

Hearing Statement from Irene Rusike

Matter 6: Site Allocations including the Harrow and Wealdstone Opportunity Area

Strategy Issue 12: Whether the proposed site allocations within the Plan are positively prepared, justified, effective and consistent with national policy and in general conformity with the London Plan

Questions: Strategic Policy 05: Harrow & Wealdstone Opportunity Area

12.1 In what way does the policy wording recognise the interface between the opportunity area and the surrounding lower rise areas?

The wording of policy considers the surrounding low-rise areas; however, context is key. The policy hasn't been applied properly on the Tesco (site OA7) and Civic centre (site OA9) sites as the starting heights are too tall and the sites are hemmed in by low rise building, hence a neighbourly interface will not be achieved.

12.2 Is the policy sufficiently flexible in terms of focusing higher density development to other sustainable locations outside of the Harrow & Wealdstone Opportunity Area?

I do not think there is enough flexibility in terms distributing densities outside of the area. The Characterisation and Tall Building Study EBDH03 (page 99) shows town centres outside of the opportunity are such as Stanmore, Pinner and Hatch End have similar prevailing heights to those in the Station Road Area (EBDH01 page 72), yet Station Road is considered suitable while Stanmore, Pinner and Hatch End have not been.

Other locations near public transport hubs could also be considered as sustainable development sites.

The council's interpretation of the London Plan seems to be that tall buildings are only suitable in opportunity areas. The London Plan Policy D9 part C says they must be in suitable locations, not just in Opportunity Areas. There have been no alternatives given in relation denser development outside the opportunity area.

12.4 Parts D, G and H of the policy address the Harrow Metropolitan Town Centre, Station Road and Wealdstone District Centre respectively. A number of representors have raised concerns regarding the designation of the Station Road area within this policy. Are these concerns justified?

Our concerns are justified. When the Intensification Area was adopted in 2013, residents were told that Station Road would only be included in the Intensification area

boundary to cater for public realm improvements; serving as a boulevard/corridor between the 2 Town Centres (Harrow Metropolitan Town Centre, Station Road and Wealdstone District Centre) . It was not meant for high density development. See ADLP05 policies AAP2, AAP6, AAP4, AAP5 and Chapter 5. **See also Option 4 in linked document: [ID](#) (Apologies for linking to the document, it isn't included in the evidence base)**

Given that no consultation took place when the area changed from an Intensification Area to an Opportunity Area and that the proposed changes will result in the population of Marlborough doubling, residents feel, that the council has not evaluated any other options which might lessen the densification and the impacts of the densification.

Additionally, because of the shape and constrained nature of the Station Road Area, the Opportunity area backs onto the neighbouring suburban area. Residents on Hamilton and Hindes road have the Opportunity a hedge's width from their homes. These suburban areas are not afforded the same protection from 'inappropriate development' as those in other suburban areas.

Residents are also concerned about the Station Road Area being deemed as suitable for tall buildings contrary to the evidence on, page 128 of EBDH01.

The allocations for the Tesco site have gone from 14 to 500. There doesn't seem to be a justification for this given the context of the site and its sensitivity to tall buildings. The same applies to the Civic Centre site which has gone from 300 to 1200.

12.5 Is the approach to the Harrow and Wealdstone Opportunity Area consistent with the London Plan? Concerns have been expressed regarding the capacity of the area to accommodate the growth expected through this Plan period, as well as the impact on the surrounding neighbouring areas. The London Plan identified that the HWOA will accommodate growth for at least 5000 homes and 1000 jobs. Paragraph 2.1.1 advises that when developing policies for development plans, boroughs should use the indicative capacity figures as a starting point, to be tested through the assessment process.

The London plan says 5000, however current target by the council is 8750. This was initially set at 7500 at Regulation 18. These revisions also don't consider that there has already been a lot of development in the Opportunity Area since 2013.

12.7 Is the area as defined within the Plan the same as the London Plan? If not why not?

I have previously asked when the Intensification Area adopted in 2013 became an Opportunity Area; The Harrow and Wealdstone Area Action Plan 2013 (ADLP05) page 134 defines the area as an Intensification Area in the London Plan. Intensification Area designation is different to Opportunity Areas designation in the London Plan. Who was

consulted when the area was designated as an Opportunity Area? Where is the consultation material and evidence? This question has not yet been answered. I have looked at the responses contained in Regulation 22 Report and the answer isn't there.

12.8 Could the Council set out (in a table from) the quantum of growth already accommodated within the area?

Please can this growth be assessed from the inception of the Intensification Area in 2013? The table shown on page 15 of the CSD11 starts from 2019, this misses out all developments since 2013. Showing just from 2019 does not show the total cumulative impact of the development.

Conclusion

The Opportunity Area is already densely developed. Any further development should be sympathetic to areas surrounding the Opportunity Area. Allocation for the Tesco Site and the Civic Centre site need to be sensitive to their context. It is evident that targets for the area cannot continue to rise as capacity and the number of remaining sites cannot accommodate this growth indefinitely, whilst maintaining existing residents' living standards, health, and mental wellbeing. Therefore, the Council should investigate alternatives of other areas in the borough where growth could be distributed.

The council should also consider other ways of achieving density without height.

As it stands, I believe the policy is not sound as adding more growth to the Opportunity area is unsustainable.