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# Harrow Local Plan Examination Hearing Statement

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134 Kenton Road, HA3 8AT



# Examination Hearing Statement

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## 1. Introduction

- 1.1.1. This Hearing Statement has been prepared on behalf of Whitbread PLC in response to specific Matters in the Inspector's Matters, Issues and Questions ('MIQ') (reference. LBH/ED6) Stage 1 Hearing Sessions scheduled for June - July 2025 in respect of the Examination of Harrow Local Plan Review.
- 1.1.2. As set out within the Inspector's Guidance Note (reference. LBH/ED5) this Statement is limited to the issues and questions raised by the MIQs. This written statement follows representation previously submitted by Savills on behalf of Whitbread PLC to the Regulation 19 Draft Local Plan Consultation between 4<sup>th</sup> November to 17<sup>th</sup> December 2024.
- 1.1.3. The Council has suggested a series of changes to the Plan as documented in LBH/ED3A. However, these were identified as additional modifications (changes which do not materially affect the policies in the Plan). The Council have been asked to revisit this, and the publication is pending. The basis of the examination is the submitted plan (Regulation 19) and does not include these suggested changes. Recommendations from this point to the submitted plan will only be considered where it is to ensure it is sound and/or meets the relevant legal requirements.

### 1.2. Background

- 1.2.1. A planning application (reference. PL/0378/S2) was submitted to LB Harrow in February 2025 and is currently pending determination for the "*Demolition of building and structures to provide 4 to 7 storey buildings with basement, comprising residential dwellings (Class C3) and Co-Living Accommodation (Sui Generis) with Drinking Establishment (Sui Generis) on the ground floor, and landscaping, public realm improvements, car and cycle parking, servicing arrangements, plant and associated works.*"
- 1.2.2. On behalf of Whitbread a number of representations have been submitted to the Council through the local plan process, most notably the Regulation 18 representation called for the site to be allocated for a mix of Build to Rent ['BTR'] (Class C3) and Co-living (Sui Generis) accommodation, alongside an associated Class E/ Sui Generis (Drinking establishment) use to replace the existing restaurant/bar on site. Together this would replace the existing hotel. This follows a series of pre-application meetings with the London Borough of Harrow during the course of the application preparation process where the principle of this redevelopment has been supported. The planning application is in the later stages of consideration by the Greater London Authority ('GLA') and LB Harrow who are both highly supportive of the development proposals and the application is due to be determined in August/September 2025.
- 1.2.3. The next section of this Statement we set out our representations to the relevant policy matters we have previously made representations to and in this context, we specifically respond to the Matters, Issues and Questions raised by the Inspectorate.

## 2. Matter 6 – Affordable Housing and other housing matters

### Issue 9

*Issue 9 states: Whether the approach to affordable housing is justified, positively prepared, consistent with national policy and in general conformity with the London Plan*

**Policy H09: Large Scale Purpose built and conversions for shared living.**

#### **2.1. Q10.5 Is part A (c) of the policy flexible enough or should it also include Harrow's designated town centres and areas with a high PTAL rating?**

2.1.1. Subsection (c) of draft policy requires LSPBSL developments to be located only within the boundaries of Harrow Metropolitan centre and Wealdstone District Centres which forms part of the Opportunity Area. This is considered to be contradictory to London Plan Policy H16 which otherwise agrees that such developments would work well and could be supported in any location that is well-connected with good access to local amenities. The London Plan's Large-scale Purpose-built Shared Living LPG goes further, noting that areas that are likely to be more suitable for co-living developments include "all areas of PTAL 5 or 6 and Inner London PTAL 4" and "other town centres with a high or medium growth potential". It is therefore considered unjustified to restrict co-living developments only to Harrow Metropolitan centre and Wealdstone District Centres. For this reason, the policy should include Harrow's designate Town Centres and areas with a high PTAL rating.

2.1.2. By restricting LSPBSL to limited areas (the OA) within the Borough, this could significantly undermine the delivery of much needed housing/ affordable housing to meet housing needs and could create an overconcentration of this specific use within one area to the detriment of achieving more mixed communities and neighbourhoods.

#### **2.2. Q10.6 Is the policy as currently drafted justified by the evidence base? In particular, where is the evidence to support the approach adopted within parts (b) and (d) of the policy?**

2.2.1. It is considered that the policy is not justified by the evidence base. The evidence base (Harrow Local Housing Need Assessment Update – February 2024) suggests a fundamental misunderstanding of the target demographics for co-living. It is identified within the Evidence Base that co-living is a product for student populations. This is not accurate as co-living does not seek to target the student population alone.

