



Places for London  
Property Development

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Date: 17 December 2024  
Our ref: TfL/Places/VSH/BH – LBH Plan R19  
Your ref: -

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

By email: Local.Plan@Harrow.gov.uk

Dear Sir / Madam,

**NEW HARROW LOCAL PLAN 2021 - 2041 – RESPONSE TO REGULATION 19 CONSULTATION REPRESENTATIONS BY PLACES FOR LONDON**

Places for London (‘Places’) is pleased to provide its views on the Council’s Regulation 19 New Harrow Local Plan 2021-2041. Please note that the views expressed in this letter and attachments are those of Places in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

**Places for London**

Places is TfL’s property company, managing space for over 1,500 businesses in TfL stations and railway arches, and on London’s high streets, as well as developing TfL’s surplus and / or under-used land to deliver new homes and jobs in highly sustainable locations. We are a significant land owner in the borough including the following sites with development potential:

- Canons Park station car park
- Stanmore station car park
- Rayners Lane station car park
- Land adjoining Harrow on the Hill station

We have previously commented on the Regulation 18 version of the draft Plan and promoted the above sites for allocation via your ‘call for sites’ Our Regulation 18 representations dated 23 April 2024 and ‘call for sites’ forms are attached for your convenience.

## Places for London Regulation 19 Representations

As we have a relatively large number of representations across the policies and site allocations (SA), we have not used your template representations form. However, we have used your headings where it is relevant to do so.

### Part A – Personal Details

These are all provided in this letter.

### Part B – Representations

Please see the attached table in which we summarise our Regulation 18 representations and provide our updated Regulation 19 representations.

We intend to participate in the Examination hearing sessions and will liaise with the Planning Inspectorate / EiP programme officer in due course. We consider that this is necessary to ensure that our homebuilding programme within the borough can progress and that the opportunities for new homes and jobs in the borough are optimised to meet local and London's needs.

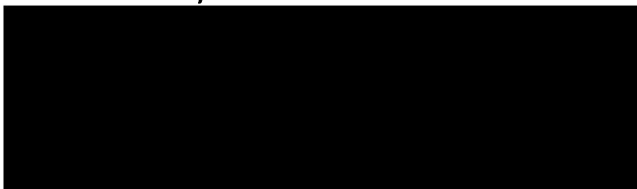
### Part C – Equality Monitoring Questions

These representations are submitted on behalf of Places and not an individual. We strive to reflect, represent and meet the needs of London's diversity, and it would not be appropriate or accurate to complete this part of the form as an organisation.

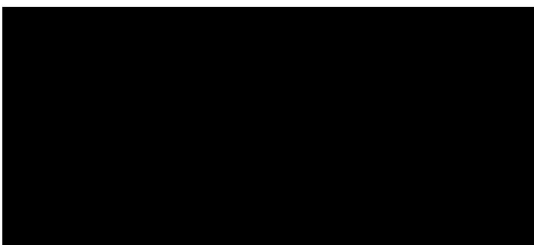
### Concluding Remarks

We trust that we have provided sufficient information for the Council to be able to consider these representations and submitted sites. However, if you require any additional information, please do not hesitate to contact me or my colleague Luke Burroughs.

Yours faithfully



Places for London



encs.

1. Places for London Regulation 19 Representation table
2. Places for London Regulation 18 Representations letter dated 23 April 2024, including Call for Sites forms for: Canons Park station car park, Stanmore station car park, Rayners Lane station car park and Harrow on the Hill station



## Places for London Regulation 19 Representations on New Harrow Local Plan

17 December 2024

Chapter / Policy / Paragraph / Site	Summary of Reg 18 Representations	Regulation 19 Representations
<p><b>Chapter 01:</b> Borough Profile, Spatial Vision, Strategic Objectives and Spatial Strategy / Spatial Strategy, pages 25 - 27</p>	<p>We note and support the target to provide a minimum of 16,040 new homes. This figure appears to derive from doubling the London Plan 10 year housing target (8,020) and we would anticipate a more sophisticated calculation for the latter years based on identified needs emerging during subsequent stages of Plan preparation. This will also be informed by the upcoming London Plan review.</p> <p>We also note that the requirement for a minimum of 7,500 additional new homes to be provided within the Harrow &amp; Wealdstone Opportunity Area (OA) means that other parts of the borough will need to accommodate at least 8,540 new homes.</p> <p>Harrow-on-the-Hill station and the surrounding area is envisaged as being comprehensively redeveloped to provide a new focal point for the Harrow Town Centre comprising retail, leisure, office and residential uses. Places looks forward to working with the Council and other surrounding land owners to help make this happen, with a scale of development that can deliver the quantum of new homes, jobs and other public benefits that the town centre and borough needs.</p>	<p>Our general comments from Reg 18 stand and we note that the London Plan review is imminent and so there are likely to be revised housing targets emerging. We also note that, last week, the national housing target was increased from 300,000 to 370,000 homes per year, and that the target for London was increased to 88,000 homes per year (up from 52,000 in the London Plan) using the ‘revised standard method’. The borough may have to revise its housing target upwards, likely quite substantially, depending on how quickly the draft Plan progresses. However, until the Mayor establishes housing targets for boroughs, rolling forward the current housing target for Harrow is noted.</p>
<p><b>Chapter 02:</b> High Quality Growth / Strategic Policy 01: High Quality Growth, pages 30 - 31</p>	<p>Paragraph b says that new development and growth will “predominantly be directed into the Harrow &amp; Wealdstone Opportunity Area”. This may need subtle rewording to reflect that the majority of new homes will be provided in other parts of the borough (see above). Given most development will be accommodated in other</p>	<p>Our suggestions have not been incorporated in the amended policy. The Housing Trajectory (page 294) now shows that development and growth within the OA will outpace other parts of the borough. Notwithstanding, the principle still stands that in the other parts of the borough higher density, optimised development should be</p>

