



New Harrow Local Plan 2021-2041

Site selection / allocation methodology

February 2025

1. Introduction

- 1.1 The London Borough of Harrow (the Council) is preparing a new Local Plan that sets out how the Borough should develop over a 20 year period (2021-2041). The draft Local Plan includes a spatial vision, a strategic objectives and strategy, strategic policies and a series of more detailed non-strategic policies that set out principles for the assessment of applications for development. The Plan aims to achieve a sustainable pattern of development in line with national planning policy and the London Plan (2021).
- 1.2 The plan is supported by a series of proposed site allocations, which set out a pipeline of sites which are appropriate for development and will meet the development requirements of the Borough, including the need for additional housing and supporting infrastructure. This report sets out the approach which was used to identify, assess and select sites for allocation in the draft Local Plan.
- 1.3 This report includes the following sections:
 - *Chapter 1 – Introduction:* Provides an overview of the report
 - *Chapter 2 – Policy Context:* Outlines the broader policy context which the site assessment was carried out
 - *Chapter 3 – Background:* Provides details on how site selection and assessment is related to other parts of the Local Plan preparation process and to the Local Plan evidence base
 - *Chapter 4 – Site selection methodology:* Sets out the detailed methodology used to identify potential sites and to select these for allocation in the draft Plan
 - *Chapter 5 – List of sites:* Lists the sites which were assessed and included or excluded from allocation in the Local Plan
 - *Appendix A – Development density evidence:* Sets out evidence for an uplift on indicative residential capacities in proposed allocations to be used in the housing trajectory
 - *Appendix B – Comparative site suitability analysis:* Outlines an analysis of the relative suitability of sites with respect to several key planning issues, although the results of this appendix are not intended to provide a full picture of site suitability or to prejudge which sites should be selected. It serves as a sense-check to the proposed site allocations.
 - *Appendix C – Site Selection / Allocation Methodology:* This document demonstrates that draft allocated sites, comply with the Sequential and where applicable, the Exceptions Test.

2. Policy Context

National Planning Policy Framework (NPPF)

- 2.1 The National Planning Policy Framework (NPPF) (2023) sets the overarching policy context under which the Local Plan has been prepared, and under which sites have been identified, assessed and proposed for allocation within the draft Plan.
- 2.2 The NPPF sets the purpose of the planning system as contributing to the achievement of sustainable development. Plans are expected to provide for objectively assessed needs for housing and other uses unless adverse impacts significantly and demonstrably outweigh the benefits of doing so (paragraph 11). Strategic policies in development plans should provide a clear strategy for bringing land forward to meet these needs, including “planning for and allocating sufficient sites to deliver the strategic priorities of the area” (paragraph 23).
- 2.3 Local plans are required to be justified and effective, taking into account reasonable alternatives (paragraph 35), and to be underpinned by relevant and up-to-date evidence (paragraph 31). This document sets out the decision-making process and evidence for the site selection process, and how it relates to the broader evidence base and reasonable alternatives.
- 2.4 Paragraph 69 provides more detail around the need for sites to meet housing requirements. It notes that policy-making authorities should have a clear understanding of land availability through the preparation of a strategic housing land availability assessment (part of a housing and economic land availability assessment, discussed under Planning Practice Guidance below). From this, a supply of sites should be identified, taking into account their availability, suitability and likely economic viability. This should provide five years supply (post-adoption) of deliverable sites, and identify specific, developable sites or broad locations of growth for years 6-10 and 11-15 of the plan period. Sites have been proposed for allocation in the draft Harrow Local Plan to achieve this.
- 2.5 A supply of sites is also to be identified to meet the scale and type of development likely to be needed for town centre uses, with appropriate well-connected edge of centres sites to be allocated if town centre sites are not available (paragraph 90).

- 2.6 The NPPF provides guidance on the most appropriate places for development. As much use as possible is to be made of brownfield land (paragraph 123), and sustainable transport is to be encouraged (paragraphs 108-113). Planning policies are to promote an efficient use of land at appropriate densities, balanced against infrastructure availability and the desirability of maintaining the prevailing character and setting (paragraph 128). Green Belt land is specifically protected, with alterations to boundaries only to be made where exceptional circumstances are fully evidenced and justified (paragraph 145), and after examining all other reasonable options for meeting identified needs (paragraph 146). Inappropriate development in areas at risk of flooding should be avoided by directing development away from the areas at highest risk (paragraph 165). Where this is not possible then development sites must be subject to both the sequential and exception tests.

Planning Practice Guidance (PPG)

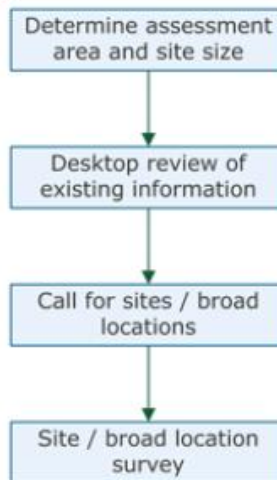
- 2.7 The *Housing and Economic Land Availability Assessment* (HELAA) Planning Policy Guidance (PPG) provides guidance on how to identify a suitable, available and achievable future supply of land for housing and economic development. The PPG highlights that a land availability assessment provides information on the range of sites available to meet local needs, after which it is the role of development plans to determine which sites are most suitable to meet requirements.
- 2.8 Figure 1 below shows the PPG's method for site identification in a HELAA. Site identification and assessment, as outlined in this report, has been carried out in a manner consistent with the PPG. According to the PPG, Sites are to be identified in a proactive survey from a wide variety of sources and a potential call for sites. Sites are then assessed for suitability, availability and achievability and capacity determined in an iterative process until housing and economic land requirements can be met.

London Plan

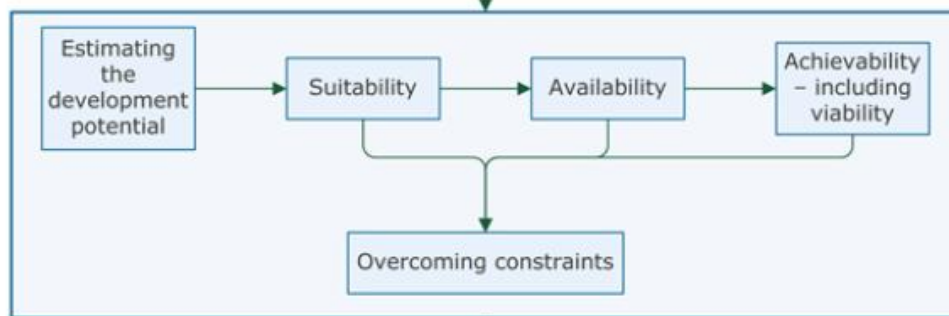
- 2.9 There is a statutory requirement for Harrow's Local Plan to be in general conformity with the London Plan. Among other things, this means that Harrow's local housing requirement is set in the London Plan to be 8,020 net additional homes (or 802 per year) between 2021/22 - 2031/32. This includes a small sites allowance of 375 dwellings per year, as well as development in the Harrow & Wealdstone Opportunity Area (which is identified in the London Plan), and in other parts of the Borough.
- 2.10 The London Plan also provides a variety of directions on appropriate locations for development and appropriate land uses under designations like Strategic Industrial Land (SIL). This includes prioritising development in opportunity areas and near town centres and other well-connected locations, protecting industrial land and protecting the Green Belt and Metropolitan Open Land from inappropriate development.

Figure 1 - Site identification process for a Housing and Employment Land Assessment

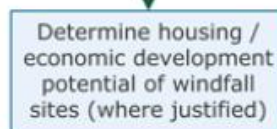
Stage 1 - Site / broad location identification



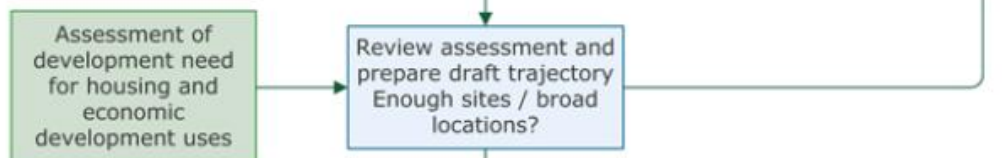
Stage 2 - Site / broad location assessment



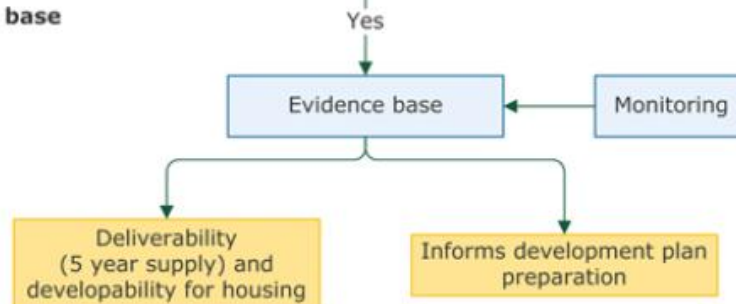
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



Existing Local Plan

2.11 Harrow's Local Plan currently comprises a number of development plan documents (DPDs) including:

- a) Core Strategy – adopted February 2012
- b) Development Management Policies – adopted July 2013
- c) Harrow and Wealdstone Area Action Plan (AAP) – adopted July 2013
(includes site allocations)
- d) Site Allocations – adopted July 2013

The above is accompanied by the Policies Map.

2.12 Of these, the site Allocations Plan and Harrow and Wealdstone AAP allocate sites for development. As outlined later in this report, these sites have been reviewed and have formed one of the sources of sites to be allocated in the draft Local Plan. Once adopted, the draft Local Plan will supersede the current plan.

3. Background

- 3.1 Site allocations have been identified with the intent of meeting the Borough's identified housing requirement over the plan period, including a buffer to accommodate potential under-delivery. Further sites have also been allocated where required to accommodate additional non-residential and infrastructure development to meet identified need.

Housing need

- 3.2 The draft Local Plan sets out a housing requirement for the Borough of 16,040 net additional homes during the 20-year plan period (2021/22 – 2040/41), or 802 per year. Sites have been selected and allocations incorporated into the draft Plan order to provide a deliverable pipeline of sites to meet this need and an appropriate buffer.
- 3.3 Over the first ten years of the plan period (2021/22 – 2030/31) this is the target set in the London Plan (2021). As noted in the London Plan, its housing targets "are the basis for planning for housing in London" and do not need to be revisited by Boroughs in local plan preparation unless there is "additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this plan". The London Plan target of 802 dwellings per year has been rolled over into the last ten years of the plan period.

Employment land need

- 3.4 The draft Local Plan aims to create over 1,000 additional jobs over the plan period which is largely intended to be accommodated within the Harrow & Wealdstone Opportunity Area, consistent with the London Plan.
- 3.5 The draft Local Plan also details additional employment floorspace requirements from the evidence base of 13,900sqm of retail, food/beverage, leisure and entertainment floorspace; and 6,000 sqm of industrial floorspace. In response Strategic Policy 4 notes that town centres are the most appropriate places for town centre uses, but existing vacancies should be able to accommodate the 13,900sqm needed. It also states that industrial land and uses should be protected.

Strategic locations for growth

- 3.6 The spatial strategy and strategic policies in the Draft Local Plan provide a strategy for the parts of the Borough which are most appropriate for growth and where growth is intended to occur. These have been drafted in compliance with direction provided by the NPPF and London Plan. Parts of the spatial

strategy and strategic policies with a direct bearing on the location of development include that:

- (a) The Harrow & Wealdstone Opportunity Area is intended to be the part of the Borough experiencing the most growth including substantial numbers of new homes and jobs;
- (b) The Harrow Town Centre will host adaptable mixed-use and residential development, and employment uses will be bolstered;
- (c) Wealdstone will be transformed by the intensification of employment and carefully managed redevelopment of surrounding industrial estates;
- (d) The Boroughs other Town Centres will accommodate development opportunities commensurate to their character, role and function;
- (e) Open Land, Green Belt and other open space will be maintained and enhanced, with access to green infrastructure enhanced;
- (f) Strategic Policy 7 states that Green Belt and Metropolitan Open Land will be protected from inappropriate development, and that development will not be permitted on designated open space other than for small-scale ancillary facilities needed to support or enhance the proper functioning of the open space;
- (g) Appropriate development will occur on small brownfield sites in sustainable locations close to town centre and train and underground stations;
- (h) The leafy, suburban character of the Borough's residential Metroland areas, outside sustainable locations, will have been safeguarded as areas of low density, family housing; and
- (i) A sufficient supply of industrial land will be provided and maintained to secure the vitality and viability of the Borough's town centre network and meet local needs.

3.7 The above is considered to be consistent with the NPPF and London Plan.

Relationship to evidence base

3.8 The draft Local Plan has been prepared, and sites have been identified, assessed and selected, consistent with a suite of evidence base documents. These include:

- (a) Harrow Local Plan Integrated Impact Assessment 2024
- (b) Harrow Character and Tall Buildings Study 2021
- (c) Harrow and Wealdstone Opportunity Area Tall Buildings Study 2024
- (d) West London Employment Land Review 2022
- (e) Harrow Infrastructure Delivery Plan
- (f) Harrow Local Housing Needs Assessment 2024
- (g) Harrow LIN Housing Needs Assessment 2023
- (h) Gypsy and traveller accommodation needs (provisional outputs from pan-London assessment undertaken by the GLA)
- (i) Harrow Town Centres Economic Needs Study 2024
- (j) Strategic Flood Risk Assessment – Level 1 (West London) and Level 2 (Harrow)
- (k) Harrow Local Plan Viability Assessment

4. Site selection methodology

4.1 The following broad steps were taken in the identification, assessment and selection of sites. These steps are outlined in more detail below.

