

### View results

Respondent

58

Anonymous

10:39

Time to complete

### Part A - Personal Details

We will not be able to accept responses where personal details are not provided.

1. Are you submitting this representation as an individual or on behalf of an organisation? \*

- Individual
- Organisation

2. Title

Mr

3. First Name \*

Ralph

4. Last Name \*

Elliott

5. Job Title (where relevant)

[Redacted]

6. Organisation (where relevant)

Carter Jonas LLP

7. Address Line 1

8. Address Line 2

9. Address Line 3

10. Address Line 4

11. Post Code

12. Telephone Number

13. Email Address \*

### Part B - Your Representation(s)

To which part of the Local Plan does this representation relate? (Please make one representation at a time, you can click to make a further representation - up to a maximum of 10 per form - at the end of this section).

14. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

15. Do you consider this policy sound?

- Yes
- No

16. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy CN1 (Sustainable Design and Retrofitting) requires all new buildings to be designed and built to be Net Zero Carbon in operation. There is additional text within the Regulation 19 Local Plan which requires all new buildings to minimise the use of mains water achieving a maximum consumption of 105 litres per head per day, excluding allowance of up to five litres for external water consumption. This is supported as it provides a clear requirement for new development to be assessed upon.

Sustainability and energy efficiency has always been placed at the heart of Eastman Village and the latter phases would uphold these principles and seek to continue with any relevant planning policy. We strongly agree with the Local Plan policies responding to the Climate and Nature Emergency.

17. Would you like to make another representaion?

- Yes
- No

## Part B - Your Representation(s) (2)

To which part of the Local Plan does this representation relate?

18. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

19. Do you consider this policy sound?

- Yes
- No

20. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

At Part G of Policy GI3, the reduction from 20% to 15% from the Regulation 18 version to the Regulation 19 version of the Local Plan is supported given viability challenges in some areas. Although Part A of Policy GI3 makes reference to development proposals which are exempt from the Environment Act 2021, this is not reiterated in Part G (which sets out the specific BNG requirements for new proposals) which may create confusion during the determination of planning applications which are exempt due, to the inconsistency with the legislation.

Overall, continue to agree with the overall strategy to protect and enhance green and open spaces, improve biodiversity and encourage opportunities for food growing. We also agree to the proposal to seek a greater level of biodiversity improvement from new development, however to ensure that Policy GI3 is consistent with the Environment Act 2021, we suggest the following revised wording to Part G of the policy:

"G. All major and minor development proposals, unless exempt under the Environment Act 2021, must be supported by a proportionate Biodiversity Net-Gain Plan (BGP) which clearly identifies how the development will minimise harm and maximise biodiversity gain..."

21. Would you like to make another representaion?

- Yes
- No

### Part B - Your Representation(s) (3)

To which part of the Local Plan does this representation relate?



22. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

23. Do you consider this policy sound?

- Yes
- No

24. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy GR4 (Building heights) builds upon Strategic Policy 01 by setting out that tall buildings will be directed to designated tall building zones within the Harrow & Wealdstone Opportunity Area. Within the Opportunity Area, a tall building is any building that is 7 storeys or 21m. Outside of the Opportunity Area, there are no designated tall building zones. There is additional text within the Regulation 19 Local Plan which requires tall buildings to provide a design rationale to demonstrate that a tall building is the most appropriate form of development for the site and its context. This additional requirement is supported as it accords with the aim of Chapter 12 of the NPPF to achieving well-designed and beautiful places.

The proposals for Eastman Village include a number of buildings which would be considered tall buildings under Policy GR4, with existing planning permissions enabling the development of buildings up to 18 storeys in height. The Designated Tall Building Zones Map responds to this, with the entirety of Eastman Village located in an area deemed appropriate for buildings up to 18 storeys.

