

16 December 2024

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



Ben Thomas

Dear Sir / Madam

**New Local Plan Consultation (Regulation 19)  
Representation in relation to Kenton Road**

Thank you for providing us with the opportunity to engage with the consultation on the Council's proposed submission of the latest New Local Plan (Regulation 19 version). I write on behalf of our client, Unibar Restaurant Ltd, who have an interest in the assessment and designation of Kenton Road.

The Kenton Road is a sustainable area that should be a focus for new housing and commercial growth. Kenton Road (the A4006) is a main road in the London Borough of Harrow (LBH) and the London Borough of Brent (LBB), dissecting the two local authorities. The road is well served by a range of services and amenities, and is considered to be a key route for both Boroughs due to its strategic location and accessibility credentials. This has been identified within Brent's Local Plan 2019-2041 (adopted in 2022) that designated Kenton Road as an 'intensification corridor' to direct growth of increased height and density toward due to its advantageous sustainability characteristics.

Intensification corridors are priority areas for additional housing as set out in Policy BH2 of the Brent Local Plan. We fully endorse this policy.

In our view the LBH Regulation 19 plan does not share the same ambition for growth although it is located opposite the Intensification Corridor.

The draft proposals map identifies Kenton Road as a Neighbourhood Parade which is defined as a Purpose-built small rows of shops along a road and outside of larger designated town centres, serving the convenience retail and other day-to-day needs of the immediate neighbourhood. Draft Policy LE1 Development Principles and the Town Centre Hierarchy.

Notwithstanding the strategic capacities of the road, Harrow's draft plan does not principally identify Kenton Road as an area to direct growth toward by way of policy provision or designation. Contrary to this however, the evidence base (*Harrow Characterisation and Tall Buildings Study (August 2021)*) prepared to inform the draft plan identifies Kenton Road as a 'Minor Corridor', described as an opportunistic area to intensify and direct growth toward due to its high levels of sustainability. The text of relevance is extracted below for reference:

*Harrow Characterisation and Tall Buildings Study (August 2021)*

- Paragraph 6.2 (Neighbourhoods: Key Features, Issues and Opportunities) states: "*Opportunities along Kenton Road to repair, intensify and improve the quality of this route*"; and
- Paragraph 6.4 (Appropriate Typologies) states: "*The A5 corridor is a key route running along the edge of the borough. Other more minor corridors include (Author's Emphasis) Honeypot Lane, Kenton Road, Marsh Lane and London Road. Due to the enhanced accessibility of these routes, they provide sustainable locations for growth. Often these routes are wider and could therefore benefit from development of a more significant scale to balance the width of tarmac*".



In alignment with the above evidence base, the draft plan sets out site allocations 016 (Travellers Rest, Kenton Road) and 017 (Kenton Road Telephone Exchange) for development, both of which are located along Kenton Road. These allocations are considered to endorse the suitability of Kenton Road to be identified as an area to direct growth toward by way of policy representation and / or designation. Further to this, this representation is supported by a research study for the intensification of Kenton Road has been prepared by Autor Architecture Ltd, to demonstrate how the relevant policies of both Councils could materialise in re-imagining the character of Kenton Road. The report identifies that there are number of sites that could accommodate additional growth if they were supported by planning policy.

In light of the above therefore, this representation proposes amendments to the plan that look to appropriately identify and designate Kenton Road for intensification due to its strategic and sustainable positioning.

Strategic Policy 01 policy sets out that strategic growth should be predominately within the Harrow & Wealdstone Opportunity Area. We consider that the policy should recognise other growth options especially in locations that are sustainable and accessible. Furthermore, the Plan should consider the adopted Brent Local Plan and respond accordingly to the Intensification Corridor designation along Kenton Road.

The proposed amendments are set out below.

### Comments on the Draft Local Plan

Draft Plan Wording	Comments (additional text in red)
<b>Strategic Policy 01: High Quality Growth</b>	
a. The Harrow & Wealdstone Opportunity Area can accommodate growth and higher density development due to its existing character, whilst the smaller centres and the strong suburban Metroland character areas are much more sensitive to change.	This criterion of the policy makes no reference to the development potential of Kenton Road which does not align with the evidence base. Accordingly, part a. should be amended as follows:  a. The Harrow & Wealdstone Opportunity Area can accommodate growth and higher density development due to its existing character. <i>Further to this, minor corridors such as Honeygot Lane, Kenton Road, Marsh Lane and London Road can accommodate growth and higher density development due to their enhanced accessibility and strategic location.</i> Smaller centres and the strong suburban Metroland character areas are much more sensitive to change.
b. New development and growth will predominantly be directed into the Harrow & Wealdstone Opportunity Area. New development within the Opportunity Area will by its nature be more intensive than elsewhere in the borough, due to the character of the area and its proximity to public transport and infrastructure.	This criterion of the policy makes no reference to the development potential of Kenton Road which does not align with the evidence base. Accordingly, part b. should be amended as follows:  b. New development and growth will predominantly be directed into the Harrow & Wealdstone Opportunity Area. New development within these areas will by its nature be more intensive than elsewhere in the borough, due to the character of the area and its proximity to public transport and infrastructure. <i>Development will also be directed to identified minor corridors provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development Plan.</i>