2.2.2. Indeed, it does not target any specific demographic and is open to all. However, typically it is more suited to and desirable for persons aged 25-34 by way of the greater likelihood for this demographic to comprise single-person households who favour accommodation that focusses on community and social interaction. This within itself is an alternative form of affordable housing which meets a need beyond student accommodation.

2.2.3. In this respect, the parameters of "need" referenced in this draft policy fails to acknowledge the demand component of co-living accommodation. Prior to the introduction of co-living, this demographic would typically occupy private rental accommodation or house-shares (whereby such premises comprise of a larger family-sized home). However, the nature of co-living in providing a more social and community-led residential

product means it would meet a specific demand which cannot otherwise be met by conventional housing. By its nature it therefore responds to a wider and more diverse local need for housing.

- 2.2.4. Subsection (b) of draft policy requires applicants to demonstrate the affordability of the proposed shared-living accommodation with alternative products within the Harrow private rental sector. By its very nature, shared-living accommodation which prioritises social interactions and curated communal amenity spaces, has no comparable alternative that would allow for objective rent comparisons. The rents occupants would pay in shared-living accommodation would typically cover bills, services and full use of these facilities – whereas a single room in a house-share would be commensurately cheaper as a result of respective rents covering an occupant's room only. The affordability of LSPBSL is therefore not necessarily directly comparable. Whilst a market-led comparison of shared-living rents versus private rents can be presented in an application (as part of subsection (a) for example), using this as a benchmark to assess the latter's "affordability" in its own right would be imbalanced. It is therefore suggested subsection (b) is removed. This would of course exclude providing affordability information in relation to the provision of affordable housing within such schemes.
- 2.2.5. Subsection (d) requires that no two LSPBSL schemes should be within a 250m walking distance of one another, unless robust evidence is provided. This provides a direct contradiction within Policy HO9, whereby subsection (c) requires this form of development be contained within OA's. On this basis, the policy, on the one hand would encourage LSPBSL in this location and at the same time would restrict it. As a consequence, it is likely that this policy would unreasonably and detrimentally restrict the delivery of LSPBSL as whole within the Borough and the delivery of housing units to meet housing demand within LB Harrow and London as a whole. This policy is therefore unsound and would contradict the NPPF and would not be in keeping with the London (Policy H16 & H4).

## 2.3. Q10.7 Does the policy overall present a sufficiently flexible approach?

- 2.3.1. Policy H09 on co-living is considered overly rigid as it requires detailed affordability comparisons that are not meaningful due to the unique nature of co-living. It restricts co-living to only two specific centres, despite the London Plan guidance clearly supporting such development in well-connected sustainable locations. The mandate to require future adaptability to C3 use will prove technically and economically challenging, potentially affecting the ability for this type of development to come forward where needed most.

## 2.4. Q10.8 Do parts of the policy (e and i) repeat other policies contained within the Plan?

- 2.4.1. It is considered that parts of the policy are overly prescriptive and duplicates requirement across other policies. **Subsection (e)** relates to **design quality, amenity and sustainability**, which are already covered under general design and housing policies elsewhere in the Plan (e.g., policies on housing standards, amenity, or sustainable development).
- 2.4.2. **Subsection (i)** pertain to **management or operational aspects** of co-living schemes, which are addressed in broader policies. In this respect, it is considered that the over-prescription of this policy creates unnecessary complexity which is not required.
- 2.4.3. It is therefore considered that parts (e) and (i) be removed or cross-referenced to existing policies rather than repeated.

## 3. Matter 6 – Site Allocation 016

### Issues 12

*Issue 12 states: 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.*

#### 016 Travellers Rest, Kenton Road

**3.1. Q12.39 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?**

- 3.1.1. Site Allocation O16 seeks to allocate land at 134 Kenton Rd for hotel, public house and residential development. This is contrary to Whitbread's proposals for the development of the site which is subject to a pending planning application.
- 3.1.2. Whitbread's rationale for redeveloping the existing hotel on the Site is as a result of their strategic growth strategy, which seeks the replacement of this dated facility with a new, larger flagship hotel in Harrow Town Centre (noted by Policy LE5 in the Draft Local Plan as the sequentially preferable location for new hotel developments in the borough). In this respect, Whitbread achieved planning permission in February 2024 for the Garden House scheme (Ref: P/3066/20), which comprised a new hotel of 140 bedspaces (20 more than on the Site) and began bringing forward redevelopment proposals for the Site for residential development.
- 3.1.3. In this context, the Site Allocation O16 is contrary to Whitbread's plans for the development of the Site and needs to be fully amended to reflect current circumstances.
- 3.1.4. Fundamentally, **Whitbread Plc therefore strongly object to proposed Allocation O16 on the basis that the allocation has not be properly assessed or justified.** We therefore request the following amendments to Allocation O16 as provided below.