1. Site identification
2. Initial site eligibility sifting
3. Site selection and suitability assessment
4. Detailed assessment (including site availability and deliverability)
5. Capacity identification

Stage 1: Site identification

4.2 Sites in the following categories were considered for allocation in the Local Plan:

- (a) All sites submitted in call for sites (discussed below)
- (b) All unimplemented allocations,
- (c) Existing Council major development sites or infrastructure projects,
- (d) Strategically placed large retailing sites with large car parks, even if they had not come forward during call for sites

4.3 A review of other types of sites was also conducted, including sites identified in the 2017 London SHLAA, surplus land in public ownership, and vacant, derelict and underutilised land and buildings.

Call for sites

4.4 A call for sites was carried out at the same time as the Regulation 18 (first) consultation on the draft Local Plan. The call for sites was advertised along with the Regulation 18 consultation through multiple means including on the Harrow Council website and by email to interested parties registered on the Local Plan mailing list. Council's estates team was also invited to submit surplus land in Council ownership through this process.

4.5 In addition, a variety of owners and agents for potential development sites were contacted and advised of the call for sites process. Site owners were identified through land titles. The following categories of sites were contacted:

- (a) All unimplemented allocations from the current Local Plan
- (b) Major sites with planning permission which has lapsed or where construction/development has stalled
- (c) Major sites where pre-application advice has been sought
- (d) Major sites where planning permission has been rejected (providing that development of the sites would not contravene the spatial strategy in the draft Local Plan)
- (e) Supermarkets and retail parks with large car parks

- (f) Other large properties in the Opportunity Area which have not come forward for development

4.6 Owners and agents were only contacted where development would not contravene the strategic policies of the draft Local Plan.

Stage 2: Initial site eligibility sifting

4.7 As an initial sift of sites, their size and capacity were considered. Sites were only considered for allocation if:

- (a) They were over 0.25 ha in area, or
- (b) They could yield 10 or more dwellings, or at least 500sqm net of employment floorspace

4.8 Sites which did not meet these criteria were not considered to be sufficiently large to merit site allocation. Six sites were excluded through this process (four sites submitted in call for sites and two existing allocations).

4.9 In addition, existing allocations were excluded from consideration at this stage if the site was already delivered, or was expected to be delivered before plan adoption. In these cases, if only part of the site had been delivered the remainder of the site was considered by itself.

Stage 3: Site selection and suitability assessment

4.10 An assessment of the suitability for proposed development of each not discounted in the initial sieve was carried out, including the following:

- (a) Whether the proposed development contravenes the spatial strategy or strategic policies in the Draft Local or would be in contravention of the London Plan, which forms part of the development plan for the borough and which the draft Local Plan needs to be in general conformity with.
- (b) Whether the site is in the green belt, metropolitan open land (MOL) or designated open space
- (c) Whether the site is in industrial use or on land designated for employment use
- (d) Site context and potential impact of development on suburban character
- (e) Public Transport Accessibility Level (PTAL) rating and public transport accessibility
- (f) Whether the site is in the Harrow & Wealdstone Opportunity Area
- (g) Access to open space, centres, schools and GP surgeries
- (h) Flood designations (Consideration against both Sequential and Exception Tests)
- (i) Potential impacts on heritage items, precincts and views
- (j) Potential impacts on SINC's and protected trees

4.11 All of these factors above were considered in order to obtain a full picture of site suitability, comparing sites with the requirements and policies of the NPPF, PPG, London Plan and draft Local Plan. From this assessment, the factors

listed Table 1 resulted in the exclusion of sites considered to be unsuitable for development.

4.12 These factors were not the only reasons that a site could have been excluded from consideration, and additional exclusions would have been applied if they made a site unsuitable for allocation. For example:

- (a) Sites with significant flood affectation (as informed by the Sequential and Exceptions Tests)
- (b) Sites with had an unacceptable impact on a heritage conservation area or SINC
- (c) Sites with significant contraventions of other policies

Reasonable alternatives

4.12 Sites excluded for these reasons shown above contravene draft Local Plan policies which have been tested against reasonable alternatives during the local plan process and through integrated impact assessment (IIA).

4.13 The IIA tested alternative spatial strategies:

- (a) The preferred strategy (see section 3 above)
- (b) Alternative 1: Retain existing spatial strategy
- (c) Alternative 2: Seek to go beyond the level of development identified in the proposed strategy. As set out in the Regulation 18 Draft Local Plan and IIA, this alternative would meet a greater proportion of the Borough's objectively assessed housing need. However, doing so would require developing Green Belt, designated open space and/or MOL sites, employment land and sites in less sustainable locations, or require development at densities and heights significantly above the predominately suburban nature of most of the Borough.

4.14 Allocation of additional sites in the green belt, MOL or employment land sites would correspond to alternative 2. The IIA identified a number of minor or significant positive effects of the preferred strategy and no negative effects. It identified that alternative 2 had many of the same positive effects but carried significant negative effects to biodiversity and geobiodiversity; historic environment; landscape and townscape; and water and soil.

Table 1 – Site exclusion criteria

Criteria	Considerations	Details	Justification
Green Belt & MOL	Is the site inside the Green Belt or Metropolitan Open Land? Is the use proposed a green belt use?	Sites in the Green Belt or Metropolitan Open Land were excluded if the proposed development was not an appropriate green belt use.	Development of the Green Belt or Metropolitan Open Land would be inconsistent with the London Plan and Council's draft spatial strategy. Furthermore, it is considered that exceptional circumstances for allocation of green belt sites for development do not exist. Council's housing requirement as set in the London Plan (and carried forward for the full plan period) is capable of being met without allocation of Green Belt sites through: <ul style="list-style-type: none"> • Proposed allocations • The development pipeline (under construction or with planning permission), and • A small-sites windfall allowance consistent with the London Plan As a result, allocation of green belt sites is not required and would contravene the provisions of the NPPF.
Open space	Is the site on designated open space?	Sites in designated open space have been excluded from allocation for development	Designated open space sites were not considered suitable for development, and development of them would be contrary to Council's draft spatial strategy. The evidence base supporting the Local Plan identifies a deficiency in open space in the borough.
Employment land	Is the site a designated employment site, or otherwise in industrial use?	Sites with industrial designation or use were only allocated for development if: <ul style="list-style-type: none"> - They are on the edge of an employment precinct, or are a stand-alone site, so as not to break up designated employment precincts, and - Allocation of the site could deliver improved or better functioning employment space through development which co-locates employment space with other uses 	The evidence base for the Local Plan demonstrates the need for retention of industrial floorspace and land given the low overall level of supply in the Borough and forecast increasing need across the plan period.

Site boundaries

- 4.15 For each site not excluded as unsuitable or unavailable, a review of the surrounding land parcels was undertaken. Multiple candidates for allocation were amalgamated into a single designated site, and adjoining parcels were also added, in cases where site amalgamation (or failing that a consolidated design approach) would better optimize overall site outcomes and capacity, or would lead to development proceeding in a more rational way.
- 4.16 The draft Local Plan site allocations policy (GR12):
- (a) Requires applicants to “demonstrate that all reasonable efforts have been made to assemble sites where adjacent properties would assist in site optimization and a more efficient use of land”
 - (b) Notes that “any development that would prejudice the optimal delivery of a site allocation, or frustrates the delivery of a neighbouring site, will be resisted”
- 4.17 As such, individual parts of a site allocation could be developed by themselves, but only where amalgamation has not been possible.

Stage 4: Detailed assessment (including site availability and deliverability)

Availability and deliverability assessment

- 4.18 An assessment of the availability of each not excluded in earlier stages was carried out, including the following:
- (a) Land ownership
 - (b) Whether pre-application discussions have occurred on the site or planning permission has been sought
 - (c) Planning permissions granted
 - (d) Existing leases on site
 - (e) Landowner intentions
 - (f) Site marketing, as identified in call for sites
- 4.19 Existing unimplemented allocations which were considered to be very unlikely to become available for development over the plan period were excluded. All new sites (i.e. not existing allocations) were found to be sufficiently likely to become available for development, and so none were excluded from allocation at this stage.
- 4.20 Following the availability and deliverability assessment, delivery timescales for each site were estimated taking account of likely site availability development timeframes.

- 4.21 Each site selected for allocation was subject to more detailed assessments through local plan evidence base studies and the documents supporting the Local Plan process, including:
- (a) Screening and if appropriate assessment through level 2 strategic flood risk assessment, including Sequential and Exceptions Tests.
 - (b) Consideration of viability through local plan viability assessment (typology approach used rather than individual site assessment)
 - (c) Identification of any major infrastructure constraints impacting on each site through the infrastructure delivery plan
 - (d) Assessment of sites through the integrated impact assessment process running parallel to the preparation of the Local Plan.
- 4.22 No further sites needed to be excluded because of these evidence base studies, but where relevant the results were reflected in the content of site allocations.

Stage 5: Site capacity

- 4.23 Development capacity on each site was established using a design-led capacity approach in line with London Plan Policies D1, D2 and D3. As part of this approach, a hierarchy of sources were used to develop potential residential capacities:
- (a) The permitted quantum of housing on relevant sites where existing schemes are permitted and likely to be delivered on that basis,
 - (b) An uplift on sites with planning permission where reworking of existing schemes is likely to occur based on stated landowner intentions,
 - (c) A design-based capacity study establishing potential building massing on other sites in line with London Plan policies D1, D2 and D3
- 4.24 For sites where design-led capacities have been used, a further uplift of 10% has been applied to resulting residential capacities to provide a figure for use in the housing trajectory. This is intended to reflect the outcome of development management processes which typically result in an uplift from expected site capacities through negotiation and further optimization of site capacities by proponents as part of a detailed design process. Evidence for the reasonableness of this assumption is provided in Appendix A.

Number of sites

- 4.25 The process detailed above has resulted in 41 sites being proposed for allocation in the draft Local Plan. A detailed list of sites excluded and included is provided in Chapter 5 below, while this section provides a summary of the number of sites obtained from each source.

Call for sites

- 4.26 44 sites were submitted as part of the call for sites and informal call for sites processes. Of these:
- (a) Four were excluded at the initial sieve as being too small
 - (b) 12 were excluded at the site assessment stage, of which nine were in the Green Belt, one in Metropolitan Open Land, one in designated open space and one in employment use (and not meeting the criteria for inclusion).
- 4.27 The remaining sites were carried forward and form part of the proposed allocations, although some were amalgamated with other submitted sites or existing site allocations.

Existing site allocations

- 4.28 There were 62 site allocations under the former development plan, including 22 in the Harrow and Wealdstone Area Action Plan and 40 under the Site Allocations Local Plan. Of these:
- (a) Two sites were excluded as part of the initial sieve because they were too small;
 - (b) 27 sites were fully excluded as part of the initial sieve because they had been delivered or largely delivered;
 - (c) Parts of 4 sites were excluded where these parts had been delivered; and
 - (d) 10 sites were excluded because they were highly unlikely to be available for development or to be able to be delivered.
- 4.29 The remaining allocations were reviewed and retained, with some being amalgamated with each other or with submitted sites.

Other sources

- 4.30 In addition to sites submitted in call for sites or forming part of existing site allocations:
- (a) Two sites (Peel Road and Grange Farm) were identified as major Council development or estate renewal projects;
 - (b) Two sites (Debenhams Harrow and Waitrose South Harrow) were identified for inclusion as part of Council's site review; and
 - (c) One site (Bretheren's Meeting Hall, The Ridgeway) was identified as a planned infrastructure project.