Tall buildings such as those consented at Eastman Village will deliver a significant proportion of the Borough's housing and commercial requirements over the plan period. As such and given the limited availability of land within the Borough, it is considered that the Council's approach to supporting the development of tall buildings within designated zones is one which is appropriate and protects the more suburban character of other areas of the Borough. We therefore continue to strongly agree with the Council's approach to tall buildings within the Harrow & Wealdstone Opportunity Area only.

25. Would you like to make another representaion?

- Yes
- No

### Part B - Your Representation(s) (4)

To which part of the Local Plan does this representation relate?

26. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

27. Do you consider this policy sound?

- Yes
- No

28. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy HO4 (Genuinely Affordable housing) requires the delivery of all affordable housing to be on-site. There is an additional requirement in the Local Plan which was not included in the Regulation 18 version, which sets out that proposals must ensure an initial minimum of 35% of all gross residential development delivered within a scheme to be affordable housing in order to apply for the fast track route, which ensures consistency with London Plan Policy H5. It is noted that development proposals will carry greater planning benefit, where they demonstrably deliver the maximum viable amount of genuinely affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy.

Policy HO4 also requires major residential development to provide a tenure split of 70% low cost rented homes (social rent or as per London Plan Policy H6) and 30% intermediate product homes (London Living Rent or shared ownership). The existing Harrow and Wealdstone Area Action Plan (AAP) required an affordable housing tenure split of 60:40 for sites in the Heart of Harrow (except in the Wealdstone Central sub area) and therefore the 60:40 split was secured in other permissions on the site. It is important that this split is retained for the future certainty of delivery and supply of new homes.

Subject to the Council carrying over this specific requirement for the Heart of Harrow from the AAP into the Local Plan, we would support Policy HO4.

29. Would you like to make another representaion?

- Yes
- No

## Part B - Your Representation(s) (5)

To which part of the Local Plan does this representation relate?

30. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport



- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

31. Do you consider this policy sound?

- Yes
- No

32. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy M2 (Parking) requires development proposals that make on-site provision for parking to be supported where the number of vehicle parking spaces (including those with electric vehicle charging points) complies with the maximum London Plan standards.

The Council must appreciate that on sites with extant planning permissions, the requirement to deliver LCDS compliant cycle parking through the process of discharging planning conditions may reduce the quantum of cycle parking that can be delivered on-site and should ensure that Policy M2 is applied with this in mind.

In summary, we therefore do not have any additional comments to make to those provided at the Regulation 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan.

33. Would you like to make another representaion?

- Yes
- No

## Part B - Your Representation(s) (6)

To which part of the Local Plan does this representation relate?

34. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

35. Do you consider this policy sound?

- Yes
- No

36. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Strategic Policy 01 (High Quality Growth) notes that the Harrow & Wealdstone Opportunity Area is able to accommodate growth and higher density development and thus new development and growth will predominantly be directed into the Harrow & Wealdstone Opportunity Area. Strategic Policy 01 also sets out that the Council will support appropriate tall building developments that are located within designated tall building zones.

As set out in our response to the spatial strategy, it is considered that the Council's approach to focussing development within the Opportunity Area is one which will ensure the most sustainable development patterns for the Borough, and we therefore continue to strongly agree with the overall approach to high quality growth.

37. Would you like to make another representaion?

- Yes
- No

## Part B - Your Representation(s) (7)

To which part of the Local Plan does this representation relate?

38. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

39. Do you consider this policy sound?

- Yes
- No

40. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Strategic Policy 03 (Meeting Harrow's Housing Needs) sets out that the plan will deliver minimum 16,040 homes for the plan period (net), of which at least 8,020 new homes (net) will be delivered between 2019 – 2029. Within the Harrow and Wealdstone Opportunity Area, a minimum of 8,750 homes will be delivered through extant permissions and on allocated sites within the Opportunity Area, an uplift from the minimum of 7,500 homes which was provided in the Regulation 18 version of the Local Plan. At least 50% (8,000) of new homes will be affordable to low-income groups and a minimum of 25% (4,000) of all new dwellings delivered will be three bed or more. We continue to strongly agree with the Council's overall approach to accommodate 16,040 new homes in Harrow by 2041 as it is an evidenced-based approach which will ensure that housing needs are met over the plan period.

