

**AVISON  
YOUNG**



# **Representations to the Proposed Submission Version of the Harrow Local Plan (Regulation 19 Consultation)**

Prepared on Behalf of Aldi Stores Ltd

December 2024

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Appendix I Site Location Plan

**Report title:** Reps to the Proposed Submission Version of the Harrow Local Plan (Reg 19 Consultation)

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**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1 These representations to the Harrow Local Plan (Regulation 19 Consultation) have been prepared by Avison Young on behalf of Aldi Stores Ltd (Aldi) in relation to the former National Grid site on Marsh Lane, Stanmore.
- 1.2 Representations were submitted on behalf of Aldi to the Call for Sites in April 2024, promoting the site for retail development and identifying the constraints that are associated with this site.
- 1.3 Two pre-application meetings have taken place with Officers at the London Borough of Harrow (LBH) to discuss the development of the site for retail purposes, initially in October 2022, with a further meeting taking place in October 2024.
- 1.4 In accordance with Paragraph 36 of the NPPF (December 2024) local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, where whether they are sound. Plans are “sound” if they are:
- Positively Prepared;
  - Justified;
  - Effective; and
  - Consistent with National Policy.
- 1.5 These representations will consider the allocation of Marsh Lane Gas Holders (Site Allocation O19) for residential development against these criteria.
- 1.6 Aldi welcome ongoing engagement and dialogue with the Council on the Local Plan as it moves forward.

## 2. Background

### The Site

- 2.1 The site extends to approximately 0.9 ha and is located on the eastern side of Marsh Lane (A4140) within the Stanmore area. A Site Location Plan (ref. 17938-100) is included at **Appendix 1**.
- 2.2 The site comprises an area of hardstanding following the removal of a number of gas holders and associated infrastructure, and a vacant, two-storey building which front the site along Marsh Lane to the west. The site is bound to the north and east by an area of trees and residential gardens of properties located on Wildcroft Gardens, Wychwood Avenue and Howberry Close respectively. To the south, an area of mature trees which form part of both Marsh Lane Park and the Stanmore Marsh (identified as a Site of Importance for Nature Conservation). To the west, the A4140 Marsh Lane runs parallel to the site.

### Surrounding Context

- 2.3 The site, whilst segregated, is situated within a predominately residential context, characterised by low-rise housing to the north, west and east of the site. Immediately south of the site lies Stanmore Marsh, with Whitchurch Primary School & Nursery and Avanti House Secondary School positioned to the south west. A small area of woodland separates the north-western portion of the site from Marsh Lane to the west.
- 2.4 The main vehicular access to the site is from Marsh Lane (A4140), with a secondary pedestrian and emergency vehicular access to rear of the site from Wychwood Avenue. Marsh Lane runs north to south connecting The Broadway/London Road (A410) and Whitchurch Lane (B461).
- 2.5 The site is situated approximately 950m (13 mins walk) southeast of Stanmore district centre, 1.4km north east of Belmont local centre and 1.6km north Queensbury local centre.

### Site Specific Designations

- 2.6 The site is not allocated for development in the adopted Local Plan but is subject to the following planning designations, which we assume will be carried forward (noting that there is no updated proposals map):
- Edgware and Burnt Oak Sub-Area;
  - Critical Drainage Area;
  - Flood Zone Surface Water FZ 3a and 3b (part); and
  - Protected Views Setting Corridor: Country Park at Wood Farm (applicable to the western half of the site only).
- 2.7 Immediately adjacent to the site are two identified areas of Designated Open Space to the north and south of the site, comprising Stanmore Marsh North. These areas are also identified as Sites of Importance for Nature Conservation. The areas comprise natural woodland, alongside some open

grassland and a children's play area. The site and the surroundings do not have any heritage assets, nor are there any Tree Preservation Orders.

## Pre-Application Feedback

### First Pre-Application (P/3619/22/PREAPP)

2.8 An initial pre-application submission was made to the LBH on the 22<sup>nd</sup> September 2022 and sought the Council's advice in relation to the erection of a discount food store and associated works. A meeting took place on the 24<sup>th</sup> January 2023, with the formal, written advice received on the 1<sup>st</sup> March 2023. The conclusion from the first submission is summarised below:

- *The proposed use would not be supported in principle given its out of town centre location.*
- *If the proposal is pursued, a sequential and exceptions test would be necessary to justify the use at this location.*
- *The Council would recommend a mixed-use scheme providing residential on site along with any commercial uses which optimises the potential of the site.*
- *The overall height and scale of the building in relation to the supermarket use would be appropriate. However, the design requires further detailing to add architectural interest.*
- *Given the height and siting of the single storey building it is likely to have a minimal impact on amenities of neighbouring residential properties.*
- *Further transport details outlined in this response along with tree protection and planting details are required as part of any future planning submission.*

### Second Pre-Application (October 2024)

2.9 Further to the submission of a request for a second pre-application meeting on 22<sup>nd</sup> July 2024, a meeting took place on 9<sup>th</sup> October 2024 and written feedback was received on 20<sup>th</sup> November 2024. The revised proposal for the site sought to address the issues and concerns as previously highlighted by the LBH as described above.

2.10 Since the first pre-application meeting, the Council have progressed with their Site Allocations DPD leading to the site having an emerging allocation. The following was received in the written response:

*"The site is proposed for allocation for housing in the new Local Plan Site allocations (Regulation 19 Version) (site ref O19) with an indicative residential capacity of 70 C3 dwellings. The proposed Site Allocation would carry a moderate amount of weight at this stage, noting that it is considered to be consistent with the NPPF and London Plan, as well as the Council's evidence base (namely the Harrow Economic Needs Study Town Centres and Office Update, 2024). The delivery of housing on this site would provide significant planning benefit and as such carry substantial weight should a scheme of this nature be considered.*

*In addition, a residential scheme or mixed-use scheme is considered to be a more efficient use of the site than the proposed single use as a retail store. On this basis and taking account of the regulation 19 site allocation, in the first instance the Council's priority is for the delivery of housing. However, a mixed-use*

*scheme optimising the site coverage could be considered (if the sequential and retail impact tests were passed). The applicant may wish to explore joint venture opportunities to take the above into account. The constraints of the site are acknowledged, however, there is currently no compelling evidence as to why any alternative mixed-use scheme could not be achieved if the principle of retail on the site was accepted based on evidence accompanying any formal application.”*

2.11 The following comments were received in respect of the proposed development:

- *The location of the building footprint on the site is supported as there is an appropriate offsetting distance between the building and Stanmore Marsh to the south and neighbouring rear gardens to the east and north-east.*
- *The proposed scale and massing of the built form are considered appropriate for the setting. Given the offsetting distances and height of the building, the proposal is unlikely to have any negative impact on the surrounding dwellings.*

2.12 Officers noted that it did not feel like the site was being optimised to its full extent, indicating that *“the site may be capable of taking additional height in certain locations which would allow residential units to be provided, adding density and making more effective use of land.”*

### 3. Site Allocation O19 – Marsh Lane Gas Holders

- 3.1 This section will consider the Council's proposed residential allocation of site O19 (Marsh Lane Gas Holders). At the outset it should be noted that there was no discussion with the landowner prior to the site being included as a residential site allocation within the Regulation 19 Consultation. This means that the site has been allocated without the Council having the benefit of understanding the site constraints that exist on the site or the existing ownership and access arrangements of the site which render it inappropriate for residential development.

