

**Harrow and Wealdstone Area Action Plan
Regulation 21(1)(c)(i-iv) Consultation Statement**

May 2012

LDF

Local Development Framework

1. Introduction

- 1.1 Consultation on the Harrow and Wealdstone Area Action Plan Issues and Options document took place between 13th May and 24th June 2011. Consultation on the Preferred Option document took place between 12th January and 23rd February 2012. Both rounds of consultation were undertaken in accordance with the Council's Statement of Community Involvement and in line with regulations that were in place at the time (Regulation 25 of the Town and Country Planning Local Development Regulations 2004, as amended). These regulations required the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken in the course of preparing the Area Action Plan, a summary of the main issues raised to consultation, and to detail how the Council's took account of the comments received in preparing subsequent versions of the plan, including the latest version - the Pre-Submission version of the Area Action Plan.
- 1.2 Since consultation on the Preferred Option was undertaken in January 2012, new regulations have been published. The Town and Country Planning (Local Planning)(England) Regulations 2012 came into effect on 6th April 2012. While the numbering of the regulations has changed, the requirement upon the Council to produce a Consultation Statement has not changed. This Consultation Statement therefore fulfils the requirements under the new Regulation 22(1)(c)(i-iv) to produce a statement of the plan's production (and represents the former Regulation (30)(1)(d) Consultation Statement).

2. Summary of consultation undertaken on the Area Action Plan Issues and Options consultation document

- 2.1 Upon commencement of the project to prepare an Area Action Plan (AAP) for the Harrow and Wealdstone Intensification Area, the Council established a cross-agency officer working group, comprising membership from the Council; the Greater London Authority; Transport for London; the Homes and Communities Agency; and representatives from the engagement forums (see below). The purpose of the working group was to provide specialist technical input into the preparation of the AAP. A Project Board was also established comprising director level representation from each of the authorities as well as the relevant Council Portfolio Holders. The purpose of the Board was to have oversight of the development of the AAP, including the monitoring of progress against deliverables, the adequate resourcing the project (both financial and staff time), and providing the political and agency sign-off required for key project milestones.
- 2.2 In addition to the Officer Working Group and Project Board, the Council also established a number of engagement forums as follows:

- The Landowners, Developers and Agents Forum – comprising membership of active local agents, key landowners within the Intensification Area, and developers with an interest in sites within the Intensification Area or active across the Borough;
- The Community Forum – comprising membership of local community groups, residents' associations, and amenity societies;
- The Local Business Forum – comprising membership of local businesses, Harrow in Business, and the town centre managers for Harrow and Wealdstone town centres;
- The Youth Forum – comprising membership from the Harrow Youth Parliament as well as those actively involved in the Harrow MyCity2 project.

2.3 The engagement forums were set up to help champion and develop the AAP. Each was chaired by an independently appointed representative, who was then also appointed onto the Officer Working Group. The initial meetings of the engagement forum groups were held in September 2010 and were used to raise awareness of the purpose of preparing the AAP, its broad objectives, the statutory process required to prepare a Development Plan Document, and the requirements for plan making in terms of soundness and a robust evidence base. Subsequent forum meetings, held in October – November 2010, were used as a sounding board to confirm the key issues, challenges and opportunities facing the area currently and/or over the coming years, and to test alternative broad spatial development options for the area.

2.4 On 7th April 2011, Harrow's Cabinet considered a report on the Harrow and Wealdstone Area Action Plan (see <http://www.harrow.gov.uk/www2/documents/s74493/Harrow%20and%20Wealdstone%20AAP.pdf>). At that meeting Cabinet recommended the AAP be referred to Full Council for approval.

2.5 On 14th April 2011, Full Council endorsed the Area Action Plan Issues and Options document and resolved to publish the document for consultation for a period of six weeks.

2.6 In addition to the above Council sign-off, the Deputy Mayor for London also formally signed off on the AAP Issues & Options document for public consultation on behalf of the Greater London Authority.

2.7 In summary, the Issues and Options document put forward four broad alternative spatial development options for consideration by the community. The four broad options, including a brief commentary of their respective strengths and weaknesses, were:

Option 1: One Centre – This option would see the three sub-areas (Harrow town centre, Wealdstone town centre and Station Road) being joined together by a shared intensification of activity, reducing any distinctions between the areas and, over time, see them developed as one large centre. This is a highly ambitious option that requires the maximization of the capacity of all strategic sites within the Intensification Area with development types (housing and employment) and densities being applied equally across the whole area. As a result, this option offers the highest overall outcomes in terms of levels of residential development and job outputs but this is likely to be at the cost of local context. This option may also not be compatible with existing levels of public transport accessibility and there is a risk that the market might not be able to absorb this level of development.

Option 2: Harrow + – In this option, intensification and development would be focused on Harrow town centre. It would ensure the centre's Metropolitan status was enhanced and retained, and would see significant public realm and infrastructure improvements delivered in the centre that would benefit the wider community. However, it would require most housing to be met in tall, flatted schemes, which presents risks in terms of market

saturation as well as opposition from residents to see this form of development within the town centre. The option would only result in modest growth and benefits for Station Road and Wealdstone, and therefore does not optimize the regeneration opportunities that exist within these sub-areas.

Option 3: Two Centres – This option would retain and reinforce the distinctiveness of Harrow town centre and Wealdstone, ensuring new development is sensitive to these areas. Growth would be focused within the two town centres, with flatted housing development in Harrow town centre (but at a much reduced scale than required under option 2) and the provision of family orientated housing in Wealdstone. The regeneration of Wealdstone will also benefit from housing and employment development of the Kodak site. Station Road does not play a significant role under this option, and therefore the opportunity to strengthen its role as a link between the two town centres and to regenerate Station Road will be missed.

Option 4: High Roads and Centres – This option is similar to option 3, but with the additional benefit of realizing the development opportunities that exist along Station Road, which would facilitate much needed public realm improvements along this corridor. However, this option would require appropriate controls and more detailed guidance to be put in place to ensure the three sub-areas retained their distinctiveness, in terms of function and built form, and did not morph into one homogenous entity as proposed by Option 1.

- 2.8 To secure the widest possible understanding of the modelled outputs, housing densities were presented in the consultation document as five typologies and equated to forms of existing residential development in the Borough from lower density traditional family housing to higher density modern blocks of flats. Similarly, the employment outputs were expressed as numbers of jobs in office, industrial, retail & leisure and other sectors. To convey how the modelled outputs might vary between the three component parts of the Intensification Area, the distribution of housing and job types was disaggregated in relation to Harrow town centre, Wealdstone and Station Road, with a further modest allowance for additional & infill sites.
- 2.9 Formal notification of the AAP Issues and Options Publication (old Regulation 25) was given on 13th May 2011, and representations were invited for a six week period ending 24th June 2011. Representations were also invited on the Sustainability Appraisal during this period.
- 2.10 A formal notice setting out the proposals matters and representations procedure was placed in the 'Harrow Observer' newspaper on both the 12th and 19th of May 2011 (see **Appendix A**). In addition, on 12th May 2011 a total of 1,045 letters (see **Appendix B**) were sent by post or email to all contacts on the LDF database (see **Appendix C**), including all appropriate general consultation bodies. Enclosed with the letter was the Statement of the Representations Procedure (see **Appendix D**), a questionnaire (see **Appendix E**) and explanatory notes on how to use Council's on-line consultation portal. Those emailed were also provided with the web link to the documents on the Council's consultation portal and LDF web pages. All specific consultation bodies (see **Appendix F**) were sent a letter by post (see **Appendix G**) on 12th May 2011. Enclosed with the letter was a hard copy of the AAP Issues and Options document, the Statement of the Representations Procedure, the questionnaire and response form, as well as a CD containing the Sustainability Appraisal Report, the Equalities Impact Assessment, an electronic copy of the AAP Issues and Options document, and the Baseline Report.
- 2.11 Hard copies of the AAP Issues and Options document, the Sustainability Appraisal Report, the Statement of the Representations Procedure and the questionnaire were made available at the Harrow Civic Centre (Access Harrow) and all libraries across the Borough. Additional copies of the AAP Issues and Options document were also made available at these locations for short term loan. The documents were also made available to

view and download from the LDF web pages of the Council's website and via the Council's consultation portal. The consultation portal has the added benefit of enabling respondents to submit their representations online as they review the document.

2.12 In addition to the above, and in an effort to inform and engage the wider public in the consideration of the AAP Issues and Options document, the following further engagement techniques were used:

- A quarter page colour advertisement was run in the Harrow Observer on the 12th and 19th May 2011 (see **Appendix H**);
- 5,000 colour leaflets were printed for distribution at consultation events (see **Appendix I**);
- A short version of the questionnaire was also prepared that simply summarised the four broad spatial development options and asked for feedback on these, including the respondent to indicate both a preferred and least option and encouraged them to provide their reasoning for their selection (see **Appendix J**);
- 12 drop in sessions were held during the six week consultation period, the major within the Intensification Area, but also across the Borough. These were advertised in the newspaper advertisements, the public notices, on the Council's website, and in the consultation letter. They offered the opportunity for residents and interested parties to come and learn about the AAP and to ask any questions of Council officers that they might have on the AAP as well as planning policy in general;
- We secured a stall at Harrow's Under One Sky event, which attracts over 10,000 local residents. In addition to all the usual consultation material, we also provided interactive material and prizes, such as an iPod, to entice people to the stall and to engage them in discussion about the Intensification Area and its future. This included an interactive map of the area that invited people to comment on the map itself about existing issues, opportunities, how they use the area and its assets, and what they enjoy or value most about the area;
- In total, over 500 face-to-face discussions were had with members of the public and interested parties at the drop in sessions and Under One Sky event;
- Officers also gave a presentation on the AAP Issues and Options document to the Major Developments Panel (a cross-party political committee of the Council); Greener Harrow (a representative body of all active amenity groups in the Borough); Harrow Town Centre Forum (a body that represents the interests of Harrow town centre including retailers, faith groups, residents and businesses); the Affordable Housing Delivery Group (a body representing all social landlords active within Harrow); and the Agents Forum (a body that represents over 70 planning agents active within Harrow); and
- Over 300 hours of Council officer time spent on direct community engagement activities during the six week consultation period.

2.13 A week prior to the close of consultation a reminder email and letter were sent out to those on the LDF consultation database to remind people of the closing date for making their comments.

3. Who responded and number of representations received

3.1 56 consultation responses were received to the AAP Issues and Options document. These came from various statutory authorities and local partners (8), developers and agents (16), interest groups (6), individuals (24), and 2 anonymous. **Appendix K** provides a full list of the respondents. In total, 295 individual comments were made that were considered and responded to by the Council (see **Appendix L**).

4. Summary of main comments / issues raised and Council's response to these

4.1 At the close of consultation on the AAP Issues and Options document, officers considered the representations and prepared a report for the meeting of the Council's LDF Panel on 26th July 2011. The report provided a summary of the main issues raised and Council officer's consideration and initial response to these. In addition to providing feedback on the consultation within a public forum, the main purpose of the report was to get political agreement on a way forward on these matters, enabling officers to take these into account in drafting the AAP Preferred Option consultation document. It should be noted that the responses set out below reflected the Council's published opinion to the matters raised at that time (i.e. July 2011) and have not been altered to take account of hindsight.

Building Heights

4.1 A number of respondents raised concern with tall buildings and the potential impact of tall buildings on heritage assets, in particular, Harrow on the Hill. The Council was well aware of resident's concern with tall or taller buildings, following a proposal for a tall building at 51 College Road, Harrow town centre, which Council refused and had its decision upheld at appeal. As set out in the LDF Panel Report officers considered that further evidence base work needed to be undertaken by the Council's consultants, including further detailed urban design analysis required to consider the appropriateness of tall buildings within the Intensification Area and potential locations. This work was to include consideration of the existing built form, identifying note worthy architecture, existing and potential views and vistas and to establish the design and tall policy framework required to manage any identified potential impacts or specific outcomes sought for the area or places within it. That work and the building heights policy would then be the subject of consultation on the Preferred Option in January 2012.

Strategic Industrial Location Designation

4.2 Several representations sought clarification of the Strategic Industrial Location designation applying to sites in Wealdstone. Post publication of the pre-submission version of the Core Strategy, Council officers clarified with the GLA that the regional designation applied only to the main Kodak site and Waverley Industrial Estate. All other employment sites in Wealdstone are therefore allocated locally as industrial and business use areas in the UDP. Officers reported at the time that the policy approach remains - that the consolidation of either the strategic or local designation applying to these sites would be considered in the context of preparing the Area Action Plan with the objective of securing the long-term employment use of these sites through redevelopment promoting employment-led development providing new industrial floorspace and employment diversification. The new Policies Map, to be produced at Pre-submission stage, would distinguish between the various employment designations (e.g. Strategic Industrial Location; Industrial & Business Use Area; and Business Use Area).

The Promotion of Sites for Consideration for Allocation within the AAP

4.3 Many of the representations from landowners or developers sought to promote their site for particular forms of development or sought to ensure that the Area Action Plan will not place barriers to the realisation of the perceived development potential of these sites. The Council welcome the fact that landowners and developers were engaging in the preparation of the Area Action Plan but did not consider it appropriate, at that stage in the Plan's preparation, to offer a view of the suitability or otherwise of uses, mix, form or quantum's to be provided by any of the sites offered up. The officers reasoning for this was that, as set out in the Core Strategy and the objectives of the Area Action Plan, the intention in preparing the

AAP is to consider all sites not in isolation but in terms of their contribution to the delivery of the vision and objectives for the Intensification Area as a whole. The Council therefore encouraged developers and landowners to continue to engage in the preparation of the Area Action Plan prior to making any determination as to the future potential uses of their sites. Site specific proposals were to form the basis of consultation on the Council's Preferred Option in January 2012.

Infrastructure Provision and Delivery

4.4 With regard to residents, interest groups and other interested parties, a key concern raised was in respect of infrastructure provision. Some, such as Campaign for a Better Harrow Environment queried the existing evidence base, especially in respect of transport provision, and also wanted a requirement that the infrastructure be delivered ahead of the development. Others were concerned with specific types of infrastructure including adequate provision of parking, healthcare facilities, schools and playspace. Officers responded that additional local evidence base work will be undertaken, where appropriate, by the consultant team to supplement the borough-wide analysis undertaken for the Core Strategy, in particular, in terms of transport requirements. However, it was not envisaged that this work would present information wholly different to that in the borough-wide studies, in terms of conclusions, but would provide additional detail about the specification of the infrastructure to be provided, timescales for delivery, preferred locations, costs and funding.

Intensification Area Designation and Housing Target

4.5 Many of the respondents queried why the area has been identified for intensification and were opposed to the provision of a further 2,500 homes, which they consider was too much for such a small area and would lead to mostly flatted development, overcrowding and increased pressure on existing social services. It was made clear in the draft document that the intention of the Area Action Plan was not to revisit such matters which have been the subject of much consultation and debate through various stages of preparing the Core Strategy. The rationale for the Intensification Area within the Core Strategy is clear: to ensure Harrow town centre maintains its Metropolitan centre status, to promote new retail; leisure and office renewal in Harrow town centre; to maximise the benefits of the existing excellent public transport network serving the area; provide a focus for investment in Harrow that will also secure much needed infrastructure improvements benefiting the whole Borough; to promote the much needed regeneration of Wealdstone; to secure the long-term employment use of the industrial areas around Wealdstone; and to meet Harrow's housing needs through the promotion of development led regeneration that also enables the Council to manage growth within the rest of the Borough in a more sustainable and sensitive way. Officer response to the concerns raised were to reiterate that the Council, and the regulations regarding plan-making, were clear that the Core Strategy is the appropriate policy vehicle through which decisions regarding the broad distribution of future development within Harrow should be addressed. The preparation of the Area Action Plan does not therefore offer the opportunity to query or reconsider the agreed spatial strategy for the Borough.

Strengths, Weaknesses, Opportunities and Threats

4.6 Numerous comments were made to the section covering the SWOT analysis of the area as a whole as well as the sub areas. The vast majority of comments were considered particularly useful. Many respondents offered up additional opportunities, sought clarification on the current validity of some of the suggested strengths, and highlighted a number of further weaknesses they considered to be present within parts of the Intensification

Area. Officer response was to amend and incorporate these in the Preferred Option document, specifically those made in respect of addressing local strengths and weaknesses.

Key Issues, Challenges and Drivers for Change

4.7 As with the SWOT analysis, many comments were received to section 4, which outlined the key issues, challenges and drivers for change. These came mostly from service providers or statutory bodies and therefore were necessarily focused on those issues core to these organisations. The comments included additions in respect of cultural facilities (Theatres Trust) and decentralised energy network provision (GLA), the need for affordable housing, problems for cyclists and bus users (Harrow Friends of the Earth), the conservation of heritage assets either individually or as groups (English Heritage), and local provision for sport and physical activity in the area (Sport England). In addition, many of the responses reiterated their concerns with the provision or appropriateness of tall buildings in the Intensification Area and concerns regarding traffic and the need for appropriate mitigation measures to manage both existing and future requirements. On the latter, six representations offer up the suggestion that the High Street in Wealdstone and Ellen Webb Drive should be reconnected to help ease congestion and reduce impact on the surrounding road network. Officers responded that it was clear from the responses that the issue and challenges highlighted by the Council are those shared by the respondents and to which attention through further work to inform the AAP preferred Option must be given. In this respect, it was recommended that more detailed evidence or studies would need to be undertaken on specific issues such as views, traffic, tall buildings and social infrastructure requirements.

Map 5.1 – Strategic Opportunity Sites

4.8 25 representations were made to the Council's identified and proposed strategic sites on map 5.1. Comments from local residents and interest groups included requests that the nature of industrial redevelopment of the sites in Wealdstone be controlled to minimise the impact on the neighbouring residential areas and the need for 'blue sky' global thinking on the future development of the Kodak site for new employment provision. Disappointingly, none of the representations from the community groups or local residents put forward their views as to what might be considered acceptable development on any of the sites identified as potential proposals sites. However, a number did offer up further additional development opportunities that the Area Action Plan should consider, including: the Safari Cinema; Station Road East Side from the Gayton Road junction along to Lyon Road; sites in St Johns Road; Kings House up to the Corner of Junction Road moving West; and the site on the corner of Harrow View and Balfour Road (currently derelict home and garden).

4.9. With regard to comments by agents, landowners and developers, these sought either to promote sites already identified for specific forms of development or to promote new sites for further consideration, including Barratt Way Industrial Estate, 315-335 Station Road (i.e. the O'Neill's Pub to Nat West Bank), Wealdstone Police Station and Wickes House at 120-128 Station Road. One agent also suggested the AAP should identify, in addition to strategic sites, the age of the building stock in the area to highlight those at the end of their useful life that that should come forward for renewal.

4.10 Officers responded that all potential sites for allocation in the AAP would need to be considered in more detail, having regard to the delivery of the selected preferred spatial development option and how the sites already identified, as well as those offered up by the community or landowners for Council's consideration, might contribute towards the delivery of the overall vision and strategic objectives for the Intensification Area.

However, while it was not considered appropriate at that stage to provide further detailed comments as to the future potential uses of these sites, officers did note their concerns that the AAP did not seek to allocate too many sites for redevelopment, as it was felt that this might undermine developer confidence in the area and send the wrong message. The sites to be allocated needed to represent strategic sites, crucial to delivery of the AAP objectives and delivery of the spatial strategy. However, officers did clarify that they anticipated and expected non-allocated sites to still come forward for redevelopment within the Intensification Area, and that the AAP would need to include general policies against which to consider the appropriateness of such proposals. Therefore the fact that a site was not considered for allocation within the AAP would not necessarily prevent it from coming forward for appropriate redevelopment. The proposed AAP site allocations would form the basis of consultation on the Council's Preferred Option in January 2011.

4.11 Table 4.1 (overleaf) sets out a summary of responses received to the four strategic development options put forward for consultation.

4.12 On the basis of the responses received, Option 4 received the most support as the option on which to develop the AAP Preferred Option proposals. Option 3 was a close second preference for most respondents. Option 1 did receive some support, especially from developers due to the fact that it sought to maximise the potential of all sites. Option 2 received the least support – in fact the only respondent supporting this option was the Environment Agency due to the fact that it directed development away from areas in Wealdstone which are subject to flooding risk. In terms of the raw numbers and the range of consultees Option 1 received support from five respondents, 4 of which were developers and the Hatch End Association; Option 2 only the representation of the Environment Agency in support but numerous provided in opposition; Option 3 received 6 representations in support, with three further consultees ranking this equal with Option 4. In respect of the types of consultees supporting option 3, these included a mix of developers, local residents and local interest groups but none of the statutory providers. Option 4 received the most support with 15 selecting this as their preferred approach and a further 3 supporting both this option and option 3. Again there was a good mix of the types of consultees supporting this option including statutory bodies, developers, local agents, local residents and a number of local interest groups.

4.13 Based on the analysis of the comments received, the LDF Panel, at its meeting of 26 July 2011, endorsed the officer recommendation that the preparation of the Council's preferred option for the AAP be based upon the support received to strategic spatial development Option 4 but having regard also to the comments and considerable support received to Option 3.

