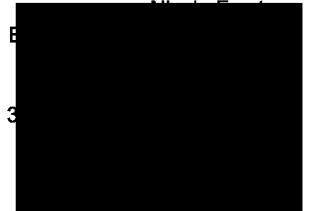


New Local Plan,
Planning Policy Team,
London Borough of Harrow,
Forward Drive
Harrow
HA3 8FL



Dear Sir/Madam,

REPRESENTATION ON THE PROPOSED MAIN MODIFICATIONS TO THE EMERGING HARROW LOCAL PLAN

We are instructed on behalf of our client, Whitbread Plc, to submit representations to the London Borough of Harrow ('LBH') on the proposed Main Modifications to the emerging Harrow Local Plan ('Draft Local Plan'). Specifically, the representations relate to their land ownership at 134 Kenton Rd and its future development.

As a key stakeholder and landowner within the Borough, Whitbread is keen to ensure that the New Local Plan is supportive of their business operations and strategy which seeks to provide significant investment in hotel development, to contribute to economic growth within Greater London and on a National basis.

Whilst we note that Main Modifications do propose a number of changes to the Draft Local Plan which are supported, fundamentally, these are not considered to go far enough. As such Whitbread Plc continues to strongly object to the Main Modifications on several grounds as follows:

- (i) Failure to properly assess Site Allocation O16;
- (ii) Allocation O16 is not viable and deliverable;
- (iii) Allocation O16 is inconsistent with the planning application proposals which undermines due planning process and engagement;
- (iv) Allocation O16 would directly prejudice the ability of the Local Plan to meet its housing need and demand, contrary to the requirements of the NPPF;
- (v) A number of other policies as drafted are unduly onerous, conflict with the adopted strategic policy position or else fail the test of "soundness" noted in Paragraph 36 of the NPPF

This letter is structured to firstly set out previous engagement held with LBH on behalf of Whitbread (which includes previous representations on the Regulation 18 and 19 Local Plan and Call for Sites and our submission of a subsequent Hearing Statement to inform the Draft Local Plan Examination); and is followed by our representation on the Main Modifications which, in Part A, provides comments on Draft Local Plan Allocation O16: Travellers Rest, Kenton Road and, in Part B, provides comments on other planning policies.

Previous LBH Engagement

On behalf of Whitbread and pursuant to the first "Call for Sites Consultation", an initial Call for Sites representation was submitted to LBH on the 1st November 2023. This was in relation to the Beefeater and Premier Inn, Kenton Road, HA3 8AT ('the Site'). It was expressed through this representation that this Site, located on the junction of Kenton Road and Carlton Avenue measuring 1.75 acres (0.71 Hectares) in size would be appropriate and available to come forward for development to replace the existing hotel with approximately 200 residential units.

A further representation and a concurrent Call for Sites submission (again, for the Site) was submitted to LBH on 25th April 2004 pursuant to the Regulation 18 Local Plan consultation ('Regulation 18 Representations'). This submission sought 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, these uses would replace the existing hotel.

A final representation was submitted to LBH on 16th December 2024 pursuant to the Regulation 19 Local Plan consultation ("Regulation 19 Representation"). In this regard, whilst the Regulation 19 Local Plan allocated the Site for development, it incorrectly assessed the existing land uses and sought for an allocation of retained and new uses that were neither viable nor deliverable. This was considered contrary to the wider policies in the emerging Local Plan, whilst also directly prejudicing the ability of the Plan to meet its wider housing and hotel targets. Alongside the above, a number of other draft Regulation 19 Local Plan policies were also found to conflict with the adopted strategic policy position or else failed the test of "soundness" required by Paragraph 36 of the NPPF. This commentary was also therefore included as part of our Regulation 19 Representation.

On behalf of Whitbread PLC, Savills subsequently provided a Hearing Statement in response to the Stage 1 Local Plan Hearing Sessions which took place June – July 2025. The Matters included in this Statement were "Affordable Housing and Other Housing Matters"; Site Allocation O16; and Employment, Retail and Town Centre Matters. Savills attended the respective Hearings on the 9th, 10th and 11th of July where the key concerning matters were discussed with the Examination Inspector.