#### The Principle of the Allocation

- 3.2 The site is allocated within the draft Local Plan for redevelopment purposes in order to deliver approximately 70 residential units over a 6 to 10 year timeframe, with the following identified development principles:

*"The site is a former gas holder site which has now been decommissioned with some ancillary infrastructure on the western boundary. Redevelopment of the site will need to have regard to any requirements associated with this infrastructure, including access easements (including a requirement for 24 hour 7-day-a-week access for heavy goods vehicles from Marsh Lane, as well as access from Wychwood Avenue) and a no build easement along the western boundary of the site.*

*The site is located within a generally suburban area, and therefore suitable for new residential development. New residential development should be delivered in a manner that relates sensitively to the wider area and provide a satisfactory level of carparking. Given the context of the site, it would be suitable for self-build housing provided this resulted in the efficient and optimal use of the site and met any requirements in relation to gas infrastructure.*

*Part of the site is subject to flood risk and therefore the design and layout of the site should have regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.*

*To the south of the site is Stanmore Marsh (with a small element to the west) which is a Site of Importance for Nature Conservation. All new development must be designed in a manner that addresses such a sensitive receiving environment in terms of light spill and other potential impacts on Stanmore Marsh.*

*New development should refer to the Harrow Tall Building (Building Heights) SPD 2023".*

- 3.3 As set out above there has been no consultation with the landowner prior to the site being included as a residential development site. The site allocation for residential development is not effective as it is not deliverable for residential development over the plan period. The site is currently in private ownership it is not justified to allocate a site with significant easement restrictions for self-build housing when the Council cannot demonstrate that the site will come forward and effectively deliver the objectives of the plan.
- 3.4 It is noted that when Troy Planning and Design undertook a Small Sites Capacity Study for the Council in October 2022 the Marsh Lane Gas Holders site was not identified. This Study sought to identify

potential small sites that might contribute towards meeting the Borough target for new homes, stating that:

*“In line with the London Plan, it should be emphasised that the key focus of this study is to assess the potential supply of sites and their capacity for housing in areas of intensification, which are locations with a PTAL of 3 – 6, within 800, of a station, or 800m of a town centre” (Page 1).*

3.5 It is noticeable that the Marsh Lane Gas Holders do not meet the criteria specified on behalf of the Council in research that was published in October 2022. The identification of the site for residential purposes is therefore not justified as it is not based on proportionate evidence, as it does not meet criteria specified by the Council to identify small sites.

3.6 The site allocation notes that:

*“Given the context of the site, it would be suitable for self-build housing provided this resulted in the efficient and optimal use of the site and met any requirements in relation to gas infrastructure”.*

3.7 In order to bring forward this site for self-build it would be necessary to install the necessary infrastructure, it is not possible to deliver self-build housing on the site due to the site constraints and the conflict in the Regulation 19 Consultation that is seeking a density of development on the site that would require a flatted development.

### Ability to Deliver Proposed Quantum of Residential Development

3.8 The Council have identified that the 0.88 ha site is capable of accommodating 70 residential units, this would lead to a residential density of 80 dwellings per hectare. The Small Sites Capacity Study prepared on behalf of the Council by Troy Planning and Design (October 2022) includes a simplified version of the London Plan Density Matrix used for initial estimates of site capacity. This is set out below at **Table 1** for reference. The site has a PTAL of 1b – 2, and the site is described as being in a suburban location. Therefore, based on the density matrix the site the site has been identified as a density that is more akin to the higher end of a suburban location with a PTAL of 2 to 3.

**Table 1 - London Plan Density Matrix**

Setting	PTAL		
	0 to 1	2 to 3	4 to 6
Suburban	35 – 75 du/ha	35 – 95 du/ha	45 – 130 du/ha
Urban	35 – 95 du/ha	45 – 170 du/ha	45 – 260 du/ha
Central	35 – 110 du/ha	65 – 240 du/ha	140 – 405 du/ha

Source: Table 1, Small Sites Capacity Study, LBH, October 2022

3.9 In order to deliver this quantum of development it would be necessary to consider a flatted development of circa three to four storeys. This conflicts with the identified development principles for the site which states:

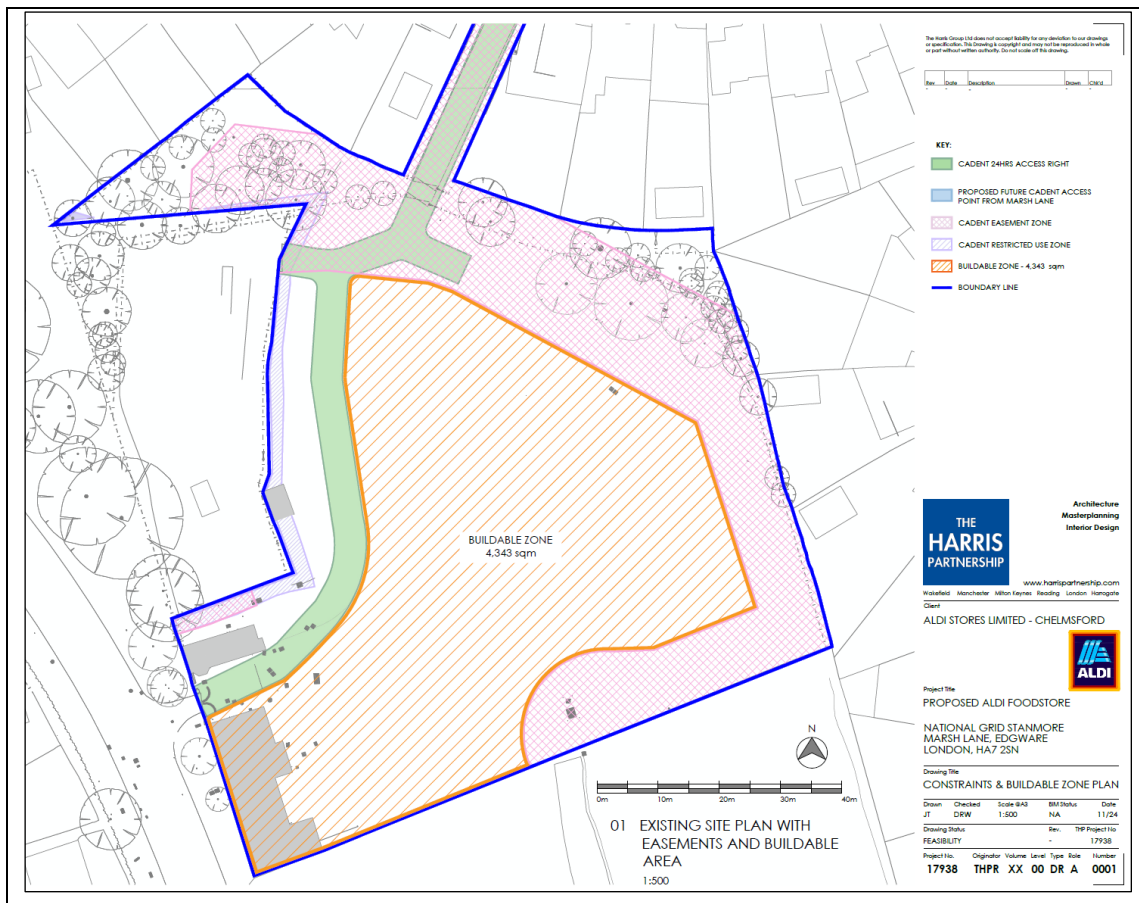


*“Given the context of the site, it would be suitable for self-build housing provided this resulted in the efficient and optimal use of the site and met any requirements in relation to gas infrastructure.”*

- 3.10 There is a clear conflict between the delivery of flatted development and self-build. The site allocation is not effective as it is not deliverable over the plan period as there are clear conflicts within the site allocation in terms of the quantum and type of residential development that the site has been allocated for.
- 3.11 The above is all calculated on the assumption of a site area of 0.88ha, as set out below this does not represent the true developable area of the site.

### Site Constraints

- 3.12 As part of the pre-application submission in January 2023, plans were submitted showing the easement to the east of the site in addition to the requirement to provide access to the infrastructure that is retained by Cadent. These constraints have not been acknowledged in the Regulation 19 Consultation. Therefore, the Regulation 19 Consultation is not justified as it is not based on a proportionate evidence base.
- 3.13 **Figure 1** (below) identifies the easement and access zones that relate to the site. The area of the site that can be developed is circa 0.43 ha (less than half of the site area assumed in the Regulation 19 Consultation).



**Figure 1** – Existing Site Plan Demonstrating the Existing Easement and ‘Buildable’ Area.

- 3.14 For clarity within the easement zones, Cadent are legally able to retain, lay, construct, inspect, maintain, protect, use, enlarge, replace, renew, remove or render unusable the gas pipes that run through this area.
- 3.15 Any owner of the site cannot construct any building, structure or permanent apparatus in the easement zones or cause any obstruction or material reduction of the depth of the soil. The following activities are permitted within this zone:
- Plant landscaping (albeit there are specific requirements with regard to the permitted planting);
  - Construct roads, cycleways, footpaths and parking areas; and
  - Install lighting and removeable street furniture, including street name plates, columns, bollards, bins and seats.
- 3.16 These parts of the site therefore cannot be used for built development and limits the type of landscaping in these areas. These parts of the site are not suitable for residential development (including amenity space or car parking) due to the access requirements of Cadent.

## Suitability for Residential Development

- 3.17 Notwithstanding the above, the site is not suitable for any form of residential development.
- 3.18 The site is currently in private ownership and is not available for residential development. Notwithstanding, without prejudice and for the avoidance of doubt taking into account the restrictions identified above regarding the development potential of the site, if the site were to be suitable for self-build properties there would be a requirement to install the necessary infrastructure to facilitate this, in addition it is unlikely to attract flatted development and maximise the development potential of the site. It is noted in in Appendix F: Assessment of Pre-Submission Local Plan Sites (London Borough of Harrow) that the Council would still expect to see affordable housing delivered on this site subject to viability testing.
- 3.19 As set out above there are restrictions around the requirement to provide access to the site and also no-build zones. Provision for and access to these areas would need to be available round the clock, therefore, these areas could not be used for purposes ancillary to residential development (for example car parking or amenity space). The overall developable area of the site is therefore limited by virtue of these restrictions as set out above.
- 3.20 Whilst the site is adjacent to residential uses, due to its historic use and development of the site it does not provide a natural extension to the existing residential uses, this is compounded by the no-build zones, which would result in isolated residential development.
- 3.21 In Appendix F: Assessment of Pre-Submission Local Plan Sites (London Borough of Harrow) which accompanies the Regulation 19 Consultation, the following minor negative points are identified in terms of the proposed residential allocation:
- The site does not make provision of employment space or retail / town centre uses, nor does it lie in close proximity to a town centre. The development of this site is subsequently unlikely to benefit the local economy.

- An existing EV charger is over 600m of the site. The site subsequently does not support the shift to EV vehicles. Policy CN2: Energy Infrastructure requires the provision of EV chargers on site; however this requirement is dependent on car parking being proposed. As the site does not appear to provide car parking a potential minor negative effect is identified.
- The site lies on land classified as 'urban' and is a mixture of brownfield and greenfield land. Development of the site would likely lead to a small portion of greenspace land being lost. The site is not within a groundwater protection zone or a historic landfill site. However, the historic use of the site as a gas holders may have potential contamination issues that require remediation. The nearest water course (Silk Stream and Edgware Brook) is 300m from the site, suggesting that water pollution as a result of construction may occur without appropriate site mitigation. However, Local Plan Policy CN4 Sustainable Drainage requires major development to ensure appropriate best practice is followed with respect to the control of water pollution. Therefore, a potential minor negative is identified.

3.22 As set out above the site is not suitable for any form of residential development. Allocating the site for residential development is not effective and would therefore lead to a plan which is unsound.

