> <p>Carparking will continue to be required at a level that is supportive of both any new development and for the Harrow Metropolitan Town Centre. New development will have to demonstrate an appropriate level of carparking.</p> <p>The existing site (particularly the Greenhill Way Carpark) is a poor-quality urban environment and new development will need to improve this relationship. Where the allocation faces onto Station Road, appropriate town uses with active frontages must be provided. When addressing the Station Road frontage, consideration of both designated and non-designated assets should be undertaken with the retention of such heritage assets prioritised where identified. The re-provision of a Public House within the Station Road frontage must be delivered. Comprehensive development of the site should seek to deliver high quality open space available for both future occupiers and the wider town centre.</p> <p>The Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024) and (emerging) Harrow Town Centre Masterplan will provide further guidance on new development.</p>
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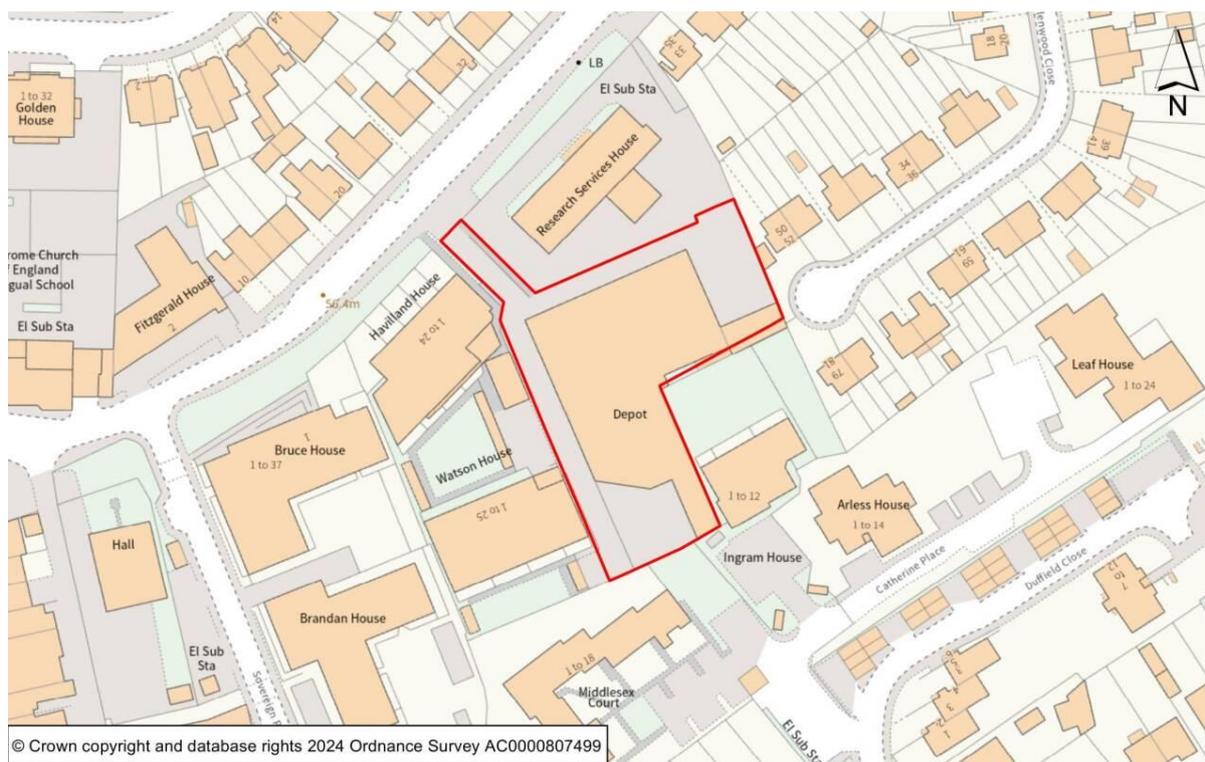
**Site OA7 – Tesco Station Road**



<b>Site information</b>	
Address:	Tesco Superstore, Station Road Harrow HA1 2TU
Area:	2.28 ha
Description	A large site in private single ownership at the corner of Station Road and Hinds Road, currently occupied by a Tesco superstore and associated surface level carpark. The recently completed Safari cinema re-development adjoins the northeast corner of the site and land to the north and east is mainly in residential use. The site is located at the northern edge of the Harrow Town Centre and roughly halfway between Harrow on the Hill and Harrow and Wealdstone stations.
Current use	Supermarket and surface level carpark
Ownership	Private
PTAL	3-5
Site source	Call for sites Allocation in Harrow & Wealdstone Area Action Plan 2013
Relevant planning applications	- Application for phased redevelopment (PL/0693/24) – yet to be determined (November 2024)
<b>Site allocation</b>	
Site objective	Redevelopment of the site for a mixed-use scheme that better utilises this strategic site in the Harrow and Wealdstone Opportunity Area, including re-provision of the existing superstore.
Allocated use	<b>Leading land use</b> Supermarket Residential
Development timeframe	Phased development in 1-5 year and 6-10 year periods

Indicative residential capacity	500 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Locally Listed Building (Safari Cinema) adjoins site Protected view corridor (Wood Farm protected view)
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Harrow Metropolitan Centre) Primary Shopping Area RAF Northolt Safeguarding Zone Tall Building Zone - Part of Site
<b>Development considerations</b>	
Requirements	Re-provide the existing supermarket and sufficient associated parking. Development phased to ensure the supermarket can remain open during development. Improved public domain along Station Road and Hindes Road
Development principles	This site's location and large size make it a strategic site for development which can deliver a large amount of housing in a mixed-use scheme.  Improved frontage to Hindes Road, including the widening of the footway at junction between Hindes Road and Station Road, and the greening of Hindes Road reflecting the importance of the road within the Green Grid.  Improve pedestrian access to the site and pedestrian links between the site and Harrow town centre, including use of the car park for linked trips.  The site is located within a tall building zone and therefore tall buildings may be appropriate on the site. The arrangements of any tall buildings must respond positively within the site, and tie in appropriately to the lower density and scale residential properties that adjoin the site.

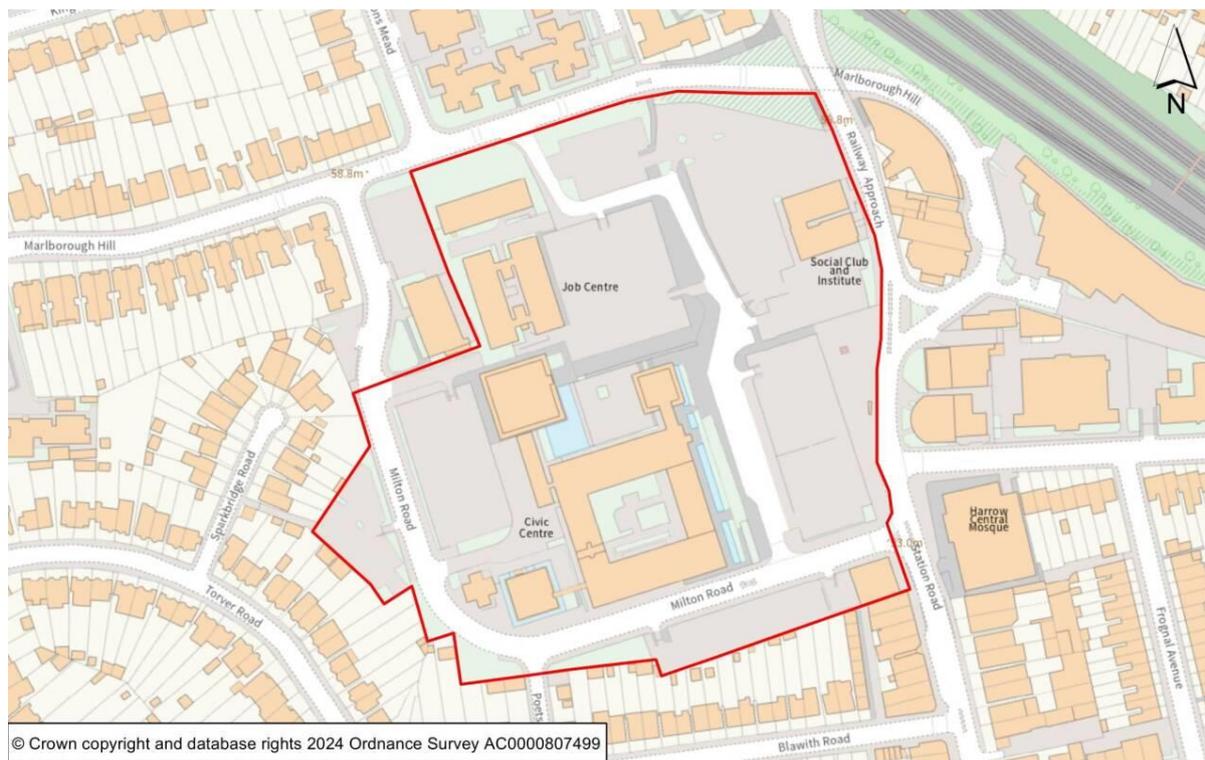
**Site OA8 – Former Royal Mail Postal Delivery Office, Elmgrove Road**



Site information	
Address:	Royal Mail Harrow Postal Delivery Office, Elmgrove Road, Harrow HA1 2ED
Area:	2.28 ha
Description	An irregular parcel with access from Elmgrove Road. The site comprises existing single and two storey brick-built buildings, which were previously occupied by the Royal Mail (vacated in 2019). They are currently in commercial / industrial use, and there are also areas of parking on the eastern and southern sides. There are interfaces on several sides to residential uses (generally flats) with multiple sites having been redeveloped or had their use changed to residential. There are some industrial/warehouse uses in operation nearby in an LSIS precinct, but not adjoining the site.
Current use	Currently in employment use, formerly a sorting office for Royal Mail
Ownership	Private
PTAL	2
Site source	Call for sites
Relevant planning applications	<ul style="list-style-type: none"> <li>- Multiple refused applications for residential development on site (P/5049/19, P/4238/20, P/4527/20)</li> <li>- Permission for change of use from sorting office to B8 and commercial (P/1980/22)</li> </ul>
Site allocation	
Site objective	Redevelopment to retain and enhance industrial/employment floorspace on the site with potential for co-location with residential on the upper floors

Allocated use	<b>Leading land use</b> Industrial Residential
Development timeframe	6 - 10 years
Indicative residential capacity	18 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area
Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	Harrow & Wealdstone Opportunity Area RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Reprovision of appropriate industrial employment space on the ground floor of development.
Development principles	<p>Given this site's location within the Harrow &amp; Wealdstone opportunity area and near the Harrow Town Centre it is suitable for a modest scale residential/industrial co-location development.</p> <p>Non-designated industrial sites make an important contribution to employment and industrial land supply in Harrow and London. Given the former and existing use of this site, industrial floorspace should be provided on the ground floor of any development. Floorspace on the ground floor required for any residential development must be kept to the minimum amount required to facilitate such use, to ensure that a sufficient provision of appropriate employment land is provided on site.</p> <p>Access to the site is constrained. Proposals will need to demonstrate how access to and from the site for industrial use can be provided, and how the impact of this on residential amenity can be mitigated.</p> <p>The irregular shape of the site means that development could impact on the amenity of surrounding properties. This will need to be considered in the design process.</p>

**Site OA9 – Poet's Corner & Milton Road**



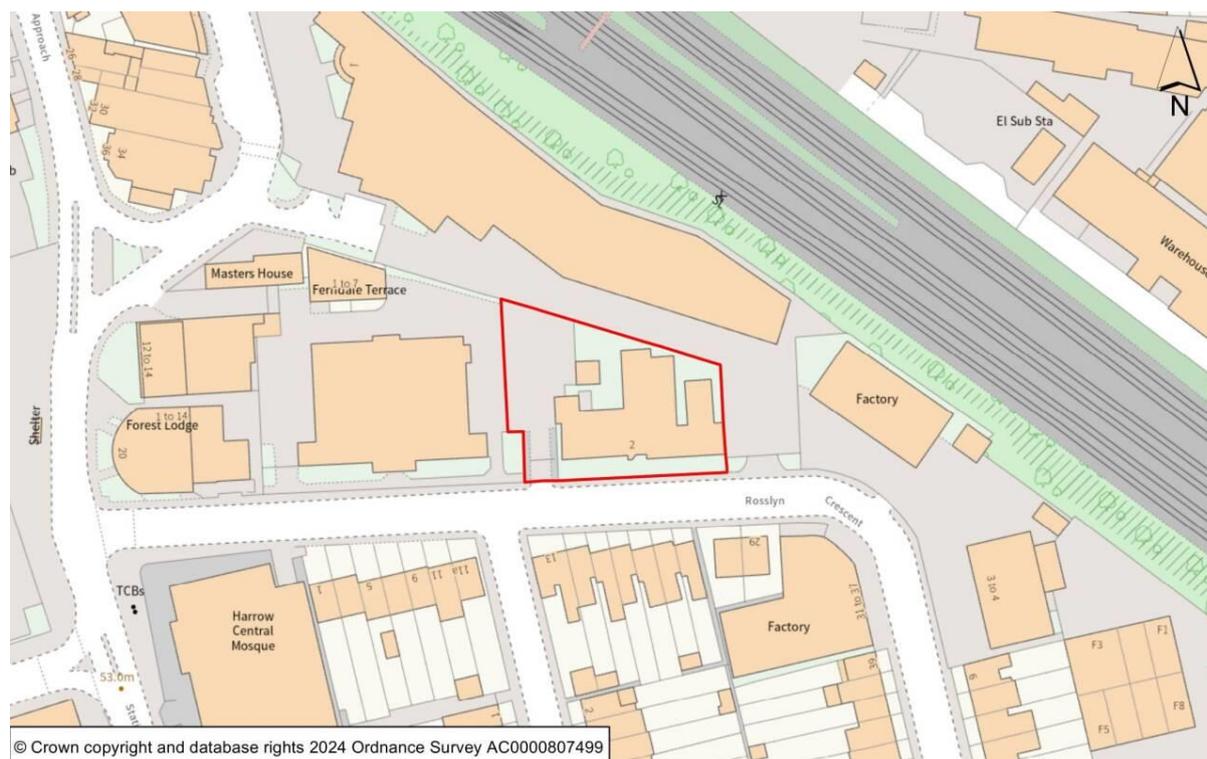
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Site information	
Address:	Civic Centre, Station Road, Harrow
Area:	4.46 ha
Description	<p>Former Council Civic Centre site fronting Station Road and in close proximity to Harrow &amp; Wealdstone Station. There are large carparks on the eastern half of the site and several existing buildings of up to 6 storeys distributed across the site. A former social club fronts part of Station Road.</p> <p>This site is owned by Council and is being promoted for development as part of the Harrow Strategic Development Partnership. Its large size and location make it a highly strategic site with potential to provide a scheme with a range of uses.</p>
Current use	<ul style="list-style-type: none"> <li>- Currently vacant former civic centre</li> <li>- Surface level carpark (associated with the former civic centre)</li> <li>- Community uses</li> </ul>
Ownership	Public (Council)
PTAL	4-5
Site source	Allocation in Harrow and Wealdstone Area Action Plan (2013) Harrow Strategic Development Partnership site
Relevant planning applications	<ul style="list-style-type: none"> <li>- Permission for development on small parcel in southern part of site (P/4477/21)</li> </ul>
Site allocation	
Site objective	Comprehensive mixed-use site redevelopment creating a permeable new precinct with a high-quality public domain in the heart of the Harrow & Wealdstone Opportunity Area
Allocated use	<b>Leading land use</b> Residential

	<p><b>Supporting land use(s)</b></p> <p>Appropriate town centre uses to serve the development</p> <p>NHS Floorspace (having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)</p> <p>Community floorspace</p> <p>Open Space provision</p>
Development timeframe	1 - 5 and 6 - 10 year periods
Indicative residential capacity	1139 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Protected Views Setting Corridors (Stanmore Country Park Extension Wood Farm, Roxborough Road Bridge)
Other	Designated Open Space - part of site Harrow & Wealdstone Opportunity Area Tall Building Zone RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	<p>Mix of housing sizes and tenures</p> <p>Pedestrian and cycling route through site linking Station Road to Harrow &amp; Wealdstone Station (western entrance)</p> <p>Shared open space</p> <p>Streetscape and road crossing improvements</p> <p>NHS Floorspace (having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)</p>
Development principles	<p>The large size and location of this site make it a highly strategic development site suitable for a scheme containing a range of uses.</p> <p>Development should be planned around a new, generous, and convenient pedestrian and cycling public green route that runs through the site, making an important link between the Station Road and Harrow and Wealdstone Station. Consider retention of the existing mature plane trees and creation of a line of sight between the new public square and the Station. The creation of open space should be available to future occupiers of the site and the wider area.</p> <p>Active ground floor frontages should front the new pedestrian corridor on both sides, forming an extension of the Station Road high street.</p> <p>NHS floorspace should be provided onsite to assist in meeting the need for GP Surgery and other health care floorspace within Central Harrow. The provision of NHS floorspace will be determined on a case-by-case basis on allocated sites across the Harrow &amp; Wealdstone Opportunity Area, and in conjunction with the Harrow Infrastructure Delivery Plan</p> <p>Development should make the site permeable including new street access layout, and should improve the streetscape environment along the remainder of Station Road</p> <p>A large amount of housing is likely to be provided, making it important that this housing is aligned with local housing need. Provision of a range of</p>

	<p>housing sizes, types and tenure on the site should be delivered to help foster a mixed &amp; inclusive community. An element of self-build housing could be incorporated into the site but would need to ensure efficient and optimal use of this strategically important site.</p> <p>The site is located within a tall building zone and therefore tall buildings may be appropriate on the site. The arrangements of any tall buildings must respond positively within the site.</p>
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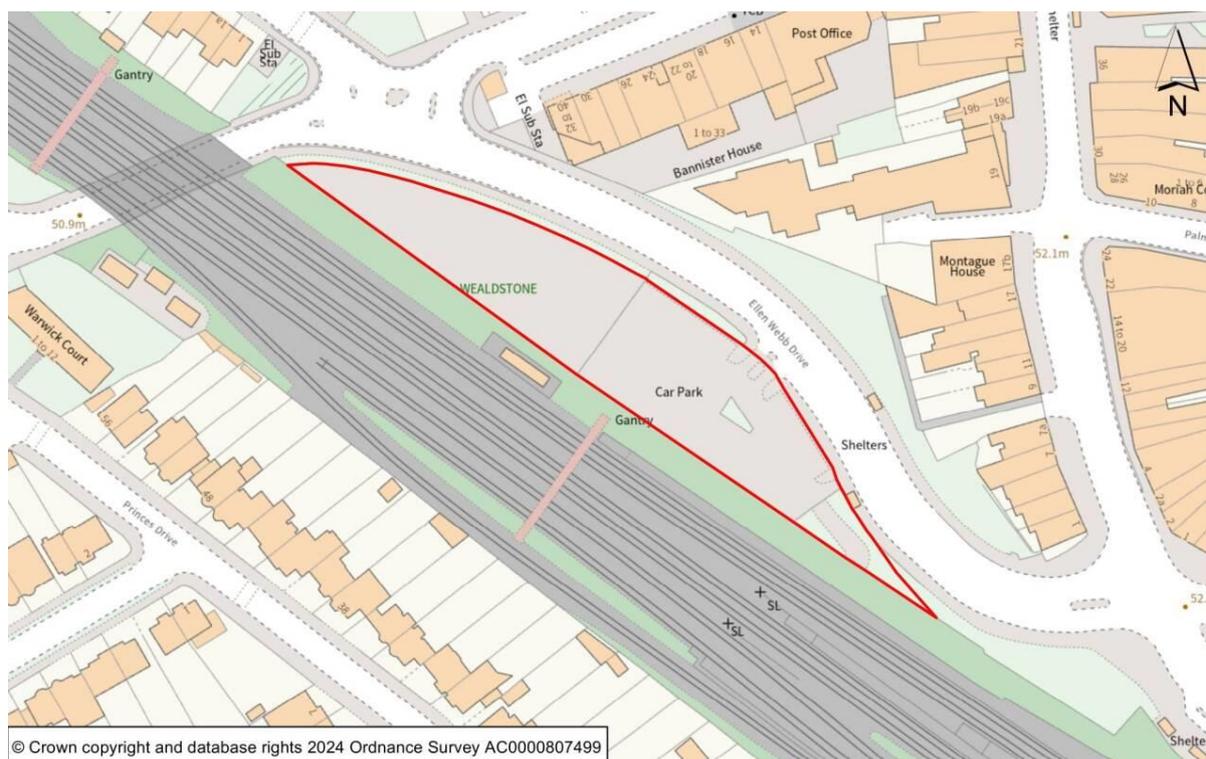
**Site OA10 – Wealdstone Probation Office**



