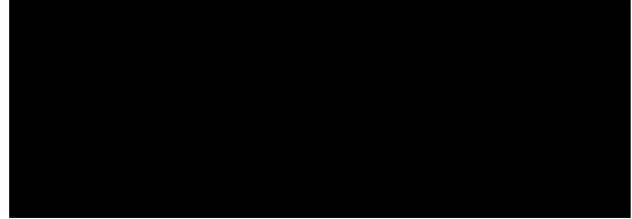




Harrow Council - New Local Plan  
Planning Policy Team  
London Borough of Harrow  
Forward Drive  
Harrow  
HA3 8FL



17th December 2024

Dear Sir/Madam,

### [Harrow – New Local Plan Consultation Reg 19](#)

On behalf of our client 'Kosy Living' we are writing in response to the current consultation of the new Harrow Local Plan.

Kosy Living are promoting land at 52-68 Palmerston Road for a co-living development. The proposal is to demolish the existing buildings on site and construct a building providing 148 co-living units with light industrial use at the ground floor level. These would comprise the equivalent of 82 traditional C3 units. This figure is calculated by using the figures set out in the Government's Housing Delivery Test Measurement Rulebook, which states that *"the comparative ratio applied to communal accommodation will be based on the national average number of adults in all households, with a ratio of 1.8:1"*. In this case, applying the 1.8:1 ratio would mean that the 148 co-living units proposed equates to 82 traditional C3 units.

Kosy have designed a deliverable proposal which is currently progressing through the pre-application process. It is therefore well progressed and could be delivered swiftly.

This response is accompanied by the DAS, the Townscape Report and the Planning Report which formed the second pre-application submission.

Our client has experience developing and operating a number of co-living housing schemes across London. Although the final product varies between operators, this form of housing essentially provides smaller studio units with shared facilities for residents. This model of housing provides accommodation for a range of ages groups, but primarily focuses on single households in their twenties or thirties that may be unable to buy due to high housing prices and are unable to afford a rental property alone.

The building remains in single ownership which allows management of the site and shared facilities. Therefore, it not only provides more affordable and quality housing option, but also offers a communal living experience for residents. These shared facilities vary with each operator and their target market, but typically include shared kitchen and dining spaces along with study spaces, gym, or entertainment spaces.

This is a relatively new form of housing although there are now a number of operational projects across the capital that clearly demonstrate how this model of housing works. We appreciate that there has been a need for regulation of this housing to ensure that appropriate standards of housing



are still provided and indeed, it is in the operators interest to provide quality accommodation as they retain and manage the asset.

Co-living is a sustainable form of development which is an effective use of land and also helps to promote strong vibrant and healthy communities. Our client welcomes Harrows initiative on and developing a policy on this topic, in line with other boroughs and the Greater London Authority (GLA). This provides developers and investors with some clarity on the expectations of the Council when choosing to invest in the borough. Our client has previously engaged with the LPA in respect of the emerging local plan and also call for sites.

We support the Councils work in progressing the Local Plan to this final stage before submission to the Planning Inspectorate for examination. The need for a Local Plan that supports the growth of the borough is fully supported by the NPPF and it is this document that will be used to determine that the plan is sound.

We have reviewed the current 'Reg 19' draft Harrow Local Plan with a particular focus on policies specific to large-scale purpose-built shared living (LSPBSL) - Policy HO9 for LSPBSL; and OA13 Site allocation that includes our clients site (52-74 Palmerston Road, Harrow, HA3 7RW).

Regarding the plan-making process, the NPPF (2024) para 16 states among other points, that plans should be '*prepared positively, in a way that is aspirational but deliverable*' and avoid '*unnecessary duplication*'. The NPPF (2024) para 36 also sets out the tests of soundness and these tests will ultimately form the basis of the forthcoming Examination of the Local Plan by the Planning Inspector. Para 36 specifically requires plans be 'positively prepared' and that policies in the plan are justified, effective and consistent with national policy. We provide the following comments with these NPPF principles in mind.

## Large Scale Purpose Built Shared Living (LSPBSL)

### *Policy context for LSPBSL*

Looking at the policy context for this form of housing, the NPPF (2024) is silent on this housing type specifically. However, the overall aim is to '*meet an area's identified housing need, including with an appropriate mix of housing types for the local community*' (Para 61) and the need should include a variety of '*size, type and tenure of housing ... for different groups in the community*' (Para 63). Chapter 11 of the NPPF clearly promotes the efficient use of land (para 124) with a focus on town centre locations well served by public transport (Para 130(a)).