Concurrent with the ongoing representations through the Local Plan process, Savills was engaged in extensive pre-application discussions with LBH in relation to the site coming forwards for residential-led redevelopment. This process commenced with the current design team in April 2024 and involved 5 pre-application meetings with Council officers underpinned by a Planning Performance Agreement. The resulting Full Planning Application (Ref: PL/0378/25) was submitted to LBH in February 2025 and, following a comprehensive consultation process and a positive GLA Stage 1 Report, appeared before LBH's Planning Committee on 25th September 2025 with an Officer's Report recommending approval. The application was however refused on design grounds.

Given its strategic importance and wider compliance with the London Plan, the GLA formally called the application in on 1st December 2025 taking it over as the decision maker. The final public hearing for the application has not been confirmed but it will likely take place in Q1 2026. Accordingly, Ref: PL/0378/25 is still considered a live and pending application which should be fully considered in any emerging allocations for the site.

Main Modifications Representations

This section details our representations pursuant to the Main Modifications on the Draft Local Plan in relation to the proposed Site Allocation and emerging policies, to ensure that (i) they support Whitbread's future aspirations as a key landowner in the Borough and (ii) they pass the test of soundness as required by Paragraph 36 of the NPPF 2024. In this respect, the NPPF considers a Local Plan to be sound if it is:

- "a) Positively prepared: [As a minimum, a Local Plan should seek] to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified: [A Local Plan should deliver] an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective: [A Local Plan should be] deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) Consistent with national policy: [A Local Plan should enable] the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."

In such respects, Paragraph 39 requires Local Planning Authorities to work "proactively" with Applicants to secure developments that will improve the economic, social and environmental conditions of an area. For the reasons set out below, both the Site Allocation O16 and a number of other draft Local Plan policies as amended by the Main Modifications fail to meet all of these tests and therefore the Plan in relation to these matters is unsound.

With the above in mind, we set out below firstly our comments on Draft Local Plan Allocation O16: Travellers Rest, Kenton Road (Part A) and then comment on other planning policies (Part B).

PART A

Site Allocation Ref: O16: Travellers Rest, Kenton

Site Allocation O16 as amended by the Main Modifications seeks to allocate land at 134 Kenton Road for a Residential, Public House / Restaurant / Bar uses and **a new requirement to provide 1,619 sqm of non-residential space**. Whilst it is noted and welcomed that reference to a retained and replacement hotel has been removed from the allocation, **Whitbread Plc continues to strongly object to the proposed Allocation O16 as worded on the basis that the allocation has not be properly assessed or justified**. Our reasons and justification for this position are detailed below, together with revised wording for Allocation O16.

Consideration of Current Uses

Despite the scope of previous representations and the Hearing Statement provided to the Examination Inspector in July 2025, the draft Allocation as amended by the Main Modifications continues to reference an existing Public House on Site. For the reasons set out below, this reference should be removed and replaced with "Restaurant / Bar".

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 for this area 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 a 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.

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.

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. The pending application proposes the replacement of the building which was supported in principle by LBH.*
- 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.*

The above is substantiated by the GLA in their Stage 1 Report that accompanied Full Application Ref: PL/0378/25, where it was noted that the significance of the existing building was low and therefore “the existing Beefeater is not likely to be one that is protected under Policy HC7.” On this basis, the draft Allocation as written (referencing an existing Public House that should be retained) is inaccurate and should be amended to refer to the existing use as a Hotel and Beefeater restaurant and bar.

Public Transport Accessibility Level (PTAL)

Transport for London published their accessibility data set on the GIS Open Data Hub on 6th June 2025. Whilst the supporting text for this notes the respective data was last updated on April 2023, the site as shown on the WebCAT 3.0 Hub has a PTAL 5 in its entirety. The draft Allocation should therefore be amended in this respect given, as presently written, it incorrectly notes the site as having a mixed 4-5 PTAL.

