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6th June 2025

**London Borough of Harrow New Local Plan Examination Hearing Statement
Representations on behalf of Tesco Stores Limited**

Dear Louise,

London Borough of Harrow is in the process of producing a new Local Plan which will guide development in the Borough between 2021-2041. The emerging Local Plan was submitted to the Secretary of State for independent examination on 26th February 2025, with the examination opening on Tuesday 24 June 2025.

We are writing on behalf of Tesco Stores Limited ('Tesco') who own the following site ('the site'):

Tesco Superstore, Station Road, Harrow, HA1 2TU

We have previously submitted representations to both the April 2014 Regulation 18 consultation and the December 2024 Regulation 19 consultation. A separate submission was also made to the April 2024 call for sites consultation running concurrently with the Regulation 18 consultation which informed site allocation OA7: Tesco Station Road.

This examination hearing statement sets out further Tesco's position on the proposed Local Plan wording.

Site Background

The site is positioned at a key crossroads on Station Road, mid-way between Harrow on the Hill and Harrow and Wealdstone and within the Harrow and Wealdstone Opportunity Area. It measures at 2.19 hectares and is currently occupied by a single storey Tesco Superstore which was opened in 1992. Although performing well, the store is now over 25 years old and no longer reflects modern retailing standards and customer expectation. The existing site layout with the store located towards the back of the site relative to the retail frontage on Station Road gives the impression of a car-dominated retail development. Redevelopment to reprovide a modern store with residential above would contribute to the objectives of the opportunity area and allow for significant improvements to Station Road. The existing site plan is included below.

The Site is allocated within the 2013 Harrow and Wealdstone Area Action Plan as Site 11. The allocation

proposed limited redevelopment for the retention and extension of the Tesco store along with new retail units and 14 new homes on the corner of Station Road and Hindes Road. This allocation was based on an unimplemented 2012 planning permission and represents a significant underutilisation of the site.

The site is the subject of a major planning application (ref. PL/0693/24) which was validated on 11th April 2024 and will provide a new and improved Tesco store alongside 504 new homes, subsequently revised to 480 homes to reflect an increase in family sized units. This is expected to be determined at committee in September 2025.