The London Plan (2021) provides the over-arching strategic policy direction for London. Policy H16 refers to LSPBH schemes and recognises them as a form of housing for those that '*cannot or choose not to live in self-contained homes or HMOs*' and is seen as an alternative to traditional flat shares. The policy seeks to ensure that such developments provide acceptable quality and well-managed living for residents. As a strategic planning policy, it is therefore ideally placed to provide specific spatial requirements and on this matter the policy requires development to '*contribute towards mixed and inclusive neighbourhoods*' and be '*located in an area well-connected to local services and employment ... and is not car dependant*'. It does not seek to contain the location/number of LSPBSL.

The LSBPSL Guidance (2024) however goes into more detail on both the location and design of such schemes, albeit it is 'guidance' and not policy as such. Regarding their location, the Guide reiterates



policy H16 that they be in 'well-connected, well-served areas'. These should be metropolitan or major town centres, areas of PTAL 5 or 6 or 'other town centres with high or medium growth potential' and car free. Such locations 'may be refined further by Local Plans according to their wider spatial and housing strategies.'

The guide recognise that this form of housing can have mixed results on a neighbourhood. While it can add to a housing mix where this type of development is lacking, it can also be seen to 'crowd out' conventional housing schemes and affect the boroughs ability to meet a range of needs. With reference to plan making, the guidance states (paras 2.2.4 and 2.2.5)(emphasis ours):

*'Local Plans should identify where spatial or delivery concentrations of LSPBSL (relative to conventional housing) may be emerging and impacting on the ability to ensure mixed and inclusive neighbourhoods. This information could be used to develop spatial policies, or to indicate the significance of neighbourhood or pipeline housing mix in decision-making.*

*In areas where demand for LSPBSL is likely to be particularly high, and this could have a negative impact on creating mixed and inclusive neighbourhoods, local planning authorities may, with appropriate evidence: introduce a local policy framework that limits the number of developments or units within a defined area; ensure separation; or focus LSPBSL in specific places. More positively, they can identify areas where LSPBSL could be beneficial as part of the housing mix. Any such policy should be **sufficiently flexible** to ensure any **limits are not applied arbitrarily.**'*

It is clear from national, regional and local policy that there is a requirement to plan spatially for various types of housing; and when doing so, there are several points to keep in mind:

- LSPBSL is defined as 50 units or more and therefore logically it is not of a scale that is suited to low-rise suburban areas.
- This housing model focuses on the younger more mobile population suited to town centres locations with access to bars, pubs, entertainment and good connections to other town centres. These locations are not areas suitable for conventional family housing.
- Proposals are required to be car-free and required in policy to be well served by public transport (PTAL 5 or 6).

Logically then, LSPBSL should be located in town centres with a high PTAL and access to services.

The London Plan guidance also suggests three spatial measures that could be used in plan-making for LSPBSL. These are measures are proposed as separate measures (i.e. not used collectively); and are to be applied not just where there is a demand for LSPBSL, but where the demand is expected to impact negatively on neighbourhoods. Furthermore, these policies must be applied flexibly with no 'arbitrary limits' and must be supported by appropriate evidence.

### LSPBSL and LBH housing need

The Harrow Local Housing Needs Assessment update from February 2024 is an evidence document which informs the plan. This concludes that there is a limited demand for single housing and an increasing demand for family housing.



However, there are some more detailed conclusions within the report. These set out some useful information about co-living, concluding that whilst a small decline in single young person households is projected, co-living could be a policy led response to the increasing lack of housing for younger people in the area. Schemes could have a role in short term housing for groups such as recent graduates looking to establish themselves in Harrow as an alternative to living in HMOs.

A further matter discussed in the report and supporting text in the policy is that if there is a sufficient supply of high quality housing for single persons or couples then this may free up family sizes accommodation which is currently occupied by sharing young households living in multiple occupancy. Purpose built co-living is described as meeting the needs of some single people and couples as a short-term lifestyle choice before they move to more permanent accommodation.

#### *Harrow Policy HO9 for LSBPSL*

While our client supports the clear policy direction for LSPBSL, we are concerned that the wording of the policy in its current form is overly restrictive and does not represent positive plan-making that is evidence led.

In the first instance, the evidence base does not indicate an increased *future* demand expected for this type of housing and certainly not one that would result in a concentration that prevents more 'conventional' forms of housing coming forward.