Table 4.1: Summary of the Comments made to the Four Broad Spatial Development Options

Option	Support	Not support
Option 1 – One centre	<ul style="list-style-type: none"> ▪ Offers most balanced approach to growth which is spread across both centres ▪ Makes the most efficient use of both transport hubs ▪ Proposes high levels of balanced residential development - this sector is likely to recover more quickly and more fully than commerce and industry ▪ Most likely to provide the initial momentum and confidence to "kick start" the wider economic recovery of the Borough ▪ Providing buildings are not too high to be detrimental to the view of Harrow-on the Hill and that the Headstone Manor area is enhanced along with other surrounding green spaces and some of Wealdstone's Victorian characteristics maintained/ matched ▪ Harrow and Wealdstone have always been linked (also because of the railway lines) and a good balance is achieved either side of the Civic Centre, between the two 	<ul style="list-style-type: none"> ▪ Wealdstone and Harrow Town Centre are two distinct communities with different priorities and problems and must be treated separately ▪ Would reduce quality of life with too much housing in such a small area. ▪ Rob the distinctiveness of the town centre and Wealdstone, potentially watering down the different offers of both ▪ Potentially destroy the 'High Street' businesses along Station Rd. ▪ Presents significant challenges in terms of retaining the differential character of the various regions within the intensification area identified in Chapter 3, and the baseline report ▪ Option 1 tries to cram far too much into the area for there to be any hope of providing an attractive sustainable environment. It would be a recipe for traffic congestion pollution and environmental degradation ▪ Represents an approach that is too uniform for such a large area; and would query whether it would be possible, and critically whether it would be the right thing to do, to seek one homogeneous character for the Intensification Area ▪ Is heavily reliant on significant investment in to the Borough, and there is concern this may be overly ambitious

- Option 2 – Harrow Plus 2 and 3
- Directs more vulnerable uses to locate outside flood zones
 - Would lead to further deterioration of Wealdstone, which in turn could impact on viability of the Kodak site.
 - Unrealistic expectations for employment growth and will result in a surplus of under utilised sites and premises
 - New growth should be directed to both Harrow and Wealdstone centres
 - Ignores the potential of Wealdstone especially benefit of Wealdstone's transport links as outlined in section 3.21
 - The opportunities arising from the significant potential development sites in Wealdstone would not be realized
 - Harrow Town Centre would become over-burdened to accommodate the projected jobs and homes.
 - Wealdstone & Station Road would become even more deprived and this is not acceptable
 - Option is likely to sterilise the land to the north Harrow Town Centre to the detriment of the local economy and local environment
- Option 3 – Two Centres
- Support but note need to consider that interventions to improve traffic flow on Station Road does not have an adverse impact on businesses
 - Wealdstone and Harrow Town are two distinct communities with differing priorities as therefore must be treated as such
 - Believe individual development sympathetic to each location is preferable to the other options
 - Station Road should not be overdeveloped
 - Would result in "lop-sided" growth which would be to the benefit of Harrow and detriment of Wealdstone
 - Would result in Wealdstone continuing to be the focus of industrial/commercial development which would result in the Harrow being redeveloped at a greater pace
 - Opportunity for wider redevelopment along this Station Road would be missed

Option 4 – High Roads and Centres

- Achieves more benefits than the other three Options
 - Would provide the best mechanism for delivering the overarching objectives of the Intensification Area, and achieving the objectives clearly set out in the AAP and indeed within Policy CS2 of the emerging Core Strategy
 - Delivers the London Plan objectives for the two town centres, as well as stimulating the renewal of Station Road
 - Station Road must also give the "right impression" coherent with re-development of the 2 centres
 - Allows both centres to develop their own identity and character whilst regenerating the station road corridor making journeys between the two centres an attractive proposition and experience.
 - There is no point developing Harrow centre and leaving Wealdstone and Station Road as they are
 - Gives the highest amount of family housing and the best prospect of improving the environment of Station Rd for pedestrians and cyclists. It will, however, only avoid problems of increased traffic congestion and pollution if new flats in Station Road are planned as a car-free development
 - Welcome the outcomes for Harrow Town Centre that would be delivered via this option, whilst ensuring a balanced approach throughout the Intensification Area
 - Would best support delivery at key sites and could potentially generate the greatest outputs
 - Would achieve the investment and development that would be achieved in Option 3, but with the additional benefit of focusing this principally on the areas with specific need
 - Most appropriate and sustainable option, ensuring the acknowledged 'opportunity' that the important Station Road corridor offers is not missed
- Would result in Wealdstone continuing to be the focus of industrial/commercial development which would result in the Harrow being redeveloped at a greater pace
 - Require significant intervention (e.g through CPOs etc) and investment in Station Road to be achieved, diverting money, time and resources away from the key centres of Harrow Town Centre and Wealdstone
 - Further expansion of Station Road will lead to a one centre if unchecked.
 - Station Road has serious congestion issues and strengthening the links between Wealdstone and Harrow along this corridor only will only worsen this

4.14 As mentioned in paragraph 2.10 above, in addition to the written representations to the AAP document, community views on the AAP were also sought at Harrow's Under One Sky Event. The outcomes from that community involvement are summarised in **Appendix L** and include Council's response to the matters raised. These alongside the formal representations were taken into consideration by officers in the preparation of the AAP preferred option.

5. Continuous Engagement and the Development of the AAP Preferred Option

- 5.1 Having analysed the comments received to the AAP Issues and Options consultation, and reported this to the Council's LDF Panel to seek political endorsement for a way forward for development of a Preferred Option, the Council's consultations undertook development capacity and viability testing of identified opportunity sites, alongside urban design analysis associated with sub area outcomes around regeneration, renewal and intensification.
- 5.2 The consultants and Council officers then discussed initial site proposals, supporting policies and design considerations with the engagement forums and with the individual landowners and developers. For developers seeking to bring forward planning applications in advance of the AAP, the Council sought to ensure, through pre-application discussions, that emerging proposals were having regard to the emerging Preferred Option, and where appropriate, there was a sharing of information and studies to inform such discussions.
- 5.3 In addition to the above, throughout the preparation of the AAP Preferred Option, officers took update reports to the Council's Major Developments Panel (a cross-party committee of the Council). The Major Developments Panel offers a public forum and platform for open discussion and debate, ensuring political buy-in was achieved to specific proposals and policy directions within a.

6. Summary of consultation undertaken on the Area Action Plan Preferred Option

- 6.1 Following the endorsement of Council's Overview & Scrutiny Committee, the Major Developments Panel, LDF Panel on 22nd September, 1st & 8th of December respectively, Cabinet considered a report on the AAP Preferred Option on 15th December 2011 (see <http://www.harrow.gov.uk/www2/mgChooseDocPack.aspx?ID=60643>). At that meeting Cabinet approved the AAP Preferred Option document for publication for public consultation.
- 6.2 In addition to the above Council sign-off, the Deputy Major for London also formally signed off on the AAP Preferred Option document on 19th December 2011 for public consultation on behalf of the Greater London Authority.
- 6.3 Formal notification of the AAP Preferred Option Publication (old Regulation 25) was given on 12th January 2012, and representations were invited for a six week period ending 23rd February 2012. Representations were also invited on the Sustainability Appraisal and on the Harrow View Assessment during this period.

- 6.4 A formal notice setting out the proposals matters and representations procedure was placed in the 'Harrow Observer' newspaper on 12th January 2012 (see **Appendix N**). The public notice included the details of 10 drop in sessions being held within the Intensification Area over the consultation period, which offered the opportunity for members of the public to view copies of the document and to ask questions about the AAP of Council officers.
- 6.5 On the 11th January 2012 a total of 1,045 letters (see **Appendix O**) were sent by post or email to all contacts on the LDF database (see **Appendix C**), including all appropriate general consultation bodies. Enclosed with the letter was the Statement of the Representations Procedure (see **Appendix P**) and an AAP flyer (see **Appendix Q**). Those emailed were also provided with the web link to the documents on the Council's consultation portal and LDF web pages. All specific consultation bodies (see **Appendix F**) were sent a letter by post (see **Appendix R**) on 11th January 2012. Enclosed with the letter was a hard copy of the AAP Preferred Option document, the Statement of the Representations Procedure, as well as a CD containing the Sustainability Appraisal Report, the Equalities Impact Assessment, an electronic copy of the AAP Preferred Option document.
- 6.6 Hard copies of the AAP Preferred Option document, the Sustainability Appraisal Report, the Statement of the Representations Procedure and AAP flyers were made available at the Harrow Civic Centre (Access Harrow) and all libraries across the Borough. Additional copies of the AAP Preferred Option document were also made available at these locations for short term loan. The documents were also made available to view and download from the LDF web pages of the Council's website and via the Council's consultation portal.
- 6.7 In addition to the above, and in an effort to inform and engage the wider public in the consideration of the AAP Preferred Option document, the following further engagement techniques were used:
- A full central pull out page colour advertisement was run in the Harrow Observer on the 26th January 2012 (see **Appendix S**);
 - 5,000 colour booklets were printed for distribution at consultation events (see **Appendix T**);
 - As stated above 10 drop in sessions were held during the six week consultation period, the major within the Intensification Area, but also across the Borough. These were advertised in the newspaper advertisements, the public notices, on the Council's website, and in the consultation letter. They offered the opportunity for residents and interested parties to come and learn about the AAP and to ask any questions of Council officers that they might have on the AAP as well as planning policy in general;
 - The Council also set up a blog on its website that enables residents to comment on the AAP and for others to read these and respond with their own comments;
 - In total, over 400 face-to-face discussions were had with members of the public and interested parties at the drop in sessions;
 - Officers also gave a presentation on the AAP Preferred Option document to the Major Developments Panel (a cross-party political committee of the Council); Greener Harrow (a representative body of all active amenity groups in the Borough); Harrow Town Centre Forum (a body that represents the interests of Harrow town centre including retailers, faith groups, residents and businesses); the Affordable Housing Delivery Group (a body representing all social landlords active within Harrow); and the Agents Forum (a body that represents over 70 planning agents active within Harrow); and
 - Over 200 hours of Council officer time spent on direct community engagement activities during the six week consultation period.

6.8 A week prior to the close of consultation a reminder email and letter were sent out to those on the LDF consultation database to remind people of the closing date for making their comments.

7. Who responded and number of responses received

7.1 In total, we received around 500 specific comments from 58 respondents to the AAP Preferred Option consultation. The list of respondents is provided at **Appendix U**. While the detailed comments received, and the Council's response to each, is provided in the tables of **Appendix V**.

8. Summary of the main issues / comments raised to the AAP Preferred Option consultation and the Council's response to these

8.1 The following section of the report summarises the main issues raised through consultation on the AAP Preferred Option and outlines the Council's proposed response to these and the changes made to the document. The report does not include reference to policies and allocations where the comments were all in support; offered only minor change; or no comments were received.

Policy AAP 1: Development within Harrow town centre

8.2 There was general support for the policy, especially the requirements for high quality design. Most of the comments received sought to expand on the existing policy to provide greater clarity and ensure the objectives for the Heart of Harrow and the sub area were adequately reflected. Changes have therefore been made to reflect these where they seek to strengthen the policy. In other instances, in preference to amending the AAP policy, reference has been made to other relevant policies in the AAP or in the Development Management DPD rather than repeating these again here.

Policy AAP 2: Station Road

8.3 Most comments sought clarity on the definition of terms used. Changes have therefore been made to provide this. Support is given to the restoration of Safari Cinema and for improving the environs of Station Road. A further policy has been added that advocates the planting of street trees, the segregation of new cycle provision and the establishment of a central reserve, to promote the boulevard character to which Policy AAP2 refers.

Policy AAP 3: Wealdstone

8.4 All comments received were in support of the regeneration of Wealdstone through the policy. The only change proposed is to the reference to the 'masterplans' in chapter 6, where it was agreed that the reference should be proposals being in general conformity with the 'site allocation' and 'development principles' set out in chapter 6. This change applies throughout the AAP.

Policy AAP 4: Achieving a high standard of development throughout the Intensification Area

8.5 All of the comments were again supportive of the policy. The purpose of the policy is to provide development standards applicable across the whole of the Heart of Harrow, whilst leaving policies AAP1 – 3 to add further detail specific to the broad sub areas. Given the purpose of the Policy, it was felt that it should really come before the sub area policies, so there is a change in sequencing.

Policy AAP 5: Density and use of development

8.6 There was opposition from some residents to Policy AAP5 D, which sought to enable consideration of densities in excess of the London Plan density guidelines where development proposals also exceeded the London Plan, Core Strategy and AAP design and environmental standards and made an appropriate contribution to on and off-site infrastructure provision. To overcome these concerns a change has therefore been made to the policy to clearly state that proposals that represent 'over development' of a site will be resisted.

Policy AAP 6: Development height

8.7 There was strong opposition to the policy but for different reasons. Some object to the need for tall buildings within the intensification area due to their potential for impact upon the skyline and the Hill. Other wish the guidance to be more detailed, while the agents for the Dandara site object to much of the policy criteria and design parameters, which they consider goes against the Secretary of State's findings from their appeal. The latter also objects to the requirement to provide public rooftop access on tall buildings as being inconsistent with the London Plan.

8.8 In light of the comments, significant amendments have been made to the Policy to clarify the strategic approach to tall or taller buildings; the potential impacts to be addressed; their role, function and location; the criteria against which proposals are to be assessed; and the integration with the protection of local views. Other minor amendments are made to overcome the issues of inconsistency identified. Further material is also provided to help illustrate what is intended through application of the Policy.

Policy AAP 8: Enhancing the setting of Harrow Hill

8.9 This policy is informed by the Harrow Views Assessment (2012) and is denounced as flawed by the agents for Dandara and broadly supported by everyone else including the GLA. In response to the comments, the AAP has been amended to incorporate assessment criteria drawn from the detailed visual management guidance within the Harrow Views Assessment (2012). Other changes are made to better clarify the relationship between associated policies within the Development Management DPD, and the need for development proposals that would be subject to protected views to submit a views assessment.

Policy AAP 9: Flood risk and sustainable drainage within the Intensification Area

8.10 The comments received sought to make the policy more robust, including dealing with surface water flood risk and avoiding increasing the impermeability of the AAP area. These will help strengthen the policy and have therefore been made in the AAP.

Site 2 – Kodak and Zoom Leisure

8.11 At the time of consultation on the AAP Preferred Option, consultation was also being undertaken on the Land Securities planning application for the site. A number of representations drew on differences between the two, including:

- the location of the school, which most agreed would be best located on the Zoom Leisure portion of the site;
- the supermarket, which received general support; and
- the footbridge over the main railway line, which most thought was important and should be required of the planning application.

8.12 Of the two masterplans, the one submitted with the planning application was noted as being preferred. There was support for the delivery of family housing, new employment space and community facilities, and especially for the concept of a green corridor running through the site to Headstone Manor. A number of representations noted concerns over the loss of open space on Zoom Leisure in terms of its impact on Headstone Manor's setting but not in respect of the loss of the playing pitches.

8.13 However, a common theme of the representations is the concerns over traffic impact on local roads and, in particular, the Harrow View / Headstone Drive junction, with most believing that the recent construction of Good Will to All site has compromised a comprehensive redevelopment of the junction being advanced.

8.14 Given the comments received, the stage the planning application has reached, and the comprehensive nature of the evidence produced in support of the planning application, the AAP has been changed to more closely reflect the Land Securities proposal in terms of uses, quantum and layout. As the Land Securities proposal is an outline application, much will be left to reserve matters. In consultation with Design for London, further changes have therefore been made in the AAP to clearly articulate the detailed design considerations that will need to be considered through subsequent applications for the reserve matters.

8.15 With respect to traffic impacts, these have been modelled by Transport for London (TfL). The Council, TfL and Land Securities are now considering the mitigation measures to be put in place to address the identified impacts.

Site 3 – Teachers Centre

8.16 The AAP proposal met with strong opposition from Governors of the Whitefriars Community School. In particular, they felt the wording made it unclear as to the future of their school on the site and were concerned with the loss of their playing fields, and the hall and gymnasium which they share with the Teachers Centre. Changes have therefore been made to the text to assure the community that the school is to be retained on the site and that the proposal for a new secondary school on the remainder of site would include the re-provision of the hall and gym, if these are not to be retained, and would require shared use of such facilities between the schools. The text has also been amended to clarify that, in accordance with the Core Strategy, there is to be no net reduction in the amount of open space provision on the site but that its reconfiguration is likely to be required to provide for the new school, and to ensure an element of wider public use of the open space is maintained.

8.17 The other main concern raised by a number of respondents was the impact on traffic, with many citing that the Teachers Centre is some distance from public transport and that the local roads were already congested as a result of the existing schools in close proximity to the site, including the Whitefriars Community School, Salvatorian College and the Sacred Heart Language College.

8.18 Given that the site has a long history of education use, the site remains the Council's preferred option for a new secondary school. Further changes have been made to extend the boundary of site to take in the builder's yard on Cecil Road, the Whitefriars Industrial Estate and Aerospace House. The designation will provide for continued industrial use of these sites as well as for further education use, enabling the consideration of a much larger parcel of land to provide further options to accommodate a new school more comfortably on the site. It will also enable wider options to be considered to mitigate the traffic impacts arising from any school proposal. While TfL have modelled these impacts, the mitigation will need to respond to the final school proposal for the site, and being a free school, this remains unknown at this time. Further consultation with the community will therefore need to take place prior to application coming forward for a new school on the site. The Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. Amendments are made to the AAP to reflect these requirements.

Site 4 – Colart

8.19 A number of representations oppose the proposals for housing on the site and wish to see it retained for employment. The Salvatorian College also expressed a desire to expand onto part of the site.

8.20 The Employment Land Review highlights the lack of demand for industrial uses in the borough, especially large industrial units. The key consideration for this site is in securing new jobs equivalent in number to that achieved when Colart were in operation. This is to be achieved through retention of the Winsor and Newton building but will likely require additional employment provision to be made elsewhere on the site, potentially the area fronting the High Street which is subject to flooding. This part of the site could also provide for community use as an alternative to employment provision should the retention and conversion of the existing unit(s) prove to be a more viable option. As with Kodak and other identified industrial sites, enabling residential development will be required to deliver new employment space and community use, and therefore the allocation of the site for employment-led mixed use development has not changed.

8.21 Following further discussion with the College, the Council has requested they submit further evidence to support their proposal for expansion. While this is yet to be received, the AAP has been amended to accommodate this possibility but specifies that this is subject to the College providing the robust evidence required, including their ability to purchase the land. In making provision for the College's expansion, it is appropriate to include both the petrol station and adjoining workshop unit within that building envelope.

Site 5 – Wealdstone multi-storey car park

8.22 The representations to the proposal for this site were limited but mixed. One saw the need for a supermarket as being crucial to support the town centre, two were concerned with the potential loss of the parking and the impact of this on the vitality of the town centre, while Land Securities questioned the deliverability and suitability of the site for a supermarket.

8.23 Base on the comments received, and the fact that the Kodak site will now make provision for a large supermarket, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP.

However this would not restrict proposals from coming forwards but would require it to be considered on its merits against the policies of the AAP and the delivery of the sub area objectives.

Station Road Sub Area

8.24 Many comments were received on the current state of Station Road, in terms of its low environmental quality, traffic congestion and the difficulties experienced by cyclists and pedestrians. The majority of the representations were therefore supportive of the AAP proposals. However, a number of them raised concern with the expansion of Tesco's as potentially undermining the sub-area objective to continue to maintain and support the small independent shops and businesses present along much of Station Road. A number also wish to know what the future plans are for the Magistrates Court, and query why it is not included as a site in the AAP.

8.25 The application to extend the existing Tesco store has already been approved, although yet to be constructed. Evidence was submitted with the application, and independently verified, that showed there would be limited impact on the existing retail within both Harrow town centre and Station Road.

8.26 With regard to the Magistrates Court, the Council understands this was recently sold by the Department for Justice to a charity organisation, but as yet their intentions for the site remain unknown. It is therefore not appropriate to include the site in the AAP and provide speculation as to its future use, noting that, if the site was to come forward for development, the policies of the AAP and the objectives for this sub-area provide sufficient basis upon which to determine the merits of the proposal.

Site 10 – Civic Centre

8.27 The number of representations made to this site allocation is limited but they note the amount of land currently given over to parking on the site and are therefore generally supportive of development. Issues raised are with the proposed building heights on parts of the site (i.e. those fronting Station Road and Railway Approach); whether it is necessary to demolish the existing Civic Centre; where a new Civic Centre is to be located; and the need for the pedestrian access through to Wealdstone Station to be prominent and large.

8.28 To respond to the above issues a number of changes are proposed to the allocation and its text. These include the realignment of the pedestrian route to provide a more straight line of sight through to the Station from the new civic space; a widening of the pedestrian access and green space; the requirement for an active frontage along the new pedestrian route; a reduction in buildings heights on parts of the site; and a requirement that non-active frontages on Station Road be stepped back.

Harrow Western Gateway Sub Area

8.29 The representations note that this sub area is dominated by several large developments which were approved and commenced before the AAP was drafted. They note little can be done in respect of these developments. However there is a clear desire, and one that is shared by the Council, to see the Bradstowe House development completed.

- 8.30 The primary concern raised to the sub area is the inclusion of the northern side of Pinner Road within the AAP boundary, which a number of respondents say should not be subject to intensive development given the residential nature of the area and the fact it borders the recreation ground.
- 8.31 The reason why the AAP boundary extended to the northern side of Pinner Road was not to facilitate development in this location but rather to take account of the junction and the connection between the sub-area and use and access to Harrow Recreation Ground. This is also the reason why the boundary of the Wealdstone West sub area extends to include Headstone Manor, in ensuring development of Zoom Leisure had regard to the setting of this heritage asset. Likewise, within the Wealdstone East sub area, the boundary included Bryon Recreation Ground to ensure development on the Driving Centre respected the open space. However, in light of the comments received, the boundary has been amended as cross boundary matters are adequately dealt with by appropriate amendments to AAP Policy 5.

Harrow Town Centre Sub Area

- 8.32 There is strong support for the improvements of Harrow bus and tube stations, the creation of the link through Havelock Place, and for the enhancements to Lowlands Recreation Ground. Greater clarity is wanted about the provision of the new central library and Civic Centre, and there is general disappointment that the AAP does not make provision for a theatre in the town centre. Concerns over buildings heights are also raised.
- 8.33 Amendments have therefore been made to the site allocations to state Council's preference for the location of a new central library and for the new Civic Centre. The latter also includes the consideration of flexible democratic space to be shared and used as possible theatre space. The issue of buildings heights is addressed earlier in this report in respect of changes to AAP Policy 6.

Site 19 – 51 College Road

- 8.34 The vast majority of representations received to this site allocation were from the agents representing the site. In particular, they do not want the site plan to be so specific as to show a potential site layout; have requested that the figures for housing and jobs to be expressed as targets and not a minima; have requested the design consideration state a building up to 19 storeys in height; query the prescriptive illustration of the proposed view to be created; seek the range of appropriate town centre uses to be included in either the leading or supporting uses described for the site; query viability and policy compliance in meeting some of the objectives for the site; and seek changes to the terminology used.
- 8.35 In response to the representations, changes have been made to the AAP where these sensibly add clarity. Changes have also been made to enable flexibility in the consideration of the design and layout of the final scheme to address the objectives for the site and sub-area, which have not changed.

Site 23 – Lyon Road

- 8.36 The comments received in respect of the Lyon Road development were concerned with building heights and, in particular, the impact upon neighbouring developments and the potential to undermine the sub area objective to create a transition between the town centre and the residential area just beyond the town centre boundary.

8.37 The above concerns were considered in the context of the recent granting of the planning application for the Lyon Road site. The changes to the site in the AAP are therefore made to reflect the now permitted development.

