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11.12.25

FAO Planning Policy Team
Harrow Council
278 Station Road
Harrow
HA1 2XH
Via Email

Dear Sir/ Madam,

Representations on Harrow's New Local Plan - Main Modification (Published November 2025)

This letter has been prepared by HTA Design LLP (HTA) on behalf of our client, Tide Construction, to provide comments on the New Harrow Local Plan Proposed Main Modifications presented in the schedule of proposed modifications (November 2025) following Examination in Public ('EIP') hearing sessions held across June, July and October 2025. Following these sessions, the Inspector has requested that the London Borough of Harrow ('LBH') consult on a set of proposed Main Modifications.

Our client owns land known as Queens House Car Park, located on Kymberley Road, Harrow, HA1 1YH ('the Site'), and is seeking to bring forward the Site for comprehensive redevelopment for a new co-living scheme in the heart of Harrow Town Centre.

We have previously provided comments at both the Regulation 18 and Regulation 19 consultation stages and submitted an accompanying Call for Sites for the comprehensive redevelopment of the Site for c.466 new co-living units, which has culminated in a site allocation in the Draft New Harrow Local Plan ('the Plan').

This letter addresses the following proposed Main Modifications ('MM') to the Local Plan to ensure that the New Local Plan can be found sound by the Inspector:

- Policy OA1 - MM62
- Housing Trajectory - MM61
- Policy HO9 - Large Scale Purpose-Built and Conversions for Shared Living - MM27

Site Allocation OA1 – MM62

Queen's House Car Park has been allocated for redevelopment under Policy OA1 within Chapter 11 of the submission version of the Plan. The Site objective has been defined in policy for a mixed-use development that provides high quality residential homes and appropriate town centre uses the Harrow Metropolitan Town Centre, while ensuring a satisfactory re-provision of car parking spaces. New development will improve the quality of the character of the area and enhance the public realm and local connectivity.

We are broadly supportive of the proposed Main Modifications to the site allocation wording. We welcome the introduction of minimum indicative residential capacity figures,



which provide additional clarity, and the removal of the explicit requirement to retain on-site car parking. The amendment improves the effectiveness of the policy and aligns with principles in the wider plan, principally Local Plan Policy M2B, as well as national and regional guidance supporting car-free development in highly accessible urban locations.

We object to the proposed requirement for 2,119 sqm of non-residential floorspace within the site allocation. It is unclear what evidence base underpins this specific quantum, and no supporting material has been identified that demonstrates the figure has been subject to robust testing through the preparation of the Plan. In the absence of a clear justification linked to identified town centre or employment needs, the requirement cannot be considered soundly based.

Initial capacity testing undertaken by HTA indicates that accommodating this level of non-residential floorspace within the Site's physical and policy constraints would be highly challenging and would materially inhibit the Site's ability to optimise residential delivery. When combined with other policy requirements, including cycle parking and servicing provision, the requirement appears disproportionate and risks directly undermining the delivery of much-needed housing, contrary to the Plan's strategic housing objectives.

While we support the delivery of active ground floor uses that positively contribute to the town centre, the rigid specification of a minimum non-residential floorspace quantum is likely to result in an undeliverable outcome. The allocation would be more effective if it allowed for flexibility in the type and amount of non-residential uses, to be determined through detailed design, viability considerations and demonstrable demand at application stage.

We also object to the proposed modification that directs development away from the southern and eastern parts of the Site on the basis of surface water flood risk. Flood risk management is already comprehensively addressed through the Local Plan's strategic policies, which provide an appropriate framework for assessing and managing both fluvial and surface water risk. These matters should be dealt with through a site-specific Flood Risk Assessment and a design-led approach at the planning application stage.

The inclusion of prescriptive spatial constraints within the site allocation is therefore unnecessary and risks reducing flexibility, constraining site layout options, and limiting the Site's capacity to respond effectively to other policy requirements. As drafted, the modification may adversely affect deliverability.

Pre-application design strategies to-date have been progressed based on a co-living scheme, which can deliver c.466 units.