Second, there is no evidence that there is *already* a 'particularly high' demand for this type of housing in the borough; or that current demand for LSPBSL is having a negative impact on neighbourhoods.

Third, the evidence demonstrates demand for family housing. HMO's and flat shares in the suburban area compete with family housing, however LSPBSL provide suitable alternatives that would help free up family housing for families.

Therefore, there is no justification for the overly restrictive wording of Policy HO9 and it fails the soundness tests set out in Para 36 of the NPPF.

The following looks at each part of Policy HO9 Part A noting what items we request are removed and/or amended:

- (a) and (b) – this policy requirement is unnecessarily onerous and not applied to other similar forms of managed housing such as Build to Rent (BtR) or student accommodation. Housing need is determined by existing and future demographics and this should form part of the LPA evidence base. As already noted there is no evidence of an overwhelming demand for this form of housing that would justify the stringent wording of this policy. Furthermore this policy requirement over-simplifies the issue to income and affordability matters alone – ignoring other reasons people choose to live in this form of housing such as central location, amenities and community living. *This part of Policy HO9 provides an unnecessary restriction and is not positive plan-making.*
- (c) – Although it is reasonable to limit LSPBSL to a specific area (as per the London Plan guidance), we would suggest a more consistent approach across the Local Plan and either adopting similar wording to Policy HO8 for purpose built student housing; or increasing the defined areas available as per build to rent Policy HO3(Part G). This would be more



appropriate and consistent wording across the Local Plan. *This part of Policy HO9 is inconsistent with the document as a whole and is not positive plan-making.*

- (d) – this is a wholly unnecessary restriction to development with no evidence to support the arbitrary 250m requirement. This policy provides another hurdle to development that is unjustified. LSPBSL is retained in single ownership and therefore it is in the applicants long term interest to ensure it as a viable business model in terms of proximity to nearby competition. BtR and Student Housing are a similar forms of managed housing in single ownership, however the Local Plan does not subject these to the same spatial limitations. If there is an evidence based concern that conventional housing is being crowded out by a concentration of alternative housing (inc. LSPBSL, BtR etc.), then the wrong metric is being applied in this policy - density is not controlled by an arbitrary linear measurement but rather by the proportion of ‘conventional’ housing to ‘alternative’ forms of housing as a whole. Finally, in the event that this form of housing is no longer needed, part (h) will ensure that it can be re-purposed to conventional housing. *This part of Policy HO9 provides an unnecessary restriction and is not positive plan-making.*
- (e) – these are important considerations but secured via other local plan policies (inc. GR1, GR2, GR3, GR4) and unnecessarily repeated. Such matters are considered on a case by case basis as part of development control. *This part of Policy HO9 is unnecessary is not positive plan-making.*
- (f) – no comment
- (g) – no comment
- (h) – this policy underlines the onerous spatial policies of parts (a), (b), (c), and (d). In the event that the development is not needed, it would ensure that the building can be re-purposed to ‘conventional’ housing; and far more readily than other forms of development such as large footprint office or industrial development.
- (i) – although important considerations this is secured via other policies (inc. M1, M2, M3) inc. part (j). *This part of Policy HO9 is unnecessary is not positive plan-making.*
- (j) – no comment

In summary, although there is a need for policy direction for LSPBSL:

- there is no evidence to suggest that current and future demand for LSPBL is at a level that will prevent the borough delivering other forms of more ‘conventional’ housing.
- there is no evidence that this form of housing is having a negative impact on neighbourhoods.
- there is no evidence for an arbitrary measurement between developments, or that a linear measurement is an appropriate metric to limit a ‘concentration’ of different forms of housing numerically.

On the other hand, LSPBSL provides an alternative option to HMOs and flat shares, potentially freeing up family housing. Other forms of housing in single ownership are not subject to the same restrictions and there are policies within the Local Plan that can secure appropriate management and future use of the development.

Overall, the wording of the current policy is not evidence based and overly restrictive. It is not positive-plan making and provides barriers to development. Certain parts of the policy are unnecessary and secured by other policies. In it’s current form, Policy HO9 does not meet the tests of soundness required by the NPPF.



### Site Allocation - OA13

A policy to guide the future development of the current Travis Perkins Builders merchant and an adjacent car park has now been included in the emerging plan. The site covers 24-68 Palmerston Road in Harrow and includes our client's site (52-68 Palmerston Road) as referenced earlier in this response.

