

15 December 2024



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

Mark Thomson

By Email Only

Dear Sir/Madam,

REPRESENTATION ON BEHALF OF DANDI LIVING HARROW REGULATION 19 LOCAL PLAN CONSULTATION

We are instructed by our client, Dandi Living (*the Client*), to formally submit representations to the London Borough of Harrow (*the Council*) in relation to the Harrow Regulation 19 Local Plan Consultation, which is subject to consultation until 17 December 2024. This letter seeks to provide representations on the Regulation 19 Draft Plan, as well as the latest evidence base, building upon the representations made to the Council at Regulation 18 stage in April 2024.

Dandi Living are a London-based real estate company, and co-living operator. They own and operate sites within Harrow and are committed to contributing to the Borough's growth and development. These representations primarily relate to the site known as the Former Kodak Administrative Offices (*the site*), located on Headstone Drive. There is a currently pending planning application at the site (reference: PL/1152/24), which was validated by the Council on 23 May 2024. Our client is the long-term owner of the site.

This letter is structured in providing commentary on relevant policies as presented within the Draft Local Plan, as well as the emerging Site Allocation.

Representations

This section details the representations pursuant to relevant draft policies within the Regulation 19 Local Plan which we consider to require amendments to ensure that they align with and support our Client's future aspirations for the site, including the currently pending planning application, and their interests within the Borough.

Policy HO9: Large scale purpose built and conversion for shared living

We recognise that one change has been made to this policy within the latest draft Plan, whereby criteria A (c) has been amended to allow for co-living developments to be located anywhere within the boundary of the Harrow and Wealdstone Opportunity Area. Whilst this is welcomed, as set out within our Regulation 18 representations, there are other areas, including designated town centres which have high public transport accessibility and level of local services and amenities which would not fall within the criteria, but would be able to support LSPBSL. An amendment to this subsection is proposed in the below text box, to include district centres as well as areas of PTAL 4 and above, which would be considered to be highly accessible.

It is noted that no other changes have been made to this policy at this stage. For conciseness, we do not consider it necessary to repeat the justification as to other changes that we had suggested within our Regulation 18 representations, instead the suggested wording of draft Policy HO9 are shown below in tracked changes form:

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

- a) Proposals will be required to demonstrate how they are meeting an identified local housing need based on local incomes, rent levels and existing/future demographics of the Borough
- b) Applicants will be required to demonstrate the affordability of the proposed LSPBSL products within their scheme compared with the alternative products within the Harrow private rental sector,
- c) Proposals should be located within any of Harrow's designated town centres, areas of PTAL 4 or above, or within the boundaries of the Harrow and Wealdstone Opportunity Area
- d) There must not be two LSPBSL schemes within a 250m walking distance of each other to avoid an over-concentration of similar uses. To justify a departure from this requirement, applicants will be required to demonstrate exceptional circumstances. Robust evidence will be required to demonstrate:
 - I. There is no appropriate alternative town centre use such as offices, and C1 hotels or mixed-use schemes (where relevant) that would be suitable and viable on the application site
 - II. There is no appropriate alternative use for the site that would be suitable and viable (including C3 residential or a mixed-use scheme), and
 - III. It would be unviable, unsuitable to have a LSPBSL scheme developed at a lower scale via multiple uses (preferably in two separate blocks of development) that incorporates part of a site/development for LSPBSL the remainder for alternative uses in line with criteria (i) and (ii) above
- e) The LSPBSL scheme should not have a detrimental impact to;
 - I. Residential amenity of the neighbouring properties and surrounding area
 - II. The character of the area
 - III. The need to support and maintain mixed and inclusive communities
- f) Proposals on sites with extant permission or allocated for self-contained dwellings will not be supported to avoid compromising the delivery of conventional housing to address future needs and targets, unless adequate evidence is submitted to demonstrate viability issues
- g) The ground floor of the scheme should be designed and located to be active street frontage or public realm. It must include: i) Flexible workspaces, ii) Public amenities (e.g. restaurants, cafes, leisure facilities) that are accessible to the wider public, to integrated it into the surroundings area, as well as develop inclusive and sustainable communities.
- h) To support a circular economy, proposals must demonstrate a flexible design and layout to allow the LSPBSL scheme to be converted/retrofitted to an C1 hotel or Purpose Built Student Accommodation ~~C3 self-contained residential uses~~, or other town centre uses without the need for substantial demolition and rebuild
- i) Proposals must demonstrate satisfactory servicing arrangements are in place for deliveries, waste management and emergency vehicles and no adverse impact on the safe operations of the highway network, in line with other Local Plan Policies
- j) The applicant must provide a management plan, to the satisfaction of the Council, to address the requirements of the Policy H16 of the London Plan and the Mayors London Plan Guidance on LPBSHL. This will be secured by way of a S106 agreement. The design and layout of LSPBSL schemes in terms of their layout, functional living spaces, level and type of communal facilities must be in compliance with the LSPBSL London planning guidance (LPG)

