



**EXAMINATION OF THE HARROW LOCAL PLAN 2021-  
2041**

**HEARING STATEMENT**

**MATTER 6: SITE ALLOCATIONS INCLUDING THE  
HARROW AND WEALDSTONE OPPORTUNITY AREA  
STRATEGY**

**ISSUE 12**

**5 June 2025**

## **Matter 6: Site Allocations including the Harrow and Wealdstone Opportunity Area Strategy**

*Issue 12: Whether the proposed site allocations within the Plan are positively prepared, justified, effective and consistent with national policy and in general conformity with the London Plan*

### **Questions:**

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

#### **12.1 In what way does the policy wording recognise the interface between the opportunity area and the surrounding lower rise areas?**

- 12.1.1 Strategic Policy 5 (C) explicitly recognises that there are parts of the Opportunity Area which are not suitable for significant change. Part G(a) of the policy manages the interface between higher density development within the Opportunity Area and the surrounding residential area, ensuring this context is appreciated in new development. Paragraph 5.0.30 further contextualises the relationship between the HWOA and the surrounding suburban area.
- 12.1.2 This relationship has also been incorporated into the Council's Tall Buildings Study which will inform development heights.

#### **12.2 Is the policy sufficiently flexible in terms of focusing higher density development to other sustainable locations outside of the Harrow & Wealdstone Opportunity Area?**

- 12.2.1 The Local Plan, whilst directing growth into the Opportunity Area, does not preclude higher density development to other sustainable locations outside of the Opportunity Area.
- 12.2.2 Plan policies also recognise that new development is appropriate outside of the Opportunity Area. The Spatial Strategy sets out that *'the borough's other town centres will accommodate development opportunities commensurate to their character, role, and function'*. Policy SPO5 must be read in conjunction with other relevant policies such as SP01(d) & (e), GR1B, and LE1A which refer to supporting development across the borough (including areas outside of the Harrow & Wealdstone Opportunity Area). Further guidance can also be found in the Harrow Building Heights (Tall Buildings) SPD (2023) for guidance on the density of development outside of the Opportunity Area.
- 12.2.3 The Site allocations set out in Chapter 11 ensure that larger sites outside of the Opportunity Area should be delivered to make the optimal use of land in those areas. The approach to optimising small sites within 800m of public transport (London Plan policy H2) will also support higher density development in sustainable parts of the borough.

**12.3 Part A (b) of the policy refers to supporting the delivery of a minimum of 1,000 jobs within the opportunity area, as well as supporting employment floorspace to meet the evidenced needs of the Borough. Is the policy sufficiently precise regarding what these needs are? Is the policy clear as to how the delivery of 1,000 jobs identified will be addressed and should the policy be more precise in this regard? In what way does the policy as drafted accord with the Framework concerning strategic policies?**

12.3.1 SPO5 reflects the indicative 1,000 jobs target as set by the London Plan (2021) (Policy SD1 Opportunity Areas and Table 2.1). The evidenced floorspace needs for the borough are set out precisely at Paragraph 5.0.6 for 13,900m<sup>2</sup> of main town centre uses (predominantly food & beverage, leisure and entertainment uses), and 6,000m<sup>2</sup> of industrial floorspace. Policy support for the indicative 1,000 job target within the Harrow & Wealdstone Opportunity Area will assist in delivering the evidenced floorspace needs of the borough, with delivery predominantly achieved on allocated sites.

12.3.2 The Opportunity Area includes a broad type of sites, but generally two policy approaches are being proposed which pertain to the delivery of new jobs. Firstly, inefficient and dated existing floorspace is proposed for regeneration to provide modern, flexible floorspace. These will primarily meet the borough's need for main town centre uses by bringing forward mixed-use developments within the town centres within the Opportunity Area. This is delivered by the following policies:

- Identifying and setting objectives for character areas within the Opportunity Area (SP05(D-H));
- Ensuring comprehensive redevelopment, including through the use of Masterplans (SP05(B), (F));
- Delivery of sustainable transport improvements and other infrastructure to support densification (SP05(A)(e)&(f));
- Requiring mixed use development delivering a range of main town centre uses (at least) at ground floor level (SP04(B), SP05 (D, G & H);
- Through Site Allocations in Chapter 11.

12.3.3 Allocations within the Opportunity Area are expected to deliver 25,396m<sup>2</sup> of new main town centre uses, which based on a conservative average of one job/20sqm<sup>1</sup> of new floorspace would represent 1,268 new jobs within the Opportunity Area.

