



HTA Design LLP
75 Wallis Road
London E9 5LN



FOA Planning Policy Team
Harrow Council
278 Station Road
Harrow
HA1 2XH
By Email: local.plan@harrow.gov.uk

Chair:
Benjamin Derbyshire
Dip Arch Cantab PPRIBA FRSA

Managing Partner:
Simon Bayliss
MA Dip Arch Dip UD

Partners:
Mike De'Ath
BA (Hons) Dip Arch RIBA FRSA
Colin Ainger
BA (Hons)
Caroline Dove
MA (Hons) Dip Arch RIBA
Sandy Morrison
B Arch RIBA
James Lord
BA (Hons) BLA CMLI
Rory Bergin
B Arch MSc
Lucy Smith
BA (Hons) MSc
Dr Riette Oosthuizen
BA (Hons) MA PhD
Simon Toplis
MA Dip Arch
Tim Crowther
BA (Hons) B Arch RIBA
John Gray
B Arch (Hons) Dip Arch RIBA
John Nsiah
BSc (Hons) Dip Arch

Director:
Rajiv Ranjan
B Eng MBA

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Dear Sir/ Madam,

Re: Representations on Harrow's New Local Plan Regulation 19 Consultation

HTA Design LLP (HTA) has been instructed on behalf of our client, Tide Construction, to provide comments on the Draft New Harrow Local Plan – Proposed Submission Version (Regulation 19), which was published for consultation on 4th November 2024.

We welcome the opportunity to provide comments on the New Harrow Local Plan, which forms a key part of the emerging planning policy position for Harrow, defining key areas for growth within the London Borough of Harrow ('LBH') over the next 15-20 years.

Our client owns land known as Queens House Car Park, located on Kymberley Road, Harrow, HA1 1YH ('the Site'), and is seeking to bring forward the Site for comprehensive redevelopment for a new co-living scheme in the heart of Harrow Town Centre.

We have previously provided comments on the Draft Local Plan at Regulation 18 stage and submitted an accompanying Call for Sites for the comprehensive redevelopment of the Site for c.466 new co-living homes. This has culminated in the Site being allocated for residential-led redevelopment in the Reg 19 Draft Local Plan (Site Allocation OA1), which is welcomed.

The Regulation 19 stage consultation offers an opportunity to provide feedback on the submission version of The Plan. Our review assesses the plan against relevant legal tests to ensure that defined policy is sound and stands up to scrutiny at the Examination in Public. In particular, our comments focus on the following draft policies:

- Site Allocation OA1
- Policy HO9: Large Scale Purpose Built and Conversions for Shared Living
- Policy GI3: Biodiversity

We request a further opportunity to discuss these representations in detail with the LBH Planning Policy team to support suitable amendments to the aforementioned policies in the submitted version of the Local Plan and strengthen the soundness of the current policies.

Tide Construction

Tide Construction Limited is a development and contracting company with an unrivalled track record in the delivery of projects using their accredited off-site manufacturing system – Vision Volumetric.

Harrow's New Local Plan Regulation 19 Consultation

These projects are substantially quicker to build than conventional construction schemes, often resulting in a 50% or greater time saving on programme and a 40% reduction in embodied energy compared to a traditional construction.

Vision Volumetric is based in Bedford with 180 staff operating from a 180,000ft² facility. Vision's fast track method of construction has proven benefits in quality, safety and sustainability as the modules arrive to site fully fitted and watertight.

It offers superior technical benefits to traditional and other forms of construction in the areas of sound, airtightness, thermal performance, fire, structure, waste and sustainability.

Tests of Soundness

Our comments and policy assessment are framed by the NPPF (2024) 'tests of soundness' which help to ensure the deliverability of the emerging policy. Local Plans are required to meet the following soundness tests:

- Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

The tests of soundness should be applied in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.