New sites proposed

8.38 Proposals were put forward by four landowners for the inclusion of their sites in the AAP allocations. These were:

- Plantation Garden Centre, Kenton Rd / Peterborough Rd, for retail and residential use;
- Wealdstone Police Station, Wealdstone town centre, for a residential-led development providing retail units within the central courtyard
- Areospace House, Cecil Road, for residential-led mixed use development to enable relocation and expansion of the existing business to another more suitable site within the borough.
- Wickes House, Station Road, which the land owner states is to be vacated by the current tenants in September 2013, and is therefore being proposed for active ground floor uses fronting Station Road and hotel or residential use above and across the remainder of the site;

8.39 The Plantation Garden site is outside of the current AAP boundary area. Nevertheless, the land is designated Metropolitan Open Land, and therefore its allocation for more intensive development would be at odds with the Core Strategy.

8.40 With respect to the Wealdstone Police Station, the agents acting on behalf of the Metropolitan Police were to provide an updated estates strategy or other evidence as appropriate, to demonstrate how provision to serve the area is proposed to be met. To date such evidence has not been provided, and without it, the allocation of the site for change of use would be at odds with the Core Strategy (Policy CS1Z)

8.41 As already outlined above, the Areospace House site is to be included in the extended boundary of the Teachers Centre site and allocated for continued industrial use as well as education / training / community and economic (non-town centre) uses.

8.42 While the agents for Wickes House submitted statements to support their proposals for a change in use, the Council notes that the site is currently occupied (at least for another year); that no marketing of the site has taken place upon which to gauge levels of interest; the building is of good quality in comparison to most stock within the AAP area; and that the proposals put forward (with the exception of the hotel development) would be inconsistent with the objective of the AAP to renew the office market. In light of these matters, and without further robust evidence, it is not considered appropriate to include the site as an allocation within the AAP at this time. If the site was to come forward for development, the policies of the AAP and the objectives for this sub-area provide sufficient basis upon which to determine the merits of the proposal.

Appendix A – Public Notice of the AAP Issues and Options consultation – run on 12th & 19th May 2011

Company may be obtained from S Cohen (Licensed Insolvency Practitioner) at Messrs Pimlico Cohen Recoveries LLP, Great Central House Great Central Avenue South Ruislip Middlesex HA4 6TS (email: pervin@rodsham@pimlicohen.co.uk) Dated 05/05/2011 DONALD BENNETT Director T319157

advertisements given at the top of this notice. A Guide to Making Representations is available from the Traffic Commissioner's Office.

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Public Notice

**Harrow Council
Local Development Framework
Consultation**

Public consultation pursuant to Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended by Regulation 2 of the Town and Country Planning (Local Development) (England) Regulations 2008.

Harrow and Wealdstone Area Action Plan: Issues and Options Consultation

Draft Development Management Policies (DPD)

Draft Site Allocations (DPA)

The above three Development Plan Documents have been prepared as part of Harrow's Local Development Framework. The Harrow and Wealdstone Area Action Plan issues and options document has been prepared jointly with the Greater London Authority (GLA). It identifies four, alternative options for the masterplanning of the Harrow and Wealdstone Intensification Area.

The draft Development Management Policies DPD sets out the policies that will be used to assess and determine planning applications for development outside of the Harrow & Wealdstone Intensification Area. Once adopted, the policies will supersede those contained in the Harrow Unitary Development Plan (2004).

The draft Site Allocations DPA allocates 'proposal sites' for development where opportunities have been identified, and identifies new or revised designations to which planning policies will apply (including open space, shopping frontages and new neighbourhood parades), outside of the Harrow & Wealdstone Intensification Area. Once adopted, the proposal sites and designations will appear on the Harrow proposals map, replacing that which accompanies the Harrow Unitary Development Plan (2004).

Notice is hereby given that public consultation on the above mentioned development plan documents will run from Friday May 13th to Friday June 24th 2011.

The document can be viewed online and representations can be made directly via the following website: <http://harrow-consult.limehouse.co.uk>. Alternatively written representations may be sent to the following postal and e-mail addresses:

Planning Policy Team,
Room 301,
Harrow Council,
Civic Centre,
Station Road,
Harrow HA1 2XF
Tel: 020 8736 6084
Email: ldfconsultation@harrow.gov.uk

The draft documents also available for inspection and short term loan at all Borough libraries, and at the Duty Planner Desk in Civic Centre 1.

Public consultation events will also be held throughout the Borough. Please check www.harrow.gov.uk/ldf for venues and dates.

Representations must be received by 5pm on Friday 24th June.

Andrew Trehern
Corporate Director, Place Shaping
On Behalf of the London Borough of Harrow

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Appendix B – Letter of Notification sent to consultees on the LDF database



Addresssee here

Place Shaping
Andrew Trehern
Corporate Director

09 May 2011

Dear

Harrow Local Development Framework (LDF) – Public Consultation 13 May – 24 June 2011.

Harrow and Wealdstone Area Action Plan DPD: Issues and Options
Draft Development Management DPD
Draft Site Allocations DPD

I am writing to invite you to take part on the first stage of public consultation on three new Development Plan Documents which will form an important part of Harrow's emerging Local Development Framework.

Harrow and Wealdstone Area Action Plan

This document is being prepared jointly with Greater London Authority (GLA). It sets out four different options to manage growth and development in the Harrow and Wealdstone Intensification Area, to ensure the document delivers the social, environmental and economic outcomes sought for the area – notably the delivery of 2,500 new homes and 3000 new jobs. This Area Action Plan will ultimately guide development in the area and will be used in dealing with planning applications. We are seeking your views on these four options, to see which strategy we take forward and develop into a preferred option.

Development Management Policies

The Development Management DPD sets out our initial approach to managing development outside of the Intensification Area through establishing the specific standards and policy criteria that new development will be expected to meet, and against which planning applications will be considered. This DPD has been developed to give effect to the Spatial Strategy set out in Harrow's Core Strategy. We are seeking your views on whether you agree with our detailed policies for managing growth.

Site Allocations DPD

The Site Allocations DPD allocates sites and identifies other planning designations outside of the Harrow and Wealdstone Intensification Area. The draft document identifies the locations

Harrow Council, Planning Department, P.O. Box 37, Civic Centre, Station Road, Harrow, HA1 2UY
tel 020 8736 6069 email info@harrow.gov.uk web www.harrow.gov.uk

and sites for specific types of development, such as housing and employment, and sites to be protected through planning policies, including retail frontages and open spaces, in order to ensure the vision, objectives and spatial development strategy of the Core Strategy are given effect and implemented. We are seeking your views on these designations, and whether you agree with our proposed use for certain sites, or are there are alternatives that have not been included?

How to get involved

We would like to know what you think about these draft documents. This first period of consultation on the three new DPDs will last for 6 weeks. We will take into account any comments made when revising these documents for a further round of public consultation later this year.

You can view these documents and comment online at <http://harrow-consult.limehouse.co.uk/portal>. You may also send your response by email to ldfconsultation@harrow.gov.uk or reply by post to:

Planning Policy Team, Room 301, Harrow Council, Civic Centre, Station Road, Harrow HA1 2XF

Alternatively, you can view and borrow the document from all of the Borough's libraries, and from Civic Centre 1. We will also be holding drop in sessions where you can view the draft documents and discuss their content with members of the LDF team. Please view local press and the Council LDF pages for details.

For further information, please see the Council's website at www.harrow.gov.uk/ldf or email ldfconsultation@harrow.gov.uk.

Following this initial consultation, the Council will consider the comments received and revise the documents where appropriate before publishing them for further consultation later in 2011.

Yours faithfully,

Andrew Trehern
Corporate Director of Place Shaping
Harrow Council

Appendix C – List of Contacts on the Council’s LDF Database

Moderation	Dron & Wright Property Consultants	London Waste Regulatory Authority
Home Office	London Fire & Emergency Planning Authority	A2 Dominion
Fields in Trust (FIT)	London Green Belt Council	London Wildlife Trust
Nursing Services	London Middx Archaeological Society	Age Concern Harrow
Metropolitan Public Gardens Association	London Natural History Society C/o British Museum (Natural History)	Planning Advisory Service
Office of Government Commerce	Edgware & Burnt Oak Chamber of Commerce	Martineau UK
Police Architectural Liaison Officers/Crime Prevention Design Advisors	Farmers Union	Commission for Architecture and the Built Environment(CABE)
London Borough of Brent	Forestry Commission East England Conservancy	National Federation, Gypsy Liaison Group
Department for Culture Media & Sport	London Tourist Board	Acton Housing Association
Department for Education and Skills	Hertfordshire County Council	Home Group
Harrow Health Authority	Hertsmere Borough Council	Catalyst Communities Housing Group
Elstree and Borehamwood Town Council	Westminster City Council	West London YMCA
Elstree District Green Belt Society	Royal Mail Letters Planning & Legislation Unit	Metropolitan Police
Department for Environment, Food and Rural Affairs	The Society for the Protection of Ancient Buildings	Ealing Council
Department of Constitutional Affairs	Department for Business, Enterprise and Regulatory Reform (BERR)	Barnet Council
Department of Works and Pensions (DWP)	The House Builders Federation	Three Rivers District Council
Department for Business, Enterprise & Regulatory Reform	Sport England	Harrow East Constituency Conservative Party Assembly Member for Brent & Harrow & LDF Panel Member
London Borough of Camden	Sport England (Greater London Region)	Gareth Thomas MP for West Harrow
Council for the Protection of Rural England(Harrow)	Watford Borough Council	Bob Blackman MP for East Harrow
Council for British Archaeology	Watford Rural Parish Council	Harrow Churches Housing Association
Mark Dowse (Crime Prevention)	Health & Safety Executive	Circle Anglia
Vodafone LTD	Health Services Board	Family Mosaic Housing
Transport for London	Nature Conservancy Council	Chiltern Hundreds Charitable Housing Association Ltd
Transport for London Strategy Group	Network Rail	Dimensions (UK) Limited
London Borough of Haringey	Great Minster House	Jewish Community Housing Association
London Borough of Hillingdon	Group Property and Facilities	John Grooms Housing Association
Brent & Harrow Chamber of Commerce	Property Services Agency	Home Group Limited
BAA Aerodrome Safeguarding	Rail Freight Group	Genesis Housing Group (PCHA Maintenance)
The Civic Trust	Road Haulage Association	Pathmeads Housing Association Ltd
Civil Aviation Authority Safety Regulation Group	Iceni Projects	Genesis Housing Group
London Borough of Hounslow	GLA Biodiversity Group Strategy Directorate	

London Councils
London Development Agency
Harrow and Hillingdon Geological Society
Shepherds Bush Housing Association Limited
Paddington Churches Housing Association Ltd
Paradigm Housing Association
Housing Corporation
Chiltern Hundreds Housing Association (Paradigm Housing Group)
Shepherds Bush Housing Association Limited
Stanmore Christian Housing Association Limited
Peabody Trust
The Abbeyfield Harrow Society Limited
The Guinness Trust
Innisfree Housing Association
Sutherland Housing Association Limited
Inquilab Housing Association Limited
Haig Homes
Anchor Trust
Apna Ghar Housing Association Limited
Network Housing Group
Origin Group
Home Builders Federation
CB Richard Ellis
Nathaniel Lichfield and Partners

URS Corporation Ltd
WYG Planning & Design
Tribal
Tym & Partners

CGMS Consulting
DP9 Town Planning Consultants
MEPK Architects
Metropolis PD
Octavia Housing
Metropolitan Housing Trust Limited
Notting Hill Housing Trust

London Underground
Harrow Hill Chamber of Commerce
London Underground Limited Infrastructure Protection
Drivers Jonas
RPS Group Plc
Pro Vision Plann & Design
DPDS Consulting Group
Dalton Warner Davis

Oxalis Planning
Andrew Martin Associates
Barton Willmore
WS Planning
PB
Turley Associates
GL Hearn Property Consultants
The London Planning Practice
Halcrow Group
Urban Initiatives
Brown Associates
Strategic Leisure
Capita Symonds
Knight, Kavanagh & Page
MWH Global
Gregory Gray Associates

First Plan
Daniel Rinsler & Co
Yurky Cross Architects
Jones Lang LaSalle
UK Planning Manager
Dandara Ltd
Saunders Architects LLP
Savills
Alsop Verrill
Colliers CRE
CB Richard Ellis Ltd
Berkeley Homes

Home Group (Regional Development Director)
Dimensions (UK) Limited
Housing 21
Warren House Estate Residents Association
Worple Residents Association
Augustine Area Residents and Tenants Association
Roxbourne Action Group (RAG)
Aylwards Estate Residents' Association

Canning Road Residents Association
Cannons Community Association
Canons Park Estate Association
Canons Park Residents Association
Alexandra Avenue(Newton Farm) Tenant's Association
Barrowdene Residents Association
Belmont Community Association
Arrowhead Parade Tenants & Residents Association
Bentley Priory Residents Association
Bentley Way Association
Blenheim Road Action Group
Brookshill Residents Association
Afganstan Housing Association
Cherry Croft Residents Association
Chichester Court Association
Claire Court, Elm Hatch, Cherry Croft Residents Association
Claire Gardens Residents Association
Colman Court Residents Association
Copley Residents Association
Waxwell Close Association
Wealdstone Residents Action Group
Wemborough Residents Association
West Harrow Residents Association
Corbins Lane Residents Assoc.
Cottesmore Tenants & Residents Association
Crown Sreet & West Sreet Area Residents Association
Cullington Close Tenants Association
Dalkeith Grove Residents Association

Housing 21
Stadium Housing Association Limited
Servite Houses
LHA-ASRA Group
Veldene Way Residents Association
Victoria Terrace Residents Association
Elmwood Area Residents' Association
Elstree Village Association
Gayton Residents Association
Harrow Weald North Residents Association
Harrow Weald Tenants and Residents Association
Thurlby Close Residents Association
Tyrell Close Tenants Association
Gleneagles Tenants Association
Golf Course Estate Association
Atherton Place Tenants' Association
South Hill Estates Harrow Ltd
Herga Court Residents Association
Gordon Avenue Residents Association
Hobart Place Residents Association
Grange Farm Residents Association
Greenhill Manor Residents Association
Greenhill Residents Association
Greville Court Residents Association
Grove Tenants & Residents Association
Hardwick Court Maisonettes Association
Jubilee Close & James Bedford Close Residents Association
Kenmore Park Tenants and Residents Association
Kenton Area Residents Association
Honeybun Tenants Association
Sonia Court Residents Association
Rowlands Avenue Residents Association
Roxborough Park Residents Association
Roxborough Residents Assoc.
Roxborough Road Residents Association
Rusper Close Residents Association

Cluttons LLP
DTZ
Elm Park Residents' Association
Wilton Place Residents Association
Rayners Lane Tenants & Residents Association
South Harrow & Roxeth Residents Association
The Clonard Way Association
The Cresnet Residents Association
South Hill Estates Residents Association
South Hill Residents Association
South Stanmore Tenants & Residents Association
Lodge Close Tenants Association
Pinnerwood Park Estate Residents Association
Merryfield Court Residents Association
Pinner Road & The Gardens Residents Association
Pinnerwood Park C.A. Residents Association
Manor Park Residents Association
Letchford Terrace Residents Association
Laburnum Court Residents Association
Laing Estates Residents Association
Hardwick Close Flats Association
Harrow Civic Residents Association
Oak Lodge Close Residents Association
Harrow Federation of Tenants & Residents Associations
Pinner Green Council Tenants Association
Pinner Hill Residents Association
Pinner Hill Tenants & Residents Association

Nicola Close Residents Association
Orchard Court Residents Association
South West Stanmore Community Association
Princes Drive Resident Association
Priory Drive Residents Association
Sheridan Place Residents Association
Northwick Manor Residents' Association
Nugents Park Res Association
Mount Park Residents Association

Daneglen Court Residents Assoc
East End Way Residents Association
Edgware Ratepayers Association
Elizabeth Gardens Tenants Association
Roxbourn Action Group (RAG)
Kenton Forum
Winton Gardens Residents Association
Wolverton Road Tenants Association
Cambridge Road Residents Association
Brockley Hill Residents Association
Aerodrome Householders Association
Woodcroft Residents Association
Woodlands Community Association
Woodlands Owner Occupiers
Roxeth First & Middle School
Pinner & District Community Association
Raghuvanshi Chartiabale Trust
Eastcote Conservation Panel
Post Office Property Holdings
Stanmore Golf Club
Stanmore Society
St Anselm's RC Primary School
Sheepcote Road Harrow Management Company Ltd
Iraqi Community Association
Jehovah's Witnesses
John Lyon School
Roxeth Mead School

Royal Association in Aid of Deaf People
Royal National Institute For The Deaf
Kenton Lane Action Group
Kerry Court Residents Greensward Properties Ltd
Grimsdyke Golf Club
Stanmore Chamber of Trade
Herts & Middx Wildlife Trust
Tempsford Court Management Company Ltd
Wembley Rugby Club

Queensbury Circle Tenants Association
The Pinner Association
The Pynnales Close Residents Association
Sudbury Court Residents Association
Eastcote Village Residents Association
Rama Court Residents Association
Harrow Heritage Trust, Harrow Museum & Heritage Centre
The London Playing Fields Society
The National Trust West Middlesex Centre
The Ramblers Association - North West London Group
Harrow Natural History Society
Harrow Nature Conservation Forum
Harrow Partnership for Older People (P.O.P)
Friends of the Earth - Harrow & Brent Group
Hatch End Cricket Club
Estates Bursar Harrow School
Bursar, Harrow School
Orley Farm School
The Twentieth Century Society
The Victorian Society
Harrow Association for Disability
Harrow Association of Voluntary Service
Harrow Athletics Club
Dove Park Management Co
West Harrow Action Committee
Wealdstone Active Community
Clementine Churchill Hospital
Harrow Healthy Living Centre
Hatch End Swimming Pool
Whitmore Sports Centre
Christ Church
Cygnet Hospital Clinic
Flash Musicals
Pinner Wood Children's Centre
Gange Children's Centre
The Garden History Society

Harrow Hill Residents Association
Hatch End Association
The Waxwell Close Association
Hathaway Close Residents Association
Abchurch Residents Association
Hazeldene Drive Tenants & Residents Association
Harrow Dental Centre

Abbey Dental Practice
B Cohen Dental Practice
Bridge Dental Practice
Bright Dental Practice
DentiCare
Dr K A Nathan Dental Practice
Dr Tikam Dental Surgery
Family Dental Care
G Bhuva & J Bhuva Dental Practice
Harrow View Dental Surgery
Harrow Weald Dental Practice
M Ali Dental Practice
N Bahra Dental Practice
S Aurora Dental Practice
Village Surgery
Preston Medical Centre
Streatfield Surgery
GP Direct Medical Centre
Pinn Medical Centre
Simpson House Medical Centre
Enderley Road Medical Centre
Elliot Hall Medical Centre
Aspri Medical Centre
Bacon Lane Surgery
Blackwell House Surgery
Chandos Surgery
Charlton Medical Centre
Civic Medical Centre
Dr. Eddington & Partners (1)

English Golf Union
Harrow Heritage Trust
St Mary's Church
Harrow High Street Association
Friends of Bentley Priory National Reserve
Harrow in Leaf
Kenton Bridge Medical Centre

Kenton Clinic
Mollison Way Medical Centre
Pinner View Medical Centre
Preston Road Surgery
Primary Care Medical Centre
Roxbourne Medical Centre
Savita Medical Centre (1)
Savita Medical Centre (2)
Shaftesbury Medical Centre
St. Peter's Medical Centre
Stanmore Medical Centre
The Circle Practice
The Elmcroft Surgery
The Enterprise Practice
The Harrow Access Unit
The Medical Centre
The Northwick Surgery
The Pinner Road Surgery
Uxendon Crescent Surgery
Wasu Medical Centre
Harrow Public Transport Users Association
Harrow Weald Common Conservators
Zain Medical Centre
Alexandra Avenue Health & Social Care Centre
Belmont Health Centre
Brent & Harrow Consultation Centre
Honeypot Lane Centre
Kenmore Clinic
North Harrow Community Centre

The Georgian Group
Harrow College (Harrow Weald Campus)
Stanmore Park Children's Centre
Whitefriars Children's Centre
Chando's Children's Centre
Grange Children's Centre
Kenmore Park Children's Centre
D Barnett Dental Practice
Greater London Action on Disability
Regard
Age Concern London
Centre for Accessible Environments
Royal Institute of British Architects
Commission for Architecture and the Built Environment
Harrow Association of Disabled People
JMU Access Partnerships
JRF London Office
United Kingdom Institute for Inclusive Design
HoDiS
Litchurch Plaza
Shopmobility
Disabled Foundation
Harrow Crossroads
Harrow Mencap
Mind in Harrow
Community Link Up Inclusion Project
Royal National Institute for Blind People
Royal National Institute for the Deaf
People First
Disability Awareness in Action
National Centre for Independent Living
Headmaster, Harrow School
Our Lady & St Thomas of Canterbury
Pinner Hill Golf Club
Pinner Historical Society
Northwood & Pinner Chamber of Trade G Lines
Peterborough and St Margarets High School for Girls

Dr. Gould & Partners
Dr. Merali & Partners (1)
Dukes Medical Centre
Fryent Way Surgery
Hatch End Medical Centre
Headstone Lane Medical Centre
Headstone Road Surgery
Honeypot Medical Centre
Stimpsons
Mr David Cobb
Pegley D'Arcy Architecture
John Phillips
NVSM Ltd
Roger Hammond
Preston Bennett Holdings Ltd
Studio V Architects
Stephen Wax Associates Ltd
W J McLeod Architect
J G Prideaux
Steene Associates (Architects) Ltd
Stanmore College
Racal Acoustics Ltd
Lloyds TSB
The White Horse PH
Curry Popeck Solicitors
Allan Howard & Co Estate Agent
Miss K Mehta
Mrs Dedhar
Mr Jay Lukha
Mr Patel
Mr Lodhi
Mr James Palmer
Mr Harshan
Mr Sam Fongho
Mr A Ahiya
Ms Pauline Barr
Apollonia Restaurant

Pinner West End Lawn Tennis Club
Pinner Youth & Community Centre
Brady-Maccabi Youth & Community Centre
Grant Road Youth & Community Centre
Henry Jackson Centre
Lawn Tennis Association
Irish Traveller Movement in Britain
Habinteg Housing Association
Sean Simara
Mike Root
Mr Julian Maw
Harrow Agenda 21 Waste & Recycling Group
Harrow and Hillingdon Geological Society
Eileen Kinnear
A J Ferryman & Associates
Anthony J Blyth
ADA Architecture
C & S Associates
C H Mckenzie
PSD Architects
David R Yeaman & Associates
Donald Shearer Architects
D S Worthington
Eley & Associates
G E Pottle & Co
Geoffrey T Dunnell
Jackson Arch & Surveying
H Patel
J Driver Associates
John Hazell
James Rush Associates
Kenneth W Reed & Associates
Naren Hathi
Lawrence-Vacher Partnership
Robin Bretherick Associates
Patel Architects Ltd
PCKO Architects