Site information	
Address:	Travellers Rest, Kenton Road, Kenton
Area:	0.69ha
Description	The Site contains a collection of two-three storey buildings that are currently in operation as <del>public house</del> a restaurant and bar (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. 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. 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).
Current use	- Hotel - <del>Public House</del> Restaurant and Bar
Ownership	Private



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PTAL	5—6a 4 to 5
Site source	Call for Sites
Relevant planning applications	PL/0378/S2
<b>Site Allocation</b>	
Site objective	<p><del>A mixed-use development that re-provides a ground floor Food and Beverage provision (Class E / Sui Generis) Public House, alongside a residential-led development (comprising a mix of C3 dwellings and co-living accommodation) and Hotel within the Kenton District Town Centre, with an enabling residential element.</del></p> <p>A mixed-use development which provides residential dwellings (Class C3) and Co-Living (Sui Generis) with flexible Restaurant (Class E b) / Drinking Establishment (Sui Generis) use or Doctors Surgery (Class E e) or flexible Class E use on the ground floor in Kenton District Centre.</p>
Allocated use	<p><b>Leading land use</b></p> <p><del>Hotel</del></p> <p><del>Public house</del></p> <p>Restaurant / Drinking Establishment or Doctors Surgery</p> <p>Flexible Class E use</p> <p>Residential (including Co-living)</p> <p><b>Supporting land use(s)</b></p> <p>Town centre uses</p>
Development timeframe	1 – 5 years
Indicative residential capacity	109 C3 dwelling houses / units and 103 co-living units (Sui Generis)
<b>Planning Considerations</b>	
Flood Zone	<p>Critical drainage area</p> <p>Flood zone (Surface Water) 3a - Part of site</p>
Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	<p>Town Centre Boundaries (Kenton)</p> <p>RAF Northolt Safeguarding Zone</p>
<b>Development Considerations</b>	
Requirements	<p><del>Re-provision of hotel use on site</del></p> <p>Re-provision of Restaurant / Drinking Establishment <del>public house</del> on site or else delivery of a new Doctors Surgery or flexible Class E use.</p> <p>Retention of trees protected by Tree Preservation Orders (TPOs).</p>
Development principles	<p>The site is located within the Kenton District Town Centre and currently is in use as a Travellers Rest Beefeater <del>Restaurant Public House</del> 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 <del>residential-led</del> mixed use scheme to be delivered on site.</p> <p>Any new development must, at ground floor level, seek to reprovide <del>the</del> a restaurant and bar <del>public house and hotel</del> or else a new Doctors Surgery or flexible Class E use on the site, to provide an active frontage and town centre uses within the District Centre. <del>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.</del></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 for replacement buildings would therefore need to have regard to this context heritage in their design and materiality in accordance with the National Planning Policy Framework, the London Plan and heritage policies within this Local Plan-</p> <p><del>There is a need across both London as a whole and Harrow for tourism infrastructure, specifically with regard to hotels / serviced apartments. The site is in a highly sustainable location and has excellent public transport links to Wembley and Central London.</del></p> <p>Given the size of the site, <del>an</del> a substantial element of residential development, for which there is a defined need, is able to be delivered on site in conjunction with the above requirements, and <del>may is-be</del> capable of providing more height than which exists in the surrounding area. Whilst the size of the site could 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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## 3.2. Justification for Proposed Amendments

- 3.2.1. The Site Allocation as written fails to accurately describe the existing condition and uses across the site; and in detailing proposed uses, fails to apply relevant evidence bases and flexibilities that will allow the site to come forward in a way that can best address local need. The details and implications of this are set out below.

## 3.3. Consideration of Current Uses

- 3.3.1. The draft Allocation references an existing Public House on Site. The current use is not a Public House and so this reference should be removed from the Allocation.
- 3.3.2. The existing Site contains a Premier Inn Hotel and associated Beefeater Restaurant. Within the Beefeater Restaurant itself is a bar area. The draft Site Allocation however identifies the Beefeater as a "Public House" which is incorrect.