Consideration of Proposed Uses

The draft Allocation as amended by the Main Modifications seeks the provision of (i) a public house / restaurant / bar (ii) a minimum residential capacity of 120 dwelling houses / units; and (iii) a minimum non-residential floorspace of 1,619sqm. Each of these uses and the associated issues that arise are detailed below.

(i) Public House Reprovision

The expansion of allocated uses within the Main Modifications to now include a “restaurant / bar” on site is welcomed. However, on the basis that the intention is for this replacement facility to function in the same way as the existing Beefeater, the allocation now reads as inconsistent within itself. The current use is defined as “Public House with expanded food provision” and the Allocated Use is for “Public House / Restaurant / Bar”. In order to simplify the allocation and (as summarised above) given the Beefeater is not a Public House, the specific reference to “Public House” should be removed.

It is recognised that a replacement restaurant / bar (Class E[b] / *Sui Generis*) across the ground floor frontage of the site would provide a beneficial town centre use to complement and strengthen the Kenton District Centre - delivering an active frontage, natural surveillance and an improved public realm along Kenton Road. An alternative community facility or wider flexible Class E would provide a similarly complementary impact however.

In this respect Kenton Bridge Medical Centre is located at 155-175 Kenton Road, HA3 0YX – opposite the site but located in the London Borough of Brent ('LB Brent'). This GP is currently overcapacity and actively looking to expand its provisions. As part of the public consultation process that preceded the submission of Full Application Ref: PL/0378/25, Whitbread was 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 addition to the Medical Centre at 155-175). 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. This was a point made in our Regulation 19 Representations.

During subsequent pre-application discussions with LBH however, Officers were resistant to including any flexibility for a potential GP or flexible Class E Use at ground floor in lieu of a restaurant / bar. This was on the basis of their considered view that (i) the existing Public House should be protected and retained; (ii) the potential logistical challenges of a GP based in LB Brent expanding into LBH; and (iii) the health care requirements of LBH residents would already be fully catered for in other draft Local Plan allocations. Within the context of the emerging Local Plan and the contextual information about the existing site set out above, none of these are considered robust enough reasons to omit flexibility in the proposed allocated uses – particularly where such may allow scope for additional health care facilities. It should be noted in this regard that the need for flexibility in the draft Allocation was a point to be taken forward by Officers during the respective Hearing. The draft Allocation should therefore be updated to reflect this.

(ii) Residential Quantum

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. This was a key point made in our previous Call for Sites Submissions, both of which sought the delivery of a substantial uplift of residential uses across the Site.

The Regulation 19 Local Plan's draft Allocation referenced the site's “Indicative Residential Capacity” as “109 C3 dwelling houses / units”. Failing to allow for the loss of the hotel, the genuine residential capacity of the Site was considered to be substantially higher than this – as demonstrated by Full Application Ref: PL/0378/25 which, alongside the stipulated 109 Build-to-Rent dwellings (Class C3), also comprised 103 co-living rooms with associated amenity space (*Sui Generis*). Whilst our subsequent Regulation 19 Representations therefore sought for the removal of the hotel and inclusion of a co-living component within the draft Allocation wording, we had no principle concerns with the 109 C3 dwelling houses / units stipulated. It should be noted that the mix of C3 and co-living units across the site was accepted by the GLA and by LPA Officers in Application Ref: PL/0378/25 and not queried by Members in their reason for refusal at the 25th September planning committee.

The Main Modifications however increase the number of units across the site from 109 to 120 whilst also now stipulating this as the “Minimum Residential Capacity” rather than “Indicative Residential Capacity”. The rationale for the new imposition is unclear. The Main Modifications have also removed the specific “C3”

reference from the allocation, though it is not considered this provides any additional flexibility given “dwelling houses” still heavy infers the delivery of self-contained dwellings.