5. Lists of sites

Table 2: Sites excluded in the initial sieve

Site	Site source	Reason excluded
Letchford House, Headstone Lane	Call for Sites	Site too small (0.15ha) and low likely yield (6 housing units)
Unit 2 Phoenix Works, Cornwall Road	Call for sites	Site area too small (0.03 ha) and low yield (change of use, no net increase in floorspace)
10 The Avenue Hatch End	Call for sites	Site area too small (0.09 ha) and low yield (only 9 units)
Sherwood House, South Harrow	Call for Sites	Site area too small (0.04 ha) and yield likely to be below 10 units following urban design analysis
H2 - 205-209 Northolt Road	Existing allocation	Site area too small (0.03 ha) and yield likely to be below 10 units following urban design analysis
H19 – 16-24 Lowlands Road, Harrow	Existing allocation	Site too small (0.07 ha) and permission granted in 2019 for redevelopment to yield 9 units
AAP02 – Kodak (part) Zoom Leisure portion of site	Existing allocation	Development complete
AAP03 – Teachers Centre, Tudor Road	Existing allocation	Development complete
AAP04 – ColArt, Whitefriars Drive	Existing allocation	Development complete
AAP01 - Headstone Manor	Existing allocation	Restoration works largely complete or underway
AAP05 – Wealdstone Infills (parts listed below) Former Sam Maguires PH 19 High Street 16-24 Canning Road Former Case is Altered PH	Existing allocation	Development of these parcels complete The other parcel in AAP05 is the Harrow & Wealdstone Station Carpark, which has been retained as a new allocation (Carpark Ellen Webb Drive)
AAP06 – Palmerston Road / George Gange Way (parts listed below) Culvert House and Folk House	Existing allocation	Development complete
AAP08 – Civic Amenity and Council Depot, Forward Drive	Existing allocation	Development complete
AAP12 – Greenhill Way Car Park North	Existing allocation	Development complete
AAP14 – Bradstowe House, Headstone Road	Existing allocation	Development complete
AAP17 – 19 to 51 College Road 51 College Road	Existing allocation	Development complete on 51 College Road (now known as Perceval Square), which constitutes most of the original site. The remaining part of the allocation has been retained

Site	Site source	Reason excluded
AAP19 – Lowlands Recreation Ground	Existing allocation	Development complete
AAP21 – Lyon Road, Equitable House and Lyon House	Existing allocation	Development complete
AAP22 – Gayton Road, Car Park, former Gayton Library & Sonia Court	Existing allocation	Development complete
H1 – 1-5 Sudbury Hill Harrow	Existing allocation	Development complete
H3 – 1 & 1A Silverdale Close, Northolt	Existing allocation	Development complete
H4 – Former Matrix PH, 219 Alexandra Avenue, South Harrow	Existing allocation	Development complete
H5 – Former Rayners Hotel, 23 Village Way East, Rayners Lane	Existing allocation	Development complete
H7 – Enterprise House, 297 Pinner Road, North Harrow	Existing allocation	Development complete
H8 – Rear of 57-76 Bridge Street, Pinner	Existing allocation	Development complete
H9 – Jubilee House, Merrion Avenue, Stanmore	Existing allocation	Development complete
H11 – Paxfold, Elizabeth Gardens, Stanmore	Existing allocation	Development complete
H14 – Edgeware Town Football Club, Burnt Oak Broadway, Edgeware	Existing allocation	Development complete
H15 – Hill's Yard, Bacon Lane, Edgeware	Existing allocation	Development complete
H16 – 19 Buckingham Road, Edgeware	Existing allocation	Development complete
H18 – Former Tyneholme Nursery, Headstone Drive, Wealdstone	Existing allocation	Development complete
GB2 – Harrow College, Brookshill, Harrow Weald	Existing allocation	Development largely complete, and there appears to be little prospect of any other anticipated development occurring
MOS5 – Prince Edward Playing Fields, Whitchurch Lane / Camrose Avenue	Existing allocation	Development complete
MOS6 – Whitchurch Playing Fields, Wemborough Road, Belmont	Existing allocation	Development complete
G03 – St George's Playing Field, Pinner View, North Harrow	Existing allocation	Development complete
G06 – Kenton Lane Farm, Kenton Lane, Belmont	Existing allocation	Development complete on most of site – outstanding permission for conversion of farmhouse and dairy courtyard buildings, but this is only a

Site	Site source	Reason excluded
		small part of the site and would yield only 5 dwellings.

Table 3: New sites (i.e. not existing allocations) excluded during site assessment

Site	Site source	Reason excluded
Old Milhillians Sports Ground and Adjoining Lane	Call for sites	Site in Green Belt
Harrow Garden Centre	Call for sites	Site in Green Belt
Land at Headstone Lane	Call for sites	Site in Green Belt
Pinnerwood Farm	Call for sites	Site in Green Belt
Copse Farm	Call for sites	Site in Green Belt
Stanmore and Edgware Golf Centre	Call for sites	Site in Green Belt
Old Redding Public House	Call for sites	Site in Green Belt
Land at Magpie Hall Road	Call for sites	Site in Green Belt
43 Glenleam Road Stanmore	Call for sites	Site in Green Belt
John Lyon School (Sudbury Playing Fields)	Call for sites	Site in Metropolitan Open Land
Old Lyonian Sports Ground	Call for sites	Site is designated open space
110-116 Greenford Road Sudbury Hill	Call for sites	Site in employment use and did not meet criteria for allocation

Table 4: Existing site allocations excluded during site assessment

Site	Reason excluded
AAP06 – Palmerston Road / George Gange Way (part) Land Adjacent 14 To 16, Masons Avenue, Harrow,	Development unlikely to come forward on this small remaining part of the allocation which is bisected by the George Gange Way Bridge. The two parcels combined also have an area of only 0.18ha.
AAP10 – High Road Opportunity Area	This allocation consists of a series of terraced houses on the east side of Station Road. Given the fragmented land ownership of this site, and no firm plan existing for its amalgamation or development, it cannot be considered to be available for development.
AAP15 – College Road West	Most of these sites have undergone upwards extensions or conversions via prior approvals to residential use. Further development above what has already occurred is limited by RAF Northolt Safeguarding requirements. As a result there is very little development capacity remaining in the original site allocation.
EM1 – Northolt Road Business Use Area (North and South) South Harrow	Many of the sites in this allocation have been developed or have undergone conversion (in some cases through prior approval) to residential use. Others, for example the South Harrow Police Station, are unlikely to be available for development. As a result only small and isolated parts of this site may be available, and development to accommodate additional employment (the original intention of the allocation) is highly unlikely.
EM2 – Rayners Lane Offices, Imperial Drive, Rayners Lane	Most of this site (Talbot Skyline and Broad House) have been converted to residential use, while development of a five-storey higher-education building is underway on the remaining portion (167 Imperial Drive). As such, the site is

Site	Reason excluded
	unlikely to be available for further development during the plan period.
H12 – Gillian House, Elms Road, Harrow Weald	This is a small site of only 0.25 ha and does not appear to be available for development.
MOS1 – Land at Brigade Close, Harrow on the Hill	These allocations were to allow public access to privately owned open space. There are no plans for facilitate this access and so there appears to be little prospect of these sites being delivered.
MOS2 – Harrow Weald Park, Brookshill, Harrow Weald	
MOS3 – Glenthorne, Common Road, Stanmore	
MOS4 – The Santway, Clamp Hill, Stanmore	

Table 5: Sites proposed for allocation

Site	Area (ha)	Source	Proposed use (leading land use)	Proposed use (supporting land use)	Indicative residential yield (C3 unless stated)	Notes
Queen's House Carpark	0.32	Call for sites	Residential	Town centre appropriate uses Reprovision of carpark spaces	129 (Design capacity) 142 (+10 %)	
Harrow on the Hill	1.10	Call for sites	Residential Rail and bus transportation hub	Appropriate town centre uses	363 (Design capacity) 399 (+10%)	
15-29 College Road	0.38	Unimplemented part of current allocation	Residential	Town centre uses Public realm	86 (Design capacity) 95 (+10%)	
Havelock Place	0.95	Unimplemented allocation	Residential Town centre uses	Public realm	294 (Design capacity) 323 (+10%)	A call for sites was submitted that fell within this area. The existing allocation was reviewed rather than separately allocating the submitted site.
Station Road East, Harrow	0.88	Call for sites (Part, x2)	Residential	Town centre uses	171 (Design capacity) 188 (+10%)	Two sites submitted in call for sites (Congress House and Iceland Harrow) were amalgamated into a single allocation and an adjoining parcel (Signal House) added)
Greenhill Way	1.84	Call for sites (part) Unimplemented allocation (part) Council site review (part)	Residential Town centre uses	NHS floorspace Community/civic uses Public house Car parking	371 (Design capacity) 408 (+10%)	A site was submitted in call for sites at New Look Harrow. This was amalgamated with the existing Greenhill Way Carpark South allocation, and the adjacent Debenhams site (identified through Council site review) added.
Tesco Station Road	2.28	Call for sites & unimplemented allocation	Supermarket Residential		500 (10% uplift not applied)	

Site	Area (ha)	Source	Proposed use (leading land use)	Proposed use (supporting land use)	Indicative residential yield (C3 unless stated)	Notes
Former Royal Mail Sorting Office, Elmgrove Road	0.3	Call for sites	Industrial Residential		18 (Design capacity) 20 (+10%)	
Poet's Corner & Milton Road	4.46	Council (HSDP) site	Residential	Retail NHS floorspace Community floorspace	1,139 (10% uplift not applied)	
Wealdstone Parole Office	0.17	Council site submitted in call for sites	Hostel accommodation Replacement employment (industrial or related) use		18 (Design capacity C3 equivalent) 20 (+10%)	
Carpark Ellen Webb Drive	0.32	Call for sites & Existing unimplemented allocation	Residential Hotel	Appropriate town centre uses	183 (Design capacity) 201 (+10%)	This site was submitted in the call for sites, and is also part of an existing allocation.
Peel Road	0.51	Council (HSDP) site	Residential	Car parking	207 (Design capacity) 228 (+10%)	
Travis Perkins Wealdstone	0.43	Existing unimplemented allocation (part) Call for sites (part)	Industrial (or related)	Residential	18 (Design capacity) 20 (+10%)	A site was submitted through call for sites at 52-76 Palmerston Road. This was amalgamated with the existing allocation at Travis Perkins Wealdstone, and the adjoining unallocated part of Travis Perkins added to the site to assist in achieving a reasonable industrial co-location scheme. Parcels at 70-76 Palmerston Road were not

Site	Area (ha)	Source	Proposed use (leading land use)	Proposed use (supporting land use)	Indicative residential yield (C3 unless stated)	Notes
						included in the allocation as they are suburban lots that fall outside of the Opportunity Area boundaries.
Byron Quarter	5.74	Council (HSDP) site	Residential	Leisure and community uses Car parking NHS floorspace	683 (Design capacity) 702 (+10%)	
Iceland Wealdstone	0.22	Call for sites	Residential	Retail	25 (Design capacity) 28 (+10%)	
Kodak	15.00	Existing ongoing allocation	Residential	Industrial & employment Retail F1 class uses	2,675 (10% uplift not applied)	
Former Kodak Administration Offices	0.47	Call for sites	Flexible employment space Residential		120 (Design capacity) 132 (+10%)	
Royal National Orthopaedic Hospital	41.13	Existing partially implemented allocation	Hospital facility Research & innovation institutions (connected to hospital facility) Green belt	Residential	500 (10% uplift not applied)	
Watling Farm	1.06	Existing ongoing allocation	Gypsy & traveller pitches		12-13 additional pitches	
Waitrose South Harrow	1.57	Major supermarket site	Supermarket	Residential NHS floorspace	124 (Design capacity) 136 (+10%)	

Site	Area (ha)	Source	Proposed use (leading land use)	Proposed use (supporting land use)	Indicative residential yield (C3 unless stated)	Notes
Roxeth Library & Clinic	0.13	Existing unimplemented allocation	Community uses Town centre uses NHS floorspace	Residential	15 (Design capacity) 17 (+10%)	
Northolt Road Nursery and Carpark at rear of 27 Northolt Road	0.30	Council site submitted in call for sites	Residential	Nursery Office	37 (Design capacity) 41 (+10%)	
Grange Farm	4.08	Council estate renewal site	Residential	Community hub Open space	300 (10% uplift not applied)	
Harrow School Estate & John Lyon School		Existing allocation & submitted in call for sites	Refurbishment / redevelopment of school buildings, sports facilities and enhancement of playing fields		N/A	
Bretherens Meeting Hall, The Ridgeway	1.39	Infrastructure development site	School	Uses on remaining part of site as appropriate	N/A	
Rayners Lane Station Carpark	0.85	Call for sites & Existing unimplemented allocations (x2)	Residential Car parking	Town centre uses (eastern part of site only)	69 (Design capacity) 76 (+10%)	Call for sites submitted for carpark, which is also an existing allocation. This was amalgamated with an adjoining unimplemented allocation (Rayners Lane / Alexandra Avenue frontage)
Harrow West Conservative Association	0.16	Existing unimplemented allocation	Community or employment space Residential		13 (Design capacity) 14 (+10%)	
Pinner Telephone Exchange	0.51	Call for sites	Residential		44 (Design capacity) 48 (+10%)	

Site	Area (ha)	Source	Proposed use (leading land use)	Proposed use (supporting land use)	Indicative residential yield (C3 unless stated)	Notes
Harrow View Telephone Exchange	0.28	Call for sites	Residential		27 (Design capacity) 30 (+10%)	
North Harrow Methodist Church	0.34	Existing unimplemented allocation	Church & community facilities	Residential Limited level of retail use appropriate for an edge of centre location	33 (Design capacity) 36 (+10%)	
Hatch End Telephone Exchange	0.38	Call for sites	Residential	Appropriate town centre uses (within designated shopping frontage)	44 (Design capacity) 48 (+10%)	The northern portion of the site is owned by Council and was submitted in call for sites. This was amalgamated with the other parcels which comprise the telephone exchange.
Harrow Arts Centre	0.73	Existing partially implemented allocation	Arts centre and associated uses		N/A	
Vernon Lodge	0.36	Call for sites	Specialised older persons accommodation		56 C3 equivalent (10% uplift not applied)	
Belmont Clinic	0.37	Existing unimplemented allocation	Health care centre	Community or town centre uses Residential	N/A	
Travellers Rest, Kenton Road	0.69	Call for sites	Hotel Public house Residential	Town centre uses	109 (Design capacity) 120 (+10%)	The Travellers Rest (most of the site) was submitted through call for sites. This was amalgamated with an adjoining parcel between the Travellers Rest and the railway line, as otherwise it would become a small and isolated parcel between