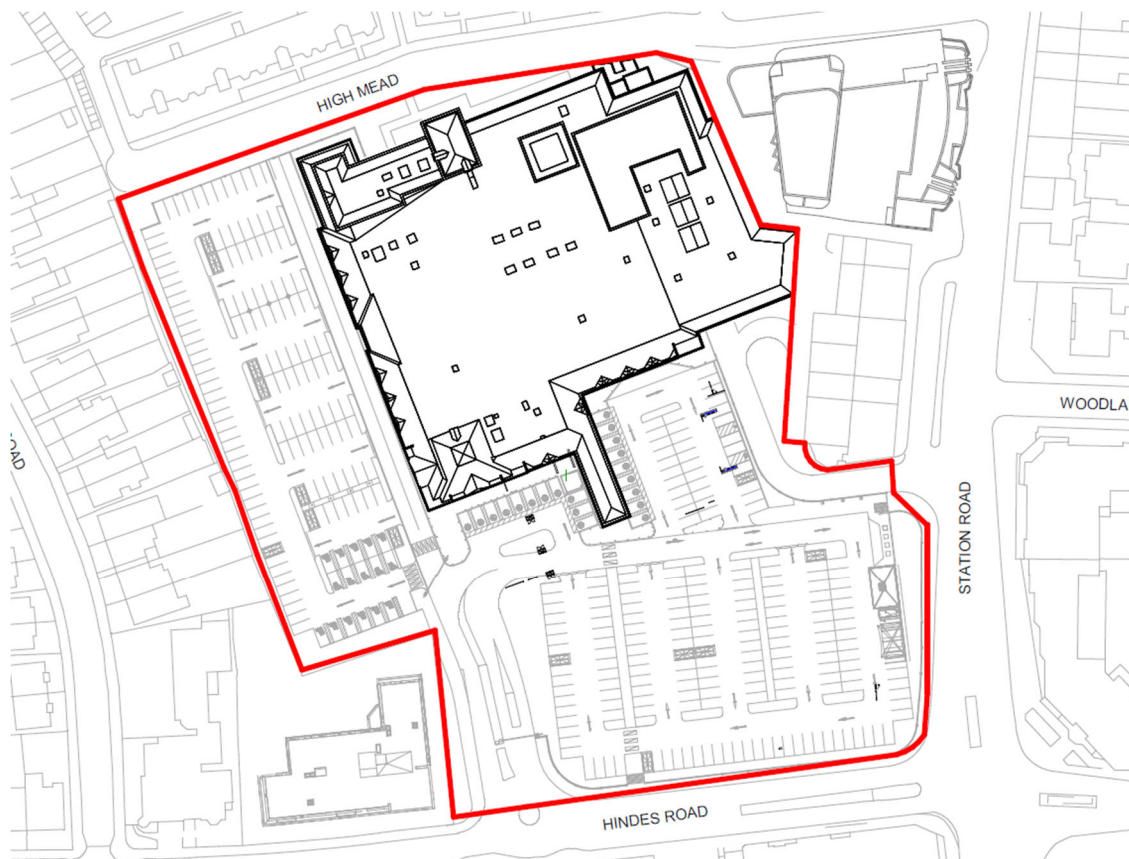


Figure 1: Existing Site Plan

Representations

Tesco support the preparation of a new Local Plan, which sets out a clear approach for the delivery of housing, economic objectives and environmental sustainability for the Borough. The strategic approach to direct much of future development to the most sustainable and central locations such as the Harrow and Wealdstone Opportunity Area and town centres will help revitalise and regenerate these areas whilst protecting the suburban character within the rest of the Borough.

These representations provide comments on the following policies:

1. Site Allocation OA7: Tesco Station Road
2. Policy M2: Parking
3. Policy GR4: Building Heights
4. Strategic Policy 05: Harrow and Wealdstone Opportunity Area
5. Policy CN1: Sustainable Design and Retrofit
6. Policy HO1: Dwelling Size Mix

Site Allocation OA7: Tesco Station Road

The list of allocated sites includes the Station Road Tesco under new allocation OA7, with an indicative capacity of 463/509 homes and a new supermarket. Tesco support the inclusion of this new site allocation but has the following comments.

The Government has been clear in its objective to deliver 1.5 million new homes over the next 5 years as part of its Plan for Change. National, strategic and local levels of planning policy are all clear in their support for the redevelopment of brownfield sites such as Greenmead Place. This was echoed by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government in her first Ministerial Statement on 30th July 2024 which stated:

“The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes...”

This strong support for the redevelopment of brownfield sites was enshrined in the December 2024 revisions to the NPPF. Paragraph 125c states planning policies and decisions should:

*“...give **substantial weight** to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”*

The Mayor of London confirmed in a speech in January 2024 that house building is slowing in London as the cost of construction rises. The supporting report shows that the cost of construction materials, such as steel, timber and concrete for all types of work rose by 21% in 2023. This increase is roughly equal to the rise that was seen across the previous 12 years in total.

This slowdown in housing delivery is further evident on a national scale, with recent data published by the then Department for Levelling Up, Housing and Communities (DLUHC – March 2024) (now the Ministry of Housing, Communities and Local Government) (SOC51) stating that, between 1 October and 31 December 2023 (Q4), the number of dwellings in England where building work has started on site was 19,080 which equates to a 51% decrease when compared to the same quarter of the previous year (2022). In this period, the number of dwellings

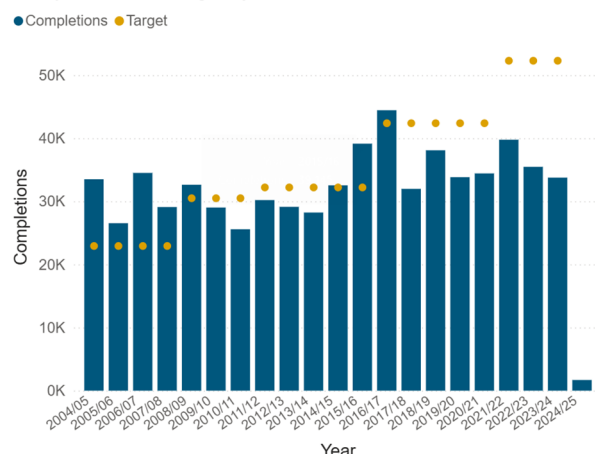
completed was 39,650 which is a decrease of 15% when compared with the same quarter of the previous year (2022).

