

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

17th December 2024

London Borough of Harrow New Local Plan – Regulation 19 Local Plan Representations Representations on behalf of Tesco Stores Limited

Dear Planning Policy Team,

London Borough of Harrow are in the process of producing a new Local Plan which will guide development in the Borough between 2021-2041 and are currently undertaking a Regulation 19 consultation on Draft Local Plan until 17th December 2024.

We are writing on behalf of Tesco Stores Limited ('Tesco') who own the following site ('the site'):

Tesco Superstore, Station Road, Harrow, HA1 2TU

Site Background

The site is positioned at a key crossroads on Station Road, mid-way between Harrow on the Hill and Harrow and Wealdstone and within the Harrow and Wealdstone Opportunity Area. It measures at 2.19 hectares and is currently occupied by a single storey Tesco Superstore which was opened in 1992. Although performing well, the store is now over 25 years old and no longer reflects modern retailing standards and customer expectation. The existing site layout with the store located towards the back of the site relative to the retail frontage on Station Road gives the impression of a car-dominated retail development. Redevelopment to reprovide a modern store with residential above would contribute to the objectives of the opportunity area and allow for significant improvements to Station Road. The existing site plan is included below.

The Site is allocated within the 2013 Harrow and Wealdstone Area Action Plan as Site 11. The allocation proposed limited redevelopment for the retention and extension of the Tesco store along with new retail units and 14 new homes on the corner of Station Road and Hides Road. This allocation was based on an unimplemented 2012 planning permission and represents a significant underutilisation of the site.

The site is the subject of a major planning application (ref. PL/0693/24) which was validated on 11th April 2024 and will provide a new and improved Tesco store alongside 504 new homes. This is expected to be determined at committee in March 2024. A separate submission was also made to the April 2024 call for sites consultation running concurrently with the Regulation 18 consultation which informed site allocation OA7: Tesco Station Road.