Pinner Local History Society
Pinner Local History Society
David Kann Associates
Aubrey Technical Services
Mr M Solanki
Mr A Modhwadia
Mr S Freeman
RKA Architecture
Madhu Chippa Associates
Mr J Benaim
Orchard Associates
KDB Building Designs
Jeremy Peter Associates
JC Decaux UK Ltd
Dennis Granston
K Handa
Gillett Macleod Partnership
D Joyner
S Mistry
Saloria Architects
Simpson McHugh
Jeffrey Carr
KDA Designs
Mr Gow
Home Plans
KCP Designs
John Evans
Sureplan
J Loftus
V Sisodia
Anthony Byrne Associates
Top Flight Loft Conversions
S Vekaria
A Frame
David Barnard
A Laight
B Dyer

Mr Harsham
Mr Mark Roche
Ms Cacey Abaraonye
Mr R Shah
Mr Terry Glynn
Nugents Park Residents Association
Linda Robinson
Roxborough Road Residents Association
Bryan Cozens
Merryfield Gardens Residents
John Richards & Co
Mr Cunliffe
LRHEquipment Hire
Mr H Patel
Le Petit Pain
Mrs Jacqueline Farmer
Mr Rashmin Sheth
R Raichura
Pharaoh Associates Ltd
Mr Paul Bawden
Mr Kumar
Mr Deva
Mrs Jill Milbourne
Mr Yousif
Ms Michelle Haeems
Mrs Mandy Hoellersberger
Mr George Apedakih
Mr H Khan
Mr John Fitzpatrick
Mr and Mrs Siddiqi
Mr Shah
Mr Goreeba
Ms Anna Biszczanik
Bhojani, Bhojani Properties Ltd
Mr Damian Buckley
Mr Asury
Mrs Trivedi

Pearson Associates
Pindoria Associates
Richard Sneesby Architects
Mr P Varsani
Satish Vekaria
S S & Partners
Survey Design (Harrow) Ltd
V J McAndrew
Nafis Architecture
N M Architects
Mr Ian Murphy
Gibbs Gillespie Estate Agent
Mr AbdulNoor
Mr B Nieto
Ms Jean Altman
Mr Murray
Mrs Tsang
Paige & Petrook Estate Agent
Mr G Trow
Mr Parekh
Mrs Walker
Mr Abood
Mr Sanders
Mr Tom Johnstone
Mr Daniel Petran
Marchill Management Ltd
Mr Milan Vithlani
Miss Wozniak
Ms Erika Swierczewski
Mr Anat
Mr Patel
Mr T Karuna
Hair 2 Order
Mr John Imade
I Muthucumarasamy Inthusekaran
Ms Marli Suren
Mr M Meke

Sheeley & Associates
Michael Hardman
Canopy Planning Services
E Hannigan
Plans 4 U
P Wells
Mr Sood
Thomas O'Brien
Wyndham & Clarke
Bovis Lend Lease
Fairview New Home Ltd
Mr Suresh Varsani
Rouge Property Limited
Mr S Pervez C/O Mr T Mahmood
The Castle PH
Grimsdyke Hotel
Irene Wears
V A Furby
Kingsfield Arms PH
Mr & Mrs Deller
Raj Shah
Stephen Hassler
Mr Barry
Richard Maylan
Mr Bhupat Patel
Mr Kirit Dholakia
Mr Samit Vadgama
Mr Rasite
Mr Xioutas
Mr B S Bhasin
Mr W Ali
MR Z Patel
Mrs Shah
Mr Kishore Tank
Mr M Khan
Mr Manesh
Mrs Vad

Mr Mark Fernandes
Mr M Selvaratnam
Miss Da Cruz
Mr Mohammed Hyder
Mr P Allam
Mr Kevin Conlon
Mr Shah
Mr Morshed Talukdar
Ms Orci
Mr Oliver Reeves
Mr Michael Moran
Mr SA Syed
Mr Argarwal
Mr R David
Ms Lorraine Wyatt
Mr Vishnukumar
P J Quilter
Mrs M Moladina
Mrs Gill
Mr Pandya
Lrh Equipment Hire
MR Bharat Gorasia
MR Imran Yousof
Miss Wozniak
Mr Gunasekera
Mrs B Murray
Mr R C Patel
Mr Bernard Marimo
Mrs Patel
CCRE Touchstone Ltd
Ms Rena Patel
Mr M Patel
Mr Amory & Glass
Mr V Barot
Mrs Patten
Ms Samia
Mr Anil Mavadia

Team 2 Telecommunications Ltd
Mr Sadiq
Mr Gilani
Mr D Burton
Foxon Property
Mr Reidman
Mr Dillon
Mr E Campbell
Doctor A Savani
Doctor Samantha Perera
Ms Mc Gleen
Mr Shemsi Maliqi
Mr Delroy Ettienne
Mrs Gohil
Ms Yvonne Afendakis
Miss M Lean
Mr Z Hansraj
Mr Raja
Ms Grace Ellis
Doctor Amin
Mr Noel Sheil
Mr Shah
Mr Singh
Mrs Cirillo
Mr Gary Marston
Mrs Lilley
Mr Michael Foti
Helen Stokes
Mrs S Narayan
Mr Depaie Desai
Mr D Morgan
Mrs K V Hirani
Mr Christopher Dixon
Mr and Mrs Patel
Mrs M Patel
Mr P Mantle
Mrs D Nagewadia

Ms Patricia Simpson
Mr Liu
Mr V Pansuria
Mr A Patel
Ms Rena Khan
Dr A Savani
Pk Properties Estate Agent
Mr John Knight
Miss Patricia Long
Mr M Mccarrall
Mr Oliver Abbey
Mrs Lipton
Mr Akhtar
Mr Andrew Lemar
Zoom the Loom Ltd
Miss Mepani
Mr Ali
Mrs Shah
Mr G Vitarana
Mr Ashwan Shah
Mr Simon Bull
Ms Hema Ganesh
Mr S Nathan
Mrs Senanayake
Ventra Management Ltd
Mssr H Carolan
Vantage Property Services
Rawlinson Gold Estate Agent
Mr R Shah
Mr J Meegama
Mr C Patel
Mr N Shah
Mr Alpesh Patel
Mrs Deroy
Mrs H Pereira
Ms Alison Wood
David Conway & Co Estate Agent

Mrs Winnie Potter
Mrs P Naring
University of Westminster
Mr Peter Bennet
Parkfield Estates
Mr Dipack Patel
Mr Jaymesh Patel
Mrs Rabbie
Mr Ahmed
Colin Dean Estate Agents
Mrs Changela
Citywest Properties Ltd
In Residence Estates
Mr K Patel
Philip Shaw Estate Agent
Mr A Patel
Mr Hiren Hirani
AKA
Mrs Scantle Bury
Ms Mutual Shah
Mr Sideras
Mr Wright
Mrs Ahmed
Mrs Anastasia Marshall
Mr V Sorocovich
Dr Vara
Hinton & Bloxham Estate Agent
Raka Properties & Lets Ltd
Mrs Liza
Mr Prajesh Soneji
Mr Shah
Mrs Amanda Fogarty
The Rollands Phelps
Cameron & Associates
PK Properties Estate Agent
Mrs Ved
Mrs N Hindocha

Mrs R J Choudhry
Mr David Michaelson
Mr Yaqub
Mr Wolf
Mr Fabrizio Pisu
Mrs Ram
Mrs Patel
Mr Dattani
MRs Naring
Mr R Harrison
MRs Neetal Khakhria
Mrs Bhudia
Mr Hussain
Mr Vivek Marwaha
Mr Pedro Vas
Hanover Shine Estate Agent
Mrs Hirani
Mr C Karaiskos
High Lawns Hostel
Mr Patel
Ms Mullins
Miss Innis Davis,
Mr Sanjay Patel
Skippers Fish & Chips
MPS Architects
Mr Lavin
Mr Stephenson Mallon
Mr Pravin Bhudia
Mrs Sandra Jenkins
Mr P Nathan
Cumberland Hotel
MR Pulford
Tisser and Aromatherapist
Mr R Dutt
Mr Lanagan
Mrs Garner
Ms J Sanagasegaran

Mr Sandu & H Singh
Mr R Jani
Mr Dar
Bathrooms/Kitchens/Conservatories
Mr Black
D Shemie
Mr A Kidwai
MR Farhan Ebrahimjee
Camerons Jones
Mr D Saran
Mr A Maragh
Mr M Mockler
Mr Bellank
J B Webber Chemist
Mr B Patel
Panstar Group Ltd
Stephen J Woodward Ltd
Mr Hedvit Anderson
Mrs Senanayake
Mr Mitesh Vekaria
Mr S Sharma
Mr Jiten Soni
Doctor A Savani
Mrs Uzma Awam
Mrs Nishma Palasuntheram
Mr Mahmood Sheikh
Mr Brian Watson
Mr K Weerasinghe
Ms Vanisha Patel
Mr Vyas
Mr A Clifford
Mrs Shelagh Kempster
Blue Ocean Property Consultant
Mrs Roth
Mr Kevin Conlon
Mr Ramchurn
Mr K Jabbari

Mr Richards
Mr Jeff Panesar
Mr M Haq
Mr Sidhu
Playfield Management
SPLA
Middlesex Properties
Mr M Fazio
Quainton Hall School
Mr Goodman
Mr A Hanefey
Mr Kahn
Mr Jonjan Kamal
Luigi Hairdresser
Ms Lindsey Simpson,
Mr David Benson
Mr D'Souza
Mr Arshad Minhas
Dr P Sadrani
Mr Eric Lipede
Mrs McKenzie
Mr C Mohotti
Mr Dalius
Miss M Patel
Mr K Nava
Mrs Trivedi
Mr MH Asaria
Mr N Johnstone
Miss F Khan
Mr A Balasusriya
Mr John Campbell
Mr P Lewis
Miss Shah
Mrs Regunathan
Mr Dattani
Mr Brian Lampard
Mr Ralph Jean-Jacques

Mr Mohamed Ariff
Mrs Elliot
Mr N Radia
Mrs S Akhtar
MR Taylor
Castle Estates
Mr Sturrock
Mr Mathew Hutchinson
Mr Bhupinder Singh
MRs J Ahilan
Ms F Bajina
Anscombe & Ringland Est Agent
Mr NG Lakhani
Mr Campbell
Mrs R Draycott
Stephen J Woodward Ltd
Mr G Trow
Burgoyne Johnston Evans
Wilson Hawkins & Co
Mr N Patel
Mr Antonio Branca
Mr Brijesh Mistry
Mr Sanjay Naran
Mr Mohamed Agwah
Mr Ramzan Farooqi
Mr A Jaroudi
Mrs Jacqueline Pepper
Mr Patrick Curran
Mrs Jacqueline Pepper
Mr Saleem
Mr William Hunter
Mrs Q Chow
Mr Khan
Mr Dene Burton
Mr Deva
Mr B Desai
Miss J Parker

Mr McCormack
Mrs Kettles
Mr Rulamaalam Asokan
Mr Alexis
Mr Raymond

Mr Rupesh Valji
Chase Macmillan Estate Agents
Mrs O'Sullivan
Mrs D Ahmed
Mr Dene Burton

Mr R Carnegie
Mr James Kearney
Mr A Ahmed
Mr G Puvanagopan
Mr Patrick Curran

Appendix D – Statement of Representation Procedures for the AAP Issues and Options Consultation

London Borough of Harrow Local Development Framework Consultation (Regulation 25)

Title of documents:

Draft Harrow and Wealdstone Area Action Plan: Issues and Options Consultation
Draft Development Management Policies (DMP): Issues Consultation
Draft Site Allocations (DSA): Issues Consultation

Subject matter:

The above three Development Plan Documents have been prepared as part of Harrow's Local Development Framework.

The Draft Harrow and Wealdstone Area Action Plan issues and options document has been prepared jointly with the Greater London Authority (GLA). It identifies four, alternative development options for the distribution of growth within the Harrow and Wealdstone Intensification Area.

The draft Development Management Policies DMP sets out the policies that will be used to assess and determine planning applications for development outside of the Harrow & Wealdstone Intensification Area. Once adopted, the policies will supersede those contained in the Harrow Unitary Development Plan (2004).

The draft Site Allocations DSA allocates 'proposal sites' for development where opportunities have been identified, and identifies new or revised designations to which planning policies will apply (including open space, shopping frontages and new neighbourhood parades), outside of the Harrow & Wealdstone Intensification Area. Once adopted, the proposal sites and designations will appear on the Harrow proposals map, replacing that which accompanies the Harrow Unitary Development Plan (2004).

Area covered:

The Harrow and Wealdstone Area Action Plan applies to the Harrow and Wealdstone Intensification Area boundary set out in the Draft Proposals Map (April 2011).

The Development Management Policies and the Site Allocations DSA apply to that part of the Borough outside of the Intensification Area boundary.

Period within which representations must be made:

Representations can be made over the six week publication period, beginning on Friday 13th May and ending on Friday 24th June 2011.

Where have the documents been made available, and the places and times at which they can be inspected:

The three DMPs and supporting documentation are available for inspection at the following locations:

- Council's website: www.harrow.gov.uk
- Council's consultation portal: <http://harrow-consult.objective.co.uk/portal>
- Access Harrow: The Civic Centre 1, Station Road, Harrow, HA1 2XF.
- at all Harrow Libraries (the details of which can be found below)

Address	Opening Times	Address	Opening Times
Civic Centre Reference Library Station Road, Harrow, HA1 2UU	Mon.- Thurs 9.30 – 8.00 pm Fri 9.30 – 5.30 pm Sat 9.00 – 5.00 pm	Pinner Library Marsh Road, Pinner HA5 5NQ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed

			Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
Gayton Central Lending Library Garden House, 5, St John's Road, Harrow, HA1 2EL	Mon- Thurs 9.30 – 8.00 pm Fri 9.30 – 5.30 pm Sat 9.00 – 5.00 pm	Rayners Lane Library 226 Imperial Drive, Rayners Lane, HA2 7JH	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
Bob Lawrence Library 6-8 North Parade, Mollison Way, Edgware, HA8 5QH	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	Roxeth Library Northolt Road, South, Harrow, HA2 8EQ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
Hatch End Library Uxbridge Road, Hatch End HA6 4EA	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	Stanmore Library 8 Stanmore Hill, Stanmore, HA7 3BQ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
Kenton Library Kenton Lane, Kenton, HA3 8UJ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	Wealdstone Library The Wealdstone Centre, 38/40 High Street, Wealdstone, HA3 7AE	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
North Harrow Library 429-433 Pinner Road, North Harrow, HA1 4NH	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm		

Making a representation:

The Council welcomes comments on the three DMPs. At this early stage in the plan making process there is no prescribed form for how comments are to be made, however, it does help the Council to analyse comments if the part or section of the document to which they apply. The Council would also encourage people to suggest the changes they would make to the document to address their concern.

Representations can be made:

- through the on-line consultation portal at: <http://harrow-consult.limehouse.co.uk>;
- by email at: ldf@harrow.gov.uk;
- by post to: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Harrow, HA1 2UJ; or
- by fax to: 020 8424 8151

Please note that all representations received will be made publicly available.

Comments must be received by 5pm on Friday 24th June 2011.

Further information:

For any further enquiries, please email ldf@harrow.gov.uk or contact the LDF Team on Tel. 020 8736 6068

Appendix E – AAP Issues and Options Questionnaire



HARROW & WEALDSTONE AREA ACTION PLAN QUESTIONNAIRE

Harrow Local Development Framework

Issues and Option Consultation 13 May – 24 June 2011

For Office Use
Reference:
Date received:
Acknowledgement:

This questionnaire provides a very brief summary of the Issues and Options Consultation document. It is intended to give an overview of the four growth options for future development of the Heart of Harrow to 2026. We would therefore encourage you to refer to the document itself to get a better understanding of the different development options being proposed.

What is the Area Action Plan?

Both the London Plan and Harrow's Core Strategy identify the Heart of Harrow (the Harrow and Wealdstone Intensification Area), as a focus for future growth and development within the Borough, providing for a minimum of 2,500 new homes and 3,000 new full time jobs. The overarching objectives for the Heart of Harrow are set out in the Harrow Core Strategy. These are to raise Harrow's visibility within west London, to strengthen the role of Harrow town centre, to regenerate Wealdstone district centre; to renew Harrow town centre's aging office stock, increase retail and leisure provision, and to secure appropriate infrastructure. However, it is important that such change is managed in a clear and comprehensive manner. The Council and its partners are therefore drawing up an Area Action Plan for the Heart of Harrow. Its purpose is to provide a single, statutory plan to provide clarity and certainty to landowners, developers, service providers and the community about how places and sites within the Heart of Harrow will be developed. The Area Action Plan will contain detailed policies, design guidance, and will allocate sites for specific development uses. It will be used to inform investment decisions and to assess development proposals that come forward over the next fifteen years and beyond.

What is the purpose of the Issues and Options document?

The Issues and Options stage represents the first stage in the Area Action Plan's preparation. It identifies the key issues, challenges and opportunities facing the Heart of Harrow and sets out four alternative development options for how these challenges might be addressed.

The purpose of this round of consultation is to invite public and stakeholder views and comments on the four development options being proposed, to enable people to offer up further information of relevance to developing the Plan, and to provide the opportunity to state a preference for a preferred approach, on which the Council can then progress preparation of the final draft of the Area Action Plan for further consultation towards the end of this year.

How can you make comments?

You can either use this questionnaire to let us know your thoughts on the draft Area Action Plan, or you can comment online at <http://harrow-consult.limehouse.co.uk> or email us at: ldf@harrow.gov.uk or write to us at: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Harrow Council, Civic Centre, PO Box 21, Harrow, HA1 2UJ. The closing date for comments is **Friday 24 June 2011**.

We estimate that this questionnaire will take about 15 minutes to complete. However, the more information you provide us, the better it is for us to understand the issues that matter to you.

Objectives for the Area Action Plan

As stated above the aim of preparing the Area Action Plan is to have a single, statutory plan, that provides clarity and certainty to landowners, developers, service providers and the community about how places and sites within the Intensification Area will develop, and against which investment decisions can be made and development proposals can be assessed. To achieve this the draft (at paragraph 1.7) sets out the following objectives for the Area Action Plan:

- To provide landowners, residents, developers and decision makers with greater certainty as to the distribution, scale, form and function development is to take within the Intensification Area;
- To allocate strategic sites and provide an indication of the type and optimum levels of development to be achieved;
- To provide general, as well as site specific, criteria and design guidance to deliver the agreed form of development;
- To promote Town Centre renewal and, in particular, to clearly define the role and function of Wealdstone and Harrow town centres;
- To secure high quality development of both built form and open spaces;
- To ensure development and growth on individual sites, as well as across the whole of the Intensification Area, embodies best practice in environmental sustainability;
- To provide standards for infrastructure provision including renewable energy, open space, car and cycle parking, and surface water drainage;
- To identify and secure the infrastructure needs of development, including green infrastructure;
- To provide an appropriate level of community services and facilities required to attract development and to serve the community satisfactorily;
- To provide safe and convenient access for all to public buildings and spaces, and to public transport, including those with limited mobility; and
- To determine the appropriate phasing of development taking into account the need to ensure regeneration occurs across the whole of the Intensification Area, including on sites with greater constraints than others.

Question 1

Do you agree with the above objectives for the Area Action Plan?

<input type="radio"/>	Yes
<input type="radio"/>	No
<input type="radio"/>	In part
<input type="radio"/>	Do not know

If not, what changes or additions would you like to see made?

Baseline information

Section 3 of the Issues and Options document provides a summary of the baseline information gathered about the area to date. It includes the existing character, urban form and land uses within

the Intensification Area, and the initial findings of economic and transport assessments carried out. Section 3 concludes by drawing out the various strengths, weaknesses, threats and opportunities present across the area as a whole as well in respect of particular parts or places. This information is important in the plan-making process as it tells us what aspects of the area currently work well or that people value that should be retained or enhanced, those aspect of the place that do not work well that need to be addressed, as well as highlighting opportunities within the area for improvement, new development, etc.

Question 2

Are there any parts of the baseline summary that you disagree with or any additional information you think should be included?

Question 3

Do you agree with the existing strengths, weaknesses, threats and opportunities that have been identified?

<input type="radio"/>	Yes
<input type="radio"/>	No
<input type="radio"/>	In part
<input type="radio"/>	Do not know

If not, what changes or additions would you like to see made?

Key Issues, Challenges and Drivers for change

Section 4 of the Issues and Options document summarises the key area and topic based issues, challenges and opportunities that were identified through the analysis of baseline and market information. These have been taken into account in generating the spatial development strategy options (set out in Chapter 6), ensuring each option being put forward for further consideration adequately addresses these matters.



Question 4

Do you consider that these are the key issues and challenging affecting the Heart of Harrow that the Area Action Plan should address?

<input type="radio"/>	Yes
<input type="radio"/>	No
<input type="radio"/>	In part
<input type="radio"/>	Do not know

If not, what changes or additions would you like to see made?

Development assumptions

Section 5 of the Issues and Options document sets out the development assumptions that have been used in developing the four development options. Such assumptions are important to get right as they do influence the number of homes that an area could potentially accommodate, and therefore the type of homes that might need to be provided, as well as influencing the number of jobs different employment uses might generate.

Question 5

Do you agree with the development assumptions set out in paragraphs 5.5 & 5.6?

<input type="radio"/>	Yes
<input type="radio"/>	No
<input type="radio"/>	In part
<input type="radio"/>	Do not know

If not, what changes or additions would you like to see made?

Potential development sites

Picture 5.1 on page 25 of the Issues and Options document shows the potential development sites that are likely to become available over the Plan period to 2026, and are deliverable, within the Heart of Harrow. During the next stage of the Plan's preparation (i.e. once the preferred development option has been selected), work will be undertaken to demonstrate what will need to be provided on each of these sites, in terms of the type and amount of development to be provided, to deliver the selected development option.

Question 6

Do you agree with the list of potential development sites?