Whilst the allocation of the site is welcomed in principle, there are a number of elements of the policy that we have assessed as not positively prepared or unsound. The policy requires re-wording to ensure that it meets the tests of soundness set out at para 36 of the NPPF.

In terms of relevant designations, the site lies within the Harrow and Wealdstone Opportunity Area (HWOA). An area action plan for this area was adopted in 2013. The HWOA is described as one of the most sustainable and central locations in the Borough and is a focus for growth with Strategic Policy 03 setting out that the area will accommodate a minimum of 8750 new homes during the plan period. The HWOA is also confirmed as an area which offers significant opportunity for urban renewal and intensification.

Policy H09 (large scale purpose built and conversions for shared living) states that these types of proposals should be located within the boundary of the HWOA.

### **Reference to Compulsory Purchase Orders**

We strongly object to the statement in OA13 regarding using compulsory purchase powers where appropriate. This is a negative approach and is contrary to positive plan making.

It is evident from government guidance on this matter that a CPO should be a last resort as it is a mechanism for acquiring land without the consent of the owner. There is no evidence that a CPO would be necessary – an alternative approach would be to state that if parcels within the allocation come forward separately, they need to demonstrate that they would not fetter the rest of the site coming forward for development.

If the Inspector does agree with the Council that it reasonable to cross refer to CPO powers, then reference to the use of CPO is already set out within emerging policy GR12 (Site Allocations) and does not need repeating in OA13.

Our client's site could come forward in its own right and this option should be considered by the Council. This would be a justified approach which would enable this part of the site to be delivered at the earliest opportunity, without delay, providing a boost to the Council's housing delivery before the 6-10 year period currently envisaged in the emerging policy.

Any proposal by our client which takes forward a smaller part of the site than the entire allocation would be set within the context of a site-wide masterplan which would demonstrate how an individual proposal would not fetter the rest of the site from coming forward in a way which complies with the overall aims for the allocation.

As set out above, the policy should reference a requirement for the landowners to work together to prepare a holistic masterplan for the entire site - this would obviate any need for a CPO and would be a justified and effective approach which would accord with the tests of soundness set out in



paragraph 36 of the NPPF. Any individual application could therefore be assessed in terms of conformity with the site masterplan.

### **Approach to Industrial Land**

We note that the site is located within a Locally Significant Industrial Site. This is a local designation. However, the current use of the site is industrial (B2) and Sui Generis. It is used for a car yard including sales and repairs.

As discussed earlier in this response, the site lies within the Harrow and Wealdstone Opportunity Area. There is an associated Area Action Plan (AAP) for this area which sets out that one element of the borough's spatial strategy is "changing the land use mix' to include more residential, more smaller businesses, less industrial activity, more open space (para 3.18). Another element is "consolidation" of industrial areas and mixed use development of sites no longer suited for these uses.

It is relevant that the existing employment space at the site generates a very low amount of employment given its size: just six FTE employees work across the entire site. This is partially because the site is used as a car yard and a large percentage of the site is taken up by storage space for vehicles in association with the car sales use. The majority of the site is in practice therefore in 'vehicle sales' use (generally considered to be sui generis rather than industrial) rather than a traditional industrial use. The remainder of the site is in vehicle repair / maintenance use.

Although the proposed development will result in the change of use of the existing employment uses at the site, high-quality replacement employment-generating space will be provided at ground floor level to mitigate the loss of the existing employment space. It is envisaged that this new space, combined with the new employees who will be required to manage and service the co-living element of the use, will lead to considerably greater employment generation on the site compared to the existing use. Additionally the scheme can make provision for co-working opportunities. This accords with the findings of the West London Employment Study of 2022 which concluded that existing industrial spaces should be protected and that there should be renewal and provision of new quality spaces where possible.

It is evident that there is potential for the employment yield of the site to increase through the redevelopment of the site. The scheme for our client's site which is currently at pre-application stage now shows 410 sqm light industrial use on the ground floor, the end use of this could be managed by a future planning condition to ensure that it is compatible with the rest of the proposal.

The local plan is the time to consider whether sites are currently in the most appropriate use and to re-allocate sites accordingly. We question whether the site is correctly designated as a LSIS when there are only 6 employees and it is in sui generis use.

Additionally, the Council's latest schedule of industrial sites shows 42 vacant units (September 2024) which is a considerable quantum which does not indicate an urgent need to protect existing sites for industrial uses. The Council should be mindful of the London Plan policy that states that "Where industrial land vacancy rates are currently above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate.....".