Co-living housing represents a form of large-scale purpose-built shared living which has emerged internationally in response to a range of interrelated economic, social and environmental challenges associated with increasingly urbanised populations. These include affordability pressures within the private rented sector, the need for more sustainable and efficient use of land, changing lifestyle and work patterns, and increasing levels of social isolation. As a housing typology, co-living typically comprises high-quality, self-contained private accommodation alongside generous, well-managed shared facilities, designed to promote interaction, flexibility and long-term community cohesion.

Co-living developments are characterised by smaller private living spaces balanced with a much higher level of shared, professionally managed communal provision, including co-working areas, social spaces and wellness facilities. This reflects a conscious choice by



residents to prioritise access to high-quality shared amenities and a connected lifestyle, supported by flexible rental arrangements that can adapt to changing personal circumstances. As such, co-living provides a distinct residential offer that complements, rather than competes with, traditional forms of housing delivery.

Large-scale purpose-built shared living schemes are particularly well suited to accessible town centre locations, where high levels of public transport accessibility, services and employment opportunities can be accessed without reliance on private car use. In this regard, the emerging development proposals for the Site are located within a highly sustainable location, benefitting from excellent public transport connectivity and alignment with the spatial strategy for growth set out in the Plan. This approach is consistent with London Plan Policy H16, which supports the delivery of large-scale purpose-built shared living in highly accessible locations, particularly within town centres and opportunity areas.

The proposed approach to development on this site also strongly aligns with the objectives of the NPPF, which places substantial weight on the effective use of suitable brownfield land within settlements to meet housing needs. Co-living schemes can make efficient use of constrained urban sites while delivering high-quality living environments, supporting both housing supply and town centre vitality. In doing so, this form of development can contribute positively to wider regeneration objectives by introducing residents who actively support local services, businesses and the evening economy.

Considering the above, the current site allocation does not fully reflect the potential for co-living accommodation to come forward as part of an efficient and policy-compliant redevelopment of the Site. We therefore request that the allocation is amended to positively plan for the delivery of co-living accommodation. This should include explicitly recognising co-living as an appropriate land use within the allocation, updating land use terminology, and revisiting the indicative site capacity to reflect the potential for a large-scale purpose-built shared living scheme to be delivered in this highly sustainable location.

These amendments would ensure that the allocation is positively prepared, justified by the site's locational characteristics, and consistent with both national and London-wide planning policy, while maintaining flexibility to secure a high-quality, deliverable development outcome.

To ensure the allocation is effective, justified and capable of being delivered over the plan period, we request that the Council:

- Provides clear evidence to justify the requirement for 2,119 sqm of non-residential floorspace, or amends the policy to introduce more flexible, criteria-based wording; and
- Removes the prescriptive wording directing development away from specific parts of the site on flood risk grounds, relying instead on the Plan's strategic flood risk policies and application-stage assessment; and
- Update the policy wording to reflect co-living as a potential land use.

Housing Trajectory – MM61

The projected housing trajectory for the Local Plan includes all proposed site allocations, detailing the residential capacity and the projected timings for year-on-year capacity. Queens House is defined as having a minimum residential site capacity of 142 new homes



which are projected to come forward in a single year between 2031-2032. It's unclear what data or evidence has informed this delivery period. Our client anticipates earlier delivery of co-living development than projected, certainly within the first five years on the plan period.

Tide Construction is a development and contracting company and has a strong track record in delivering projects using their accredited off-site manufacturing system, Vision Volumetric. As a result, projects are typically delivered substantially quicker than traditional build, often resulting in a 50% or greater programme savings and a 40% reduction in embodied energy compared to a traditional construction. The Vision Volumetric system will therefore enable early delivery of project. We therefore request that the housing trajectory figures are adjusted to reflect early delivery.

Policy HO9 - Large Scale Purpose-Built and Conversions for Shared Living - MM27

We do not consider that the proposed Main Modifications to Policy HO9 address the fundamental soundness issues identified in our previous representations. As modified, the policy continues to not be positively prepared, nor justified by the evidence base and is therefore inconsistent with national policy and the London Plan.