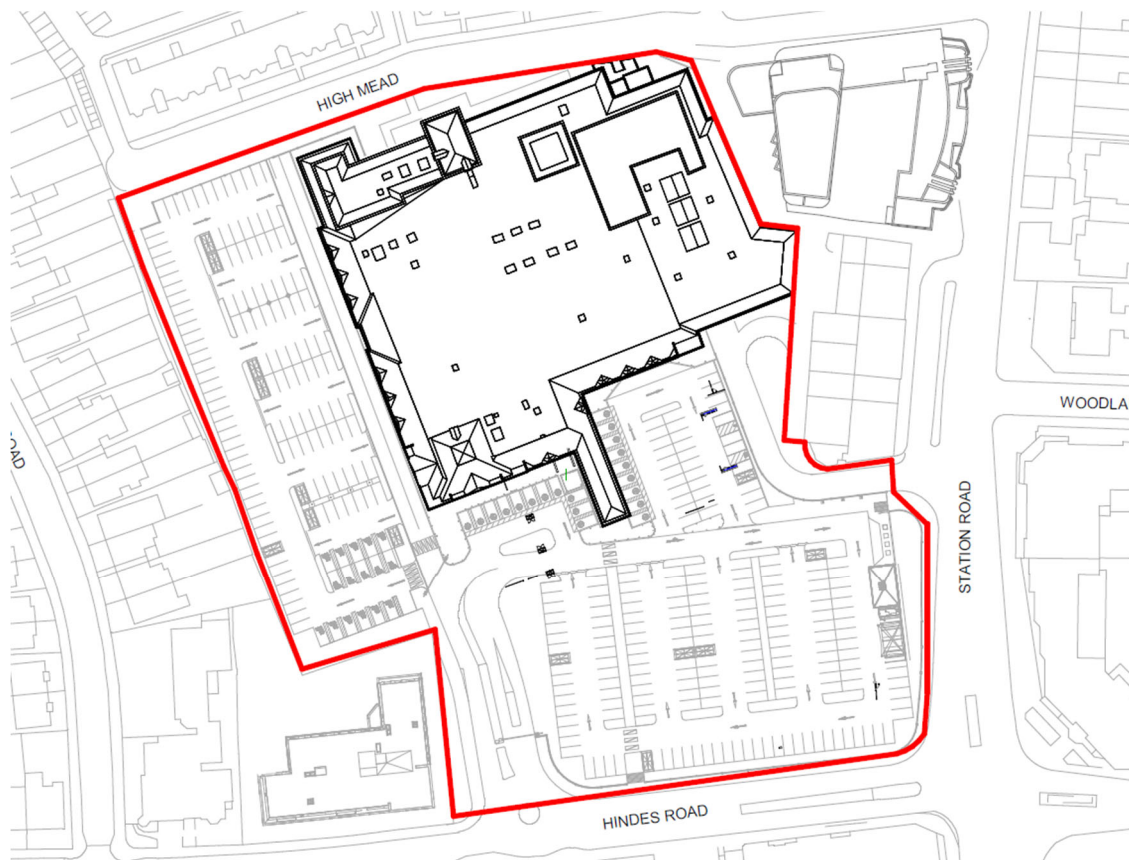


Figure 11111: Existing Site Plan

Representations

Tesco support the preparation of a new Local Plan, which sets out a clear approach for the delivery of housing, economic objectives and environmental sustainability for the Borough. The strategic approach to direct much of future development to the most sustainable and central locations such as the Harrow and Wealdstone Opportunity Area and town centres will help revitalise and regenerate these areas whilst protecting the suburban character within the rest of the Borough.

These representations provide comments on the following policies within the Regulation 19 Draft Local Plan:

1. Site Allocation OA7: Tesco Station Road
2. Policy GR4: Building Heights
3. Strategic Policy 05: Harrow and Wealdstone Opportunity Area
4. Policy M2: Parking
5. Policy CN1: Sustainable Design and Retrofit
6. Policy HO1: Dwelling Size Mix

Site Allocation OA7: Tesco Station Road

The list of allocated sites includes the Station Road Tesco under new allocation OA7, with an indicative capacity of 500 homes and a new supermarket. Tesco support the inclusion of this new site allocation and also welcomes the inclusion of the indicative capacity. The December 2024 NPPF introduces a new standard method for calculating housing need, meaning that Harrows housing requirements will increase substantially by 613 new homes per year from 1,516 to 2,294, so allowing a degree of flexibility can help meet these increased requirements, assuming other planning matters are adequately addressed.

Policy GR4: Building Heights

Draft Policy GR4 states that:

- A. *Tall buildings to be directed to designated tall building zones within the Harrow & 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)*
- B. *Proposals shall not exceed the maximum appropriate heights as set out within the designated tall buildings zones shown within the Policies Maps.*

The designated Tall Building Zones Map on p.57 of the Draft Local Plan indicates that the site is suitable for development of up to 15 storeys. We understand that this threshold has been informed by a Tall Building Study (2024) which forms part of the Local Plan evidence base. This report has undertaken a suitability and sensitivity analysis across the Harrow & Wealdstone Opportunity Area, which has identified tall buildings zones, along with maximum appropriate building heights within them.

This report confirms that the Tesco site offers an opportunity to make better use of land. At the centre of the site, there is opportunity for a maximum building height of 15 storeys, whilst the edges should be sensitive to the low-rise Station Road Parade and surrounding low-rise houses.

Tesco supports the proposed wording of Policy GR4 and the proposed 15-storey threshold identified for the site on the following basis:

- A. The site does not sit within any of the protected viewing corridors identified by the London View Management Framework Supplementary Planning Guidance.
- B. 15 storeys on the site would be in line with the urban character of the Borough area and would respond to the existing townscape context within the Opportunity Area.
- C. Development of up to 15 storeys on the site would reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. At present there is a 'gap' in street frontage owing to the surface car park servicing the superstore, proving an opportunity to create a new retail urban frontage and a continuation of the commercial uses along the key artery connecting the two town centres of Harrow & Wealdstone and Harrow-on-the-Hill.
- D. Tesco support the approach of focusing taller development towards the centre of the site, but there is an opportunity for a taller element on the corner of Station Road and Hindes Road to mark the junction. Planning application PL/0693/24 proposes a 12 storey building in this location and this is considered to be in-keeping with the street scene on the corner.
- E. The Safari Cinema site sits directly adjacent to the north-east corner of the application site. Planning permission ref. p/3043/19 was approved by LB Harrow in January 2020 for a cinema and 78 residential units, including an 11 storey element. This permission has been implemented and is currently under construction. The officers report for the approval acknowledged at paragraph 6.3.1 that *'It is inevitable that the character of the area will significantly change as a result of the high*

density of development proposed. However, the increase in density in this location is vital to support the wider regeneration of the Heart of Harrow Opportunity Area and its surrounding area through sustained economic growth and job creation’.