Site information	
Address:	Harrow Probation Office, Rosslyn Crescent, Harrow HA1 2SU
Area:	0.17 ha
Description	This site is currently used as a Parole office (C2a use). It is to the south-east of the Wealdstone Town Centre (other side of train line) and Harrow & Wealdstone Station. Immediately to the east is a heritage listed former courthouse, now a religious temple. To the north and east are industrial uses, and the area to the south is predominately occupied by terraced housing.
Current use	Vacant, former probation office
Ownership	Public (Council)
PTAL	5
Site source	Call for sites
Relevant planning applications	
Site allocation	
Site objective	Deliver a high-quality mixed-use development to provide hostel accommodation and reprovision of appropriate employment use.
Allocated use	<b>Leading land use</b> Hostel accommodation Replacement employment (industrial or related) use
Development timeframe	1 - 5 years
Indicative residential capacity	70 C2 Residential Institutions sui generis units

<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Listed Buildings (Magistrates Court) adjoins site Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm)
Other	Locally Significant Industrial Sites Harrow & Wealdstone Opportunity Area RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Re-provision of appropriate industrial floorspace Delivery of hostel accommodation.
Development principles	<p>A mixed-use scheme is appropriate which provides hostel style accommodation and also the re-provision of employment use that is appropriate for a Locally Strategic Industrial Site.</p> <p>Any form of residential development on the site must address the agent of change, both for the re-provided floorspace on site, but also more specifically in relation to the ongoing successful operation of the adjacent industrial estate. New development must ensure a successful design interface between new residential development and the industrial estate.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>Reprovision of industrial floorspace must be of a use that is of an appropriate industrial (or related) use and detailed design to ensure future occupiers of the hostel have a high quality of residential amenity.</p>

**Site OA11 – Carpark Ellen Webb Drive**

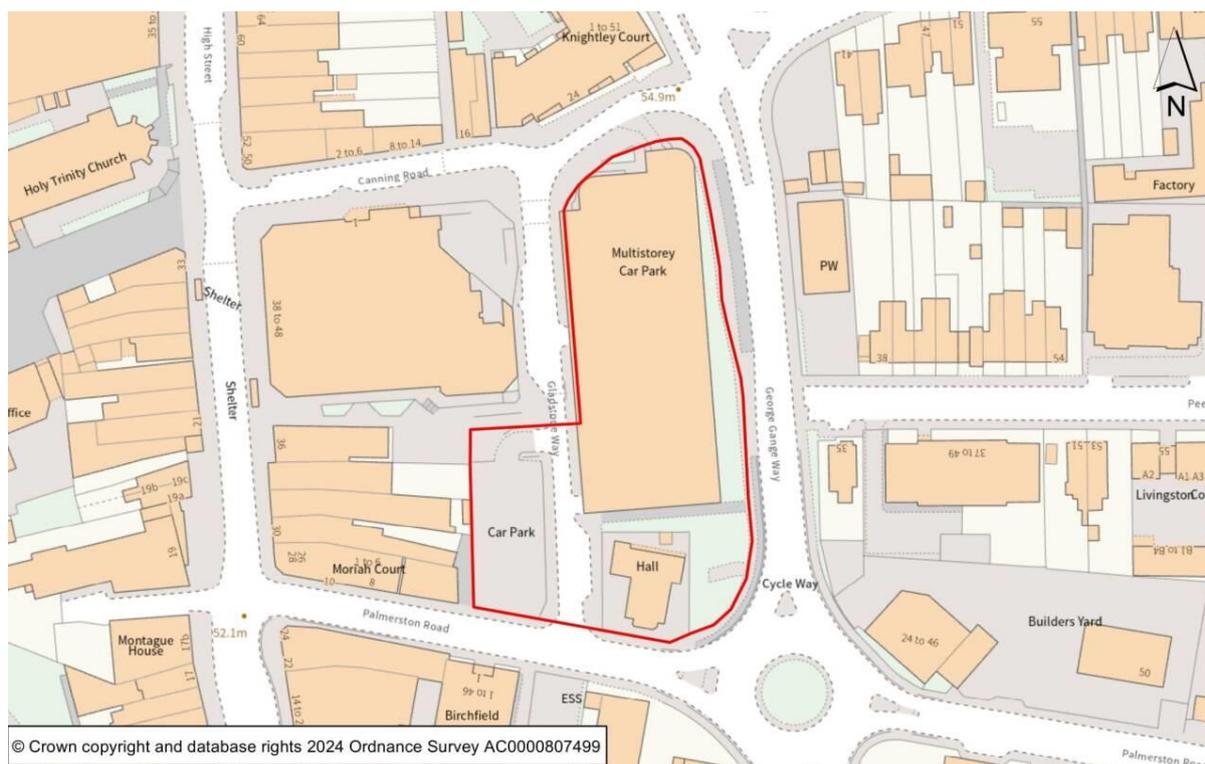


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Site information	
Address:	Car park, Ellen Webb Drive, Wealdstone
Area:	0.32 ha
Description	Narrow semi-oval shaped parcel between Ellen Webb Drive and the railway line in Wealdstone. The site was formerly used as a carpark associated with Harrow & Wealdstone Station. Part of the site is still used, but part is now vacant. This site is located very near Harrow & Wealdstone Station with good connections to Central London and elsewhere, and is within the Wealdstone District Centre, making it suitable for a mixed-use scheme including residential or town centre uses.
Current use	Partly carpark, partly unused former carpark
Ownership	Public
PTAL	5-6a
Site source	Call for sites Allocation in Harrow and Wealdstone Area Action Plan (2013) (part)
Relevant applications	
Site allocation	
Site objective	Major mixed-use development to provide a residential or hotel led development with appropriate town centre use/s at ground floor and improvements to the public realm.
Allocated use	<b>Leading land use</b> Residential Hotel <b>Supporting land use(s)</b> Appropriate town centre uses Reprovision of car parking spaces

Development timeframe	6 - 10 years
Indicative capacity	183 C3 dwelling houses / units or equivalent, or 282 C1 Hotel rooms
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Protected Views Setting Corridor (Roxborough Road Bridge)
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Wealdstone) RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Appropriate car parking provision Improvement to public realm, specifically towards Harrow & Wealdstone Station and Wealdstone High Street. Drainage and flood risk improvements, specifically to the western end of the site and within the adjoining public realm.
Development principles	<p>The site is an irregular and narrow shaped site with some notable constraints that need to be appropriately address in the design and in delivery of any new development. New development must respond to the railway line (Network Rail / London underground and overground) to the rear (south) of the site, and to the public realm linking the site to Wealdstone High Street and the Harrow &amp; Wealdstone Station.</p> <p>Carparking will continue to be required at a level that is supportive of both any new development and for the Wealdstone District Town Centre and Harrow and Wealdstone Station. New development will have to demonstrate an appropriate level of carparking. Carparking on site must ensure an active frontage onto Ellen Webb Drive is provided, whereby avoiding a blank and inactive frontage.</p> <p>New development must provide public realm improvements. The western part of the site is located within a flood zone, which continues into the public highway further to the west. Improvements on site should be explored to reduce flood risk on site and within the wider area. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>Furthermore, opportunities to improve the cycle and pedestrian environment under the Headstone Drive railway underpass should be delivered. To the east and south east of the site is both Wealdstone High Street and Harrow &amp; Wealdstone Station respectively. Public realm improvements should be delivered to improve the urban environment between the site and both of these destinations.</p> <p>Any form of residential development on site must ensure high quality of residential amenity, specifically addressing impacts from the railway line to the south.</p> <p>The site is appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary's Church on Harrow on the Hill.</p>

**Site OA12 – Peel Road**



<b>Site information</b>	
Address:	Peel House Car Park, 4 Gladstone Way, Wealdstone International Siddhashram Shakti Centre, 22 Palmerston Road, Harrow
Area:	0.51 ha
Description	A multi-level carpark, place of worship and surface level carpark located on the eastern side of the Wealdstone District Centre. Most of the site is owned by Council, and the site is being brought forward through the Harrow Strategic Development Partnership.
Current use	- Multi-storey carpark - Religious temple - Surface level carpark
Ownership	Public (Council) - Most of site Private - religious temple in the south-eastern portion of site
PTAL	5-6a
Site source	Harrow Strategic Development Partnership site
Relevant planning applications	
<b>Site allocation</b>	
Site objective	Site redevelopment which provides housing and appropriate town centre uses within Wealdstone Town Centre, and which improves connections between the High Street and Byron Park, through the site / along Peel Road.
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Car parking Place of worship

	Civic or community uses NHS Floorspace (having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)
Development timeframe	6 - 10 and 11 - 15 years
Indicative residential capacity	207 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area
Heritage	Protected Views Setting Corridors (Stanmore Country Park Extension Wood Farm, Roxborough Road Bridge)
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Wealdstone) Primary Shopping Area Tall Building Zone RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Reprovision of place of worship Improved public domain and access-way through site Reprovision of appropriate level of car parking NHS Floorspace (having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)
Development principles	<p>This site is located in an accessible location within the Wealdstone Town Centre, and is suitable for a mixed use scheme including a substantial level of residential.</p> <p>Carparking will continue to be required at a level that is supportive of both any new development and for the Wealdstone District Centre. New development will have to demonstrate an appropriate level of carparking.</p> <p>Access to Byron Park from the Wealdstone Town Centre along Peel Road is currently impeded by the existing multi-level carpark. Redevelopment of the site should provide an improved and legible public access route. The other site interfaces should also be improved to improve the overall quality of the public realm and the area generally in this part of the Wealdstone Town Centre.</p> <p>Appropriately designed ground floor frontages must be provided, avoiding any blank and inactive frontages onto the pedestrian footpaths adjacent to the site.</p> <p>NHS floorspace should be provided onsite to assist in meeting the need for GP Surgery and other health care floorspace within the Harrow and Wealdstone Opportunity Area. The provision of NHS floorspace will be determined on a case-by-case basis on allocated sites across the Harrow &amp; Wealdstone Opportunity Area, and in conjunction with the Harrow Infrastructure Delivery Plan.</p> <p>The site is located within a Tall building zone and any such development should come forward in conformity with the relevant policy and the Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024).</p>

**Site OA13 – Travis Perkins Wealdstone**



Site information	
Address:	24 - 68 Palmerston Road, Harrow
Area:	0.43 ha
Description	The site includes two adjoining sites that are in industrial use. The site is located in a transitional area, with tall buildings located to the south on the opposite side of Palmerston Road, and low-rise residential to the north and east. George Gange Way forms the western boundary to the site, and separates the site from the Wealdstone Town Centre.
Current use	- Current Travis Perkins builders merchant - An adjacent car yard
Ownership	Private
PTAL	5
Site source	Call for sites (part of site) Allocation in Harrow & Wealdstone Area Action Plan 2013 (part of site)
Relevant planning applications	
Site allocation	
Site objective	To deliver a mixed-use development that prioritises the reprovision of an appropriate typology and quantum of industrial type floorspace.
Allocated use	<b>Leading land use</b> Industrial (or related) <b>Supporting land use(s)</b> Residential
Development timeframe	6 - 10 years

Indicative residential capacity	36 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone 2 - Part of site
Heritage	Protected Views Setting Corridors (Stanmore Country Park Extension Wood Farm, Roxborough Road Bridge)
Other	Locally Significant Industrial Sites Harrow & Wealdstone Opportunity Area Tall Building Zone RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Reprovision of Industrial floorspace Improvement of the pedestrian environment along the frontage towards Wealdstone High Street.
Development principles	<p>The allocation covers a number of adjoining sites, and in order to deliver an optimised scheme, site assembly will be required. The Council will support site assembly of the properties noted within the allocation, and give due consideration to a Compulsory Purchase Order where appropriate.</p> <p>The site is located within a Locally Significant Industrial Site (LSIS) which provides floorspace and premises for industrial land to be carried out within the Borough. Any new development must prioritise the reprovision of appropriate industrial floorspace on site, with any enabling residential element ensuring minimal reduction of the employment offer. The agent of change principle must be applied as part of ensuring high quality residential amenity is provided for future occupiers.</p> <p>Floorspace on the ground floor required for any enabling residential development must be kept to the minimum amount required to facilitate such use, to ensure that a sufficient provision of appropriate employment land is provided on site</p> <p>Improvements to the public realm should be secured, specifically in terms of pedestrian experience towards Wealdstone Town centre.</p> <p>Care must be taken to ensure that new development responds to its context, with particular care to the lower density residential properties in the vicinity of the site.</p> <p>Part of the site is subject to flood risk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>The site is appropriate for some tall building development with consideration to the Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024) taken when developing proposals for the site.</p>

**Site OA14 – Byron Quarter**



<b>Site information</b>	
Address:	Harrow Leisure Centre, Christchurch Avenue, Kenton
Area:	5.74 ha
Description	A large Council-owned site containing a range of leisure and community uses including the Harrow Leisure Centre and carpark, a bowling club, gymnastics centre, skate park and vacant former driving centre. Byron Park open space lies directly to the north. The Belmont Trail forms the southeast boundary and suburban residential is located to the south across Christchurch Avenue.
Current use	Harrow Leisure Centre and carparking Range of other community and leisure uses Former driving centre at eastern end of site now vacant
Ownership	Public (Council)
PTAL	1b - 4
Site source	Allocation in Harrow and Wealdstone Area Action Plan (2013) Harrow Strategic Development Partnership site
Relevant planning applications	
<b>Site allocation</b>	
Site objective	Residential-led redevelopment of the site funding renewal or relocation of the Harrow Leisure Centre and improving interfaces with Byron Park.
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Leisure and community uses Car-parking

	NHS floorspace (having regard to identified need at the time and the delivery of floorspace on other allocated sites)
Development timeframe	1 - 5 and 6 - 10 years
Indicative residential capacity	638 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm) Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm) Locally Listed Building (Byron Recreation Ground Skateboard Park)
Other	Designated Open Space Harrow & Wealdstone Opportunity Area Sites of Importance for Nature Conservation (The Rattler including Belmont Nature Walk) adjoins site Tall Building Zone RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Refurbishment or replacement (on-site or other agreed site) of Leisure Centre Car-parking re-provision. Pedestrian and cycling routes NHS Floorspace (having regard to identified need at the time and the delivery of NHS floorspace on other allocated sites)
Development principles	<p>This is one of the largest sites within the Harrow and Wealdstone Opportunity Area, making it a strategic site for development. It is suitable for housing, leisure and community uses. Development of the site is likely to be phased, with earlier phases ensuring later phases are not prejudiced.</p> <p>Continuity of leisure use and recreation services should be addressed through development phasing. However, the Council is currently undertaking feasibility studies as to where any replacement leisure facility should be located within the Borough. Flexibility is therefore built into this allocation (along with other potential sites) for this provision.</p> <p>The bowls club and gymnastics centre are in long leases and along with the skate park are important and well-used community assets. They should be retained on site, or provision made for them elsewhere as part of development.</p> <p>Sufficient car parking re-provision should be made within new development to service the Leisure Centre (if retained or re-provided on-site) and other leisure and community uses.</p> <p>A significant amount of housing is likely to be provided, making it important that this housing is aligned with local housing need. Provision of a range of housing sizes, types and tenures on the site should be delivered to help foster a mixed and balanced community.</p>

	<p>Development should engage with the edge of Byron Park and provide an improved interface</p> <p>Safe cycle/pedestrian access across new development areas to be created to encourage access/promotion of Belmont Trail/Harrow Green Grid.</p> <p>NHS floorspace should be provided onsite to assist in meeting the need for GP Surgery and other health care floorspace within the Harrow and Wealdstone Opportunity Area. The provision of NHS floorspace will be determined on a case-by-case basis on allocated sites across the Harrow &amp; Wealdstone Opportunity Area, and in conjunction with the Harrow Infrastructure Delivery Plan.</p> <p>Development should minimise impacts on the Belmont Trail and Wealdstone Cemetery, which are part of a Site of Interest for Nature Conservation and which adjoin this site on its eastern side.</p> <p>The site is appropriate for some tall building development with consideration to the Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024) taken when developing proposals for the site.</p>
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**Site OA15 – Iceland Wealdstone**



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<b>Site information</b>	
Address:	83-85 High Street, Wealdstone
Area:	0.22 ha
Description	Rectangular parcel running from Wealdstone High Street one block west to Wolseley Road, with supermarket fronting High Street and carpark access at the rear onto Wolseley Road.
Current use	Supermarket and surface level carpark
Ownership	Private
PTAL	5
Site source	Call for sites
Relevant planning applications	
<b>Site allocation</b>	
Site objective	Mixed-use residential and retail development within Wealdstone Town Centre
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Retail
Development timeframe	1-5 years
Indicative residential capacity	25 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site

Heritage	Protected Views Setting Corridor (Roxborough Road Bridge)
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Wealdstone) Primary Shopping Area RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Reprovision of retail floorspace
Development principles	<p>This site’s location in the Wealdstone Town Centre and Harrow &amp; Wealdstone Opportunity Area make it suitable for a mixed-use development including housing and retail components.</p> <p>New development should ensure a clear separation of uses and ensure that servicing can be provided satisfactorily in close proximity to residential development.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>Development should not detract from the setting of the adjacent locally listed church</p> <p>While the site is in the Wealdstone Town Centre, Wolseley Road along the western side of the site has a more suburban context which should be respected through development design and massing.</p>