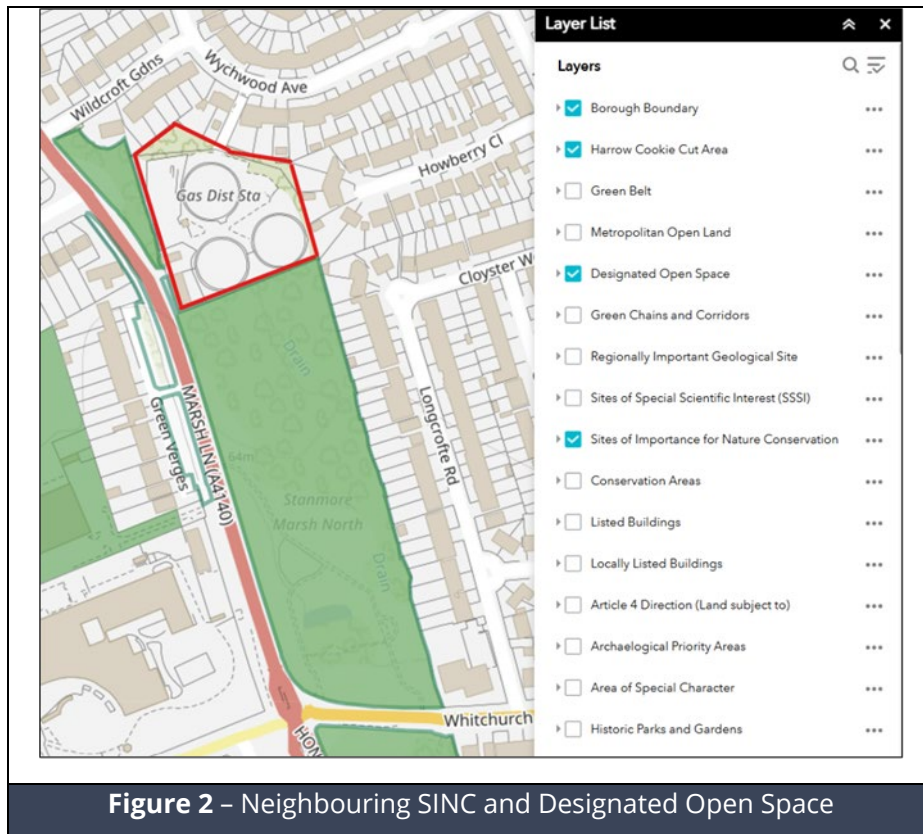
## Site Availability and Timescales

3.23 The effectiveness of the allocation is dependent on whether the land will be made available for development over the plan period, as this determines whether the allocation is deliverable. As previously indicated the Council has not discussed the site allocation with the landowner and therefore the allocation is not justified as it is not based on proportionate evidence due to these lack of discussions and understanding of the wider situation regarding the site.

3.24 The site is currently vacant and, as detailed previously, Aldi has been in discussions with the Council regarding the development of the site for retail purposes since October 2022. The site is not available for residential development within the identified 6 to 10 year timescale and therefore the allocation of the site is unsound.

## Nature Reserve

3.25 As shown by **Figure 2** below, the neighbouring SINC and Designated Open Space land is shown to be adjacent to the development site.



**Figure 2 – Neighbouring SINC and Designated Open Space**

3.26 In considering this proximity as part of the site assessment in Appendix F: Assessment of Pre-Submission Local Plan Sites (London Borough of Harrow) the assessment finds that:

*“The site does not lie within close proximity to an SSSI or SSSI risk zone, TPO, or RIG. The site does intersect a SINC. Policy G13 Biodiversity provides mitigation as it highlights that any loss of biodiversity must be avoided through the development of this site, and provide 15% biodiversity net gain. Therefore, a neutral effect is identified”.*

3.27 The site allocation specifically notes that:

*“To the south of the site is Stanmore Marsh (with a small element to the west) which is a Site of Importance for Nature Conservation. All new development must be designed in a manner that addresses such a sensitive receiving environment in terms of light spill and other potential impacts on Stanmore Marsh”.*

### Appropriate Height of Development

3.28 The site allocation makes reference to the need to refer to the Harrow Tall Building (Building Heights) SPD 2023, a summary of the considerations set out in this document and how they refer to this site are set out below. As set out above there is a lack of consistency in the proposed density (which can only be delivered through flatted development) and the intention to allocate the site for self-build housing.

3.29 The Site is located within the Canons Park Neighbourhood Area as designated by the Harrow Tall Buildings SPD and lists the following building heights:

- Prevailing Height: 2 storeys

- Contextually High Building: Less than 4 storeys
- Tall Building London Plan Policy D9: 6 storeys/ 18 metres

3.30 As acknowledged, the borough applies a contextual building height analysis as demonstrated by **Figure 3** below. The prevailing height of the surrounding area of Marsh Lane are two storey detached / semi-detached residential properties and is acknowledged as being suburban in character. Based on the Council’s own formula, the maximum height of a building that could come forward in this location would therefore be four storeys in height.

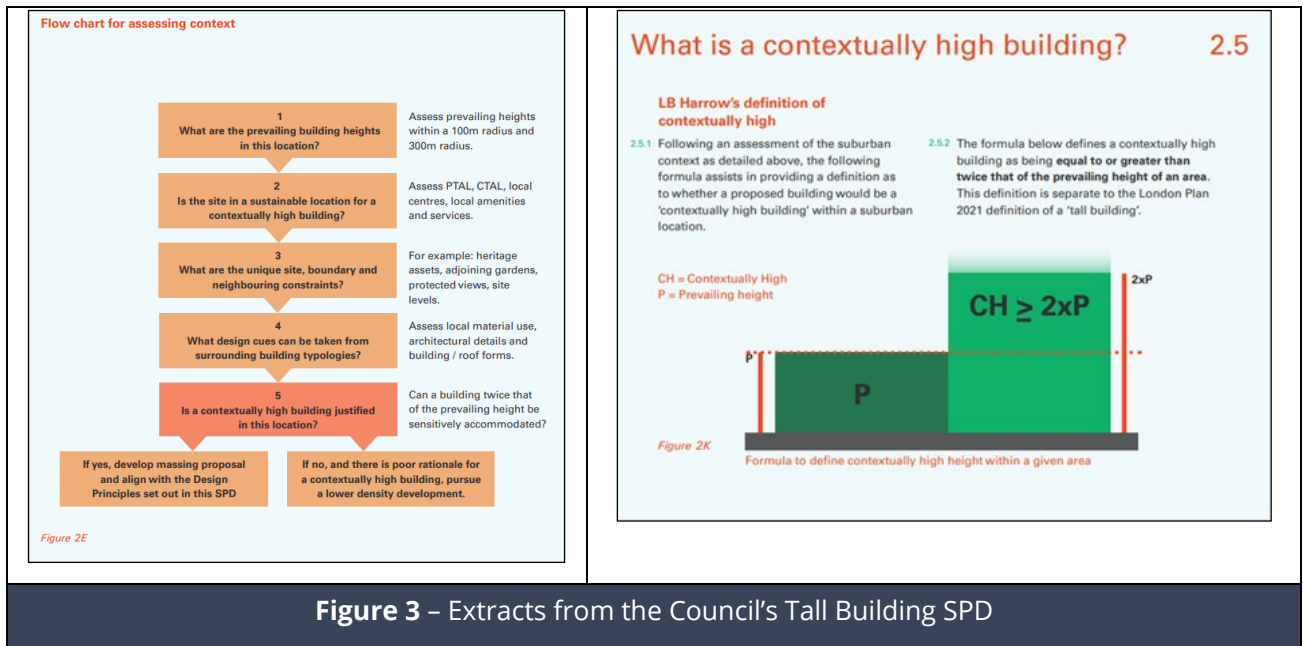


Figure 3 – Extracts from the Council’s Tall Building SPD

3.31 If the whole site were available for development, a site density of 80 units per hectare could be achieved through the use of a flatted development however, the following points should be considered:

- The whole site is not available for development (due to easements and access rights), the residential target could not be delivered on the site in accordance with the Harrow Tall Building (Building Heights) SPD 2023; and
- The Site Allocations identifies that the site may be suitable for self-build housing which would not comprise flatted development.

