

**Part B – Please use a separate sheet for each representation**

Name or Organisation:

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

Paragraph  Policy  Policies Map

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4.(1) Legally compliant	Yes	x	No	<input type="text"/>
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4.(3) Complies with the Duty to co-operate	Yes	x	No	<input type="text"/>

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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.

(Continue on a separate sheet /expand box if necessary)

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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...”*

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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.

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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.

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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.

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The spatial strategy for the Borough confirms that the Council will deliver minimum 16,040 homes (net) for the plan period to 2041. Specifically, the Harrow & Wealdstone Opportunity Area will deliver 8,750 additional new homes (an uplift from 7,500 new homes in the Regulation 18 Consultation version Local Plan) and 1,000 additional jobs.

Eastman Village is an established redevelopment site which will continue to deliver housing alongside non-residential uses. It is located within the Harrow & Wealdstone Opportunity Area where the Council is seeking to deliver almost half of its housing need for the plan period. 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 which take advantage of brownfield land located within proximity to existing infrastructure, whilst respecting the more suburban character of other areas of the Borough.

We continue to **strongly agree** with the Council's spatial strategy as set out in the Local Plan.

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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.

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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.

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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.

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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.

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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.

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Strategic Policy 08 (Responding to the Climate and Nature Emergency) sets out all development in Harrow must implement sustainable development practices and positively manage natural capital.

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.

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**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.