B. The design and layout of LSPBSL schemes in terms of their layout, functional living spaces, level and type of communal facilities must be in compliance with the LSPBSL London planning guidance (LPG)

C. Affordable housing contributions will be required, in accordance with London Plan Policy H16 D. The Council will resist any proposals that seek to reduce the quantity, type or restrict access to amenity provisions included within LSPBSL, after permission has been granted.

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Site Allocation OA17

We welcome that the site has been allocated as a potential site for development within the draft Local Plan. It is however suggested that a number of amendments should be made to the allocation prior to the submission of the Plan.

First, under the 'Relevant Planning Applications' section, the reference number of the currently pending planning application is incorrectly stated as 'P/1154/24', which should be amended to read 'PL/1152/24'.

Second, as previously stated, we believe that the Site's SIL designation should be removed. The SIL designation in this area only covers the Site and the larger active industrial area to the north and east of the former Kodak site (please see Figure 1 below).

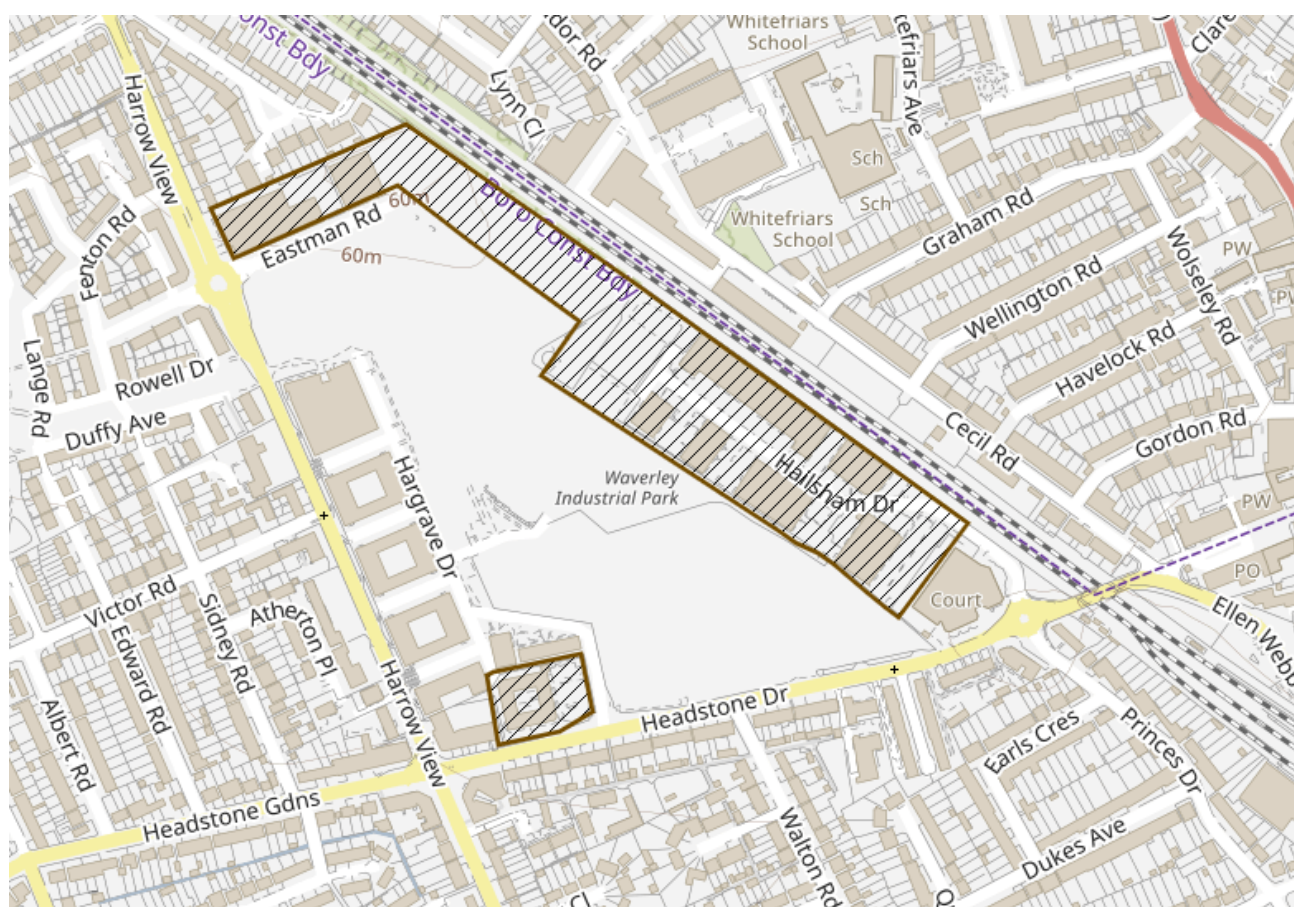


Figure 1: SIL designated land within the Kodak Site (London Borough of Harrow, 2024)

It is considered that the SIL designation likely covered the entirety of the Kodak site prior to the implementation of the Harrow View East masterplan, and as sites were developed within the area, the SIL designation has been removed from these areas, leaving the Site isolated in terms of its SIL designation. The Site is surrounded by residential buildings immediately to the north, west and east, and this makes its use for a significant number of industrial uses incredibly challenging in terms of impact on neighbouring residential amenity. This is supported by long period of marketing for a range of employment uses. Further, it should be considered that the Site was historically used as the administrative offices to the Kodak Factory, and therefore the Site was never in industrial use but rather in office use. The client is however amenable to providing a quantum of high-quality, flexible employment floorspace on the Site reflecting the current office use of the site, as set out in the

