



Sent by email: Local.Plan@harrow.gov.uk

17th December 2024

Dear Sir/Madam

We are writing in response to the current consultation on the local plan.

Harrow Law Centre is a charity which provides free legal advice and representation to local residents on a range of matters including housing and public law. We have been contacted by many residents who have become increasingly concerned about the number of major developments concentrated around central Harrow and in Wealdstone.

Affordable housing

Harrow Law Centre regularly represents local people on housing and public law matters including judicial reviews against Harrow Council on housing or other public law matters. We are acutely aware of the need for genuinely affordable housing and the lack of it in Harrow. The decisions taken by the council in major planning applications are intrinsically linked to the shortage of genuinely affordable housing in the Borough and time and again the council has failed to address this need.

Harrow Councilors often site the need for new developments as being essential to address the housing crisis in Harrow. However, we are very aware there are many new developments such as that of Eastman Village at the old Kodak site which, despite becoming available in 2018, remains largely unoccupied. We hear from our clients that the main reason for this is that the rented properties are too expensive, set above the local housing allowance level and the cost to purchase is out of reach for most of those who need housing. In addition we have been informed that the service charge is set to increase to several hundred pounds a month from next year. A further factor is that the homes in these major developments are generally smaller and the demand in Harrow is for 3 and 4 bedroom homes.

A recent report by Nous.co shows the average price for a home in Harrow is £487,978 and that with a 10% deposit a buyer would need a salary of £97,597 to purchase such a property. A simple search of the property market shows that 3-bedroom new build properties in Harrow range from £500,000 to £800,000. These properties are actively marketed as investments rather than homes for those in need. Furthermore, the developers market the properties abroad n as foreign investments to countries such as Singapore. Consequently, despite the vast number of existing

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new developments in Central Harrow they have done nothing to alleviate the housing crisis that we have.

Harrow Law Centre regularly represents residents who are refused housing on the basis that there is no affordable housing for them in Harrow. They are then expected to uproot their families, leave their job and their support networks, and move hundreds of miles away. We also represent clients who have rented properties in new builds but are told they have to leave because the level of rent is above the local housing allowance. It is illogical for the council to continue to allow developments that are unaffordable to most people.

We set out below responses to your specific questions.

Strategic Policy 01: High Quality Growth

Policy GR2: Inclusive Neighbourhoods

Policy GR1: Achieving a High Standard of Development

Are the Policies Sound: No

The growth allocated to the Opportunity Area is disproportionate, placing an undue burden on the poorest areas in Harrow. Since its inception in 2013, it has already produced over 3,500 units. The area is small, comprising sixty-nine hectares compared to the borough's 5,047 hectares. The capacity of the Opportunity Area has been repeatedly revised, from an initial 2,900 units to the current 9,352, accounting for 58.3% of the borough's 16,040 housing target. This area represents only 1.3% of the borough's size, making the situation markedly unfair.

According to the London Plan 2021, the Opportunity Area has a capacity of 5,000 homes and one thousand jobs. By 2029, this number will have been reached, and the London Plan 2021 does not call for an additional 4352 units. There is no rationale for increasing housing in the Opportunity Area. The remaining sites should be developed into proper family housing that aligns with the character of the area and maintains the low-rise nature of Station Road.

If the current trajectory continues, the Opportunity Area will have produced 13,000 homes by the end of the plan period. The area is already overdeveloped, negatively affecting the quality of life for both existing and new residents. Adding more flats will exacerbate this issue. Past regeneration efforts have increased inequality within the borough, with those living near the Opportunity Areas experiencing the most significant decline in living standards due to the strain on existing infrastructure. For example, power cuts have become more frequent in neighbourhoods in and adjacent to the Opportunity Area. Despite 11 years of 'regeneration,' the Opportunity Area appears rundown, dirty, and unappealing, suggesting that the regeneration strategy is not working.