- 3.3.3. The existing Beefeater building operates as a chain restaurant in association with the adjacent hotel, providing the food and beverage functions for the hotel whilst also being open to members of the public. The ground floor of the venue is extensive (more than 1,100sqm in size) and is primarily used for and allocated to restaurant uses. Tables and booths are provided with cutlery and menus which is typical of such use. Conversely, a much smaller area of the floorplan (circa 16%) is considered to be seating for the bar (and customers can order food to these tables). In this respect, it should be acknowledged that the Beefeater restaurant secures a larger proportion of its floor space and turnover from food sales from the restaurant rather than from the bar.
- 3.3.4. The operation of a Beefeater Restaurant ancillary to a Premier Inn Hotel is fairly typical of how Whitbread operates such facilities. Recent examples of this typology include Rackspace City, North Hyde Road located in LB Hillingdon (Planning Application Ref: 22632/APP/2016/2369) and Land Adjacent to Catholic Club, 81-88 Beresford Street, Woolwich in Royal Borough of Greenwich (Planning Application Ref: 10/3288/F), both of which comprised new Premier Inn Hotels with a Beefeater Restaurant that was considered to be an ancillary use to the hotel.
- 3.3.5. Whilst there is nothing in the adopted Local Plan nor in the London Plan which assists in defining a Public House, London Plan Policy HC7 does stipulate that typical Public Houses which warrant protection are those which have a “heritage, cultural, economic or social value”. The broad range of characteristics for consideration by London Plan Policy HC7 is below – with an assessment against the existing Beefeater Restaurant in Italics:
- Is in a Conservation Area;
    - *Beefeater Restaurant is not located in a Conservation Area*
  - Is a locally- or statutorily-listed building;
    - *Beefeater Restaurant is neither locally nor statutorily listed. The draft Allocation allows for the demolition of the existing building, so heritage value is considered low on balance.*
  - Has a licence for entertainment, events, film, performances, music or sport;
    - *Under the Licensing Act 2003, the Beefeater Restaurant is licensed for the showing of films, indoor sporting events, live music, recorded music and performance of dance. However, it is understood that the premises are rarely used for such events.*
  - Operates or is closely associated with a sports club or team;
    - *The Beefeater Restaurant does not associate with a sports team or club.*
  - Has rooms or areas for hire;
    - *Having been subject to various alterations since its original construction, the Beefeater Restaurant is extensive in size and irregular in layout. There is a space on the western portion of the floorplan that is partitioned off from the main restaurant area that is used for overflow seating. During quiet periods however it is occasionally used for meetings and events.*
  - Is making a positive contribution to the night-time economy;
    - *Beefeater Restaurant is located in a predominantly residential area. Whilst it is licensed, there is limited demand for hosting live and recorded music events, films and regular performance of dance.*

*Whilst licensing allows activities until 12.30am, the venue closes at 11pm Monday-Saturday and 10.30pm on Sunday. The venue's contribution to the night-time economy is therefore limited.*

- Is making a positive contribution to the local community;
  - *The Beefeater Restaurant is frequented by locals who wish to eat and drink – in the same such way they would attend any similar restaurant within the Kenton District Centre. The specific contribution this venue makes to the area could therefore be replicated through the provision of a replacement restaurant with bar.*
- Is catering for one or more specific group or community.
  - *Beefeater Restaurant is open to the public and does not target any specific demographic or community group.*

3.3.6. Given the above, the Beefeater Restaurant is not considered to warrant protection under London Plan Policy HC7 both for the reasons outlined above and also on the basis that it is not a Public House. The draft Allocation as written is therefore inaccurate and should be amended to refer to the existing use as a Hotel and Beefeater restaurant and bar.

## 3.4. Consideration of Proposed Uses

3.4.1. The draft Allocation seeks the reprovision of (i) a hotel, (ii) reprovision of the public house and (iii) an indicative residential provision of C3 dwellings. Each of these uses and the associated issues that arise are detailed below.

### (i) Hotel Reprovision

3.4.2. The required retention or reprovision of the existing hotel use appears to stem from Policy LE5 in the Draft Local Plan which sets requirements for the protection of existing hotels.

3.4.3. LBH's Town Centres Economic Needs Study 2024 suggests a projected need for an additional 15 hotel rooms per year in the Borough from 2023.