The impact of the above change (having to deliver a minimum of 120 self-contained units), is that the concurrent provision of co-living accommodation on site would now be prejudiced. This therefore presents a more obstructive position than the residential capacity tabled in the Regulation 19 draft Allocation. It is further unclear where the minimum 120 unit figure came from. A Local Plan Allocated Sites Capacity Study (updated June 2025) supported LBH’s Hearing Statement for Hearing Matter 6 and provides high level massing studies for each of LBH’s draft allocations. For draft Allocation O16, 3no. scenarios are modelled:

- (i) “Pub Retained”, where the Beefeater building in its entirety is retained alongside 68 new C3 units;
- (ii) “Pub Reprovided”, where the entire ground floor of the Kenton Road block is delivered as 1,620 sqm commercial floorspace alongside 109 new C3 units; and
- (iii) “Pub and Hotel Reprovided” as 7,834sqm of commercial floorspace alongside 67 new C3 units.

None of the above scenarios are relevant to emerging development proposals for the site nor are any of the above options viable or deliverable.

Application Ref: PL/0378/25 comprises 109 Build to Rent Units and 103 Co-Living units. This should be reflected in the Site Allocation.

With regards to any specific references to co-living accommodation in the draft Allocation, we note LBH’s position flagged during the Hearing for Matter 6, where they confirmed they will not be allocating sites in the Plan for Co-living. The reason for this is not clear and is not a position considered sound and in accordance with national policy. Given the site’s highly accessible location and the demonstrable need confirmed in the Co-Living Needs Assessment submitted with Application Ref: PL/0378/25, amendments are requested to the draft Allocation to ensure there is an allowance for Co-Living accommodation in this location. This will ensure the diverse housing needs of the borough can be met.

(iii) Non-residential Quantum

The Regulation 19 Local Plan relied primarily on the protection of commercial floorspace to meet needs over the plan period. This was reiterated by Officers in the LBH Hearing Statement for Matter 8; with it being further noted that the allocations as drafted (which made provision for 13,900sqm of new retail, food/beverage, leisure and entertainment floorspace) alongside over 21,000sqm of currently vacant retail and leisure floorspace across the borough would be sufficient to address commercial floorspace need over the plan period.

This approach has subsequently been reviewed by the Main Modifications, which has updated the Local Economy section of the Local Plan’s “Strategic Objectives” to stipulate that the full borough need of 35,845sqm of additional non-residential floorspace will be “delivered primarily by way of site allocations”. Of this, 25,360sqm will come forward in the Harrow and Wealdstone Opportunity Area and the remaining 10,485sqm will be delivered on site allocations beyond.

All draft Allocations as amended by the Main Modifications now include a minimum non-residential floorspace capacity. **In the draft allocation, the Site is now subject to a minimum provision of 1,619sqm of floorspace. This quantum of non-residential floorspace is entirely unacceptable and needs to be deleted.** There is no policy requirement in the adopted or emerging Local Plan for the retention of the existing commercial floor area on the site which is much lower than this figure. The site is not located within the secondary retail frontage of Kenton District Centre and therefore there is no policy presumption for the restaurant floorspace to be provided.

Application Ref: PL/0378/25 seeks to provide a total of 472sqm of commercial floorspace in the form of a restaurant / bar. This represents an enlargement of the bar area within the existing Beefeater which LBH and the GLA have agreed to be a suitable and appropriate quantum of non- residential floor space on the site.

Whilst the Borough need for 35,845sqm of additional non-residential floorspace is noted, there is nonetheless no evidence to justify or demonstrate that the site is viably capable of accommodating a substantial increase of non-residential floorspace from 472 sqm to a minimum of 1,619 sqm.

This quantum appears to have been derived from the Allocated Sites Capacity Study referenced above (Scenario [ii]), whereby the entire ground floor of the new Kenton Road massing is given over to commercial uses. This is entirely non-viable and not deliverable. It is not proposed to be delivered on the site in line with the pending application proposals which are due to be determined in March 2025, subject to the GLA's approval which should be forthcoming based on their Stage 1 and Stage 2 Reports.

In the interest of Draft Allocation O16 remaining viability and deliverable, it should be amended in line with Application Ref: PL/0378/25 and reduced to the minimum non-residential quantum of 472sqm.