## Summary

3.32 In this section we have identified that the site is not suitable for residential development, allocating the site for residential development would mean that the plan is unsound as it would not be effective as it would be deliverable over the plan period.

3.33 As set out above, there are clear constraints to the development of the site, the residential allocation is not justified as it is not based on a proportionate evidence base and therefore the plan is unsound.

## 4. Appropriateness of Retail Development

- 4.1 The Council published an Economic Needs Study Town Centres and Office Update (ENSTCOU) in January 2024. The site is located within Zone 4 (Harrow Northeast). As set out in **Table 2** there is capacity for additional convenience goods floorspace within this zone. Paragraph 7.16 notes that *“the capacity projections for convenience goods retail floorspace in the north of the Borough (zones 3 and 4) relates to population growth, which suggests some new small scale facilities could be supported by housing developments in this area.”*

**Table 2 - Convenience goods floorspace capacity 2026 to 2036 Zone 4 Harrow Northeast**

	2026	2031	2036
Turnover density new floorspace (£ per sq m)	£12,361	£12,398	£12,398
Floorspace capacity (sq m net)	1,104	1,307	1,490
Floorspace capacity (sq m gross)	1,577	1,868	2,129

Source: Table 12, Appendix 3 Economic Needs Study Town Centres and Office Update (January 2024)

- 4.2 There is no reference to commitments within the ENSTCOU or suggested site allocations to accommodate the additional retail floorspace.

### Sequential Site Search

- 4.3 **Policy LE1** (Development Principles and Town Centre Hierarchy) of the Regulation 19 consultation states that proposals for new retail development in out of centre locations will be resisted, subject to undertaking a sequential test to demonstrate that there are no appropriate town centre sites, followed by edge of centre sites, be supported by an Impact Assessment and a Travel Plan.
- 4.4 On the basis that the Site is out-of-centre, we have undertaken an initial desk based sequential assessment to identify any potentially sequentially preferable sites that are suitable and available for the proposed development. **Figure 4** (below) identifies the location of the site and identified centres both within the London Borough of Harrow and adjacent authorities. The nearest centre to the Site is Stanmore district centre, located 900m northwest.
- 4.5 Based on an approximate 5-minute drive time (**Figure 5**) (circa 2 miles), the site is located within the catchment area of Edgware (Major Centre), Stanmore (District Centre), Queensbury (Local Centre) and Belmont (Local Centre). There are also a number of Neighbourhood Shopping Parades that lie within this catchment area, including Whitchurch Lane and Honeypot Lane to the south.

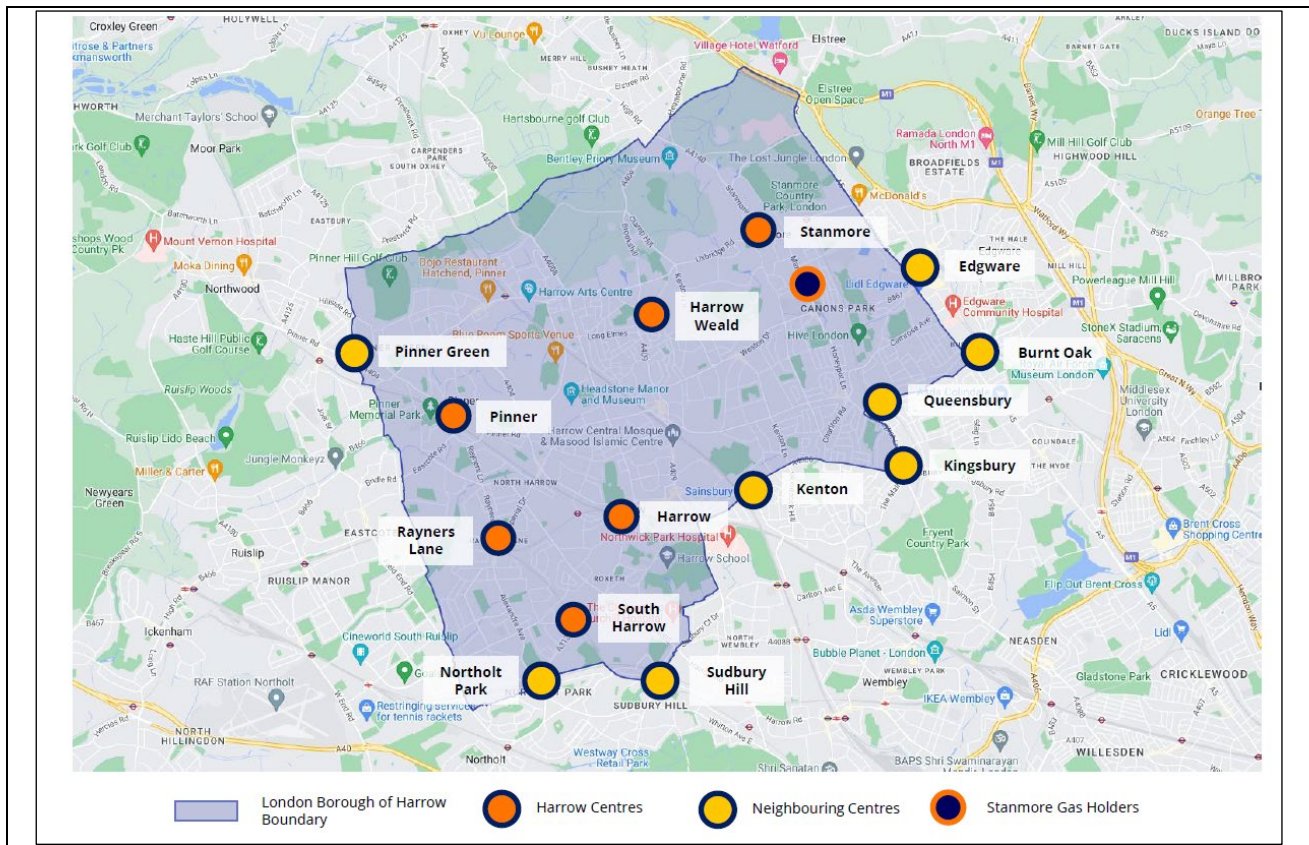


Figure 4 – Harrow Existing and Neighbouring Centres (Source – Avison Young)



Figure 5 – Five-Minute Drive Time (Source – Avison Young)

4.6 Whilst capacity for additional convenience floorspace was identified in the ENSTCOU no specific sites that could accommodate this development were identified. **Table 3** (below) provides a summary of sites identified within the Regulation 19 Consultation that include reference to the development of retail floorspace.