The Harrow and Wealdstone Opportunity Area stands out from other self-contained areas such as Wembley, spanning 239 hectares, and Brent Cross, covering 151 hectares. These areas are located on large plots of land, separate from existing residential neighbourhoods, and are mostly comprised of former industrial sites. As a result, it is unrealistic to expect them to provide the same level of benefits. The Harrow and Wealdstone Opportunity Area encompasses places like Station Road, which borders existing low-rise neighbourhoods where high-density development would not be suitable.

Proposal: Maintain a capacity of 5,000 for the Opportunity Area and allocate the remaining sites for more suitable development. Regulation eighteen initially proposed a capacity of 7,500 for the Opportunity Area, which has since been raised to 9,352. The capacity for this area cannot continue to increase indefinitely.

Policy GR3A: Inclusive Design

The term 'design-led development' has been used a lot in the plan but does not appear have a true meaning. Do you have design templates/ formats which developers must follow? Each of the new developments wants to be an island on its own with no effort made to cohesive look or trying to enhance or blend in with its surroundings. The Metroland identity referred to in the plan has almost been lost.

Strategic Policy 03: Meeting Harrow's Housing Needs

Is the Policy Sound: No

Despite the limited construction of family-sized social rent homes in the borough, there is no indication that the council can supply the necessary number of such homes. Furthermore, a significant portion of the new housing will consist of flats. The council has conflated the provision of social rent homes with 'affordable' rent homes. These two are not necessarily the same and could obscure the actual provision of social rent homes, which are more affordable than intermediate rent/percentage London Rent housing.

Proposed Change: Residents would be more receptive to development if it genuinely addressed the housing crisis. Most residents oppose the construction of additional 'luxury flats'.

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

Is the Policy Sound: No

The details regarding infrastructure remain insufficient. There is no dedicated funding, and there is a reliance on contributions from developers, which are not assured as developers often manage to avoid them. The development strategy of

building homes near Harrow and Wealdstone transport hubs appears to presume that people will utilise the transport hubs to commute to and from Harrow, yet it provides no attractions for residents within Harrow itself. Both Harrow Leisure Centre and Hatch End swimming pool are nearing the end of their functional lifespan and need to be replaced, but there is no funded plan in place for their replacement, nor have any potential new sites been pinpointed.

Several concerning issues surrounding healthcare have been identified, and no meaningful solutions have been proposed. There is a capacity shortfall for GPs, and there is no current strategy to address this shortfall, especially considering the rising population. The Primary Care Strategy for Harrow (Harrow CCG 2018/19 – 2022/23) recognised that the borough has experienced a surge in demand due to an aging population and significant growth that will increase the borough's population by 20,000 people over the next eight years. The 2022-2030 Harrow Health and Wellbeing Strategy emphasizes the specific needs of people living in poverty, noting that "people in our poorest neighbourhoods die more than four years earlier than those in the wealthiest parts of Harrow." This is an additional area of concern due to the lack of GP capacity in these areas. Data analysis has shown that deprivation levels in the borough range from low to very high, with an average deprivation score of 15.03, compared to the England average of 21.67. The strategy outlines specific challenges related to health inequalities, obesity, mental health, and social isolation in Harrow. The existing health infrastructure cannot support new housing developments without securing appropriate mitigation measures. While engagement between the ICB and the council continues to ensure new provisions on regeneration and new development sites, investment in expanding existing primary and secondary care is also crucial. In consultation with the Head of Public Health in Harrow, a clear evidence base for healthcare provision was identified, but there are service provision gaps, particularly in the central area of the borough, including within the Opportunity Area. There is a risk that further development in this area will exacerbate pressure on GPs as the population grows and ages.

The Local Economic Needs Assessment forecasts a shortfall in water supply and suggests demand-side measures such as retrofitting, water metering, and stricter building regulations. With no apparent strategy to tackle the water scarcity, residents are expected to adjust their consumption accordingly.