Site Allocation	Allocated Floorspace (m <sup>2</sup> )	New Jobs (20sqm per FTE)	Notes
OA1: Queen's House Carpark	2,119	106	

<sup>1</sup> Blended average based on HCH Employment Density Guide, 3<sup>rd</sup> Edition (2015)

Site Allocation	Allocated Floorspace (m <sup>2</sup> )	New Jobs (20sqm per FTE)	Notes
OA2: Harrow on the Hill Station	4,854	242	
OA3: 15-29 College Road	0	0	
OA4: Havelock Place	2,580	129	
OA5: Station Road East	3,185	159	
OA6: Greenhill Way	936	47	
OA7: Tesco Station Road	7,132	0	Reprovision of floorspace / jobs – not included in floorspace
OA8: Former Royal Mail Postal Office	250	12.5	
OA9: Poets Corner / Milton Road	2,000	100	Council services relocated into the Hub / Forward Drive, which is within the HWOA. Accordingly, there is no loss of jobs from within the HWOA.
OA10: Wealdstone Probation Office	182	9	
OA11: Carpark Ellen Webb Drive	683	34	
OA12: Peel Road	2,390	119.5	
OA13: Travis Perkins	3,905	195	
OA14: Byron Quarter	12,444	0	Reprovision of leisure floorspace / jobs
OA15: Iceland Wealdstone	485	24	
OA16: Kodak			Remaining employment floorspace to be delivered – NHS/school
OA17: Former Kodak Admin Building	1,827	91	Calculations taken from planning permission PL/1152/24
<b>Total</b>	<b>25,396</b>	<b>1,268</b>	

12.3.4 Intensification of the industrial land within the Opportunity Area is supported by Part A(c) of SP05, and Part C of SP04.

12.3.5 The Opportunity Area is identified in the London Plan 2021.

12.3.6 The Opportunity Area is set out as the principal location for new development in the Plan's spatial strategy.

- 12.3.7 The objectives for the Opportunity Area are set out in Strategic Policy 5. Within SP05, the overall strategy for the pattern (Parts D, G & H), scale (Part A, C), and design quality (B, C, D(f), G(a) & (c), H(a), (b) & (d).
- 12.3.8 The specific uses as set out in NPPF Para 20 (a-d) are set out in the Site Allocations in Chapter 11 of the Plan.
- 12.3.9 The Council consider that the policy accords with the Framework as it sets out a strategic policy to direct growth within the Harrow & Wealdstone Opportunity Area, as set out by the London Plan (2021). It provides a policy hook for site allocations within the Opportunity Area which will deliver uses that make a significant contribution to meeting local housing, employment, retail, and infrastructure needs. It covers the elements identified within paragraph 20 of the NPPF 2023, as they relate to the Opportunity Area i.e. housing numbers, infrastructure, heritage etc.
- 12.4 Parts D, G and H of the policy address the Harrow Metropolitan Town Centre, Station Road and Wealdstone District Centre respectively. A number of representors have raised concerns regarding the designation of the Station Road area within this policy. Are these concerns justified?**
- 12.4.1 The Council recognises that there are concerns from local residents who live in close proximity to proposed development sites, including those within the Station Road area, and actively engages with developers to ensure that local amenity is protected on all development sites. The policies in Chapter 2 of this Plan apply to all developments, including in the Opportunity Area, and seek to ensure that development benefits as many people as possible, and manages and mitigates any adverse impacts.
- 12.4.2 Each of the sub areas within the HWOA have distinct characteristics, as identified within the Policy SP05 and supporting text. Station Road plays an important role linking the existing Harrow and Wealdstone centres, and itself has a range of regeneration opportunities.
- 12.4.3 The policy acknowledges the Station Road corridor as being the lower density of the character areas within the Opportunity Area, with a more linear, low-rise development, smaller plot sizes and a very clear drop-off into a more suburban context (Paragraph 5.0.40-5.0.42). By reason of this character and relationship with the surrounding low rise suburban context, Part G(a) is included to ensure an appropriate relationship between the two-character areas.

12.4.4 The inclusion of Station Road as part of the Opportunity Area (as identified in the London Plan) is justified. The concerns are of representors are acknowledged and addressed though the inclusion of the policy criteria outlined above.

**12.5 Is the approach to the Harrow and Wealdstone Opportunity Area consistent with the London Plan? Concerns have been expressed regarding the capacity of the area to accommodate the growth expected through this Plan period, as well as the impact on the surrounding neighbouring areas. The London Plan identified that the HWOA will accommodate growth for at least 5000 homes and 1000 jobs. Paragraph 2.1.1 advises that when developing policies for development plans, boroughs should use the indicative capacity figures as a starting point, to be tested through the assessment process.**

12.5.1 The Draft Local Plan has been prepared consistently with regard to the London Plan, and the Mayor has advised that it is in general conformity. The London Plan target set out in Table 2.1 has been used as the target expressed in the Plan. The capacity of the Opportunity Area has been assessed on a site-by-site basis.

