

View results

Respondent

73

Anonymous

36:44

Time to complete

Part A - Personal Details

We will not be able to accept responses where personal details are not provided.

1. Are you submitting this representation as an individual or on behalf of an organisation? *

- Individual
- Organisation

2. Title

Mr

3. First Name *

Charles

4. Last Name *

Moran

5. Job Title (where relevant)

Planning Director

6. Organisation (where relevant)

Scape

7. Address Line 1

8. Address Line 2

9. Address Line 3

10. Address Line 4

11. Post Code

12. Telephone Number

13. Email Address *

Part B - Your Representation(s)

To which part of the Local Plan does this representation relate? (Please make one representation at a time, you can click to make a further representation - up to a maximum of 10 per form - at the end of this section).

14. To which policy does your representation relate? *

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

15. Do you consider this policy sound?

- Yes
- No

16. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

These representations are submitted by Scape Living a highly experienced developer and operator of residential accommodation, including "large scale purpose built-shared housing" and other forms of specialist housing.

Scape supports the decision to include Policy HO9 in the new Local Plan which provides a much-needed policy context for schemes delivering large-scale purpose-built shared housing ("LSPBSL") recognising that such forms of accommodation form a strategically important part of London's housing offer which meets distinct housing needs and reduces pressure on other elements of the housing stock.

LSPBSL has the potential to make a meaningful contribution towards meeting both Harrow and London's wider housing needs, as also recognised by The London Plan (2020). In general, we support the criteria set out in Draft Policy HO9 which we consider will help to secure high-quality purpose-built shared housing schemes in appropriate locations.

However, we object to the following elements of the draft policy which we consider need to be re-drafted to reflect national guidance, The London Plan and the Council's evidence base:

Part (b) – we support the requirement under part (a) of the draft policy that proposals for shared living will be required to demonstrate how they are meeting local housing needs. However, as a form of market housing, we do not consider the requirement under part (b) to demonstrate the affordability of LSPBSL compared to alternative products within the private rented sector is appropriate or justified.

Specifically, as a form of market housing, it would be inconsistent with other forms of housing development to require an applicant to demonstrate the affordability of its proposal other than in the context of viability discussions.

Accordingly, we do not consider that this element of the draft policy is sound and should be deleted.

Part (f) – we support the Council's objective to maximise the delivery of housing in the borough which LSPBSL would contribute towards.

Accordingly, as a form of residential accommodation which contributes towards housing numbers (and local needs), we do not consider it appropriate to exclude LSPBSL from development sites which have been identified as suitable for housing. We support the requirement to demonstrate that LSPBSL must contribute towards local housing needs (ie. part (a) of the draft policy), but consider that part (f) which presumes that LSPBSL is not appropriate on sites allocated for housing should be deleted as this is likely to prejudice the Council meeting its overall housing targets.

17. Would you like to make another representaion?

- Yes
- No

Part C - Demographics