3.4.4. The Site is currently operated by Whitbread. However, as part of a wider Whitbread strategy of improving their hotel stock, they recently secured planning permission for a new hotel in Harrow Town Centre in the form of the Garden House scheme (Ref: P/3066/20). Modern in construction, better located (in both policy terms and operationally) and larger (20 more rooms) than the hotel existing on Site, this is envisaged to be the flagship Premier Inn offering in LB Harrow.

3.4.5. Upon its opening, Whitbread will cease operation of the Premier Inn on the existing Site and decant hotel operations into the new building. This new hotel will therefore provide a replacement hotel within the Borough and will counter-balance the loss of hotel rooms within the existing hotel, with a net increase of 20 bedspaces. This is in full accordance with London Plan Policy E10 which seeks to maintain visitor infrastructure whilst also contributing towards LB Harrow's hotel need. The requirement to retain the existing hotel on the Site is therefore not justified in terms of hotel need as the loss of the hotel would not have an adverse impact on the strategic delivery of hotel bed numbers in the Borough.

3.4.6. The retention of the hotel use is commercial flawed and unviable. Whitbread will not continue to operate this Site which is not a commercially sustainable hotel. The building is dated; the maintenance costs are unduly

high and the costs of providing a new hotel on the site would not be economically viable. Whitbread consider that the Site does not benefit from a more central location which provides greater accessibility, services and facilities and therefore it is commercially disadvantaged. This has been compounded by new hotels opening in Harrow Town Centre and other central areas, hence Whitbread's decision to close this Site and to re-provide a new hotel in Harrow Town Centre. Draft Allocation O16 refers to the fact that the residential element would facilitate enabling development for the other land uses, which in itself is recognition by LBH of the unviable nature of the development.

- 3.4.7. Whitbread's approach to provide new hotel development in Harrow Town Centre is fully in accordance with the Town Centre first approach to locate large town centre uses within Town Centres, as a sequentially preferable location. The Site Allocation which seeks to encourage new hotel development on the Site, is contrary to this approach and therefore defies Local, Strategic and National Planning Policy.
- 3.4.8. The progression and adoption of this Local Plan allocation would be harmful to Whitbread's business operations and Strategy, which is predicated on the operation of an improved hotel offer in Harrow Town Centre with the opening of the Garden House Hotel development and the closure of the Site at 134 Kenton RD, which has become surplus to requirements. It is not commercially feasibility to operate both hotels within Harrow. The NPPF stresses the importance of supporting businesses and economic growth. This would have the opposite effect and would be detrimental to Whitbread and the local economy.
- 3.4.9. The implication of this is LB Harrow being left with an aging, vacant hotel building that fails to contribute towards the local economy, does not facilitate the delivery of additional hotel rooms and misses a valuable opportunity to optimise the use of this well-located brownfield site for much needed housing.
- 3.4.10. For this reason, Whitbread objects to Allocation O16 which is not viable or deliverable; is contrary to other policies in the Local Plan and NPPF and would fail to deliver the strategic objectives of the Local Plan. The draft Allocation should be amended as set out above accordingly.

#### (ii) Public House Reprovision

- 3.4.11. As set out above, the Beefeater Restaurant is not a Public House and as such there is no requirement for this specific use to be retained.
- 3.4.12. Notwithstanding this position, it is recognised that a replacement restaurant / bar (Class E b/Sui Generis) or a Doctors Surgery (Class E e) would provide a beneficial town centre use to complement other uses within the Kenton District Centre. The provision of an active frontage and natural surveillance would similarly improve the current public realm along Kenton Road.

#### (iii) Doctor's Surgery

- 3.4.13. Kenton Bridge Medical Centre is located at 155-175 Kenton Road, Harrow, HA3 0YX. It is currently overcapacity and actively looking to expand its provisions. As part of the public consultation process for the emerging redevelopment of 134 Kenton Road, Whitbread has been approached by the Medical Centre with a view to discussing scope for any new scheme to accommodate a new expanded doctor's surgery (which would sit alongside and in additional to the Medical Centre at 155-175).
- 3.4.14. The practice has struggled to find suitable accommodation and the proposed unit within the new development at 134 Kenton Road would meet their requirements and locational criteria.

- 3.4.15. The Site Allocation could therefore allow for the potential for a doctor's surgery, to respond to healthcare needs of the local community.