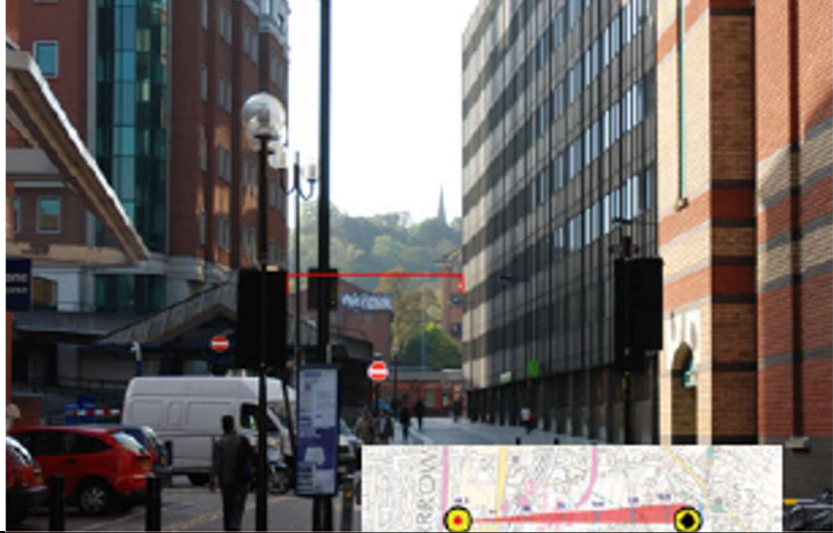
	<p>parts of the borough, we suggest that this part of the Plan should encourage higher density, optimised development in the most sustainable locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling (ie. areas close to underground and railway stations and other transport hubs), in accordance with London Plan policies D3 (Optimising site capacity through the design-led approach) and D2 (Infrastructure requirements for sustainable densities).</p>	<p>encouraged in in the most sustainable locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling (ie. areas close to underground and railway stations and other transport hubs). Optimising site capacity and development opportunities through sensitively designed, higher density schemes is a key aspect of the design-led approach set out in London plan policy D3 (<i>Optimising site capacity through the design-led approach</i>) and must be reflected in this policy which currently reads as too restrictive and unambitious. This lack of ambition and failure to optimise development potential is reflected in the draft Plan’s site allocations (SA) for our sites (see below).</p>
<p><b>Chapter 02:</b> High Quality Growth / Policy GR1: Achieving a High Standard of Development, pages 34 - 35</p>	<p>While we welcome the Council’s aspiration to “<i>ensure the most efficient and optimal use of land</i>” and application of a ‘design-led approach’ (paragraph B), there could be a tension between this and the following paragraph’s reference to “<i>responding appropriately to the local context in terms of building height, bulk, massing, footprint, building line, scale and existing design characteristics</i>” (paragraph B.a). The policy (not supporting text or Supplementary Planning Documents) should make clear that this does not mean that local heights etc cannot be exceeded as it will be necessary to do so in order to “<i>ensure the most efficient and optimal use of land</i>”. In addition, we reiterate that the Plan should encourage higher density, optimised development in the most suitable, sustainable and well connected locations (ie. close to underground and railway stations and other transport hubs) – please see above.</p>	<p>Our suggestions have not been incorporated in the amended policy and we maintain our representations.</p>
<p><b>Chapter 02:</b> High Quality Growth / Policy GR4: Building Heights, page 52</p>	<p>The Council defines tall buildings as 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) and restricts them to the Harrow and Wealdstone OA only. Given that the majority of new homes in the borough will be provided outside of the OA, and in order to “<i>ensure the most efficient and optimal use of land</i>” (Strategic Policy 01) it will be necessary to be more flexible and to enable taller</p>	<p>The general tenor of our representations have not been addressed. We maintain them ie. that restricting locations where tall buildings may be potentially appropriate to designated tall buildings zones within the Harrow and Wealdstone OA area only is unduly restrictive and may not enable the optimisation of site capacity and development opportunities within the borough, particularly the delivery of much-</p>

<p>Paragraph 2.4.1, page 53</p>	<p>buildings in appropriate locations elsewhere that are well connected and sustainable, such as town centres and close to underground and railway stations and other transport hubs.</p> <p>Importantly, in advance of the ‘call for sites’ and the Council knowing what capacity there is for the delivery of new homes both within the OA and elsewhere in the borough to meet the minimum 16,040 new homes target, it is premature to restrict height. In our view it is unlikely that there will be sufficient land to provide the homes that are required at prevailing suburban heights. However, this will only be known following the ‘call for sites’ and the allocation of available, suitable and deliverable sites.</p> <p>Places reserves its position to critique the Harrow Characterisation &amp; Tall Building Study (2021) and Tall Building Study (2024), which are cited as ‘informing’ the Local Plan (presumably relied upon as part of the evidence base), at Reg 19, EiP and subsequent stages of Local Plan preparation.</p>	<p>needed housing, in well-connected and sustainable locations such as those close to transport hubs and town centres.</p> <p>We support the amendment to <b>GR4B</b> to ensure conformity with the London Plan (ie. deletion of reference to ‘maximum’ building heights).</p> <p>We consider that the additional sentence added in the middle of <b>paragraph 2.4.1</b> should be amended in order for it to be sound and accord with national and London-wide planning policies and guidance. We are not aware of any requirement for tall buildings to be “<i>the most appropriate form of development</i>” for a site, only that it should be an appropriate one in accordance with an up-to-date development plan and other material considerations. We suggest the following modification to make the Local Plan sound:</p> <p style="text-align: center;">Proposals for tall buildings should provide a design rationale to demonstrate that a tall building is <del>an the</del> <b>most</b> appropriate form of development for the site and its context.</p> <p>We support the amendment to the second to last sentence to paragraph 2.4.1 by the deletion of reference to “<i>maximum</i>” building heights.</p> <p>We also recommend that the following text should be included either in Policy GR4 or the supporting text:</p> <p style="text-align: center;"><b>Appropriate height levels within tall building zones should be established via a comprehensive design-led process at pre-application stage to ensure that the development capacity of the site is optimised and fully tested in line with the London Plan.</b></p>
<p>Local Plan Policies <i>Map - Building</i></p>	<p>The identification of the Harrow and Wealdstone Opportunity Area (OA) as a tall building zone is welcomed. This is an accessible (PTAL 6)</p>	<p>Our suggestions have not been incorporated in the amended map designations and we maintain our representations. In particular the</p>