**Table 3 - Summary of Site Allocations including retail development**

Site Reference and Address	Site Area	Site Objective	Development Timeframe
<b>Opportunity Area Sites</b>			
OA2 – Harrow on the Hill Underground and Bus Stations	1.10 ha	Redevelopment of the site to provide a landmark / wayfinding development that will deliver housing, town centre uses and an enhanced public transport hub. An enhanced transport hub must deliver greater accessibility (including step free access from the southern entrance of the train station) and ensure transportation capacity is met over the plan period.	Phased development in 6 – 10 and 11 – 15 year periods.
OA3 – 15 – 29 College Road	0.38 ha	Re-development of residential and town centre uses which improves the public realm fronting onto College Road and the interface with the public realm at the rear of the site	11 – 15 years
OA5 – Station Road East, Harrow	0.88 ha	Redevelopment to provide a comprehensive and efficient use of land delivering housing and appropriate town centre uses.	6 – 10 years
OA15 – Iceland, Wealdstone	0.22 ha	Mixed-use residential and retail development within Wealdstone Town Centre	1 – 5 years
OA16 - Kodak	15.00 ha	Comprehensive mixed-use site development which optimises capacity of site while delivering a broad range of necessary infrastructure and land uses.	1 – 5 years
<b>Other Sites</b>			
O1 – Waitrose, South Harrow	1.57 ha	Redevelopment to provide the re-provision of supermarket with residential development.	11 – 15 years
O2 – Roxeth Library and Clinic	0.13 ha	Mixed use development which improves the utilisation of this currently low-density town-centre site	11 – 15 years
O7 – Rayners Lane Station Carpark	0.85 ha	Mixed-use development which improves access to Rayners Lane Station, while retaining or re-providing a sufficient level of car parking	6 – 10 years
O11 – North Harrow Methodist Church	0.34 ha	Enabling mixed-use development facilitating replacement or enhancement of existing church and community facilities.  In retail policy terms, the site is located outside of the North Harrow district centre boundary but is	11 – 15 years



Site Reference and Address	Site Area	Site Objective	Development Timeframe
		within 300m of the centre's secondary shopping frontage, and the site should therefore be treated as being 'edge of centre'. It is suitable for redevelopment to multiple small retail units, or for a single convenience goods retailer such as a discount food outlet.	
O21 – Anmer Lodge	1.37 ha	Mixed-use development of this under-utilised town centre site which includes a supermarket as well as a suitable level of residential use, while re-providing an appropriate level of car parking.	1 -5 years

- 4.7 Site allocation O11 (North Harrow Methodist Church) specifically makes reference to the sites ability to provide for a single convenience goods retailer such as a discount food outlet, with an 11 – 15 timeframe. This does not meet the requirement for additional convenience goods floorspace that has been identified now.
- 4.8 Of the other sites identified these comprise redevelopment of existing facilities, where the existing tenant is expected to remain in situ, in any event no redevelopment plans exist for these sites and are not available within a reasonable period of time.
- 4.9 In pre-application discussions reference has been made to Anmer Site (Site O21) which comprises an allocation for a mixed-use development to include a supermarket and circa 141 residential units with a development timeframe of 1 – 5 years. Planning permission was granted in August 2014 to provide a supermarket of 1,692 sq m (gross) and 120 residential units along with associated works. In the 10 years since this permission was granted this development has not been delivered. It is understood that Marks and Spencer were to be the occupier of the convenience store, but they have since withdrawn from the scheme.
- 4.10 Planning permission was granted for the development of the Anmer Lodge Site on 22 August 2014 (application reference P/0412/14). Since this time as set out in **Table 4** (below), submissions have been made in relation to the discharge of conditions along with S96A and S73 applications.

**Table 4 - Anmer Lodge Planning History**

Application Reference	Description of Development	Date of Decision
P/0412/14	Redevelopment of Anmer Lodge & Stanmore car park site in four blocks of various heights: block a to provide 1,692 sq. m (gross) food retail store (class a1) with ancillary café and 3-5 storeys of flats over; block b to provide multi storey car park and 3-4 storeys of flats over; block c to comprise 3-6 storeys of flats with undercroft parking; block d to comprise 2-4 storeys of houses and flats with surface car parking. basement car park below blocks a & b. total 120 dwellings (class c3) (resident permit restricted); 294 car parking spaces (comprising 151 replacement spaces, 50 spaces for the food store and 93 spaces for residents), 8 motorcycle spaces and 144 cycle spaces. Access from Dennis Lane and Coverdale Close. proposal also includes combined heat & power plant; landscaping & roof gardens; diversion of water culvert;	22 August 2014

Application Reference	Description of Development	Date of Decision
	works to provide temporary replacement town centre car park (minimum of 151 spaces) and demolition of Anmer Lodge	
P/1738/17	Discharge of Condition 13	09 June 2017
P/1761/17	Discharge of Condition 14	13 June 2017
P/2324/17	Discharge of Condition 46	26 June 2017
P/2667/17	Discharge of Condition 20	26 June 2017
P/2447/17	Discharge of Condition 32	26 June 2017
P/2387/17	Discharge of Condition 23 Part A	17 July 2017
P/3684/17	NMA to allow rewording of Condition 23 (Drainage)	06 September 2017
P/4221/18	Variation of Condition 48 to alter layout and access of the temporary car park.	18 March 2019
P/0784/19	Discharge of Condition 26	11 April 2019
P/0712/19	Discharge of Condition 22	11 April 2019
P/0585/19	Discharge of Condition 25	12 June 2019
P/1662/19	NMA amendments to car park layout, commercial lift and ventilation shaft.	05 June 2020