Draft Plan Wording	Comments (additional text in red)
<b>Strategic Policy 03: Meeting Harrow's Housing Needs</b>	
<p>3. The Council will support the delivery of new housing on a range of suitable sized sites, prioritising previously developed land, within the following locations:</p> <p>A. Harrow and Wealdstone Opportunity Area: A minimum of 8,750 will be delivered through extant permissions and on allocated sites within the opportunity area.</p> <p>B. Rest of the Borough: A minimum of 3,165 will be delivered through extant permissions and on allocated sites across the rest of the Borough.</p> <p>C. Small Sites: A minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the Plan and windfalls sites, in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail stations or a Metropolitan, Major, District town centre boundary, providing they are sensitively designed to protect and enhance the character of the Borough, particularly suburban areas.</p> <p>D. Windfall sites: Development of new housing on suitable sites (above 0.25ha), not identified within the Local Plan will be supported, provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development Plan.</p>	<p>This policy makes no reference to the development potential of Kenton Road which does not align with the evidence base. Accordingly, this policy should be amended as follows:</p> <p>A. Harrow and Wealdstone Opportunity Area: A minimum of 8,750 will be delivered through extant permissions and on allocated sites within the opportunity area.</p> <p>B. Rest of the Borough: A minimum of 3,165 will be delivered through extant permissions <b>and minor corridors</b> and on allocated sites across the rest of the Borough.</p> <p>C. Small Sites: A minimum of 4,125 new homes on small sites (below 0.25ha) will be supported on allocated sites within the Plan and windfalls sites, in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail stations or a Metropolitan, Major, District town centre boundary, providing they are sensitively designed to protect and enhance the character of the Borough, particularly suburban areas.</p> <p>D. Windfall sites: Development of new housing on suitable sites (above 0.25ha), not identified within the Local Plan will be supported, provided it does not adversely impact the character of area, the existing and planned capacity of infrastructure and complies with other policies of the development Plan.</p>


Draft Plan Wording	Comments (additional text in red)
<b>Policy GR4: Building Heights</b>	
<p>A. Tall buildings are directed to designated tall building zones within the Harrow &amp; Wealdstone Opportunity Area. Within the Opportunity Area, a tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure).</p> <p>B. Proposals shall not exceed the appropriate building heights as set out within the designated tall buildings zones shown within the Policies Maps.</p> <p>C. The Council will restrict proposals for tall buildings outside the identified tall building zones.</p> <p>D. Outside of the Harrow &amp; Wealdstone Opportunity Area, there are no designated tall building zones. A tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building.</p>	<p>This policy does not take into account the strategic designed approach indorsed by Policy 01: High Quality Growth. Policy GR4 sets out a blanket approach which will sterilise the development opportunities of appropriate sites not situated within tall building zones. Accordingly, this policy should be amended as follows:</p> <p>A. Tall buildings are directed to designated tall building zones within the Harrow &amp; Wealdstone Opportunity Area. Within the Opportunity Area, a tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building (excluding necessary plant and roof infrastructure).</p> <p>B. Proposals shall not exceed the appropriate building heights as set out within the designated tall buildings zones shown within the Policies Maps.</p> <p>C. The Council will restrict proposals for tall buildings outside the identified tall building zones, <b>unless supporting evidence is submitted to demonstrate visual coherence with the surrounding character.</b></p>

	D. Outside of the Harrow & Wealdstone Opportunity Area, there are no designated tall building zones. A tall building is any building that is 7 storeys or 21m from the ground level to the highest point of the building.
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**Summary**

Kenton Road has been formally identified within Brent’s recently adopted plan as an area for intensification and growth. In alignment with this, Harrow’s evidence base and site allocation(s) prepared to indorse the draft plan provides a qualitative assessment of the opportunistic characteristics of the road, by way of its strategic positioning and sustainability qualities. However, the draft plan fails to appropriately identify and designate Kenton Road for intensification.

This representation therefore seeks amendments to strategic policies 01 (High Quality Growth), 03 (Meeting Harrow’s Housing Needs) and GR4 (Building Heights) to recognise and identify the opportunities and development capabilities of minor corridors, namely Kenton Road. A research study prepared by Autor Architecture Ltd is submitted in support of this representation and identifies the potential to materialise the re-imagining of the character of Kenton Road through a concurrent approach between the two authorities if an amendment Harrow’s draft policy wording is achieved.

I trust that the above is of assistance in the preparation of the replacement Local Plan. I would be grateful for confirmation of receipt of these representations and would welcome the opportunity to engage with further versions of the Local Plan in the future if relevant. If you have any queries or would like to discuss anything, please do not hesitate to get in contact with me or my colleague Luke Harrell 