The Local Economic Assessment's electricity report indicates that the electricity grid is facing considerable strain from high-density development and redevelopment. Consequently, residents in the vicinity of the Opportunity Area have been subject to numerous unplanned power outages. In 2024, there have already been at least five such incidents. The increasing population is likely to intensify these issues. Currently, there is no documented strategy to address this shortfall.

According to the council's data (New Harrow Local Plan - Infrastructure Delivery Plan, page 7), the population will decrease in every ward except for those within the opportunity area, which will see an increase over the next five years as follows: Marlborough will increase by 7,847; Greenhill will increase by 2,777; Headstone South will increase by 962; Harrow on the Hill will increase by 166, totalling 11,752 in five years, and up to 21,000 in 15 years. Given this data, it raises the question of why development would be concentrated in the Opportunity Area when it is already the most densely populated and struggling to meet the infrastructure demands of its current residents.

The New Harrow Local Plan - Infrastructure Delivery Plan indicates that funding for projects has not been sourced. Refer to the table: Harrow New Local Plan 2021-2041 - Infrastructure Delivery Plan (IDP) - Appendix 1 Infrastructure Schedule (as of 28 October 2024). This implies that the issue of infrastructure remains unresolved. Residents demand adequate infrastructure to meet present and future needs.

Policy GR4: Building Heights

Policy GR3: Public Realm and Connecting Places

Are the Policies Sound: No

The Plan indicates that tall buildings are permissible in the Opportunity Area, the criteria used to identify appropriate locations for tall buildings considers their proximity to transport hubs, proximity to existing low-rise areas, and location relative to town centres. The Harrow and Wealdstone Opportunity Area Tall Buildings Study, page 96, shows the highest composite scores for tall building suitability were for sites adjacent to Harrow on the Hill Station and Harrow and Wealdstone Station. However, 12-storey buildings have been designated for sites behind these stations, while the Tesco site, with a lower composite score, has been allocated fifteen storeys. This site is not in the Town Centre, lies close to a low-rise suburban area which is outside of the Opportunity Area, is not near a green space larger than 2 hectares, is farther from the train stations, has a low PTAL, and is near one outlier tall building. The reason for this discrepancy is unclear.

The Council's Tall Buildings Study identifies the Station Road sub area as unsuitable for tall buildings, yet the council permits buildings up to eighteen storeys without clear justification. The Harrow and Wealdstone Opportunity Area Tall Buildings Study, gives Harrow Square as an example of unsuitably sited tall building which has created a wind tunnel and poor public realm amenities. Harrow and Wealdstone Heights in Wealdstone is also cited as a poor example of tall building. Given these past mistakes, is the council not doing the same by allowing tall buildings in areas they deem to be unsuitable?

The council also claims to be retaining the human scale of Station Road, but the proposals are contradictory. Residents have expressed a desire for a maximum building height of seven stories, in line with the study's findings.

The method for determining these heights is not transparent, seeming to reflect developer requests rather than strategic planning.

A proposed change is to reassess why the Tesco site is zoned for tall buildings.

Policy GR12: Site Allocations

Is the Policy Sound: No

The housing allocation for sites on Station Road has been significantly increased: the Tesco site allocation rose from 14 to 500, and the Civic Centre from 300 to 1139 compared to allocations in the 2013 Local Plan. These changes appear to be more driven by developer needs than by actual capacity calculations, suggesting a target-driven 'anything goes' approach, particularly in the Opportunity Area. The Tesco Station Road site, (designated as site-OA7), lies within a protected view area, is not located in the Town Centre, has a Public Transport Accessibility Level (PTAL) of 3-5, and is adjacent to a low-rise area outside the Opportunity Area. It directly backs onto a residential area not within the Opportunity Area, raising questions about its suitability for high-density development of up to five hundred flats. It is proposed to reassess whether such a high-density allocation for the Tesco and Civic Centre sites aligns with the best interests of the residents.