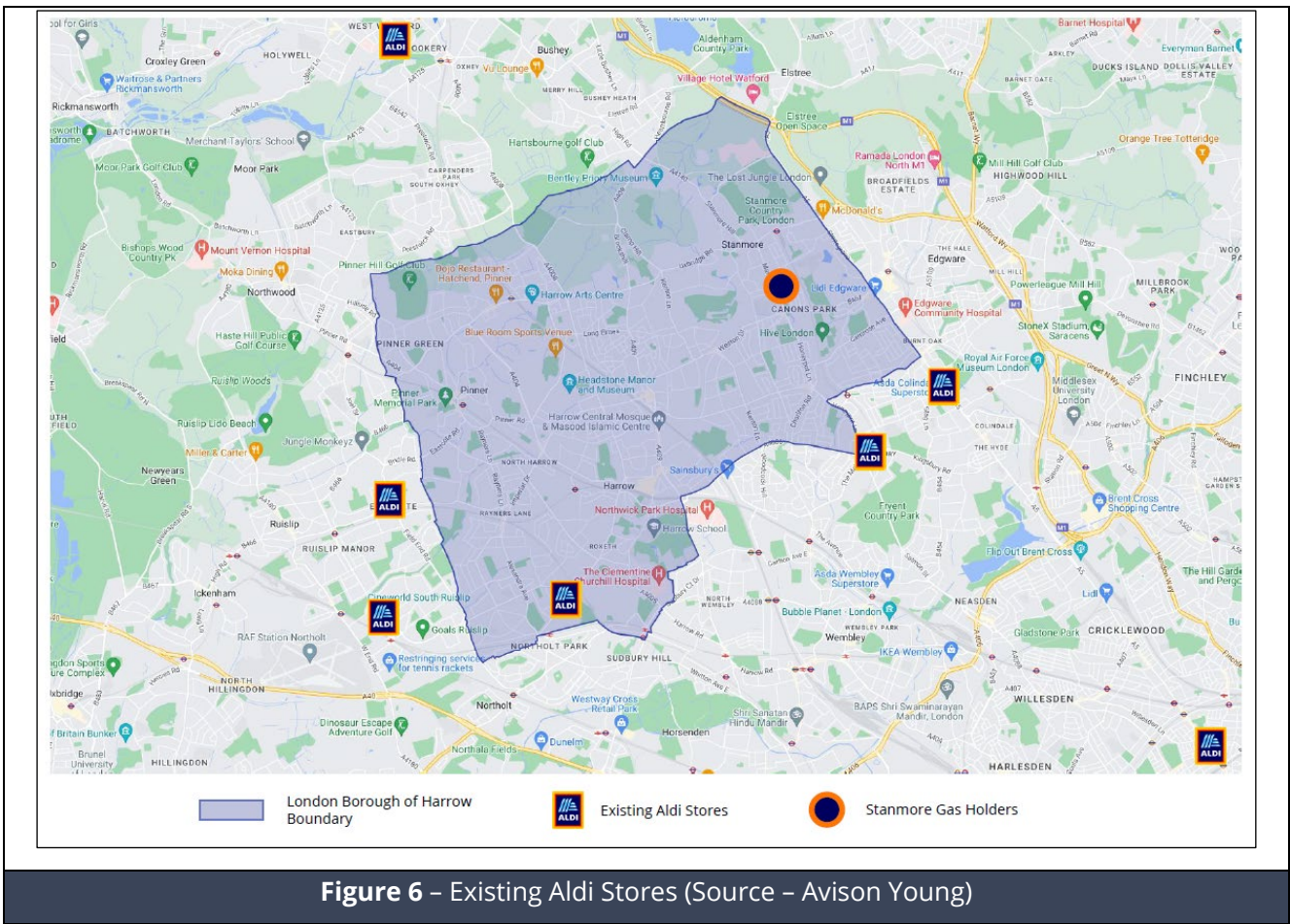
4.11 In the excess of ten years since the permission was granted the development has not been brought forward. It is understood that the consent has been implemented as set out below:

*“A number of pre-commencement conditions have been approved, the former Anmer Lodge building has been demolished, enabling works have been undertaken and the temporary car park has been constructed. The planning permission has therefore been implemented”.* (Paragraph 2.2, Planning Committee Report for application P/4221/18 dated 21 November 2018).

4.12 It is noteworthy that the Council’s Economic Needs Study Town Centres and Office Update (January 2024) prepared by Lichfields does not include any reference to commitments or the consented Anmer Lodge scheme in considering the need for additional convenience goods floorspace.

## Benefits of Retail Development

4.13 There is currently only one Aldi store located within the London Borough of Harrow (South Harrow). **Figure 6** (below) identifies the Aldi stores that are located within the Borough and adjacent authorities.



- 4.14 The Household Survey that underpins the ENSTCOU is not available and therefore it is not possible to identify expenditure that is flowing out of the borough to Aldi stores elsewhere. Anecdotally we are aware that residents of the borough visit the store at Watford.
- 4.15 Allocating the site for retail development will have a number of benefits, which have been acknowledged by the Council in the assessment of the sites within the Regulation 19 Consultation. Appendix F: Assessment of Pre-Submission Local Plan Sites (London Borough of Harrow) assess each of the identified sites against specified objectives.

**Economy**

- 4.16 The specified objective is:  
*“To deliver economic growth and support the creation of new business, whilst supporting the growth and retention of existing businesses”.*
- 4.17 The Assessment notes that:  
*“The site does not make provision for employment space or retail / town centre uses, nor does it lie in close proximity to a town centre. The development of this site is subsequently unlikely to benefit the local economy. Therefore, a potential minor negative effect is identified”.*
- 4.18 The following mitigation is suggested:

*“Provision should be made on or near the site for retail / town centre uses, in order to provide some benefits to the local economy”.*

- 4.19 The allocation of the site for retail development would benefit the local economy and also provide for retail uses in an accessible location to existing, residential communities in order to provide benefits to the local economy.

## Employment

- 4.20 The specified objective is:

*“To create greater employment opportunities and higher value jobs for all ages across the whole borough”.*

- 4.21 The following assessment is made in relation to the site:

*“The site is located around 700m from an employment site, allowing residents of the site to access employment opportunities. As the site is located in an area of medium deprivation, provision of employment opportunities could subsequently also improve rates of deprivation in the area. The site does not make provision for employment space or retail / town centre uses however. Therefore, a potential minor positive effect is identified”. (Emphasis Added)*

- 4.22 Noting that the site is located in an area of medium deprivation the provision of accessible and varied employment opportunities in this location will provide wider economic benefits. Each store represents a minimum of £7 million in the local economy and creates up to 40 new FTE jobs. There is a focus on local recruitment with a majority of staff employed living within 1 mile of a store.