Yours faithfully



**Ben Thomas**  
Director

# BUILDING ON THE BOUNDARIES

A research study for the  
intensification of Kenton  
Road

31.10.2024

For the submission to:  
London Borough of Harrow

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October 2024



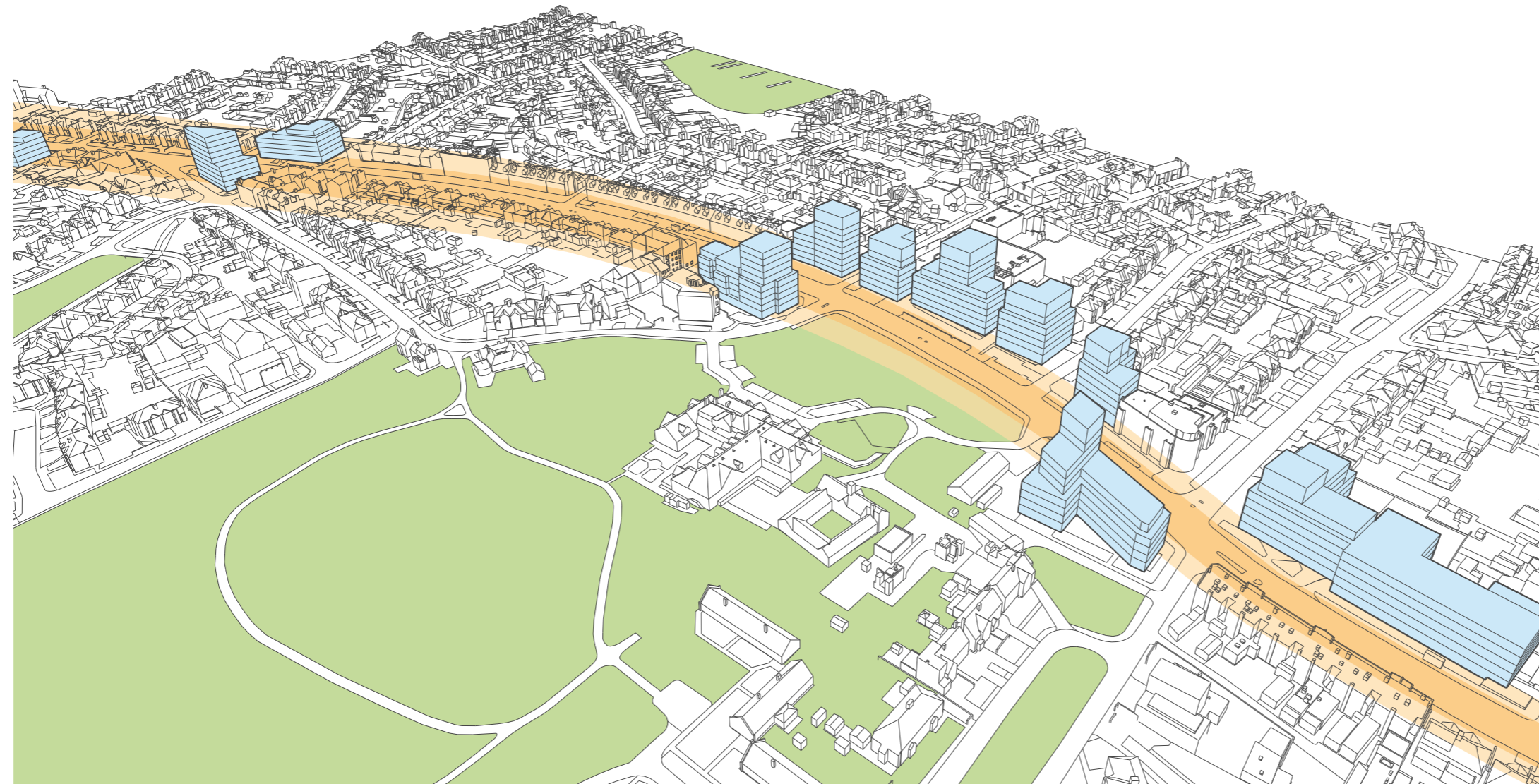
DOCUMENT PURPOSE

This document has been prepared on behalf of local land owner stakeholders, to enable a discussion between the London Boroughs of Harrow and Brent, who have both researched and independently identified Kenton Road as being suitable for intensification.

The goal is to demonstrate how the relevant policies of both Councils may materialise in re-imagining the character of Kenton Road, available sites for development, and the development potential including a significant number of housing and rejuvenated commercial space.

POTENTIAL

In summary, our research shows a potential 31 development opportunities on the road. Of these, we have selected those most suitable for a high level feasibility study, indicating the following potential:



01 Kenton Road development study

Commercial



**6000m2 OF NEW COMMERCIAL SPACE**

Housing



**450-550 NEW HOMES**

Amenity



**21Ha LOCALLY AVAILABLE**

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## 1.0 BACKGROUND

- 1.1 POLICY CONTEXT - BRENT
- 1.2 POLICY CONTEXT - HARROW
- 1.3 HISTORY OF KENTON ROAD
- 1.4 KENTON ROAD TODAY
- 1.5 SUMMARY

1.1 POLICY CONTEXT - BRENT

5 A4006 Kenton Road  
North West Place

**Mixed-use parade**

Parade could support intensification through either rooftop development or the redevelopment of the whole plot to a greater scale that relates to the width of the road and the prominent corner location. Redevelopment could also include the residential block on the adjacent plot.



**Non-residential blocks**

Non-residential blocks could support intensification through the redevelopment of either part of or the whole plot to a greater scale that relates to the width of the road and the prominent corner location.



**Residential block**

Residential block could support intensification through the redevelopment of the whole plot, including the mixed-use parade adjacent, to a transitional scale between the parade and the eastern semi-detached houses.



Image capture Apr 2019 ©2021 Google United Kingdom

- Terraced houses
- Semi-detached or detached houses
- Residential blocks
- Non-residential blocks
- Mixed-use parade (res and non-res)
- Empty site

46

Intensification Corridors - Local Plan Background Report

London Borough of Brent - January 2021

47

01 Brent intensification corridors report, Kenton Road

**DRAFT BRENT LOCAL PLAN**

**Intensification Corridors  
Local Plan Background Report**

January 2021



02 Brent intensification corridors report, cover

INTENSIFICATION CORRIDOR REPORT

In January 2021 Brent published a draft Local Plan background report, to assess the potential for Intensification Corridors Local Background Report.

This established the need for a step change in small sites housing delivery, requiring a proactive council approach to provide confidence to investors and enable the intensification of existing suburban housing stock.

Primary movement corridors were identified as potential sources for capacity, recognising that historically most settlements typically evolved along movement corridors associated with commerce, with a focal point either at or close to their intersections.

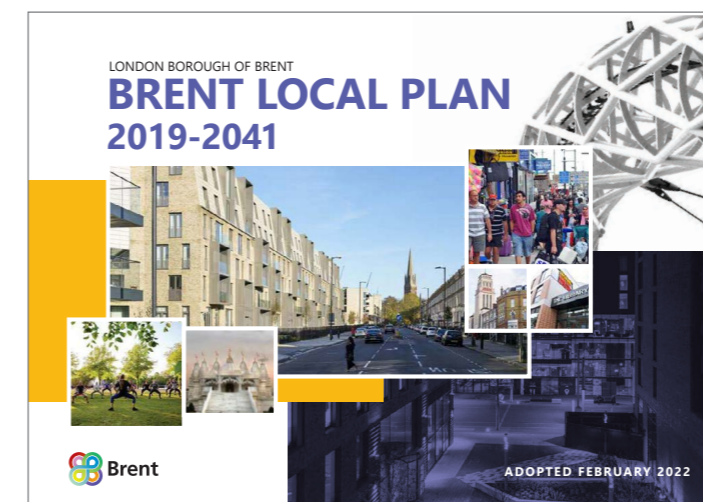
These were therefore considered logical areas for supporting intensification, with clear accessibility and legibility, whilst preserving the wider character of the majority of Brent's lower density suburban locations.

BRENT LOCAL PLAN 2019-2041

The findings of this report made their way into the adopted 2022 Brent Local Plan document and policy maps, with acknowledged support for smaller scale tall buildings ranging up to five storeys.