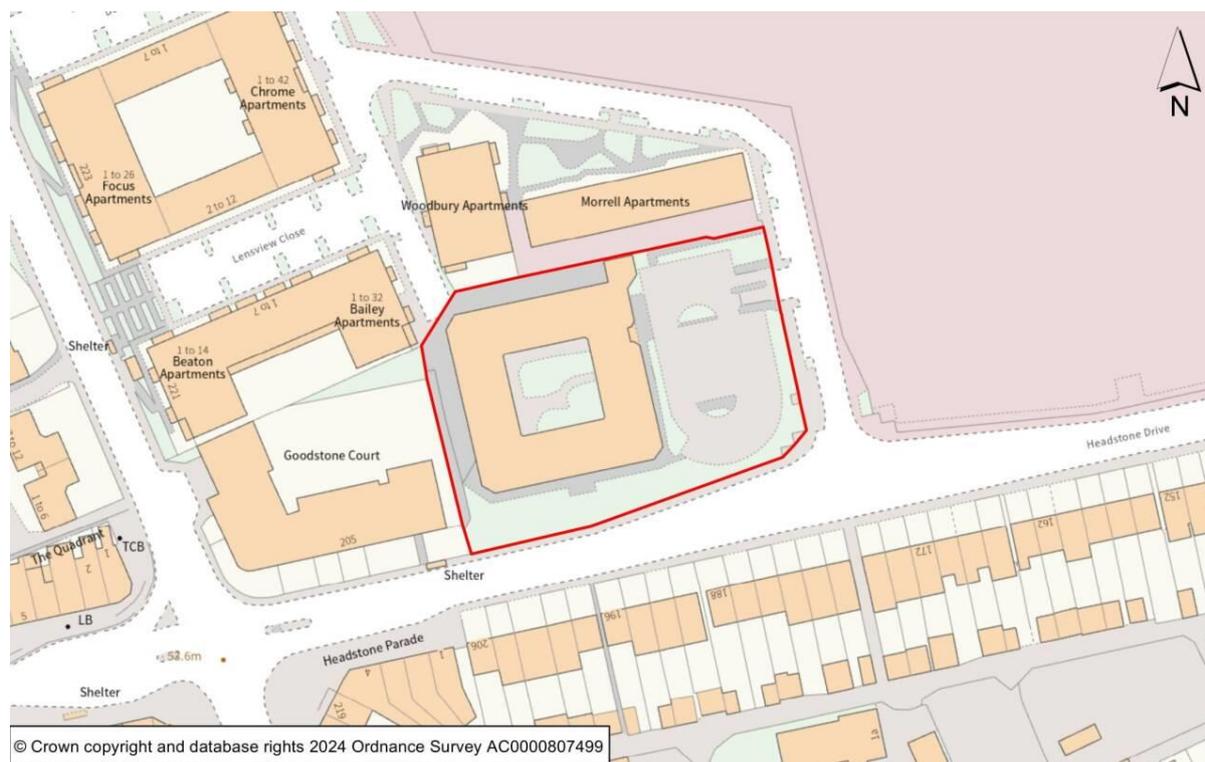
**Site OA16 – Kodak**



Site information	
Address:	Kodak, Headstone Drive, Wealdstone
Area:	15.00 ha
Description	A large site which formerly housed a Kodak Factory and which is now under comprehensive redevelopment to create a mixed-use precinct. The site lies along Harrow View and Headstone Drive to the north-west of Wealdstone Town Centre and the Harrow & Wealdstone Station.
Current use	Former Kodak Factory now large development scheme
Ownership	Private
PTAL	1a - 5
Site source	Allocation in Harrow and Wealdstone Area Action Plan (2013) Call for sites (part of the site, for a potential intensified scheme)
Relevant planning applications	The site has an extensive planning history including: <ul style="list-style-type: none"> <li>- Outline permission granted for whole site (P/2165/15)</li> <li>- Multiple amendments to outline permission (including P/5432/16, P/5023/17, P/4367/17, P/3004/18, P/2143/20, P/4158/22)</li> <li>- Variety of reserved matters, full planning permissions and amendments on individual plots and precincts within site</li> </ul>
Site allocation	
Site objective	Comprehensive mixed-use site development which optimises capacity of site while delivering a broad range of necessary infrastructure and land uses.
Allocated use	<b>Leading land use</b> Residential – C3 Dwelling Houses, C2 Residential Institutions (including accommodation for older persons)

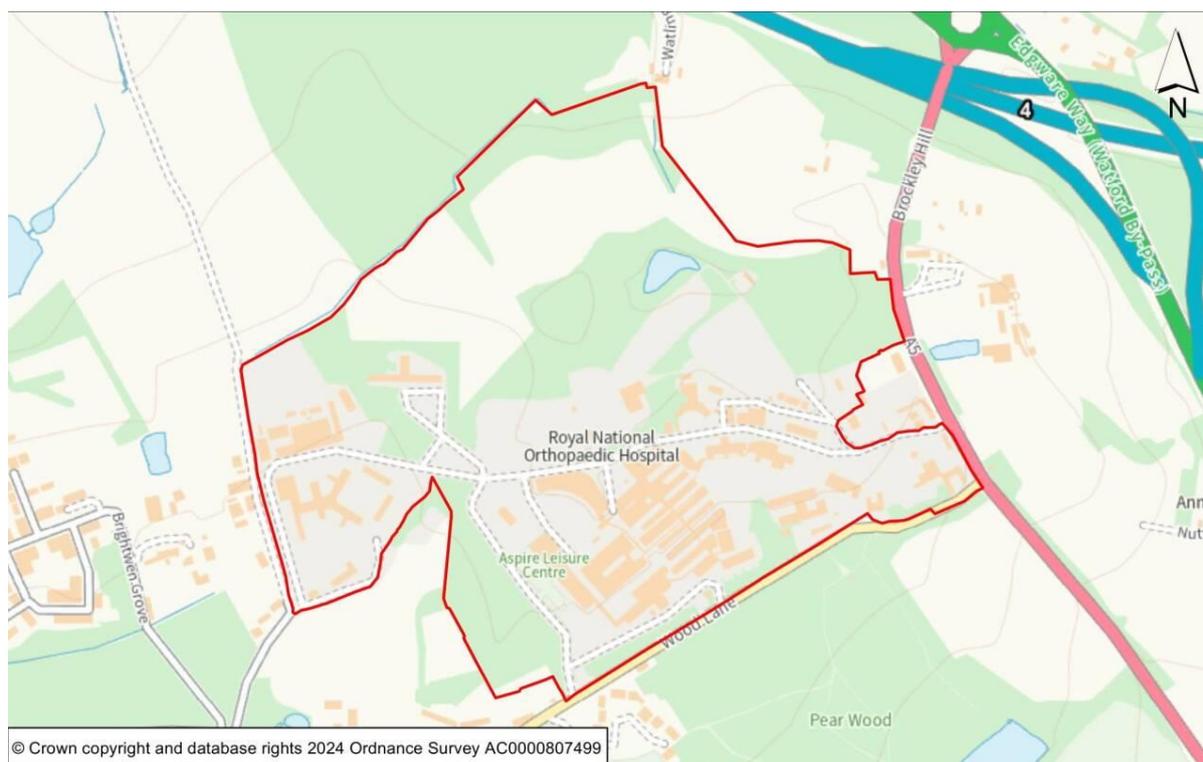
	<p><b>Supporting land use(s)</b></p> <p>Industrial and employment (B2 general industrial and B8 storage and distribution)</p> <p>NHS floorspace.</p> <p>E-use class (Commercial, Business and Service) of a scale that serves the development and immediate area</p> <p>F1 Learning and non-residential institutions class uses, including a primary school</p> <p>Community Centre</p> <p>Green link</p>
Development timeframe	1-5 years
Indicative residential capacity	2407 additional C3 dwelling houses / units or equivalent (from April 2024)
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Locally Listed Building (Underground Air Ministry Citadel) Protected Views Restricted Corridor (Old Redding) Protected Views Setting Corridor (Old Redding)
Other	Harrow & Wealdstone Opportunity Area Strategic Industrial Location Tall Building Zone RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	<p>Intensification of existing phases where appropriate and for phases yet to be built out (where this can be appropriately achieved)</p> <p>Primary School with a minimum three forms of entry</p> <p>NHS Floorspace with the minimum being that previously consented (1,386 sqm)</p> <p>Green link through site, with a minimum area of 23,500 sqm (subject to land requirements for three form entry primary school)</p> <p>Retail floorspace as appropriate to serve convenience retail needs</p> <p>Other town centre / community uses to serve the development and immediately surrounding area</p> <p>Junction improvements where appropriate</p>
Development principles	<p>Kodak site is a large strategic development site within the borough and has had several planning applications covering the entire site. Whilst some phases have been completed, further phases are still being brought forward. Any opportunity to intensify either existing phases or phases yet to have commenced should address the requirements of existing permissions on the site. Whilst an uplift in residential units may be supported, this will only be where appropriate site requirements (listed above) and any necessary uplift in the quantum of supporting infrastructure and uses is also secured to ensure a mixed and balanced community.</p> <p>NHS floorspace must be provided onsite to assist in meeting the need for GP Surgeries and other health care floorspace within the Harrow and Wealdstone Opportunity Area. The quantum provided must be at least the minimum floorspace secured under application P/3671/18 and take into</p>

	<p>account any further intensification of the residential use of the site above that granted permission under the 2015 Outline permission (P/2165/15). The site is appropriate for some tall building development with consideration to the Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024) taken when developing proposals for the site.</p>
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**Site OA17 – Former Kodak Administration Offices**

<b>Site information</b>	
Address:	Administration Building, Kodak, Headstone Drive, Wealdstone
Area:	0.47 ha
Description	The Site sits in the south-west corner of the Eastman Village or Harrow View East Masterplan site (otherwise known as the Kodak Site). It comprises an existing three storey office block with a central courtyard to the west of the site and associated car park comprising of 45 spaces to the east. It was formerly used as the administration office for the Kodak Factory. The promoter indicates the office has been vacant since 2018.
Current use	Vacant, former administration office of Kodak Factory
Ownership	Private
PTAL	3
Site source	Call for sites Allocation in Harrow and Wealdstone Area Action Plan (2013)
Relevant planning applications	<ul style="list-style-type: none"> <li>- Applications have been refused for prior approval conversion from office to residential (P/2991/21/PRIOR, P/2992/21/PRIOR, P/3975/21)</li> <li>- Planning application for mixed-use employment and co-living development (P/1154/24) (not yet determined – November 2024)</li> </ul>
<b>Site allocation</b>	
Site objective	Redevelopment to re-provide high quality industrial-related floorspace with the potential for co-location with residential uses on the upper floors.
Allocated use	<b>Leading land use</b> Flexible industrial-related floorspace Residential
Development timeframe	1-5 years

Indicative residential capacity	120 C3 dwelling houses / units or equivalent
<b>Planning considerations</b>	
Flood zone	Critical drainage area
Heritage	Protected Views Setting Corridor (Old Redding)
Other	Harrow & Wealdstone Opportunity Area Strategic Industrial Location Tall Building Zone RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Provision of flexible employment or light industrial space
Development principles	<p>The site is designated as Strategic Industrial Land (SIL) which provides floorspace and premises for industrial land to be carried out within the Borough and forms part of the London reservoir of industrial premises. Any new development must prioritise the reprovision of appropriate industrial floorspace on site, with any enabling residential element ensuring minimal reduction of the employment offer. The agent of change principle must be applied as part of ensuring high quality residential amenity is provided for future occupiers.</p> <p>The site is appropriate for some tall building development with consideration to the Harrow &amp; Wealdstone Opportunity Area Tall Building Study (2024) taken when developing proposals for the site.</p>

**Site GB1 – Royal National Orthopaedic Hospital (RNOH)**

<b>Site information</b>	
Address:	Royal National Orthopaedic Hospital, Brockley Hill, Stanmore
Area:	41.13 ha
Description	The Hospital is a nationally and internationally recognised facility located in the Green Belt at Brockley Hill, Stanmore. The hospital complex is spread over a substantial site area and occupies many outdated, substandard buildings.
Current use	Hospital and associated facilities
Ownership	Public
PTAL	0 - 1a
Site source	Allocation in Site Allocations Local Plan (2013)
Relevant planning applications	<ul style="list-style-type: none"> <li>- Planning permission granted for partial redevelopment of site including new hospital, associated facilities and housing in January 2007 (P/1704/05)</li> <li>- Permission renewed in June 2010 (P/0083/10)</li> <li>- Outline permission granted for a masterplan for a new hospital and up to 347 dwellings together with 19.2ha open space in August 2013 (P/3191/12). Some parts of this scheme relating to the hospital have been implemented, but the overall permission has lapsed.</li> </ul>
<b>Site allocation</b>	
Site objective	Modernisation (including appropriate expansion) of nationally significant hospital and associated facilities supported by residential or ancillary development, while not compromising the overall openness of the site.
Allocated use	<p><b>Leading land use</b></p> <p>Hospital</p> <p>Research and innovation institutions (connected to the Hospital)</p> <p>Green Belt</p>

	<b>Supporting land use(s)</b> Residential
Development timeframe	Phased development, with residential portion of development in the 11-15 year period.
Indicative residential capacity	347 - 500 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Scheduled Ancient Monuments (Brockley Hill Romano-British pottery and settlement)
Other	Green Belt Areas Of Special Character Sites of Importance for Nature Conservation (Pear Wood and Stanmore Country Park, Royal Orthopaedic Hospital, Watling Chase planting site and environs) RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Hospital use retained on site. Delivery of modernised hospital and ancillary development to support the successful functioning of the hospital Enhancements to Green Belt
Development principles	<p>This is a strategic previously developed site in the Green Belt which is suitable for redevelopment within the boundary of the existing developed area, and with potential for some development outside of these boundaries (for example as permitted in previous planning permissions).</p> <p>The desirability of providing new accommodation for the hospital is a significant consideration and may constitute very special circumstances for enabling development that would otherwise be inappropriate development in the Green Belt.</p> <p>The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements &amp; support measures as set out in the Council's Long Term Transport Strategy and Local Implementation Plan</p> <p>There may also be potential for the development of research and / or innovation facilities associated with the hospital given its national and international stature.</p> <p>Redevelopment should improve the openness of parts of the site not required for development, including through rationalisation of buildings and provision of open space.</p> <p>The site and its surroundings include features of archaeological, biodiversity and heritage importance which must be safeguarded from the impacts of development, and where feasible sought to be enhanced (either through improvement or access). New development should also have regard to environmental constraints such as surrounding agricultural land, and any potential land contamination by way of historic landfill sites</p>

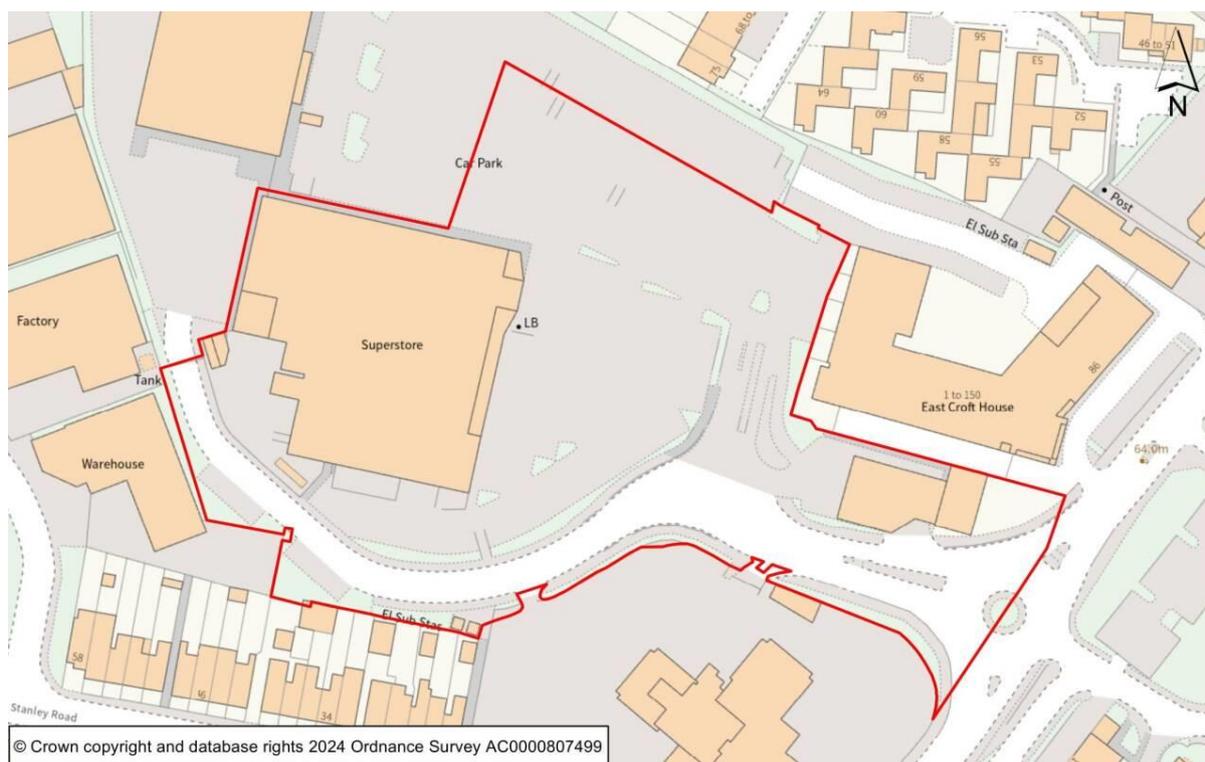
**Site GB2 – Watling Farm**



<b>Site information</b>	
Address:	Watling Farm Close, Bushey
Area:	1.06 ha
Description	This site is located on the northern edge of the Borough in the Green Belt and contains gypsies and travellers pitches.
Current use	Gypsy and traveller pitches (two)
Ownership	Public (Council)
PTAL	1a
Site source	Allocation in Site Allocations Local Plan (2013)
Relevant planning applications	Planning permission for the use of the site as a gypsy caravan site (with 15 pitches) was first granted in 1974.
<b>Site allocation</b>	
Site objective	Provision of additional gypsy and traveller pitches as required to meet the Borough’s identified need
Allocated use	<b>Leading land use</b> Gypsy and traveller pitches
Development timeframe	0-5 and 6-10 years, depending on actual demand
Indicative residential capacity	12-13 additional pitches
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	
Other	Green Belt Areas Of Special Character

	Sites of Importance for Nature Conservation (Royal Orthopaedic Hospital, Watling Chase planting site and environs) RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Delivery of Gypsy and traveller pitches
Development principles	Part of the site is subject to flood risk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.

**Site O1 – Waitrose South Harrow**



<b>Site information</b>	
Address:	140 Northolt Road, South Harrow
Area:	1.57 ha
Description	The site contains a Waitrose Supermarket. It is located within a former retail park, the north-west corner of which is under redevelopment for residential use. The site is bounded by the Brember Road Industrial Park (West), the Grange Farm Estate (north) with employment uses along Northolt Road to the East and residential to the south. Surface level car parking serves the existing Waitrose Supermarket.
Current use	Supermarket and surface level carpark
Ownership	Private
PTAL	3
Site source	Council site search
Relevant planning applications	- Planning permission for redevelopment of adjacent site within retail park (P/2052/20)
<b>Site allocation</b>	
Site objective	Redevelopment to provide the reprovion of supermarket with residential development.
Allocated use	<b>Leading land use</b> Supermarket <b>Supporting land use(s)</b> Residential development NHS Floorspace Open Space
Development timeframe	11-15 years

Indicative residential capacity	124 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	
Other	RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	<p>Reprovision of supermarket</p> <p>Appropriate level of replacement carparking</p> <p>Residential development</p> <p>NHS floorspace</p> <p>Open Space</p>
Development principles	<p>Any new development within the Waitrose site must respond positively to the implemented scheme on the remainder of the former retail park and the adjacent Grange Farm Estate re-development.</p> <p>An appropriate level of carparking must be provided to continue to serve the Waitrose superstore and also for any residential development. The allocation seeks to re-provide a supermarket on site rather than specifying retail, given the out of centre location and servicing requirements for such a use.</p> <p>Located adjacent (west) to the Waitrose supermarket is a designated industrial estate (Brember Road Estate) therefore any residential development must apply the Agent of Change principle.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>The site may offer the opportunity to make provision of publicly accessible open space to assist in addressing the identified open space deficiency in the south of the Borough.</p> <p>Where there is an evidential need, NHS floorspace will be secured to cater for future population growth within the area over the plan period.</p> <p>The site is located in a predominately residential area and any new development should be progressed following the guidance set out in the Tall Building (Building Height).</p>