<input type="radio"/>	Yes
<input type="radio"/>	No
<input type="radio"/>	In part
<input type="radio"/>	Do not know

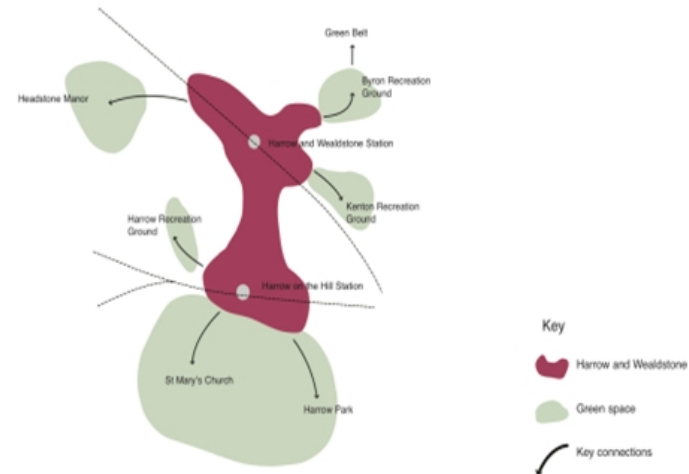
If not, give reasons why you think a site(s) should not be included?

Are there any other sites within the Heart of Harrow you think should be considered for inclusion as a potential development site within the Area Action Plan? Please give details of the reasons you consider the site should be included and, if possible, attach a site plan.

Spatial Development Options

The following is a summary of each of the four options. All four options achieve the Core Strategy objectives for the Heart of Harrow, including the housing and employment targets. It is recommended that you to refer to the document itself to get a better understanding the differences between the development options being proposed.

Option 1: One Centre



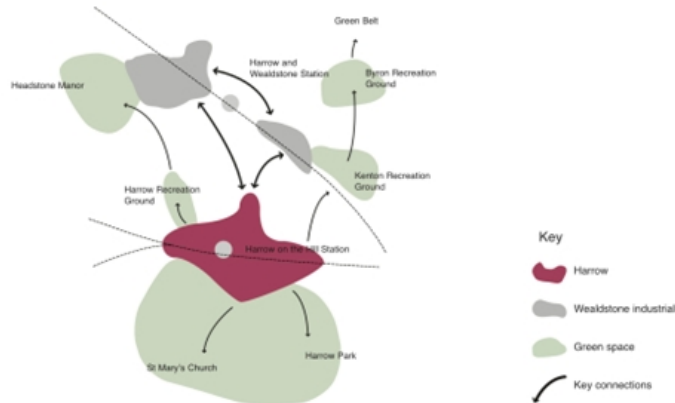
Option description: This option sees Harrow town centre, Station Road, and Wealdstone district centre becoming one centre, with development types (housing and employment) and densities being applied equally across the whole area. A very ambitious option that maximises development outputs on all sites but does not have regard to the existing local characteristic across the area.

Housing and employment numbers: 4,800 jobs and 3,500 homes

Distribution across the Heart of Harrow: Under this option, Wealdstone will deliver just over 50% of the jobs (2,500) and houses (1,900), when infill sites are taken into account, Station Road delivering 12% of both jobs (600) and housing (400), with Harrow town centre providing for about 1,700 jobs (35%) and 1,200 homes (35%). With regard to jobs, Wealdstone would continue to provide for industrial use (5.2ha) but will make an additional contribution towards open space (5.0ha) and community uses (2.2ha), along with modest growth in retail and office provision. Of the 4.4ha of land in Harrow town centre, 25% will provide for new office development, 18% retail and the rest housing, while Station Road would see additional growth in retail and leisure provision.

Likely form of development: The 3,500 new homes will comprise 950 family homes, all in Wealdstone; 1,250 homes of medium density housing (2 - 4 storeys), distributed mostly between Wealdstone and Station Road (570 and 450 homes respectively); and 1,300 homes of higher density 4 - 7+ storeys, with 70% of this being provided in Harrow town centre and the balance in Wealdstone (920 and 380 units respectively).

Option 2: Harrow Plus



Option description: Under this option, most of the growth is to be focused within Harrow town centre. This would align with centres Metropolitan status but would require the majority of housing to be provided for through taller flatted development. However, with the focus on Harrow town centre, this option risks dismissing the role of Wealdstone and Station Road as a commercial areas able to contribute more to economic growth.

Housing and employment numbers: 4,300 jobs and 3,200 homes

Distribution across the Heart of Harrow: Under this option, 60% of the jobs would be provided for in Harrow town centre, with 38% being provided in Wealdstone and only very modest jobs growth (2%) along Station Road. In terms of the distribution of employment, Harrow town centre would provide all growth in retail, leisure, community facility and office growth, while Wealdstone would continue to make provision for mainly industrial jobs. The pattern for housing is much the same, with Harrow town centre making provision for about 1,700 new homes (or 53%), with Wealdstone providing about 1,000 new homes (31%) and Station Road contributing a further 500 homes (or 16% of the total housing growth).

Likely form of development: The 3,200 new homes would comprise 900 family homes and only 100 medium density homes, all in Wealdstone, with 2,200 higher density (4 – 7+ storey) housing being provided along Station Road and within Harrow town centre. It is therefore likely that the bulk of the housing would be in taller flatted housing which, in addition to amenity considerations, presents a risk in terms the markets ability to absorb this level of flatted accommodation.

Option 3: Two Centres



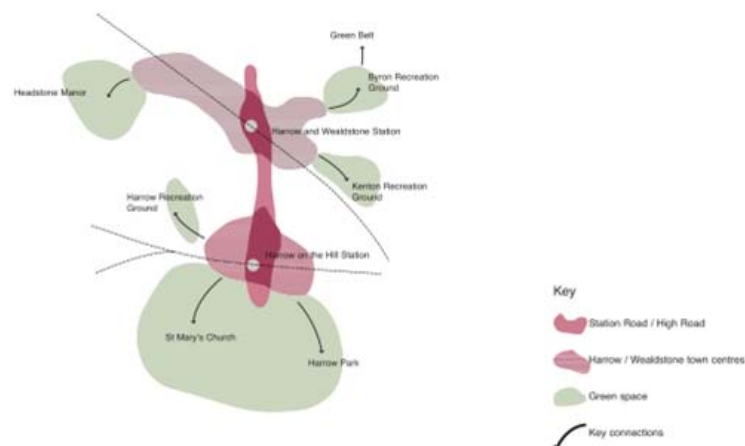
Option description: Under this option, development is split between Harrow town centre and Wealdstone district centre. Station Road is effectively ignored as a location for accommodating growth but retains its function as a transport corridor linking the two centres. The effect of ignoring Station Road's potential is that this option provides the lowest housing and jobs numbers of all the options, but the reduction in overall numbers does enables provision to be made for medium density development across all three sub-areas.

Housing and employment numbers: 3,700 jobs and 2,900 homes

Distribution across the Heart of Harrow: Both Wealdstone and Harrow town centre make provision for over 1,500 new jobs but with Wealdstone providing mostly industry and community employment opportunities and Harrow town centre retail, leisure and office jobs. Wealdstone also makes provision for nearly 60% of the 2,900 homes with the balance being met in Harrow town centre. Under this option, Station Road contributes very little in terms of new houses or jobs.

Likely form of development: The 2,900 new homes would comprise 670 family sized homes, 1,020 medium density homes, and 1,210 higher density dwellings. Like the previous two options, Wealdstone would provide for all the family housing but would also include a mix of medium to high density residential developments. This enables medium density housing to be provided in Harrow town centre alongside very high density development.

Option 4: High Roads and Centres



Option description: Under this option the existing characteristics of the three main sub-areas are enhanced with development sympathetic to each area. The inclusion of Station Road, which is expected to deliver a reasonable portion of jobs and new homes, means that this option results in more jobs and housing than options 3, but does take some pressure off the two town centres to make provision for a greater amount of higher density development.

Housing and employment numbers: 3,900 jobs and 3,200 homes

Distribution across the Heart of Harrow: The vast majority (53%) of the 3,900 jobs to be delivered under option 4 are to be provided in Wealdstone through new industry and community services provision, with a modest increase in retail and office. Both Station Road and Harrow town centre make additional provision for retail, office and community uses, providing 1,430 and 400 new jobs respectively. About 46% of the housing is to be provided in Wealdstone, 19% in Station Road, and 35% in Harrow town centre.

Likely form of development: The 3,200 new homes would comprise 1,170 family sized homes, 940 medium density homes, and 1,090 higher density dwellings. Like the previous two options, Wealdstone would provide for all the family housing but would also include a mix of medium to high density residential developments. This enables medium density housing to be provided in Harrow town centre alongside very high density development. Of the 1,460

Comparison table

The following table provides a summary of the amount of development to be delivered in each of the three sub-areas under each development option.

		Harrow town centre	Station Road	Wealdstone	Totals
Housing	Option 1	1,200 Total 240 Mid density 420 Mid - High 540 High density	400 Total 400 Mid density	1,900 Total 950 Family 570 Mid density 380 Mid - High	3,500
	Option 2	1,700 Total 935 Mid - High 765 High density	500 Total 500 Mid - High	1,000 Total 900 Family 100 Mid density	3,200
	Option 3	1,130 Total 340 Mid density 110 Mid - High 680 High density	100 Total 100 Mid density	1,670 Total 670 Family 585 Mid density 415 Mid - High	2,900
	Option 4	1,130 Total 340 Mid density 110 Mid - High 680 High density	600 Total 600 Mid density	1,470 Total 1,175 Family 295 Mid - High	3,200
Jobs	Option 1	1,860 Total 360 Retail & leisure 1,260 Office 240 Community	500 Total 400 Retail & leisure 100 Community	2,440 Total 800 Industry 440 Retail & leisure 940 Office 260 Community	4,800
	Option 2	2,480 Total 280 Retail & leisure 1,960 Office 240 Community	100 Total 100 Community	1,720 Total 1,200 Industry 220 Retail & leisure 240 Office 260 Community	4,300
	Option 3	1,780 Total 380 Retail & leisure 1,160 Office 240 Community	10 Total 10 Community	1,920 Total 700 Industry 220 Retail & leisure 740 Office 260 Community	3,700
	Option 4	1,480 Total 380 Retail & leisure 860 Office 240 Community	400 Total 300 Retail & leisure 100 Community	2,020 Total 800 Industry 220 Retail & leisure 740 Office 260 Community	3,900

Question 7

We would like to know your preference for the future development option on which to progress the next stage of the Area Action Plan. Please select the one option, out of the four development options, you most prefer and then rank the four options (with 1 being the option you like the most and 4 being the option you like the least).

	Ranking
<input type="radio"/> Option 1	
<input type="radio"/> Option 2	
<input type="radio"/> Option 3	
<input type="radio"/> Option 4	
<input type="radio"/> None	
<input type="radio"/> Do not know	

Can you please give the key reasons for why you chose the option you did?

In terms of your least favoured option, could you please state why you did not like that option?

If you did not select a preferred option, could you please give a reason for not doing so. In addition, are there any other alternative options you can think of that the Council could have considered?

Question 8

Do you have any other comments on the draft Area Action Plan Issues and Options document that you wish to make?

Other policy documents currently out for consultation

In addition to the draft Area Action Plan, the Council has also prepared, and is currently consulting on the draft Site Allocations DPD and the draft Development Management Policies DPD. In summary, the Site Allocations document seeks to allocate sites for housing development and other land uses to give effect to the agreed pattern of growth set out in the Harrow Core Strategy. The Development Management Policies seek to give effect to the objectives and Core Policies of the Core Strategy by setting out detailed criteria based policies against which applications for new development will be considered and assessed.

A questionnaire has not been prepared for these documents, however, the Council is keen to get your views on:

Site Allocations DPD

- whether there are any additional sites that should be included for consideration
- whether the boundaries of the sites identified are correct
- whether the supporting information is accurate and clear about future development prospects

Development Management Policies DPD

- whether the policies are effective in giving effect to the Core Strategy
- whether the scope of the policies is right
- how clear the policies are, as well as the supporting justification

The documents and all supporting information is available from the Council consultation portal at <http://harrow-consult.limehouse.co.uk/portal>

Personal Details

Please complete the following information about yourself to help us monitor and improve our public consultations.

The information you supply will be used for the purpose of the LDF consultation. This data will be maintained in accordance with the Data Protection Act 1998 and will not be passed on or sold to any other organisation without your prior approval unless this is a legal requirement.

If you wish to be included on the Council's LDF consultation database please tick this box

Name

Address.....

Postcode

E-mail

(please ensure this a valid e-mail address if you wish to be notified of future consultations)

Telephone

Are you:

A resident of Harrow Borough

Someone who works in Harrow Borough

Someone who visits Harrow Borough

Representing a group or organisation

A Planning Agent or developer

Thank you for taking the time to respond. Please remember the consultation closes on 24 June 2011.

What happens next?

At the end of the consultation period in June, all of the responses will be analysed. We will compile the results of the consultation in a report which will be made available on our website in August 2011.

Based on the responses received, decisions will be made on which development option to progress with. We will then work this up with detailed policies and site allocations over the summer and anticipate publishing the final draft in November for further public consultation.

If you would like to find out more about the Local Development Framework, or wish to receive notifications about new planning documents, please ensure you have entered a valid e-mail address above or you can call the LDF Team on 020 8736 6084 or email us at ldf@harrow.gov.uk

Appendix F - List of Specific Consultation Bodies

Greater London Authority
English Heritage (London Region)
The Coal Authority
Environment Agency
The Historic Buildings & Monuments Commission for England
Natural England, London & South East Region
Natural England, London & South East Region
London Midland
Harrow Primary Care Trust
Defence Infrastructure Organisation
British Gas PLC Group
EDF Energy
Thames Water Utilities Ltd
Thames Water Property
Veolia Water Central
Homes and Communities Agency - London
Planning Inspectorate
Communities and Local Government
Entec on behalf of National Grid

Appendix G – Notification Letter to Specific Consultation Bodies on the AAP Issues and Options Consultation



Addressee here

Place Shaping
Andrew Trehern
Corporate Director

09 May 2011

Dear

Harrow Local Development Framework (LDF) – Public Consultation 13 May – 24 June 2011.

**Harrow and Wealdstone Area Action Plan DPD: Issues and Options
Draft Development Management DPD
Draft Site Allocations DPD**

I am writing to invite you to take part on the first stage of public consultation on three new Development Plan Documents which will form an important part of Harrow's emerging Local Development Framework.

Harrow and Wealdstone Area Action Plan

This document is being prepared jointly with Greater London Authority (GLA). It sets out four different options to manage growth and development in the Harrow and Wealdstone Intensification Area, to ensure the document delivers the social, environmental and economic outcomes sought for the area – notably the delivery of 2,500 new homes and 3000 new jobs. This Area Action Plan will ultimately guide development in the area and will be used in dealing with planning applications. We are seeking your views on these four options, to see which strategy we take forward and develop into a preferred option.

Development Management Policies

The Development Management DPD sets out our initial approach to managing development outside of the Intensification Area through establishing the specific standards and policy criteria that new development will be expected to meet, and against which planning applications will be considered. This DPD has been developed to give effect to the Spatial Strategy set out in Harrow's Core Strategy. We are seeking your views on whether you agree with our detailed policies for managing growth.

Site Allocations DPD

The Site Allocations DPD allocates sites and identifies other planning designations outside of the Harrow and Wealdstone Intensification Area. The draft document identifies the locations

and sites for specific types of development, such as housing and employment, and sites to be protected through planning policies, including retail frontages and open spaces, in order to ensure the vision, objectives and spatial development strategy of the Core Strategy are given effect and implemented. We are seeking your views on these designations, and whether you agree with our proposed use for certain sites, or are there alternatives that have not been included?

Please find enclosed a hard copy of the three DPDs, along with the Statement of Representations Procedure and a CD containing: an electronic version of the DPDs; a copy of the questionnaire for the Harrow & Wealdstone Area Action Plan; a copy of the Sustainability Appraisal report into all three documents; a copy of the Equalities Impact Assessments undertaken of each document; and the Habitats Assessment.

How to get involved

We would like to know what you think about these draft documents. This first period of consultation on the three new DPDs will last for 6 weeks. We will take into account any comments made when revising these documents for a further round of public consultation later this year.

You can view these documents and comment online at <http://harrow-consult.limehouse.co.uk/portal>. You may also send your response by email to ldfconsultation@harrow.gov.uk or reply by post to:

Planning Policy Team, Room 301, Harrow Council, Civic Centre, Station Road,
Harrow HA1 2XF

We will also be holding drop in sessions where you can view the draft documents and discuss their content with members of the LDF team. Please view local press and the Council LDF pages for details.

For further information, please see the Council's website at www.harrow.gov.uk/ldf or email ldfconsultation@harrow.gov.uk.

Following this initial consultation, the Council will consider the comments received and revise the documents where appropriate before publishing them for further consultation later in 2011.

Yours faithfully,

Andrew Trehern
Corporate Director of Place Shaping
Harrow Council

Appendix H – Half Page Advertisement run in the Harrow Observer on 12th and 19th May 2011

Ever wish you could change Harrow?

**Where in Harrow town centre and Wealdstone do you
want to see new homes and jobs?**

**What criteria should be used for deciding planning
applications in the Borough?**

**Which sites should be developed for housing in the
Borough?**

**We want to hear your views on three
draft town plans.**

Come and talk to us at a roadshow near you!

See the Council's website for further details:

<http://www.harrow.gov.uk/heartofharrow>

Harrow COUNCIL
LONDON

Appendix I – AAP Issues and Options Consultation Colour Leaflet for Distribution at Public Events



You can help!

We have identified four development options to regenerate the Harrow and Wealdstone area - what we call the Heart of Harrow. Each option aims to increase jobs and housing in the area, but we can only deliver one of the four options.



Which option will you decide?

Tell us which one you prefer by completing the online questionnaire at www.harrow.gov.uk/heartofharrow. It takes only 10 minutes and you can help decide the future of the Heart of Harrow. Closing date for responses, 24th June 2011.

We need your help



Harrow and Wealdstone area development

The Council is producing an exciting new plan to revitalise Wealdstone, Station Road and Harrow Town Centre - what we call the Heart of Harrow.

It is the borough's economic, shopping and leisure centre and really important for the future of all of Harrow. It is important that we have a vision for the area so that we can attract new investment, create more jobs, improve the shopping and leisure offer, and deliver on the Mayor of London's target for new homes.

We need your help



Appendix J – AAP Issues and Options Consultation Short Questionnaire

You can view and comment on the draft plans using the Council's online consultation portal:

<http://harrow-consult.limehouse.co.uk/portal>

Alternatively you can download a questionnaire from the above website and reply by e-mail to:

ldfconsultation@harrow.gov.uk

You can also view the document at all the Borough's libraries and post replies to:

Freepost
RLZL-GGTG-YBTG
Planning Policy Team,
Room 301,
Harrow Council,
Civic Centre,
Station Road,
Harrow
HA1 2XF

If you want to contact the LDF team, please email:

ldfconsultation@harrow.gov.uk

or telephone:

020 8736 6086

The Consultation closes on the 24th June 2011



Help shape new plans for Harrow

Residents, community groups and local business have already helped to shape Harrow's Core Strategy. The Core Strategy is the Borough's main town plan for the next 15 years which will see a new urban centre of housing, shops and job opportunities in Harrow town centre and Wealdstone - the 'Heart of Harrow'.

Your help is needed again. Both the London Plan and Harrow's Core Strategy identify the Heart of Harrow (the Harrow and Wealdstone Intensification Area), as a focus for future growth and development within the Borough, providing for a minimum of 2,500 new homes and 3,000 new full time jobs.

The Council would like your views about how these plans should take shape.

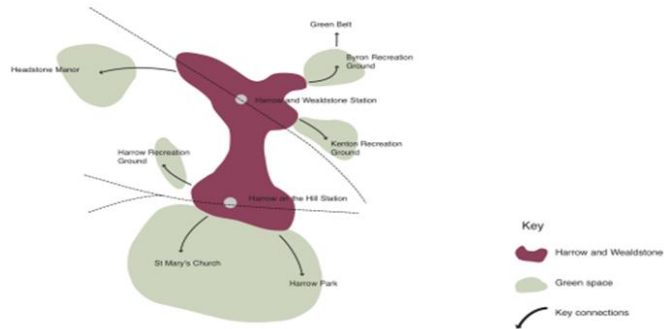
This leaflet explains more about the plans and how you can get involved.



LDF

Local Development Framework

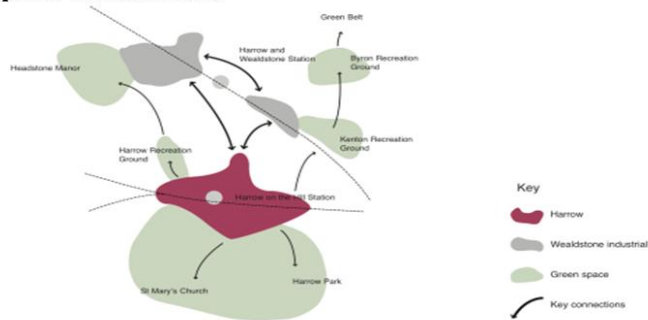
Option 1: One Centre



Option description: This option sees Harrow town centre, Station Road, and Wealdstone district centre becoming one centre, with development types (housing and employment) and densities being applied equally across the whole area. A very ambitious option that maximises development outputs on all sites but does not have regard to the existing local characteristic across the area.

Housing and employment numbers: 4,800 jobs and 3,500 homes

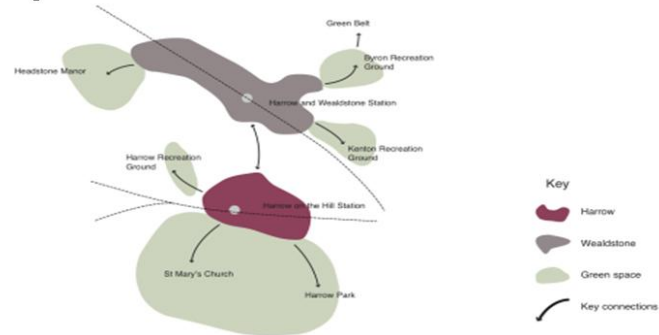
Option 2: Harrow Plus



Option description: Under this option, most of the growth is to be focused within Harrow town centre. This would align with centres Metropolitan status but would require the majority of housing to be provided for through taller flatted development. However, with the focus on Harrow town centre, this option risks dismissing the role of Wealdstone and Station Road as a commercial areas able to contribute more to economic growth.

Housing and employment numbers: 4,300 jobs and 3,200 homes

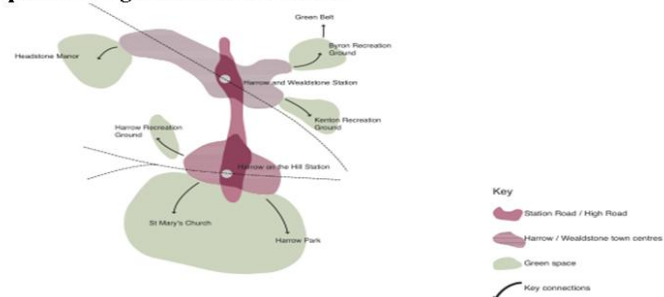
Option 3: Two Centres



Option description: Under this option, development is split between Harrow town centre and Wealdstone district centre. Station Road is effectively ignored as a location for accommodating growth but retains its function as a transport corridor linking the two centres. The effect of ignoring Station Road's potential is that this option provides the lowest housing and jobs numbers of all the options, but the reduction in overall numbers does enable provision to be made for medium density development across all three sub-areas.