## Summary

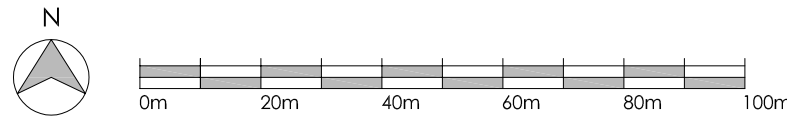
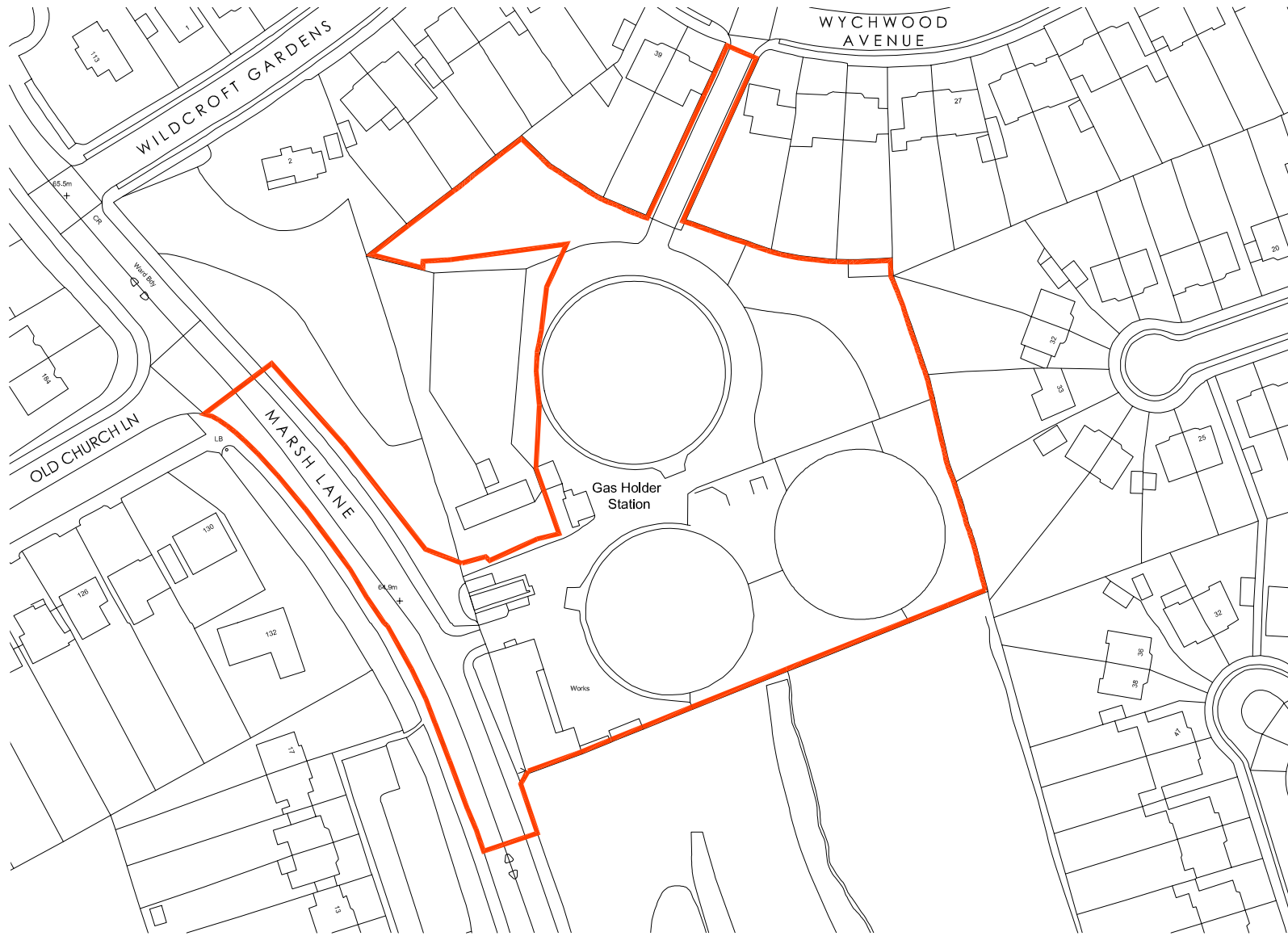
- 4.23 This section has undertaken a sequential site assessment taking into account the sites identified within the Regulation 19 Consultation and concluded that there are no sites that are deliverable and capable of meeting the floorspace capacity identified in the ENSTCOU. Given the delays associated with the delivery of the redevelopment of Anmer Lodge (approved over ten years ago), this is not considered to be a site that is going to be deliverable and meet the immediate need for additional convenience goods floorspace that has been identified.
- 4.24 In addition, the proposed development will deliver economic and employment benefits and assist the Council in meeting objectives around economic activity and employment creation.
- 4.25 In summary therefore, there are no sequentially preferable sites identified within the Regulation 19 consultation that are suitable or available for the development of a discount food store. Therefore, in order to meet the recognised need for additional convenience goods floorspace in the north-eastern part of Harrow, the Gas Holders site should be allocated for retail development, there is an identified occupier who can deliver the scheme within a year of planning permission being granted helping to bring this vacant and derelict site back into an active and purposeful use and to contribute to the wider economy.

## 5. Conclusion

- 5.1 The proposed site allocation is unsound as it has not been robustly justified and is not evidence led and will not be effective. A residential development on the site will not be delivered during the plan period and therefore the plan is not effective. The land is in private ownership and is owned by Aldi who are progressing with a retail development on this site.
- 5.2 These representations have set out why the site is not suitable for residential development and how it will not be delivered during the plan period for this use. The proposed allocation of the site for retail development will bring about economic investment and employment creation within an area that has been identified as being an area of medium deprivation.
- 5.3 Aldi welcomes ongoing engagement and dialogue with the Council on the Local Plan as it moves forward through to its formal designation and adoption.

# Appendix I

## Site Location Plan



**01 SITE LOCATION PLAN**  
1:1250

Rev	Date	Description	Rev By	Chk'd By
-	dd-mm-yy		-	-



Project Title	PROPOSED ALDI FOODSTORE NATIONAL GRID STANMORE MARSH LANE EDGWARE LONDON HA7 2SN			
Client	ALDI STORES LIMITED - CHELMSFORD			
Status	PRE-APPLICATION			
Scale	1:1250	Drawing Size	A4	
Date	03/10/2022	Drawn By	DRW	Chkd by DRW
Drawing Title	SITE LOCATION PLAN			
Job-Dwg No	17938-100			Rev -

- 2 St. Johns North, Wakefield, WF1 3QA t. 01924 291800
- Carvers Warehouse, 77 Dale Street, Manchester, M1 2HG t. 0161 2388555
- The Old Rectory, 79 High Street, Newport Pagnell, MK16 8AB t. 01908 211377
- 101 London Road, Reading, RG1 5BY t. 0118 9507700
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