12.5.2 Site allocations have been identified within the Opportunity Area detailing how over 5,000 new homes and 1,000 new jobs will be delivered. These allocations have undergone design-led capacity testing to demonstrate how they will collectively deliver the indicative target. The approach to site allocations and capacity testing has been applied consistently across the borough. Where appropriate, space has been identified on allocations within the Opportunity Area to accommodate the new infrastructure required, as set out in the Infrastructure Delivery Plan (EBITO1). These capacities are set out in the relevant Site Allocations in Chapter 11.

**12.6 Where in the evidence base is the capacity assessment undertaken to support the figures set out within the policy. Is the policy justified?**

12.6.1 The policy is justified as the figures have been produced following design-led capacity studies for each of the draft site allocations. This is attached at Appendix 1 (as a separate document).

12.6.2 An assessment of infrastructure capacity and need has been undertaken by way of the Harrow Infrastructure Delivery Plan (EBITO1), with infrastructure providers identifying any potential issues in the context of level of growth envisaged.

**12.7 Is the area as defined within the Plan the same as the London Plan? If not, why not?**

12.7.1 The Harrow & Wealdstone Opportunity Areas as defined on the Policies Map is the same area as set out in the London Plan (2021).

**12.8 Could the Council set out (in a table from) the quantum of growth already accommodated within the area?**

12.8.1 LB Harrow monitoring for housing completions within the Opportunity Area since 2019 is set out below.

Year	Net Completions
2019/20	395
2020/21	516
2021/22	361
2022/23	504
2023/24	603
Total	2,379
Annual Average	476

12.8.2 According to the latest monitoring from GLA<sup>2</sup>, the number of jobs within the Opportunity Area is broadly flat since 2016. In 2023 the Opportunity Area accounted for 16% of the Council's 72,000 jobs.

**All site allocations:**

**12.9 The following questions relate to all of the site allocations as identified at chapter 11 of the plan. The Council should provide a full response for each allocation, and I suggest a table format is used to provide a response for each allocation referred to:**

Inspector's Question	Council's response
<b>Are the site allocations correctly drawn and are the boundaries justified?</b>	All of the site allocation boundaries are correct. They were all either submitted through the Call for Sites exercise or are existing site allocations from the 2013 Plan.
<b>What is the expected lead time in terms of the timescale for development and annual delivery rates and are these based on sound evidence?</b>	All site allocations are reflected in the housing trajectory. This is set out in detail in response to Matter 8 (the housing trajectory). Lead-in times have generally been assessed as commencing within a 2–3-year period from expected permission date. Completions are then spread out over a time period based on the size of the site. This is a bespoke trajectory for each site based on call for sites information and intelligence received from developers. A site-by-site table with a summary of

<sup>2</sup> [Opportunity Area Pen Portraits - 2025\\_Harrow\\_Wealdstone\\_OA\\_Pen\\_Portrait.pdf - data.gov.uk](#)

Inspector's Question	Council's response
	delivery estimates is included in response to Issue 8.
<b>In what way does the allocation identify the infrastructure requirements necessary, together with the timing for any necessary infrastructure?</b>	The allocations do not exhaustively set out the infrastructure improvements required in the local area. They do however identify opportunities for infrastructure to be delivered on site where appropriate and necessary. For a complete picture of the new infrastructure that will support new development, this is contained in the Infrastructure Delivery Plan (EBIT01). All site allocations have been assessed through the site selection process (EBHO1), which identifies where additional policy requirements are necessary to make the allocation sound. This includes for example, assessment of local flood risk, or where appropriate the need for a site to deliver a particular piece of infrastructure. These constraints, as well as opportunities identified for each site have been addressed within the individual site allocations.
<b>Is the quantum of floorspace/ units to be delivered correct and does this reflect what is presented within the housing trajectory? Should these figures be identified as minimum capacity figures?</b>	The Council agrees that all the allocated site capacities are minimums.
<b>In terms of the identified uses and policy considerations, are these based on sound evidence?</b>	All sites have been capacity tested to understand the potential of each to contribute to meeting local needs. The capacity assessment has included a consideration of constraints on and around the site to identify a baseline capacity for the site.

**12.10 Have all the concerns raised by Historic England and the Ministry of Defence been adequately addressed? The Council should set out a table confirming their response to each of the individual points raised.**

12.10.1 The Council has set out its response to each of the issues raised in the full Reg 22 statement. RAF safeguarding is already appropriately referenced in each Site



Allocation's Requirements, and the additional information while welcome is unnecessary to be included in Site Allocations.

12.10.2 Where appropriate, additional wording reflecting Historic England's response have been incorporated into the Site Allocations (see modifications LBH/ED9 and the London Borough of Harrow/ Historic England Statement of Common Ground (LBH/ED12)).