Strategic Policy 05: Harrow and Wealdstone Opportunity Area

Draft Strategic Policy 05 splits the Harrow & Wealdstone Opportunity Area into three distinct areas, including Station Road. Part G of the draft policy sets out the requirements for Station Road:

G. Development along Station Road linking Wealdstone District Centre and Harrow Metropolitan Town Centre must make a positive contribution to its environment and identity. Proposals should:

- a. Be of a massing, bulk, scale and a high-quality design that optimises land, consistent with the sub-areas inclusion within the broader Opportunity Area (being a designated area suitable for substantial change), whilst ensuring a satisfactory relationship with the surrounding suburban character area which is a much lower density;*
- b. Provide active, viable and serviceable non-residential ground floor frontages; and*
- c. Contribute to planned improvements to the public realm and road junctions, including the creation of a green boulevard, which improves the environment and active transport linkages between the two centres.*

Tesco support the inclusion of Strategic Policy 05.G and planning application PL/0693/24 includes proposals that fully address the requirements of parts a-c of the policy. As part of the Harrow and Wealdstone Opportunity Area, Station Road is a highly accessible and sustainable location with significant potential to accommodate high quality development which optimises density in accordance with London Plan Policy D3 whilst also repairing the street scene, enhancing the public realm and improving connectivity between Harrow and Wealdstone town centres.

Policy M2: Parking

Draft Policy M2 proposes parking standards in alignment with the London Plan. Part H of the draft policy states:

H. Any proposed reduction of car parking (either on-street or off-street) should have regard to the overall parking provision in the centre, and should not adversely impact upon town centre vibrancy and vitality. Proposals to improve the quality of existing off-street car parking will be supported and encouraged.

Tesco support the inclusion of draft Policy M2.H. Retaining and improving sufficient car parking provision where it already exists is essential for the viability of the Station Road Tesco as well as the Harrow on the Hill and Harrow and Wealdstone Centres by providing continuity of linked trips that also support the wider viability of the town centre.

Policy CN1: Sustainable Design and Retrofit

Draft Policy CN1.e (Offsetting) states:

'Offsetting will only be accepted as a means to achieving planning policy compliance as a last resort if the building is compliant with all other Net Zero Carbon building aspects. In these circumstances, the applicant should establish the shortfall in renewable energy generation to enable the annual renewable energy generation to match the Energy Use Intensity in kWh. The applicant should pay into the Council's offset fund a sum of money equivalent to the shortfall; this contribution will be secured by way of a planning obligation'.

Measures are intended to incentivise the delivery of sustainable buildings in London, however the two options for the carbon offset fund based on Energy Use Intensity (EUI) and solar PV maximisation deviate from Part L of the Building Regulations and Strategic Policy including London Plan Policy SI 2 which sets the carbon offset price as £95 per tonne. For a policy to be considered sound it must be robustly tested and justified, taking into account the reasonable alternatives, and based on proportionate evidence as well as being consistent with national policy (NPPF para. 35).

Policy HO1: Dwelling Size Mix

Emerging Policy HO1.A.1 states that:

'All developments for conventional residential must provide a good mix of unit sizes, to adequately address the Borough's housing needs, particularly for families, as well as contribute to and support the creation of inclusive and mixed communities. To achieve this, proposals must apply the following sequential approach to housing priorities: i) Ensure a minimum of 25% of all units within a scheme are family sized dwellings (three bedrooms or more) and a higher proportion will be required on suitable sites'.

Tesco recognize the importance of delivering a good mix of unit sizes, including family sized dwellings, however consider the current wording of the draft policy to be overly restrictive.

London Plan Policy H10.A recognizes that a higher proportion of one and two bed units is generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity and the need for additional family housing and the role of one and two bed units in freeing up existing family housing. Part B of Policy H10 states that Borough should provide guidance on the size of units required (by number of bedrooms) for low-cost rent homes.

Applying a 25% requirement across all tenures will affect the viability and deliverability of schemes and we request that the policy is adjusted to apply to affordable tenures only, which allowing greater flexibility for private elements to meet market demand. Additionally, whereas this policy may be appropriate for smaller sites in suburban areas, large redevelopment schemes in the opportunity area proposing higher density mixed-use development are unlikely to be able to fully comply with this policy while remaining viable.

Conclusions

Tesco welcome the opportunity to comment on the emerging local plan and consider the proposed height thresholds set out in draft Policy GR4 to represent a positive approach to make better use of an under-utilised site in a sustainable location, as well as provide opportunities to repair the 'gap' in the Station Road street frontage. Draft Strategic Policy 05 aligns with the objectives of the Harrow and Wealdstone Opportunity Area and planning application PL/0693/24 includes proposals that fully address the requirements of parts a-c of the policy. Draft Policy M2.H also contributes to the ongoing viability of the opportunity area and local centres.

Tesco welcome the opportunity to comment on the emerging Local Plan, please contact [REDACTED] if you have any questions or would like to arrange a meeting.

Yours faithfully

[REDACTED]

For and on behalf of
Rolfe Judd Planning Limited