41. Would you like to make another representaion?

- Yes
- No

## Part B - Your Representation(s) (8)

To which part of the Local Plan does this representation relate?

42. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)



- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

43. Do you consider this policy sound?

- Yes
- No

44. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Strategic Policy 05 (Harrow & Wealdstone Opportunity Area) sets out that the Council will direct and support development within the Harrow & Wealdstone Opportunity Area, where it assists in the growth and regeneration of the Area, and delivers against the growth potential identified in the London Plan (2021) through the delivery of 5000 new homes and 1000 jobs. Strategic Policy 05 also requires development within the Wealdstone Town Centre to strengthen the vibrancy and vitality of the district centre and improve the environment and identity of Wealdstone as a location for business, industrial activity and family living.

The consented proposals for Eastman Village include both housing and employment generating floorspace which will assist the Council in realising the objectives of Strategic Policy 05. The quantum of housing proposed, the mixture of tenures, and the provision of a variety of non-residential uses will ensure that Eastman Village will contribute to the vibrancy of Wealdstone Town Centre whilst respecting and reinforcing the centre's heritage and character through design and landscaping. The provision of high-quality public realm will assist with reducing the perceived crime and security concerns noted within the supporting text of Strategic Policy 05.

In summary, we therefore do not have any additional comments to make to those provided at the Regulation. 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan.

45. Would you like to make another representaion?

- Yes
- No

## Part B - Your Representation(s) (9)

To which part of the Local Plan does this representation relate?

46. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

47. Do you consider this policy sound?

- Yes
- No

48. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Strategic Policy 06 (Social and Community Infrastructure) sets out that development must contribute to the protection, enhancement and additional provision of; community services and facilities; physical, social, green and blue infrastructure, to adequately address the Borough's existing and future needs.

The Eastman Village development includes public realm and landscape proposals with a rich and distinctive network of routes, streets and other public spaces, including the provision of areas for formal / informal play. CIL and S106 contributions have been used to fund other community infrastructure facilities and will continue do so as further phases of the development come forward. The importance of such facilities cannot be understated, and it is through the continued development of sites such as Eastman Village that the objectives of the policies set out in Chapter 06 will be realised.

In summary, we therefore do not have any additional comments to make to those provided at the Regulation 18 consultation stage. We therefore continue to strongly agree to the approach set out in the Local Plan.

49. Would you like to make another representaion?

- Yes
- No

## Part B - Your Representation(s) (10)

To which part of the Local Plan does this representation relate?

50. To which policy does your representation relate? \*

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

51. Do you consider this policy sound?

- Yes
- No

52. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Strategic Policy 07 (Green Infrastructure) sets out that green infrastructure should be identified, protected, restored, enhanced, and extended. The planning, design, and management of green infrastructure should be integrated, and the context carefully considered to ensure the most appropriate benefits are targeted, maximised and maintained.

As previously set out, the requirement for new development to deliver green infrastructure cannot be understated and it is on sites such as Eastman Village where this delivery can be realised.

Overall, continue to agree with the overall strategy to protect and enhance green and open spaces, improve biodiversity and encourage opportunities for food growing.

### Part C - Demographics

London Borough of Harrow has a legal responsibility to promote and advance equality. To help us to do this, it is important that we have a good understanding of our communities, how our services are being accessed and who is using or would like to use our services. With up-to-date and accurate information we are able to: Better understand our service users / residents and shape services to meet their specific needs, Identify and address any barriers / issues individuals may experience when accessing our services (including information about our services), Ensure our policies and services are accessible to everyone who uses them.

The information will also enable us to monitor our progress with regards to addressing inequality and allow our employees and service users see how we are performing on equality.

Data Protection: It is your choice whether you provide this information. Your replies will not be used in a way that identifies you.