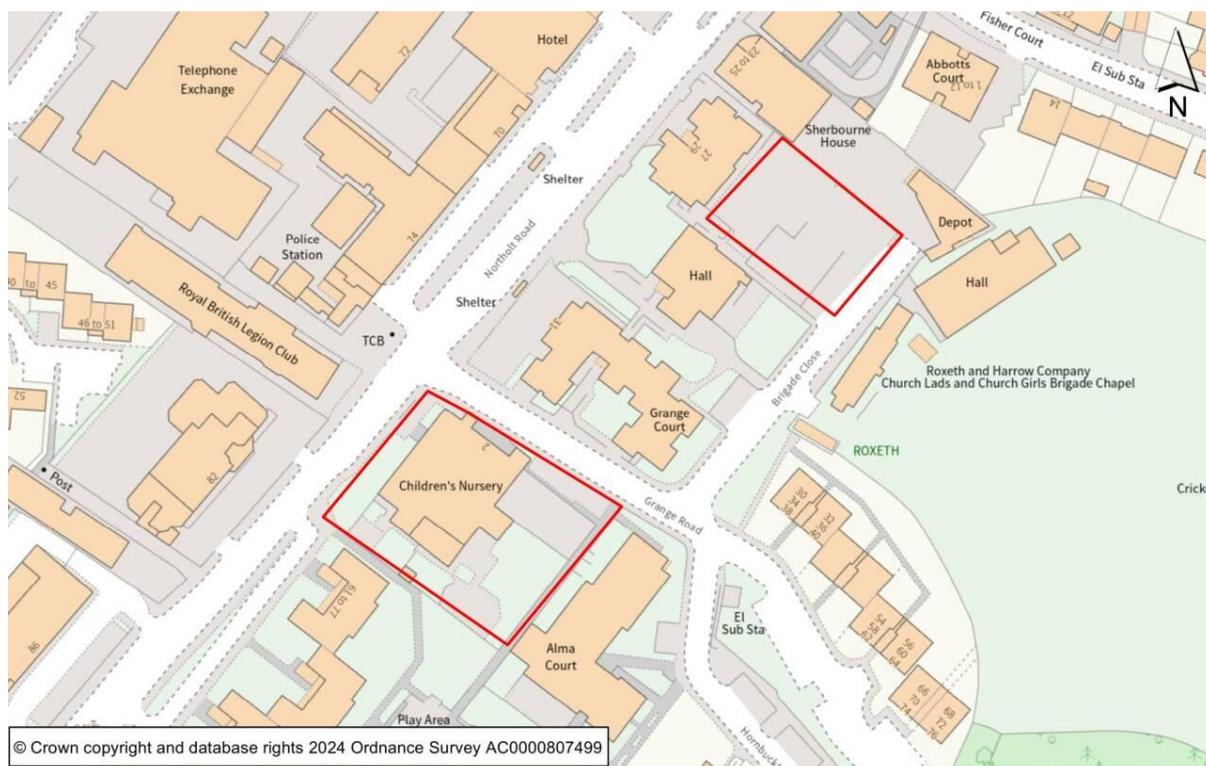
**Site O2 – Roxeth Library & Clinic**



Site information	
Address:	Northolt Road Clinic, 322 Northolt Road, South Harrow Roxeth Library, Northolt Road, South Harrow
Area:	0.13 ha
Description	This site includes the Roxeth Library and Clinic on Northolt Road within the South Harrow District Centre
Current use	- Library - Healthcare clinic
Ownership	Public
PTAL	5
Site source	Allocation in Site Allocations Local Plan (2013)
Relevant planning applications	
Site allocation	
Site objective	Mixed use development which improves the utilisation of this currently low-density town-centre site
Allocated use	<b>Leading land use</b> Community uses Town centre uses NHS Floorspace <b>Supporting land use(s)</b> Residential
Development timeframe	11-15 years
Indicative residential capacity	15 C3 dwelling houses / units

<b>Planning considerations</b>	
Flood zone	Critical drainage area
Heritage	
Other	Town Centre Boundaries (South Harrow) Primary Shopping Area RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Replacement library NHS Floorspace
Development principles	This site is suitable for a mixed-use scheme comprising retail or other town centre uses, replacement or retention of existing community uses (the Roxeth Library and NHS Clinic) and supporting residential development on the upper levels. Additional NHS floorspace may be required where evidenced.

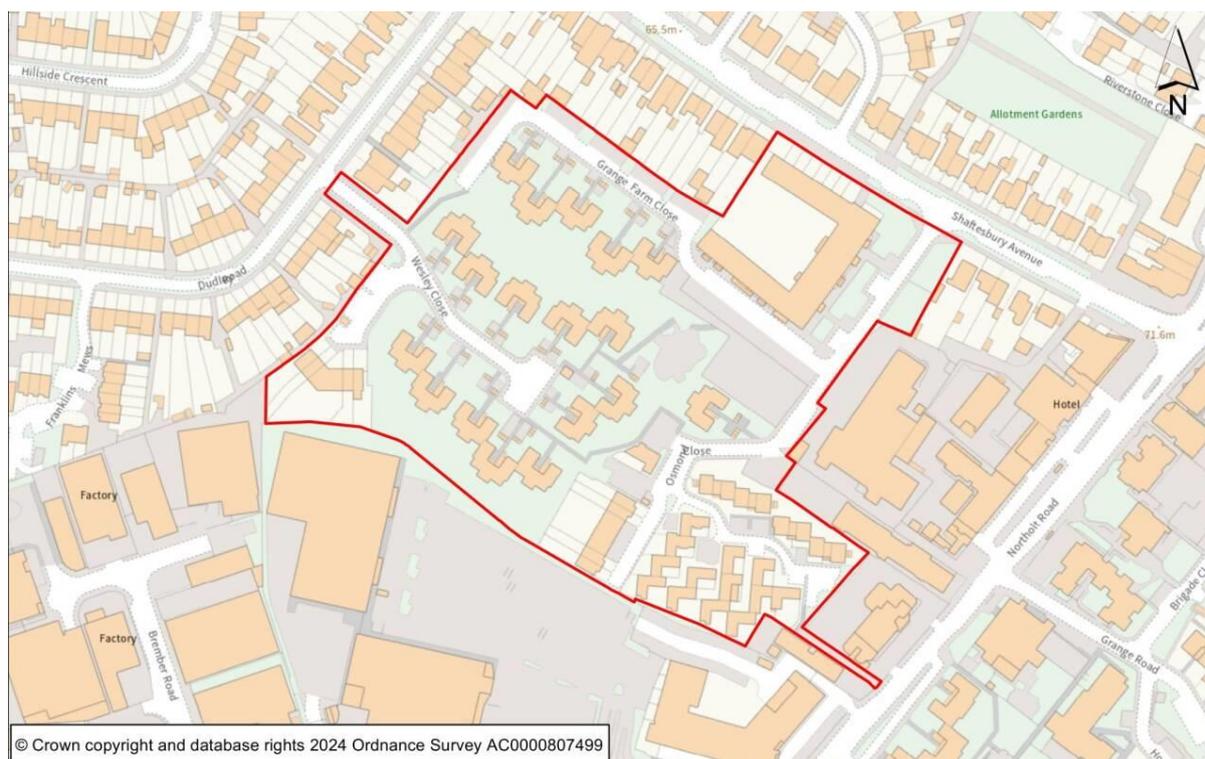
**Site O3 – Northolt Road Nursery and Carpark at rear of 27 Northolt Road**



Site information	
Address:	2 Grange Road, South Harrow Rear of 27 Northolt Road, South Harrow
Area:	0.30 ha
Description	Two Council-owned parcels in South Harrow: A single-storey nursery on the corner with Grange Road and a nearby carpark located behind buildings on Northolt Road.
Current use	Current council nursery and carpark
Ownership	Public (Council)
PTAL	4
Site source	Call for sites
Relevant planning applications	
Site allocation	
Site objective	Residential-led redevelopment of under-utilised Council-owned sites in South Harrow
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Nursery Offices
Development timeframe	6 - 10 years
Indicative residential capacity	37 C3 dwelling houses / units

<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	
Other	Designated Open Space - part of site Areas of Special Character adjoins site RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Reprovision of nursery on-site or relocation to an appropriate alternative site Provision of appropriate level of car parking
Development principles	<p>These sites are close to the South Harrow station and District Centre, and are suitable for residential-led development</p> <p>Development of the car-park should be accompanied by an assessment of parking need which demonstrates that an appropriate level of parking is being retained, re-provided on site-or relocated.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p>

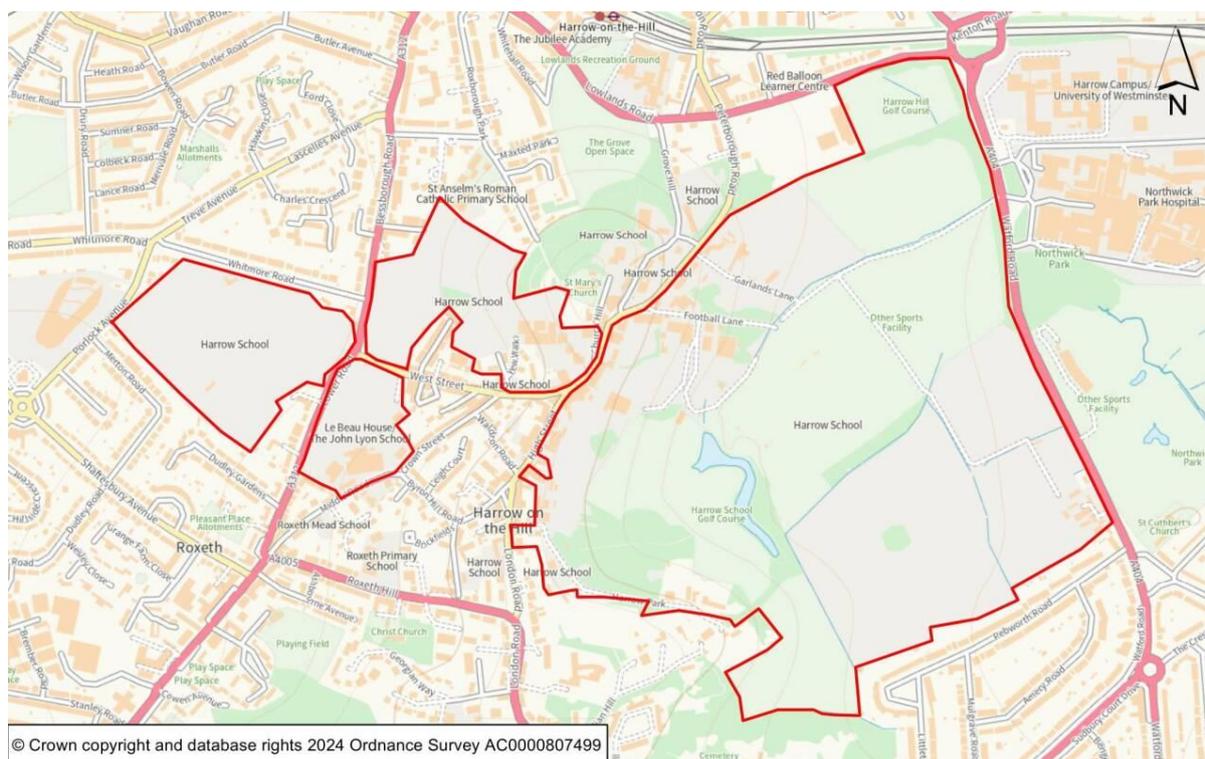
**Site O4 – Grange Farm**



<b>Site information</b>	
Address:	Grange Farm Crescent, Harrow
Area:	4.08 ha
Description	Consists of the Grange Farm Estate, a Council housing estate in South Harrow situated behind buildings on Northolt Road, with access from Northolt Road, Shaftesbury Avenue and Wesley Close. This estate is under redevelopment with the first phase (adjoining Shaftesbury Avenue) complete. There are interfaces with suburban back gardens to the north and west and with a retail park (with permission for mixed use redevelopment) to the south.
Current use	Council housing estate
Ownership	Public (Council)
PTAL	2 - 3
Site source	Council estate regeneration project
Relevant planning applications	- P/3524/16 (Hybrid Application) for estate redevelopment
<b>Site allocation</b>	
Site objective	Regeneration of the remainder of the Grange Farm Estate
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Community hub Open space
Development timeframe	1-5 and 6-10 years

Indicative residential capacity	300 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Locally Listed Building (Royal British Legion Club) adjoins site
Other	Designated Open Space - part of site RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Residential Community floorspace Open Space
Development principles	The Council granted hybrid planning permission under P/3524/16, of which Phase 1 has been implemented. Phases two and three should be delivered in general conformity with the masterplan / design code for the wider site or through a revised planning application which would continue to deliver against the allocation requirements.

**Site O5 – Harrow School Estate & John Lyon School**



Site information	
Address:	
Area:	11.28 ha
Description	The estates of the Harrow School and John Lyon School occupy a substantial part of Harrow on the Hill and comprises many heritage assets, sites of biodiversity importance, trees masses and a substantial tract of Metropolitan Open Land all of which are important attributes which make up the area’s special character.
Current use	Residential school buildings, sports facilities and playing fields
Ownership	Private
PTAL	Varies across site
Site source	Allocation in Site Allocations Local Plan (2013)
Relevant planning applications	P/1940/16
Site allocation	
Site objective	Facilitate the continued maintenance and use of assets within the school estates, and development and change within the estate to strengthen the educational roles of the Harrow School and John Lyon School.
Allocated use	<b>Leading land use</b> Refurbishment/redevelopment of school buildings, sports facilities and enhancement of playing fields
Development timeframe	Throughout plan period
Indicative residential capacity	N/A

<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Archaeological Priority Areas, Locally Listed Buildings (Multiple contained on site) Listed Buildings (Multiple contained on site) Conservation Areas (Harrow Park Conservation Area, Harrow School Conservation Area Harrow on the Hill, Harrow on the Hill Village Conservation Area, Roxborough Park and The Grove Conservation Area) Protected Views Restricted Corridors (Capital Ring Capital Ring, Football Lane, West Harrow Recreation Ground) Protected Views Setting Corridors (Capital Ring Capital Ring, Football Lane, Football Lane, Old Redding, Stanmore Country Park Extension Wood Farm, Roxborough Road Bridge, West Harrow Recreation Ground) Registered Parks and Gardens - part of site
Other	Metropolitan Open Land - part of site Areas Of Special Character Sites of Importance for Nature Conservation (Harrow on the Hill) - part of site RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Maintain the School’s reputation as a world class centre of education. Improve security, creating convenient and safe access to, across and throughout the school.  To deliver an improved physical environment – by conserving and enhancing the historic and natural environments, including Metropolitan Open Land openness, sensitive landscaping, reinstating viewing corridors and creating first-class new buildings, facilities and spaces Achieve community integration
Development principles	Harrow on the Hill, St Mary’s Church and many features of the Harrow School and John Lyon School estates are important features of Harrow’s townscape and landscape. As owners and occupiers the schools plays a vital role in maintaining these assets and funding their improvement. The School institution is itself an important local asset.  The Harrow School Supplementary Planning Document sets out an agreed masterplan for development and change within the School Estate. Council will support proposals for redevelopment that form part of an agreed masterplan to maintain or enhance the openness of Metropolitan Open Land and which secure community access to land and facilities.  The Council will resist any alteration to the boundaries of MOL and will give the same level of protection to MOL as to the Green Belt, consistent with London Plan.  Proposals must also conserve or enhance heritage consistent with the Council’s supplementary planning documents, together with the supporting character appraisals and management strategies of conservation areas.  Development should comply with relevant development management policies for the protection of the natural environment, local views and the Harrow on the Hill Area of Special Character

	<p>Proposals must have regard to the public rights of way, ensuring that these do not become obstructed and that the quality of the experience enjoyed by walkers is not diminished. Proposals requiring rerouting of public rights of way will not be permitted if this would lead to substantial diversions at odds with pedestrian desire lines through the land.</p>
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**Site O6 – Brethrens' Meeting Hall, The Ridgeway**

<b>Site information</b>	
Address:	Pavilion, The Ridgeway, North Harrow
Area:	1.39 ha
Description	A triangular parcel of land located between The Ridgeway, allotments and a London Underground Line. The site was formerly used as a place of worship and contains a single low rise building and associated surface level carparking. It has recently been acquired by Council for the purpose of delivering a new school.
Current use	Religious meeting hall
Ownership	Public
PTAL	1b - 2
Site source	Planned new infrastructure
Relevant planning applications	Application for mixed-use scheme refused (P/1492/20)
<b>Site allocation</b>	
Site objective	Provision of a new school for Children with special educational needs and disabilities (SEND) to meet identified need.
Allocated use	<b>Leading land use</b> School <b>Supporting land use(s)</b> Uses on remaining part of site as appropriate
Development timeframe	1-5 years
Indicative residential capacity	N/A

<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	
Other	Sites of Importance for Nature Conservation (Old Tennis Court, West Harrow Recreation Ground and The Ridgeway Embankment) adjoins site RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Pedestrian access through site to West Harrow Station Deliver a school for Children with special educational needs and disabilities (SEND)
Development principles	<p>There is an existing path from The Ridgeway to the West Harrow Station along a right of way through the adjoining allotments. This path should be extended through the site to provide a more direct access route when any development occurs.</p> <p>Development should not impact on the amenity or function of the adjoining allotments.</p> <p>As the site is adjacent to London Underground infrastructure, early consultation with Transport for London's infrastructure protection team will be required.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p>

**Site O7 – Rayners Lane Station Carpark**

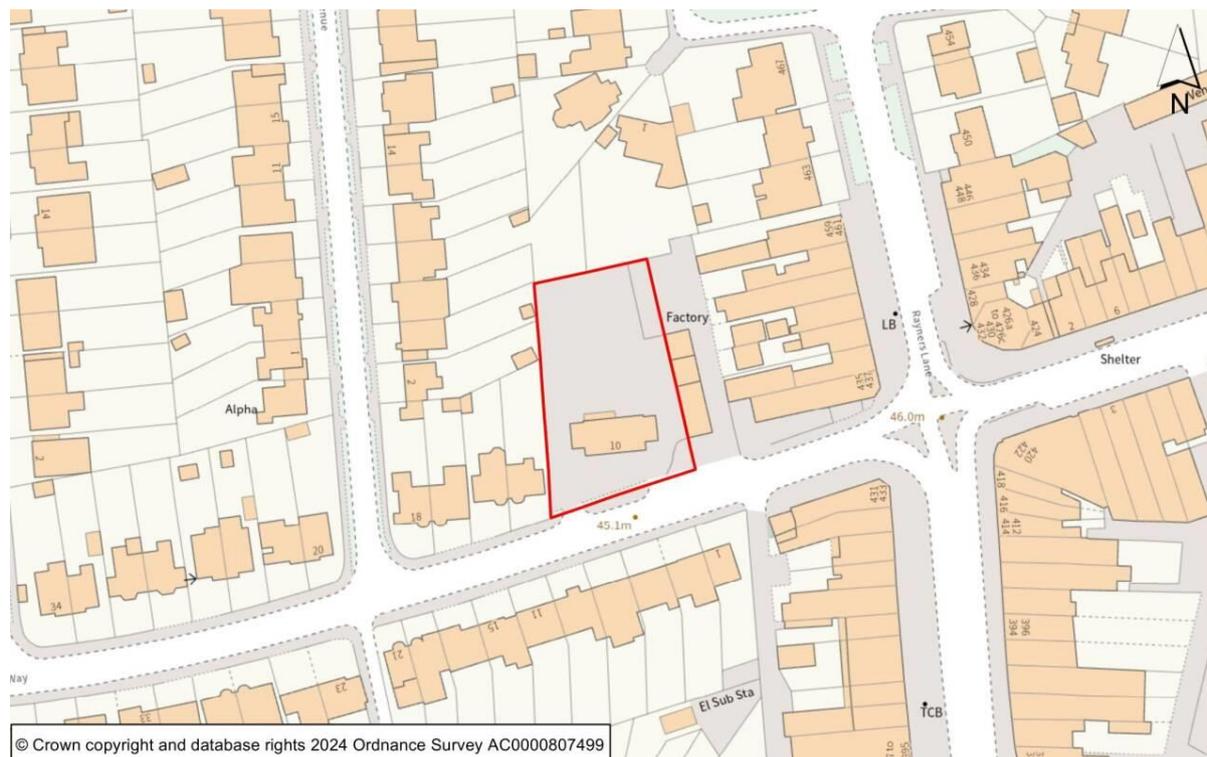


<b>Site information</b>	
Address:	Rayners Lane Station Car Park, High Worple, Rayners Lane
Area:	0.85 ha
Description	This site comprises the carpark for Rayners Lane Station and adjacent shops which front Alexandra Avenue. The existing carpark is a long rectangular site situated between rear gardens of houses on High Worple and the railway line. It is located on the boundary of the Rayners Lane District Centre.
Current use	- Surface level carpark - Retail facing Alexandra Avenue
Ownership	Public
PTAL	4 - 5
Site source	Call for sites Allocation in Harrow Site Allocations Local Plan (2013)
Relevant planning applications	- Application for residential accommodation withdrawn (P/1448/20)
<b>Site allocation</b>	
Site objective	Mixed-use development which improves access to Rayners Lane Station, while retaining or re-providing a sufficient level of car parking
Allocated use	<b>Leading land use</b> Residential Car parking <b>Supporting land use(s)</b> Town centre uses (eastern part of site only)
Development timeframe	6-10 years