<p><i>Heights:</i> Land adjacent to Harrow on the Hill Station</p> <p>Tall Building Zones Map, page 57</p>	<p>location within Harrow Metropolitan Town Centre and the OA which is suitable for high density mixed use development and appropriate for tall buildings.</p> <p>Harrow on the Hill station and adjoining land is a development opportunity in a location with a mixed townscape character in terms of building typologies and land uses. There are a number of tall and large buildings nearby which range in height between six and 20-storeys, including the Harrow Square development (Hyde Group / Barratt London). This is a high quality scheme with refined and varied massing which features a series of slender towers along College Road. The scheme responds positively to the surrounding townscape context and character and demonstrates that there is potential to successfully accommodate well-designed tall buildings in this location.</p> <p>The draft New Local Plan identifies the potential for heights up to 18-storeys on the TfL-owned bus station and First National House on College Road. However, a lower maximum height of 12-storeys is proposed on TfL-owned land to the south of the station adjacent to Station Approach. This lower height range has not been justified in terms of the evidence and in view of the existing and emerging townscape context.</p> <p>Places believes that a height of 18-storeys should be considered for this southern land parcel (rather than 12-storeys), with a stepped approach outlined where necessary taking into account key views. In addition, we consider that a 20-storey building height should be identified on the northern TfL land parcel, in line with what has been approved on the adjacent College Road scheme.</p> <p>The conclusions set out in the Council’s evidence base on tall buildings - the Harrow Characterisation and Tall Buildings Study (2021) and</p>	<p>building heights specified on the Local Plan Policies map should not be expressed as a maximum number of storeys; this change would accord with the changes made to policy <b>GR4B</b> and <b>paragraph 2.4.1</b> (see above) and, importantly, there is no justification for the heights provided within the evidence base (see our Regulation 18 representations to the left).</p> <p>Similarly, the word “<i>maximum</i>” also needs to be removed from the legend to the <b>Designated Tall Building Zones Map</b> at page 57, so this also reads as “<i>appropriate</i>” heights for tall buildings.</p> <p>There may be other instances in the draft Plan where the use of the term “<i>maximum</i>” heights or similar should also be amended.</p>
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	<p>Harrow and Wealdstone Opportunity Area Tall Buildings Study (2024) - are not considered to be justified or appropriate. The study does not include any townscape views / 3-D modelling to demonstrate that these are appropriate maximum heights for the area. This means that the proposed building heights set out in the Allies and Morrisons study and the draft Local Plan should not be relied on as ‘maximum’ heights for the area.</p> <p>An ‘appropriate’ height range should be set as required by the London Plan Policy D9, Part B. Setting an absolute ‘maximum’ height level at plan-making stage on this type of complex site should be avoided and an appropriate degree of flexibility should be provided. Maximum height levels would then be established via a detailed pre-application and design-led process to ensure that the development capacity of the site is optimised in line with the London Plan.</p>	
<p><b>Chapter 02:</b> High Quality Growth / Policy GR5: View Management, page 61</p>	<p>The draft New Local Plan proposes to carry forward the protected views from the existing Local Plan Development Management Policy Document (2013). This follows a similar approach to the London Plan View Management Framework in terms of identifying protected viewing corridors and defining height thresholds.</p> <p>Draft Policy GR5 states that height exceeding the ‘restricted corridor’ red line “<i>will be refused</i>”. We show below Protected View No. 3, St Annes Road, which appears to cross our Harrow on the Hill station / bus station site and include First National House. The draft Plan’s proposed approach is likely to mean that any redevelopment of the bus station may be rendered unviable and undeliverable. This needs to be reconsidered and fully tested as part of the draft Local Plan process. Some development could exceed the red line whilst also preserving the view of the silhouette of the St Mary’s Church and its setting, particularly noting the urban context and ‘canyon’ view and</p>	<p>We maintain that some development could moderately exceed the ‘restricted corridor’ red line whilst also preserving the view of the silhouette of St Mary’s Church and its setting, particularly noting the urban context and ‘canyon’ view and development in the foreground, which already exceeds the red line threshold. We therefore suggest the following modification to the wording of <b>policy GR5 Part B.a</b> in order to enable development and make the Local Plan sound:</p> <p style="text-align: center;">Development within a Protected Views Restricted Corridor (shown in red) that exceeds the specified threshold height <del>will be refused</del> should preserve and enhance the viewer’s ability to recognise and to appreciate the landmark in these views.</p> <p>We question the insertion of “<i>maximised</i>” in paragraph <b>GR5 G</b>, which suggests that “<i>opportunities to create new local views and vistas</i>”</p>



	<p>development in the foreground, which already exceeds the red line threshold, as shown below:</p> 	<p>would be accorded more weight in the planning balance than is appropriate. While local views and vistas can be a planning consideration, it would not be appropriate to ‘maximise’ this at the potential expense of other important planning considerations such as eg. optimisation of development, good design, and the delivery of new homes and jobs.</p>
<p><b>Chapter 02:</b> High Quality Growth / New Policy GR3A: Inclusive Design, page 44</p>	<p>N/A</p>	<p>Please note that the text for new policy <b>GR3A</b> differs between the versions in the <i>Harrow Local Plan – Proposed Submission Version</i> and the <i>Schedule of Changes Post Regulation 18</i>. Clearly this needs to be clarified. We base our representations below on the latter.</p> <p>We suggest modification to paragraph <b>GR3A E</b> to clarify what is meant by “no design differences”, which is currently expressed too widely. For eg. while it is generally appropriate and beneficial for there to be no external differences in terms of quality and design between market and affordable homes, it would not be appropriate to control the internal layout and design of homes and communal spaces in this way. Registered Providers (RP) have their own requirements and standards which will not necessarily match those for ‘build for sale’ or ‘build to rent’. We also suggest replacing the word “must” with “should” in</p>

		<p>order to provide some flexibility in cases where RPs would prefer a different design for practical, management or cost reasons.</p> <p>In addition, we also query the requirement for “<i>all communal private amenity space</i>” to be accessible to all residents, regardless of tenure. By its nature, communal amenity space is not <i>private</i>, but <i>shared by residents</i>. In addition, in many schemes separate areas of communal amenity space will be allocated to particular buildings for reasons of adjacency and security. We therefore suggest:</p> <p style="text-align: center;">Development proposals for housing must be tenure neutral, there <del>should</del> <b>must</b> be no <b>external</b> design or <b>quality</b> differences based on the tenure of dwellings. <del>All</del> <b>e</b>Communal <del>private</del> amenity space must be accessible to <del>all</del> residents <del>and provided for all tenures. regardless</del> <b>of tenure</b>;</p> <p>This clarification would help to ensure that the Plan is sound.</p>
<p><b>Chapter 03:</b> Historic Environment / Policy HE1: Historic Environment, page 87 - 88</p>	<p>We note the reference in paragraph B.d to having regard to the “<i>sustainable economic benefits</i>” of development when considering proposals that alter heritage assets. This is narrower in scope than the NPPF which, in paragraph 208 refers to:</p> <p style="text-align: center;"><i>“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”</i></p> <p>Therefore, in conformity with the NPPF, we suggest that in balancing the impacts of proposals affecting heritage assets, the words “<i>economic benefits</i>” should be replaced with the more comprehensive “<i>public benefits of the proposal</i>”. In our view, public benefits would</p>	<p>We support the deletion of <b>paragraphs Ba.to g.</b> and, instead, reliance on assessment through a Heritage Impact Assessment which would need to follow the tests and balancing set out in the NPPF. This addresses our Regulation 18 representation on the left.</p>

include economic benefits alongside other benefits that could include (but would certainly not be limited to) improvements to public transport infrastructure and access, new public realm, affordable housing etc.