Site	Area (ha)	Source	Proposed use (leading land use)	Proposed use (supporting land use)	Indicative residential yield (C3 unless stated)	Notes
						the developed site and the railway line.
Kenton Road Telephone Exchange	0.08	Call for sites	Residential	Town centre uses Community uses	12 (Design capacity) 13 (+10%)	
Wolstenholme	0.25	Existing unimplemented allocation	Specialist older persons housing		Net 25 C2 units 28 (+10%)	
Marsh Lane Gas Holders	0.88	Call for sites	Residential		70 (Design capacity) 77 (+10%)	The call for sites submission on this site was for a supermarket, but the site was assessed as not suitable for this use as it is out of centre. It was assessed as suitable for residential.
Canons Park Station Carpark	0.43	Call for sites & existing unimplemented allocation	Residential Car parking		26 (Design capacity) 29 (+10%)	
Anmer Lodge	1.37	Existing unimplemented allocation (part)	Residential	Town centre uses Carparking	141 (Design capacity) (10% uplift not applied)	Most of this site was an existing allocation. This was amalgamated with an adjoining parcel which is a carpark which has previously received planning permission for redevelopment. This site is required to deliver convenience retailing space to meet part of an unmet local need identified in the <i>Harrow Town Centres Economic Needs Study 2024</i>

Site	Area (ha)	Source	Proposed use (leading land use)	Proposed use (supporting land use)	Indicative residential yield (C3 unless stated)	Notes
Stanmore Station Carpark	1.39	Call for sites & existing unimplemented allocation	Residential	Car parking	183 (Design capacity) 199 (+10%)	

Appendix A – Development density evidence

Uplift through Development Management process

Table A1 below shows the difference between the number of housing units allocated in sites under the current local plan, and the number of units that has been delivered, or which have been approved on sites which are only partly complete or where planning permission has been received but development not started. Only those sites with planning permission or where development has commenced are included in this analysis.

Row B shows the total number of housing units allocated. However, on some sites only a portion (for example 50%) of parcels within the allocated site have been delivered. In this case only a portion of the allocated housing capacity would be expected to be delivered. To reflect this, row C shows this discounted expected number of housing units based on only the portions of each allocated site that have been approved or delivered, making the assumption that if, for example, 50% of the parcels by land area have been delivered, 50% of the housing capacity would be expected (and similarly for other percentages).

This creates two different uplift results:

- (a) Row E shows the uplift between total housing capacity on each site and the units that have been delivered or approved. In cases where only a portion of the allocated site has been approved or delivered, this is likely to be an underestimate of the uplift.
- (b) Row F shows the uplift between the expected housing delivery (i.e. discounted based on the portion of the allocated area approved or delivered) and the number of units approved or delivered. In cases where the part of the site which has come forward has a higher housing capacity than other parts of the site, this may be an overestimate of the uplift.

Given that row E is likely to be an underestimate of the true uplift, and row F may be an overestimate, the true uplift result is likely to lie between the two, although the uplift result in row F is likely to be a more accurate reflection of the housing uplift than that in row E.

Table A1

	Kodak	Other OA	Outside OA - Employment sites	Outside OA - RNOH	Outside OA - Other sites
Number of allocations (A)	1	8	2	1	12
Total units in allocations (B)	985	1,409	300	127	568
Units expected on portion of each site developed (C)	985	1,114	161	127	568
Units delivered / approved (D)	3,150	1,598	430	356	764

	Kodak	Other OA	Outside OA - Employment sites	Outside OA - RNOH	Outside OA - Other sites
% uplift on total allocated units (E = D / B)	220%	13%	43%	180%	35%
% uplift on fractions of sites delivered (F = D / C)	220%	44%	167%	180%	35%

In all cases, these results show that there has been a substantial uplift between the allocated housing capacity and the ultimate number of units that come forward through the development management process. This uplift is likely to be well above 10%, and in most cases has been 35% or more. It is worth noting that even in many cases where there was a planning permission on a site which formed the basis for a site allocation, an uplift was achieved to the final number of units delivered.

Comparison of proposed allocations with realised development

The above analysis focuses on existing allocations, the housing capacities for which were based on a density matrix approach, apart from cases where there was a planning permission on an allocated site in which case the number of units in the planning permission was used. This is different to the design-led capacity approach that has been used to calculate capacities in the proposed allocations of the Draft Local Plan. This design-led approach reflects a more detailed urban design analysis of the context and layout of each site, and so may generate higher and more accurate capacity estimates than the previously used density-matrix approach.

Starting from a higher capacity estimate means there would be less room for site uplift than expressed in the results above. As such, an additional analysis has been carried out (Table A2 below) to reflect potential uplifts above the design-based capacity estimates. This analysis compares the housing densities that the design-based capacities would achieve with housing densities that have been delivered across the Borough in recent years.

Column A of the following table shows the average density¹ that results from the modelled capacities in proposed allocations, broken down by broad locational categories. This is compared to the average housing density that has been delivered² between 2013-2024 in the same categories. Column C shows the percentage uplift between the two.

¹ Total housing yield across all sites divided by the sum of total site areas

² Similarly to the average calculation used for column A, total housing units delivered divided by the sum of all site areas

A weighted average of the uplift has been shown in order to provide a Borough-wide average. This is the average the uplift for each category weighted by the percentage of proposed allocated housing capacity in that category³. This is the total uplift that would be expected if the all allocated sites were delivered and uplifts achieved in line with column C and the categories shown below.

Table A2

Category	Average density in proposed allocations (A) (units/ha)	Average delivered housing density (B) (units/ha)	Potential uplift (C = B / A)
Harrow Town Centre	255	353	39%
Wealdstone Town Centre	285	298	4%
Other Opportunity Area	188	193	3%
Other district and major centres & PTAL 3+	104	141	36%
Other sites	101	74	-27%
Weighted average			24%

Based on this analysis, the densities that have been estimated through urban design analysis, and that reflect the indicative residential capacities of the proposed allocations, are systematically lower than densities that have been achieved in development across the Borough over the last 10 years. This means there may be room for site proponents to optimise designs to achieve higher yields than have been estimated. The uplift is highest in the Harrow Town Centre and in district and major centres and highly accessible locations outside of the Opportunity Area, and lower elsewhere. This is a reflection of the variability in outcomes across different sites.

Discussion

Both analyses have shown that uplifts are likely to be possible through DM processes and design optimisation, exceeding the indicative residential capacities which have been used in the proposed site allocations. The first analysis suggests uplifts of at least 13% and generally 35% or more, although the results are not fully comparable to currently proposed indicative capacities due to a change in the capacity calculation methodology. The second analysis suggests some variability across the Borough and between sites, but that the capacity estimates calculated have housing densities on average around 24% below what has been achieved in development in recent years.

In either case, an assumption of a 10% uplift above modelled capacities is below what analysis of recent development indicates could be possible. Given site specific sites and the variability in site outcomes, a 10% uplift is therefore to be reasonable and conservative assumption.

³ For example, if 60% of proposed housing capacity were in Harrow Town Centre and 40% in Wealdstone Town Centre (these are illustrative percentages only and not real data), the weighted average would be 60% of the uplift for Harrow Town Centre plus 40% of the uplift for Wealdstone Town Centre.

This uplift is intended to reflect *broadly* and at an average level the potential outcomes of design optimisation and the DM process. The actual uplift that could be achieved is likely to vary from site to site, with some sites achieving higher densities while some may achieve below the indicative residential capacity. As a result, the uplift has been applied only to the housing trajectory, and it is not considered reasonable to make the uplift overly specific in different parts of the Borough (for example in line with the analytical results above).

Appendix B – Comparative site suitability analysis

As well as a full assessment of the suitability of each site for development, an assessment was carried out which comparatively ranks sites on a wide range of suitability criteria. This is intended to identify and illustrate the relative suitability of sites with respect to several key planning issues. It is not intended to provide a more comprehensive and balanced view as to site suitability on a site-by-site basis, or to prejudge which sites should or should not be allocated.

A series of criteria have been identified split into positive (i.e. criteria which make sites more suitable for development/redevelopment) and negative (i.e. criteria which pose site constraints and/or make sites less likely to be suitable for development). In each case potential effects on suitability have been identified on a simple scale:

Score	Description
+1	Site meets positive criteria Positive effect on suitability
+0.5	Site partly meets positive criteria Smaller positive effect on suitability
0	Neither positive not negative effect on suitability
-0.5	Site partly meets negative criteria Smaller negative effect on suitability
-1	Site strongly meets negative criteria Strong negative effect on suitability

In many cases the criteria cover issues also considered in the integrated impact assessment for sites proposed to be allocated. In these cases, the criteria have been aligned with the integrated impact assessment criteria. However, the integrated impact assessment uses a more comprehensive range of criteria, while this comparative analysis is intended to focus on a selected set of issues covering key issues of alignment with the draft spatial strategy and potential impacts of development.

Positive criteria

Opportunity area

The spatial strategy in the Draft Local Plan (informed by the London Plan) identifies the Harrow & Wealdstone Opportunity Area as the most appropriate place for additional development and higher density. In addition, the Tall Buildings Study and draft policy identify the Opportunity Area as the only place in the Borough where tall buildings area appropriate. As a result, the Harrow & Wealdstone Opportunity Area is regarded as a sequentially preferable place for housing development to other parts of the Borough.

Criteria: Site in opportunity area

Score	Description
+1	Site is in the Harrow & Wealdstone Opportunity Area
0	Site is not in the Harrow & Wealdstone Opportunity Area

Centres

The London Plan highlights sites within Town Centres or at the edge of centres as particularly appropriate locations for brownfield development (Policy GG2) and says the vitality and viability of centres should be promoted through mixed-use or housing-led intensification (Policy SD6).

The draft Local Plan says centres will accommodate development opportunities commensurate to their character, role and function. Mixed use development can activate centres at different times of the day and night and support local business. While development within centres would need to not detract from providing employment, retail and other town centre uses, this risk can be handled through policy requirements, allocation uses and development management.

Criteria: Site in centre

Score	Description
+1	Site is within designated centre boundaries, and development would not lead to loss of a major employment or town centre use
+0.5	Site is within 300m of a designated centre boundary, and development would not lead to the loss of a major employment or town centre use
0	Site is not in a centre

Public transport accessibility

The NPPF and London Plan note the need for development to support sustainable transport, including through being focused in locations which are highly accessible to public transport.

Public transport accessibility in London is commonly measured using Public Transport Accessibility Levels (PTAL). London Plan policies H1 and H2 say that housing development should be focused within PTAL 3-6 or within 800m of a train station, and the draft Local Plan specifies that several types of higher-density housing development should be on sites within PTAL 3-6.

Areas in PTAL 4-6 are the most accessible within the London Borough of Harrow (although this designation covers a smaller portion of Harrow than it does of Inner London Boroughs). PTAL 2 covers large parts of the suburban portion of the Borough including the immediate surrounds of centres like Stanmore and Hatch End. PTAL 0-1 also covers a relatively large part of the Borough, but these places have relatively poor public transport accessibility and are generally less sustainable locations for significant development.

The London Plan specification of an 800m distance from train stations is generally implemented as an as-the-crow-flies distance. However, walking distances are a more accurate reflection of how people travel, although an 800m walking catchment is slightly smaller than an 800m as-the-crow-flies catchment. In order to create an accurate catchment area around train stations of a similar size to the 800m as-the-crow-flies catchment used in the London Plan, a 1,000m walking catchment has been used.

The criteria below have been created to reflect the different public transport accessibility policies while tailoring to these to a relative assessment across all of Harrow.

Criteria: Site is highly accessible to public transport

Score	Description
+1	PTAL 4-6
+0.5	PTAL 2-3 and within 1,000m walking distance of a train station
0	PTAL 0-1 and within 1,000m walking distance of train station Or PTAL 2-3 and not within 1,000m walking distance of train station
-1	PTAL 0-1 and outside of 1,000m walking distance from train station

Previously developed land

The NPPF and London Plan place substantial emphasis on brownfield land and previously developed land as the most appropriate locations for development.

Criteria: Site is previously development land

Score	Description
+1	Site is previously developed
0	Site is not previously developed

Key site types

London Plan Policy H1 instructs boroughs to optimise the potential for housing delivery on all sustainable and available brownfield sites, especially on several types of sites it notes. These include:

- (a) Sites with existing or planning PTAL 3-6 or within 800m of a station or town centre boundary
- (b) Mixed-use redevelopment of car parks and low-density retail parks and supermarkets
- (c) Housing intensification on other appropriate low-density sites in commercial, leisure or infrastructure use
- (d) The redevelopment of surplus utilities and public sector owned sites
- (e) Small sites
- (f) Industrial sites that have been identified as appropriate for industrial co-location through processes set out in Policy E4

The first part of this list is already covered in this assessment under public transport accessibility and centre accessibility, while Harrow’s draft policies address industrial co-location in line with the evidence base and limited industrial land supply. The remainder of the list has been adapted into a set of key site types on which development could be encouraged reflecting local circumstances, shown in the criterion below.

