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## Feedback to Local Plan Consultation

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From Pat Beazley [REDACTED]  
Date Mon 16/12/2024 19:32  
To local.plan@harrow.gov.uk <local.plan@harrow.gov.uk>

Caution: External email

1 moved to Harrow as it was an attractive borough, with low rise buildings and a sense of community.

I wish to make the following feedback regarding the above consultation:

### Consultation (Stage 3 Public consultation and Statement of Community Involvement)

- Letters not sent out to residents, instead, the council made announcements on Facebook and the online newsletter. This excludes those that do not have online access. The council should surely write to every household in Harrow.
- Accessibility needs not met. Sign language experts and interpreters were not provided at the face-to-face consultations. No provision for those who do not speak English. 6% of the borough have no or poor English.
- Documents are not easy to read and too long with many contradictions and inconsistencies. Too many supporting documents. Maps are not labelled, making it difficult to understand the areas identified. The colour pallets used on maps are not useful. Have these been tested for those with colour blindness?
- Presentation materials at the face-to-face consultation did not provide sufficient information. They relied on residents being able to ask pertinent questions rather than being given the sufficient information.
- The online survey is superficial and does not give enough information to allow respondents to answer questions sufficiently.
- The council has not offered or considered any other options for development. Has any modelling of other options happened, if so why haven't residents been asked to select from those options. The previous consultation had four options to choose from. Option-High Road and Town Centres were chosen.
- The continuity from the previous plan is not referred to in the new plan. There is no reference to the success or failure of the previous plan. What has been the impact of all the developments to date? What capacity has already been used up? What is the remaining capacity?

### Targets (Strategic Policy 03: Meeting Harrow's Housing Needs and Strategic Policy 01: High Quality Growth)

Total for the borough is 16,040 dwellings in the period 2021 - 2041. 7,500 dwellings will be situated in the Opportunity area.

Can the targets be spread more evenly across the borough 50% in the Opportunity area seems excessive. Even if 35% of the targets were in the Opportunity Area, would that not reduce the densities required in the Opportunity Area? Please can the Council provide an option with a lower percentage of the housing targets in the Opportunity Area?

The council is required to provide a breakdown of allocations by site, so we can see allocations by site. Please can you provide a Site Allocation Document?

**Tall Buildings (Policy GR4: Building Heights, Strategic Policy 05: Harrow & Wealdstone Opportunity Area, Harrow\_and\_Wealdstone\_Opportunity\_Area\_Tall\_Buildings\_Study 5.11 STATION ROAD)**

Tall buildings are to be situated in the opportunity area. The reason given for this is that the Opportunity Area already has tall buildings. However, there are areas (within the Opportunity area) which are still largely low rise such as the Station Road sub area. The suggested heights of 18 and 15 storeys to the Civic Centre and Tesco site are too high. The evidence provided in the Tall Building Study suggests that 7 storeys is considered high in this area and the area is predominantly still low rise and unsuitable for tall building, therefore the maximum height on Station Rd should be 7 storeys.

Given that it seems the council will have met their London Plan 2021 targets without developments on Station Rd, they should model maximum heights of 7 storeys in the Station Rd Area. This would comply with the original Town Plan of keeping Station Road low to medium rise (Option: High Road and Two Town Centres in the 2012 Public Consultation). This was the option chosen by Harrow Residents in the 2012 Consultation.

**Types Of Development (Policy HO1: Dwelling size mix)**

Demographics say families with 32.5% of households being 4+ people. The council needs **more** than 25% of units within new schemes to be family sized. Flats are not suitable for families and the developments in the past decade have mainly been one and two bedroom flats. The plan needs to encourage developers to build the family homes that Harrow needs, not what makes them the most profit.

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

Schools, medical facilities, sports and recreation facilities are mentioned, but no firm numbers, locations or requirements have been provided.

There is no ring fenced funding for infrastructure. The plan relies on CIL payments, which the council does not always collect. For example, the council are now unable to collect 1.4million from the Safari development.

The previous plan had schools and doctor's surgeries located at the Kodak site. These are yet to be built and the site is nearly at capacity. Is there enough space left at the Kodak site to accommodate these? Is there going to be a school at the Civic Centre site?

The council need to pursue funding for infrastructure and not rely on developers who will in most cases try to back out

**Jobs (Job Density, Spatial Strategy, Strategic Policy 05: Harrow & Wealdstone Opportunity Area)**

Harrow has significantly lower numbers of jobs per resident than surrounding boroughs.

There does not seem to be a plan for creating jobs, as most offices have turned into flats.

The Council needs to look into options for creating jobs, otherwise they risk missing the 1000 jobs target.

**Affordable Housing (Policy HO4: Genuinely Affordable Housing)**

The plan suggests 50% affordable housing, based on habitable rooms or floor space

The affordable home quota includes Shared Ownership. There are plenty of unsold Shared Ownership flats in Harrow, which remain empty. Harrow View West and Harrow Heights still have Shared Ownership for sale, years after completion. Please may we have more social housing instead Shared Ownership?

**Protecting the suburbs (Harrow Tall Buildings SPD 2023)**

The council aims to protect the suburbs by directing most of development into the Opportunity area. The suburbs are defined as areas outside the opportunity area, but no protection has been given to the suburban areas adjacent to the opportunity area. The council is proposing tall buildings in these areas. This strategy puts the rights (to a decent standard of living) of Residents living in suburbs above those in and adjacent to the opportunity area.

The council should show that they really put **all** Residents first, by ensuring Harrow is not overdeveloped. Putting a cap of 7 storeys in the station Road area would show they care about the quality of life of all residents.

I would welcome feedback on these comments.

Yours faithfully,

Patricia Beazley,