**12.11 Thames Water have provided detailed commentary in relation to a number of the site allocations proposed. In what way has the Council sought to engage with Thames Water in relation to the comments raised?**

12.11.1 There has been no direct engagement in relation to the commentary raised by Thames Water. Three of the four red RAG for network are active planning applications. The other (Harrow on the Hill Station) is close to other site allocations where no issues have been identified by TW, so taken to be a localised issue that will be addressed at the planning application stage.

**12.12 On the sites where Thames Water have identified that there are concerns regarding the capacity of the water network to accommodate the growth envisaged, are these concerns valid and should there be reflected within the policy wording as well as the IDP?**

12.12.1 Thames Water's response sets out that there either is, or can be, capacity to deliver water and sewerage connections into/from the site. Their concerns are around the potential time that it may take to model, and where necessary upgrade local connections, with this potentially taking 2-3 years. This is not considered to be an in-principle constraint on development, but it may have an impact on delivery rates.

12.12.2 This timeframe is not significant when considering large development proposals, with extended build out rates. The Council believes that this matter will be appropriately handled through the planning application process, noting that engagement during the preparation of the Local Plan means that Thames Water is aware of the proposed locations, their scale and likely development timeframes.

- 12.13 The Council have specified within CSD05 that site allocation capacities have been informed by design -led capacity studies. This is set out at EBH01 which identifies at paragraph 4.24 that where design led capacities have been used, a further 10% uplift has been applied. The justification for this is set out at appendix A. Given that the text recognises that the previous capacity approach was based on a density matrix approach, is the 10% uplift justified? Have the Council taken into account the representation made by CPR regarding tree planting and woodland creation in relation to sites HRW001 – HRW005? If not, why not?**
- 12.13.1 Document EBH01 sets out the difference in capacities delivered between the old London Plan density matrix approach and sites with planning permission. This difference was between 35%-220%.
- 12.13.2 The draft Local Plan uses a site design-led approach to identifying the capacity of sites, which we consider is much more likely to reflect the capacity of development when it gains planning consent; such an approach is consistent with the London Plan Policy D3 and associated guidance.
- 12.13.3 The analysis set out in Table A2 of EBH01 compares the average densities on existing allocations with consented densities and shows that the uplift is 24% across all site types and areas. As such a 10% uplift being applied to site design capacities is considered to be a sound approach.
- 12.13.4 With respect to the representation made by CPRE, Harrow is participating the GLA's Local Nature Recovery Strategy (LNRS) under the Environment Act. The strategy will agree priorities for nature's recovery, map the most valuable existing areas for nature, and map specific proposals for creating or improving habitat for nature and wider environmental goals.
- 12.13.5 As such the LPA considers this is the more appropriate mechanism to identify areas for biodiversity improvements such woodland planting as it is being prepared within a formal statutory and supported by an evidence base that is anticipated to be more robust than that outlined in the CPRE representation.

*The following questions are specific to each of the individual allocations as referenced below:*

**Site GB1**

**12.14 This is an existing hospital site within the Green Belt. As currently drafted, it is not clear to me how the allocation accurately reflects the guidance contained within the Framework concerning inappropriate development within the Green Belt. The Plan does not propose the release of the site from the Green Belt, and no exceptional circumstances have been put forward. Are these statements correct?**

12.14.1 Yes, and then no. The draft allocation is for the redevelopment of a hospital in the Green Belt. It is development affecting the Green Belt (Paras 152-156) rather than proposing the alteration of the green belt boundary (Paras 142-151). The test is therefore “very special circumstances”, not “exceptional circumstances”.

12.14.2 The site is an existing Hospital and an allocation under the current Local Plan, and it has also benefited previously from a permitted masterplan through a hybrid application – which whilst partly implemented, is now lapsed. The site allocation seeks to ensure the continuing operation of the hospital use, and its overall improvement as envisaged in the current allocation and previously consented masterplan. In order to achieve this, an enabling element of housing or uses supportive of the hospital use, to support the modernisation of the asset will be necessary, and this is reflected in the allocation (and continued over from the allocation within the current Local Plan).

12.14.3 Development on this site would primarily be the re-use of previously developed land. While the tenure of the housing is not yet known, the development would be considered in accordance with Paras 154(f) &(g) of the Framework 2023. Given the hospital’s strategic importance, we consider that the prospect of being able to justify Very Special Circumstances exists. This has been done for a recent application for a temporary surgical unit (P/4341/22).

**12.15 If they are correct, how is the allocation of the site for the uses identified (Hospital/Research and Innovation/Residential) justified and positively prepared?**

12.15.1 The hospital itself is a very significant and important orthopaedic / spinal injury facility, and further investment is required in order to continue to improve the offer. The planning history of the site (set out below) shows that there is a very strong likelihood that this facility will not be improved without an element of cross subsidy from a residential use. The NHS submitted a representation at the Regulation 18 Stage of the Local Plan process, stating that the ‘*Royal National Orthopaedic Trust and NHS North Central London ICB would like this allocation to be retained and reiterated within the new local plan*’.