current planning application. However, this needs to be underpinned and supported by residential or alternative uses to ensure any scheme for the site with replacement employment floorspace is deliverable.

Any future site allocation should therefore seek to promote a mixed-use development encouraging flexible employment uses on site, and not set an overly restrictive requirement to provide industrial uses on the site, which would not be compatible and sympathetic with the immediate surrounding context of residential uses.

As such, it is considered that the SIL designation should be removed from the site and allocation, as such, within the 'Allocated Uses' section of the site allocation, the uses should be re-worded so that industrial use is not considered a 'leading' land use.

Conclusion

Overall, we welcome the changes that have been made to the draft Plan, including the site's inclusion within the Plan's site allocations, however we continue to request that some minor changes be made to Policy HO9 and Site Allocation OA17 to provide further support for the viable redevelopment of the site.

We trust the above representations will be taken into account at this stage of preparing the Plan and look forward to reviewing following stages of the Plan to ensure that the representations have been taken into consideration.

We would welcome the opportunity for further discussion and engagement with the Council to discuss the representations in this letter and how the next iteration of the Plan could respond to the requested changes and issues raised.

It would be appreciated if you would acknowledge receipt of this letter of representation. We reserve the right to supplement this letter at a later date, if required.

If there are any queries, please do not hesitate to contact me or my colleague Fergus Wong. Please note that as we are currently acting on behalf of Dandi Living in respect of the above site, we request that all future correspondence for matters concerning these sites be directed to Savills.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Mark Thomson MRTPI
Director