Indicative residential capacity	69 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Conservation Areas (Rayners Lane) Locally Listed Buildings (466, 470 & 472 Rayners Lane) opposite site Listed Building (Rayner's Lane London Regional Transport Underground Station) adjoins site
Other	Town Centre Boundaries (Rayners Lane) Primary Shopping Area Sites of Importance for Nature Conservation (Rayners Lane Railside Lands) adjoins site RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Deliver high quality residential development Re-provision of an appropriate level station car-parking to help meet need generated by commuters Provide step-free access to Rayners Lane Station
Development principles	<p>As it contains a large surface level carpark immediately adjacent to Rayners Lane Station, this site has significant potential for residential development in an accessible location.</p> <p>Town centre uses should be confined to the portion of the site fronting Alexandra Avenue/Rayners Lane, which currently contains single-storey retail premises. Active frontages should be provided here.</p> <p>Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.</p> <p>The design and layout of any proposals must be sensitive to the heritage of Rayners Lane, in particular the neighbouring listed station building which should remain the prominent visual feature in the approach from Imperial Drive and Alexandra Avenue.</p> <p>The area to the west of the site forms a Site of Importance for Nature Conservation. The design and layout of development on the site must be sensitive to the nature conservation site and to setting of the adjacent listed station building and to the Rayners Lane conservation area.</p> <p>Proposals must be designed to minimise where possible impacts on the amenity of neighbouring occupiers in High Worples.</p> <p>The site lies directly on a secondary aquifer, the groundwater in which may be in hydraulic conductivity with the chalk principal aquifer. Therefore any planning application for this site must include a preliminary risk assessment to assess if land contamination may be present at the site. This should be submitted with the planning application. The assessment needs to include:</p> <ul style="list-style-type: none"> <li>• Information on past and current uses,</li> <li>• If sensitive controlled waters receptors are present, and</li> </ul>

	<ul style="list-style-type: none"><li>• If the site could pose a pollution risk, including should contamination be present</li><li>• If any aspects of the proposed development could pose a pollution risk should contamination be present</li></ul> <p>Further work such as an intrusive site investigation may be required.</p> <p>As the site is adjacent to London Underground infrastructure, early consultation with Transport for London’s infrastructure protection team will be required.</p>
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**Site O8 – Harrow West Conservative Association**



<b>Site information</b>	
Address:	10 Village Way, Rayners Lane, Pinner
Area:	0.16 ha
Description	The site is located on the edge of the Rayners Lane District Town Centre and contains a two-storey property with surface level carparking to the rear. To the east of the site the Rayners Lane Town Centre which is made of two storey parades with employment on the ground floor. The remainder of the site is surrounded by two-storey residential properties.
Current use	Harrow West Conservative Association
Ownership	Private
PTAL	4
Site source	Call for sites Allocation in Harrow Site Allocations Local Plan (2013)
Relevant planning applications	
<b>Site allocation</b>	
Site objective	Mixed-use development of edge-of-centre site.
Allocated use	<b>Leading land use</b> Community or employment space Residential
Development timeframe	6-10 years
Indicative residential capacity	13 C3 dwelling houses / units

<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	
Other	RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Reprovision of existing employment floorspace, or replacement with community floorspace
Development principles	<p>Development would need to address flood risk issues associated with the Smarts Brook arm of the Yeading Brook. The whole of the site is within Flood Zone 3a and it is therefore unsuitable for residential development unless a site specific flood risk assessment demonstrates that the exception test can be passed. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>Being at the edge of the district centre, the site forms a transition between the more commercial character of the centre and the surrounding suburban housing. Particular care will therefore be needed to manage impacts upon neighbouring dwellings and to ensure that the surrounding residential environment is safeguarded.</p>

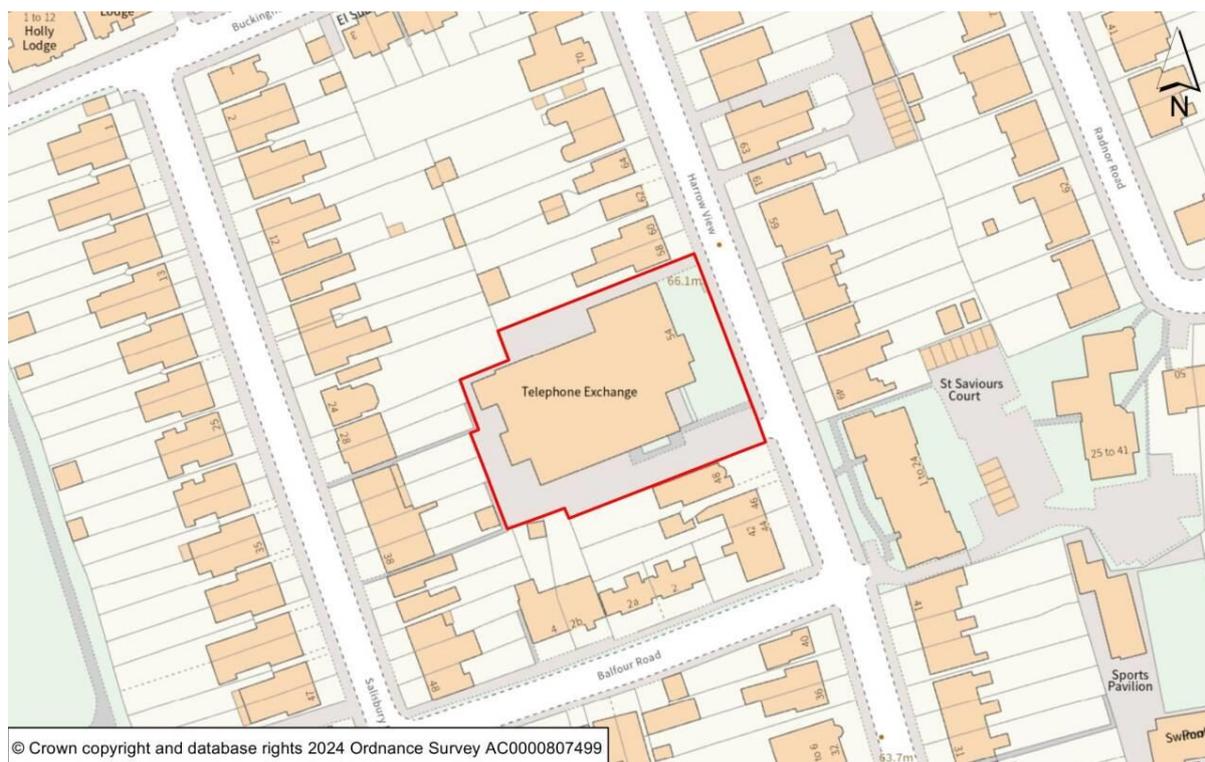
**Site O9 – Pinner Telephone Exchange**



Site information	
Address:	Pinner Telephone Exchange, Exchange Walk, Pinner
Area:	0.51 ha
Description	The site is a Telephone exchange building fronts onto Cannon Lane (no direct access) and is accessed off Village Way via Exchange Walk. The rear of the site (accessed off Exchange Walk) is a large surface car park. To the south of the site is a two to three story flatted development that is adjacent to London Underground Line. To the north and east of the site is suburban two storey properties. The Yeading Brook lies immediately to the east of the site, with allotments located beyond it.
Current use	Telephone exchange
Ownership	Private
PTAL	1b - 2
Site source	Call for sites
Relevant planning applications	
Site allocation	
Site objective	Residential redevelopment of the site when no longer required as a telephone exchange.
Allocated use	<b>Leading land use</b> Residential
Development timeframe	10-15 years
Indicative residential capacity	44 C3 dwelling houses / units

<b>Planning considerations</b>	
Flood zone	Flood zone 2 - Part of site Flood zone (Surface Water) 3a - Part of site Flood zone (Fluvial and Tidal) 3a - Part of site Flood zone (Fluvial and Tidal) 3b - Part of site
Heritage	
Other	Designated Open Space - part of site Green Chains and Corridors - part of site Sites of Importance for Nature Conservation (Yeading Brook) - part of site Group Tree Preservation Order (Front of site) RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Environmental Improvements
Development principles	<p>The eastern part of the site adjoins the Yeading Brook, which is a site of importance for nature conservation. Design and layout of development must be sensitive to the Brook and minimise impacts on it.</p> <p>The eastern part of the site along what is currently the only access-route is flood-prone. The design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>The design of development should respond to the existing flatted housing to the south and suburban housing to the north.</p>

**Site O10 – Harrow View Telephone Exchange**



<b>Site information</b>	
Address:	Harrow Telephone Exchange, 54 Harrow View, Harrow
Area:	0.28 ha
Description	A telephone exchange surrounded by 2-storey and some 3-storey suburban housing of a range of types including flatted development, terraced, semi-detached and detached dwellings.
Current use	Telephone exchange
Ownership	Private
PTAL	1b
Site source	Call for sites
Relevant planning applications	
<b>Site allocation</b>	
Site objective	Residential led redevelopment of the site when no longer required as a telephone exchange
Allocated use	<b>Leading land use</b> Residential
Development timeframe	6 - 10 years
Indicative residential capacity	27 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area
Heritage	Protected Views Restricted Corridor (Harrow View), Protected Views Setting Corridor (Old Redding)

Other	RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Retain streetscape greenery
Development principles	<p>This site is suitable for redevelopment for residential purposes when obsolete as a telephone exchange.</p> <p>The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements &amp; support measures as set out in the Council’s Long Term Transport Strategy and Local Implementation Plan.</p> <p>Development should be sensitive the surrounding suburban context.</p>

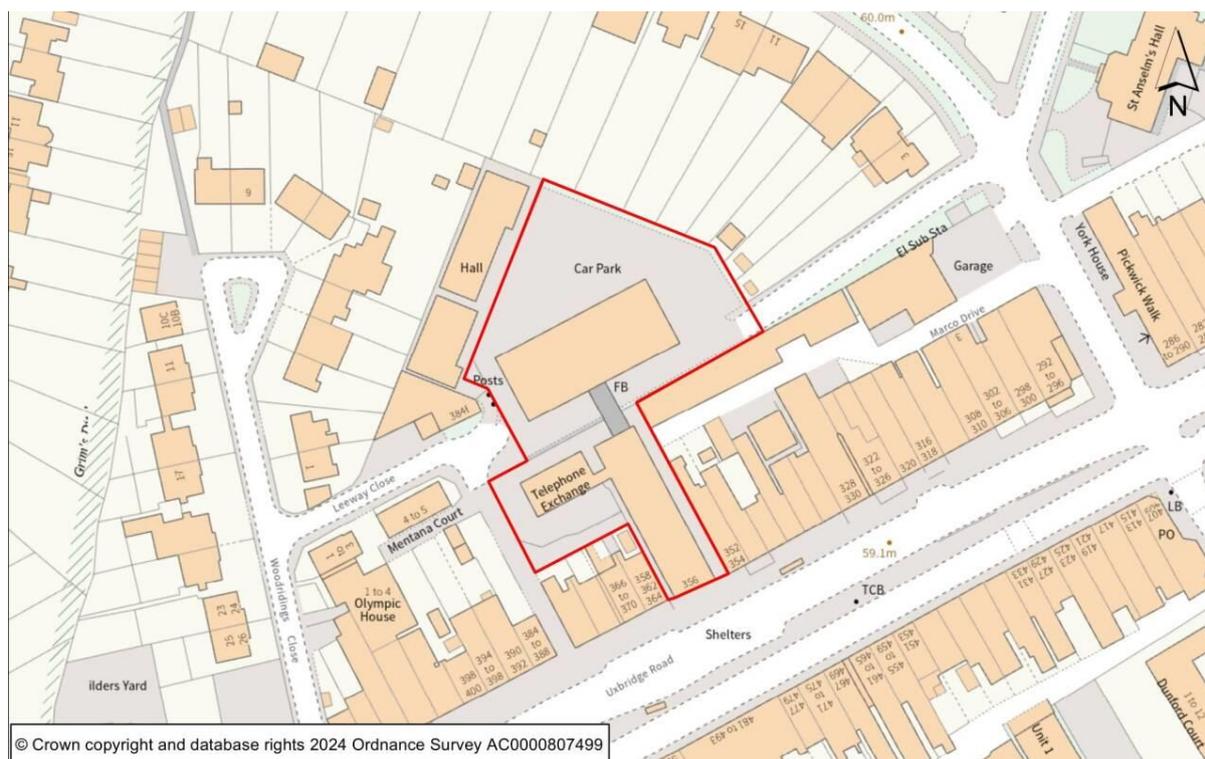
**Site O11 – North Harrow Methodist Church**



<b>Site information</b>	
Address:	North Harrow Methodist Church, Pinner Road, North Harrow
Area:	0.34 ha
Description	The site is currently occupied by the North Harrow Methodist Church and comprises a church, church halls, ancillary facilities and scouts' premises. It is on the northern edge of the North Harrow District Centre.
Current use	Church, associated hall and Scout Hall
Ownership	Private
PTAL	3
Site source	Allocation in Harrow Site Allocations Local Plan (2013)
Relevant planning applications	
<b>Site allocation</b>	
Site objective	Enabling mixed-use development facilitating replacement or enhancement of existing church and community facilities
Allocated use	<b>Leading land use</b> Church and community facilities <b>Supporting land use(s)</b> Residential Limited level of town centre uses appropriate for an edge of centre location
Development timeframe	11-15 years
Indicative residential capacity	15-33 C3 dwelling houses / units

<b>Planning considerations</b>	
Flood zone	Flood zone (Surface Water) 3a - Part of site
Heritage	
Other	RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Retention or replacement of an appropriate amount of church and community use floorspace
Development principles	<p>Comprehensive or partial redevelopment of this site must be led by the need to secure the re-provision or retention of the church hall and other facilities. To this end an enabling mixed-use scheme comprising residential and/or retail uses would be suitable.</p> <p>The church, hall and other facilities are actively used both by the church members and by other local groups and are a vital part of the social infrastructure of the North Harrow community. There should be no loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities.</p> <p>In retail policy terms, the site is located outside of the North Harrow district centre boundary but is within 300m of the centre's secondary shopping frontage, and the site should therefore be treated as being 'edge of centre'. It is suitable for redevelopment to multiple small retail units, or for a single convenience goods retailer such as a discount food outlet.</p> <p>Being at the edge of the district centre, the site forms a transition between the more commercial character of the centre and the surrounding suburban housing. Particular care will therefore be needed to manage impacts upon neighbouring dwellings and to ensure that the surrounding residential environment is safeguarded.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p>

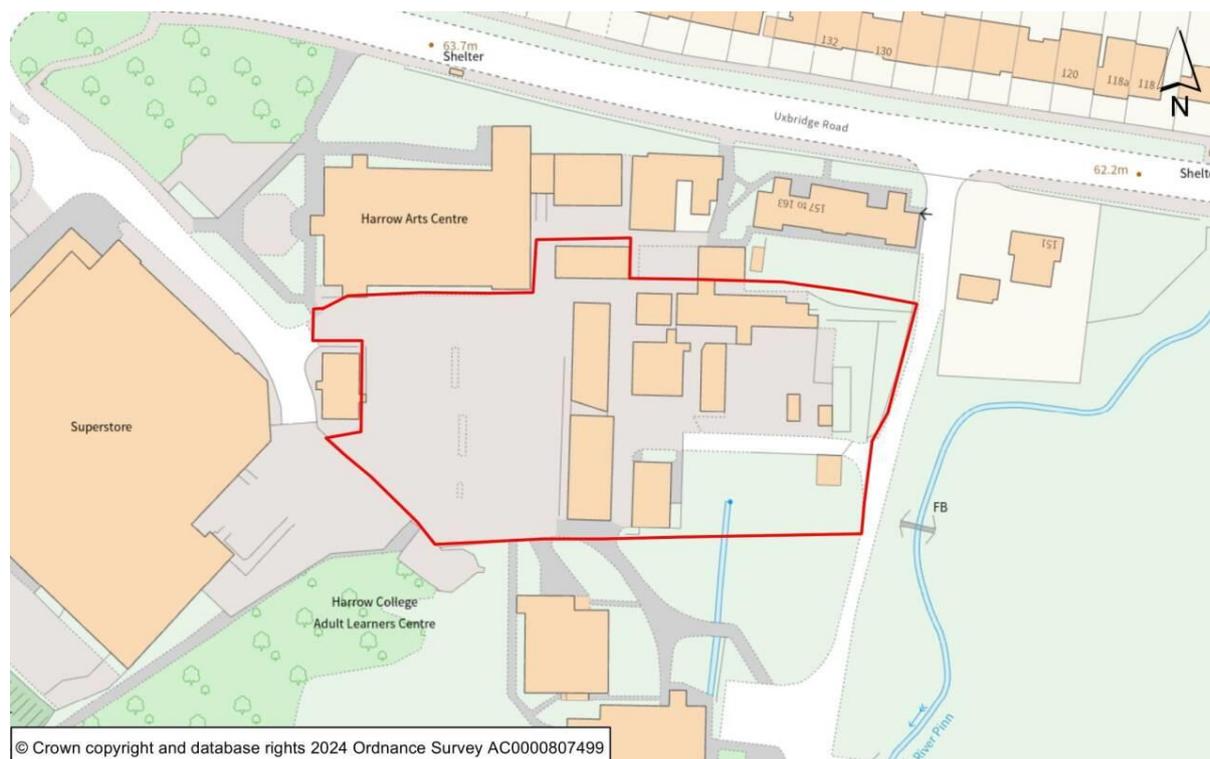
**Site O12 – Hatch End Telephone Exchange**



Site information	
Address:	Telephone Exchange, 356 Uxbridge Road, Hatch End
Area:	0.38 ha
Description	A telephone exchange within the Hatch End Local Centre. The site includes a narrow frontage to Uxbridge Road with two-storey fenestration but height commensurate with the three storey properties on either side. To the rear of the site the telephone exchange extends over a public car park.
Current use	Telephone exchange
Ownership	Public (Council) - Part of site Private - Part of site
PTAL	2
Site source	Call for sites
Relevant planning applications	
Site allocation	
Site objective	Residential led redevelopment of the site when no longer required as a telephone exchange
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Appropriate Town centre use (within designated shopping frontage)
Development timeframe	6 - 10 years
Indicative residential capacity	44 C3 dwelling houses / units

<b>Planning considerations</b>	
Flood zone	Critical drainage area
Heritage	
Other	Town Centre Boundaries (Hatch End) RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Retention of frontage Appropriate provision of car-parking Contribution to public realm
Development principles	<p>An opportunity exists to demolish and rebuild the rear element, however development should retain the front element facing onto Uxbridge Road which forms an attractive part of the streetscape.</p> <p>There may be an opportunity for upwards extension if this is done sensitively in relation to the frontage of the building and the surrounding urban fabric.</p> <p>An appropriate town centre use should be provided to activate the frontage to Uxbridge Road, and to respond to the position of the site within the Hatch End Local Centre.</p> <p>An appropriate level of car-parking should be retained, reprovided on site or relocated as part of development in order to meet the need generated by development as well as for the broader town centre.</p> <p>Appropriate access should continue to be provided to the nursery and community use adjoining the site to the north-west, which are currently accessed through the on-site carpark.</p>