12.15.2 We consider that there is a very substantial likelihood that an application can justify Very Special Circumstances for the enabling development to achieve this. The proposal would also have to have regard to Paras 153 in regard to minimising potential harm to the Green Belt.

**12.16 The relevant planning application summary is unclear – with reference to planning application P/3191/12 the text states that some parts of this scheme relating to the hospital have been implemented, but overall the permission has lapsed. What does the Council mean by this statement?**

12.16.1 The site has previously received a hybrid planning permission (P/3191/12). Broadly, this included:

- Outline permission for the phased redevelopment of the wider site, including the construction of new medical space, enabling residential development, and associated transport and landscaping;
- Detailed permission to improve access to the Aspire Leisure Centre facility;
- Temporary permission for car parking on the site.

12.16.2 The Aspire Leisure Centre facility was developed under a 2007 planning permission, which also included the parameters for other improvements to medical facilities across the wider site. Much of the anticipated improvements have not been brought forward due to funding constraints. This is set out in the planning statement for the latest permission (P/3191/12) as part of the justification for the enabling development, as well as justifying the very special circumstances for permitting development within the green belt.

12.16.3 The reserved matters for the wider regeneration of the facility, including the residential element, have not been permitted, and planning consent P/3191/12 lapsed in 2023.

**Sites OA2/OA5/OA6/OA9/OA11/OA12/OA14/OA15/O1/03/06/07/013/020/021/022/OA6**

**12.17 The policy in relation to the above sites specifies that any new development will have to bring forward an appropriate level of parking – but how has this been factored into the capacity work undertaken? is the policy sufficiently clear in this regard?**

12.17.1 The capacity work undertaken to date include London Plan parking assumptions within the development typologies used. As such where the allocation conforms to the London Plan parking standard, it is considered that the parking requirement has been included in the capacity assessment.

12.17.2 Following consideration of TfL's response to the draft plan, and as set out in the Statement of Common Ground between the parties (and suggested modifications

within), it has been agreed the vast majority of sites will be modified to accord with the London Plan's parking standards.

- 12.17.3 As such, sites OA2, OA5, OA11, OA15, O1, O3, O6, O7, O13 are all proposed to have London Plan compliant car parking levels, which have been included in the capacity assessment.
- 12.17.4 That leaves the following sites on which the Council is seeking a different parking level than the London Plan standard:
- 12.17.5 OA1, OA6 & OA12 – The Council is proposing that the policy acknowledges that any loss of existing town centre parking will need to have regard to the overall parking requirements of Harrow town centre (AO1&6) and Wealdstone town centre (OA12). This is as set out in Matter 9.
- 12.17.6 The Council has commissioned sensitivity analysis of the capacity assessment to understand the potential floorspace implication of reprovision of town centre car parking on the three Opportunity Area car park sites.

Site	OA1 - Queens House Car Park	OA6 – Greenhill Way Car Park	OA12 – Peel Rd Car Park
Existing Parking	390	264	300
<b>Residential units</b>			
Original capacity	129	354	207
50% reprovided	102	N/A	192
100% car parking spaces reprovided	79	320	167
<b>Commercial floorspace</b>			
Original capacity	2,119m <sup>2</sup>	936m <sup>2</sup>	2930m <sup>2</sup>
50% reprovided	1,078m <sup>2</sup>	N/A	1,323m <sup>2</sup>
100% car parking spaces reprovided	1,078m <sup>2</sup>	936m <sup>2</sup>	632m <sup>2</sup>

- 12.17.7 The Council has committed in its Statement of Common Ground with TfL to seek to manage down the overall quantum of town centre car parking. As such the car parking numbers and potential for floorspace losses of other uses set out above are considered to be maximums, and are unlikely to eventuate in full.
- 12.17.8 OA14 – The Council is seeking limited car parking within the site to serve the leisure use (after Modifications). There is no housing or commercial development on the site, and so no capacity assessment has been undertaken. Due to the specialist use, a site-specific travel plan will be undertaken at the planning application stage which will recommend actions to manage trips to and from the site.

12.17.9 For the two-tube station car parking sites (O20 & O22), replacement car park provision has been included within the capacity assessment at a 40% level. This assumption was based on the level of reprovision previously submitted on a previous application at Canons Park (Site O20 – P/0858/20), which was refused and dismissed at appeal. A higher replacement parking level (70%) was agreed in principle by the transport authority on site O22 (P/1221/20), albeit the planning application was withdrawn. The sites are challenging from a delivery perspective, with significant design and conservation constraints, as well as high expectations around delivery of affordable housing on publicly owned land. The Council looks forward to working through these challenges with the Mayor and Places for London/TfL.