As a matter of principle, statutory and locally listed buildings should be dealt with separately because the former are afforded a very much higher level of protection than the latter. It is not appropriate or proportionate for statutory and locally listed buildings to be given the same status in the Plan, and such an approach does not conform to the NPPF. The degree of protection and constraints on development affecting locally listed buildings (ie non-designated heritage assets) should be much lower. Paragraph E and its heading should be amended accordingly.

We welcome the removal of references to locally listed buildings in **paragraph E** and support them being dealt with separately from statutory listed buildings (and other designated heritage assets) within new **paragraph J**. This addresses our Regulation 18 representation on the left.

The additional text for **paragraph I** (*Registered Parks and Gardens*) should refer to a balanced judgment (in accordance with the NPPF) being taken in cases where development impacts on significance or setting. In addition, the reference to locally listed parks and gardens should be removed because non-designated heritage assets are now dealt with in **paragraph J**. Therefore, we suggest:

In addition to (A) and (B) above, when considering proposals affecting the significance of registered ~~and/or locally listed~~ parks and gardens, the Council will:

- a. Ensure that development does not detract from the significance of the park, garden or landscape (including any contribution made by setting); or prejudice its continued operation or future restoration. **In weighing applications that affect the**

<p><b>Chapter 04:</b> Housing / Policy SP3: Meeting Harrow's Housing Needs, pages 97 - 100</p>	<p>Please see above (page 3) for our comments on the minimum 16,040 new homes target. The policy (paragraph 3) seeks to achieve this through building new homes falling into the following categories:</p> <ul style="list-style-type: none"> <li>A. <b>Harrow and Wealdstone OA:</b> min 7,500 new homes through extant permissions and on allocated sites. As above, we query whether there can be this degree of certainty in advance of the 'call for sites' being completed and a Site Allocations document being prepared.</li> <li>B. <b>Rest of the borough:</b> min 2,500 new homes through extant permissions and on allocated sites. Again, we query whether there can be this degree of certainty in advance of the 'call for sites' being completed and a Site Allocations document being prepared.</li> <li>C. <b>Small sites:</b> min 4,125 new homes on small sites (below 0.25ha) allocated within the Plan and on windfalls sites. Again, we query whether there can be this degree of certainty in advance of the 'call for sites' being completed and a Site Allocations document being prepared. We welcome the focus on provision in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail stations or town centres. However, as set out above, there has to be some recognition that taller buildings may be required in well-connected, suburban locations in order to use land efficiently and optimally, and to secure the number of homes required.</li> <li>D. <b>Windfall sites:</b> this presumably makes up the remainder of the 16,040 homes (ie. min 1,915 homes). It encompasses sites above 0.25 ha only, and as such, raises the question as to whether this is realistic: we would expect most sites of this</li> </ul>	<p>significance or setting of the asset, a balanced judgement will be taken including the public benefits of a scheme;</p> <p>We note the capacity of the OA has now been increased to 8,750. No doubt the EiP will test whether all of the allocated sites are suitable, available and economically viable.</p> <p>We note that the capacity of the rest of the borough has been increased to 3,165. Again, the EiP will test whether all of the allocated sites are suitable, available and economically viable. The draft SAs for three of our sites would not be economically viable. We maintain our view that there should be some recognition that taller buildings may be required in well-connected, suburban locations in order to use land efficiently and optimally, and to secure the number of homes required.</p>
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	<p>size to be identified through the ‘call for sites’ and Site Allocations (thus falling into categories A and B). We suggest that windfall sites should also benefit from a prioritising provision in locations with good public transport accessibility and within 800m of a transport hub or town centre. Again, there has to be some recognition that taller buildings may be required in well-connected, suburban locations in order to use land efficiently and optimally, and to secure the number of homes required.</p> <p>We welcome reiteration in paragraph 4 that <i>“New development will be directed towards the locations where infrastructure has the most capacity to accommodate new homes”</i> and perhaps it should be clarified, in line with paragraph 3, that this is in locations with good public transport accessibility and within 800m of a transport hub or town centre.</p> <p>We strongly support the provision of genuinely affordable housing and are required by the Mayor to deliver 50% across our portfolio of TfL housing development sites. However, the definition of affordable housing (paragraph 5A) as <i>“affordable to low-income groups”</i> does not conform to the NPPF definition and therefore to the London Plan (see footnote 53). The NPPF is clear that affordable housing includes <i>“discounted market sales housing”</i> and <i>“other routes to home ownership”</i> ie. it encompasses housing that is not only affordable to those on low incomes, but, particularly in London, also to those on middle incomes. We also note that your own definition of <i>“Genuinely affordable housing”</i> (page 282) is <i>“Housing which is demonstrably affordable to low and middle income earners in Harrow”</i>. Paragraph 5A therefore needs to be corrected to reflect the requirement to provide affordable housing for households with a range of incomes.</p>	<p>We understand that the small sites target is now used as the windfall allowance up to 2036 only. What happens after that date?</p> <p>We maintain this representation.</p> <p>We note the amendment to paragraph 5 in line with our Regulation 18 representations and support the change. We suggest that this part of the policy clarifies that genuinely affordable housing includes housing which is affordable to both low and middle income earners, in accordance with the definition of affordable housing on page 390.</p>
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	<p>Paragraph 5.G supports ‘build to rent’ (BtR) proposals within the OA. Restricting BtR in this way, to one part of the borough, does not conform with the London Plan which says:</p> <p><i>“Boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes. Build to Rent developments can make a positive contribution to increasing housing supply and are beneficial in a number of ways.”</i></p> <p>The restriction on BtR to within the OA must be excised and replaced with a positive approach to provision throughout the borough</p>	<p>We note that areas where ‘build to rent’ (BtR) would be supported have been increased by the inclusion of Edgware Major Centre and District Town Centres. While this is a positive change, we would also assert that locations with good public transport accessibility should be included (these are locations that can support car free housing, and which are attractive to economically active residents). We suggest:</p> <p>Build to rent: Built to rent proposals will be supported within the Opportunity Area, Edgware Major Centre, <del>and</del> District Town Centres <b>and in locations within 800m of a train station or other transport hub.</b></p>
<p><b>Chapter 04:</b> Housing / Table H1: Indicative Borough housing supply relative to requirement, page 101</p>	<p>N/A</p>	<p>The figures provided in the table will be tested at EiP. With respect to site allocations, we raise concerns on the basis that the low capacities given to the sites that we own are unrealistic and would render the sites unviable and undeliverable (please see below).</p>
<p><b>Chapter 04:</b> Housing / Policy HO3: Optimising the use of small housing sites, page 113</p>	<p>We reiterate that we welcome the focus on provision in locations with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail stations or town centres. However, as set out above, there has to be some recognition that taller buildings may be required in well-connected, suburban locations in order to use land efficiently and optimally, and to secure the number of homes required.</p>	<p>We maintain this representation.</p>
<p><b>Chapter 04:</b> Housing / Policy HO4: Genuinely Affordable</p>	<p>We welcome recognition in paragraph B that the London Plan ‘threshold approach’ to affordable housing provision applies as per policies H4 (Delivering affordable housing) and H5 (Threshold</p>	<p>We support the amended policy which incorporates our suggested change.</p>