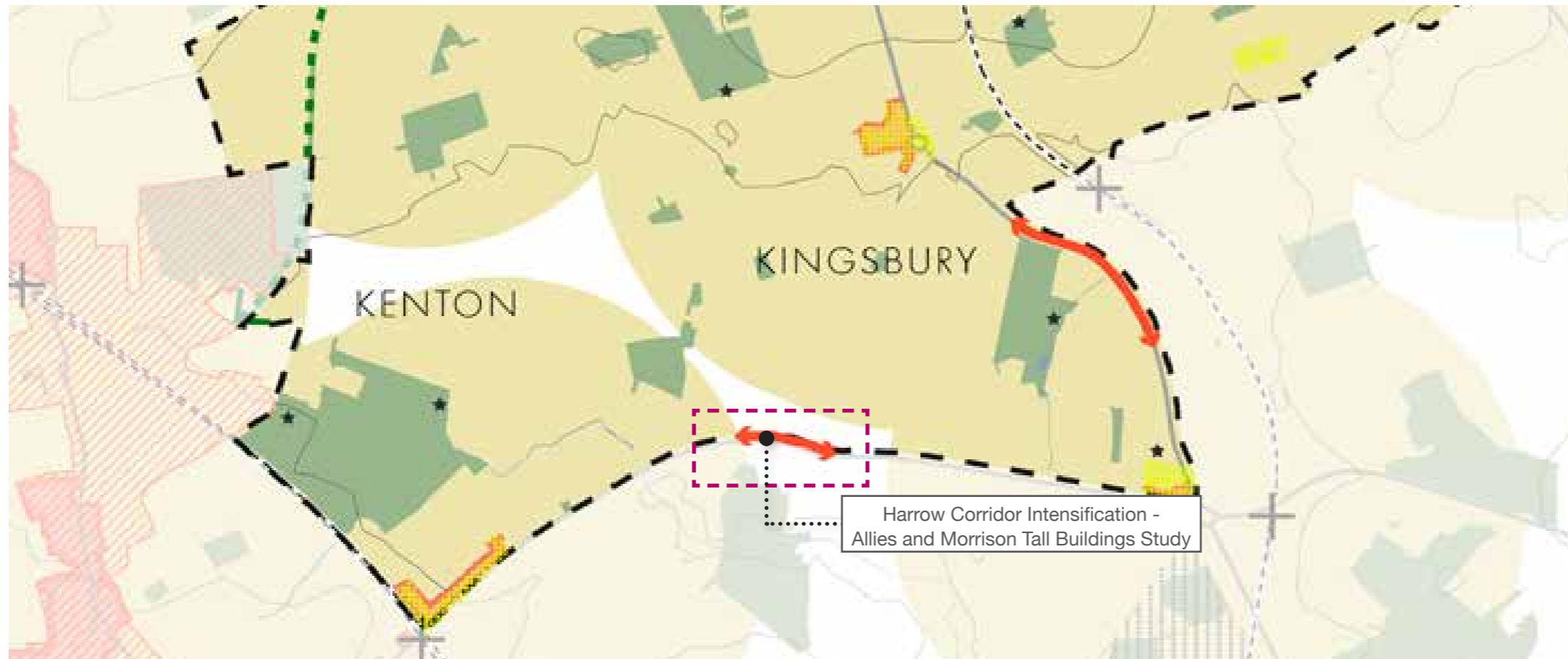


03 Brent policy map showing intensification corridor locations in orange



04 Brent local plan, cover





01 Harrow characterisation and tall buildings study extract, 2021

HARROW NEW LOCAL PLAN

Harrow is undergoing a process to publish a new local plan, currently at Regulation 18 stage.

As part of this process a number of supporting documents have been prepared, including a tall buildings study by Allies and Morrison.

TALL BUILDINGS STUDY & SPD

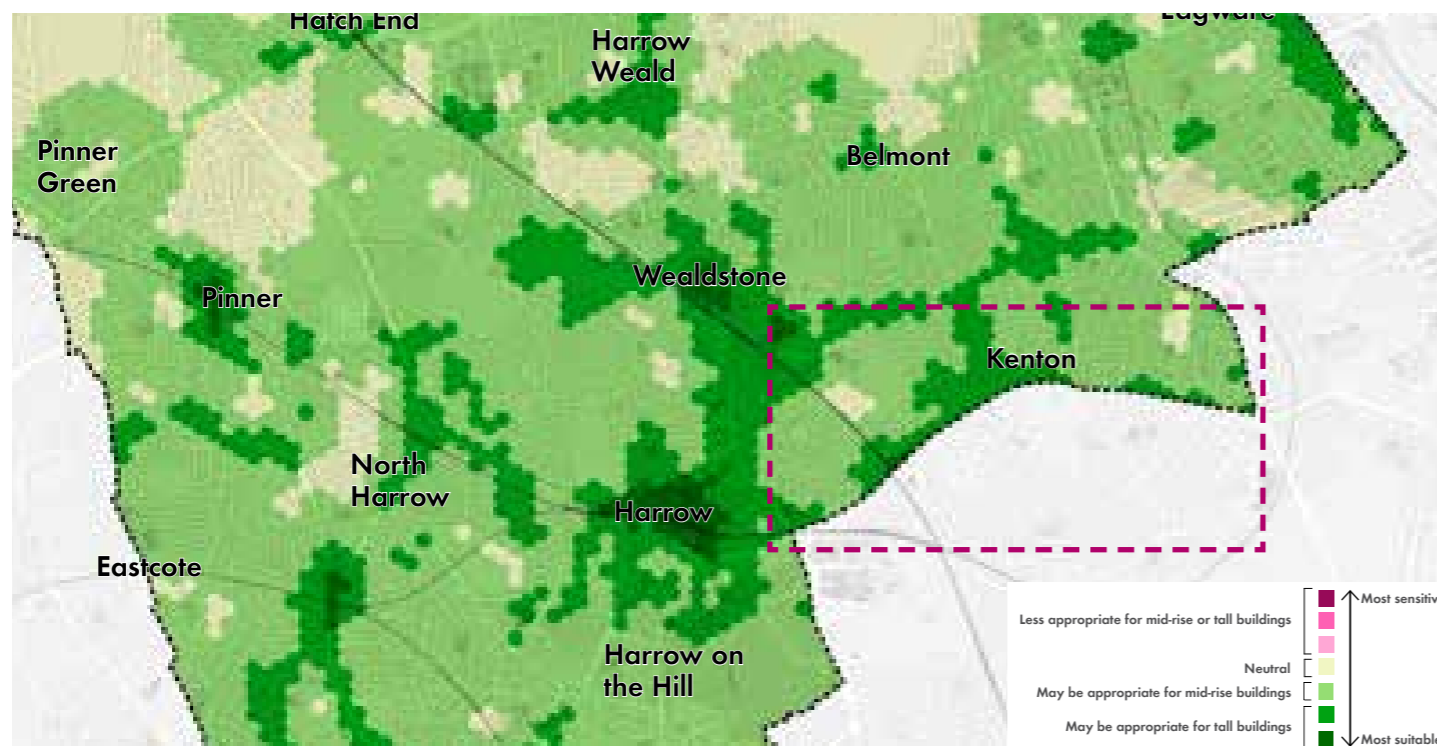
As part of the evidence base for the new Local Plan, Harrow commissioned Allies and Morrison to develop a borough-wide tall buildings and character study and methodology for assessing buildings proposing increased height.