12.17.10 O21 – The Council is seeking limited town centre car parking within the site. The site currently contains a significant amount of car parking linked to the town centre. The Council consider that an appropriate reprovision to serve the size of the centre should be provided through any redevelopment. This should be determined through planning applications.

## **12.18 How many car parking spaces will be lost as a result of the site allocation?**

12.18.1 The table below sets out the estimated current levels of parking spaces on each of the sites the Council is interested in retaining a level of parking on. The Council considered that, taking into account TfL and the Council's agreed objective to manage down overall parking levels, and the ongoing technological changes in transportation, it is appropriate to undertake assessment of parking impacts at application stage.

Site	Existing parking spaces
OA1 - Queens House Car Park	390
OA6 – Greenhill Way Car Park	264
OA12 – Peel Rd Car Park	144
OA14 – Byron Quarter	~375
OA0 – Canons Park Station Car Park	160
O21 – Amner Lodge	~290
O22 – Stanmore Station Car Park	446
Total	~2,000

**12.19 A number of the sites which the Council are identifying as site allocations are existing car parks, some of which are connected to public transport nodes. I also note that a number of station car parks are included and from an initial view as well as those expressed by the Regulation 19 representations, many appear to be well used facilities. I also note that Harrow has a significantly higher rate of car ownership (75.2%) compared to the London average (57.9%) reflecting the significantly higher rates of car use and distance travelled to get to work compared with the London average.**

**Please could the Council advise on the following:**

**Total number of car parking spaces to be lost through the plan period;**

- 12.19.1 Please see table above with respect to public transport / existing public car park sites.

**Have the Council completed any surveys of existing use and capacity of the existing car park(s)? Are the results of these surveys available?**

- 12.19.2 No surveys of the existing use and capacity of existing car parks have been undertaken. This will be undertaken as part of a local public parking strategy or when a planning application is received.

**Have the Council considered any implications of the removal of the car park for the allocated centre/transport node (where relevant)**

- 12.19.3 Yes, the Council has considered implications of the removal of existing car parking from sites proposed for allocation. The car parks are generally well used, and between Canons Park and Stanmore have a capacity of nearly 600 spaces. Public transport options to/from the sites are poor, and in all likelihood the users of the site do not live on them. The likely effect is that the users will stop making the trip to these two stations, and either drive further to a different station or into London to their trip destination, switch to a different mode, or stop making the trip altogether.

**Where no replacement car parking is proposed at Station Car Parks, for example allocation 07 Raynes Lane Station Car Park, what are the implications for this strategy in terms of existing parking at the site and the existing users of the car park?**

- 12.19.4 Rayners Lane has a significantly wider catchment, and better range of alternative travel options when compared to Canons Park and Stanmore Stations. As such it is more likely that the users of the car park would be able to switch to walking, cycling, or getting a bus to the station here than at the other locations.

**In what way will the Council ensure that policy M2 (H) is addressed as part of any development proposals, and should the site allocations (where applicable) include a cross reference to this policy for effectiveness?**

- 12.19.5 The Council notes that the car parks are well used and is aware that there is support locally for their retention as part of any redevelopment. The PTAL around the site is very mixed, as there is limited bus provision in the local area.

- 12.19.6 The Council is of the view that including car parking at the station will have positive accessibility impacts by allowing mixed road/rail trips for local residents. The alternative may be that instead of driving to the station, and continuing by tube, users choose to drive the whole length of their journey or not make the trip at all.
- 12.19.7 The Council, after consideration of TfL's representations, and as reflected in the joint Statement of Common Ground is proposing that the Rayners Lane site has only London Plan levels of car parking. The difference between Rayners Lane, which has a wider range of public transport alternatives and is located within a town centre, and Stanmore and Canons Park, which are at the end of the line / GLA boundary. As such the Council feel that there is a material difference in the types of trips that car parking at the station will influence.
- 12.19.8 The car parking levels currently on the site have been reprovided at 40% of the existing spaces in the capacity assessment for the two Jubilee line station sites. It will be most appropriate that determining a "sufficient" level of car parking to be secured through the site's redevelopment is identified at the planning application stage.
- 12.19.9 It may be appropriate that M2(H) is cross referenced in these policies.

**12.20 There also appears to be a variance of approach in terms of referencing replacement car parking on some but not all of the sites. What evidence has been used to inform the approach taken? Where allocations refer to replacement of sufficient car parking is it clear what this would mean in practice?**

- 12.20.1 The Council has sought to make these references more consistent and targeted in response to TfL's representations on the draft plan, as set out in the Statement of Common Ground. Proposed modifications have also rationalised the extent of car parking reprovion sought. The Council has only maintained the car parking review clause for limited Metropolitan Town and District Centre sites, the new leisure centre, and selected station car park sites.

