



Planning Department
Harrow Council
Civic Centre
Station Road
Harrow
HA1 2XY

Dear Sir/Madam

**FORMER ROYAL MAIL SORTING OFFICE, ELMGROVE ROAD, HARROW, HA1 2ED:
PROPOSED SITE ALLOCATION REPRESENTATION – SITE ALLOCATION OA8**

We write to you on behalf of our client, Harrow Troy Limited, to make a representation as part of the Regulation 19 consultation on the amended local plan.

In April 2024 we made a submission as part of the Call for Sites Consultation on behalf of our client (the owner of the above site). The site has since been included in the proposed submission version of the Harrow Local Plan Site Allocations 'Site OA8 - Former Royal Mail Sorting Office, Elmgrove Road'.

A template for the site sets out the type and mix of development proposed, planning constraints, design considerations and delivery timeframes.

Please find below our observations and comments regarding the scope and suitability of the potential development on the site.

Residential co-location

The site allocation notes that the 'Site Objective' is - '*Redevelopment to retain and enhance industrial/employment floorspace on the site with potential for co-location with residential on the upper floors*'

As detailed in the Call for Sites submission the redevelopment of the site would support the introduction of residential accommodation. Having regard to the 'Development Principles' it is agreed that given the site's location within the Harrow & Wealdstone opportunity area and near the Harrow Town Centre it is suitable for a modest scale residential/industrial co-location development.

Residential Capacity

The allocation suggests the re-provision of appropriate industrial employment space on the ground floor of development with an indicative residential capacity (C3) of 18 (housing contribution 20).

It is considered that the extent of the site presents a greater opportunity to support both the local and national housing need and that whilst indicative, 18 residential units would not make effective or efficient use of the available site.

Under new planning rules, updated via the National Planning Policy Framework (NPPF), councils are required to play their part in meeting housing need by reaching a new ambitious combined target of 370,000 homes a year. The new NPPF has had significant implications on housing targets and outlines a new target of 2294 new homes within LB Harrow.

The Prime Minister and Secretary of State for Housing have been honest about the scale of the housing crisis with the Government now being 'mission-led', taking the bold and decisive action needed to do what it takes to build 1.5 million new homes over the next five years.

It is considered that any development should seek to fully utilise the economic viability of the site with a view to maximising capacity, this would ensure that the project was financially viable whilst better supporting the Council in meeting its housing targets.

As detailed at paragraph 73 of the NPPF 'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly'.

The number of units this site can accommodate should therefore be reviewed and maximised to make the best use of the site.

Having been considered suitable for a mixed use/residential scheme a future development would also be achievable as the site remains immediately available and could deliver housing within the next five years.

Future Development and Design

Whilst it is noted that the non-designated industrial sites makes an important contribution to employment and industrial land supply in Harrow and London and that a sufficient provision of appropriate employment land is provided, maintaining this former and existing use (industrial floorspace) in part on the ground floor would need to be carefully considered. The existing uses on the site are appropriate in a residential area. It would be necessary to ensure that the associated activities can be accommodated alongside residential units, mitigating any associated impacts in order to maintain residential amenity.

A detailed design process would consider the access and amenity of surrounding properties. The wider area surrounding the site is characterised by a mix of uses so it is considered that a suitable design would mitigate any potential impacts. The residential developments of Havilland and Watson House are situated to the west of the site and there are further residential dwellings located to the south. The Crystal Centre is located to the northeast of the site and provides light industrial and retail warehousing units.

SUMMARY

In summary, we support the residential co-location with the reprovision of appropriate industrial employment space on the ground floor but consider the indicative residential capacity too low.

It remains the fact that the site is suitable, available and deliverable for a mixed used/ residential development.

We respectfully request that this site be reassessed by the Council with a view to increasing the residential units achievable on this site as part of the forthcoming Local Plan.

We trust that the above information will be taken into account when considering the site. However, if you have any queries regarding this matter please don't hesitate to contact me on the details at the top of this letter.

Yours faithfully