Criteria: Site is one of a key type encouraged for development by the London Plan

Score	Description
+1	Site belongs to one of the following types: <ul style="list-style-type: none"> - Low density supermarkets or retail parks, particularly with surface level carparks - Other carparks where not required for local accessibility or where appropriate levels of parking can be retained or reprovided - Low density leisure or commercial uses - Surplus or former utility sites - Redevelopment of surplus Council land - Estate redevelopment
0	Site does not fall into these categories

Accessibility

The most sustainable locations for development are those that are near a wide range of services and social infrastructure (as well as public transportation which is addressed above). There are a range of services and uses that could be captured in an analysis of the most accessible locations. Some of the most commonly considered, and those which have been used here, are:

- (a) Town centres, which commonly provide a range of retail and other services
- (b) Primary schools (noting that people commonly travel further to secondary schools and so proximity to them is less important and they have not been included)
- (c) GP surgeries
- (d) Open space

Other destinations like libraries, leisure centres and other health services are likely to be used less frequently or not at all by parts of the community, and so have not been included in this analysis.

For each land use included, primary and secondary catchment areas have been defined for the purpose of analysis relative accessibility. These are captured in the criteria below.

Criteria: Site is highly accessible to a district or metropolitan centre

Score	Description
+1	Site is within 800m walking distance of a centre boundary or is within a centre
+0.5	Site is within 1,200m walking distance of a centre boundary
0	Site is more than 1,200m from a centre boundary

Criteria: Site is highly accessible to a primary school

Score	Description
+1	Site is within 800m walking distance of a primary school
+0.5	Site is within 1,200m walking distance of a primary school
0	Site is more than 1,200m from a primary school

Criteria: Site is highly GP surgery

Score	Description
+1	Site is within 800m walking distance of a GP surgery
+0.5	Site is within 1,200m walking distance of a GP surgery
0	Site is more than 1,200m from a GP surgery

The London Plan sets out open space accessibility criteria including:

- (a) Local parks and open spaces should be within 400m of homes
- (b) District parks should be within 1.2km of homes

Within Harrow these criteria (in particular the 400m criterion) place very large parts of the Borough outside of desired open space accessibility levels, and so are not highly useful for a relative analysis of accessibility. This reflects the lower density of land use, and so lower potential provision of local open space, compared to other parts of London. The London Plan does allow boroughs to use other standards reflecting of local circumstances. Reflecting Harrow's circumstances, the Harrow PPG17 study (the most recent study to consider open space accessibility) applies a different set of criteria:

- (a) Parks and gardens should be within 400m of homes
- (b) Larger parks and gardens of at least 1ha should be within 800m of homes
- (c) District parks and gardens should be within 1.2km of homes.

An accessibility analysis has been carried out for each of these catchment distances and then the results averaged as specified below:

Criteria: Site is within an acceptable walking distance of open space

Score	Description
+1	Site meets all three open space accessibility criteria
+2/3	Site meets 2/3 open space accessibility criteria
+1/3	Site meets 1/3 open space accessibility criteria
+0	Site meets none of the open space accessibility criteria

Negative criteria

Green Belt

The London Plan, draft Local Plan and NPPF all protect the Green Belt from encroachment or inappropriate development, making it a generally unsuitable location for development apart from Green Belt uses.

Criteria: Site is within Green Belt

Score	Description
0	Site is not within Green Belt
-1	Site is within Green Belt

Metropolitan Open Land

The London Plan affords the same protections to Metropolitan Open Land as to the Green Belt, meaning that it is an unsuitable location for most development.

Criteria: Site is within Metropolitan Open Land

Score	Description
0	Site is not within Metropolitan Open Land
-1	Site is within Metropolitan Open Land

Open space

The Local Plan protects designated open space from inappropriate development, reflecting the need for open space to break up the urban fabric and to provide a range of amenities.

Criteria: Site is designated open space

Score	Description
0	Site is not designated open space
-1	Site is designated open space

Industrial uses and designations

Sites designated as strategic industrial land (SIL) and locally significant industrial sites (LSIS) are protected by the London Plan and the draft Local Plan, and are generally unsuitable for non-industrial development. Harrow's evidence base establishes an increasing need for industrial floorspace in the Borough while there is a very limited supply of land available, making it important to safeguard industrial uses and industrial land, particularly but not limited to designated land.

Criteria: Site is protected industrial land or has protected industrial use

Score	Description
0	Site is not designated for industrial use and does not contain industrial uses
-0.5	Site contains non-designated industrial uses
-1	Site is SIL or LSIS

Flooding

Sites with large areas of flood-prone land are less suitable for development. Depending on their floodzone and proposed land use, they may need to pass the sequential and/or exception test before development can occur, and in some cases development cannot occur.

Criteria: Site is flood-prone in a way that constrains or precludes development

Score	Description
0	Site is in floodzone 1 or 2, or has a very small area (<5%) in floodzone 3a/b on the fringe of the site
-0.5	Site contains moderate (<30%) of floodzone 3a, or minor areas (<10%) of floodzone 3b
-1	Site contains large areas under floodzone 3a/3b which could have serious impacts on development potential

Ecological impacts

Development needs to minimise impacts on sites of importance for nature conservation (SINCs) and protected trees, making sites near or containing these ecological assets less suitable for development.

Criteria: Site has potential for significant ecological impacts

Score	Description
0	Site does not contain and is unlikely to have impacts on SINCs or protected trees
-0.5	Site borders SINC(s)
-1	Site contains SINC(s) or multiple protected trees

Heritage

Sites where development is more likely to impact on heritage items or precincts are less suitable for development, with the impact on suitability dependent on the significant of the heritage asset and the level of potential impact. Sites with sufficiently large impacts or with impacts to a significant heritage item would be unsuitable for development.

Detailed impacts and mitigation measures would be assessed at the planning application stage, and it is beyond the scope of this comparative exercise to consider these in depth. Rather a more straightforward assessment of proximity and high-level impact potential have been carried out.

Criteria: Site has potential for significant heritage impacts

Score	Description
0	Site does not contain and is not within 50m of a heritage item
-0.25	Site does not contain but is within 50m of a heritage item
-0.5	Site contains a heritage item but development likely to be possible without significant impacts, or site borders a heritage conservation area
-1.0	Site is in heritage conservation area, or contains listed heritage item, and development would be likely to have significant heritage impacts.

Impacts on suburban character

Protecting Harrow's Metroland suburban character is a key part of the strategic policies, spatial strategy and vision of the draft Local Plan. As such, sites where development is highly inconsistent with the suburban character are less suitable for development.

Criteria: Site has potential to impact on Harrow's suburban character

Score	Description
0	Site is not in an area of suburban character, and does not adjoin back gardens of suburban properties
-0.25	Site intersects the back gardens of suburban dwellings (posing potential design constraints), but is predominately not in an area of suburban character
-0.5	Site is in an area with a partly suburban character, or in an area of predominately suburban character but this is unlikely to be compromised through proposed development
-1.0	Site is in an area of predominately suburban character which could be compromised through development, or development would be garden land development (this is specifically discouraged in the Local Plan)

Areas of special character

Areas of special character are designated places which are protected from inappropriate development, reflecting the significance of their character and setting to the borough as a whole. As a result, these locations are less suitable for development, which may be out of character.

Criteria: Site has potential to impact on character of an area of special character

Score	Description
0	Site is in area of special character
-1.0	Site is not in area of special character

Other criteria

Protected view corridors and tall building zones could be considered as additional criteria. As they only restrict or facilitate development above a given height and are not relevant to all, or even most, types of development, they have not been included.

Weighting and scoring

The results from each criteria were weighted and the resulting scores added to produce a single composite score for each site. This process is intended to provide a composite picture of the contribution of different factors to site suitability, but is not intended to be a final analysis of site suitability, which would require a consideration of planning balance on each site.

Alternative weightings would also be possible, and those used are intended to be an illustration of the composite picture of site suitability factors only.

In addition, this analysis cannot fully capture the degree to which these criteria and other criteria impact site suitability on a site-by-site basis. For example, it would be possible for a site to score well on a wide range of positive criteria and so generate a high overall score, but to be unsuitable for development as a result of very serious heritage or flooding impacts. A fuller picture of site suitability would be provided by site-by-site consideration of planning balance.

Table B1 - Criteria and weighting

Item	Weight	Notes
Positive criteria – i.e. those that make a site more suitable		
Opportunity Area	+1	+1 weighting applied to most positive criteria (not preferring some criteria over others)
Public Transport Accessibility	+1	
Previously developed land	+1	
Key site types	+1	
Centres	+0.5	+0.5 applied to each centre score to add up to +1 in total (avoiding double counting)
Accessibility - centres	+0.5	
Accessibility – open space	+0.75	Lower weights for accessibility than above factors as these criteria can change over time. Open space is the most permanent of these and has a high degree of importance.
Accessibility – primary school	+0.25	
Accessibility – GP surgeries	+0.25	
Negative criteria – i.e. constraints and factors that make a site less suitable		
Green Belt	-3	Contravention of these criteria could make a site inconsistent with the spatial strategy, justifying the highest negative weights
MOL	-3	
Industrial uses	-3	
Heritage	-2	Moderate policy contraventions compared to the draft strategic policies and spatial strategy, but may be able to be managed through design in some cases
Open space	-2	
Suburban character	-1	
Areas of special character	-1	
Ecological impacts	-1	Potential constraints which could impact on capacity and pose design constraints, but development may still be possible.
Heritage	-1	

Results

The results for the positive criteria are displayed in the table below. Cells showing the total positive score have been coloured to illustrate their values, with values above 75% dark green, 50% to 75% light green, 25% to 50% yellow and 0% to 25% red.

Table B2 – Results for positive criteria

Site		Opp. Area	Public Transport	Prev. dev.	Key site types	Centres	Access. centres	Access. Pri. school	Access open space	Access GP surgeri	Positive score
OA1	Queen's House Carpark	1	1	1	0	1	1	1	1	1	86%
OA2	Harrow on the Hill	1	1	1	1	1	1	1	1	1	100%
OA3	15-29 College Road	1	1	1	0	1	1	1	1	1	86%
OA4	Havelock Place	1	1	1	0	1	1	1	1	1	86%
OA5	Station Road East, Harrow	1	1	1	1	0	1	1	2/3	1	92%
OA6	Greenhill Way	1	1	1	1	1	1	1	1/3	1	98%
OA7	Tesco Station Road	1	1	1	1	1	1	1	2/3	1	99%
OA8	Former Royal Mail Sorting Office, Elmgrove Road	1	0.5	1	0	0	1	1	2/3	1	64%
OA9	Poet's Corner & Milton Road	1	1	1	1	0	1	1	1/3	1	91%
OA10	Wealdstone Parole Office	1	1	1	0.5	0	1	1	2/3	1	85%
OA11	Carpark Ellen Webb Drive	1	1	1	1	1	1	1	2/3	0.5	97%
OA12	Peel Road	1	1	1	1	1	1	1	1	0.5	98%
OA13	Travis Perkins Wealdstone	1	1	1	0	0.5	1	0.5	1	0.5	76%
OA14	Byron Quarter	1	0.5	1	1	0	1	1	1	0.5	78%
OA15	Iceland Wealdstone	1	1	1	0	1	1	1	2/3	1	85%
OA16	Kodak	1	0.5	1	0	0	1	1	1	1	66%
OA17	Former Kodak Administration Offices	1	0.5	1	0	0	1	1	2/3	0.5	63%
GB1	Royal National Orthopaedic Hospital	0	0	0.5*	1	0	0	0	0	0	21%

Site		Opp. Area	Public Transport	Prev. dev.	Key site types	Centres	Access. centres	Access. Pri. school	Access open space	Access GP surgeri	Positive score
GB2	Watling Farm	0	0	0	0	0	0	0	0	0	0%
O1	Waitrose South Harrow	0	0.5	1	1	0	1	1	2/3	1	64%
O2	Roxeth Library & Clinic	0	1	1	0.5	1	1	1	1	1	79%
O3	Northolt Road Nursery and Carpark at rear of 27 Northolt Road	0	1	1	0.5	0	1	1	0.5*	1	71%
O4	Grange Farm	0	0.75*	1	1	0	1	1	1/3	1	70%
O6	Bretherens Meeting Hall, The Ridgeway	0	0.25	1	0.5	0	0.5	1	2/3	1	47%
O7	Rayners Lane Station Carpark	0	1	1	1	1	1	1	1/3	1	84%
O8	Harrow West Conservative Association	0	1	1	0	0.5	1	1	1/3	1	67%
O9	Pinner Telephone Exchange	0	0	1	1	0	1	1	2/3	0.5	49%
O10	Harrow View Telephone Exchange	0	0	1	1	0	1	1	1	1	52%
O11	North Harrow Methodist Church	0	0.5	1	0	0.5	1	1	2/3	0.5	52%
O12	Hatch End Telephone Exchange	0	0.5	1	1	1	1	1	2/3	1	71%
O13	Harrow Arts Centre	0	0.5	1	0.5	0	1	1	1/3	1	56%
O14	Vernon Lodge	0	0	1	0	0	1	1	0	0.5	33%
O15	Belmont Clinic	0	0.25	1	0.5	1	1	1	1/3	1	56%
O16	Travellers Rest, Kenton Road	0	1	1	0	1	1	0.5	2/3	1	66%
O17	Kenton Road Telephone Exhcnage	0	0.5	1	1	0	1	0.5	2/3	0.5	57%
O18	Wolstenholme	0	0	1	0	0	1	1	1/3	1	36%