#### **OA4 Havelock Place**

**12.21 Some of the site allocations refer to a number of delivery timeframes, however the above site refers to the whole plan period. What does the policy mean by this?**

- 12.21.1 Please see the table under Issue 8 Appendix A.

#### **OA8 Former Royal Mail Postal Delivery Office, Elmgrove Road**

**12.22 Given the fact that planning permission has been refused previously for residential development on this site, is the site developable? The allocation refers to industrial co location – is this description specific enough?**



- 12.22.1 The previous planning application was refused for a number of reasons, including the height / scale of development and because it resulted in the loss of industrial floorspace on the site.
- 12.22.2 The site is a non-designated industrial site. Capacity testing for the site allocation has been undertaken which included both industrial floorspace along with residential development. Co-location as a concept is set out within Policy E7 of the London Plan (2021) and therefore the Council consider that the description is specific to ensure that there is appropriate re-provision of industrial floorspace.
- 12.22.3 Capacity testing also provides more appropriate heights for its context which assists in overcome other reason for refusal.

#### **OA11 Car Park Ellen Webb Drive**

- 12.23 Given the site's location and proximity to the railway line, is it realistic to assume that appropriate residential amenity can be provided for the future occupiers of the development? What evidence does the Council have to support this position?**
  - 12.23.1 Development of brownfield sites abounding rail lines is very common in London, including in close proximity to stations. Development already abounds rail lines for much of the rail route between Harrow & Wealdstone station and Euston, including notable sites at Wembley Central and the Alexandra & Ainsworth Estate in Camden. Matters of amenity can be addressed through acoustic fencing, triple glazed windows and mechanical ventilation. This demonstrates that it is realistic to assume that appropriate residential amenity can be provided on the site should it come forward for residential purposes.
- 12.24 Are the identified land uses justified?**
  - 12.24.1 Yes, site is suitable for either residential or hotel use as the primary use and therefore justified. There is an evidenced need for hotel use within the Borough (Harrow Economic Needs Study (2024) (EBLEO1), and the site, being within the Harrow & Wealdstone Opportunity Area and a town centre location, is a suitable location for this use.
  - 12.24.2 Supporting uses are set out as 'appropriate town centre uses' to reflect the location of the site within a designated town centre.

#### **O14 Vernon Lodge**

- 12.25 Does the allocation of this site need to justify the loss of the existing use under policy HO10? Is the site developable?**
  - 12.25.1 New (replacement) hostel accommodation is planned as part of Allocation OA10 – Harrow Probation Office. The Council is content that the site is developable (being vacant / available) and is engaging in pre-applications with an interested developer.

**12.26 Are the identified building heights appropriate and are they supported by the evidence base?**

12.26.1 The Policy / site allocations does not identify appropriate building heights. The Council expects all developments to be design-led, having regard to the tall buildings study (EBDH03), as set out in the development principles. The indicative capacity within the site allocation takes into the site's context and appropriate heights within this.

**OA13 Travis Perkins Wealdstone**

**12.27 What is the justification for the reference to use of a Compulsory Purchase Order in relation to this site?**

12.27.1 This reference has been removed in the proposed modifications (LBH/ED09).

**12.28 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?**

12.28.1 A relatively small area within the allocation is at risk from flooding. The Council has responded positively to the EA's consultation requirement to clarify where development should avoid areas of flood risk within the site. The capacity assessment has taken the area of flood risk into account in calculating the capacity of the site and reference made to the SFRA Level 2 (EBBC07) in the Development principles.

**017 Kenton Road Telephone Exchange**

**12.29 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?**

12.29.1 A relatively small area within the allocation is at risk from flooding. The Council has responded positively to the EA's consultation requirement to clarify where development should avoid areas of flood risk within the site. The capacity assessment has taken the area of flood risk into account in calculating the capacity of the site and reference made to the SFRA Level 2 (EBBC07) in the Development principles.

**OA16 Kodak**

**12.30 If the site is under redevelopment, should it form an allocation – does the site contribute to the existing pipeline of sites?**

12.30.1 The Kodak site is a strategic major site within the borough, and the Council continues to receive further planning applications on the site. Accordingly, to ensure the site objectives continue to be delivered, it is appropriate that there remains a site allocation on the site to ensure co-ordinated future delivery.

