

## Hearing Statement from Irene Rusike

### Matter 7 Design and the Historic Environment

Issue 13: Is the approach to Design and the Historic Environment contained within the Plan justified, positively prepared, consistent with national policy and in general conformity with the London Plan?

#### GR4 Building Heights

**13.10 This policy defines a tall buildings zone within the Harrow & Wealdstone Opportunity Area. The evidence base to support this approach is EBDH03 Harrow Characterisation and Tall Buildings Study, 2021.**

EBDH01 (Opportunity\_Area\_Tall\_Buildings\_Study\_\_2024) deals specifically with tall buildings in the Opportunity Area. I have referenced this document to answer Question 13.11. My understanding is that EBDH03 (Harrow\_Character\_and\_Tall\_Buildings\_Study\_2021) establishes the character across the borough and EBDH01 applies the findings to the Opportunity Area through site sensitivity testing to derive suitable locations for tall buildings.

Please see EBDH01 page 6 (How is this Strategy Prepared?) and CSD01 paragraph 2.4.2.

**13.11 Does policy GR4 which addresses tall buildings align with the steps identified within the London Plan at page142/143?**

Step 3.9.2 Says that tall buildings can have detrimental impacts if placed in inappropriate locations, page 128 (Opportunities and Constraints) of EBDH01 says Station Road is not suitable for tall buildings above 7 storeys but then allocates e up to 18 storeys to the Civic Centre on Station Road because there is an opportunity for intensification.

If the area is sensitive to height, why allow tall buildings there in the first place?

Having an opportunity is not justification to allow tall buildings where they are unsuitable. The council are ignoring their own evidence.

**13.12 What is the purpose of the designated tall buildings zones map on page 57 of the Plan and the associated text? Does this replicate what is contained on the policies map?**

This map is from EBDH01, page 110. I have **not** found it in **EBDH03**. As evidence has been provided in the plan from EBDH01, should EBDH01 not be used as supporting evidence for the policy?

### Conclusion

I do not think the policy is sound as it is not justified. It ignores the evidence in EBDH01 which suggests tall buildings are **not** suitable in the Station Road area. The Council could rectify this by changing the appropriate heights in the Station Road area to seven storeys to align with evidence.