Site	Opp. Area	Public Transport	Prev. dev.	Key site types	Centres	Access. centres	Access. Pri. school	Access open space	Access GP surgeri	Positive score	
O19	Marsh Lane Gas Holders	0	0.5	1	1	0	0.5	1	2/3	0.5	59%
O20	Canons Park Station Carpark	0	0.5	1	1	0	0.5	0.5	1	0	53%
O21	Anmer Lodge	0	0.5	1	1	1	1	1	1	0.5	71%
O22	Stanmore Station Carpark	0	0.5	1	1	0	1	1	2/3	1	64%
Excluded sites											
	Old Milhillians Sports Ground and Adjoining Lane	0	0.25	0	0	0	0	1	0	1	21%
	Harrow Garden Centre	0	0.5	1	0.5	0	0	1	1/3	1	49%
	Land at Headstone Lane	0	0.25	0	0	0	0	1	2/3	1	23%
	Pinnerwood Farm	0	0	0	0	0	0.5	1	2/3	0.5	18%
	Copse Farm	0	0	0	0	0	0	0.5	0	0	5%
	Stanmore and Edgware Golf Centre	0	0	0.5*	0	0	0	0	0	0.5	9%
	Old Redding Public House	0	0	1	0	0	0	0	0	0	14%
	Land at Magpie Hall Road	0	0	0	0	0	0.5	1	0	0.5	16%
	43 Glenleam Road Stanmore	0	0.25	0	0	0	0.5	0.5	0	1	19%
	John Lyon School (Sudbury Playing Fields)	0	0.5	0	0	0	1	1	0	1	34%
	Old Lyonian Sports Ground	0	0.25	0	0	0	0.5	1	1	1	28%
	110-116 Greenford Road Sudbury Hill	0	0.5	1	0	0	1	1	1/3	1	49%

* An average between two different scores has been used due to differing results across different parts of the site

The results for the negative criteria are displayed in the table below. Cells showing the total negative score have been coloured to illustrate their values, with values -10% or above dark green, -25% to -10% light green, -50% to -25% yellow and below -50% red.

Table B3 – Results for negative criteria

Site		Green Belt	MOL	Industrial	Heritage	Open space	Suburban character	Areas of special	Ecological impacts	Flooding	Negative score
OA1	Queen's House Carpark	0	0	0	0	0	0	0	0	-0.5	-7%
OA2	Harrow on the Hill	0	0	0	-0.5	0	0	0	0	0	-14%
OA3	15-29 College Road	0	0	0	0	0	0	0	0	0	0%
OA4	Havelock Place	0	0	0	-0.5	0	0	0	0	0	-14%
OA5	Station Road East, Harrow	0	0	0	-0.25	0	0	0	0	0	-7%
OA6	Greenhill Way	0	0	0	-0.25	0	0	0	0	0	-7%
OA7	Tesco Station Road	0	0	0	-0.25	0	-0.25	0	0	0	-10%
OA8	Former Royal Mail Sorting Office, Elmgrove Road	0	0	-0.5	0	0	-0.25	0	0	0	-24%
OA9	Poet's Corner & Milton Road	0	0	0	0	0	-0.25	0	0	0	-3%
OA10	Wealdstone Parole Office	0	0	-1	-0.25	0	0	0	0	-0.5	-55%
OA11	Carpark Ellen Webb Drive	0	0	0	0	0	0	0	0	-0.5	-7%
OA12	Peel Road	0	0	0	0	0	0	0	0	0	0%
OA13	Travis Perkins Wealdstone	0	0	-1	0	0	-0.25	0	0	0	-45%
OA14	Byron Quarter	0	0	0	-0.5	0	-0.25	0	0	0	-17%
OA15	Iceland Wealdstone	0	0	0	-0.25	0	-0.5	0	0	-1	-28%
OA16	Kodak	0	0	0	-0.5	0	0	0	0	0	-14%
OA17	Former Kodak Administration Offices	0	0	-1	0	0	0	0	0	0	-41%
GB1	Royal National Orthopaedic Hospital	-1	0	0	-0.5	0	0	-1	-1	0	-83%
GB2	Watling Farm	-1	0	0	0	0	0	-1	-0.5	-0.5	-69%
O1	Waitrose South Harrow	0	0	0	0	0	-0.25	0	0	-0.5	-10%

Site		Green Belt	MOL	Industrial	Heritage	Open space	Suburban character	Areas of special	Ecological impacts	Flooding	Negative score
O2	Roxeth Library & Clinic	0	0	0	0	0	-0.5	0	0	0	-7%
O3	Northolt Road Nursery and Carpark at rear of 27 Northolt Road	0	0	0	0	0	0	0	0	-0.5	-7%
O4	Grange Farm	0	0	0	-0.25	0	-0.25	0	0	0	-10%
O6	Bretherens Meeting Hall, The Ridgeway	0	0	0	0	0	-0.5	0	-0.5	-0.5	-21%
O7	Rayners Lane Station Carpark	0	0	0	-0.5	0	-0.25	0	-0.5	0	-24%
O8	Harrow West Conservative Association	0	0	0	0	0	-0.5	0	0	-0.5	-14%
O9	Pinner Telephone Exchange	0	0	0	0	0	-0.5	0	-0.5	-0.5	-21%
O10	Harrow View Telephone Exchange	0	0	0	0	0	-0.5	0	0	0	-7%
O11	North Harrow Methodist Church	0	0	0	0	0	-0.5	0	0	-0.5	-14%
O12	Hatch End Telephone Exchange	0	0	0	0	0	-0.25	0	0	0	-3%
O13	Harrow Arts Centre	0	0	0	-0.25	0	-0.5	0	0	0	-14%
O14	Vernon Lodge	0	0	0	0	0	-0.5	0	0	-0.5	-14%
O15	Belmont Clinic	0	0	0	0	0	-0.25	0	-0.5	-0.5	-17%
O16	Travellers Rest, Kenton Road	0	0	0	0	0	-0.5	0	0	0	-7%
O17	Kenton Road Telephone Exhcnage	0	0	0	0	0	-0.5	0	0	0	-7%
O18	Wolstenholme	0	0	0	-0.5	0	-0.5	0	-0.5	0	-28%
O19	Marsh Lane Gas Holders	0	0	0	0	0	-0.25	0	-0.5	-0.5	-17%
O20	Canons Park Station Carpark	0	0	0	-0.5	0	-0.5	0	-0.5	0	-28%

Site		Green Belt	MOL	Industrial	Heritage	Open space	Suburban character	Areas of special	Ecological impacts	Flooding	Negative score
O21	Anmer Lodge	0	0	0	0	0	0	0	0	-0.5	-7%
O22	Stanmore Station Carpark	0	0	0	-0.25	0	-0.25	0	-0.5	0	-17%
Excluded sites											
	Old Milhillians Sports Ground and Adjoining Lane	-1	0	0	0	0	0	0	-1	0	-55%
	Harrow Garden Centre	-1	0	0	0	0	0	0	-0.5	0	-48%
	Land at Headstone Lane	-1	0	0	0	0	-0.5	0	-0.5	-0.5	-62%
	Pinnerwood Farm	-1	0	0	0	0	-0.5	0	0	0	-48%
	Copse Farm	-1	0	0	-1	0	0	-1	-1	0	-97%
	Stanmore and Edgware Golf Centre	-1	0	0	0	0	0	-1	-0.5	0	-62%
	Old Redding Public House	-1	0	0	-1	0	0	-1	-0.5	0	-90%
	Land at Magpie Hall Road	-1	0	0	0	0	-0.5	-1	-0.5	0	-69%
	43 Glenleam Road Stanmore	-1	0	0	0	0	-0.5	-1	-0.5	0	-69%
	John Lyon School (Sudbury Playing Fields)	0	-1	0	-0.25	0	-0.5	0	0	0	-55%
	Old Lyonian Sports Ground	0	0	0	0	-1	-0.5	0	0	0	-34%
	110-116 Greenford Road Sudbury Hill	0	0	-0.5	-0.25	0	-0.5	0	0	0	-34%

The following table shows the combined positive and negative scores for each site, along with the overall score (the sum of the two). Cells showing the positive and negative scores have been coloured as in the tables above. Cells showing the overall scores have been coloured to aid interpretation, with 70% and above dark green, 40% to 70% light green, 0% to 40% yellow and below 0% (i.e. negative values) red.

Table B4 – Combined results

Site		Positive score	Negative score	Overall score
OA1	Queen's House Carpark	86%	-7%	79%
OA2	Harrow on the Hill	100%	-14%	86%
OA3	15-29 College Road	86%	0%	86%
OA4	Havelock Place	86%	-14%	72%
OA5	Station Road East, Harrow	92%	-7%	85%
OA6	Greenhill Way	98%	-7%	91%
OA7	Tesco Station Road	99%	-10%	89%
OA8	Former Royal Mail Sorting Office, Elmgrove Road	64%	-24%	40%
OA9	Poet's Corner & Milton Road	91%	-3%	87%
OA10	Wealdstone Parole Office	85%	-55%	30%
OA11	Carpark Ellen Webb Drive	97%	-7%	90%
OA12	Peel Road	98%	0%	98%
OA13	Travis Perkins Wealdstone	76%	-45%	31%
OA14	Byron Quarter	78%	-17%	60%
OA15	Iceland Wealdstone	85%	-28%	57%
OA16	Kodak	66%	-14%	52%
OA17	Former Kodak Administration Offices	63%	-41%	21%
GB1	Royal National Orthopaedic Hospital	21%	-83%	-62%
GB2	Watling Farm	0%	-69%	-69%
O1	Waitrose South Harrow	64%	-10%	54%
O2	Roxeth Library & Clinic	79%	-7%	72%
O3	Northolt Road Nursery and Carpark at rear of 27 Northolt Road	71%	-7%	64%
O4	Grange Farm	70%	-10%	60%
O6	Bretherens Meeting Hall, The Ridgeway	47%	-21%	26%
O7	Rayners Lane Station Carpark	84%	-24%	60%
O8	Harrow West Conservative Association	67%	-14%	53%
O9	Pinner Telephone Exchange	49%	-21%	28%
O10	Harrow View Telephone Exchange	52%	-7%	45%
O11	North Harrow Methodist Church	52%	-14%	39%

Site		Positive score	Negative score	Overall score
O12	Hatch End Telephone Exchange	71%	-3%	68%
O13	Harrow Arts Centre	56%	-14%	43%
O14	Vernon Lodge	33%	-14%	19%
O15	Belmont Clinic	56%	-17%	39%
O16	Travellers Rest, Kenton Road	66%	-7%	59%
O17	Kenton Road Telephone Exchange	57%	-7%	51%
O18	Wolstenholme	36%	-28%	8%
O19	Marsh Lane Gas Holders	59%	-17%	42%
O20	Canons Park Station Carpark	53%	-28%	26%
O21	Anmer Lodge	71%	-7%	64%
O22	Stanmore Station Carpark	64%	-17%	47%
Excluded sites				
	Old Milhillians Sports Ground and Adjoining Lane	21%	-55%	-34%
	Harrow Garden Centre	49%	-48%	1%
	Land at Headstone Lane	23%	-62%	-39%
	Pinnerwood Farm	18%	-48%	-30%
	Copse Farm	5%	-97%	-91%
	Stanmore and Edgware Golf Centre	9%	-62%	-53%
	Old Redding Public House	14%	-90%	-76%
	Land at Magpie Hall Road	16%	-69%	-53%
	43 Glenleam Road Stanmore	19%	-69%	-50%
	John Lyon School (Sudbury Playing Fields)	34%	-55%	-21%
	Old Lyonian Sports Ground	28%	-34%	-7%
	110-116 Greenford Road Sudbury Hill	49%	-34%	15%

Notes on included sites / planning judgement

As noted above, this analysis is not intended to provide a comprehensive measure of suitability, and so for example a lower score does not automatically mean a site cannot be suitable. Despite this, it is worth noting that sites selected for allocation largely perform better in this analysis than sites excluded from the allocation process. Exceptions include:

- (a) Royal National Orthopaedic Hospital, which while located in the Green Belt has previously received outline planning permission which accepts the principle of proposed development. This permission accepted that very special circumstances exist as a result of the need to renew the hospital, and that impacts to the green belt could be partially offset by embellishment and public access to other areas.

- (b) Watling Farm, which is proposed to be allocated for Gypsy and Traveller Pitches. While this site performs poorly on a range of criteria, it is an existing site allocation (with more modest increase in pitch numbers based on evidence at the time) and is currently in use for Gypsy and Traveller pitches, and no other sites have come forward or been identified for this purpose despite the call for sites process being open to all uses.
- (c) Wolstenholme, which is an existing allocation and in use as sheltered housing for older people, and where there has been previous development interest. Allocation of this site contributed to the need to provide updated and additional housing for older people in the Borough. The potential impacts of development which impact on the score can be managed through design and have been reflected in the site allocation.

Several sites with industrial designations are proposed to be allocated despite their industrial allocation negatively affecting their overall score. As outline in the main part of this document, these sites were only proposed to be allocated on the basis that development could provide improved or better functioning employment space, mitigating the impacts to supply of industrial space that the industrial criterion captures.