The DLUHC report data shows that housing starts and completions both reached their lowest level in the first quarter of 2020 reflecting the restrictions introduced during the COVID-19 pandemic. Following a sharp uptick in the September Quarter 2020, starts have been more unstable, peaking in the June Quarter 2023 and then falling sharply again in the second half of 2023. Completions decreased in the March Quarter of 2023 and have been stable since. On a regional scale, the data demonstrates that housing completions decreased in all regions from the previous year, however the largest percentage decrease was in London, where completions decreased by 22% from the previous year.

The recent decrease in housing delivery can be explained by the catalogue of unprecedented global events and market factors occurring during this period. A combination of interest rate rises, significant cost inflation, changing building regulations and recent difficulties in securing a Registered Provider for the affordable housing component of developments have all had a stagnating effect on housing delivery.

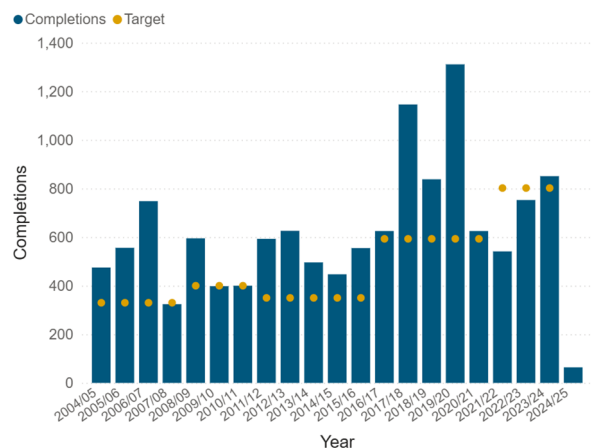
As outlined within paragraph 4.1.2 of the London Plan it should be recognised that London is a single housing market area, with a series of complex and interlinked sub-markets. As such it is not appropriate to focus on housing delivery within Harrow in isolation but rather London as a whole. The Planning London Datahub demonstrates that while the London Plan 2021 sets an annual target of 52,287 residential completions across London, this figure has not been achieved at any point since the target was introduced in 2021. It is not since 2016/17 that the annual housing target was met with 43,313 new homes delivered of the then lower 42,388 annual target (equivalent of 102% of the target). The new standard method as outlined in the revised NPPF will result in a substantial increase in Harrow's housing targets from 802 new homes per annum to 2,294 new homes, reflecting the substantial need for housing in the borough.

Completions and Target by Year



Completions vs target in London (left) and Harrow (right)

Completions and Target by Year



In response to this the GLA published its Accelerating Housing Delivery Practice Note in December 2024 which outlines strategies to expedite housing development in London, with a focus on increasing affordable housing. It emphasizes the importance of the Fast Track Route, encouraging developers to meet specific affordable housing thresholds to streamline the planning process, which the Greenmead Place scheme is complying with. The note advocates for enhanced delivery of social rented homes to address significant housing needs.