(iv) Residential Provision

- 3.4.16. The London Plan requires LB Harrow to deliver 8,020 new dwellings between 2019-2029. Whilst the majority of these are to come forward within the Harrow and Wealdstone Opportunity Area, there is nonetheless a strategic direction to deliver sufficient housing across the borough to meet a wide range of housing needs.
- 3.4.17. As noted above, the draft Allocation's stipulation that the existing hotel be retained would not only prejudice LB Harrow's strategic goal of delivering more hotel rooms, but it would also impede the delivery of much needed houses.
- 3.4.18. As written, the draft Allocation allows for 109 C3 dwellings as primarily enabling development to allow for the retention of the existing hotel and Public House. However, as demonstrated through the planning application, which is currently pending, the genuine residential capacity of the Site in the event the hotel use is removed is substantially higher. The present emerging design allows for 103 co-living rooms with associated amenity space (Sui Generis) and 109 Build-to-Rent dwellings (Class C3).
- 3.4.19. Given all of these considerations, the currently drafted site allocation 016 is not viable and not deliverable and is therefore contrary to the guidance in the NPPF in bringing forward available and deliverable sites. On this basis the Site Allocation is completely unsound and should be amended in accordance with our modifications.
- 3.5. Q12.40 Has the Council had regard to the representations made by the Environment Agency in drafting the policy wording and are the concerns raised valid?**
- 3.5.1. From the submission documents it appears the Council has regarded the representation to the EA in amending the wording under the allocation to 'surface water flooding' from Flood Zone (Surface Water) 3a. No further comments are provided on this matter.

## 4. Matter 8 – Employment, Retail and Town Centre Matters

### Issue 14

*Issue 14 states: is the approach to the provision for the employment and retail needs of the borough are justified, positively prepared and in general conformity with the London Plan.*

### Policy LE5: Tourism and Visitor Accommodation

#### 4.1. **Q14.20 In what way does part A of the policy accord with the Framework and in particular the reference to highly sustainable locations?**

- 4.1.1. We support Part A of the policy which directs Hotel development towards Harrow Town Centre and supports a town centre first approach.

#### 4.2. **Q14.21 Is part C of the policy as currently drafted effective? How will parts a and b of the policy be assessed? Is the working at part c effective? Should the policy wording permit the replacement of alternative tourism and visitor accommodation within the borough?**

- 4.2.1. It is considered that Part C of Policy LE5 as drafted is not effective or reasonable. The policy does not currently allow for the loss of an existing hotel to be made acceptable by a replacement hotel within the Borough. In order to resolve this position, a new clause should be added (subsection d) to Part C allowing the loss of hotel **floorspace where it is reprovided elsewhere in the borough**. This approach would be in keeping with London Plan Policy E10 which looks to ensure a sufficient supply of hotel bedspaces are delivered and maintained within London. It also allows for scenarios whereby hotel operators may seek to implement their strategic plans to close and open new hotels within the same local authority area as part of an active strategy. This approach would be in line with the NPPF (paragraph 85) which seeks to support the changing needs of businesses and support economic growth.

#### 4.3. **Q14.22 What is the justification for part E of the policy and why is this requirement necessary in relation to tourism and visitor accommodation, but not other uses identified within the Plan? Is this policy requirement consistent with the London Plan?**

- 4.3.1. Part (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” appears to lack evidence or support for this specific requirement in relation to tourist accommodation. This requirement has not been applied to any other form of development such as residential, retail or office development and therefore appears inconsistent in approach and lack fairness. The London Plan (policy D3 and Policy SI7) supports the principles of sustainable design and circular economy, however, does not single out Tourism accommodation for conversion-readiness.

## 5. Conclusion

- 5.1.1. In summary, the representations submitted in relation to Site Allocation O16, Policy H09 and Policy LE5 of the Harrow draft Local Plan raise significant concerns regarding the soundness, flexibility, and consistency of the draft policies.
- 5.1.2. Site Allocation O16 is not considered effective or deliverable, as it misrepresents current site use and conflicts with the landowner's strategic redevelopment plans, which are subject to a pending planning application.
- 5.1.3. Policies LE5 and H09, although aligned in part with national policy, contains provisions—particularly Parts C and E—that are unjustified, inconsistently applied, and not fully aligned with the London Plan. To ensure the Local Plan is positively prepared, justified, effective, and consistent with national and regional policy, the representations recommend amendments to improve clarity, flexibility, and deliverability in accordance with the NPPF.



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