Appendix C – Addendum – Sequential & Exceptions Tests

Introduction

The Rivers Pinn, Crane, Brent, and the Silk Stream run through the borough, and while defended, create a relatively small risk of fluvial flooding. The rivers have been an important driver of historic urban development, with many major sources of brownfield land being in close proximity, or adjacent. These areas are also well supported by flood defences which place them typically at a small level of increased risk from flooding.

The borough is highly urbanised, and a significant source of flood risk is from surface water run-off.

The borough has significant housing development needs, which must be accommodated in a sustainable way and in line with the requirements of the London Plan and NPPF 2023⁴. Available, developable land in turn is limited within the borough. The Site Selection Report indicates that meeting the housing requirement for the borough as set out in the London Plan 2021 is likely to mean that some development is required in medium-to-high risk flood zones. In line with the approach to flood risk in national policy, the following assessment considers whether potential development sites in the flood zones need to and can pass the sequential and, where relevant, the exception tests.

Background

This document demonstrates that draft allocated sites, as identified in the Site Selection Methodology Report, comply with the Sequential and where applicable, the Exceptions Test. The sites have been allocated to support meeting the borough's London Plan target, and the borough has the necessary infrastructure to support the anticipated level of growth set out in the borough's emerging Local Plan.

The West London SFRA (Level 1) forms the basis for the assessment. It follows the guidance set out in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance on assessing flood risk. The information in the Level 1 SFRA has been used to determine whether a potential development location can pass the Sequential and Exception Test as defined in the NPPF, demonstrating that any infrastructure critical to the delivery of the Local Plan has a reasonable prospect of delivery. This includes any necessary flood risk infrastructure to enable development to remain 'safe' in compliance with NPPF and the accompanying Planning Practice Guidance.

It should be noted that whilst this document sets out whether a site can pass the Exceptions Test in principle, in real terms the Exceptions Test can only be passed at the planning application stage where a suitable site specific flood risk assessment demonstrates that the development will be safe and not increase flood risk elsewhere. The Harrow SFRA Level 2 report sets out how flood risk can be managed on all draft allocation sites with flood risk on them.

Policy Background - National Policy

The definition of 'flood risk' is taken from the NPPG and refers to: *"a combination of the probability and the potential consequences of flooding. Areas at risk of flooding are those at risk of flooding from any source, now or in the future. Sources include rivers and the sea, direct rainfall on the ground surface, rising groundwater, overwhelmed sewers and drainage systems, reservoirs, canals and lakes*

⁴ It is intended that the draft Local Plan will be submitted for examination under the NPPF 2023, as allowed in *Annex 1: Implementation* of the NPPF 2024. All references to the NPPF in this addendum refer to the NPPF 2023.

and other artificial sources. Flood risk also accounts for the interactions between these different sources.’⁵

The Environment Agency (EA) provides mapping of flood risk arising from sea and river sources and is available at <https://flood-map-for-planning.service.gov.uk/>. This mapping does not take into account the presence of flood defences nor does it account for the potential impact of Climate Change, including sea-level rise and extreme weather events. Flood risk is mapped according to the probability of flooding which is expressed in three different flood zones as shown in Table 1 below:

Table 1 – Flood Zone Definitions	
FLOOD ZONE	DEFINITION
Zone 1 (Low Probability)	Land having less than 0.1% annual probability of river or sea flooding. (Shown as ‘clear’ on the Flood Map – all land outside Zones 2, 3a and 3b).
Zone 2 (Medium Probability)	Land having between a 1 and 0.1% annual probability of river flooding; or Land having between a 0.5% and 0.1% annual probability of sea flooding. (Land shown in light blue on the Flood Map).
Zone 3a* (High Probability)	Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea flooding. (Land shown in dark blue on the Flood Map).
Zone 3b* (The Functional Floodplain)	This zone comprises land where water has to flow or be stored in times of flood. (Not separately distinguished from Zone 3a on the Flood Map).

Proposed Allocations within Flood Zones 2 and 3 (a and b) must always address the requirements of the Sequential Test in line with the approach set out by government policy as elaborated in this paper.

Paragraph 24 of the National Planning Practice Guidance (NPPG) on Flood Risk and Coastal Change explains that the Sequential Test ensures that a sequential, risk based approach is followed to steer new development to areas with the lowest probability of flooding. The flood zones as defined in the Strategic Flood Risk Assessment (SFRA) Level 1 for the area provide the basis for applying the Test.

The aim is to steer new development to Flood Zone 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in Flood Zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2 (areas with a medium probability of river or sea flooding), applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

Table 2 categorises different types of uses & development according to their vulnerability to flood risk. Table 3 maps these vulnerability classes against the flood zones set out in Table 1 to indicate

⁵ Paragraph: 001 Reference ID: 7-001-20220825

where development is ‘appropriate’ and where it should not be permitted. These Flood Zones refer to the probability of river and sea flooding, ignoring the presence of defences. They are shown on the Environment Agency’s Flood Map for Planning (Rivers and Sea), available from the Environment Agency.

Table 2 Flood Risk Vulnerability Categorisation⁶
<p>Essential Infrastructure</p> <ul style="list-style-type: none"> • Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk. • Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood. • Wind turbines.
<p>Highly Vulnerable</p> <ul style="list-style-type: none"> • Police and ambulance stations; fire stations and command centres; telecommunications installations required to be operational during flooding. • Emergency dispersal points. • Basement dwellings. • Caravans, mobile homes and park homes intended for permanent residential use. • Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as ‘Essential Infrastructure’).
<p>More Vulnerable</p> <ul style="list-style-type: none"> • Hospitals • Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels. • Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels. • Non–residential uses for health services, nurseries and educational establishments. • Landfill^{7*} and sites used for waste management facilities for hazardous waste. • Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.

⁶ Source: NPPG Paragraph: 066 Reference ID: 7-066-20140306

⁷ Landfill is as defined in Schedule 10 of the Environmental Permitting (England and Wales) Regulations 2010

Table 2 Flood Risk Vulnerability Categorisation⁶

Less Vulnerable

- Police, ambulance and fire stations which are not required to be operational during flooding.
- Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'More Vulnerable' class; and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill* and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works, if adequate measures to control pollution and manage sewage during flooding events are in place.

Water-Compatible Development

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location. · Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan

Table 3 – Flood Zone Vulnerability Classification

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

The Sequential Test

The NPPF, specifically paragraphs 170-186 and Planning Practice Guidance (PPG) give guidance to Local Authorities on how the plan making process should take into account flood risk and coastal change. Paragraph 172 of the NPPF states that *“All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.”* Whilst Paragraph 174 states: *“The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.”*

This is built upon in the PPG, which requires inappropriate development in areas at risk of flooding (i.e. in flood zones 2 and 3 or land within flood zone 1 which has critical drainage problems) to be avoided by directing development away from areas at highest risk. Where development is necessary, it is required that it is made safe without increasing the risk of flooding elsewhere.

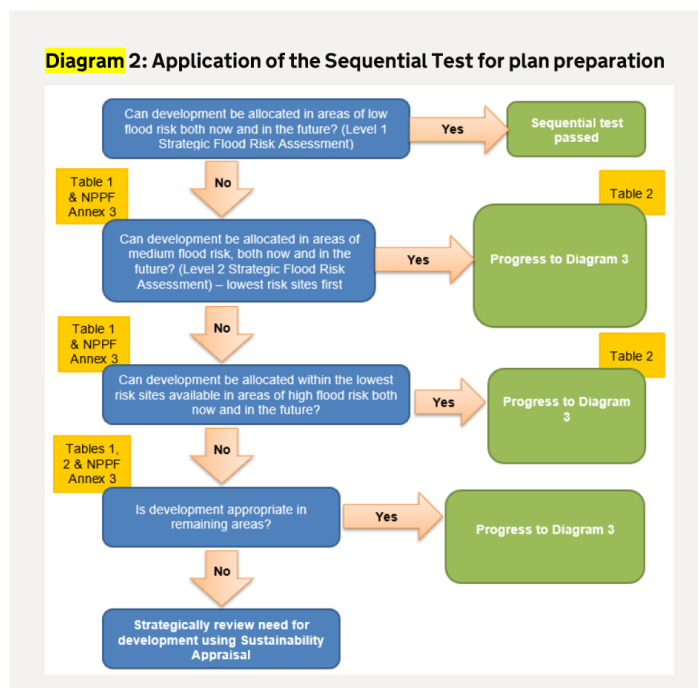
Within Harrow, the application of the sequential test means allocating vulnerable development, wherever possible, into flood zone 1 (areas with low probability of flooding). This requires that development can be located in flood zone 2 and then flood zone 3 only if there are no reasonably

available sites in flood zone 1. Within each flood zone, new development should also be directed to sites at the lowest probability of flooding from all sources.

A local planning authority allocating land for development must demonstrate that it has considered the range of possible options in conjunction with the flood zone information from the SFRA and vulnerability of development and has applied the sequential test, and where necessary the exception test, in the site allocation process.

It should also be demonstrated, through the sequential test, that reasonably available alternative sites have been tested for each site allocation within the Local Plan. A list of those sites considered to be 'Reasonably available' can be seen in the main report.

The process of applying the Sequential Test in the preparation of a Local Plan is illustrated in Diagram 2 below. Where it is considered that other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications for any decision to allocate land in areas at high flood risk.



Government guidance does not intend to prevent all development on sites liable to flooding, accepting that some form of development may have to take place there. The focus is instead on minimising risks to people and property. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

The Application of the Sequential Test in Harrow

The application of the Sequential Test to proposed allocated sites in Harrow is set out in Appendices 1-3. This considers all known available, potentially developable sites in the borough proposed for application following an open call-for-sites process undertaken as part of the Regulation 18 consultation on the draft Plan (February-April 2024). The conclusion of this process is that there is not sufficient land available to meet local development needs on sites in Flood Zone 1 alone. It shows:

- 8 sites are in flood zone 1 (Appendix 1);
- 14 sites have a low risk of surface water flooding (below 5% of the site area) (Appendix 2); and
- 18 sites trigger the need for a more detailed review to identify how the exceptions test can be met (Appendix 3).

The Exception Test

Paragraph 169 of the NPPF states that *“If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied”* with Paragraph 170 stating that *“The application of the exception test should be informed by a strategic or site-specific flood risk assessment”*.

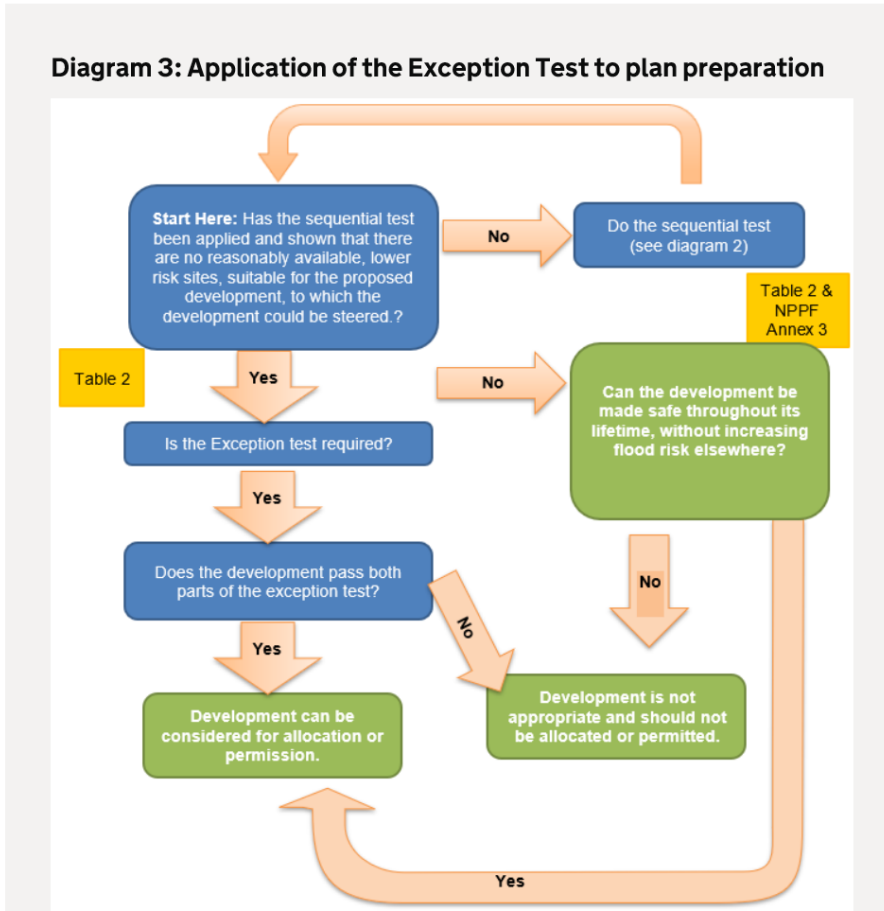
The test has two parts, both of which need to be satisfied for development to be allocated. The NPPF states, at Paragraph 170 that to pass the Exception Test it should be demonstrated that: *“a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.”*

To satisfy part one of the test, local planning authorities will need to consider what criteria they will use in this assessment, having regard to the objectives of their Local Plan, and provide advice which will enable applicants to provide the evidence to demonstrate this part of the Exception Test is passed.