**Site O13 – Harrow Arts Centre**



<b>Site information</b>	
Address:	Harrow Arts Centre, 171 Uxbridge Road, Hatch End
Area:	0.73 ha
Description	The site comprises the car park serving Harrow Arts Centre together with a complex of ancillary buildings.
Current use	Arts centre buildings
Ownership	Public (Council)
PTAL	2
Site source	Allocation in Harrow Site Allocations Local Plan (2013)
Relevant planning applications	- Permissions relating to earlier phases of redevelopment (P/3496/19, P/3594/20, P/2525/22, P/1099/23)
<b>Site allocation</b>	
Site objective	Expansion and modernisation of arts centre and ancillary buildings
Allocated use	<b>Leading land use</b> Arts centre and associated uses
Development timeframe	0-5 and 6-10 years
Indicative residential capacity	N/A
<b>Planning considerations</b>	
Flood zone	Critical drainage area
Heritage	Locally Listed Buildings (151, 157 & 169 Uxbridge Road) form part of the wider site Listed Building (BG Elliot Hall to Harrow College of Further Education) form part of the wider site
Other	Sites of Importance for Nature Conservation (Harrow Arts Centre)

	RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	
Development principles	<p>Harrow Arts Centre is undergoing a major programme of renewal, with a masterplan and phase one and two works complete. The Arts Centre is a key part of Harrow’s cultural strategy. The site is suitable for further works that complement the existing arts and broader community offer or provide replacement facilities if appropriate.</p> <p>Development should maintain an appropriate quantum of car parking and enhance the setting of Elliot Hall, together with other listed buildings. Development should also have regard to securing an appropriate built context for the adjoining green belt, and to minimising impacts on the site of importance for nature conservation.</p>

**Site O14 – Vernon Lodge**



Site information	
Address:	Vernon Lodge, 654 Kenton Lane, Harrow Weald
Area:	0.36 ha
Description	The site contains a purpose-built two-storey temporary housing development owned by Harrow Council. The surrounding area is generally suburban, with a mix of housing typologies, a public house, neighbourhood parade and allotment gardens.
Current use	Vacant former hostel accommodation
Ownership	Council / Private (subject to sale)
PTAL	1b
Site source	Call for sites
Relevant planning applications	
Site allocation	
Site objective	Redevelopment of the site to provide specialised older persons accommodation
Allocated use	<b>Leading land use</b> Specialist older persons accommodation
Development timeframe	1 - 5 years
Indicative residential capacity	56 Specialist older persons accommodation
Planning considerations	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site

Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Specialised older persons accommodation Flood risk mitigation
Development principles	<p>Redevelopment of the site should provide for a specialist older persons development that responds to the local context within which it is located.</p> <p>Any new development that would result in a change of use away from the existing authorised hostel use on site must demonstrate the release from this use in accordance with the Development Plan.</p> <p>The Council recognises that the site is not located in a highly sustainable location, and therefore any new development must contribute to sustainable transport improvements &amp; support measures as set out in the Council’s Long Term Transport Strategy and Local Implementation Plan</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>The site is located in a predominately residential area and any new development should be progressed following the guidance set out in the Tall Building SPD (Building Heights) SPD (2023).</p>

**Site O15 – Belmont Clinic**



<b>Site information</b>	
Address:	Belmont Health Centre, 516 Kenton Lane, Harrow Weald
Area:	0.37 ha
Description	The site is an existing medical centre within the Belmont Local Centre. The site is surrounded predominantly by suburban dwellings, with the St Joseph’s Primary School opposite. The Belmont Trail runs alongside the eastern boundary of the site.
Current use	Medical centre
Ownership	Public
PTAL	2
Site source	Allocation in Harrow Site Allocations Local Plan (2013)
Relevant planning applications	
<b>Site allocation</b>	
Site objective	Redevelopment of the site to provide a modernised health care facility.
Allocated use	<b>Leading land use</b> Health care centre <b>Supporting land use(s)</b> Community or town centre uses Residential
Development timeframe	11 - 15 years
Indicative residential capacity	N/A

<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	Town Centre Boundaries (Belmont) RAF Northolt Safeguarding Zone Sites of Importance for Nature Conservation (The Rattler including Belmont Nature Walk) adjoins to the east
<b>Development considerations</b>	
Requirements	Reprovision of modern health centre Enhancement to Belmont Trail
Development principles	<p>The redevelopment of the site may form part of a mixed use scheme which incorporates other community uses and/or town centre uses appropriate to the scale and role of this local centre.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>The Belmont Trail runs alongside the eastern boundary of the site. The Trail is an important part of Harrow's Green Grid and the adjacent section (including the Belmont local centre car park) forms part of a designated green chain and site of importance for nature conservation. The design and layout of proposals should therefore maintain the integrity of the Trail and enhance its biodiversity value along the boundary.</p>

**Site O16 – Travellers Rest, Kenton Road**

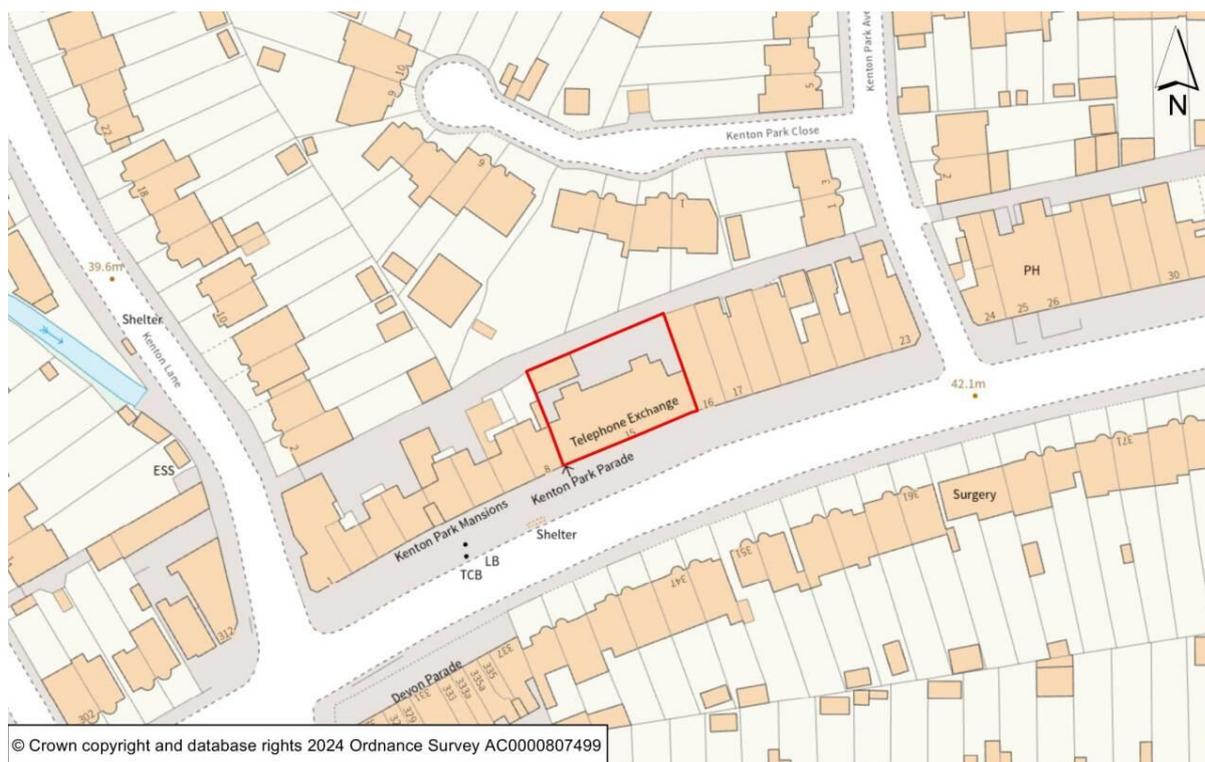


<b>Site information</b>	
Address:	Travellers Rest, Kenton Road, Kenton
Area:	0.69 ha
Description	<p>The Site contains a collection of two-three storey buildings that are currently in operation as public house (Beefeater) on Kenton Road and a hotel (Premier Inn) with hard standing areas used for car parking to the rear. It is located on the junction of Kenton Road and Carlton Avenue, and is adjacent to Kenton Underground and Overground Station.</p> <p>It is within the Kenton Road District Town Centre, which is generally characterised by 2-3 storey building with town centre commercial uses on ground floor and residential on upper floors. The only exception is the recently completed mixed use development adjacent to the station that is 3-6 storey in height.</p> <p>A number of sites within proximity to it have been developed in recent years and a major redevelopment/regeneration is proposed by the Brent Local Plan for Sainsbury supermarket site allocation (directly opposite it).</p>
Current use	<ul style="list-style-type: none"> <li>- Hotel</li> <li>- Public house with expanded food option</li> </ul>
Ownership	Private
PTAL	5 - 6a
Site source	Call for sites
Relevant planning applications	
<b>Site allocation</b>	
Site objective	A mixed-use development that re-provides a Public House and Hotel within the Kenton District Town Centre, with an enabling residential element.

Allocated use	<p><b>Leading land use</b> Hotel Public house Residential</p> <p><b>Supporting land use(s)</b> Town centre uses</p>
Development timeframe	1 - 5 years
Indicative residential capacity	109 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	Town Centre Boundaries (Kenton) RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Re-provision of hotel use on site Re-provision of public house on site Retention of trees protected by Tree Preservation Orders (TPOs).
Development principles	<p>The site is located within the Kenton District Town Centre and currently is in use as a Travellers Rest Beefeater Public House and a Premier Inn Hotel. The site is rectangular in shape, extending northwards with Carlton Road to the east and the Main Trunk train Line and London Underground / Overground train line to the west.</p> <p>The shape and size of the site would allow for a major mixed use scheme to be delivered on site.</p> <p>Any new development must seek to reprovide the public house and hotel offer on site. Public Houses provide an important element in British culture and also provide an important contribution to town centres. Public houses can play a valuable role in the local community as an informal meeting place and can provide a range of community functions. They also provide an offer to support the evening economy with a centre. Kenton has a very poor offer of pubs and bars and sits well below the UK average, with only one public house identified in 2023.</p> <p>The site can be regarded as an undesignated heritage asset, specifically the 1933 Tudor Revival style Travellers Rest hotel and former off-licence adjacent by Robert George Muir, which have key historic interest as an emblematic reminder of the growing suburban Metroland development of the 1930s that Harrow is known for, and of changing social values and social reform of the time that created 'the Improved Public House'. Any proposals would therefore need to have regard to heritage in accordance with the National Planning Policy Framework, the London Plan and heritage policies within this Local Plan.</p> <p>There is a need across both London as a whole and Harrow for tourism infrastructure, specifically with regard to hotels / serviced apartments. The</p>

	<p>site is in a highly sustainable location and has excellent public transport links to Wembley and Central London.</p> <p>Given the size of the site, an element of residential development is able to be delivered on site in conjunction with the above requirements, and may be capable of providing more height than which exists in the surrounding area. Whilst the size of the site would allow for more height, care must be taken to respect the much lower form of development, particularly along Carlton Avenue which is represented by two-story dwellings. Any new residential development must demonstrate a high quality of amenity, with particular care in relation to noise and vibration caused by the railway line along the western boundary of the site.</p> <p>Any new development that involves demolition of the existing buildings and new build, must provide an appropriately designed frontage to Kenton Road. This must include both in terms of an active frontage appropriate to a town centre, but also the relationship with Kenton Road, which is a busy carriage way directly adjacent to the site.</p> <p>The site is located in a mixed-use area but within a suburban context, any new development should be progressed following the guidance set out in the Tall Building SPD (Building Heights) SPD (2023).</p>
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**Site O17 – Kenton Road Telephone Exchange**



Site information	
Address:	9-15 Kenton Park Parade, Kenton Road, Kenton
Area:	0.08 ha
Description	The site contains a large building within Kenton Park Parade and makes an attractive contribution to the street scene. It sits within a parade of shops. The south side of Kenton Road is within the London Borough of Brent, and has a mixed character of two-storey semi-detached dwellings and shopping parades.
Current use	Telephone exchange
Ownership	Private
PTAL	3
Site source	Call for sites
Relevant planning applications	
Site allocation	
Site objective	A residential-led development that retains the attractive frontage of the Kenton Park Parade with an appropriate town centre or community use on the ground floor.
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Town centre uses Community uses
Development timeframe	6 - 10 years

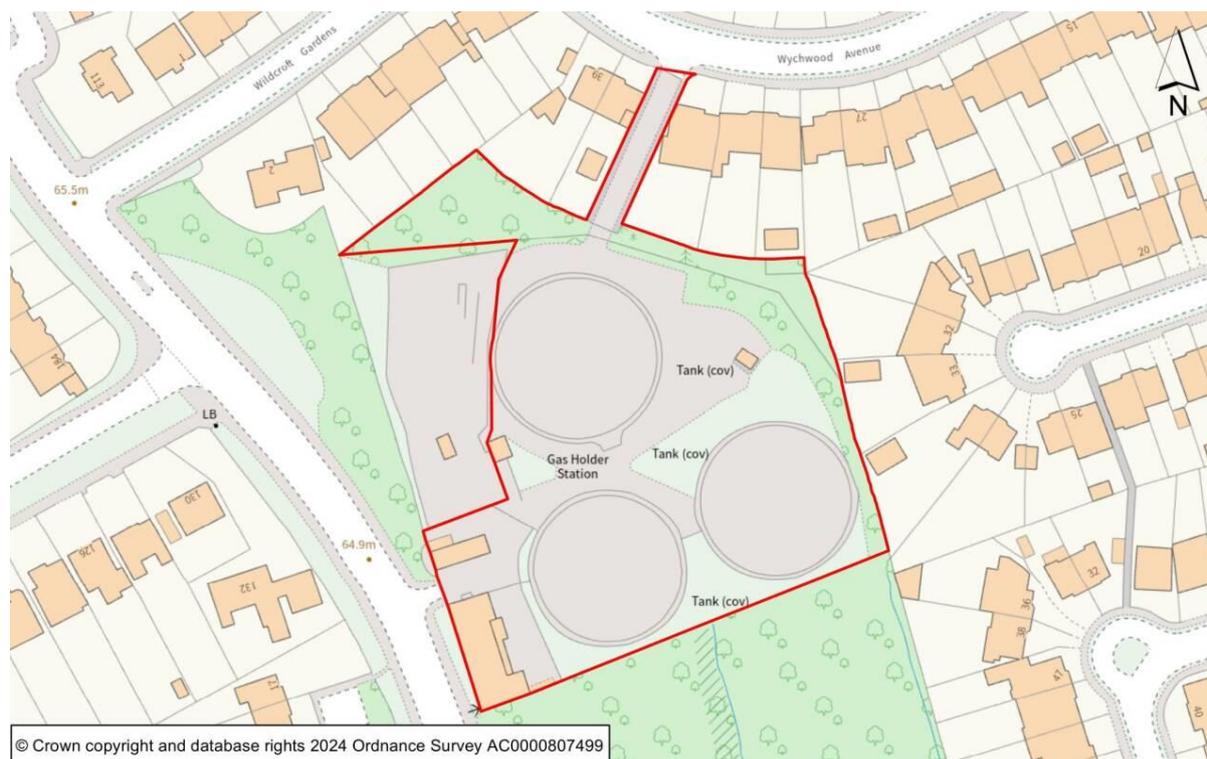
Indicative residential capacity	12 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone 2 - Part of site Flood zone (Surface Water) 3a - Part of site
Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Retention of frontage (with minor alterations on ground floor) Ground floor active frontage with appropriate town centre or community use.
Development principles	<p>The Kenton Road Telephone Exchange forms an attractive building within the neighbourhood parade within Kenton Park Parade.</p> <p>New development should seek to retain the building with a change of use to residential. To facilitate the change of use, the ground floor should be sensitively altered to enable residential use of the upper floors, and to enable a ground floor active frontage to facilitate an appropriate town centre use.</p> <p>Any development that seeks demolition should retain the existing frontage as this forms an attractive contribution within the parade.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>An opportunity exists for upward extension where this is done sensitively in relation to the impact this would have on the frontage of the building, and relationship with the surrounding urban fabric.</p>

**Site O18 – Wolstenholme**

<b>Site information</b>	
Address:	Wolstenholme, Rectory Lane, Stanmore
Area:	0.25 ha
Description	Sheltered accommodation within a late Victorian/Edwardian villa fronting Rectory Lane and a two-storey, staggered 1970/80s complex to the rear
Current use	Sheltered housing for older people
Ownership	Private
PTAL	1b
Site source	Allocation in Harrow Site Allocations Local Plan (2013)
Relevant planning applications	- Lapsed permission for redevelopment (P/5758/17)
<b>Site allocation</b>	
Site objective	Redevelopment to provide replacement housing for older people to modern standards
Allocated use	<b>Leading land use</b> Specialist older person housing
Development timeframe	11 - 15 years
Indicative residential capacity	Net 25 C2 residential institution units
<b>Planning considerations</b>	
Flood zone	
Heritage	Listed Buildings (Church of St John, Old Stanmore Church, multiple memorials, graves and tombs) opposite site

	<p>Conservation Area (Old Church Lane Conservation Area Stanmore) adjoins site</p> <p>Protected Views Restricted Corridor (Stanmore Country Park Extension Wood Farm)</p> <p>Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)</p>
Other	<p>Site of Importance for Nature Conservation (St John the Evangelist) adjoins site</p> <p>RAF Northolt Safeguarding Zone</p>
<b>Development considerations</b>	
Requirements	
Development principles	<p>The site is suitable for redevelopment to provide replacement sheltered housing to modern standards of comfort and accessibility.</p> <p>This is a long, narrow site and care will be needed to preserve and enhance the adjoining conservation area (which includes a number of mature trees at the boundary) and to safeguard the amenity of occupiers of property which face the site at the neighbouring Stanmore Park development.</p> <p>The design and layout of development on this site must be sensitive to the setting of the adjoining conservation area and the grade II listed Church of St John the Evangelist which faces the site, and should ensure the protection of the adjoining boundary wall.</p>

**Site O19 – Marsh Lane Gas Holders**



<b>Site information</b>	
Address:	Gas Works, Marsh Lane, Stanmore
Area:	0.88 ha
Description	A former gasholder site on Marsh Lane that has been cleared of any structures. This is woodland around the south and west of the site, with back gardens of houses to the east and north. Retained gas infrastructure is located immediately to the west of the site, with access via the subject site
Current use	Former gas holders site, currently unused
Ownership	Private
PTAL	2
Site source	Call for sites
Relevant planning applications	- Permission for infilling of former gas-holder bases (P/1088/20) - Revocation of hazardous substances consent (P/2536/22)
<b>Site allocation</b>	
Site objective	Redevelopment of the site to deliver housing
Allocated use	<b>Leading land use</b> Residential
Development timeframe	6-10 years
Indicative residential capacity	70 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site

Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	Site of Importance for Nature Conservation (Stanmore Marsh) adjoins site RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Improvements to Stanmore Marsh
Development principles	<p>The site is a former gas holder site which has now been decommissioned with some ancillary infrastructure on the western boundary. Redevelopment of the site will need to have regard to any requirements associated with this infrastructure, including access easements (including a requirement for 24 hour 7-day-a-week access for heavy goods vehicles from Marsh Lane, as well as access from Wychwood Avenue) and a no-build easement along the western boundary of the site.</p> <p>The site is located within a generally suburban area, and therefore suitable for new residential development. New residential development should be delivered in a manner that relates sensitively to the wider area, and provide a satisfactory level of carparking. Given the context of the site, it would be suitable for self-build housing provided this resulted in the efficient and optimal use of the site and met any requirements in relation to gas infrastructure.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>To the south of the site is Stanmore Marsh (with a small element to the west) which is a Site of Importance for Nature Conservation. All new development must be designed in a manner that addresses such a sensitive receiving environment in terms of light spill and other potential impacts on Stanmore Marsh.</p> <p>New development should refer to the Harrow Tall Building (Building Heights) SPD 2023.</p>

