Outlook

Local Plan - Regulation 19

From [redacted]
Date Sun 08/12/2024 19:18
To local.plan@harrow.gov.uk <local.plan@harrow.gov.uk>

Dear Sir/ Madam,

My name is **Ms NajmaKazi** and I reside at
[redacted]

I wish to register my opposition to the **Local Plan-Regulation 19** that has been recently proposed by Harrow Council and which I find completely inappropriate for a quiet residential area like central Harrow. This plan puts the interests of developers first and the interests of residents last. There is no benefit in this plan for the local residents.
Please find below my response to the plan including a policy by policy rebuttal and counter proposals for each policy. Where policies have a common rebuttal and counter proposal I have grouped the policies together along with my response.

Strategic Policy 01: High Quality Growth

Policy GR3A: Inclusive Design

Policy GR2: Inclusive Neighbourhoods

Policy GR1: Achieving a High Standard of Development

The current policy for the Harrow and Wealdstone Opportunity Area is fundamentally flawed, prioritizing the interests of developers over those of residents. It has led to overdevelopment, strained infrastructure, and a loss of local character, offering no meaningful benefits to the community. Key issues include:

- The Harrow and Wealdstone Opportunity Area has been allocated an unfair share of growth, shouldering a disproportionate burden despite comprising only 1.3% of the borough's total area.
- Since 2013, over 3,500 housing units have been delivered, with capacity targets escalating from an initial 2,900 to 9,352—far exceeding the 5,000 homes recommended in the London Plan 2021.
- If this trajectory continues, nearly 13,000 homes will be built by the plan's end, causing severe overdevelopment and further degrading residents' quality of life.
- Infrastructure in and around the Opportunity Area is already strained, resulting in frequent power cuts and worsening living conditions for residents.
- Past regeneration efforts have benefited developers rather than residents, leaving the area rundown, dirty, and unappealing despite over a decade of 'regeneration.'
- The Opportunity Area is unsuitable for high-density development due to its proximity to low-rise residential neighbourhoods, unlike other Opportunity Areas such as Wembley or Brent Cross, which are self-contained and built on former industrial land.
- Promises of "design-led development" remain unfulfilled, with new projects failing to integrate with or enhance the local character, further eroding Harrow's distinctive Metroland identity promised in the original plan.
- The current approach prioritizes developer profits, offering no tangible benefits to the community while exacerbating inequality and declining living standards.

Proposal

- Cap the Opportunity Area's capacity at 5,000 homes, as outlined in the London Plan 2021, and allocate remaining sites for family housing that complements the low-rise character of the area.

- Halt the indefinite increase in housing targets, as additional development serves only developers' interests, not those of Harrow residents.

Strategic Policy 03: Meeting Harrow's Housing Needs

The current policy is unsound as it fails to address the borough's critical housing needs and prioritizes developments that benefit developers over residents. Key issues include:

- The council has made minimal progress in constructing family-sized social rent homes, despite the pressing need for such housing in the borough.
- There is no clear indication that the council can deliver the required number of genuinely affordable homes.
- A significant portion of new housing consists of flats, which do not meet the demand for family-oriented housing.
- The policy conflates social rent homes with 'affordable' rent homes, two distinct categories. Social rent homes are typically more affordable than intermediate housing, yet the policy obscures the actual provision of these critical homes.
- Residents are increasingly frustrated by the focus on 'luxury flats,' which do not address the housing crisis and fail to serve the local community's needs.

Proposed Change:

- Refocus the policy to prioritize the development of family-sized social rent homes that directly address the housing crisis.
- Avoid the construction of additional 'luxury flats,' as these do not benefit residents or contribute to solving the housing challenges in Harrow.
- Ensure transparency in housing categorization, clearly distinguishing between social rent and other forms of 'affordable' housing to provide an accurate picture of progress.

Strategic Policy 06: Social and Community Infrastructure and Harrow Infrastructure Delivery Plan

The policy is unsound, as it prioritizes developer interests over the needs of residents, leaving critical infrastructure issues unresolved. Key concerns include:

- Infrastructure details remain insufficient, with no dedicated funding and reliance on developer contributions, which are often circumvented.

- The development strategy around Harrow and Wealdstone transport hubs assumes increased commuter use but fails to create attractions or amenities for local residents.

- Harrow Leisure Centre and Hatch End swimming pool are nearing the end of their lifespan, yet there are no funded plans or identified sites for their replacement.

- Healthcare infrastructure is inadequate, with a shortfall in GP capacity that is not addressed, despite rising demand from population growth and aging demographics.

- The 2022-2030 Harrow Health and Wellbeing Strategy highlights significant health inequalities, with poorer neighbourhoods experiencing life expectancy more than four years shorter than wealthier areas.

- Service gaps in healthcare provision, particularly in central Harrow and the Opportunity Area, will worsen with further development unless mitigated.

- Water supply faces a predicted shortfall, with no actionable strategy beyond expecting residents to reduce consumption through measures like retrofitting and water metering.