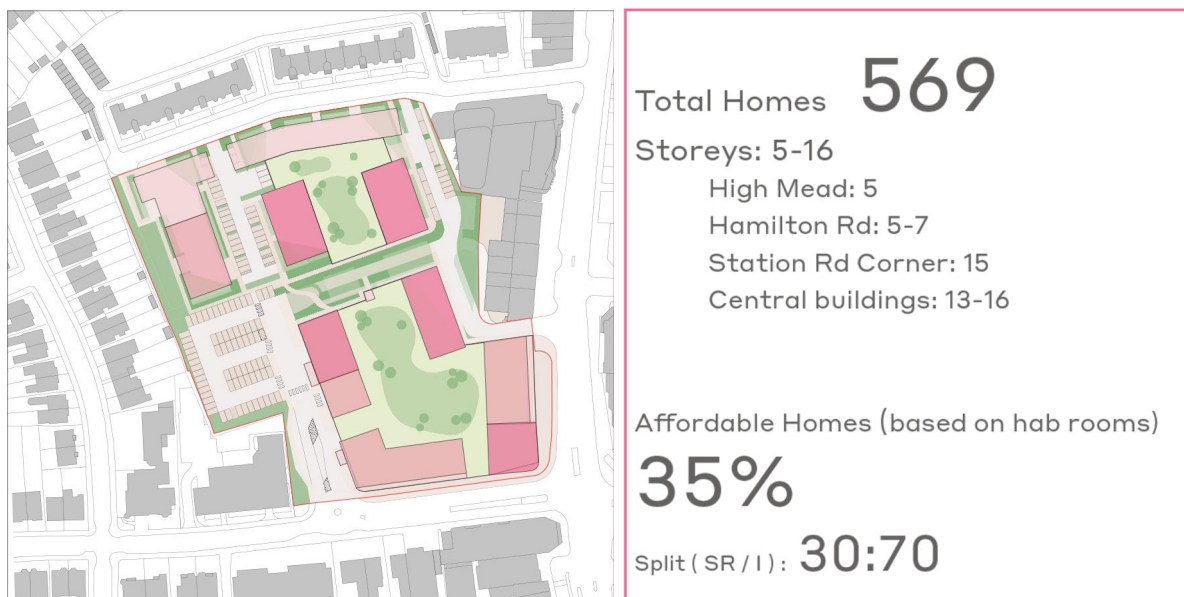
The Application Site is a substantial under-utilised brownfield site located within the Harrow and Wealdstone Opportunity Area, in a highly accessible location within the designated Harrow Metropolitan Town Centre

boundary. Apart from the single-storey Tesco store which is located towards the rear of the site relative to Station Road, the site is dominated by extensive areas of surface level car parking and hardstanding. This prime brownfield site is significantly underdeveloped making poor use of scarce land resources in a Metropolitan Town Centre and Opportunity Area. The Application Scheme will deliver 480 new homes, representing 59% of Harrow's annual housing delivery target set by the London Plan and 17% of the overall minimum capacity of 2,800 homes set by the AAP.

On this basis, a higher indicative site capacity should be allocated to the Station Road Tesco site (OA7). The site meets national and strategic planning priorities by making optimal use of a large, underutilised brownfield plot within a highly accessible Metropolitan Town Centre and Opportunity Area. Increasing the indicative capacity would better reflect the site's potential to contribute meaningfully to Harrow's significantly increased housing targets, support London-wide housing delivery shortfalls, and align with fast-track delivery mechanisms encouraged by the GLA.

It is unclear what the updated minimum capacity requirement of 463 has been based on. We suggest that an absolute minimum of 480 homes can be provided since this is what the current planning scheme is proposing.

We also consider there to be significant potential for an uplift in the site's maximum capacity. Draft Policy GR4 indicates that development of up to 15 storeys could be appropriate on the site. Earlier iterations of the planning application discussed during pre-application meetings with LB Harrow and presented at public consultation in July 2022 proposed a scheme of 5 to 16 storeys, delivering 569 homes. Although this was later reduced in height at the request of officers, it clearly demonstrates the potential for additional capacity within the 15-storey threshold identified in the 2024 Tall Building Study, which forms part of the evidence base.



In order to reflect the reduction in the central buildings from 13-16 to 13-15 storeys we request that the indicative residential capacity listed in the site allocation is amended to read:

'550 C3 dwelling houses / units'

Document LBH/ED9 Schedule of Proposed Modifications includes the following proposed amendment:

'Re-provide the existing supermarket with limited car parking in line with London Plan standards to avoid a site that is dominated by surface car parking and sufficient associated parking.'

We object to this proposed amendment. The current planning application already proposes a parking strategy where 242 customer spaces are proposed, representing a 34% cut from the existing provision. This parking provision is essential for the viability of the Station Road Tesco as well as the Harrow on the Hill and Harrow and Wealdstone Centres by providing continuity of linked trips that also support the wider viability of the town centre.