Flood Zone

The draft Allocation as amended by the Main Modifications references that part of the site is at risk from surface water flooding, with the requirement that development should be directed away from this area. We query this position, as surface water flood risk can be addressed through sustainable urban drainage systems, sensitive landscaping and careful on-site water management. The draft Allocation should therefore be amended to reflect this and to ensure the localised surface water drainage matters do not sterilise areas of the site for redevelopment.

Overall Conclusions

In light of the above, we request the following amendments to the Main Modifications draft of Allocation O16 as provided below in red.

This is fundamental to future proofing the proposed development scheme pending consideration under Planning Application Ref: PL/0378/25. If the GLA approves the proposed development, Allocation O16 as currently drafted by the Council will be inconsistent with the proposed development and the proposed development scheme will be contrary to the adopted Development Plan. This may cause significant planning issues for the consideration of the current application and any future iterations through S73 amendments to the scheme which could undermine the development and complicate and delay the delivery of much needed housing for the Borough and London.

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 public house Restaurant / 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 - Public House with expanded food option Beefeater Restaurant / Bar

Ownership	Private
PTAL	4 to 5
Site source	
Relevant planning applications	PL/0378/25
Site Allocation	
Site objective	<p>A mixed-use development that retains or re-provides a Public House within the Kenton District Town Centre, with an enabling residential element.</p> <p>A mixed-use development which provides residential dwellings 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>Leading land use</p> <p>Public House / Restaurant / Drinking Establishment or Doctor's Surgery</p> <p>Flexible Class E Use</p> <p>Residential (including Co-Living)</p> <p>Town centre uses</p>
Development timeframe	1 – 5 years
Minimum residential capacity	420 109 dwelling houses / units and 103 Co-Living Units (Sui Generis)
Minimum non-residential floorspace capacity	1,619sqm 472sqm
Planning Considerations	
Flood Zone	<p>Critical drainage area</p> <p>Part of the site is at risk from surface water flooding. Development should be directed away from this area in line with the sequential approach or else sufficient surface water drainage / management should be incorporated to ensure risk is mitigated.</p>
Heritage	Protected Views Setting Corridor (Stanmore Country Park Extension Wood Farm)
Other	Town Centre Boundaries (Kenton) RAF Northolt Safeguarding Zone
Development Considerations	
Requirements	<p>Re-provision of public house Restaurant / Drinking Establishment on site or Doctor's 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 Public House Restaurant / Bar 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 residential-led mixed use scheme to be delivered on site.</p> <p>The site can be regarded as an undesignated heritage asset, specifically the 1933 Tudor Revival style Travellers Rest hotel and former off-licence adjacent by Robert George Muir, which have key historic interest as an emblematic reminder of the growing suburban Metroland development of the 1930s that Harrow is known for, and of changing social values and social reform of the time that created 'the Improved Public House'. Any proposals would therefore need to have regard to heritage in accordance with the</p>

	<p>National Planning Policy Framework, the London Plan and heritage policies within this Local Plan.</p> <p>There is a need across both London as a whole and Harrow for tourism infrastructure, specifically with regard to hotels / serviced apartments. The site is in a highly sustainable location and has excellent public transport links to Wembley and Central London. Any loss of tourism accommodation from the site will be assessed in accordance with Policy LE5 – Tourism & Visitor Accommodation.</p> <p>Given the size of the site, an element of residential development is able to be delivered on site in conjunction with a small element of non-residential floorspace the above requirements, and may be is capable of providing more height than which exists in the surrounding area. Whilst the size of the site would allow for more height, care must be taken to respect the much lower form of development, particularly along Carlton Avenue which is represented by two-story dwellings. Any new residential development must demonstrate a high quality of amenity, with particular care in relation to noise and vibration caused by the railway line along the western boundary of the site.</p> <p>Any new development that involves demolition of the existing buildings and new build, must provide an appropriately designed frontage to Kenton Road. This must include both in terms of an active frontage appropriate to a town centre, but also the relationship with Kenton Road, which is a busy carriage way directly adjacent to the site.</p> <p>The site is located in a mixed-use area but within a suburban context, any new development should be progressed following the guidance set out in the Tall Building SPD (Building Heights) SPD (2023).</p>
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Part B