Strategic Policy 05: Harrow & Wealdstone Opportunity Area

Is this Policy Sound: No

The new plan retains the sub-areas outlined in the 2013 plan, each with a designated role. However, the specific role of each sub-area, especially the Station Road Area, has become unclear. The 2013 plan designated the Station Road sub-area to maintain its low-rise profile, acting as a buffer between the densely populated Harrow and Wealdstone Town Centres, with an aim to improve public spaces and connectivity while preserving its unique character. It was considered unsuitable for high-density development due to the risk of congestion and blending into a single town centre. In contrast, the current plan permits 18-storey buildings in this congested and polluted area, which is recognised as an air quality management area and was found inappropriate for dense housing in the council's tall buildings study. The 2024 Plan's approval of high-density development in Station Road, despite its claim to harmonize with the lower-density suburbs, seems unfeasible. This may unintentionally result in the amalgamation of Harrow and Wealdstone into a singular town centre, a move not explicitly stated by the council. It is suggested that the council reevaluate the density levels in line with the tall buildings study and clarify whether they plan to merge Harrow Town Centre with Wealdstone Town Centre.

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

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

Are the Policies Sound: No

There is a general agreement on the lack of Social Rent and truly affordable family homes for purchase. Recent data indicates that Harrow Council initiated only one affordable home between April 2023 and March 2024, despite the construction of thousands of new flats in the Opportunity Area. Therefore, should the Council not enforce stricter regulations on the number of Build to Rent sites and large-scale purpose-built and conversions for shared living, since they are not obligated to provide affordable housing? Moreover, it appears inequitable for the council to limit large-scale purpose-built and conversions for shared living, as well as Build to Rent developments, solely to the Opportunity Area, especially when it is the most densely populated area in the borough.

Proposed Amendment: Permit large-scale purpose-built and conversions for shared living, as well as Build to Rent developments, throughout the Borough, particularly near train stations. With ten train stations in the borough, situating these developments near them could alleviate the strain on the Opportunity Area.

Strategic Policy 04: Local Economy

Is the Policy Sound: No

There is still no clear strategy for creating the one thousand jobs associated with the Opportunity Area. Are there any employers who would be interested in investing here? Is the Council actively collaborating with any employers to create jobs in the local economy. Does this plan reflect any actions or plans that employers have asked for to create jobs in the opportunity area. Where is the 20-year job creation strategy in the plan, like the details about housing creation? How is this plan aiming to recover the jobs lost recently in the area at the Council, Debenhams, and the conversion of office space to accommodation.

Responses from Draft Local Plan Regulation 18 Consultation

The council has completely disregarded the concerns of residents within the Opportunity Area. Changes to the plan have only been made following feedback from residents outside of this area. Additionally, developers and other non-residential organisations have influenced further alterations.

Targets for the Opportunity area have been increased from 7500 to 8750 (with allocation of 9352) since Regulation 18 Consultation, despite residents saying 7500 was too much.

This raises questions about the council's assertion of 'Putting Residents First.'

Regulation 19 Consultation

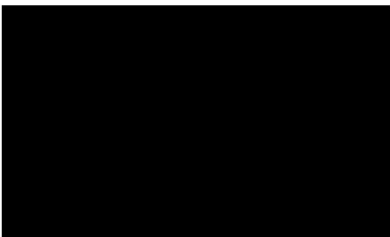
The consultation period of only 6 weeks is totally inadequate.

The six week period to respond is from the 4th of November to the 17th of December. However, those who had previously responded were only notified on the 17th of November, effectively reducing the actual consultation period to four weeks.

Numerous residents have told us that the MS Forms provided were very complex and would be inaccessible for many residents.

We would be grateful if you could confirm that this response will be included in the documents presented to councillors and in the public domain as we have found that previously responses from the Law Centre have been omitted.

Yours sincerely



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Director

Harrow Law Centre