Proposed Site Allocation OA1

The Site has been allocated for redevelopment under site allocation OA1 within Chapter 11 of the submission version of the plan. We support the principle of including the Site as a development site and it is important that the Council demonstrates how the Local Plan will meet a range of development needs. Crucially, sufficient sites and suitable capacity need to be identified to meet these needs in order for the plan to meet the 'tests of soundness'

The objectives of the Site have been defined by the proposed policy as a mixed-use development that provides high quality residential homes and appropriate town centre uses in the Harrow Metropolitan Town Centre, while ensuring a satisfactory reprovision of car parking spaces. In addition, the proposed policy wording states that new development will improve the quality of the character of the area and enhance the public realm and local connectivity.

The predominant land use defined within the policy wording is residential (Use Class C3), with supporting land uses defined as Town centre appropriate uses and the reprovision of car parking spaces.

The defined development principles confirm that the site is appropriate for tall building, with consideration of the two protected viewing corridors which the site sits within.

Emerging Development Proposals

Tide Construction has held positive pre-application engagement with LBH since January 2023 regarding the emerging development proposals for the Site and is working collaboratively with the Council to develop a sound strategy for the delivery of the Site. The principle of development of a high-density co-living scheme has been supported by the LBH planning team. Detailed discussions around matters including heritage and townscape, the design strategy for taller buildings, landscape and transport matters have informed the emerging proposals. Feedback has been gained from LBH Officers, the GLA, Harrow's Design Review Panel and Harrows Planning Policy Advisory Panel. It has been recognised that the removal of parking element is critical to unlocking the potential of the Site, which has a PTAL level of 6b and therefore benefits from excellent public transport connections.

Parking Reprovision

The GLA has stated that the comprehensive redevelopment of this site to provide large-scale shared living could be supported in strategic planning terms given the highly accessible town centre location. However, they noted that the overall design proposals presented at pre-app stage have been significantly compromised by the

reprovision of the town centre car parking, with reprovision not supported in strategic transport terms. The GLA has requested that our client and LPA explore how a reduction in the quantum of car parking can be achieved, given the Site's town centre location and existing availability of car parking within the vicinity.

Tide Construction have commissioned a Transport Assessment Scoping Report, which has found that Queens House remains an underused public car park with a vacancy rate of 65%, reflecting its limited role in the context of wider town centre parking within Harrow. The Sites' accessibility to public transport and connectivity to the wider town centre is a key consideration, and the requirement in the proposed site allocation for the reprovision of an underused car park is not in line with strategic planning policy, introducing a restrictive requirement.

The Scoping Report demonstrates that if public/leased car parking were to be removed from the Site, the existing nearby Greenhill Way and Davey House Car Parks location in the Town Centre will still be able to maintain a worst-case or 'peak' occupancy level of 84%. This is within the 85% target set out within the 'Harrow Parking Management and Enforcement Strategy' (2019).

In line with the pre-application feedback from the GLA and the findings of the scoping report, we wish to re-emphasise how the current site allocation wording places an excessive restriction in requiring reprovision of car parking, limiting the optimal capacity and deliverability of the Site for the provision of new much-needed housing. The proposed allocation wording should be amended to remove the requirement for parking re-provision, this requirement cannot be justified in the context of strategic planning policy, placing a disproportionate constraint on the redevelopment of the Site.

The NPPF 2024 places an emphasis on optimising the density of development in town centres and locations that are well served by public transport. There is no clear or compelling justification for including the reprovision of car parking as a requirement. The approach would significantly restrict the optimisation of the Site Allocation. The proposed reprovision should be deleted from the allocation wording to ensure consistency with national policy.

Residential Uses

The proposed site allocation details an indicative residential capacity of 129 homes (Use Class C3). It is unclear how this development capacity has been calculated by the LPA. Design strategies discussed with the LPA through the pre-application process have been based on a co-living scheme as opposed to a conventional C3 residential use, capable of delivering c.466 units.

Analysis has been undertaken and presented at pre-application meetings demonstrating why the site is more appropriate for co-living over traditional residential (Use Class C3). The key challenges of delivering traditional housing at the Site include the creation of a lower quality layout with a high proportion of single aspect homes. On-site amenity space would be compromised by a traditional form of housing in terms of location, quality, and usability. As an alternative, co-living is an efficient means of delivering high quality space, making it an excellent fit for town centre locations that require high-density housing solutions. Co-living also helps foster new communities, and will strengthen Harrow town centre, placing new residents on the doorsteps of local shops and restaurants.