Housing and employment numbers: 3,700 jobs and 2,900 homes

Option 4: High Roads and Centres



Option description: Under this option the existing characteristics of the three main sub-areas are enhanced with development sympathetic to each area. The inclusion of Station Road, which is expected to deliver a reasonable portion of jobs and new homes, means that this option results in more jobs and housing than options 3, but does take some pressure off the two town centres to make provision for a greater amount of higher density development.

Housing and employment numbers: 3,900 jobs and 3,200 homes

Appendix K – List of Respondents to the AAP Issue and Options Consultation

ID no.	Respondent	ID no.	Respondent
1	Eileen Kinnear	29	Natural England
2	Keith Perrin	30	John Orchard
3	Phillip O'Dell	31	David Yeaman
4	Pat Burman	32	CBRE - Dandara
5	Tom Vahey	33	CGMS – Met Police
6	Jonathan Barker	34	Harrow Civic Residents Association
7	Sharon Ward	35	Roxborough Road Residents' Association
8	E. Spencer	36	Dr M Lowrie
9	Andrew Reed	37	Christopher Langley
10	Thames Water	38	Environment Agency
11	PPM Planning	39	TfL Corporate Finance – Property Development
12	Helen Riley	40	Harrow Friends of the Earth
13	Richard Maylan	41	Harrow Weald Tenants and Residents Association
14	BNP Paribas (on behalf of Post Office)	42	Katherine and Jack Bye
15	Mrs M Bristow	43	Penoyre & Prased LLP on behalf of ColArt
16	Alan Richardson	44	GVA on behalf of AIB Ltd
17	Elaine Slow	45	Kervin Fontaine-Waldron
18	Gabor Otvos	46	Brian Murphy
19	Harrow Agenda 21	47	David Summers
20	Savills on behalf of Lyon and Equitable House	48	Helen Shorter
21	Andrew Graham - Salvatorian College	49	Preston Bennett on behalf of MP&G Trading

ID no.	Respondent	ID no.	Respondent
22	Hatch End Association	50	CBRE on behalf of Land Securities
23	Father McAllister	51	Roxborough Residents Association
24	Greater London Authority	52	Harrow School - Estates
25	Campaign for a Better Harrow Environment	53	Mr H German
26	Governing Body of Whitefriars Community School	54	English Heritage
27	Russell Sutcliffe	55	Anonymous 1
28	Dr A Shah	56	Anonymous 2
		57	Mark Brown

Appendix L – Responses to the AAP Issues and Options Consultation

ID	Rep No.	Section / Para	Summary of Comments	Change Suggested / Area of Concern	Council Response
1	001	-	Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage. We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk , on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website. Alternatively, please mark all paper consultation documents and correspondence for the attention of Planning and Local Authority Liaison. Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).	None	Noted
2	002	-	<p>Policy CS2 Harrow and Wealdstone is broadly supported, especially sub condition (P).</p> <p>Natural England has recently produced the London Landscape Framework which gives further guidance on the natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the Green Grid section of the Core Strategy. The London Landscape Framework can be found at: http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx</p> <p>The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites. Subject to the above Natural England has no further substantive comments to make on this consultation document</p>	Refer to the London Landscape Framework and also look at the fragmentation of open spaces and the linking of them back to paths and other	This comment relates to the Core Strategy Policy CS2 to which the APP seeks to give effect. The comments made have been addressed in the Council's consideration of the representations made to the Regulation 27 consultation and submission of the Core Strategy to the Planning Inspectorate.
3	003	-	I agree with the overall objectives of the Plan.	None	Support is noted
4	004	-	We would like to see soonest, a more detailed draft from the consultants, for our comments.	More detail wanted	Noted – further consultation to be undertaken on the Council's Preferred Option in September
5	005	-	Link to the emerging Harrow Core Strategy Against the backdrop of national planning policy and the Replacement London Plan, the Harrow Core Strategy sets out the overarching vision for the Harrow and Wealdstone Intensification Area. The AAP should be clear that the Intensification Area is being driven by the objectives of the Replacement London Plan. The Spatial Vision of the emerging Core Strategy outlines that the	See representation to the Core Strategy and others made to the draft AAP	The vision for the AAP will come in the next phase of the AAP's preparation and will reflect the Council's preferred development

ID	Rep No.	Section / Para	Summary of Comments	Change Suggested / Area of Concern	Council Response
			<p>Intensification Area should deliver via the AAP the following:- "Comprehensive and coordinated regeneration activity will have positively transformed the Harrow & Wealdstone Intensification Area, delivering at least 2,500 net new homes and 3,000 additional new jobs and creating diverse and varied neighbourhoods where people choose to live and work. Harrow town centre will be a vibrant and attractive Metropolitan Centre having benefited from additional retail, leisure and hotel development, and having renewed much of its older office stock...Station Road will have benefited from redevelopment and environmental improvement as the principal component that binds the two centres together. Harrow on the Hill Station, Harrow bus station and Harrow and Wealdstone Station will be accessible major public transport nodes. New development will have contributed to a coherent new character achieving high standards of sustainability, public realm and residential quality". As outlined in our representations to the emerging Harrow Core Strategy, Dandara welcome the Council's ambitions for the Intensification Area and they are keen to work alongside the Council to contribute towards the delivery of new homes, new jobs and local improvements through the redevelopment of the former post office site at College Road. The AAP acknowledges in part that residential uses are appropriate for the town centre but the overarching vision must clearly state this to be the case instead of only referencing retail, leisure and hotel development'. Indeed, the proposed redevelopment of the College Road site could contribute approximately 410 new homes, new jobs and a variety of deliverable local improvements which could benefit the community and significantly regenerate this part of the town centre. Submission Draft Core Policy 2 of the emerging Harrow Core Strategy sets out the policy direction for the Intensification Area and is appended to the AAP (Appendix 1). To avoid repetition, we have enclosed our submitted representations to the Submitted Draft Core Strategy which comments on this key policy and outlines our views on matters such as tall buildings, public viewpoints / identified views, affordable housing, sustainability, open space / public realm / play space, infrastructure improvements and CIL / Section 106 requirements. We will consider some of these subject matters in the following paragraphs but we would be grateful if this representation was read in conjunction with our enclosed comments on the emerging Core Strategy.</p>		<p>strategy for the Intensification Area. The representation made to the Core Strategy is noted and in many respects is considered to be more relevant to the detail of the Area Action Plan, which will establish the policy framework for tall buildings within the Intensification Area, including the management and identification of views and vistas. These, along with the other matters raised will be the subject of further consultation to be undertaken on the Council's Preferred Option for the Area Action Plan in September.</p>
6	006	1.1	<p>The Kodak site is mentioned elsewhere in the documentation, so why is it not included in the Intensification area? It would be a disgrace to make decisions about development in the existing area separately from Kodak. In particular, less homes would be needed in the area if the unique opportunity to provide homes at Kodak</p>	<p>Clarify that the Kodak site is in the Intensification Area</p>	<p>No specific sites are mentioned in the Introduction. The Kodak site is included within the Intensification Area covered by the Area</p>

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					Action Plan and is specifically referenced in other parts of the document. The AAP will set the context for the future development of the Kodak site, having regard to the deliver of the objectives for the whole of the Intensification Area.
7	007	1.1	<p>The GLA and TfL are part of a steering group which has provided comments during the pre-consultation stages of the Harrow and Wealdstone Area Action Plan development process. GLA family comments are, therefore, largely incorporated already within the consultation document. Overall, the principle of establishing a framework to promote and manage growth in Harrow and Wealdstone is welcomed. The GLA family supports a strategy which takes advantage of strategic sites and high levels of public transport accessibility in Harrow town centre, and agrees that this should assist in facilitating growth and regeneration in Wealdstone, supported by improved connections along Station Road. The GLA family, therefore, particularly supports "Option 4 - High Roads and Centres" as this will allow for a holistic and integrated approach to be taken to growth across the Intensification Area.</p>	None	Support for Option 4 is noted
8	008	1.1	<p>We recognise that developing a cohesive plan to regenerate a town centre such as ours is a difficult task. The aspiration to develop a high quality environment has to be balanced against the particular problems of Harrow: shortage of suitable sites, constraints of the transport system, geographical separation from the Hill, and lack of funding. In general we agree with the aspirations of the AAP but we have concerns about the accuracy of some of the evidence base, the effectiveness and desirability of some parts of the plan, and the apparent absence of contingency plans if events do not work out as anticipated. We give our detailed comments below with reference to paragraphs where appropriate.</p> <p>Regeneration The introduction to the AAP states that the aim of the IA is not just to provide for an expanding population but to regenerate Harrow so that it retains its status as a Metropolitan centre. We agree with that aim but this document does not convince us that regeneration will be successful. Much depends on providing the infrastructure necessary for attracting business into Harrow from outside. This</p>	It is crucial that commercial and infrastructure development begins ahead of residential development	The Council notes the concerns held with some of the evidence base, much of which was prepared in support of the Core Strategy. Further evidence base, in terms of transport, site capacity, and infrastructure will be undertaken in the course of developing the Preferred Option, which will be subject to further public consultation in September. The constraint on public

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			<p>not only depends on providing adequate transport links, appropriate commercial space and a high quality environment but also incentives. There is no discussion in the AAP of how this will be achieved. There is also no treatment of how developments will be phased in, except in terms of regulating the flow of property onto the market. It is crucial that commercial and infrastructure development begins ahead of residential development. Partly because once land is used up for residential purposes it will be too late to change course if it is then found that more space is needed for business or community infrastructure. Secondly encouraging an influx of residents without jobs or infrastructure to meet their needs will force them to go elsewhere to work and spend their money, either to central London or to adjacent boroughs. The Croxley link of the Metropolitan line to Watford High St may be only 4 years away and will increase Watford's competitiveness as a retail and leisure centre substantially. The Minister for the Environment, Caroline Spelman, has recently stressed that adequate infrastructure must be in place before expansion occurs (Interview on Radio 4 Today programme, 10 June 2011; reported later in the Times).</p>		<p>funding, especially for funding infrastructure, means that more than ever there is a reliance on the private sector to deliver the improvements needed and this is unlikely to take place prior to development coming forward. The Council's preference is to seek development and infrastructure investment run in tandem, which again comes down to phasing and viability.</p>
9	009	1.1	<p>Planning Potential act on behalf of ColArt Fine Art & Graphics Ltd and Fairview New Homes Ltd. The ColArt Site in Wealdstone is included within the boundary of the Harrow and Wealdstone Intensification Area (HWIA) identified in the Core Strategy Submission Document and emerging Replacement London Plan. ColArt has manufactured Winsor & Newton art products from its Wealdstone site on Whitefriars Avenue for more than 70 years. The company is moving its production to France and will close the Wealdstone Factory by the end of 2011. The site therefore represents an excellent redevelopment opportunity that will tie in with the aims of the HWIA. We have had the opportunity to consider the contents of the recently published Harrow and Wealdstone Area Action Plan: Issues and Options consultation document (AAP), which sets out four spatial development strategy options, and set out within this document, our client's comments on the issues raised and the various options. Having considered the contents of the Area Action Plan and the supporting evidence, it is quite clear that the ColArt Site is a strategically important site within the HWIA, particularly the housing objectives. It is considered that this soon to be vacant commercial site presents an opportunity to bring forward new residential development. A site location plan identifying the ColArt Site is contained at Appendix 1. A Site Study prepared by Penoyre & Prasad Architects, demonstrating the sites' opportunities, and capacity to accommodate a range of building types, scale and massing, is contained at Appendix 2.</p>	<p>The ColArt Site is a strategically important site within the HWIA and that its redevelopment will be intrinsic to meeting the aims and objectives of the HWIA, particularly the housing objectives</p>	<p>Consideration of the redevelopment potential or future uses of the Colart site must be considered in the context of the delivery of the vision and objectives for the whole of the Intensification Area, to better understand what part this site can and will play in the delivery of the area as a whole. The Council would encourage Colart to therefore engage in preparing the AAP prior to making any determination of the future potential uses of this site.</p>
9	010	1.1	<p>Before we analyse the contents of the AAP and outline what we consider the</p>	<p>AAP represents the</p>	<p>The Council notes that</p>

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			<p>ColArt Site should be brought forward for as part of the HWIA, it is important to consider the policy context for the consultation document. The Draft Replacement London Plan published in October 2009 has been found to be sound by the appointed Inspector, subject to minor amendments. The intended adoption version of the London Plan was reported to the Secretary of State at the end of April and a response is expected in the next couple of weeks. The GLA will then formally adopt the document, subject to the direction received from the Secretary of State. The Draft London Plan identifies a number of Opportunity and Intensification Areas across London, which are typically built-up areas with good existing or potential transport accessibility which can support higher density redevelopment and have significant capacity for new jobs and homes. Councils are encouraged to progress and implement planning frameworks to realise the potential of such areas, and the Mayor will provide strategic support where necessary. Following Harrow Council's promotion of Harrow and Wealdstone as an Intensification Area in the early phases of the preparation of their Core Strategy, the Mayor chose to support this and include the area as an identified Intensification Area in the London Plan. Annex 1 of the Draft London Plan states: This new Intensification Area offers significant opportunity for urban renewal and intensification, providing the impetus to regenerate Wealdstone and rejuvenate Harrow town centre. Capacity exists to deliver substantial employment growth through an uplift in retail, office and hotel development within the town centres and the intensification of industrial and other business use within the Wealdstone Industrial Area. There is also scope to accommodate a substantial portion of the Borough's future housing need through the delivery of higher density residential and mixed use development on key strategic sites and renewal areas where development is matched by investment in infrastructure and achieves high standards of design and sustainability. The HWIA is therefore of significant regional importance, and in meeting the identified aims and objectives for the area, particularly in respect of housing and employment growth, will benefit not only the local area, but London as a whole. The Core Strategy is being submitted to the Secretary of State for independent Examination in late June 2011. We understand that once the document has been through the Examination and the Inspector's binding report is received, provided the document is found to be sound, the Core Strategy will be formally adopted by Harrow Council. Core Policy CS 1 of the Core Strategy Submission Document sets out the overarching objectives for growth in Harrow. The first objective is that the HWIA will be the focus for regeneration, where a significant proportion of the new development identified for the Borough will be provided. Almost half of all new homes to be built in Harrow over the plan period</p>	<p>perfect opportunity to review the Wealdstone Preferred Industrial Location</p>	<p>the SIL applies only to the main Kodak site and Waverley Industrial Estate. The rest of the Wealdstone Industrial Area is covered by a local industrial and business designation under the UDP. As set out in the Core Strategy, any consolidation of the existing industrial sites in Wealdstone is to be considered in the context of preparing the AAP, which will consider the role each site is to play in delivering the objectives and vision for the Intensification Area. The Council would encourage Colart to therefore engage in preparing the AAP prior to making any determination of the future potential uses of this site.</p>

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			<p>(2009 to 2026) will be provided in the HWIA. The Draft Replacement London Plan requires the Council to build 350 new homes per year, giving an overall target of 5250 new homes over the plan period. In accordance with the Local Plan, Harrow Council intends to deliver 5,345 new homes, with 2,500 directed to the HWIA. A significant amount of employment growth is also directed to the HWIA. A minimum of 3000 jobs are required to be delivered within the HWIA over the plan period. Part O of Policy CS1 states the Borough's stock of business and industrial premises will be monitored and managed to meet economic needs. It goes on to state that: " Subject to consideration being given to the consolidation of the Wealdstone Strategic Industrial Location through the AAP, taking into account the strategic objectives for the HWIA, surplus stock will be released for other uses in accordance with the following sequential approach: Non-allocated sites; Poorer quality allocated sites not within strategic industrial locations; Other allocated sites not within strategic industrial locations; Poorer quality sites within strategic industrial locations; and Other allocated sites within strategic industrial locations. This policy demonstrates that the Council anticipates there will be surplus employment stock in the area going forward that can be released for other types of use. We have further regard to this point in Section 4 of our representation. Policy C2 of the Core Strategy, which relates specifically to the HWIA (and discussed in more detail below), also makes reference to the Council's intention to consider the consolidation of the Wealdstone Strategic Industrial Location (WSIL) specifically in terms of its function and boundary, taking account of the assessments of industrial land demand and the strategic objectives for the HWIA. From discussions with Officers, the Wealdstone Strategic Industrial Location (referred to as the Wealdstone Preferred Industrial Location in the Unitary Development Plan) was designated by the GLA as a Strategic Industrial Location (SIL) in the London Plan, and based on the Council's interpretation of the GLA designation, currently includes various industrial sites in Wealdstone: British Rail Goods Yard, Barratt Way Industrial Estate, Christchurch Industrial Estate, Cliveden Centre, Crystal Centre, Hawthorne Centre, Kodak site, Palmerston Road, Rosslyn Crescent, Waverley Industrial Park, Whitefriars Industrial Estate and the ColArt Site. Officers have advised that during the consultation on the Core Strategy Regulation 25 document, the Council received comments from the GLA advising that the SIL should only cover two sites in Wealdstone (The Kodak Site and the Waverley Industrial Estate). The Council is therefore being encouraged to formally review their WSIL accordingly through the AAP. We understand that for consistency the Council will be publishing a schedule of minor amendments to the Core Strategy Submission Document next week, which will include the</p>		

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			<p>amendment to the WSIL. We consider this amendment to be key to the preparation of the AAP and therefore we reserve the right to submit further comments which have regard to the proposed amendment, in due course. We consider the AAP represents the perfect opportunity to review the Wealdstone Preferred Industrial Location and agree that the amended boundary should reflect the recent discussions with the GLA regarding the SIL. We consider that the review should be evidence-led and have regard to the findings of the Employment Land Review which ranks the industrial sites within the Borough, including those sites contained within the Wealdstone Preferred Industrial Location, in order of quality of employment land/space. Those sites which rank highly should obviously be given priority over those sites which rank poorly, when considering which sites should be included. Officers have advised that this issue will be considered in the second round of consultation on the AAP which is expected at the end of the year. Chapter 5 of the Core Strategy Submission Document is solely concerned with the HWIA. The boundary of the HWIA is shown at Picture 8 of the document. The diagram identifies broad areas for residential and employment led development. We note that two-housing led development areas are specifically identified - land located along the A409 (Station Road), and the ColArt Site. The employment-led sites are identified along the railway line corridor, which encompasses the large Kodak site, and the two town centres. As discussed above, the London Plan makes clear that employment growth will be met through a combination of an uplift in retail, office and hotel development in the town centres, and the intensification of industrial and business sites within the Wealdstone Industrial Area. This is reiterated in paragraph 2.16 of the Core Strategy. Worthy of note, is that the third objective for the HWIA states that the Council will seek to: "Regenerate Wealdstone district centre and ensure employment led redevelopment of the surrounding industrial estates, including the Kodak site, contribute to its long-term growth and vitality". Policy CS2 sets out the Council's key policies for the HWIA, which makes clear that the Council will work with delivery partners to actively market and promote the HWIA as a focus for significant development, growth and investment. It also makes clear that a minimum of 2,500 net new homes will be required to be delivered in the HWIA over the plan period and that the AAP will identify and allocate sufficient sites to deliver this quantum of housing. Mixed use development is also to be promoted.</p>		
9	011	1.1	<p>Having reviewed the AAP consultation document, we consider that: The ColArt site is capable of being accommodated in all 4 Options. However, based on the Council's own evidence base and the opportunities and constraints outlined in document prepared by Penoyre & Prasad, we consider that the ColArt Site is a</p>	<p>Consider that the ColArt site is capable of being accommodated in all</p>	<p>The Council does not have a view at this time as to the suitability or otherwise of the Colart</p>

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			<p>suitable site for residential development, most readily within Options 1, 3 and 4, which represent the most appropriate spatial development strategy for the delivery of the objectives of the Harrow and Wealdstone Intensification Area, in that they direct new growth to both town centres. Â Notwithstanding this, it is vital that the Council has some regard to specific sites at this stage of the plan preparation to ensure that the new growth identified can actually be delivered. The ColArt Site is a strategically important site within the HWIA and its redevelopment will be intrinsic to meeting the aims and objectives of the HWIA. Â The site's immediate availability for redevelopment will help the Council make decisions about the sites they identify for particular uses to ensure the overall objectives for housing and employment growth are met. The Council's own evidence base concludes that the site is clearly constrained for future industrial and employment uses. Â Supported by the Core Strategy, the site provides an excellent opportunity for much needed, sustainable residential development in the HWIA. 5.2 The Government has given clear direction over the past 12 months that it intends to support and encourage development. There now exists a default presumption in favour of sustainable development, specifically those that encourage growth and jobs. 5.3 In his announcement on 15 June 2011, Gregg Clerk (Minister of State for Decentralisation) stated that there is a presumption in favour of sustainable development at the heart of the planning system, which should be central to the approach taken to both plan-making and decision-taking. Local Planning Authorities are encouraged to plan positively and prepare local plans that meet development needs and provide the flexibility required to respond to shifts in demand and other economic changes. Mr Clerk specifically stated: "Britain urgently needs new homes, new green energy and transport links, and space for businesses to grow. By putting this presumption at the heart of our new framework we will give the planning system a wake up call so the right sort of development, that everyone agrees is needed, gets approval without delay." He went on to say that: "This change to planning policy will speed up development, while placing a strong emphasis on the protection of the environment and local communities' interests. By insisting on sustainable growth we can help make sure that what we build today leaves a positive legacy for future generations." 5.4 It is considered that the redevelopment of the ColArt site for residential development reflects the thrust of the Government's emerging policy, and is fully supported by the local, and up to date, evidence base.</p>	<p>4 Options but is suitable for residential development, most readily within Options 1, 3 and 4</p>	<p>site as a potential residential site or not. As set out in the Core Strategy and the objectives of the AAP, the intention is to consider the consolidation of existing industrial estates to promote mixed use development where this secures the long-term employment use of these sites and provides for an intensification and/or diversification of employment use. It is within this context that the future development potential of the Colart site must be considered. The Council would therefore encourage Colart to engage in preparing the AAP prior to making any determination of the future potential uses of this site.</p>
10	012	Picture 1.1	<p>The link between the Kodak site and Wealdstone High Street and Station needs to be dramatically improved with improved pedestrian and vehicular access, hard and soft landscaping and lighting.</p>	<p>Link between the Kodak site and Wealdstone High Street and Station</p>	<p>Noted, this will be picked up in undertaking the stage 2 materplan work, which is currently</p>