- The electricity grid is under severe strain due to high-density development, causing unplanned power outages, with at least five incidents already reported in 2024. No strategy exists to address this growing issue.

- Population growth in the Opportunity Area is projected to significantly outpace all other wards, yet it remains the most densely populated and least equipped to meet existing infrastructure demands.

- The Infrastructure Delivery Plan lacks secured funding for necessary projects, leaving residents without assurance that their current or future needs will be met.

Proposed Change:

- Establish a clear and dedicated funding plan for infrastructure improvements, independent of unreliable developer contributions.

- Prioritize replacing Harrow Leisure Centre and Hatch End swimming pool with well-located, modern facilities.

- Develop a comprehensive healthcare strategy to address GP shortfalls, particularly in areas of high deprivation and the Opportunity Area, and invest in expanding primary and secondary care services.

- Implement actionable strategies for water and electricity infrastructure, ensuring the grid can support current and future populations.

- Reassess development focus in the Opportunity Area to avoid further strain on an already overstretched infrastructure, instead distributing growth more evenly across the borough.

The current approach benefits developers while neglecting the pressing infrastructure needs of Harrow's residents, worsening their quality of life.

Policy GR4: Building Heights

Policy GR3: Public Realm and Connecting Places

The policies are unsound, as they prioritize developer interests over strategic planning and community concerns, leading to inconsistencies and negative impacts on Harrow's character and public realm. Key issues include:

- The Harrow and Wealdstone Opportunity Area Tall Buildings Study highlights sites near Harrow-on-the-Hill Station and Harrow and Wealdstone Station as most suitable for tall buildings, yet these locations are limited to 12 stories. Conversely, the Tesco site, with a lower suitability score, is designated for 15 stories despite being outside the town centre, close to low-rise suburban areas, farther from train stations, and lacking nearby green spaces. This discrepancy lacks clear justification.

- The Station Road sub-area is deemed unsuitable for tall buildings in the council's study, yet proposals allow for buildings up to 18 stories, contradicting its findings.

- Past developments like Harrow Square and Harrow One are cited as poorly executed tall buildings, creating wind tunnels and inadequate public realm amenities. Allowing additional tall buildings in unsuitable areas risks repeating these mistakes.

- The council claims to retain the human scale of Station Road, but proposals permitting heights beyond 7 stories contradict residents' preferences and the study's recommendations.

- The process for determining building heights is opaque and appears to favor developer requests over thoughtful urban design or community interests.

Proposed Change:

- Reassess the decision to designate the Tesco site for tall buildings, ensuring zoning aligns with the Tall Buildings Study's suitability findings.

- Adhere to the study's recommendation of a maximum height of 7 stories for Station Road, respecting the community's preferences and preserving its human scale.

- Ensure greater transparency in the methodology for determining building heights, prioritizing strategic planning and the area's character over developer demands.

- Avoid repeating past mistakes by restricting tall buildings in areas identified as unsuitable, focusing on creating liveable public spaces and maintaining Harrow's identity.

As currently framed, these policies favour developers at the expense of residents, jeopardizing the character and liveability of Harrow's built environment.

Policy GR12: Site Allocations

The policy is unsound, as it prioritizes developer interests over thoughtful planning and fails to address residents' needs or the area's capacity. Key issues include:

- The site allocations for Station Road have been significantly increased without clear justification, suggesting a developer-driven approach. For example:

- The Tesco site allocation (site-OA7) has jumped from 14 to 500 flats, despite being located in a protected view area, outside the Town Centre, and adjacent to low-rise residential neighbourhoods not within the Opportunity Area.

- The Civic Centre allocation has risen from 300 to 1,139 units compared to the 2013 Local Plan.

- The Tesco site has a Public Transport Accessibility Level (PTAL) of 3-5 and backs directly onto residential areas outside the Opportunity Area, raising concerns about its suitability for high-density development.

- These changes appear to reflect a target-driven "anything goes" mind-set rather than realistic capacity assessments, particularly within the Opportunity Area.

- Most of the Opportunity Area has been re-designated for developments like Shared Living, which fail to address the borough's critical shortage of social rented and family-sized housing.

Proposed Change:

- Reassess the density levels permitted in Station Road, adhering to the findings of the council's tall buildings study and prioritizing the preservation of its low-rise character.
- Clarify the council's long-term vision for the Harrow and Wealdstone Town Centres, explicitly stating whether merging them into a single center is a planned outcome.
- Prioritize the original goals of enhancing public spaces, connectivity, and character preservation within the Station Road sub-area.

The current policy disproportionately benefits developers, undermines local character, and neglects the urgent need for housing that meets residents' requirements.