The current wording of OA13 states that any redevelopment of the site should prioritise the re-provision of appropriate industrial floorspace at the site – ‘ensuring **minimal reduction of the employment offer**’. However, limiting this to industrial floorspace is overly restrictive and not justified by the current evidence on demand. The current wording is therefore unsound. Changing the wording to refer to the appropriate re-provision of appropriate employment generation at the site would be a more effective response to the evidence and would assist in meeting the tests of soundness.

We also note that, given the highly sustainable location, the site is ideally located for co-living uses. We note that there is support for colocation on LSIS sites set out within the Council’s West London Employment Land Review from 2022. Within this document colocation in these locations is described as a “nascent market” with scope for further innovation to support genuine colocation. This is supported by policy E7B of the London Plan.

### **Tall Buildings**

We welcome the reference to the support for part of the site coming forward for some tall building development as set out within the Harrow and Wealdstone Opportunity Area Tall Building Study (2004). Our client’s site is within an area considered to be suitable for taller development for a number of reasons including the following:

- Within Harrow and Wealdstone Opportunity Area
- Within an Area of Intensification in the Harrow and Wealdstone Area Action Plan
- In close proximity to a town centre
- Highly accessible to public transport and on a strategic movement corridor (over 9m in width)
- In close proximity to existing tall buildings located immediately to the south, suggesting sustainable location in terms of strong relationship between existing building heights
- Heritage sensitivity in immediate vicinity is limited

### **Residential Capacity**

We disagree with the indicative residential capacity expressed within the policy (36 C3 dwelling houses/units or equivalent). This is too restrictive. Additionally it is not justified by the evidence. There are a range of factors which support higher density development on the site as set out elsewhere in this response. These focus around the sustainability of the location – and the fact that it is previously developed and in a location assessed as suitable for tall buildings.

Government policy within the NPPF is clear (para 124) that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Substantial weight is given to doing this in a way that makes as much use as possible of previously developed land.

Additionally, para 129 of the NPPF stresses the need for development to make efficient use of land. Para 130 a) states that in town centres and other locations that are well served by public transport higher densities should be sought (unless there are strong reasons why this would be inappropriate).





There is support for this elsewhere in the emerging plan - Strategic Policy 01: High Quality Growth states that the HWOA can accommodate higher density development. Strategic Policy 03: Meeting Harrow's Housing Needs states that the Council will optimise opportunities to deliver housing in the Borough – within the most sustainable locations.

There therefore appears to be some internal inconsistency within the emerging plan in its current form in this regard.

It is unclear why the indicative capacity has been set at 36. The site can, in part, accommodate tall buildings and 36 units is unnecessarily restrictive and negative. The site could make a stronger contribution to meeting the Council's housing requirement in this highly sustainable location. The policy is therefore unsound in this regard.

In summary therefore, whilst we support the principle of policy OA13 and the support that it gives for the redevelopment of land including our client's site, we consider it unsound in a number of ways and in need of some re-drafting.

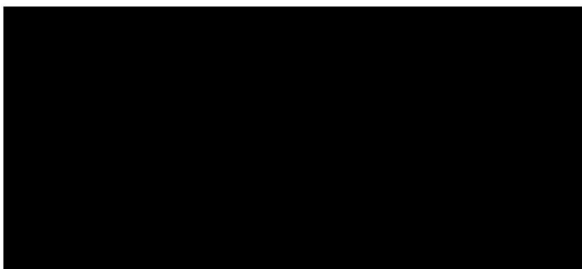
## Conclusion

Firstly we are supportive of the Council's progress in terms of plan-making as the NPPF is clear that the planning system should be genuinely plan-led. However, we do have concerns about parts of the plan (specifically policy H09 and site allocation OA13) which do not provide the positive vision sought by the NPPF.

Within this response we have set out where those policies which are of specific interest to our client require amendments in order to meet the tests of soundness. We have clearly set out what the issues are and how they should be addressed. We have noted some internal inconsistencies within the plan, together with some negatively worded repetition.

Together the matters raised, if taken forward, are unnecessarily restrictive and would fetter the deliverability of our client's site.

We hope that the policies can be amended and would like to attend the Examination to discuss these matters further with the Inspector.



Encs:



Third  
**Revolution**  
Projects

Pre-appl pack (Design and Access Statement, Townscape Report, Planning Report)