Other Relevant Policies

Comments are provided on other policies in the Plan including:

- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 03: Meeting Harrow's Housing Needs and Policy HO1: Dwelling Size Mix
- Policy HO9: Large Scale Purpose Built and conversion for shared living

Whilst a degree of the points raised in previous representations have been considered and included in the Draft Local Plan, our main principal concerns with the three policies listed above have not. Our relevant and as yet unaddressed concerns are therefore set out again.

Policy LE5: Tourism and Visitor Accommodation

The Main Modifications include a new Subsection (d) added to Part C which will allow the loss of tourist infrastructure on a site where it is being reprovided elsewhere in the Borough with no resulting net loss from borough stocks over the plan period. This addition is welcomed given it accords both with the rationale both of the Harrow Economic Needs Study (January 2024); and with London Plan Policy E10 – the purpose of which is to encourage the enhancement and expansion of a Borough's hotel stock rather than protecting those which are not necessarily meeting modern standards. There is a concern however that supporting paragraph 5.5.6 has not been updated to reflect the additional Subsection (d). This should be reviewed.

Under Subsection (b) of Part C there is also concern with the use of the words: “over-riding public benefits” and the definition associated with this. Our concern in this regard was raised in our Regulation 19 Representations however no justification was provided as to why our suggested amendments were not considered. As set out in these Representations, the term “over-riding” is imprecise and is likely to be applied inconsistently across the Borough. In order to make this assessment site specific and measurable, the benefits in losing a hotel from a site and subsequently redeveloping it for other uses should be benchmarked only against the benefits offered by the existing site. This change would similarly need to be reflected within the respective supporting text.

In light of the above, our suggested amendments to draft Policy LE5 and supporting paragraph 5.5.6 are set out below.

Policy LE5 Tourism and Visitor Accommodation

C. The Council will resist the loss of tourist infrastructure. Any loss of tourism infrastructure will only be supported where:

- a. There is no longer a need for that facility; or
- b. The redevelopment of the site would ~~deliver result in an over-riding~~ public benefits which over-ride those ~~currently provided by the existing uses~~; and
- c. Any change in use or redevelopment complies with other policy requirements of the development plan, or
- d. There would be no net loss from the borough stock over the plan period through reprovision within the borough.

Supporting Text (Paragraph 5.5.6):

Given the London-wide demand for tourism infrastructure, a sufficient supply and range of serviced accommodation should be maintained. Proposals that seek to reduce tourism infrastructure within the borough will be resisted, unless supported by robust justification. A marketing exercise must be carried out in accordance with Appendix 6 and be shown to be unsuccessful. Submitted evidence should accord with the guidance set out in Appendix 6. Alternatively, proposals that result in a loss of tourism infrastructure on a site that would form part of a comprehensive development, would not result in a net loss of hotel rooms in the borough by way of their reprovision elsewhere or, which is demonstrated to deliver result in an over-riding public benefits that override those delivered by the existing site, will be supported.

Strategic Policy 03: Meeting Harrow's Housing Needs and Policy HO1: Dwelling Size Mix

The London Plan places specific emphasis on providing unit mix breakdowns for the affordable housing. Where authorities do seek to set out mixes for private development, it is expected to be *justified and supported by evidence* (in accordance with the test of “soundness” noted in Paragraph 36 of the NPPF). LBH’s Hearing Statement supporting Matter 5 seeks to justify the Regulation 19 policy provision for a minimum of 25% of all new units being family sizes on the basis that this provides an appropriate balance between optimising the output of a particular site whilst also increasing the provision of family housing borough-wide.