- 12.30.2 The site makes a significant contribution to the existing pipeline of sites.
- 12.31 Is the amount of housing identified to be delivered justified by the evidence base and does this figure reflect what is contained within the trajectory?**
- 12.31.1 The entire site has received planning permission and is being progressed by two separate developers. Ongoing pre-apps / applications being received to revise the design of later phases to reflect new requirements (i.e. fire safety / dual staircases) and the evolution of the character of the scheme (i.e. more recent approvals being at greater density than those granted outline permission in 2015).
- 12.31.2 The number of residential units included in the housing trajectory is informed by the extant planning permissions.
- 12.32 Is the requirement for NHS floorspace to be provided on the site justified by the evidence base?**
- 12.32.1 The Harrow Infrastructure Delivery Plan (EBIT01) identifies that there are potential gaps in healthcare provision locally, especially in the central area of the Borough (including within the Opportunity Area), when growth is taken into account. As such the NHS floorspace requirement set out in the site allocation is appropriately justified by evidence and is the outcome of discussions with the NHS with respect to specific site allocations. This use has been permitted within existing planning permissions for the site but has not yet been implemented as it is in a later phase. Including as part of the allocation ensures greater certainty that this use will be delivered.
- 12.33 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?**
- 12.33.1 A relatively small area within the allocation is at risk from flooding. The Council has responded positively to the EA's consultation requirement to clarify where development should avoid areas of flood risk within the site. The capacity assessment has taken the area of flood risk into account in calculating the capacity of the site.

#### **OA17 Former Kodak Administration offices**

- 12.34 Is the SIL designation correct in relation to this site allocation justified?**
- 12.34.1 The existing SIL designation was subject to discussions with the GLA in preparing the Statement of Common Ground with the GLA, which proposes to remove this site from SIL, and redesignate it as LSIS. This will mean that the allocation of a mix of industrial and residential is in line with the London Plan and other policies in the Local Plan and better reflects the changed context of the current SIL designation.

- 12.34.2 The London Mayor's Regulation 19 response provided specific commentary in relation to OA17 and the industrial designation. The GLA suggested that the designation is downgraded to either Local Strategic Industrial Site (LSIS) or remove the designation entirely. The Council consider the retention of LSIS is justified as it assists in providing a level of protection for the industrial type floorspace on the site, which will assist in ensuring a sufficient amount of floorspace and premises within the borough to help meet the identified local need for employment floorspace.

### **O18 Wolstenholme**

#### **12.35 What is the status and use of the current site? Is the site developable?**

- 12.35.1 The site has previously been permitted for the allocated use, and the Council is confident that it will come forward over the Plan period.

### **O19 Marsh Lane Gas Holders**

#### **12.36 In light of the representations received, is this site allocation justified and effective? Is it developable?**

- 12.36.1 The site is not in a town centre location, and as such it is inappropriate that the supermarket use being promoted by the landowner should be allocated. There is not a robust case that there is unmet local convenience retail need, and indeed the out of centre use would draw spend away from local centres. The Plan already makes provision for new retail space within the local centre (Stanmore) at Policy O21-Amner Lodge.
- 12.36.2 With on-site remediation being undertaken, the design-led capacity work indicates that residential development could be delivered on site. The site is more appropriate for this use than for retail from an access perspective.
- 12.36.3 It is understood that National Grid have a "sell clean" policy, which will mean that they remove all of their equipment and clean the land so that it is suitable for commercial/industrial use. So this site would be no more onerous for a residential developer than a commercial or industrial site, many of which have come forward for development in Harrow and across London.

#### **12.37 Will it be developable for the uses envisaged and have all the known site constraints, including the easement zones been taken into account?**

- 12.37.1 Design-led capacity work indicates that the allocated quantum of residential floorspace can be delivered on site taking into account the known easements on the site.

**O9 Pinner Telephone Exchange**

**12.38 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?**

- 12.38.1 A relatively small area within the allocation is at risk from flooding. The Council has responded positively to the EA's consultation requirement to clarify where development should avoid areas of flood risk within the site. The capacity assessment has taken the area of flood risk into account in calculating the capacity of the site and reference made to the SFRA Level 2 (EBBC07) in the Development principles.

**O16 Travellers Rest, Kenton Road**

**12.39 Representations from the landowner would suggest that this site allocation is not reflective of the current use of the site, and the site is not available for the uses envisaged by the site allocation. Is the policy as currently drafted effective?**

- 12.39.1 The LPA considers that the site is currently in use as a hotel and a public house; this is a position that has been maintained through pre-application and application processes.
- 12.39.2 In response to the consultation the need to replace the hotel use on the site has been removed, allowing it to be reprovided elsewhere within the borough to address the overall need for the plan period (as per Policy LE5: Tourism and Visitor Accommodation). It is considered appropriate that public houses are replaced, particularly in areas where there are limited alternatives. This is supported by Para 98 of the Framework and HC7 of the London Plan.

**12.40 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?**

- 12.40.1 A relatively small area within the allocation is at risk from flooding. The Council has responded positively to the EA's consultation requirement to clarify where development should avoid areas of flood risk within the site. The capacity assessment has taken the area of flood risk into account in calculating the capacity of the site.

**Appendix 1 – Allocated Sites Capacity Report**

See separate document.