Co-living housing is a large-scale purpose-built shared living offer suitable for high-density design solutions and is therefore well placed to deliver new accommodation on the proposed Site Allocation OA1, which includes a designation for a tall building within the defined design principles.

Co-living has emerged as a global trend which responds to several inter-related issues facing an increasingly urbanised population, covering, affordability, sustainability, urban loneliness, and changes in lifestyles. Co-living has the following common characteristics; an internal community where people choose to share space, smaller homes in exchange for larger shared high-quality provisions and a more communal and connected lifestyle and convenient lease terms with flexible arrangements that can accommodate changes in residents' circumstances.

The emerging development proposals for the Site are set within a highly sustainable location, which aligns with London Plan Policy H16 and the spatial strategy for growth in the Local Plan, prioritising accessible town centre locations, which would not contribute to car dependency. The approach reflects the key priorities of the NPPF, with substantial weight applied to the value of using suitable brownfield land within settlements for homes and identified needs. The site allocation should be amended to positively plan for co-living, reflecting the potential for delivering a co-living scheme on site, providing flexibility under the defined land use definitions and amending the defined indicative site capacity to reflect pre-application capacity studies and the extensive engagement undertaken with the LPA.

Policy H09: Large Scale Purpose Built and Conversions for Shared Living

The policy is unsound in its current form, and has not been positively prepared, introducing significant limitations on Large Scale Purpose Built and Conversions for Shared Living. The current policy wording is not consistent with

Harrow's New Local Plan Regulation 19 Consultation

London Plan Policy H16 and recently published Large-Scale Purpose-Built Shared Living London Plan Guidance (February 2024).

Policy H09 outlines that proposals for Large-Scale Purpose-Built Shared Living (LSPBSL) will be supported where they comply with London Plan Policy H16 and defines a set of new policy requirements which must also be met. Our assessment of the proposed policy is focused on criteria a, b, c, d and g.

We support the inclusion of policy specifically supporting the delivery of LSPBSL, which includes co-living housing, in the Borough. However, it is critical that the proposed policy requirements do not impose unnecessary limitations on delivery but ensure the most efficient use of available brownfield land within the Borough, in line with the aspirations of the NPPF (2024) and London Plan (2021). The current policy wording is not consistent with national and regional planning policy in this regard and is therefore considered unsound.

Specifically, criteria a) of Draft Policy H09 requires all proposals to demonstrate how they are meeting an identified local housing need based on local incomes, rent levels and existing/ future demographics of the Borough.

London Plan policy H16 does not require Applicants to demonstrate how proposals meet housing need. It is also not a requirement of the London Plan LSPBSL LPG published earlier this year.

The proposed requirement to demonstrate need is not justified. The policy should be amended to remove this onerous obligation. LBH should instead positively plan for co-living development, establishing how this can be beneficial to overall housing delivery and choice, particularly within sustainable Town Centre locations.

Co-living, as a form of rental housing, can play a significant role in freeing up established traditional housing stock, particularly family sized housing. New co-living schemes provide a purpose-built, professionally managed, high-quality alternative to HMO accommodation for sharers. Co-living schemes also create the benefit of providing Private Rental Sector ('PRS') sharers with more choice within the Borough, freeing up HMO stock for those seeking low-cost housing or allowing for conversions back to family homes.

Criteria b) of Policy H09 requires Applicants to demonstrate the affordability of the proposed offer within the scheme compared with alternative products within the Borough's private rental sector. Firstly, it should be recognised that co-living is an alternative form of housing with a payment in lieu required for affordable housing. It is not defined as an affordable product and should be treated no differently in policy terms to other forms of private rental housing.