Housing, pages 118 - 121

approach to applications). However, we suggest that the text clarifies that this means that applications providing a minimum of 35% affordable housing (with the tenure split agreed with the Council) should be submitted and determined via the 'fast track route'. Applications following the fast track route should not be subject to mid and late stage reviews.

The last sentence of paragraph B also needs to be redrafted to reflect the portfolio approach to public sector land set out in London Plan policy H4 (Delivering affordable housing). We suggest:

~~Public sector land~~, Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites will all be ~~expected required~~ to deliver the threshold level of at least 50 per cent affordable housing on each site. ~~Public sector land where there is no portfolio agreement with the Mayor will be expected to deliver the threshold level of at least 50 per cent affordable housing on each site. Where a public sector land owner has an agreement with the Mayor to deliver at least 50 per cent across their portfolio of sites, then the 35 per cent threshold should apply to individual sites.~~

This accords with paragraph 4.4.7 of the London Plan:

*"Public sector land represents an opportunity to deliver homes that can meet the needs of London's essential workers who maintain the function and resilience of the city. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site. Public sector landowners with an agreement with the Mayor may provide 50 per cent affordable housing across a portfolio of sites provided at least 35 per cent affordable housing is*

We support the amended policy which incorporates our suggested change and now reflects the portfolio approach to public sector land. We also support the related changes to **paragraph 4.4.6**.

	<i>provided on each site, with the required affordable housing tenure split on the initial 35 per cent.”</i>	
<b>Chapter 05:</b> Local Economy / <i>Strategic Policy 05: Harrow &amp; Wealdstone Opportunity Area</i> , pages 177 - 179	We have land and buildings around Harrow on the Hill station that could be suitable for redevelopment to provide much needed homes and jobs in the OA. The opportunity for Places to deliver development of scale on our own landownership alone is challenging, and we see the Council as having a key role in leading a larger development opportunity to come forward. We would be delighted to support the Council in regenerating this part of the town centre in the future.	<p>General comment. No changes necessary.</p> <p>We support the proposed changes to Strategic <b>Policy 05.D.e</b> and <b>paragraph 5.0.38<sup>1</sup></b> to prioritise sustainable transport such as walking and cycling in Harrow Town Centre.</p> <p>We generally support the changes to <b>paragraph 5.0.34<sup>2</sup></b> (to confirm that BtR developments can also be acceptable within District Town centres) but consider that an additional amendment is required for reasons of consistency and clarity. The paragraph states that “... <i>the predominant character of the borough is two – three storey in suburban locations and three to four storeys with the town centres and near transport hubs...</i>”. To be consistent with this, we suggest the following additional changes to the paragraph to confirm that BtR development can also be acceptable near transport hubs.</p> <p>Proposals for Built to Rent developments are likely to be acceptable within the boundaries of the Opportunity Area, <del>and the</del> District Town Centres <b>and near transport hubs</b>, subject to</p>

<sup>1</sup> Based on the Schedule of Changes. However, there is inconsistency in paragraph numbering - in the Proposed Submission (Regulation 19) version of the Local Plan, this is numbered 5.0.39

<sup>2</sup> Based on the Schedule of Changes. However, there is inconsistency in paragraph numbering - in the Proposed Submission (Regulation 19) version of the Local Plan, this is numbered 5.0.35.



		<p>compliance with other policies of the Development Plan. These locations provide good access to public transport, local services, facilities and pursuing employment opportunities. This will encourage increased sustainable modes of transport, reduce car use and the risk of increased on-street car parking in the surrounding area. Build to rent schemes accommodate a minimum of 50 units (or more) and require the delivery of a significant quantity of units; to benefit from economies of scale and fund the cost of managing and operating the development. Therefore build to rent schemes on smaller sized sites, particularly outside of the above proposed locations ( i.e. suburban areas) would require development to be built at a high density on 4 or more storeys, in order to ensure viability. This would be contrary to the <del>predominate</del> <del>predominant</del> character of the Borough which is two -three storey in suburban locations and three to four storeys with the town centres and near transport hubs, which means locations outside of the Opportunity Area, <del>and</del> District Town Centres <del>and near transport hubs</del> are not likely to be suitable for Build to Rent Developments. Overall, the proposed policy approach will minimise any potential harmful effects on the character areas of the Borough and ensure viability of potential development proposals.</p>
<p><b>Chapter 10:</b> Transport and Movement / Policy M2: Parking, page 281</p>	<p>Although we support the requirement that car parking should not exceed the maximum London Plan standards, the wording of the policy needs to be clearer on this point and should also encourage car-free development in well-connected locations. We also support the provision of cycle parking in line with the minimum London Plan standards.</p> <p>Regarding paragraph H, we consider that a more positive approach should be taken to reducing public car parking, including commuter</p>	<p>We maintain our representations on the left, which have not been addressed.</p>

	<p>car parking at Underground Stations where journeys can be shifted to more sustainable means: active walking and cycling, and use of buses.</p>	<p>In <b>paragraph 10.2.2</b> additional text has been inserted and it is not clear to us what the link is between providing minimal car parking to support additional family housing. This needs to be explained in the supporting text if not the policy. Or if there is no such link, it should be deleted, subject to a general presumption that car parking should be minimised in line with the ambitions for healthy lives and healthy streets, vibrant communities for all and greener travel options.</p>
<p><b>Chapter 11:</b> Site Allocations / Site Ref: <i>OA2 – Harrow on the Hill Underground and Bus Stations</i>, pages 291 and 297 - 299</p>	<p>See attached 'call for sites' form.</p>	<p>We welcome the inclusion of this site allocation covering TfL / Places for London's landholdings. The proposals are in line with our 'call for sites' submission at Regulation 18 stage.</p> <p>The draft site allocation recognises the potential for a landmark mixed use development, noting the site location within a tall building zone and its close proximity to a number of recently constructed high density mixed use schemes. This is appropriate given the location within Harrow Metropolitan Town Centre and OA and PTAL 6b which is the highest level of connectivity. The overall approach is considered sound and in line with the NPPF and London Plan objective to make best use of land and enable higher density development in accessible locations.</p> <p>The objective to deliver an enhanced transport hub with improved accessibility (including step-free access from the southern station entrance) and appropriate public transport capacity improvements, including a modernised bus station, is also strongly supported.</p> <p>The development requirements and principles are supported, in particular, the aim to deliver improved and more successful public</p>