This found sections of Kenton Road, highlighted in the adjacent plan, as most suitable and appropriate for tall buildings and that the area north of Kenton Grange may be 're imagined' to support intensification.

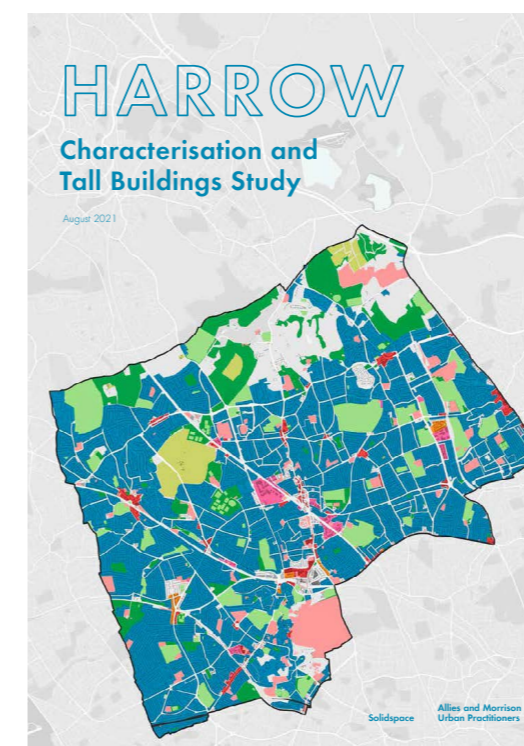
This research informed the Harrow 2023 Tall Buildings SPD. The methodologies contained within point to this location being suitable for intensified development.

JOINED UP APPROACH

In conclusion, it can be shown that Brent's adopted policies support intensification on Kenton Road, and that Harrow's initial evidence base and emerging policy recognises that Kenton Road is suitable for Intensification. A joined up approach would therefore be beneficial to both to make the most of the intensification opportunity.

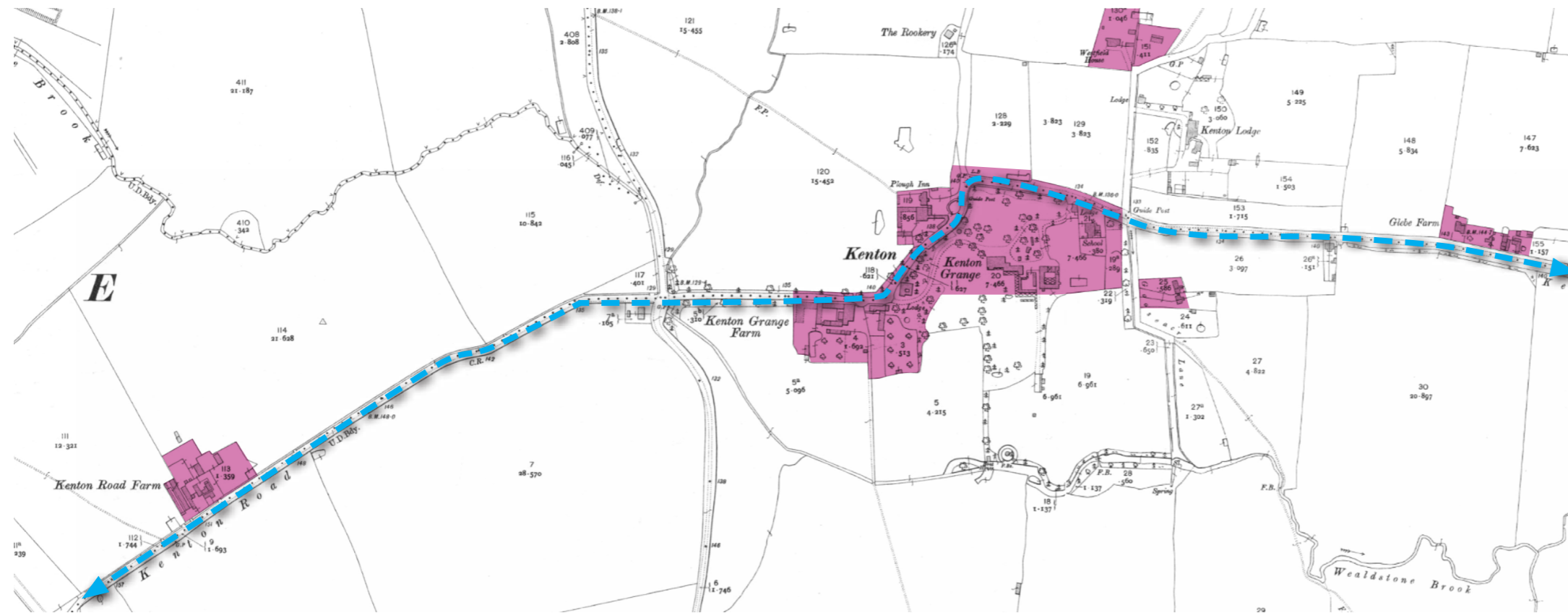


02 Suitability map for tall buildings (green = more suitable)



03 Harrow tall buildings study

### 1.3 HISTORY OF KENTON ROAD



#### PRE 20TH CENTURY

Kenton, originally known as 'Kenington', is a historical settlement thought to have originated in the Saxon era, with its first mention in 1231.