Co-living provides residents with flexible rental arrangements with reduced upfront costs, including deposits and furnishing costs. Our client has commissioned research into local demand for co-living within Harrow as part of the ongoing pre-application process for the Site with the LPA. This has demonstrated that co-living provides good quality, purpose-built accommodation that is affordable compared with other PRS property types, offering good value for money. Once all costs are considered, there is evidence to suggest that Harrow's existing co-living developments operate with a 12% lower overall cost to residents than traditional new build studio comparisons and 20% less than like for like tenants living in Build to Rent (BTR) properties in the Borough. Criteria b) of Draft Policy H09 should be brought into alignment with relevant criteria set out in Policy H16 and any reference to affordability deleted prior to submission for examination.

Criteria c) of Draft Policy H09 requires proposals to be located within the boundaries of Harrow Metropolitan Centre and Wealdstone District Centre (with a PTAL of 5-6), which form part of the London Plan Opportunity Area. We support the principle of this part of the policy in driving new purpose built and conversions for shared living to the most sustainable locations within the Borough. This will in turn help support the ongoing revitalisation of the town centre, bringing residents into the heart of Harrow. The proposed approach of this part of the draft policy meets the relevant requirements of London Plan Policy H16 (Part A3), and positively responds to the new London Plan guidance on the locational and access considerations for LSPBSL development and is therefore supported.

In particular, this proposed policy approach supports the proposed redevelopment of our client's site, which would see co-living development come forward in a highly sustainable location with excellent public transport connections and a PTAL level of 6b, supporting development within a defined area for regeneration and intensification within the Harrow and Wealdstone Opportunity Area.

Criteria d) of Draft Policy H09 outlines that there must not be two LSPBSL schemes within a 250m walking distance of each other to avoid an over-concentration of similar uses. Applicants will be required to demonstrate exceptional circumstances and provide robust evidence addressing several criteria to justify a departure from this requirement.

We recognise that this policy position is informed by the new GLA LSPBSL LPG and is focused on ensuring the delivery of mixed and inclusive neighbourhoods that don't create an overconcentration of certain housing typologies. However, new guidance states that ideally, Local Plans should identify where spatial or delivery

Harrow's New Local Plan Regulation 19 Consultation

concentrations of LSPBSL (relative to conventional housing) may be emerging and impacting the ability to ensure mixed and inclusive neighbourhoods. Critically, the LPG is clear in stating that any policy should be sufficiently flexible to ensure any limits are not applied arbitrarily.

In developing a positively prepared policy position, LBH should identify suitable areas where co-living would be beneficial as part of the overall spatial strategy. We propose developing suitable flexibility within the wording of Policy H09 (Part D) and deleting a prescriptive walking distance to define overconcentration, along with the evidence requirements outlined in Part D (i) (ii) (iii) which isn't justified and imposes overly restrictive tests for alternative uses.

Criteria A (g) of Draft Policy H09 sets out that the ground floor of any LSPBSL scheme should be designed and located to provide active street frontage or public realm. It must include:

- i) Flexible Workspace
- ii) Public amenities (e.g. restaurants, cafes, leisure facilities) that are accessible to the wider public, to integrate into the surrounding area, as well as develop inclusive and sustainable communities.

The delivery of active street frontage remains key to developing successful development proposals, particularly in town centres, and isn't exclusive to co-living schemes or a singular typology. Part G adds an overly prescriptive set of requirements that are being applied in an arbitrary way. This fails to recognise the need for sites to respond to need for workspace and public amenity on a site-by-site basis. It also fails to recognise the constraints some sites can have, particularly in urban locations where the provision of these facilities cannot be satisfactorily accommodated to serve their desired purpose. The policy wording should be amended to be aspirational to ensure viability and the deliverability of Policy H09.

Notwithstanding, Tide Construction's co-living model seeks to foster a sense of community through social events and developing successful ground floor uses which positively interact with the wider area and delivers on the draft criteria. Communal spaces are designed around the entrance to enable events to engage residents as they arrive and leave the building. Communal spaces are prioritised for use and times when residents are likely to be open to engaging with other residents and are designed to be flexible enough for the community to grow. Communal areas include co-working and working from home spaces, communal catering spaces and social events space and wellness centre (including gym and classroom). Ground floor uses are often public facing to ensure integration with the wider public realm and enhance activity within the street.