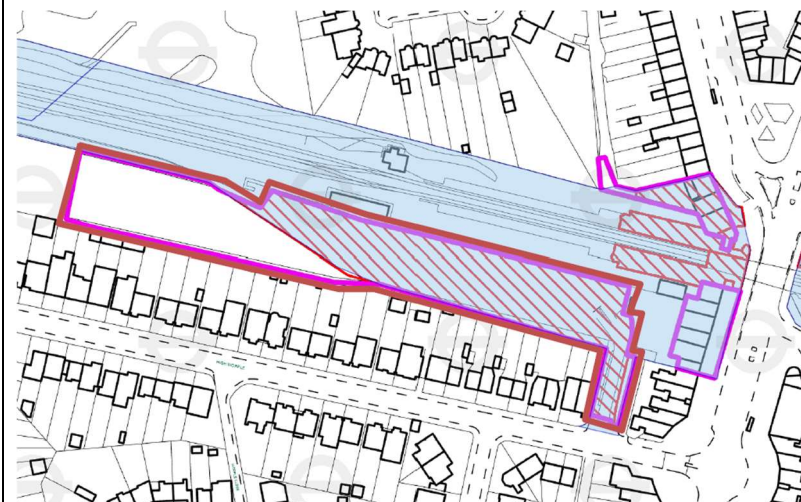
		<p>realm on both sides of the station including enhanced connectivity from station into Harrow Town Centre.</p> <p>It should be noted that the redevelopment of the site provides the opportunity to significantly enhance the northern section of Lowlands Recreation Ground as part of a successful, design-led, high-density development. Given the depth of the surface car park plot, it may be necessary for a limited amount of development footprint or supporting structural columns to move slightly to the south and moderately protrude into the open space and designated Metropolitan Open Land (MOL). In design terms, this would enable any future scheme to successfully respond to the site allocation objectives in terms of improved public realm by introducing active frontages, natural surveillance and enhancing the overall arrival experience at the southern side of the station and sense of safety, particularly after dark. Any loss of MOL / public open space would need to be fully justified in terms of very special circumstances and mitigated, in line with the London Plan and NPPF.</p> <p>Consideration could be given to adding reference to improving the edge of the Lowlands Recreation Ground by siting development blocks and active frontages at its northern end. This could be added to the development principles and flagged as a key development / design objective for the site allocation.</p> <p>Overall, we welcome the opportunity to work positively and collaboratively with the Council to bring forward a viable and deliverable high quality scheme in this location which provides the type of transformative regeneration and transport benefits envisaged in the site allocation.</p>
<p><b>Chapter 11:</b> Site Allocations / Site</p>	<p>See attached 'call for sites' form.</p>	<p>We welcome the inclusion of this site allocation covering TfL / Places' landholdings as well as Council-owned land to the west. However,</p>

Ref: O7 – Rayners Lane Station Car Park, pages 293 and 353 - 355

there are a number of issues that render the draft SA to be undeliverable in its current form. Therefore the Plan would not be sound unless amendments are made.

### Site Boundary and Area

The site boundary is incorrect; we do not propose to redevelop the single storey commercial fronting Alexandra Avenue. The correct red line boundary is below (and please see our 'call for sites' form for further information).



The correct site area is 0.75 ha.

### Allocated Use

The "leading land use" for the correct site is specified as "Residential, car parking". If this site is redeveloped as a housing opportunity,

		<p>Places will not provide replacement car parking and therefore this reference should be deleted. We suggest that the 'Allocated use' is changed to:</p> <p><b>Leading land use</b> Residential Limited replacement car parking with the aim to reprovide only where essential, for example for disabled persons or operational reasons</p> <p><b>Supporting (or Alternative) land use(s)</b> Town centre uses <del>(eastern part of site only)</del> Class E / industrial / warehousing</p> <p>This approach to car parking reflects the site's highly accessible location and will encourage the use of public transport and active modes of travel. It is an approach to the development of station car park sites that has been accepted by the Local Plan Inspectors at the adjoining borough of Barnet. In addition, it is an approach accepted on appeal in respect of TfL car park development opportunities, as resulting in a significant reduction in local vehicular traffic and having an overall beneficial impact (eg. Arnos Grove, ref: APP/Q5300/W/21/3276466, paragraph 35).</p> <p>Our 'call for sites' form explains that at the present time it is not believed that housing development will be viable at this site. Therefore, alternative or complimentary uses should also be allocated in order that this underused site can be optimised and brought into use. Potentially the site may also be suitable for Class E and / or industrial / warehousing / logistics uses, either as an alternative to housing development, or as part of a housing-led, mixed-use scheme. The Council may wish to add reference to Transport Assessment,</p>
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		<p>vehicle tracking and ‘agent of change’ principles to ensure that any impacts for local residents are addressed and mitigated.</p> <p><b>Indicative Residential Capacity</b></p> <p>The ‘Indicative residential capacity’ is said to be “69 dwelling houses / units”. This would not optimise the development opportunity provided by this underused site. Development at such low density would also not be viable, particularly given existing use value of the car park. In our ‘call for sites’ form, we estimate the site has capacity for 100 – 130 new homes (likely flats – we would not build houses here). As a benchmark, the 2016 (now superseded) version of the London Plan’s Table 3.2 <i>Sustainable residential quality density matrix</i> suggests that the upper end of suitable density here would be in the region of 157 – 221 homes (185 – 260 u/ha)<sup>3</sup> and the median range would be between 98 and 140 homes (115 - 165 u/ha). The SA capacity of 69 homes is clearly not in line with the adopted London Plan requirements of policies D1, D3 and H1 to make the best use of land and optimise the capacity of sites. It must be increased substantially for the Plan to be ‘sound’.</p> <p><b>Requirements</b></p> <p>The SA Requirements will also need to be substantially amended:</p> <p style="text-align: center;">     Deliver high quality residential development      Re-provision of <del>an appropriate level station car parking to help meet need generated by commuters</del> limited replacement   </p>
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<sup>3</sup> Based on PTAL 4-5 and the site being in an urban location (ie. predominantly dense development, mix of different uses, medium building footprints, typically buildings of two to four storeys and located on a main arterial route).