The Main Modifications however now seek to increase this minimum family provision to 35%. The justification given for this is to “reflect the evidence base”. By the LBH Matter Statement’s own admission, the original stipulation of 25% of units being family sized was “broadly viable and deliverable”. It further noted that “a target significantly higher than 25% would not accord with the London Plan Policy H10”. Accordingly, whilst the evidence base may suggest a greater need for family dwellings, there should be other factors (such as viability, site optimisation and site constraints) that are considered as part of an appropriate balance.

Another such factor is that recognised in Paragraph 32 of the Harrow Local Housing Needs Assessment Update (2024), which recognises that existing family homes may already be occupied by sharing young households – and that, in its support for the Private Rental Sector, “if high quality housing for single people or couples could be built”, this may free up such existing family units. This would be particularly pertinent in areas which already have a high proportion of 3 or more beds.

The Main Modifications increasing the minimum provision of family units from 25% to 35% is therefore not justified. Both draft Strategic Policy 03 and Policy HO1 should be amended to revert back to the 25% provision.

Policy HO9: Large Scale Purpose Built and conversion for shared living

Whilst the Main Modifications propose a number of changes to this draft Policy, these changes do not address the more fundamental issues with the draft wording – those that were flagged in our Regulation 18 and 19 Representations and followed through into our Hearing Statement compiled for Matter 6.

Subsection (a) of the draft policy continues to require an applicant to submit evidence on identified housing need based on local incomes, rent levels and existing/future demographic. Whilst it is agreed that any proposals for shared-living accommodation should meet a “local housing need”, the parameters detailed in part (a) which require further assessments of local incomes, rent levels and existing and future demographics are considered unduly onerous on the basis that much of this information is already contained within the Strategic Housing Market Assessment which forms part of the Local Plan Evidence Base.

It is understood that part (a) of this emerging policy emerged from Harrow’s Local Housing Need Assessment Update (February 2024)¹ (‘the Update’) which, itself, builds upon the West London Strategic Housing Market Assessment. The Update states the following within paragraph 5.82 in relation to co-living:

“The issue of co-living, the private rented sector, student accommodation and HMOs is complex, but there is no clear rationale for promoting co-living as an active policy in Harrow. The area does not have a high student population compared to other areas of London and the households projections show a limited projected rise in younger sharing households. This would also imply that HMOs would not be expected to rise for younger sharing households, but there is projected to be a large growth in multi-generation living.”

The above suggests a misunderstanding of the demographics for whom co-living is targeted. By its very design and operational nature, co-living accommodation is more 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. However, co-living does not specifically seek to target student populations nor indeed any specific demographic. It is open and available to all.

In this regard, there is no need to have an existing large student population in situ to meet demand. Rather, co-living is central to meeting housing demand at a strategic level across London anchored in accessibility. It is therefore a key product which plugs the gap for those that are unable to access the housing market through more traditional home ownership – or else are unwilling to do so on the basis that such fails to meet the needs of their lifestyles. The demand for and attraction of co-living accommodation would also result in the freeing up of larger family homes which, presently, may already be occupied by sharing young households. As noted above, this is a point recognised in Paragraph 32 of the Harrow Local Housing Needs Assessment Update (2024).

In this respect, the focus in Subsection (a) on “need” also 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. Catering to a demand, co-living accommodation may keep the existing target demographic in the Borough whilst also attracting new residents into the Borough who, previously, may not have considered such a move.

Accordingly, it is suggested that subsection (a) be reworded to allow greater scope to demonstrate how shared-living accommodation better meets local needs and demands than conventional housing.

¹ Harrow Local Housing Need Assessment Update (February 2024)

Subsection (b) of the draft policy continues to require 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 with other more conventional housing types.

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.

Subsection (c) of the draft policy continues to require co-living developments be located only within the boundaries of the Harrow and Wealdstone 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 one area of the borough.

