



Feedback on the new Local Plan

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Caution: External email

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Strategic Policy 01: High Quality Growth

Policy GR1: Achieving a High Standard of Development

Policy GR2: Inclusive Neighbourhoods

We do not believe that these policies are sound.

We are concerned that the development of the relatively small Opportunity Area is excessive. Beyond the narrow strip of Station Road between Harrow Town Centre (Greenhill) and Wealdstone, are streets of low density housing, mostly semi-detached two-storey houses. The tall buildings proposed for Station Road will overshadow these streets, literally in the case of streets closest to Station Road, such as Hamilton Road. Other similar areas of the Borough are being protected from development. This is unfair. Why should the residents of the suburban housing near to Station Road be subjected to a hugely disproportionate degree of development?

As we understand it, upwards of 9000 housing units are planned. Given that the overall target for the Borough is 16 000, the concentration of nearly 70% in an area that is less than 1.5% of the total is grossly disproportionate. Moreover, in the 2021 London Plan the capacity of the Opportunity Area was deemed to be 5000, well short of the 9000+ envisaged in the Local Plan.

We are not saying that there is no case for development along Station Road. There is no justification, for example, for leaving the area around the present Tesco store as a car park, unused as it is for about 8 hours out of 24. But the heights of the tower blocks proposed for the Tesco site as a whole are out of scale with the general character of the area.

The level of amenity in the Opportunity Area has been declining, in spite of regeneration efforts. The high volume of traffic in both directions on Station Road would be added to by large-scale development. We are of the opinion that the 2021 London Plan had a realistic estimate of the capacity of the Opportunity Area: 5000. This was raised in recent local planning, to 7500, which is already too high. 9000+ is greatly in excess.

Strategic Policy 03: Meeting Harrow's Housing Needs

We do not believe that this policy is sound.

The notion of 'affordable' when applied to homes is unclear. It is impossible to build a large number of homes in the limited confines of the Opportunity Area unless they are all flats in high-rise towers. These are not suitable as family homes, let alone as affordable family homes. There appears to be no number defined of homes for social rent. The construction of high-price or high-rental flats will not address the housing needs of the Borough.

Strategic Policy 03: Social and Community Infrastructure and Harrow Infrastructure Delivery Plan

This policy is not sound as it is short on specific information. Relying on developers to meet infrastructure needs is unwise. Development of the Opportunity Area on the scale envisaged would require considerable investment in the provision of medical centres and schools. The strain on water and electricity supply needs to be addressed. The problems arise because of the concentration of population within the very limited Opportunity Area. It is not clear why other parts of the Borough are not being expected to share in the development of new housing, especially as in many parts the population is expected to decrease (according to Harrow Council's own predictions).

Policy GR4: Building Heights

This policy, too, is unsound. The study of building heights in the Opportunity Area identified sites close to the two ends of the Area (near Harrow-on-the-Hill Station and Wealdstone Station respectively) as the most suitable sites for tall buildings, but the tallest buildings have been proposed for the Tesco site, not one of those regarded as the most suitable. This is an anomaly, as the Council's own Tall Buildings Study states that the middle section of Station Road is not suitable for high-rise building. Even recently constructed buildings at the two ends of the Opportunity Area, where their suitability was deemed to be highest, have been identified as problematic. The plans for the Tesco site need to be reconsidered. As noted above, there is a case for developing the site for housing, but not for the tall buildings the developer has demanded.

Policy GR12: Site allocations

Another unsound policy: there is no justification given for the large increase in the allocations for the Tesco and Civic Centre sites since they were first designated as targets for housing in the plan drawn up in 2013. This large increase has been driven by the profit-seeking demands of developers rather than by the council seeking to respect the desires of local residents to maintain the general character of their neighbourhoods. We are not averse to having additional housing on either of these sites: it is the scale of the proposed developments that is objectionable.

Strategic Policy 03: Harrow & Wealdstone Opportunity Area

We have said enough in our responses above to make it clear that this policy is unsound. The previous plan (2013) made it clear that the Section of Station Road between the centres of Harrow and Wealdstone was to be kept a low-rise area. Reasons given for this apply just as much now: traffic congestion and the danger of building what would be in effect a linear single town centre. As noted in the responses above to Policies GR1 and GR2, either side of Station Road is made up of typical low-rise suburban streets. The sudden transition to a narrow 'Manhattan' then back to suburbia makes no sense architecturally.

Policy HO9: Large scale purpose built and conversions for shared living

Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

These policies are unsound. A main driver of the housing crisis is the lack of affordable homes and homes for social rent. This needs to be addressed by the Council and stricter demands need to be placed on developers to include such homes in their plans on a scale that meets the need. Building more and more luxury or high end flats will not meet housing needs.

Strategic Policy 04: Local Economy

This policy is also unsound as insufficient attention is paid to how the residents of the additional housing are to earn their livings. The figure of 1000 new jobs related to the Opportunity Area has not been backed up by any concrete proposals as to where these jobs are to be found.