		<p>car parking with the aim to reprovide only where essential, for example for disabled persons or operational reasons</p> <p><del>Provide step-free access to Rayners Lane Station</del></p> <p><del>————Contribute towards the provision of step-free access to Rayners Lane Station commensurate with the quantum of development</del></p> <p>Step free access (SFA) would not be necessary to make such a small-scale residential development (100-130 homes) acceptable in planning terms and would not be viable in association with such a small scheme. We would, of course, be happy to make a contribution towards SFA commensurate with the scale of development. Please note that Rayners Lane is <u>one of nine tube stations shortlisted for the next phase of SFA work on the network</u> and this is entirely independent of any development on the car park site.</p> <p><b>Development Principles</b></p> <p>The Development principles will need to be amended to reflect the above. We suggest:</p> <p style="padding-left: 40px;">Paragraph 2: delete (retail units fronting Alexandra Avenue are not part of the development site)</p> <p style="padding-left: 40px;">Paragraph 3: delete (car parking will not be reprovided on site or elsewhere)</p> <p><b>Conclusion</b></p> <p>Without the suggested changes, the SA would not optimise the capacity of the site or enable viable development; the Plan would not have been positively prepared and this aspect of the Plan would not be sound.</p>
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<p><b>Chapter 11:</b> Site Allocations / Site Ref: <i>O20 – Canons Park Station Car Park</i>, pages 293 and 381 - 382</p>	<p>See attached 'call for sites' form.</p>	<p>We welcome the inclusion of this site allocation covering TfL / Places for London's landholdings. However, similar to our representations on the Rayners Lane SA above, there are a number of issues that render the draft SA to be undeliverable in its current form and the Plan would not be sound unless amendments are made.</p> <p><b>Site Objective</b></p> <p>The Site Objective seeks "<i>housing development which improves access to Canons Park station</i>". There is no physical or operational adjacency between this site and the underground station and housing development could not directly contribute to improving access to the station; this reference should be deleted. In addition, Places will not provide replacement car parking and therefore the reference to "<i>providing a sufficient level of car parking associated with the station and the development itself</i>" should also be deleted. We suggest the Site Objective is changed to:</p> <p style="text-align: center;">Housing development which <b>makes the best use of the land and optimises the capacity of the site. improves access to Canons Park Station, while providing a sufficient level of car parking associated with the station and the development itself.</b></p> <p><b>Allocated Use</b></p> <p>The "<i>leading land use</i>" for the site is specified as "<i>Residential, car parking</i>". If this site is redeveloped as a housing opportunity, Places will not provide replacement car parking and therefore this reference should be deleted. We suggest that the 'Allocated use' is changed to:</p> <p style="text-align: center;"><b>Leading land use</b> Residential</p>
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Limited replacement car parking with the aim to reprovide only where essential, for example for disabled persons or operational reasons

This approach to car parking reflects the site's accessible location (close to the station and bus routes along Whitchurch Lane) and will encourage the use of public transport and active modes of travel. It is an approach to the development of station car park sites that has been accepted by the Local Plan Inspectors at the adjoining borough of Barnet. In addition, it is an approach accepted on appeal in respect of TfL car park development opportunities, as resulting in a significant reduction in local vehicular traffic and having an overall beneficial impact (eg. Arnos Grove, ref: APP/Q5300/W/21/ 3276466, paragraph 35).

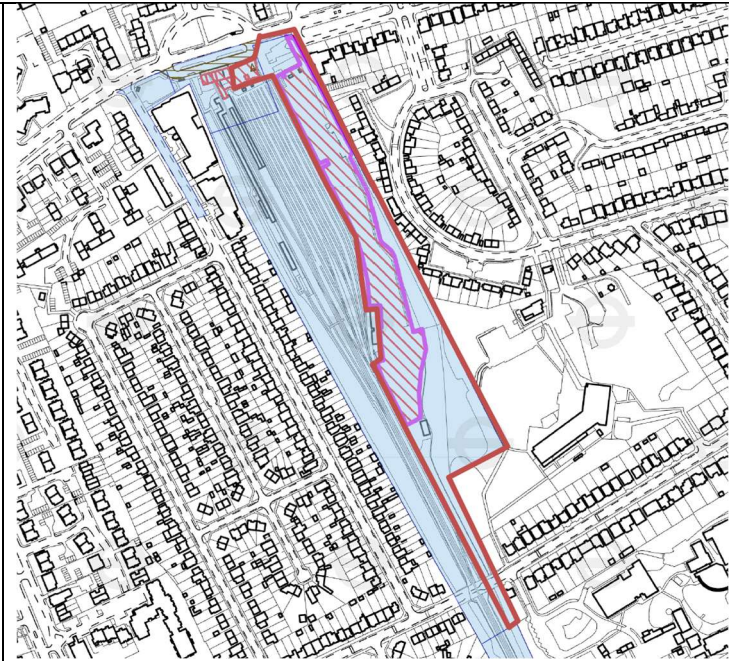
#### **Indicative Residential Capacity**

The Indicative Residential Capacity' is said to be "26 C3 dwelling houses / units". This would not optimise the development opportunity provided by this underused site. Development at such low density would also not be viable, particularly given existing use value of the car park. In our 'call for sites' form, we estimate the site has capacity for 100 new homes (likely flats – we would not build houses here).

As a benchmark, the 2021 planning application (LBH ref: P/0858/20) would have provided 118 affordable homes within three x seven storey buildings. Removing one storey (ie. down to six storeys) would provide 104 homes. Removing two storeys (ie. down to five storeys) would provide 84 homes. And removing three storeys (ie down to four storeys) would provide 64 homes. All far in excess of the draft SA 'indicative residential capacity'. In reality, a new scheme for this site (which would not include replacement commuter car parking) would