Criteria A Part (h) requires proposals to demonstrate a flexible design and layout to allow a LSPBSL scheme to be converted/retrofitted to a hotel (Use Class C1) or self-contained residential uses (Use Class C3), or other town centre uses without the need for demolition and rebuild. This policy replicates Circular Economy Statement requirements and adds an overly prescriptive requirement to Policy H09 which isn't justified. Part h should be deleted from the proposed submission version wording to ensure this policy is considered sound and consistent with national and regional guidance.

Policy H09 Criteria B should be deleted as LSPBSL LPG is now adopted guidance, but does not represent policy, as such it should be removed as a defined policy test.

Supporting text within paragraph 4.9.6 of Draft Policy H09 states that the Council's Draft Local Housing Needs Assessment did not identify any requirement to provide LPBSL accommodation to address any specific local housing needs, as a younger population (aged 25-44) and single households are not projected to increase during the Plan period and the Borough lacks a significant student population. The assessment implies that LSPBSL does not meet the unique offer of this type of accommodation and does not meet the needs of single person households in London. This presents an overly simplified position and fails to properly consider the way in which many young single people amalgamate to live together in what is shared accommodation. This can range from HMOs to self-contained flats where 2, 3 or 4 single people (previously not known to each other) living together or larger C3 houses where 4, 5, or 6 or more people are living together. Often this form of accommodation could be better utilised as family housing. Paragraph 4.9.6 should therefore be amended to fully consider the true demand for PRS accommodation suitable for sharers. Co-living remains a new form of housing for London and is responding to the needs of single person households and couples, playing an important role in providing greater choice within the private rental sector for these groups.

Policy G13: Biodiversity

The Council's requirement to increase the level of required biodiversity net gain (BNG) set out in statute is unjustified, setting a minimum net uplift in biodiversity unit value of 15%. This policy is therefore unsound, has not been justified and fails to align with national policy and should therefore be amended.

Harrow's New Local Plan Regulation 19 Consultation

The statutory provisions for BNG are new and time is required to understand how the national 10% requirement will operate in practice. This is particularly the case when this measure can't be seen in isolation from all the other measures in the plan which will impose significant additional costs in the delivery of development on brownfield sites which both government and the London Plan want to see prioritised.

Tide Construction is committed to improving BNG and has a track record for doing so. However, the characteristics of sites vary enormously and is not always possible to deliver on-site provision.

Having a higher target of 15% and where no on-site provision is deliverable will result in punitive payments further eroding viability and the likelihood on some sites of no proposals coming forward at all. For these reasons, the policy should be amended prior to submission to reflect the statutory BNG requirement of 10% in accordance with legislation and national policy

Summary

There is broad support for the principles of the proposed Local Plan and the approach to addressing the identified housing needs. We support the focus for delivery of growth within the town centre and the defined Opportunity Area, defining tall building zones to make the best use of land.

There is general support for the support for the introduction of a policy on PBSL, including co-living. However, The London Plan and LSPBSL LPG has a clear policy position on this type of accommodation and therefore the Council's proposed local variations should be deleted in its entirety to ensure consistency with regional policy and avoid obvious policy conflicts that could compromise this type of development coming forward.

Site Allocation OA1 is strongly supported in principle but should be amended to reflect current approach to redeveloping the Site, which reflects considerable engagement with both the LPA and GLA, and to remove the policy requirement to re-provide existing car parking which will significantly constrain delivery.

At present we do not consider the plan to be sound, as measured against the tests of soundness set out in the NPPF. We would therefore have an interest in participating in any hearing sessions held at the Examination in Public ('EiP') on the matters raised in our representations and we would like to be kept informed of the submission and examination of the Harrow Local Plan.

We trust that these representations provide a clear assessment of relevant policies, and we request that our comments are considered as part of proposed amendments to the final submission version.

Please do not hesitate to contact me or my colleague Ben Peirson should you require additional information, Robert.nicholas@hta.co.uk or Ben.Peirson@hta.co.uk

Yours sincerely

Robert Nicholas

Senior Planner



Appendix 1.
Site Location Plan