Policy T6.3 of the London Plan (2021) states new retail developments within Outer London Opportunity Areas can be provided with a maximum of 1 car parking space per 75sqm (GIA). On this basis the proposed 6,039sqm (GIA) store could only provide 81 customer car parking spaces under this policy. However, part G2 of Policy T6.3 states:

'Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in...a significant reduction in the viability of mixed-use redevelopment proposals in town centre.'

Tesco have confirmed that the level of parking proposed (242 customer spaces) is viable from a commercial perspective. There is also significant local support for maintaining car parking in order to support the viability of the wider town centre.

We therefore request that draft site allocation OA7 is amended to revert back to the original wording to reflect this proposed reduction in parking in line with London Plan Policy T6.3(G2) since 81 spaces would not be commercially viable and would negatively impact the viability of the wider town centre. This would also align with draft Policy M2.

Policy M2: Parking

Draft Policy M2 proposes parking standards in alignment with the London Plan. Part H of the draft policy states:

H. Any proposed reduction of car parking (either on-street or off-street) should have regard to the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.

Tesco support the inclusion of draft Policy M2.H. Retaining and improving sufficient car parking provision where it already exists is essential for the viability of the Station Road Tesco as well as the Harrow on the Hill and Harrow and Wealdstone Centres by providing continuity of linked trips that also support the wider viability of the town centre.

Policy GR4: Building Heights

Draft Policy GR4 states that:

- A. *Tall buildings to be 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 maximum appropriate heights as set out within the designated tall buildings zones shown within the Policies Maps.*

Document LBH/ED9 Schedule of Proposed Modifications includes the following proposed amendment:

~~'Maximum appropriate~~ Appropriate heights for tall buildings'

We support this proposed amendment in wording. It is of note that Appeal Decision APP/A5270/W/24/3347877 (Waitrose, Ealing W13 0NL) appeal was allowed for a mixed-use redevelopment including new homes and a replacement supermarket at the Waitrose site in West Ealing. The Inspector's assessment of building height was central to the case. The design forms a cluster of tall buildings around West Ealing Station, which the Inspector saw as appropriate due to its status as a transport hub and a logical focal point for intensification. The emerging Local Plan suggests a maximum of 13 storeys for the site (allocation 15EA) but this was based on the 2023 Tall Buildings Strategy (TBS), which has already been undermined by permissions for taller schemes nearby (e.g., 16 storeys at 42 Hastings Road). The Inspector concluded that the proposed height (which exceeds 13 storeys) reflects evolving site context and is more likely to survive plan examination than the capped heights proposed in the TBS. The Inspector found the proposed building heights justified due to, policy support for intensification, established tall buildings nearby, compliance with design and impact criteria and the failure of existing planning documents to reflect recent context changes. On this basis the removal of phrase 'maximum' is supported since this allows greater flexibility to propose a building height appropriate to the context, assuming all other material considerations are appropriately balanced.

The designated Tall Building Zones Map on p.57 of the Draft Local Plan indicates that the site is suitable for development of up to 15 storeys. We understand that this threshold has been informed by a Tall Building Study (2024) which forms part of the Local Plan evidence base. This report has undertaken a suitability and sensitivity analysis across the Harrow & Wealdstone Opportunity Area, which has identified tall buildings zones, along with maximum appropriate building heights within them.

This report confirms that the Tesco site offers an opportunity to make better use of land. At the centre of the site, there is opportunity for a maximum building height of 15 storeys, whilst the edges should be sensitive to the low-rise Station Road Parade and surrounding low-rise houses.

Tesco supports the proposed wording of Policy GR4 and the proposed 15-storey threshold identified for the site on the following basis:

- A. The site does not sit within any of the protected viewing corridors identified by the London View Management Framework Supplementary Planning Guidance.
- B. 15 storeys on the site would be in line with the urban character of the Borough area and would respond to the existing townscape context within the Opportunity Area.
- C. Development of up to 15 storeys on the site would reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. At present there is a 'gap' in street frontage owing to the surface car park servicing the superstore, proving an opportunity to create a new retail urban frontage and a continuation of the commercial uses along the key artery connecting the two town

centres of Harrow & Wealdstone and Harrow-on-the-Hill.