Strategic Policy 05: Harrow & Wealdstone Opportunity Area

The policy is unsound, as it contradicts previous planning objectives and fails to address the unique challenges of the Station Road sub-area. Key issues include:

- The Station Road sub-area's role, as outlined in the 2013 plan, has become unclear. Initially intended to:
  - Maintain a low-rise profile, serving as a buffer between the Harrow and Wealdstone Town Centres.
  - Improve public spaces and connectivity while preserving its unique character.
  - Remain unsuitable for high-density development to avoid congestion and merging the two centers into a single entity.
- The current plan permits 18-storey buildings in Station Road, despite:
  - The area being identified in the council's tall buildings study as unsuitable for high-density development.
  - Its designation as an air quality management area, which makes dense housing unwise due to pollution and congestion concerns.
- The approval of high-density development contradicts the claim to harmonize with lower-density suburbs and risks blending Harrow and Wealdstone into one indistinguishable town center—a move not explicitly stated by the council but seemingly enabled by the policy.

Proposed Changes:

- Reassess the density levels permitted in Station Road, adhering to the findings of the council's tall buildings study and prioritizing the preservation of its low-rise character.
- Clarify the council's long-term vision for the Harrow and Wealdstone Town Centres, explicitly stating whether merging them into a single center is a planned outcome.
- Prioritize the original goals of enhancing public spaces, connectivity, and character preservation within the Station Road sub-area.

This policy as it stands appears to prioritize high-density development at the expense of strategic urban planning, undermining the area's distinctiveness and quality of life for residents.

Policy HO9: Large-Scale Purpose-Built and Conversions for Shared Living

Policy HO10: Housing with Shared Facilities (Houses in Multiple Occupation)

The policies are unsound as they fail to address the borough's critical need for social rent and affordable family homes while disproportionately burdening the already densely populated Opportunity Area. Key issues include:

- There is a well-documented shortage of social rent and genuinely affordable family homes for purchase, yet the council has not sufficiently regulated the proliferation of Build to Rent and shared living developments, which are not legally required to include affordable housing.
- Concentrating large-scale purpose-built shared living and Build to Rent developments in the Opportunity Area unfairly increases density in an area already struggling with infrastructure pressures.
- These policies ignore the potential benefits of distributing such developments more evenly across the borough, particularly near the borough's ten train stations, which could better accommodate population growth and reduce the strain on the Opportunity Area.

Proposed Changes

- Introduce stricter regulation on the number and type of Build to Rent and shared living developments to ensure they contribute to meeting the borough's affordable housing needs.
- Distribute large-scale purpose-built shared living and Build to Rent developments more evenly across the borough, prioritizing locations near train stations to take advantage of existing transport infrastructure.
- Reduce the focus on the Opportunity Area for these developments, alleviating density and infrastructure challenges in that region.

These policies, as currently implemented, fail to address the borough's most pressing housing needs and disproportionately burden the Opportunity Area, ultimately benefiting developers at the expense of residents.

Strategic Policy 04: Local Economy

The policy is unsound as it lacks a clear, actionable strategy for job creation in the borough and the Harrow & Wealdstone Opportunity Area. Key issues include:

- There is no defined plan for creating the 1,000 jobs promised in the Opportunity Area.
- The council has not demonstrated active engagement with potential employers to attract investment or establish new businesses in the local economy.
- The plan does not outline any actions or initiatives requested by employers to facilitate job creation within the Opportunity Area.
- Unlike the housing strategy, the policy lacks a long-term, 20-year roadmap for job creation, leaving the economic growth strategy vague and unstructured.
- The plan fails to address how it will recover jobs recently lost in the area, such as those at the council, Debenhams, and through the conversion of office spaces into residential accommodation.

Proposed Changes

- Develop a detailed, long-term job creation strategy, similar to the housing strategy, to ensure sustainable economic growth over the next 20 years.
- Actively collaborate with potential employers to understand their needs and attract investment to the area.
- Include concrete actions and partnerships in the plan to support job creation, with specific targets and timelines.
- Address job losses by encouraging new business ventures and retaining existing employers to stabilize and grow the local economy.

As it stands, this policy lacks the focus and planning necessary to foster meaningful economic recovery and growth, leaving the area without a clear pathway to achieving its employment goals.

Responses from Draft Local Plan Regulation 18 Consultation

The council's approach is unsound, as it dismisses the concerns of residents within the Opportunity Area while prioritizing input from developers and external organizations. Key issues include:

- Feedback from residents within the Opportunity Area has been largely overlooked, with changes to the plan only reflecting input from those outside the area or from non-residential organizations, including developers.

- The housing target for the Opportunity Area has been increased from 7,500 to 8,750 units since the Regulation 18 Consultation, despite residents consistently expressing that 7,500 units were already excessive.

- This disregard for local concerns undermines the council's claim of 'Putting Residents First,' raising doubts about whose interests the plan is truly serving.

Proposed Changes

- Ensure that feedback from residents within the Opportunity Area is given equal weight and addressed transparently in revisions to the plan.

- Reassess the increased housing target, prioritizing community concerns and limiting development to sustainable levels that align with local preferences.

- Establish a clear framework to balance the interests of residents and developers, ensuring that community needs are not sidelined in favor of external influences.

The current approach undermines trust in the council's commitment to its residents, prioritizing development targets and external interests over the well-being of the community.

Yours sincerely,

Ms Najma Kazi,