**Site O20 – Canons Park Station Carpark**



<b>Site information</b>	
Address:	Car Park Rear of Canons Park Station, Donnefield Avenue, Canons Park
Area:	0.43 ha
Description	A long and narrow commuter carpark for Canons Park Station. It is between 3-storey flat buildings (to the east) and the railway line, with Canons Park to the north.
Current use	Surface level carpark
Ownership	Public
PTAL	2 - 3
Site source	Call for sites Allocation in Harrow Site Allocations Local Plan (2013)
Relevant planning applications	- Former application for residential accommodation refused (P/0858/20) and dismissed at appeal.
<b>Site allocation</b>	
Site objective	Housing development which improves access to Canons Park Station, while providing a sufficient level of car parking associated with the station and the development itself.
Allocated use	<b>Leading land use</b> Residential Car parking
Development timeframe	6-10 years
Indicative residential capacity	26 C3 dwelling houses / units
<b>Planning considerations</b>	
Flood zone	

Heritage	Conservation Areas (Canons Park Estate Conservation Area) Registered Parks and Gardens adjoins site
Other	Site of Importance for Nature Conservation (Canons Park and Stanmore Railway Embankments) adjoins site RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	
Development principles	<p>The site is suitable for partial residential development with retention of an appropriate amount of station car parking to help meet demand generated by commuters. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the retention or re-provision of car parking capacity on the site or elsewhere.</p> <p>To the north of Donnefield Avenue is Canons Park, designated as a Registered Historic Park and Garden (which is also part of the Canons Park Estate Conservaton Area). The park also contains several statutory listed buildings and structures.</p> <p>Both Canons Park and the railway embankment form a part of a Site of Importance for Nature Conservation (borough importance Grade II). The design and layout of development on the site should be sensitive to these designations and to the amenities of occupiers of residential property on the opposite side of Donnefield Avenue.</p> <p>As the site is adjacent to London Underground infrastructure, early consultation with Transport for London’s infrastructure protection team will be required.</p> <p>New development should refer to the Harrow Tall Building (Building Heights) SPD 2023.</p>

**Site O21 – Anmer Lodge**



Site information	
Address:	Anmer Lodge, Coverdale Close, Stanmore
Area:	1.37 ha
Description	Car parks located in the Stanmore Town Centre behind buildings on the Broadway and Stanmore Hill.
Current use	Car parking
Ownership	Private
PTAL	2 - 3
Site source	Allocation in Harrow Site Allocations Local Plan (2013)
Relevant planning applications	- Permission for mixed use redevelopment including residential and retail food store (P/0412/14) - Permission for redevelopment on land in western part of site P/3109/20
Site allocation	
Site objective	Mixed-use development of this under-utilised town centre site which includes a supermarket as well as a suitable level of residential use, while re-providing an appropriate level of car parking.
Allocated use	<b>Leading land use</b> Residential <b>Supporting land use(s)</b> Town centre uses Car parking
Development timeframe	1-5 years
Indicative residential capacity	141 C3 dwelling houses / units

<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	Town Centre Boundaries (Stanmore) Primary Shopping Area RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Appropriate level of replacement car parking for the town centre Supermarket (1600sqm)
Development principles	<p>The site is suitable for mixed-use development to accommodate a moderately sized supermarket and a community use.</p> <p>The boundary of Stanmore district centre is contiguous with the north side of the car park, and the retail/any other town centre uses should therefore be located within the southern half of the site.</p> <p>Residential development of a form and density suitable to this town centre location should form part of the mix on the southern part of the site. More traditional residential development, which reflects the context created by existing housing in Coverdale Close, is likely to be appropriate to the north of the site.</p> <p>Development of the site must ensure that the retail and any other town centre components are properly related to existing frontage in The Broadway, and that satisfactory arrangements for the servicing of these uses are made.</p> <p>There is a significant fall in site levels from north to south which will need to be addressed in a way which secures the implementation of Green Grid projects to enhance links between the Belmont Trail and the Green Belt.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>A significant portion of the site is located within Stanmore District Town Centre, and accordingly is an appropriate location for town centre uses as part of any comprehensive development of the site. Such floorspace should be commensurate to the scale and function of the centre.</p> <p>The site is currently divided into two different parcels each of which contains a car park. The design of any proposal should maximise the capacity of the whole site and ensure that a unified design can be achieved.</p> <p>New development should refer to the Harrow Tall Building (Building Heights) SPD 2023.</p>

**Site O22 – Stanmore Station Carpark**



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<b>Site information</b>	
Address:	Stanmore Station Car Park, London Road, Stanmore
Area:	1.39 ha
Description	This site is used as a car park for the adjacent Stanmore Underground Station. It is located within proximity to Stanmore District Centre (400m). The site is long and narrow and lies between the railway depot and the back gardens of houses and a school (to the east).
Current use	Surface level carpark
Ownership	Public
PTAL	2 - 3
Site source	Call for sites Allocation in Harrow Site Allocations Local Plan (2013)
Relevant planning applications	- Former application for residential accommodation withdrawn (P/1221/20)
<b>Site allocation</b>	
Site objective	Housing development which improves access to Stanmore Station, while providing a sufficient level of car parking
Allocated use	<b>Leading land use</b> Residential Car parking
Development timeframe	6-10 years
Indicative residential capacity	183 C3 dwelling houses / units

<b>Planning considerations</b>	
Flood zone	Critical drainage area Flood zone (Surface Water) 3a - Part of site
Heritage	Locally Listed Building (Stanmore Station) adjoins site Conservation Area (Kerry Avenue Conservation Area) adjoins site
Other	Site of Importance for Nature Conservation (Canons Park and Stanmore Railway Embankments) adjoins site RAF Northolt Safeguarding Zone
<b>Development considerations</b>	
Requirements	Reprovision of suitable level of car parking for commuters and in connection with major events at Wembley Stadium Step -free access to Stanmore Station
Development principles	<p>The site is suitable for partial residential development with reprovision of an appropriate amount of station car parking to help meet demand generated by commuters and in connection with major events at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.</p> <p>Redevelopment of the site should facilitate step-free access to Stanmore Station, both from London Road and from the retained or replacement car-parking facility.</p> <p>There is a significant fall in site levels away from London Road, which bounds the site to the north. This should be considered in development design.</p> <p>Part of the site is subject to floodrisk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>The southern boundary of the site is contiguous with the northern boundary of a small, wooded area which forms a part of a Site of Importance for Nature Conservation; the design and layout of development must be sensitive to this nature conservation site.</p> <p>The setting of the adjoining Kerry Avenue Conservation Area and locally listed Stanmore Station should be considered.</p> <p>As the site is adjacent to London Underground infrastructure, early consultation with Transport for London's infrastructure protection team will be required.</p> <p>New development should refer to the Harrow Tall Building (Building Heights) SPD 2023.</p>

# Appendices:

## Appendix 1: Glossary

Term	Definition
Affordable housing	Housing for sale or rent for those whose needs are not met by the market. See the NPPF or London Plan Policy H4. See also genuinely affordable housing.
Agent of change principle	The principle places the responsibility of mitigating the impact of nuisances (including noise) from existing nuisance generating uses on proposed new development close by, as discussed in the London Plan Policy D13.
Amenity	Element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.
Amenity space	Outdoor areas or open spaces within a scheme that enhance the quality of life and well-being of residents. These spaces may provide recreational, leisure and social benefits and can be private or communal.
Area of special character	Designated places which are protected from inappropriate development, reflecting the significance of their character and setting including to the borough as a whole.
Article 4 direction	A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.
Backland	Sites that are located to the rear of street frontages not historically in garden use. In suburban areas typically vacant open sites behind regularly arranged residential properties.
Beneficial use (green belt and MOL)	Uses that align with the character of, and/or the public's access to and enjoyment of, the green belt and metropolitan open land.
Biodiversity offsets	Measures to improve existing or create replacement habitat where there are unavoidable impacts on wildlife habitats resulting from development or change of land use.
Biodiversity	This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.
Build to rent	Purpose built housing that is typically 100% rented out, offers long-term tenancies of three years or more, in under single ownership and is professionally managed. Refer to London Plan Policy H11 for further details and criteria.
Car club	A short-term car rental service that allows members access to cars parked locally for a per-minute, per-hour or per-day fee.

<b>Term</b>	<b>Definition</b>
Care home	Homes where older people live in non-self-contained rooms with personal care and accommodation provided together as a package with no clear separation between the two. Residents cannot choose to receive care from another provider. Different types of care homes provide different levels of care, ranging from personal care to nursing care.
Circular economy	An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.
Community-led housing schemes	Schemes that are genuinely community-led all share three common principles: meaningful community engagement and consent occurs throughout the development process (communities do not necessarily have to initiate the conversation, or build homes themselves); there is a presumption that the community group or organisation will take a long-term formal role in the ownership, stewardship or management of the homes; and the benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity.
Conservation area	An area of special architectural or historic interest whose character or appearance is protected for its heritage significance.
Cultural and creative industries	Those industries which have their origin in individual creativity, skill and talent which have a potential for wealth and job creation through the generation and exploitation of intellectual property.
Cultural uses/facilities	Facilities that support the operation of creative industries, particularly through performance, exhibition or performance for example galleries, theatres and museums.
Digital/communications infrastructure	Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.
District centres	As defined in Annex 1 of the London Plan, a town centre providing convenience goods, services and social infrastructure focussed on the local community, typically with 5,000 - 50,000 sqm of retail, leisure and service floorspace.
District heating network	A network of pipes carrying hot water or steam, usually underground, that connects heat production equipment with heat customers. They can range from several metres to several kilometres in length.
Ecosystem services	Direct and indirect contributions to human wellbeing and quality of life provided by the natural environment and ecosystems.
Edge of centre	For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary.

<b>Term</b>	<b>Definition</b>
Employment land	Land supporting employment uses including in town centres, neighbourhood parades and industrial land.
Enabling development	Development that would not be in compliance with local and/or national planning policies except for the fact that it would secure the future conservation of a heritage asset.
Extra care accommodation for older people	A form of sheltered housing for older people who are becoming frailer and less mobile and have higher support and care needs than those that can be met in general needs or sheltered housing. It contains self-contained homes and communal facilities, and has with design features and care and support services which enable self-care and independent living. This form of housing enables older people with a wide range of needs to remain living independently in the community, whilst being able to access care from staff available 24 hours per day if needed.
Family homes	Housing that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five or more bedrooms.
Flood risk assessment	An assessment of the likelihood of flooding in a particular area (usually a specific site) so that development needs and mitigation measures can be carefully considered.
Foyer accommodation	A type of secure accommodation for disadvantaged, vulnerable individuals that includes support for personal development and encourages independent living.
Garage sites/courts	Garages are buildings with a narrow massing which are designed to house vehicles, often with hardstanding for turning vehicles. Garage sites/courts house multiple garages and are typically located in residential areas and estates.
Garden land	Garden land means any land within the curtilage of a building the principal use of which is residential, in particular to the rear of the site.
Genuinely affordable housing	Housing which is demonstrably affordable to low and middle income earners in Harrow, with housing costs not exceeding an appropriate proportion of typical household incomes in the Borough (in line with standards in the London Plan). Typical tenure types regarded as genuinely affordable are defined in the London Plan.
Green Belt	A nationally designated area of open land around London. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. There is a general presumption against inappropriate development in the Green Belt.
Green grid	A network of interconnected green spaces and features throughout Harrow and Greater London.

<b>Term</b>	<b>Definition</b>
Green infrastructure	A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.
Green roofs and walls	Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.
Greening	The improvement of the appearance, function and wildlife value of the urban environment through use of vegetation or water.
Gypsies and travellers	Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.
Habitable room	A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, corridors, hallways, utility rooms or similar should not be considered habitable rooms.
Heritage asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
Hostels	A building providing temporary non-self-contained residential accommodation with an element of supervision, but with no significant degree of care. This does not include 'youth hostels' as these are a type of visitor accommodation (C1 Use Class).
Houses in multiple occupancy (HMOs)	Dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet. HMOs for between three and six people are classed as C4 (except for areas affected by an Article 4 Direction) whereas HMOs for more than six people are Sui Generis.
Inclusive access	An approach to the design of buildings which means that people with different levels of mobility can access the space.

Term	Definition
Inclusive neighbourhood	An inclusive neighbourhood is one in which people can live and work in a safe, healthy, supportive and inclusive environment. An inclusive neighbourhood will ensure that people are able to enjoy the options of easy access by public transport and active travel modes (walking and cycling), to services and facilities that are relevant to them. It will also allow people to safely and easily move around their neighbourhood through high quality people focused spaces, while enjoying barrier free access to surrounding areas and the wider city. They should have safe and easy access to a network of open spaces which meet their recreational needs to enhance health and wellbeing, as well as welcoming easily accessible communal spaces which provide opportunities for social interaction.
Infill/gap site development	Development of derelict sites or unattended sites. The scale of these sites tends to align with the urban grain and surrounding developments. Many of these sites are situated in residential suburban streets.
Intermediate housing	Homes for sale or rent provided at a cost above social rents but below market levels, at a price which is affordable to those who are not eligible for social rent but still have difficulty accessing the private market. These can include shared equity products (e.g. HomeBuy), other low cost home ownership products and intermediate rent.
Large-scale purpose-built shared living (LSPBSL)	A purpose-building managed rental development containing non-self-contained units and extensive communal spaces and facilities, with the entire facility under single professional management.
Local and neighbourhood centres	As defined in Annex 1 of the London Plan, small town centres with a localised catchment.
Locally significant industrial sites	A Local Plan designation for land and premises that hold local importance for industrial and related functions within the borough.
London affordable rent	Rents for London Affordable Rent homes are capped at benchmark levels published by the GLA intended to be genuinely affordable. See Policy H16 of the London Plan.
London living rent	An intermediate housing product offering a lower rent to house on average incomes to enable them to save for a deposit.
Major centres	As defined in Annex 1 of the London Plan, a town centre with a borough-wide catchment generally containing over 50,000sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods to convenience goods.
Major development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floor space of 1,000m <sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

<b>Term</b>	<b>Definition</b>
Market housing	Private housing for rent or sale where the price is set in the open market.
Meanwhile use	Temporary or short-term use of vacant space of land for a socially beneficial purpose until such time that they can be brought back into commercial use.
Metroland	A name given to the suburban areas that were built to the north-west of London in the early part of the 20th century that were served by the Metropolitan Railway. Suburban development also accompanied the extension of the Bakerloo Line (now the Jubilee) to Stanmore and the Piccadilly Line (by 1933). Almost two-thirds of Harrow's housing stock dates from the inter-war period. This 'Metroland' housing continues to be one of the principal characteristics of Harrow's suburbs, particularly to the south east and south west of the borough. Large areas were developed by private developers at various densities and architectural styles - detached, semi-detached and short terraces of homes.
Metropolitan centres	As defined in Annex 1 of the London Plan, a town centre with a catchment extending over multiple boroughs generally containing at least 100,000sqm of retail, leisure and service floorspace with a high proportion of high-order comparison goods to convenience goods.
Metropolitan Open Land	Extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt and is protected from inappropriate development by land-use planning policies.
Mixed-use schemes	Development for a variety of activities on single sites.
Natural capital	The stock of natural assets and resources that provide a wide range of benefits to both the environment and society, including ecosystems, biodiversity, air and water quality, soil health and landscapes.
Neighbourhood parade	Purpose-built small rows of shops along a road and outside of larger designated town centres, serving the convenience retail and other day-to-day needs of the immediate neighbourhood.
Net-zero carbon building	A building which does not burn fossil fuels, has ultra-high energy efficiency and is 100% powered by renewable energy
Night-time economy	The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am, and includes evening uses. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport and medical services, which employ a large number of night-time workers.
Non-designated open space	Open pockets of land which are located within residential areas (particularly in estates). Many such spaces consist of underutilised grassed areas serving little or no purpose.

Term	Definition
Older people	People over or approaching retirement age, including the active, newly- retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.
Open space	All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space, whether in public or private ownership and whether public access is unrestricted, limited or restricted.
Opportunity area	Designated areas from the London Plan regarded as London’s principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, with a mixed and intensive use of land and assisted by good public transport accessibility. Table 2.1 in the London Plan provides indicative targets for the Harrow and Wealdstone Opportunity area of 5,000 homes and 1,000 jobs.
Out of centre	A location which is not in or on the edge of a centre.
Out of Centre Impact Assessment	An assessment of a retail or leisure use proposed in an out of centre location and would be of 400sqm or more of floorspace. Such an assessment shall consider a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)
Planning obligations	Legal agreements entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal
Previously developed land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure, or as otherwise provided in national policy. This excludes certain land such as land in built up areas such as residential gardens, parks, recreation grounds and allotments.
Protected views	Views seen from places that are publicly accessible and well used and make a significant contribution to the image and character of Harrow. Their significance merits their protection in the Local Plan.
PTAL	A measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. PTAL levels are calculated by Transport for London and can be viewed on the TfL website ( <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat">https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat</a> )

<b>Term</b>	<b>Definition</b>
Public realm	Publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces.
Purpose-built student accommodation (PBSA)	Housing dedicated, at least in term time, to full-time students. It may be new-build or converted from other uses. The majority of the bedrooms in the development should be secured via a nomination agreement for the occupation by student of one or more higher education providers. See policy H15 of the London Plan for further information.
Scheduled monuments	Scheduled monuments are nationally important monuments that have been afforded statutory protection through their inclusion in the Schedule of monuments maintained under section 1 of the Monuments and Archaeological Areas Act 1979.
Secure by design	An approach to development design that works to improve the security of buildings and their immediate surroundings in line with published standard.
Self-build housing and custom-build housing	Defined in the Self-build and Custom Housebuilding Act 2015. Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing.
Sequential Test	Planning policies that require particular steps to be taken, or types of location or sites to be considered, in a particular order of preference. Defined in the National Planning Policy Framework, paragraph 91 in relation to planning applications for town centre uses and paragraph 167 in relation to flood risk.
Setting of a heritage asset	The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
Shared ownership	An intermediate housing product which allows households who would struggle to buy on the open market to purchase a share in a new home and pay a low rent on the remainder.
Sheltered accommodation for older people	Self-contained accommodation specifically designed for older people who require no or a low level of support. Schemes normally include additional communal facilities such as a residents' lounge and a scheme manager, warden or personal alarm/telecare system.
Short-stay holiday rental accommodation	Self-contained residential accommodation rented out for periods of less than 90 nights, typically to visitors or tourists.
Small sites	Housing development sites of 0.25ha or less in area as defined by policy H2 of the London Plan.