If a site fails to score positively against the aims and objectives of the Local Plan, or other measures of sustainability, the local planning authority should consider whether the use of planning conditions and/or planning obligations could make it do so. Where this is not possible, the Exception Test has not been satisfied and development should not be allocated.

To satisfy part 2 (as detailed in Diagram 3, below) of the test, the proposed development needs to be demonstrated to be safe, and any residual flood risk can be overcome to the satisfaction of the local planning authority, taking account of any advice from the Environment Agency.

Diagram 3: Application of the Exception Test to plan preparation



At application stage the developer’s site-specific flood risk assessment should demonstrate that the site will be safe and that people will not be exposed to hazardous flooding from any source. The following should be covered by the flood risk assessment:

- the design of any flood defence infrastructure;
- access and egress;
- operation and maintenance;
- design of development to manage and reduce flood risk wherever possible;
- resident awareness;
- flood warning and evacuation procedures: and
- any funding arrangements necessary for implementing the measures.

Satisfying the Exception Test involves consideration of the reasons behind the selection of the site for development, as well as consideration in planning and design, such that the site will remain safe and operational in the event of flooding. This may involve demonstrating that:

- A sequential approach is taken to development site layout, such that within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

- Buildings are designed to be appropriately flood resilient and resistant, with essential services remaining functional in the event of flooding, and quick recovery following a flood;
- there is a safe means of access and egress during a flood event;
- Emergency evacuation procedures are developed, to be utilised following receipt of a flood warning;
- Priority is given to the use of sustainable drainage systems

The Application of the Exceptions Test in Harrow

Harrow is a heavily built up urban area, with a small proportion of the borough located within Flood Zone 3a as a result of residual, defended flood risk from rivers that cross the borough. On a small number of sites the requirements of the Exception Test are needed to be satisfied for 'more vulnerable' e.g. residential, development in this area.

In regards to the application of the Exceptions Test, the Harrow SFRA Level 2 includes a screening assessment to inform the sequential approach to the allocation of development with regards flood risk. This identifies that there are 14 sites with relatively low level of pluvial flood risk.

A low level of residual fluvial flood risk is defined as where the extent of Flood Zone 2, Flood Zone 3a (fluvial), Flood Zone 3b (fluvial) and / or the Main River 1% AEP +35% climate change scenario) is less than 0.5% of the site area, and the Flood Zone 3a (surface water) extent is below 5% of the site.

5% has been chosen as a reasonable minimum percentage to assess the sites that are at risk of surface water flooding. This was deemed to represent both a precautionary and proportionate threshold, and whilst each site needs to be considered individually and on its own merits, employing a threshold as low as 5% should mean that there is sufficient space within the site to design the layout to avoid the need to locate the most vulnerable aspects of the development within the Flood Zone 3a (surface water) extent.

Individual SFRA Level 2 Site Assessments are included in the SFRA Level 2 for 18 sites set out in Appendix 3. These are proposed allocation sites which contain a risk of flooding on 5% or more of the site area of flooding from all sources.

It is intended that the Site Assessments will enable developers to provide appropriate flood risk mitigation for their site, and they outline how this can be achieved. The Site Assessments also provide information to support the application of the Exception Test to justify development on these sites.

Appendix 1 – Sites in Flood Zone 1

SFRA ID	Site Ref	Name	Proposed Use	Vulnerability Classification	Site Area (ha)	FZ2 (% of site area)	FZ3a (Fluvial & Tidal - % of site area)	FZ3b (Fluvial & Tidal - % of site area)	Main River 35% CC (% of site area)	FZ3a (Surface Water - % of site area)	1 in 30yr RoFSW Extent (% of site area)	Sequential Test Required?	Exception Test Required?
1	O10	Harrow View Telephone Exchange	Residential	More Vulnerable	0.28	0.00	0.00	0.00	0.00	0.00	0.00	NO	NO
6	OA8	Former Royal Mail Sorting Office, Elmgrove Road	Residential, Industrial	More Vulnerable	0.3059	0.00	0.00	0.00	0.00	0.00	0.00	NO	NO
33	OA17	Former Kodak Administration Offices	Residential, Flexible employment space	More Vulnerable	0.4711	0.00	0.00	0.00	0.00	0.00	0.00	NO	NO
51	O13	Harrow Arts Centre	Arts centre & associated uses	Less Vulnerable	0.73	0.00	0.00	0.00	0.00	0.00	0.00	NO	NO
53	O2	Roxeth Library & Clinic	Residential, Community uses Town centre uses NHS floorspace	More Vulnerable	0.13	0.00	0.00	0.00	0.00	0.00	0.00	NO	NO
64	OA3	15-29 College Road	Residential, Town centre uses Public realm Reprovision of place of worship / social infrastructure	More Vulnerable	0.3765	0.00	0.00	0.00	0.00	0.00	0.00	NO	NO
74	OA12	Peel Road	Residential, Car parking Place of worship Civic / community uses NHS floorspace	More Vulnerable	0.5146	0.00	0.00	0.00	0.00	0.00	0.00	NO	NO
76	O18	Wolstenholme	Residential	More Vulnerable	0.2503	0.00	0.00	0.00	0.00	0.00	0.00	NO	NO

The sites in Table above fall entirely within Flood Zone 1 and can be allocated for all uses within the sites without the need to consider alternatives from a flood risk point of view.

Appendix 2 – Sites where Flood Zone 3a (fluvial), Flood Zone 3b (fluvial) and / or Flood Zone 3a (surface water) extent is less than 5% of the site

SFRA ID	Site Ref	Name	Proposed Use	Vulnerability Classification	Site Area (ha)	FZ2 (% of site area)	FZ3a (Fluvial & Tidal - % of site area)	FZ3b (Fluvial & Tidal - % of site area)	Main River 35% CC (% of site area)	FZ3a (Surface Water - % of site area)	1 in 30yr RoFSW Extent (% of site area)	Sequential Test Required?	Exception Test Required?
35	O22	Stanmore Station Carpark	Residential, Car parking	More Vulnerable	1.39	0.00	0.00	0.00	0.00	2.07	0.00	YES	YES
36	O20	Canons Park Station Carpark	Residential, Car parking	More Vulnerable	0.43	0.00	0.00	0.00	0.00	0.90	0.00	YES	YES
38	O12	Hatch End Telephone Exchange	Residential, Town centre uses (within designated shopping frontage)	More Vulnerable	0.3783	0.00	0.00	0.00	0.00	0.01	0.00	YES	YES
43	OA7	Tesco Station Road	Residential, Supermarket	More Vulnerable	2.28	0.00	0.00	0.00	0.00	0.68	0.00	YES	YES
44	OA9	Poet's Corner & Milton Road	Residential, Town centre uses to serve development NHS floorspace Community floorspace Open space	More Vulnerable	4.46	0.00	0.00	0.00	0.00	3.81	1.62	YES	YES
47	GB1	RNOH	Residential, Hospital Research & innovation institutions Green Belt	More Vulnerable	41.11	0.00	0.00	0.00	0.00	3.69	2.19	YES	YES
50	O7	Rayners Lane Station Carpark	Residential, Car parking Town centre uses (eastern part of site only)	More Vulnerable	0.85	0.00	0.00	0.00	0.00	3.37	1.81	YES	YES
52	OA16	Kodak	Residential, Industrial and employment (B2 & B8) NHS floorspace E use class to service development and immediate area F1 learning and non-res. Institutions including primary school Community centre Green link	More Vulnerable	14.9960	0.00	0.00	0.00	0.00	2.06	0.64	YES	YES
57	OA4	Havelock Place	Residential, Town centre uses	More Vulnerable	0.9480	0.00	0.00	0.00	0.00	3.00	1.81	YES	YES
71	OA14	Bryron Quarter	residential, Leisure & community uses Car parking NHS floorspace	More Vulnerable	5.74	0.00	0.00	0.00	0.00	2.44	1.09	YES	YES
72	O4	Grange Farm	Residential, Community hub Open space	More Vulnerable	4.08	0.00	0.00	0.00	0.00	1.52	0.42	YES	YES
77	OA6	Greenhill Way	Residential, Town centre uses	More Vulnerable	1.8428	0.00	0.00	0.00	0.00	0.02	0.00	YES	YES
78	OA5	Station Road East, Harrow	Residential, Town centre uses	More Vulnerable	0.8805	0.00	0.00	0.00	0.00	1.59	0.00	YES	YES
79	O5	Harrow School Estate & John Lyon School	Refurbishment / redevelopment of school buildings, sports facilities and enhancement of playing fields	More Vulnerable	112.71	0.00	0.00	0.00	0.00	3.38	1.60	YES	YES

Due to these sites all having less than 5% risk of surface water flooding, it is considered that they can be appropriately designed to ensure that development does not worsen this risk on or off-site by way of design requirement in the allocation, and condition on future planning applications.

Appendix 3 – Sites where Flood Zone 3a (fluvial), Flood Zone 3b (fluvial) and / or Flood Zone 3a (surface water) extent exceeds 5% of the site, or where the extent of Flood Zone 3a (fluvial), and Flood Zone 3b (fluvial) is below 5% but the Main River 1% AEP +35% climate change scenario extent exceeds 5% and where exception test was recommended as part of Screening Assessment

SFRA ID	Site Ref	Name	Proposed Use	Vulnerability Classification	Site Area (ha)	FZ2 (% of site area)	FZ3a (Fluvial & Tidal - % of site area)	FZ3b (Fluvial & Tidal - % of site area)	Main River 35% CC (% of site area)	FZ3a (Surface Water - % of site area)	1 in 30yr RoFSW Extent (% of site area)	Sequential Test Required?	Exception Test Required?
2	O17	Kenton Road Telephone Exchange	Residential, Town centre uses Community uses	More Vulnerable	0.08	6.24	0.00	0.00	2.96	1.45	0.05	YES	YES
7	OA1	Queen's House Carpark	Residential, Town centre uses Car parking	More Vulnerable	0.32	0.00	0.00	0.00	0.00	9.63	1.08	YES	YES
8	O9	Pinner Telephone Exchange	Residential	More Vulnerable	0.5109	68.40	11.87	6.16	26.05	7.46	6.54	YES	YES
11	OA15	Iceland Wealdstone	Residential, Retail	More Vulnerable	0.22	0.00	0.00	0.00	0.00	17.05	12.60	YES	YES
12	O14	Vernon Lodge	Residential	More Vulnerable	0.3556	0.00	0.00	0.00	0.00	23.24	11.82	YES	YES
13	OA10	Wealdstone Parole Office	Residential, Replacement employment space (industrial or related)	More Vulnerable	0.1654	0.00	0.00	0.00	0.00	13.29	0.02	YES	YES
21	OA11	Carpark Ellen Webb Drive	Hotel Town centre uses Car parking reprovision	More Vulnerable	0.32	0.00	0.00	0.00	0.00	12.51	9.68	YES	YES
39	O3	Northolt Road Nursery and Carpark at rear of 27 Northolt Rd	Residential, Nursery Offices	More Vulnerable	0.2987	0.00	0.00	0.00	0.00	5.83	1.90	YES	YES
42	O19	Marsh Lane Gas Holders	Residential	More Vulnerable	0.88	0.00	0.00	0.00	0.00	9.96	1.80	YES	YES
48	GB2	Watling Farm	Gypsy & traveller pitches	Highly Vulnerable	1.0610	0.00	0.00	0.00	0.00	11.60	6.52	YES	NO
49	O21	Anmer Lodge	Town centre uses including supermarket (1,600 sqm) Car parking	More Vulnerable	1.37	0.00	0.00	0.00	0.00	21.23	7.49	YES	YES
54	O15	Belmont Clinic	Health care centre Community or town centre uses	More Vulnerable	0.37	0.00	0.00	0.00	0.00	5.50	0.00	YES	YES
55	O11	North Harrow Methodist Church	Residential, Church & community facilities Limited retail use	More Vulnerable	0.3354	0.00	0.00	0.00	0.00	5.24	0.00	YES	YES
56	OA13	Travis Perkins Wealdstone	Residential, Industrial (or related)	More Vulnerable	0.4316	25.14	0.00	0.00	0.00	0.00	0.00	YES	NO
59	O6	Brethren's Meeting Hall, The Ridgeway	School	More Vulnerable	1.39	0.00	0.00	0.00	0.00	10.89	3.11	YES	YES
65	OA2	Harrow on the Hill Underground and Bus Stations	Residential, Rail & bus transportation hub Town centre uses	More Vulnerable	1.18	0.00	0.00	0.00	0.00	8.73	6.01	YES	YES
80	O8	Harrow West Conservative Association	Residential, Community or employment space	More Vulnerable	0.1592	0.00	0.00	0.00	0.00	18.26	1.34	YES	YES
82	O1	Waitrose South Harrow	Residential, Supermarket	More Vulnerable	1.5664	0.00	0.00	0.00	0.00	11.35	4.41	YES	YES

Due to the limited availability of sites in the borough, and all of the sites having limited (generally 25% of the site or below) risk of flooding from all sources, it is considered that the exceptions test can be met. Details of how flood risk can be managed on these sites is included in the Harrow SFRA2 2024.