		<p>likely deliver deeper floor plates, larger building footprints and enhanced landscaping / setting; potentially enabling delivery of approximately 100 homes within shorter buildings. The SA capacity of 26 homes is clearly not in line with the London Plan requirements of policies D1, D3 and H1 to make the best use of land and optimise the capacity of sites. It must be increased substantially for the Plan to be 'sound'.</p> <p><b>Development Principles</b></p> <p>The Development Principles will need to be amended to reflect the above. We suggest the following amendments to Paragraph 1:</p> <p>The site is suitable for <del>partial</del> residential development with <del>retention of an appropriate amount of</del> station car parking <del>reprovided only where essential, for example for disabled persons or operational reasons. to help meet demand generated by commuters. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the retention or re-provision of car parking capacity on the site or elsewhere.</del></p> <p><b>Conclusion</b></p> <p>Without the suggested changes, the SA would not optimise the capacity of the site or enable viable development; the Plan would not have been positively prepared and this aspect of the Plan would not be sound.</p>
<p><b>Chapter 11:</b> Site Allocations / Site Ref: O22 – Stanmore Station Car Park,</p>	<p>See attached 'call for sites' form.</p>	<p>We welcome the inclusion of this site allocation covering TfL / Places for London's landholdings. However, similar to our representations on the Rayners Lane and Canons Park SAs above, there are a number of</p>

<p>pages 293 and 385 - 386</p>		<p>issues that render the draft SA to be undeliverable in its current form and the Plan would not be sound unless amendments are made.</p> <p><b>Site Boundary and Area</b></p> <p>The site boundary is incorrect. The land potentially available for development is more extensive than the Council shows. Although some of the land to the south east comprises SINC, this is within our ownership and may be utilised for amenity purposes, and / or act as a landscape setting for development and / or some of this land may be required to enable operations to continue at Stanmore station but any loss of SINC would be mitigated. The correct red line boundary is below (and please see our 'call for sites' form for further information).</p>
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The correct site area is 3 ha.

### Site Objective

The Site Objective seeks *“housing development which improves access to Stanmore station, while providing a sufficient level of car parking”*. In this case, development could help to improve access to the station and the red line should be extended to cover the area of land located to the west of the station entrance building to help enable this.

Places is unlikely to provide replacement car parking and therefore the reference to *“providing a sufficient level of car parking”* should be deleted. We suggest the site objective is changed to:

		<p>Housing development which improves access to Stanmore Station <del>while providing a sufficient level of</del> car parking</p> <p><b>Allocated Use</b></p> <p>The “<i>leading land use</i>” for the site is specified as “<i>Residential, car parking</i>”. If this site is redeveloped as a housing opportunity, Places is unlikely to provide replacement car parking and therefore this reference should be deleted. We suggest that the ‘Allocated use’ is changed to:</p> <p><b>Leading land use</b> Residential <del>Limited replacement</del> car parking with the aim to reprovide only where essential, for example for disabled persons or operational reasons</p> <p><b>Supporting (or Alternative) land use(s)</b> Transport operations Class E / industrial / warehousing / logistics</p> <p>This approach to car parking reflects the site’s accessible location (adjacent to the station and bus routes on the forecourt and London Road) and will encourage the use of public transport and active modes of travel. It is an approach to the development of station car park sites that has been accepted by the Local Plan Inspectors at the adjoining borough of Barnet. In addition, it is an approach accepted on appeal in respect of TfL car park development opportunities, as resulting in a significant reduction in local vehicular traffic and having an overall beneficial impact (eg. Arnos Grove, ref: APP/Q5300/W/21/ 3276466, paragraph 35).</p>
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		<p>Our 'call for sites' form explains that TfL is currently considering the future of this site and may retain it for operational uses associated with the railway – we have therefore suggested 'transport operations' are added as a supporting or alternative use. In addition, commercial uses might be appropriate on the lower floor/s of buildings on this site, or as an alternative to housing development. Reference to Class E / industrial / warehousing / logistics has therefore been added. The Council may wish to add reference to Transport Assessment, vehicle tracking and 'agent of change' principles to ensure that any impacts for local residents are mitigated.</p> <p><b>Indicative Residential Capacity</b></p> <p>The Indicative Residential Capacity is said to be “183 C3 dwelling houses / units”. This would not optimise the development opportunity provided by this underused site. Development at such low density would also not be viable, particularly given existing use value of the car park. In our 'call for sites' form, we estimate the site has capacity for 275 – 300 new homes (likely flats, although a small number of town houses might be appropriate as part of a mix of typologies). As a benchmark, the 2016 (now superseded) version of the London Plan's Table 3.2 <i>Sustainable residential quality density matrix</i> suggests that the upper end of suitable density here would be in the region of 360 – 510 homes (120 – 170 u/ha)<sup>4</sup>. Site capacity is reduced accordingly by part of it comprising SINC, nevertheless the Council's suggested site capacity is far too low and is clearly not in line with the adopted London Plan requirements of policies D1, D3 and H1 to make the best use of land and optimise the capacity of sites. It must be increased substantially for the Plan to be 'sound'.</p>
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<sup>4</sup> Based on PTAL 2-3 and the 3 ha site being in an urban location (ie. predominantly dense development, mix of different uses, medium building footprints, typically buildings of two to four storeys, located within 400m of a District Centre and on a main arterial route).

## Requirements

The SA 'Requirements' will also need to be substantially amended:

~~Deliver high quality residential and / or commercial development if the site is no longer required for transport operations~~

~~Reprovision of suitable level of car parking for commuters and in connection with major events at Wembley Stadium~~

Contribute towards the provision of step-free access to Stanmore Station commensurate with the quantum of development

Step free access (SFA) would not be necessary to make such a relatively small-scale residential development (up to 300 homes) acceptable in planning terms and is unlikely to be viable in association with such a small scheme. However, development adjacent to the station could safeguard land and help to enable improved SFA. We would, of course, also be happy to make a financial contribution towards SFA commensurate with the scale of development.

## Development Principles

The '*Development principles*' will need to be amended to reflect the above. We suggest the following amendments to Paragraphs 1 and 2:

The site is suitable for ~~partial~~ residential development and / or commercial development potentially including Class E / industrial / warehousing / logistics. ~~with appropriate amount of station car parking to help meet demand generated by commuters and in connection with major events~~ ~~reprovision of an~~

		<p><del>at Wembley stadium. Any planning application for the redevelopment of the site should be supported by evidence of car parking demand and show how that demand will be met by the re-provision of car parking capacity on the site or elsewhere.</del></p> <p>Redevelopment of the site should <del>enable facilitate</del> step-free access to Stanmore Station, both from London Road and from the retained or replacement car-parking facility.</p> <p>To reiterate, the development of this site is unlikely to be able to pay for SFA in two locations; however, we would seek to enable it by safeguarding parts of the site that would be needed. We would also be happy to make a financial contribution towards SFA commensurate with the scale of development.</p> <p><b>Conclusion</b></p> <p>Without the suggested changes, the SA would not optimise the capacity of the site or enable viable development; the Plan would not have been positively prepared and this aspect of the Plan would not be sound.</p>
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