Whilst we support the principle of Main Modifications seeking to clarify the Council's approach to large-scale purpose-built shared living (LSPBSL), the revised wording continues to impose unjustified and overly restrictive criteria which are not required by London Plan Policy H16 or the GLA's Large-Scale Purpose-Built Shared Living London Plan Guidance (February 2024). As a result, the policy continues to risk constraining delivery in the Borough's most sustainable locations. Our comments focus on criteria a, b, d and f.

Criterion A, a) – Local Housing Need Test

The Main Modifications retain the requirement for proposals to demonstrate how they meet an identified local housing need based on local incomes, rent levels and demographic trends. This remains unjustified and is not required by London Plan Policy H16 or the associated LPG.

The Main Modifications do not introduce any new evidence to demonstrate why such a test is necessary, nor how it would be applied consistently or objectively at decision-making stage. The retention of this requirement introduces unnecessary uncertainty and risks rendering otherwise policy-compliant schemes unacceptable.

The Inspector is therefore requested to recommend deletion of this criterion in full, to ensure conformity with the London Plan and a positively prepared housing strategy.

Criterion A, b) – Affordability

The modified wording continues to require applicants to demonstrate affordability when compared to alternative Private Rented Sector products in the Borough.

Co-living is not defined as affordable housing within either national policy or the London Plan and is treated as a distinct housing typology, with affordable housing secured via a payment in lieu mechanism. The affordability comparison requirement therefore remains inappropriate and inconsistent with London Plan Policy H16.

The Main Modifications do not provide justification or clarity as to how this requirement aligns with the strategic policy framework, nor do they address concerns around deliverability. This criterion should be removed to ensure the policy is justified and effective.



Criterion A, d) – Concentration of LSPBSL

While the Main Modifications seek to reframe the Council's approach to concentration, the policy continues to apply a prescriptive approach which risks being applied arbitrarily. The GLA LPG is clear that policies should identify where concentrations are emerging based on evidence and should remain sufficiently flexible to respond to local circumstances.

The Main Modifications do not identify such evidence or specific locations where concentration is harmful, nor do they explain why fixed thresholds or exceptional circumstance tests are necessary. As modified, this part of the policy continues to risk undermining delivery in highly sustainable town centre locations.

Further flexibility is required to ensure the policy is positively prepared and consistent with London Plan guidance.

Criterion A, f) – Ground Floor Uses

The Main Modifications continue to apply prescriptive ground floor use requirements, including workspace and publicly accessible amenities. While active frontages are supported in principle, the modified policy does not sufficiently acknowledge site-specific constraints or viability considerations.

The retained wording risks imposing uniform requirements across all proposals regardless of context and remains inconsistent with a design-led, place-based approach. This may adversely affect deliverability, particularly on constrained urban sites.

The policy should instead adopt aspirational, criteria-based wording to ensure flexibility and effectiveness.

In summary, the proposed Main Modifications do not adequately address the fundamental soundness concerns raised in relation to Policy H09. As modified, the policy remains:

- Not positively prepared
- Not justified by the evidence base
- Inconsistent with national policy and London Plan Policy H16

The Inspector is therefore requested to recommend amendments to policy wording, removing outstanding restrictive and unjustified criteria identified above, ensuring that Policy H09 provides a flexible, deliverable and policy-compliant framework for large-scale purpose-built shared living.

Conclusion

We have previously provided representations at both the Regulation 18 and Regulation 19 consultation stages, and our client remains committed to bringing forward the redevelopment of this important town centre site. It is therefore essential that the matters raised in this letter are fully considered to ensure the Plan is sound and capable of supporting the timely delivery of the Site.

We trust that these representations offer a clear and constructive assessment of the relevant policies and proposed Main Modifications. We request that our comments are taken into account as part of the final amendments to the Plan. We would be grateful for written confirmation of receipt of this submission at your earliest convenience. Please do not hesitate to contact me should you have any queries regarding our consultation response.



Yours sincerely,



Senior Planner

For HTA Design LLP