This local centre included amenities such as a blacksmith, public house, several cottages and estates, linking Kingsbury, Preston and Edgware.

#### 20TH CENTURY INTENSIFICATION

As shown in the adjacent 1914 historical map, key historical buildings retained their prominent positions, cementing Kenton Grange as a local centre.

During the 20th Century development across much of London's suburbs, Kenton and Kenton Grange formed the linchpin for the local centre to develop as a half way point between Kenton Station and Kingsbury Station, framing Woodcock Park.

01 1914 Historical Map

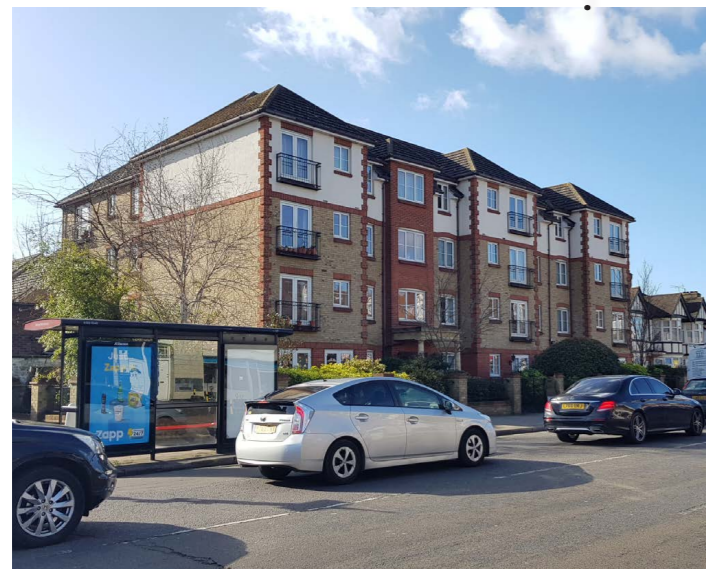


02 1934 Historical Map

## 1.4 KENTON ROAD TODAY



01 Kenton Grange local zone



02 Pegasus Court, 381 Kenton Road



03 Woodpark Court, 2 Woodgrange Avenue



04 Albany Court, 408-412 Kenton Road

### TODAY

Kenton Road has since developed to include an array of shops, religious and educational institutions, flatted developments and St Lukes Hospice, utilising the space left available after the metroland expansion, and through the assembly of smaller housing plots.

In particular, the centre of Kenton Road, Kenton Grange, acts as a local centre, differentiated by its larger plot sizes, scale of development and uses, predominantly flatted development, office, commercial and community/religious.

### LOOKING FORWARD

New developments adding height to existing buildings are forthcoming, enabled by permitted development rights.

Policy is also moving in the direction of a new wave of development. Brent has identified this road as an 'intensification corridor' with support for up to five storeys.

A character study by Harrow similarly found Kenton Road as one of the most suitable locations for intensification.

## 1.5 SUMMARY

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### SUMMARY

Kenton Road has been identified by both the London Boroughs of Harrow and Brent as a key area for development and intensification.

Brent's Local Plan 2019-2041, adopted in 2022, had already adopted Kenton Road as an 'intensification corridor' with support for increased height and density.

Harrow's 2023 Tall Buildings SPD and studies by Allies and Morrison further validate the road's suitability for redevelopment. These documents identify sections of Kenton Road, particularly around Kenton Grange, as ideal for taller buildings.

### NEXT CHAPTER

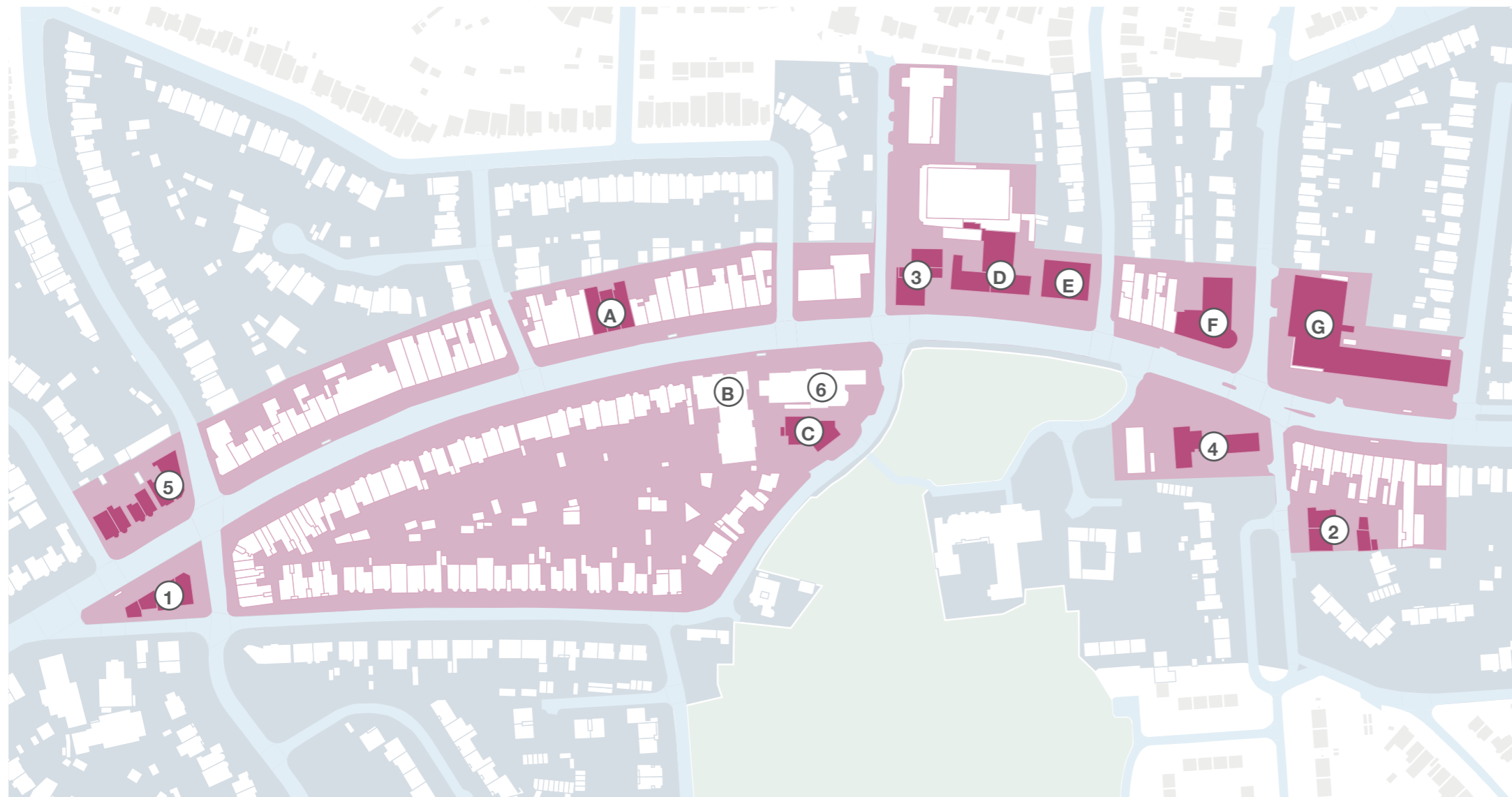
In the next chapter, we imagine how the intensification of Kenton Road may be realised, with key site studies to show a range of potential benefits such as new housing and commercial space, we're these to be realised.