Subsection (d) of the draft policy continues to require that no two LSPBSL schemes should be within a 250m walking distance of one another, unless robust evidence is provided as to the unviability of other uses. This provides a direct contradiction with Subsection (c) which otherwise requires this form of development be contained within the Opportunity Area. 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, Subsection (d) in tandem with Subsection (c) would unreasonably and detrimentally restrict the delivery of LSPBSL to meet need and demand within LB Harrow and London as a whole. Even in the event that the below referenced changes to Subsection (c) are accepted however, Subsection (d) would remain unsound as it would similarly conflict with Subsection (a). Where there is a demonstrable need and demand for LSPBL accommodation, then its principal should be supported in order to meet this need and demand - regardless of whether there are other similar schemes in close proximity. . The policy as drafted is therefore unsound, would contradict the NPPF and would not be in keeping with the London Plan.

Subsection (e) of the draft policy continues to restrict the coming forward of LSPBSL schemes on sites with extant permission or allocated for self-contained dwellings unless evidence is submitted to demonstrate viability issues of conventional housing coming forward. This subsection should be worded more positively to allow LSPBL accommodation to co-locate alongside allocated / permitted self-contained dwellings, particularly where extant permissions are already in place for schemes comprising LSPBSL.

Subsection (g) of the draft policy continues to require shared-housing proposals to demonstrate potential capabilities in converting to Class C1 (hotel) or Class C3 uses in the future without the need for demolition and rebuild. Whilst a capability to convert to C1 is considered feasible given similarities in internal layouts; programming in the capability to convert to C3 is considered problematic. By its very nature, C3 dwellings require different servicing and fire management strategies from that of a shared-living or hotel building so it would be unduly onerous to require a shared-living building to be capable of adaption to C3.

Based upon the above assessment, the following amendments are suggested to Parts (a), (b), (c), (d) and (g) of draft Policy HO9:

<i>Policy HO9: Large scale purpose built and conversion for shared living</i>

A. Proposals for large-scale purpose-built shared living (LSPBSL) and the conversion (or change use) of existing buildings for shared living will be supported where they comply with London Plan Policy H16 and the following requirements:

- a) Proposals will be required to demonstrate how they ~~are better suited to meeting an identified the local housing need and demand than conventional housing based on local incomes, rent levels and existing/future demographics of the Borough~~
- b) ~~Applicants will be required to demonstrate the affordability of the proposed LSPBSL products within their scheme compared with the alternative products within the Harrow private rental sector,~~
- c) Proposals should be located within ~~areas the boundaries of Harrow Metropolitan Centre and Wealdstone District Centre (with a PTAL of 4 5-6 and demonstrable good access to local amenities). that form part of the Opportunity Area~~
- d) ~~There must not be two LSPBSL schemes (including sites with permission) within a 250m walking distance of each other to avoid an over-concentration of similar uses, unless robust evidence demonstrates the site will not be suitable or viable for appropriate alternative uses.~~
- e) Proposals on sites with extant permission or allocated for self-contained dwellings will only be supported where either such could be co-located whilst not substantially prejudicing the quantum or quality of the allocated or permitted conventional housing coming forward; or where adequate evidence is submitted to demonstrate viability issues ~~to avoid compromising the delivery of conventional housing to address future needs~~ in bringing the allocated or permitted conventional housing forward to address future needs.
- g) To support a circular economy, proposals must demonstrate a flexible design and layout to allow the LSPBSL scheme to be converted/retrofitted to an C1 hotel ~~or C3 self-contained residential uses~~, or other town centre uses without the need for ~~substantial~~ demolition and rebuild

Conclusion

As detailed above, there are fundamental issues remaining with the Main Modifications to the Draft Local Plan as currently written. Both individually and combined, these issues fail the tests of soundness as a requirement of Paragraph 36 of the National Planning Policy Framework ('NPPF'). In the event the Plan is adopted as written, it would actively frustrate growth in LB Harrow by impeding the delivery of much needed and in-demand housing; and prejudicing the sustainable reuse of an accessible Town Centre brownfield site. To avoid such circumstances, we request the above changes are made to the Draft Local Plan.

Should you wish to speak with us regarding any aspect of this submitted representation, please either contact my colleague Andrew Lightstone [REDACTED]

Yours sincerely

Nicola Forster
Director