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				needs to be dramatically improved	underway.
7	013	Picture 1.1	For clarity the Council should seek to make a distinction between local and strategic industrial land on this key diagram, in order to identify the Strategic Industrial Location in Wealdstone.	Distinguish between local and strategic industrial land on this key diagram	Agreed, the key diagram will be updated to clarify SIL from local industrial and business area designations
9	014	Picture 1.1	The Draft Site Specific Allocations DPD has been published for consultation at the same time as the HWAAP Issues and Options document. From review, this document is Borough wide, and makes clear that it does not include the HWIA and that the AAP will allocate sites for future development within this area. Our representations therefore focus solely on this AAP. Ordinarily in an AAP we would be seeking site specific promotion. We understand that the Council will pursue this detail in later consultation, and we will therefore support and work with the Council to demonstrate the suitability of our client's site.	None	As stated in the representation, the Council will be consulting on the site specific proposals in September.
3	015	1.2	I agree with the area identified as the focus for future growth and development of facilities and amenities in Harrow.	None	Support is noted
9	016	1.2	CONSIDERATION OF THE AAP CONSULTATION DOCUMENT - Picture 8 of the Core Strategy identifying the extent of the HWIA, and which identifies the ColArt site for potential residential development, is reproduced at page 2 of the AAP consultation document. Paragraph 1.2 states that the HWIA "is not just about providing for new development and physical growth, it is also about regeneration and the realisation of the social benefits and improvements to the overall quality of place that new development can deliver". We discuss this important point further in Section 4 of our representation. The document makes clear at paragraph 1.13 that the minimum standards for new jobs and new homes to be provided in the HWIA have been confirmed in the Core Strategy and therefore these matters are not subject to further consideration. The AAP must, therefore, respond appropriately, by being able to deliver. The focus of the document is therefore on identifying options for future development, having regard to the twenty Potential Strategic Development Sites identified within the HWIA, which, we note, includes the ColArt site (Site 3). The document states that the majority of these sites were identified through the assessments undertaken as part of the London-wide Housing Capacity Study. The others are either the subject of current planning applications or early pre-application discussions, or have been identified by the forum groups and the consultant team as sites that might contribute to the future character of the area and the Core Strategy targets. We consider the options in turn below:	None	None

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11	017	1.3	When was the boundary fixed? I have a number of issues.	Query over when the IA boundary was fixed	The Boundary for the Intensification Area was the subject of consultation on the Core Strategy Preferred Option in November 2009.
12	018	1.4	Paragraph 1.4 of the consultation document confirms that the purpose of the AAP boundary is to, amongst other things, ensure that connection to "the town centre" is included. It is considered that reference should instead be made to town centres here, in recognition of the fact that the H&WAAP covers both Harrow and Wealdstone centres	Reference should instead be made to town centres	Agreed, this was an error and should have read town centres referring to both Harrow and Wealdstone town centres
11	019	1.5	And will continue to be ad hoc until a town centre design guide is formulated.	None	The Area Action Plan is being prepared in favour of a town centre design guide, as it has greater statutory weight being a Development Plan Document.
11	020	1.6	Why are there site allocations then?	Clarify why there are site allocations	The Council considers it necessary to include site allocations in the AAP to give clarity as to site specific proposed future development and use.
13	021	1.7	As a Practice Manager of a Local surgery I am concerned about the increased demand for GP services in this area caused by increased housing. How are you working with local health professionals in this development?	Concerned with increased demand for GPs	The Council is continuing to engage with its LSP, which includes the PCT, over future healthcare requirements and provision. These are identified in the Infrastructure Delivery Plan but will be subject to further work undertaken on the AAP specifically on physical infrastructure requirements to support development within the Intensification Area

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14	022	1.7	<p>The build any high rise developments outside of Harrow Town Centre would be disastrous. I hope because Dandra has failed to build its three monsters in Harrow Town Centre that they don't try to hijack the Kodak site. Most boroughs are knocking down high building in favour of a return to family homes. The Kodak site could be used to combine a mix of really trendy riverside accommodation with retail units underneath to build a whole new shopping and living experience that links to Wealdstone and fantastic transport links that would encourage young professionals to the area.</p>	Concern with building heights	During Stage 2 of the masterplan, the consultants with undertake detailed urban design analysis needed to consider the appropriateness of tall buildings and potential locations, if any, within the Intensification Area, and will establish the policy framework required. This will be the subject of consultation in September
2	023	1.7	<p>Paragraph 1.7 lists eleven objectives for the Area Action Plan which can be broadly supported, especially; "To secure high quality of both built form and open spaces" "To provide standards for infrastructure provision including renewable energy, open space, car and cycle parking and surface water drainage" "To identify and secure the infrastructure needs of development, including green infrastructure" The last objective is particularly welcome and commended</p>	None	Support for the objectives are noted
3	024	1.7	<p>To my mind, high quality in development terms includes architectural merit, harmony with surroundings and the enhancement of existing areas of beauty such as St. Mary's Church, the Hill and the Harrow Weald. Some existing buildings, mostly from the twenties and thirties, also are worth preserving and incorporating in future schemes. Design and planning guidelines should include these considerations.</p>	Design and planning guidelines should include consideration of the quality of the existing built form.	Stage 2 of the masterplan will involved a more detailed urban design analysis that will capture the design merits of the existing built form, highlighting those aspects worthy of management through development control.
11	025	1.7	<p>To provide ALL landowners. Why allocate strategic sites. this is way too easy. It is much more important to include all the ageing stock in the analysis and to find a way to develop the difficult bits. It is missing the key element of a town centre design guide.</p>	Clarification of why the AAP will allocate sites	The AAP must demonstrate the ability to deliver the homes and jobs proposed for the area to be found sound. Site allocations enable this but can and should

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					include the more difficult sites required for place shaping and will include phasing to ensure these come forward early in the plan period.
4	026	1.7	Whilst the objectives are clear, the summary is too vague and probably unnecessary.	The summary is too vague and probably unnecessary	The Council considers the summary is necessary to establish the purpose of the objectives
15	027	1.7	We should like to see, in addition, the following objectives: To provide a safe and attractive pedestrian environment; To establish a hierarchy for access in which the needs of disabled people, pedestrians, cyclists and public transport users are given priority over use of private cars; To achieve a significant reduction of the proportion of local journeys made by car; To rid the area of poorly designed large buildings in which an excessive amount of car parking dominates the street scene (e.g. the present Civic Centre).	Promotes further objectives	The Council considers that some of the proposed objectives are already covered by the broader objectives, but obviously not at the level of detail proposed. The Council will consider amendments to the objectives to better incorporate the sentiments of the proposed additions.
16	028	1.7	The problems are likely to be 1) Defining the most important objectives; which will take precedence if there is a conflict? 2) What control does the Council have realistically over the process / timescale of development.	Clarification over the priority to be afforded to objectives and controls over phasing	No priority is assigned to the objectives. There are a number of mechanisms the Council can use to control the phasing of development, in particular, requirements for infrastructure provision. However, in most respects new development is needed to part fund new infrastructure so both are expected to take place in tandem.

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17	029	1.7	More homes available for homeless people	Homes for homeless people	A portion of the new housing is expected to be affordable and made available to people on the Council's housing register.
18	030	1.7	Agree with the objectives plus add other disabilities.	Include other disabilities	Agreed – mobility is just one example but the intention of the objective is to ensure accessible buildings, spaces and transport for all residents.
54	031	1.7	We only partly agree with the objectives of the Area Action Plan. We are concerned about high buildings hiding the heritage site of Harrow on the Hill. The Vista of the Hill has already been ruined for those living in Salisbury Road and Harrow View. (Perhaps the latter should be renamed). High Rise living is not for families as has been widely proved.(Please refer to the London Plan regarding vistas -page 176 onwards)	Concern with building heights	During Stage 2 of the masterplan, the consultants with undertake detailed urban design analysis needed to consider the appropriateness of tall buildings and potential locations, if any, within the Intensification Area, and will establish the policy framework required. This will be the subject of consultation in January
56	032	1.7	Bus Station changed to another location. Post Office site maybe an option	Look at moving the bus station	Proposals for redevelopment of the Bus Station will be considered through further consultation with TfL.
57	033	1.7	Major revamp of the Bus Station with a rebuild of the Old Post Office and Harrow on the Hill tube station. College Road banned for traffic except for buses and taxis as far as traffic lights adjacent to bus station, would like to see St Annes road covered in.	Major revamp of the Bus Station and proposals for College and St Ann's Road	Proposals for redevelopment of the Bus Station will be considered through further consultation with TfL.
19	034	1.21	There has not been any consultation with residents as to these proposals which have been drummed up by Harrow Council without regard to the impact these	Affected residents not be adequately	The purpose in publishing the draft documents is to

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			<p>proposals will have on many peoples lives. Why are these policies not formulated after consulting the people who are affected. You have proposed around 500 housing units in Stanmore in these proposals. Stanmore residents are under the impression this questionnaire relates to harrow and Wealdstone as Stanmore is not included in the title. Consultation with those people affected in the areas affected first. For instance, a resident of Paxfold was completely unaware of the proposals for Paxfold - why is this? If Harrow Council wishes to go ahead with any of these proposals, the inhabitants are pretty disillusioned as to any consultation anyway. Given that the Ashtons rushed through housing on our prime Green belt land, Wood Farm, despite an over 8,000 petition, it is obvious to us that we are ignored.</p>	consulted	<p>enable residents to share their views on the proposals before the documents are finalised. The process for preparing and consulting on the documents is prescribed by the Regulations and Council's Statement of Community Involvement, which requires the Council to respond to comments received and to show how these are being taken forward or not, and to state why. This report seeks in part to fulfil that requirement. Should people wish to be directly consulted on the emerging LDF the Council holds a database of consultees.</p>
7	035	2	No specific comments	None	Noted
12	036	2.1	<p>Paragraphs 2.1 and 2.2 of the Issues and Options document refer to the need to take account of proposed reforms affecting the planning system (as and when they come forward) within future iterations of the AAP. This acknowledgement is supported, in the context of the emerging Localism Bill and the potential for changes to planning policy at the national level going forward. In Land Securities' view, this acknowledgement could also usefully be extended to include changes in housing and welfare reform as well as planning policy. The AAP must be sufficiently flexible to deal with changing circumstances, both in a policy context and with regard to site-specific circumstances.</p>	<p>In addition to potential reforms to the planning system, extend this to include changes in housing and welfare</p>	<p>Agreed. These additional matters are taken into account although not explicitly referenced in the document and could usefully be.</p>
11	037	2.5	Delivery needs to look further than the strategic sites.	Delivery	<p>The masterplan will consider those additional sites and requirements beyond the strategic sites that are equally important to delivering the place</p>

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					agenda that the AAP will set for the area.
12	038	2.6	Paragraph 2.6 refers to the Strategic Industrial Location (SIL) designation within the Intensification Area as applying to the Kodak site and Waverley Industrial Estate. The Wealdstone SIL designation covers a number of industrial sites including those listed, and notably extends to the east of the railway line. It is therefore considered that it would be sufficient to simply refer to the Wealdstone SIL here.	Refer to all industrial sites in Wealdstone as being SIL	The Council has received clarification from the GLA that the SIL only applies to the main Kodak site and Waverly Estate. All other employment sites in Wealdstone are therefore still allocated locally as industrial and business use areas in the UDP
11	039	2.8	Should look much further than 15 years.	Query the plan period	15 years is considered nationally to be an appropriate time horizon on which to plan for areas. However, the vision for the area should remain relevant over a much longer period
11	040	2.9	Where is older stock identified? How will it be vibrant in the town centre? There are no strategic sites in the town centres. It must be looked at more holistically. Wealdstone will not be a successful district shopping centre if it has the life sucked out of it by the Kodak site redevelopment. There are no specific proposals for Station Road. Need a Town Centre Design guide for these ambitions to succeed. When are we going to see any detail about the strategic objectives. We have seen a lot of stuff about Kodak but not in relation to the important Town Centre areas. Where has the town centre office stock been identified.	Need to identify older stock to promote renewal	The intention was to identify and agree the overall approach to be progressed for the Intensification Area, and then through the stage 2 work consider the existing urban form, including buildings in need of protection or renewal crucial to the delivery of objectives, the design and feel of an area.
14	041	2.10	The 2500+ homes to be created should not be packed into one specific region and be sympathetic to the area. To build anything high rise outside Harrow Town Centre would kill off any hope of regenerating the area. Wealdstone high street is already starting to look overrun with modern flats and is starting to feel claustrophobic.	2500+ homes to be created should not be packed into one specific region	This matter has been adequately addressed through consultation on the Core Strategy, which is the appropriate document within which

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					such decision must be made. The AAP is intended to give effect to the Core Strategy and is not a further means by which to have these matters reconsidered.
2	042	2.10	Under paragraph 2.10 - Strategic Objectives for the Intensification Areas, are listed which are also welcomed and in particular; "Secure improvements to the accessibility of parks and open spaces by walking and cycling from within the intensification area". This last objective also links in to the Area Action Plan Objectives listed under paragraph 1.7 above, and these links are to be encouraged.	None	Support is noted
20	043	2.10	Re: the strategic objectives for the Intensification Area stipulated to "Improve the amenity and connectivity of Station Road", I would assert that the capacity to improve the latter is severely limited to the width restriction of that road (one lane of traffic in both directions). There is no obvious remedy to this restriction apart from some radical measure such as compulsory purchase of property on one side of the road with the intention of widening it, which would be a major upheaval to the local community, a huge expense and not justified on cost-benefit terms.	Existing constraints to improvements to Station Road	Further transport modelling will be undertaken of the Preferred Option, the outcome of which will be options for improvements.
10	044	2.10	Station Road needs improving along its length with developers and landowners encouraged to redevelop the tired and aging buildings. The council should look to incentives for owners and developers to create new ribbon development of four to six storeys with ground floor public realm and new residential accommodation above with balconies and terraces stepping back from the street frontage. A comprehensive town centre design guide addressing the existing building stock and providing for buildings of four to six storeys would take the pressure off the council looking towards over-developing the strategic sites with tall buildings to achieve the target of 2,500 new homes. Station Road should be considered more as a boulevard with tree planting, break-out piazza seating areas, improved public transport and pedestrian access.	Proposals for redevelopment along Station Road and renewal of existing building stock negating need for taller buildings	The proposals for Station Road are noted. The existing built form and the proposals for Station Road itself will be considered in more detail through the Preferred Option, which will look at opportunities to protect or renew existing buildings considered crucial to the delivery of objectives, including the design and feel of an area.
12	045	2.10	Paragraph 2.10 of the AAP consultation document sets out the strategic objectives for the Intensification Area included within the latest iteration of the Council's draft Core Strategy. Please refer to the formal representations submitted to Harrow Council by CB Richard Ellis on behalf of Land Securities in	Suggested changes made to the strategic objectives of the Core Strategy	The Council notes the representation made by CB Richard Ellis to the strategic objectives of the

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			respect of the Council's Pre-Submission Core Strategy for comments on these strategic objectives. Please also refer to Land Securities' Core Strategy representations for comments in respect of Core Policy 2 (as referenced in paragraph 2.11 of the H&WAAP).		Core Strategy. The Council notes that this section of the AAP may need to be updated to take account of the Inspectors recommendations to the Core Strategy
57	46	2.10	Re: the strategic objectives for the Intensification Area stipulated to "Improve the amenity and connectivity of Station Road", I would assert that the capacity to improve the latter is severely limited to the width restriction of that road (one lane of traffic in both directions). There is no obvious remedy to this restriction apart from some radical measure such as compulsory purchase of property on one side of the road with the intention of widening it, which would be a major upheaval to the local community, a huge expense and not justified on cost-benefit terms.	The only way to improve the capacity of Station Road is to compulsory purchase property to widen it.	This paragraph simply re-states the objectives for Station Road as set out in the Core Strategy. However the Preferred Option will provide greater detail on measures for realising the objective for Station Road, recognising the existing constraints.
21	047	2.12	This section should include a reference to the development control recommendations in the SFRA which should be implemented as part of new development. We suggest you alter the wording to: "...give effect to, and implement, the policies, proposals and recommendations of other Council, and our partners' strategies, plans, programmes and assessments. These include..... and the LB Harrow Strategic Flood Risk Assessment."	Reference should be made to the recommendations of the SFRA	This section of the AAP deals with links to other strategies rather than to the findings and recommendations of the evidence base. This might be more appropriately addressed at the Preferred Option stage in respect of more detailed development management policies on flood risk management both across the Intensification Area and site specific requirements
12	048	2.13	The second bullet point under paragraph 2.13 of the consultation document states that the AAP will "give effect to the ambitions of the Local Plan in applying the Intensification Area designation to the area, alongside other strategic designations applying to Harrow town centre and the Wealdstone Strategic	Appears to be pre-judging the maintenance of the Wealdstone SIL	The Core Strategy is clear that the AAP will consider the consolidation of the SIL,

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			Industrial Location." As currently drafted, this appears to be pre-judging the maintenance of the Wealdstone SIL by inferring that the AAP policies will sit "alongside" the SIL, whereas the AAP policies should be considering the spatial planning of the Intensification Area in a holistic way, including (as opposed to alongside) consideration of the SIL.		therefore a SIL designation will still remain to be appropriately managed.
22	049	3	Greenhill and Wealdstone include highest levels of unemployment in Harrow. The lower the skill level and salary, the shorter the commuting distance that a worker undertakes. (GLA Economics Working Paper 36). We would welcome creation of entry level jobs (retail, hospitality) in the town centre and intensification area through the implementation of the Area Action Plan.	Welcome the creation of entry level jobs (retail, hospitality) in the town centre and intensification area	Support is noted
23	050	3	Section 3 of the Issues and Options document provides a summary of the baseline information gathered about the area to date. It includes the existing character, urban form and land uses within the Intensification Area, and the initial findings of economic and transport assessments carried out. Section 3 concludes by drawing out the various strengths, weaknesses, threats and opportunities present across the area as a whole as well in respect of particular parts or places. This information is important in the plan-making process as it tells us what aspects of the area currently work well or that people value that should be retained or enhanced, those aspect of the place that do not work well that need to be addressed, as well as highlighting opportunities within the area for improvement, new development, etc.	None	Support for the SWOT analysis is noted
7	051	3	no specific comments	None	Noted
15	052	3	We agree broadly with the summary, but would like to see some small amendments and additions: In the final sentence of 3.6 cyclists should be added to pedestrians and car-users. We feel that, in 3.8, mention should be made of the poor environment for pedestrians and cyclists in much of Station Road north of the Town Centre. The particular need for affordable family housing should be mentioned in 3.10. We think that the emphasis in the final sentence of 3.12 is somewhat misplaced. The fact that makes this area atypical of Harrow as a whole is that more than half its inhabitants lead a car-free lifestyle. In any development proposals, this proportion must be at least maintained and, preferably, increased. 3.22 should make explicit reference to the need for much improved east-west services in Wealdstone.	Various additions to the baseline information	The Council agrees with the all the suggested amendments and will update this section accordingly
9	053	3	Evidence Base - The emerging Local Development Framework is supported by a number of technical evidenced-based documents, including the Employment Land Review undertaken by Nathaniel Lichfield and Partners (November 2010) and Annual Monitoring Reports which set out the Council's 5-year housing land supply and past delivery. The Employment Land Review, which is very much up to date, assesses a total of 28 developed, allocated and potential employment	Seeks to show how the existing evidence base supports the development of the Colart site for residential	The Council does not have a view at this time as to the suitability or otherwise of the Colart site, or any other site, as a potential residential site

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			<p>sites identified by the Council. The assessment specifically looked at the quality and adequacy of the employment sites to meet future needs. Each site was scored against a number of criteria including: strategic and local road access, accessibility to public transport and services, compatibility of adjoining uses, internal environment, including the quality and condition of existing buildings, site size and potential development constraints, and attractiveness to the market, including vacancy and market activity on sites. A number of the sites that have been assessed in the Employment Land Review are identified as Strategic sites in the AAP. These include the Kodak site, the ColArt site, Harrow Civic Offices and Palmerstone Road Industrial Estate. All but the ColArt site are considered to be either good or average quality employment land and are ranked significantly higher than the ColArt site which is considered to be of poor quality. This is discussed further in Section 4. The most recent Annual Monitoring Report (2009 / 2010) shows that the Council has achieved high annual housing delivery rates in recent years. However, it is not clear whether this remains achievable over the plan period, given long term trends. The AMR shows that the Council has sufficient supply of deliverable sites to meet its five year housing supply target (as required by PPS3). However, looking at the Council's schedule of sites, it would appear that a number of the sites that the Council is reliant on for meeting their 5-year supply are sites benefiting from extant planning permissions, which have either lapsed or are about to lapse (based on the year permission was granted). We also note that the number of units said to be delivered each year on some of the larger sites (phasing) are considered far too high. We note that there are a significant number of sites that are within the 5 year supply that have not been commenced, and the expiry of the consents are likely to have recently passed, or, are about to. Paragraph 58 of PPS3 clearly states that "... Local Planning Authorities should not include sites for which they have granted planning permission unless they can demonstrate, based on robust evidence, that the sites are developable and are likely to contribute to housing delivery at the point envisaged." We note the CLG Practice Guidance 'Strategic Housing Land Availability Assessments' echoes this guidance, where it states at para 39 that "...the existence of a planning permission does not necessarily mean that the site is available...". The West London Strategic Housing Market Assessment (2010) notes at para 127 that the Harrow AMR precedes the economic downturn, and this will have a major implication on future trends. The Borough Housing Strategy (2007-2014) notes key challenges, including; improve neighbourhoods and the quality of life, and making better use of resources. One of the 5 priority objectives echoes this challenge, in seeking to improve neighbourhoods. PPS3 requires Local Planning Authorities to maintain a</p>	development	<p>or not. As set out in the Core Strategy and the objectives of the AAP, the intention is to consider the consolidation of existing industrial estates to promote mixed use development where this secures the long-term employment use of these sites and provides for an intensification and/or diversification of employment use. It is within this context that the future development potential of the Colart site must be considered. The Council would therefore encourage Colart to engage in preparing the AAP prior to making any determination of the future potential uses of this site.</p>