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## 2.0 URBAN STRATEGY

- 2.1 IDENTIFIED SITES
- 2.2 URBAN PRINCIPLES
- 2.3 VISION
- 2.4 NEXT STEPS

2.1 IDENTIFIED SITES



01 Kenton Grange zone of potential

KENTON GRANGE SITES

Kenton Grange's historic nodal position has continued to today, with an increased scale compared to the wider area. An array of amenities serve the wider area, resulting in greater density and a higher proportion of flatted developments.

In addition there are various under utilised sites, which could form the basis for renewed developments, continuing Kenton Grange's role as a local centre.

These existing higher density buildings and potential development sites are identified in the adjacent diagram.

Existing Higher Density Buildings

- A Kenton Park Parade
- B Pegasus Court
- C Woodpark court
- D SKSS Temple & 390-394 Kenton Road
- E Dunwoody House
- F Albany Court
- G Stewart House

Potential Sites for Further Development

- 1 Cornwall Mansions
- 2 380-382 Kenton Road
- 3 Jet Garage
- 4 Kenton Road Flats
- 5 302-340 Kenton Road
- 6 Blue Ginger restaurant

KEY

- Existing High Density Zone
- Adjoining Suburban Development
- Woodcock Park
- Existing Buildings
- Potential Sites
- Initiator



01 Woodgrange Avenue potential

DEVELOPMENT PRINCIPLES

A local urban 'island' and park at Kenton Grange provide potential for development which will improve way finding and further enhance the legibility of Kenton Grange as a key corridor.

1: WOODGRANGE AVENUE

Woodgrange Avenue and Kenton Road form an urban island within the higher density parade.

To the West lies 319, 323 and Cornwall Mansions, highlighted in blue.

To the East lies Kenton Grange, which is framed by larger scale buildings..

Together these frame the entrance to the zone of higher density at Kenton Grange and represent an opportunity for two bookends of additional height.

2: KENTON GRANGE

Kenton Grange and the surrounding buildings have created a natural arch framing the park.

This presents an opportunity for increased density as a new defined park edge.

KEY

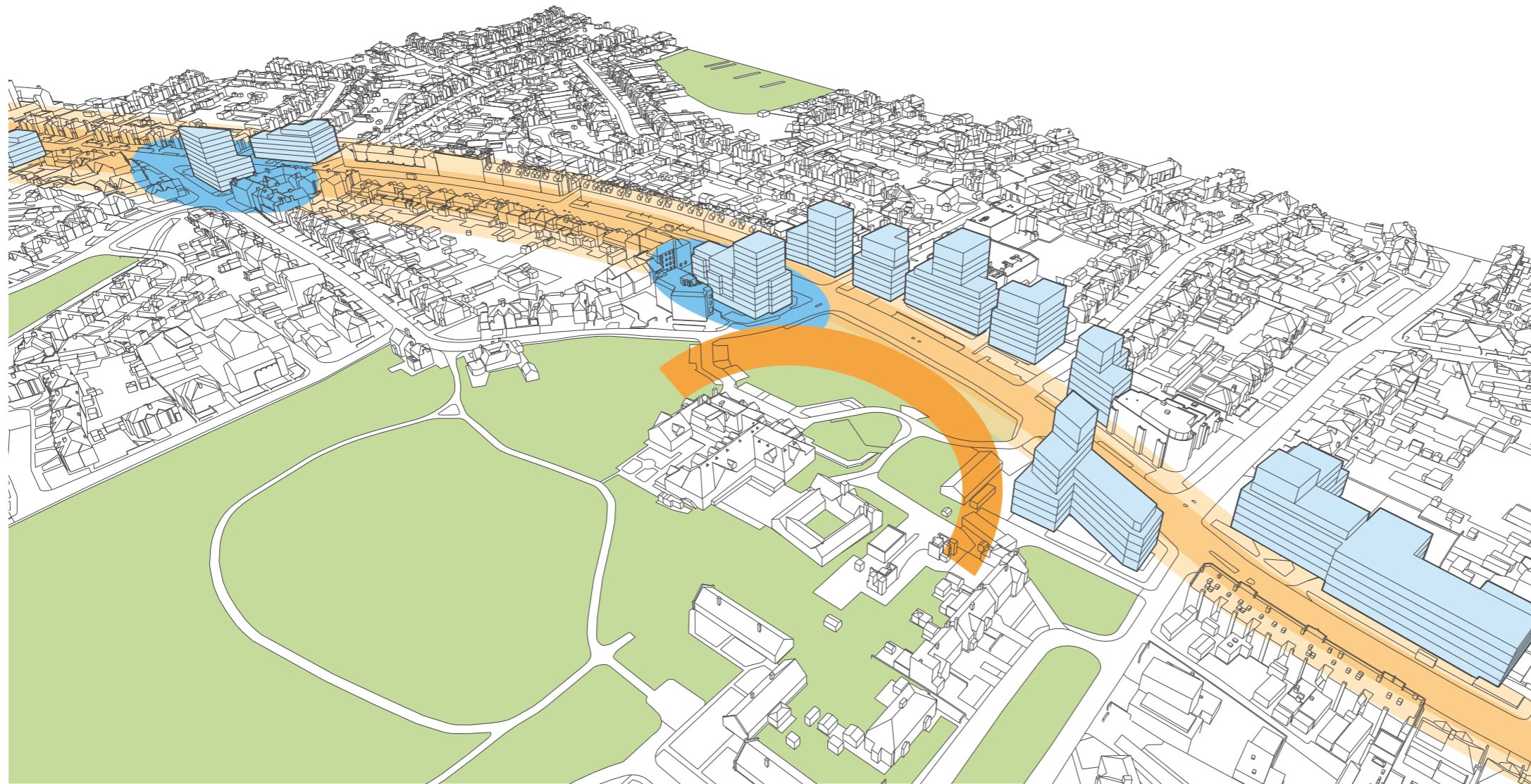
- Primary Development Potential
- Secondary Development Potential
- Initiator Sites Acting as Gateway
- New Park Edge