Term	Definition
Social infrastructure	Facilities providing a wide variety of services that are essential to the sustainability and wellbeing of a community such as education facilities, places of worship, burial space, policing and justice, health provision, community, polling stations, cultural, public houses, recreation and sports facilities. This list is not intended to be exhaustive and other facilities may be included.
Social rented housing	Low cost rented housing provided, typically by councils and housing associations, to households whose needs are not met by the market. Rents are set within guidelines issued by the social housing regulator and are usually significantly less than 80% of market rents.
Specialist older persons accommodation	A term used to describe a range of types of housing, not including care homes, that enables older people to live independently in self-contained living spaces with the possibility of some communal facilities and varying levels of support if needed. This can include retirement living, sheltered housing for older people, extra care housing, care villages and continuing care retirement communities.
Strategic Industrial Locations	Sites designated in the London Plan as those which are part of London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.
Supported and specialist accommodation	A variety of forms of housing which purports to meet the needs of those within specific groups of people. Suitability of specialist housing is informed by specific identified needs.
Sustainable urban drainage systems	Systems which are designed to manage stormwater locally (as close to its source as possible), to mimic natural drainage and encourage its infiltration, attenuation and passivate treatment.
Tall building	A building of 7 or more storeys or 21m or more of height from the ground level to the top of the building. Necessary paraphernalia such as plant and machinery typically located on the roof of a building is not included as part of this definition.
Threshold approach / Fast-track approach	Approach set out in London Plan Policy (see Policy H5) whereby development provides a preset proportion of housing as affordable housing and thereafter does not need to provide a viability assessment to determine the affordable housing contribution.
Tourism infrastructure	Facilities, services and amenities designed to meet the needs of tourists, principally visitor accommodation.
Town centre uses	Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<b>Term</b>	<b>Definition</b>
Town centres	Places providing access to a range of commercial, cultural and civic activities including shopping, leisure, employment, entertainment, culture and social and community facilities. The boundaries of town centres are defined in the policies map.
Transport assessment	A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development.
Travel plan	A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.
Windfall sites	Sites not specifically allocated in the development plan

## Appendix 2: Monitoring

- A.2.1 It is important to monitor the outcomes of development in the Borough to assess the effectiveness of the Local Plan in delivering its policies and objectives. The Authority Monitoring Report (AMR) is the main mechanism for monitoring of the Local Plan in line with statutory obligations. The AMR will provide a yearly snapshot of plan performance against a range of quantitative and qualitative indicators. The AMR will also monitor the overall level of development by type and its distribution across the Borough.
- A.2.1 AMR indicators will evolve over the duration of the plan and additional indicators may be added in the future or it may be necessary to modify some indicators in response to changes in data availability. Additional information and analysis may also be included, for example in cases where data is intermittently available, or where the additional information highlights issues which may impact on the delivery of the Local Plan.
- A.2.3 The AMR will not monitor every aspect of the Local Plan. Doing so would not be practical, and the volume of information required would detract from the provision of a clear and succinct statement of how the Local Plan is performing. Instead, the following sets of indicators have been created:
- (a) A set of key performance indicators (KPIs) have been created which capture the key aspects of successful implementation of the Local Plan's policies.
  - (b) Additional indicators which provide additional information or context and which illustrate the performance of specific parts of the Local Plan.
- A.2.4 The performance of the local plan will also be monitored through the maintenance of the housing trajectory, which is regularly updated to demonstrate Harrow's five-year housing supply.
- A.2.5 Given the wide range of issues covered by the Local Plan and the targeted selection of indicators to be included in the AMR, further analysis and monitoring regarding the Local Plan may also be carried out as part of the policy review process or where important issues are not otherwise addressed in the AMR.
- A.2.6 Key performance indicators and additional indicators are provided in the tables below.

### Key performance indicators

Indicator		Target
KPI1	<b>Supply of new homes over the plan period</b> Measured by housing completions and net pipeline of approved housing units	On track to exceed 16,040 homes between 2021-41
KPI2	<b>Supply of new affordable homes</b> % of total new housing supply by number of units and number of habitable rooms	50% of total new housing supply, measured by number of units and number of habitable rooms
KPI3	<b>Town centre vacancy rates</b> measured as % of centre frontage that is vacant	Remain below 7% Borough-wide and below 10% in each centre
KPI4	<b>Net loss of industrial floorspace or land</b>	No net loss (floorspace and premises)
KPI5	<b>Energy efficiency</b> Proportion of major applications meeting energy targets on-site (vs offsetting)	Energy efficiency targets from the Local Plan achieved, with offsetting in exceptional circumstances only.
KPI6	<b>Net-zero carbon</b> Proportion of major applications incorporating on-site energy generation to achieve net-zero carbon (vs offsetting)	All major developments are net-zero carbon, with offsetting used to achieve this in exceptional circumstances only.
KPI7	<b>Public transport accessibility</b> Proportion of new dwellings in PTAL 3+ or achieving PTAL 3+ through improvements to public transport service associated with development	Improvement on 2012-2024 baseline of 68% (or alternative value following updated methodology)

### Additional indicators

Indicator		Target	Relevant Policies
<b>General</b>			
<b>Appeals</b> allowed which contravene a strategic principle of the local plan, with major contraventions identified, including development: <ul style="list-style-type: none"> <li>- Adversely affecting local character or areas of special character</li> <li>- Harming protected views</li> <li>- Inappropriate garden development</li> <li>- Compromising heritage significance or setting</li> <li>- Inappropriate development in the green belt and MOL</li> <li>- Loss of Open Space</li> </ul>			Multiple
<b>High quality growth</b>			
GR-I1	<b>Tall buildings</b> Tall Buildings allowed inconsistent with policy	Number of speculative applications approved outside of Designated Tall Building Zones	GR4
<b>Heritage</b>			
HE-I1	Number of assets on the Historic England <b>Heritage ‘at risk’ register</b>	Reduction in assets at risk	HE1, HE2
<b>Meeting Harrow’s Housing Needs (in addition to KPIs 1-2)</b>			
HO-I1	<b>Bedroom mix</b> Mix of number of bedrooms in new housing	25% of new dwellings to be family housing (3+ bedrooms), or updated target following update in evidence base	HO1
HO-I2	<b>Bedroom mix – affordable housing</b> Mix of number of bedrooms in new affordable housing	In line with up to date Council requirements and evidence base	HO1, HO4
HO-I3	Number of dwellings delivered on <b>small sites</b>	At least 375 per year	HO3, GR10
HO-I4	Number of <b>family homes converted</b> into self contained residential units without re-provision of at least a 3-bedroom 4-person dwelling.		HO2
HO-I5	<b>Affordable housing tenure</b> Tenure mix of new affordable housing units	70% of units to be low cost rented and 30% intermediate, or updated %s following update in evidence base or policy	HO4
HO-I6	<b>Off-site affordable housing contributions</b> secured in lieu of on-site provision		HO4

Indicator		Target	Relevant Policies
HO-17	Number of <b>other dwellings delivered</b> by type including: <ul style="list-style-type: none"> <li>- C3 older persons units</li> <li>- Care homes</li> <li>- Supported and sheltered housing</li> <li>- Purpose built student accommodation</li> <li>- Large scale purpose shared living</li> <li>- HMOs</li> </ul>		HO6, HO7, HO8, HO9, HO9, HO10
HO-18	Progress towards meeting additional need for <b>gypsy and traveller accommodation</b>	12-13 additional pitches by 2041	
<b>Local economy (In addition to KPIs 3-4)</b>			
LE-11	Additional <b>employment generating floorspace</b> permitted or completed by type	Combined retail / cultural / leisure of 13,900 sq m and industrial of 6,000 sq m (subject to any subsequent evidence with respect to floorspace need). No Net Loss.	SP4
LE-12	Total amount of <b>office floorspace</b> and any change	No specific target but to monitor release from stock to determine any interventions if required (supply versus need).	LE1
LE-13	<b>Office vacancy rate</b>	Vacancy rate does not exceed the London average (as measured by the GLA)	LE1
LE-14	<b>Local employment</b> Job density, defined as number of jobs divided by number of people aged 16-64	Remain above 0.5 (ONS 2021 figure for Harrow)	SP4
<b>Community infrastructure</b>			
CI-11	Change in <b>community infrastructure provision</b>	No net loss of community infrastructure floorspace	CI1
<b>Green infrastructure</b>			
GI-11	Change in <b>green belt or metropolitan open space</b>	No loss of green belt or metropolitan open space	GI1
GI-12	Change in <b>open space</b>	No net loss of open space	GI2
GI-13	Proportion of new dwellings within walking distance of open space or delivering new open space through development	Improvement on 2012-2024 baseline (as provided below or updated with alternative methodology): <ul style="list-style-type: none"> <li>- 65% within 400m of park, garden or recreation ground of at least 1ha</li> </ul>	GI2

Indicator		Target	Relevant Policies
		- 91% within 800m of park, garden or recreation ground of at least 2ha	
GI-I4	Net gain in <b>Biodiversity</b> secured from new development over plan period	At least 15% net gain secured on new development (including offsetting) over plan period	GI3
GI-I5	<b>Urban Greening factor</b> on major developments	Meeting UGF of 0.4 (residential) and 0.3 (commercial)	G14
<b>Waste &amp; Circular Economy</b>			
CE-I1	Proportion of municipal <b>waste recycled or composted</b>	Positive trend (i.e. increase in percentage) year on year	CE1
<b>Transport &amp; Movement (in addition to KPI 7)</b>			
M-I1	Reduction in private vehicle <b>mode share</b>	Positive trend year on year	M1
M-I2	Increase in <b>EV Charging points</b> in new developments/public realm	Positive contribution to the Council's EV strategy targets	SP10

## Appendix 3: Protected Views

- A.3.1 The methodology for assessing the impact of proposals upon a landmark viewing corridor and wider setting consultation area is set out in the Mayor of London's London View Management Framework: Supplementary Planning Guidance (2012). Paragraph 18 of the SPG requires a planning application for a proposal affecting a view to be accompanied by an analysis that explains, evaluates and justifies any visual impact on the view. For the avoidance of doubt, this SPG will apply to Harrow's Protected Views as it does to a Designated View in the London Plan. For each relevant assessment point the analysis must include an accurate topographical survey and specify the height of the camera relative to the ground
- A.3.2 Harrow has 11 protected views which were assessed within the Harrow Views Management Guidance (June 2024) that forms part of the evidence base for the Local Plan. These eleven views are set out below and depicted in general terms on the following maps.
- A.3.3 The review of the protected views followed the relevant methodology as set out in the Mayor of London's London View Management Framework: Supplementary Planning Guidance (2012), It also followed the relevant policies within the London Plan (2021).
- A.3.4 Full details of the views for the purposes of applying Policy GR5: View Management are included in the Harrow Views Management Guidance (June 2024).

### **Protected views within an urban setting**

1. Harrow View
2. Roxborough Road Bridge
3. St. Ann's Road
4. Gayton Road

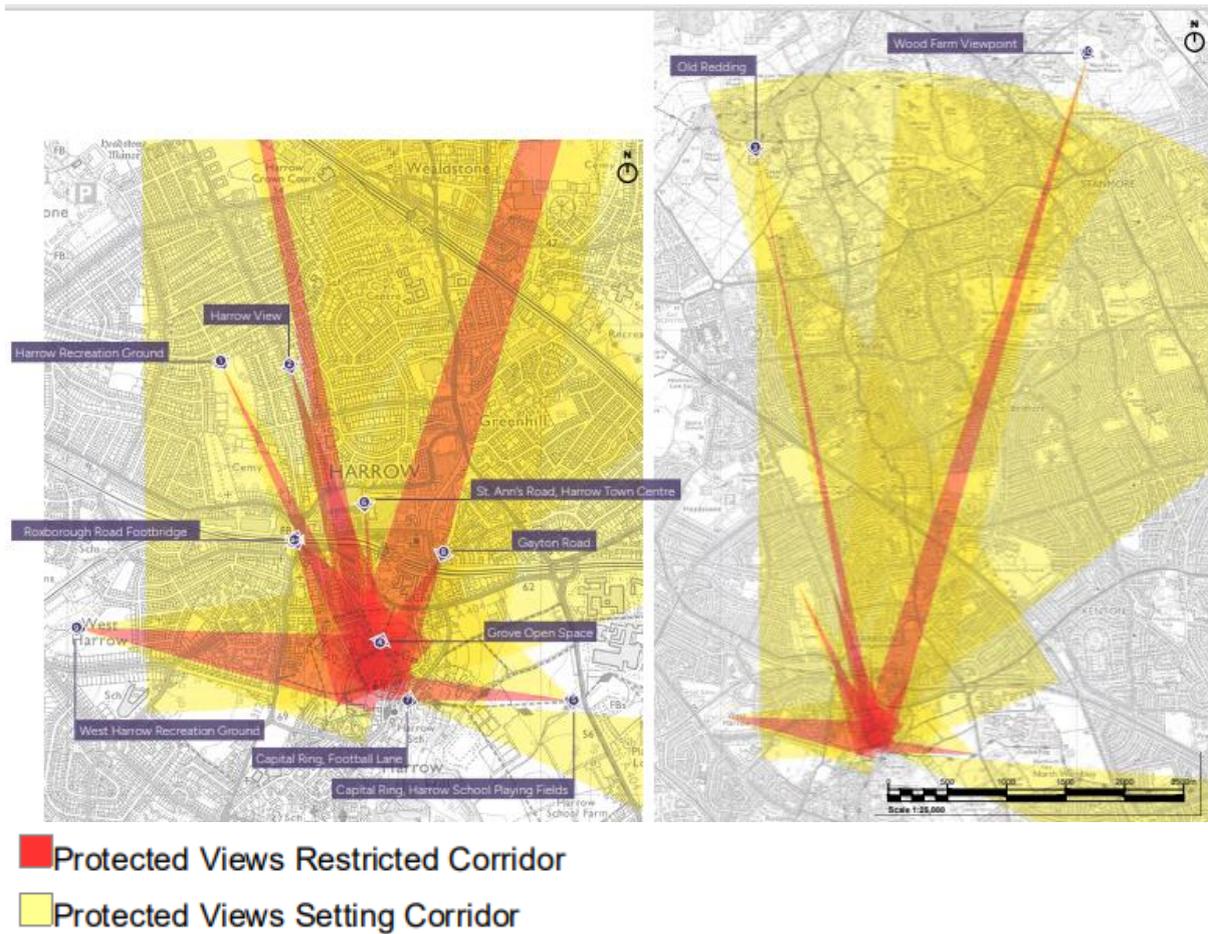
### **Protected medium-range views from open space**

5. Capital Ring, Harrow School Playing Fields
6. Harrow Recreation Ground
7. West Harrow Recreation Ground

### **Protected long-range views from open space**

8. The Grove
9. Capital Ring, Football Lane
10. Old Redding
11. Stanmore Country Park Extension, Wood Farm

### Protected Views in Harrow (refer Policy GR5: View Management)



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## Appendix 4: Town Centre Hierarchy

### Harrow Town Centres and Neighbourhood Parades

- A.4.1 Annex 1 to the London Plan (2021) identifies a hierarchy of centres, based on size, role and function, for London’s town centre network. The hierarchy is as follows:
- (a) International centres: the West End and Knightsbridge;
  - (b) Metropolitan centres: multi-borough catchments, 100,000m<sup>2</sup> retail floorspace including a high proportion of comparison shops, good accessibility and a mix of other employment and leisure uses present;
  - (c) Major centres: borough-wide catchment, 50,000m<sup>2</sup> retail floorspace including a high proportion of comparison shops, and may also have a mix of other employment, leisure or civic uses;
  - (d) District centres: district catchment, 10-50,000m<sup>2</sup> retail floorspace providing mainly convenience shops and local services or specialist functions;
  - (e) Local and neighbourhood centres: small centres or parades providing mainly convenience shops and walk-to services for a local catchment.
- A.4.2 The London Plan classifies Harrow town centre as a Metropolitan centre and Edgware town centre (located mainly within the London Borough of Barnet) as a Major centre. A further nine Harrow centres are classified in the London Plan as district centres, including Burnt Oak (which straddles the London Boroughs of Brent and Barnet), Kingsbury (located mainly within the London Borough of Brent) and Kenton (partly located within the London Borough of Brent).
- A.4.3 Local and neighbourhood centres are classified at borough level. In Harrow five centres have been classified as local centres.
- A.4.4 All town centres are listed below and are identified on the policies maps.

#### Town Centres

Town Centre	Classification	Notes / Cross boundary centres
Harrow Town Centre	Metropolitan	
Edgware (part)	Major	Mostly located within LB Barnet
Wealdstone	District	
South Harrow	District	
Rayners Lane	District	
North Harrow	District	
Pinner	District	
Stanmore	District	
Burnt Oak (part)	District	Parts also located within LB Brent and LB Barnet
Kingsbury (part)	District	Mostly located within LB Brent
Kenton (part)	District	Part also located within LB Brent
Sudbury Hill (part)	Local	Mostly located within LB Brent
Hatch End	Local	

Town Centre	Classification	Notes / Cross boundary centres
Harrow Weald	Local	
Queensbury	Local	
Belmont	Local	

### *Neighbourhood Parades*

- A.4.5 Neighbourhood parades do not form part of the main town centre network, however perform an important function particularly across the suburbs, where they provide small convenience shops and services. They typically serve a mainly 'walk to' catchment within the immediate locality in which they are situated and therefore contribute to more sustainable lifestyles as well as providing affordable premises for independent retailers and service providers.
- A.4.6 All general locations of all neighbourhood parades are listed below and are identified on the policies maps.

General Location	Classification
Harrow & Wealdstone	Headstone Drive/Headstone Gardens/Harrow View/The Quadrant
	Hindes Road/Headstone Road
	Station Road (between Harrow town centre and Wealdstone district centre)
Harrow-on-the-Hill and Sudbury Hill	Northolt Road (east of Brooke Avenue junction)
	Northolt Road (Roxeth Hill junction)
	Shaftesbury Circle
	High Street, Harrow-on-the-Hill*
South Harrow	Eastcote Lane/Field End Road
	Eastcote Lane (east & west of Kings Road junction)
	Alexandra Avenue (north of Eastcote Lane junction)
	The Heights/Dabbs Hill Lane
	Northolt Road (east of Petts Hill/Alexandra Avenue junction)
	Northolt Road (between Park Lane and Corbins Lane junctions)
Rayners Lane & North Harrow	Alexandra Avenue (southward continuation of Rayners Lane district centre)
	Headstone Lane (north of Parkfield Avenue junction)
	Pinner Road (between Pinner View and Devonshire Road)
	Vaughan Road (West Harrow)
	Blenheim Road (West Harrow)
Pinner & Hatch End	Cannon Lane (junction Whittington Way/Lyncroft Avenue)

General Location	Classification
	Pinner Green (opposite and east of Ash Hill Drive junction)
	Long Elmes (east of Headstone Lane junction)
Stanmore & Harrow Weald	Brockhurst Corner (Uxbridge Road/Kenton Lane junction)
	Stanmore Hill (south of Green Lane junction)
	Canons Corner (London Road junction)
	Kenton Lane/College Hill Road (junction)
Edgware & Burnt Oak	Whitchurch Lane (west of Canons Park Underground Station)
	Whitchurch Lane (opposite Mead Road)
	Buckingham Road/Chandos Crescent (junction)
	Mollison Way (between Cotman Gardens and Constable Gardens)
Kingsbury & Queensbury	Honeypot Lane (south of Everton Drive junction)
	Kenton Road (east and west of Charlton Road junction)
Kenton & Belmont	Honeypot Lane (south of Brick Lane junction)
	Kenton Lane (between Ivanhoe Drive and Hartford Avenue junctions)
	Kenton Road (east of Kenton Lane junction)

\*The core shopping area of Harrow-on-the-Hill is identified at Appendix 1 of the Harrow-on-the-Hill Conservation Areas Supplementary Planning Document (2008). The SPD makes sets out the conservation area considerations relevant to proposals for change of use and alterations within the identified core shopping area.

## Appendix 5: Deletion of current Local Plan documents

A.5.1 Should this draft Harrow Local Plan 2021-2041 be adopted, the following development plan documents forming part of the Harrow development plan will be deleted / superseded:

<b>Name of current document</b>	<b>Date of Adoption</b>	<b>Elements deleted / superseded</b>	<b>Replacement document</b>
Harrow Core Strategy	26 February 2012	Entire document / all policies	Harrow Local Plan 2021-2041 (if / when adopted)
Harrow Development Management Policies	4 July 2013	Entire document / all policies	
Harrow Site Allocations	4 July 2013	Entire document / all site allocations (any designations continue as shown on Policies Map)	
Harrow and Wealdstone Area Action Plan	4 July 2013	Entire document, including all policies and site allocations (any designations continue as shown on Policies Map)	
Policies Map	4 July 2013	As set out in the 'Atlas of Change'	Updated Policies Map to reflect Harrow Local Plan 2021-2041 (if / when the Plan is adopted).

A.5.2 The existing West London Waste Plan (adopted 2015) will continue to form part of the Harrow development plan until specifically replaced.

A.5.3 Existing Supplementary Planning Documents (SPD) will continue until cancelled or replaced.

A.5.4 The London Plan 2021 also forms part of the Harrow development plan but remains in place until replaced by a new London Plan (or if parts of the current London Plan are 'altered').