- D. Tesco support the approach of focusing taller development towards the centre of the site, but there is an opportunity for a taller element on the corner of Station Road and Hindes Road to mark the junction. Planning application PL/0693/24 proposes a 12 storey building in this location and this is considered to be in-keeping with the street scene on the corner.
- E. The Safari Cinema site sits directly adjacent to the north-east corner of the application site. Planning permission ref. p/3043/19 was approved by LB Harrow in January 2020 for a cinema and 78 residential units, including an 11 storey element. This permission has been implemented and is currently under construction. The officers report for the approval acknowledged at paragraph 6.3.1 that *'It is inevitable that the character of the area will significantly change as a result of the high density of development proposed. However, the increase in density in this location is vital to support the wider regeneration of the Heart of Harrow Opportunity Area and its surrounding area through sustained economic growth and job creation'*.

Strategic Policy 05: Harrow and Wealdstone Opportunity Area

Draft Strategic Policy 05 splits the Harrow & Wealdstone Opportunity Area into three distinct areas, including Station Road. Part G of the draft policy sets out the requirements for 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.*

Tesco support the inclusion of Strategic Policy 05.G and planning application PL/0693/24 includes proposals that fully address the requirements of parts a-c of the policy. As part of the Harrow and Wealdstone Opportunity Area, Station Road is a highly accessible and sustainable location with significant potential to accommodate high quality development which optimises density in accordance with London Plan Policy D3 whilst also repairing the street scene, enhancing the public realm and improving connectivity between Harrow and Wealdstone town centres.

Policy CN1: Sustainable Design and Retrofit

Draft Policy CN1.e (Offsetting) states:

'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'.

Measures are intended to incentivise the delivery of sustainable buildings in London, however the two options for the carbon offset fund based on Energy Use Intensity (EUI) and solar PV maximisation deviate from Part L of the Building Regulations and Strategic Policy including London Plan Policy SI 2 which sets the carbon offset price as £95 per tonne. For a policy to be considered sound it must be robustly tested and justified, taking into account the reasonable alternatives, and based on proportionate evidence as well as being consistent with national policy (NPPF para. 35).

Policy HO1: Dwelling Size Mix

Emerging Policy HO1.A.1 states that:

'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'.

Tesco recognize the importance of delivering a good mix of unit sizes, including family sized dwellings, however consider the current wording of the draft policy to be overly restrictive.

London Plan Policy H10.A recognizes that a higher proportion of one and two bed units is generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity and the need for additional family housing and the role of one and two bed units in freeing up existing family housing. Part B of Policy H10 states that Borough should provide guidance on the size of units required (by number of bedrooms) for low-cost rent homes.

Applying a 25% requirement across all tenures will affect the viability and deliverability of schemes and we request that the policy is adjusted to apply to affordable tenures only, which allowing greater flexibility for private elements to meet market demand. Additionally, whereas this policy may be appropriate for smaller sites in suburban areas, large redevelopment schemes in the opportunity area proposing higher density mixed-use development are unlikely to be able to fully comply with this policy while remaining viable.

Conclusions

Tesco welcome the opportunity to comment on the emerging local plan and consider the proposed height thresholds set out in draft Policy GR4 to represent a positive approach to make better use of an under-utilised site in a sustainable location, as well as provide opportunities to repair the 'gap' in the Station Road street frontage. Draft Strategic Policy 05 aligns with the objectives of the Harrow and Wealdstone Opportunity Area and planning application PL/0693/24 includes proposals that fully address the requirements of parts a-c of the policy. Draft Policy M2.H also contributes to the ongoing viability of the opportunity area and local centres.

Tesco welcome the opportunity to comment on the emerging Local Plan, please contact mikeb@rolfe-judd.co.uk if you have any questions or would like to arrange a meeting.

Yours faithfully

Mike Bottomley

For and on behalf of
Rolfe Judd Planning Limited