DEVELOPMENT STUDY

The adjacent diagram illustrates the potential direction of development at Kenton Grane and Woodgrange Avenue over the next decade.

383 Kenton Road, being positioned within two urban conditions, acts as an opportunity to catalyse future development as the historic inn first registered in 1751 catalysed today's development.

Our study of the area shows that, as well as revitalised ground floor commercial space, the area could accommodate 35,000-40,000m<sup>2</sup> of residential space, or 450-550 homes.



01 3D study of potential sites for development

**Commercial**



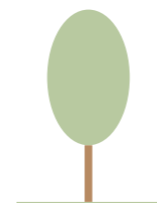
**6000m<sup>2</sup> OF NEW COMMERCIAL SPACE**

**Housing**



**450-550 NEW HOMES**

**Amenity**



**21Ha LOCALLY AVAILABLE**





01 Map of 31 identified sites on Kenton Road

#### DEVELOPMENT POTENTIAL

The alignment of Harrow and Brent's emerging and adopted policies, including Brent's designation of Kenton Road as an intensification corridor in the 2019-2041 Local Plan and Harrow's findings in the 2023 Tall Buildings SPD, confirms the suitability of this area for higher density development.

To supplement this, Autor have conducted an urban study to assess how these policies may be realised on Kenton Road, focused in particular on Kenton Grange, a local town centre.

This has shown the potential for a significant number or new homes and commercial space under a re imagined character for Kenton Road.

#### LANDOWNER ENGAGEMENT

Following the identification of development opportunities, direct outreach was conducted with the owners of the 31 identified sites, shown adjacent resulting in responses from three landowners.

One such site is now at pre application with Brent Council.

This initial engagement indicates a readiness among some stakeholders to explore redevelopment possibilities and highlights the importance of continued consultation.

#### A COLLABORATIVE APPROACH

Given the alignment of both councils' policies we propose the formation of a joint working group to facilitate regular dialogue, align planning frameworks, and engage with land owners and stakeholders to incentive development.

By working together, both Brent and Harrow can maximise the potential of this key corridor to deliver tangible gains that align with the need for more housing, especially from small sites, relieving pressure on the wider suburban pattern.



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**Quote: Greater London Authority - GLA**

*"It is clear that your office has spent considerable time in developing a formal and material design approach... your Design & Access Statement is one of the clearest I have reviewed in some time. I wish you every success and hope your client has been encouraged in their choice of architect."*

**Matthew Murphy**  
 Senior Design Advisor  
 Greater London Authority - Design for London

**Quote: London Borough of Harrow**

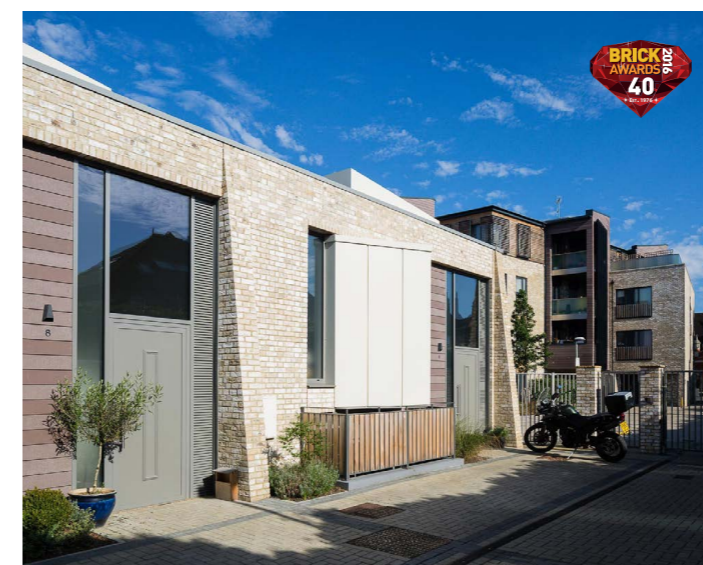
*"Officers considered that the development represented exemplary development and now encourage other developments coming forward to review this application."*

**Fergal O'Donnell**  
 Area Team Leader  
 London Borough of Harrow

**Quote: London Borough of Ealing**

*"The separate elements share a distinctive identity and have strong character, creating a sense of place, in accord with the design principles set out in: Better Places to Live."*

**Mary O'Rourke**  
 Appeal Inspector  
 The Planning Inspectorate



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