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			flexible and responsive supply of housing land. This approach assists in balancing past deliveries and future trends. When read alongside Core Strategy Policy CS2, the approach is to deliver a minimum of 2,500 new homes, and the Council must take a proactive and balanced approach to ensure the objectives can be delivered. 2.29 We therefore consider it vital that the AAP is flexible enough to ensure that the housing growth identified in the area is delivered, in the event other sites do not come forward.		
9	054	3	It is clear that the HWIA is of significant regional and local importance. It will deliver considerable new development over the plan period, including almost half of Harrow's housing requirement. It is also clear that the ColArt Site is considered to be a key site within the HWIA in that it is identified as a potential residential-led site. Notwithstanding this, it is clear that regardless of the site's end use, this site is critical to achieving the objectives of the HWIA. The AAP will be the vehicle to deliver the objectives of the HWIA. It is therefore vital that the AAP is prepared having regard to the views of developers and landowners in the area to ensure that the right sites come forward for the right development over the plan period. In preparing the AAP, the Council will need to plan for the timely delivery of new housing and employment land, ensure that identified sites are fully optimised, be realistic when identifying sites for future growth to ensure the objectives of the HWIA are achieved and respond to local considerations and drivers. The evidence which supports the preparation of the Council's Local Development Framework demonstrates that the ColArt site is a poor quality employment site and therefore an alternative use should be considered through the AAP. As we explain in Section 4 of our representation, we consider the site lends itself to residential development. Indeed, we note that the proposed draft National Planning Guidance prepared by the Practitioners Advisory Group (May 2011) states on page 19 that: "Local planning authorities should avoid the long term protection of employment land or floorspace and treat applications for alternative uses of designated land or buildings on their merits having regard to market signals and the relative need for different land uses". In terms of housing, the draft guidance states that the government's key housing objective is to 'significantly increase the delivery of new homes' (page 32). The planning system should aim to deliver a sufficient quantity, quality and range of housing. The AAP therefore represents a good opportunity for the Council to review existing designated employment sites that are no longer suitable or required for employment use, and to re-designate them for other uses, particularly residential use, in accordance with the Government's emerging policies.		The APP will consider the existing employment designations applying to land within the Intensification Area with the objective of securing the intensification and long-term retention of such sites in employment use, drawing on the wider definition of economic development provided by PPS4. However, at this time the Council does not have a view as to the suitability or otherwise of the Colart site, or any other site, as a potential residential site or not.
17	055	3	I do not agree with any of it	None	Noted
54	056	3	The number of children will be increased; there is no mention of a new school to	No mention of a new	The Infrastructure

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			<p>meet demand. Likewise a new health Centre will be needed. Is NPH going to be able to cope with the new influx of population?</p>	<p>school to meet demand.</p>	<p>Delivery Plan and the Core Strategy identified the need for a new infrastructure to serve the Intensification Area, including a Primary School, GP provision, and towards the end of the plan period the requirement for a new secondary school. Further detail of the infrastructure requirements will be outlined in the course of consulting on the Preferred Option in January</p>
54	057	3	<p>There are concerns about overcrowding people and hope that there is not over development. Play spaces for children where Mothers/carers can see them are important.</p>	<p>Concerns regarding overcrowding, play space provision</p>	<p>The AAP seeks to optimise development of sites in preference to maximising development of site. Provision will need to be made for addition play space for both children and youth.</p>
56	058	3	<p>St George's Centre has a very good façade and looks very good from the outside</p>	<p>None</p>	<p>Noted</p>
11	059	3.3	<p>Since when has the civic centre been a unique borough asset? Headstone Manor shouldn't even be within the intensification area.</p>	<p>When has the civic centre been a unique borough asset</p>	<p>It is a Borough asset in respect of the services it provides not necessarily the building itself. Headstone Manor is included in the Intensification Area to ensure redevelopment of the Zoom Leisure site provides the opportunity to improve access and</p>

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					connectivity of this important asset.
4	060	3.3	Please stress the need for these assets to be more easily accessible.	Make important borough assets more accessible	The Council agrees these assets should be more accessible to the public
12	061	3.5	Paragraph 3.5 of the consultation document confirms that "Wealdstone...comprises...the vast majority of the Borough's industrial land, most notably the Kodak site but also clusters of smaller sites to the east of George Gange Way." It is considered that reference should instead be made simply to the Wealdstone SIL, on the basis that it is inappropriate to make reference to specific sites within this wider designation. The use of the word "vast" is also considered to be unnecessary, given the reference to "majority" within paragraph 3.5 as currently drafted.	Reference should be made simply to the Wealdstone SIL	As stated previously the Council has received confirmation of the SIL designation in Wealdstone and it is consider appropriate to refer to this where appropriate.
10	062	3.6	Wealdstone High Street should have an improved link to Byron Park and the Leisure Centre which should be better integrated to provide a more attractive recreational experience. Headstone Manor and Pinner Park can also be an extension of this link route through the Kodak site.	Improve links to Byron Park and the Leisure Centre. Headstone Manor and Pinner Park can also be an extension of this link route through the Kodak site.	Agreed, the connectivity of the area and the places within it will be considered in the context of developing the Preferred Option and the public realm strategy for the area
16	063	3.7	Para 3.6. I am not sure that Wealdstone is lively. The old red brick buildings are good. The Wealdstone centre and premier banqueting offices provides a huge (negative) break in the street scene.	None	Will note this as a potential weakness in the SWOT analysis for Wealdstone
11	064	3.7	So why so few identified on the map.	So few sites identified on Map 5.1	At this stage, when the preferred option has not been agreed it is considered appropriate to consider only the strategic sites identified through the existing evidence base (SHLAA etc) but this will be expanded through the stage 2 masterplan to consider those additional and smaller sites

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					necessary or important to place making.
12	065	3.8	Land Securities supports paragraph 3.7 of the draft AAP, which confirms that "the scale of sites available for redevelopment in Wealdstone presents a very strong opportunity for major regeneration here." The recognition of the potential for development within Wealdstone, in the context of the contribution it can make to delivering the objectives of the Intensification Area, is welcomed.	None	Support is noted
23	066	3.8	3.3; 3.8. References to Civic Centre. According to Core Strategy extract in Para 2.9, Civic Centre would be relocated "towards end of plan period" i.e. 2026 to Harrow Town Centre. Hence it would no longer be an "unique borough asset or "attractor". Hence to ensure that there is no misunderstanding/ regret, this intention should be much more clearly identified on maps and in the text etc.	When relocated the Civic Centre will not longer be an asset	It is a Borough asset in respect of the services it provides not necessarily the building itself.
4	067	3.9	3.8 The majority of buildings in the important Station Road are dowdy, and this factor needs to be addressed.	The environ of Station Road need to be addressed	Proposals for improvements to the existing environs of the Intensification Area will be spelt out in more detail in the Preferred Option
11	068	3.9	The key characteristics of the area should be retained. There is no justification for tall buildings dominating the majority of other buildings or key assets.	No justification for tall buildings	The appropriateness or otherwise of taller buildings within the Intensification Area will be the subject of detailed urban design analysis in support of the stage 2 masterplan and subject to consultation on the Preferred Option in September
23	069	3.9	Expand "buildings and structures"; "Kodak works and chimney"	Include reference to Kodak works and chimney	Agreed
6	070	3.10	As Harrow is already one of the more densely populated Outer London Boroughs, why has the Council not formally rejected the imposition of as many as 2,500 new homes? Such an increase would place intolerable pressures on services and infrastructure, particularly highways.	Query the provision of an additional 2500 homes in the Intensification Area	Harrow has one of the lowest strategic housing requirements in London. As the capital and economic powerhouse of the country London is expected to grow

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					significantly over the next decade and more, and it is appropriate that Harrow plan for and play its part in accommodating such growth
14	071	3.10	2500 is a huge number for such a small area!! If we want to encourage young professionals we need to build something they would want to live in. Take this estate in beckenham http://www.langleyparkbeckenham.co.uk/ it caters for up and coming young professionals and families and its something that the Kodak site could easily accommodate and would be in keeping with the surrounding area. To build yet more flats would be fatal to the character of Harrow. The reason I moved here was to get away from inner city living and flats. Harrow Weald, Bushey, Hatch End and Pinner thrive because of the quality of housing. Don't kill off Wealdstone and the surrounding area by building more flats its already becoming intimidating as the flats close in on the high street.	Query the provision of an additional 2500 homes in the Intensification Area	This matter has been adequately addressed through consultation on the Core Strategy, which is the appropriate document within which such decision must be made. The AAP is intended to give effect to the Core Strategy and is not a further means by which to have these matters reconsidered.
20	072	3.10	I reject the projection that 2500 homes will be needed to provide accommodation for 5000 additional people. Some of these properties will serve families of at least 3 per household, if not 4. Therefore, I believe 2000 new homes would be sufficient to cater for the additional anticipated rise in population of 5000. Additionally, what account has been made of existing properties with planning permission awaiting completion such as the development at the top of Greenhill Way in Harrow, and have these developments been factored into future housing supply figures? As Harrow is already one of the more densely populated Outer London Boroughs, I question whether the Council has taken into account the additional pressure on services and infrastructure, particularly highways, which additional housing numbers will place on the area. If they have, then they should be aware of what the limit on numbers being able to be accommodated in the areas of Harrow Town Centre and Wealdstone Town Centre should be.	Reject the provision of an additional 2500 homes in the Intensification Area	This matter has been adequately addressed through consultation on the Core Strategy, which is the appropriate document within which such decision must be made. The AAP is intended to give effect to the Core Strategy and is not a further means by which to have these matters reconsidered.
22	073	3.10	Section 3.10 outlines diversity of the borough. However, there is no mention of the potential relationship with 'Friends and Family' visitors from outside UK and potential demand for hotels. In context of Indian population, should be capacity for Banqueting suites for weddings (outside of the 1 venue in Wealdstone).	Need to mention relationship with 'Friends and Family' visitors from outside UK	Agreed, the Council will pick this up in the course of preparing the Preferred Option
23	074	3.10	3.10/11/12 Please update if 2011 Census data available before finalisation	Updating required	Agreed if 2011 Census data at the Borough and

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5	075	3.10	House types and density are discussed throughout the AAP. Paragraph 3.14 goes on to state that "various housing types and density are needed across the Intensification Area to deliver the Core Strategy targets and achieve the required spatial characters and relationships with the existing context". Paragraph 3.10 outlines that "while the Core Strategy and the AAP seek to provide a mix of housing, it is likely that this new housing will attract younger professionals, especially those wishing to locate within a town centre environment". Our review of the housing market in Harrow supports the statement that younger professionals will be attracted to new housing in the town centre. Given this, the proposed residential-led mixed use scheme for the former post office site will comprise flatted units and not dwelling houses. Paragraph 3.10 suggests that a wholly flatted development would be acceptable but this should be made clear in the in the AAP and other DPD's which currently seek a mix of housing on all development sites.	Should be made clear in the in the AAP and other DPD's that wholly flatted development would be acceptable.	ward level are available The Council disagrees that para 3.10 suggests that a wholly flatted development would be acceptable. The AAP makes no judgment on such matters at this stage as the appropriateness of 100% flatted residential schemes will be considered in the context of delivering the agreed Preferred Option
6	077	3.11	The Harrow Observer published the result of a readers' poll on 2 June. This showed that 3 out of every 4 residents do NOT "enjoy living in one of the UK's most ethnically diverse local authorities". What is the Council doing to prevent such diversity increasing further? If nothing, why does it care so little for the wishes of the majority of residents?	Prevent increasing diversity	Outside the scope of the AAP which does not extend to social engineering of the nature sought
14	078	3.11	What about the retired. Why not consider creating a private secure retirement village (not your typical old peoples home) that's 21st century with gyms, pools, cycle routes etc. That could free up some of the 3 bedroom houses that they currently occupy and get the housing market moving	Consider provision for retirement facilities/accommodation	Agreed. The evidence base demonstrates the growth in Harrow's elderly population that will require a range of alternative housing options.
23	079	3.11	This draft AAP does not identify how the :- a) needs of the diversity identified in para 3.11 are met. b) deprivation issues identified in para 3.12 are resolved. Both of these should be tested in each of the 4 options. The draft should also reflect upon the age profile of the existing housing stock in the IA. Is it assumed that it will all still be fit for purpose in 2026? The desirability / opportunity of replacing existing housing stock should be considered. There is no consideration as to the impact of the projected new homes on the existing housing stock.	The desirability / opportunity of replacing existing housing stock should be considered	The intention was to identify and agree the overall approach to be progressed for the Intensification Area, and then through the stage 2 work consider the existing urban form, including buildings in need of protection or renewal crucial to the delivery of objectives, the design

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					and feel of an area.
14	080	3.12	Home owners are drawn to areas where primary schools perform well and crime figures are low.	None	Noted and will add these to the list of strengths
14	081	3.12	Unfortunately Whitefriars School usually finishes bottom of any league tables and people are attracted by good primary school results.	Primary school performance	Outside of the scope of the Area Action Plan
4	082	3.13	3.13 The Housing Study should be made available now, to help consideration of this subject.	Make the housing study available	See the baseline report that was published alongside the AAP Issues and Options and made available on the AAP web pages on the Council's website
12	083	3.13	Paragraph 3.13 of the consultation document confirms that the Council is undertaking a Borough-wide viability appraisal in support of the draft policies in the Core Strategy, the findings of which will be made available to inform options testing within the Intensification Area. This would imply that the study has not yet been published, however paragraph 3.16 refers to certain findings of this study. It is therefore assumed that the viability appraisal will be used to inform the next iteration of the H&WAAP (and to help the Council come to a view on its Preferred Option given that it is now in the public domain and available on the Council's website), although confirmation of this would be welcomed. If this is the case, it is considered that paragraph 3.16 could usefully refer instead to the viability study in the context of the capacity testing referred to in paragraph 3.13. Land Securities is of the view that it is critical for viability considerations to be taken into account and afforded sufficient priority as the specific policies and proposals for sites within the AAP boundary are developed.	Publish the Viability Study	Viability Study is published on the Council's website and was emailed to CB Richard Ellis, who like most local developers were engaged in the preparation of the methodology and in the consideration of the initial findings
12	084	3.15	It is considered that paragraphs 3.15 to 3.20 of the consultation document do not, at present, reflect broader trends (for example those identified in the Borough-wide Employment Land Review), and should be amended to do so.	Amend to reflect current market conditions	The views expressed in the AAP are those of GVA Grimley following their detailed analysis of the property and economic conditions, provided in the supporting baseline report, and are therefore considered valid.
12	085	3.18	Paragraph 3.18 notes that "The industrial development market has some potential based on local small business development..." It is considered that this sentence would benefit from amendment to read "The industrial development	Suggested amendment	Agreed

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			market has the potential to take advantage of the development of small and medium sized enterprises..."		
22	086	3.19	Town centres and High Streets have suffered from retail parks. To counter this, we would welcome the encouragement of large retail, electronics, DIY, and trade operations as mentioned in 3.19.	Welcome the encouragement of large retail, electronics, DIY, and trade operations as mentioned in 3.19.	All major retail development is to be directed to the town centre in the first instance in support of their role and function
12	087	3.20	The explicit recognition within paragraph 3.20 of the consultation document that health, education and community facility jobs will make a meaningful contribution to employment targets is supported. This is in line with Paragraph 4 of PPS4, which recognises that economic development includes, inter alia, public and community uses, and is a welcome recognition that a wide range of land uses can contribute to job creation and growth.	None	Support is noted
11	088	3.21	A new modern transport hub has been previously identified as an essential element of a Metropolitan centre and this must be a priority.	A new modern transport hub must be a priority	It is not considered necessary or practical to assign priority to the delivery of infrastructure as this is dependent on factors such as funding
23	089	3.21	3.21 Add that Harrow & Wealdstone Station requires significant improvement to external environment. Add that improved access to Watford following (potential) rerouting of Metropolitan Line will further increase pressure on Harrow on the Hill station and adversely affect Harrow Town Centre as a retail destination.	Proposed additions	Agreed
8	090	3.21	Underground Paragraph 3.21 states that there is spare capacity on the Underground service in Harrow. This appears to be based on the transport audit (Mouchel, 2010). However this report was careful to point out that the data originated from TfL, and was based on 'crush load' where all seating and standing room was filled. The audit comments that "many people would consider these conditions to be 'over capacity' and an uncomfortable and cramped environment in which to travel. Such conditions may also discourage travel on the tube". Overcrowding will worsen on the Metropolitan Line because the new trains being introduced now have 30% fewer seats while the increased train frequency, promised to ameliorate this, will not happen until at least 2018. Furthermore, the proposed rerouting of the Watford branch of the Metropolitan Line to Watford High St and Watford Junction by 2015/16 will increase commuter traffic significantly, providing easier links to Watford's superior retail and leisure facilities, and network rail connections to people both inside and outside Harrow. Harrow-on-the-Hill station is likely to be particularly affected by this as well as	'Crush capacity' and the under plays the need for upgrading and step free access at Harrow on the Hill Station	TfL are the statutory provider of the tube network and the Council must accept their methodology for determining levels of capacity. The need to upgrade and provide step free access at Harrow on the Hill Station is acknowledged but must be seen in the context of wider infrastructure provision.

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			being subjected to increased pressure from the intensification of central Harrow itself. We are pleased that Para 3.21 acknowledges that this station needs upgrading and step-free access but feel that the importance of this issue is underplayed. It is not included as a separate point in the list of present weaknesses of Harrow (Section 3: Portrait of the Intensification Area), and is out of step with the draft London Plan, in which provision of step free access at stations has recently been emphasised by the EIP Panel (Panel report, pt 1, 2011). We recognise that upgrading of the Underground services in Harrow is largely beyond the control of Harrow Council but the rather superficial way it is dealt with in the AAP does not generate confidence that this issue will be actively pursued with TfL and other funding bodies. The Metropolitan Line seems low on TfL's list of priorities. There is no date for the station upgrade and the line will not be upgraded until 2018, half way through the core strategy period. What will the Council do if/when the deadlines slip?		
11	091	3.22	Comment as that for 3.22	None	Noted
6	092	3.23	Whilst good public transport can reduce car usage at the margins, cars are and will continue to be used for many reasons. If the Council's only reaction to the congested roads is in relation to pedestrian movement,	Need to acknowledge that car use will continue	Agreed but must be seen in the context of promoting a mode shift.
23	093	3.23	Include benefits of Car Clubs, greener vehicles, shuttle/hopper services (using "greener vehicles") within housing areas to rail stations and retail centres.	Include benefits of Car Clubs, greener vehicles, shuttle/hopper services	Agreed, these are key to promote and deliver a mode shift
14	094	3.24	Adding a hire cycle hub in the heart of wealdstone would draw people into the area, they could use the bikes to get to Harrow and/or the new site at kodak	Add hire cycle hub	Agreed that this could be considered further in terms of viability of provision
6	095	3.25	The only reason why there is spare capacity in parking areas is the prohibitive level of charges. If the Council could only realise that it would generate more revenue by encouraging use of car parks	Car parking	The Council is in the process of reviewing its charging regime for public car parks, which will need to have regard to the objectives of the AAP in respect of car parks in the Intensification Area
11	096	3.25	Car parks may be in the wrong place? This needs a separate and integrated study.	Need study on car parking	Agreed, car parking provision serving the town centres will form part of the additional

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					transport study in support of the Preferred Option.
8	097	3.26	Parking Para 3.25 suggests that there is spare parking capacity in Harrow town centre. This seems to be based on a study done in 2003 (Transport Audit, 2010), before the increase in restricted parking zones in surrounding residential areas, and therefore may not present an accurate picture. Regeneration of the town centre is likely to stimulate demand for more parking spaces, both for retail use and for commuters at the station, unless some form of coercion or financial inducement is in place to reduce that demand. The draft London Plan recognises and makes provision for this situation. We therefore urge caution in converting parking spaces to other uses.	Need study on car parking	Agreed, car parking provision serving the town centres will form part of the additional transport study in support of the Preferred Option.
11	098	3.26	From experience in other boroughs, I believe it would be unwise for the Council to accept the assessment of their traffic officers. These people have a propensity to follow their own agendas and this appears to be what has happened here. The network cannot even accommodate the existing level of traffic, never mind that which would be related to growth. If questions were to be asked of people in the streets, their answers would be far more reliable than so-called experts.	Do not accept the assessment of the traffic officers	The Council seeks professional advice and should feel confident to rely on this to make decisions.
12	099	3.26	This is a misconceived assumption. Transport and congestion is appalling in Harrow.	Do not accept the findings of the Transport Audit	This is based on a borough-wide assessment, further traffic modelling will be undertaken as part of the phase 2 materplan work
	100	3.26	Paragraph 3.26 of the draft H&WAAP notes that many transport improvements could be funded by new development. All planning obligations must now meet the requirements of the three statutory tests (including that they should be fairly and reasonably related in scale and kind to the development) and it is considered that these tests introduced via Community Infrastructure Levy Regulation 122 should be referenced here.	Reference the tests for the use of planning obligations	The tests are now statutory and therefore there is no need to repeat them here. In seeking s106 the Council will have regard to the tests
20	101	3.27	Some on-street parking (ie: parking bays in front of small shops along Station Rd) is necessary for traders in local shops in terms of both deliveries and customers.	Some on-street parking is necessary	Agreed, parking will be included in the further traffic modelling to be undertaken as part of the phase 2 materplan work
11	102	3.27	Why is their limited opportunity? Whole sections could be knocked down to provide wider spaces. Landowners could be compensated by the Council.	Query limited opportunity to increase car traffic capacity on Station Road	To increase capacity on Station Road may require significant works including CPO, which has significant financial

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					implications that might not be realistic
23	103	3.29	amend wording - "Station Road and secure, weatherproof additional cycle parking at stations."	Include 'weatherproof' cycling parking	The provision of ,weatherproof, cycle must be seen in the context of the delivery of wider infrastructure requirements as well as proposals for urban realm enhancements
12	104	3.30	Paragraph 3.30 specifically relates to the Kodak site, stating that its redevelopment will provide the opportunity to consider new or improved access to the site from Harrow View and Headstone Drive, as well as improved walking and cycling links to Wealdstone Town Centre and Harrow and Wealdstone station. The Council's aspirations to improve pedestrian and cycle linkages in this way are duly noted.	None	Noted
2	105	3.35	Opportunities are listed under paragraph 3.35 which includes; "Make new links between existing green spaces and new developments to improve access, environmental quality and identity" Green Infrastructure links are welcomed as are the proposed improvements to existing environmental quality, where it relates to "soft landscaping". "Access to the Green Belt and Metropolitan Open Land can be improved by building on the Green Grid network" This opportunity s also welcomed and to be encouraged. In respect of these opportunities and in order to ameliorate issues of deprivation to access to open/green spaces the Council may wish to consider Natural England's ANGST (Accessible Natural Green Space standards), which should be referenced in the Core Strategy for the Borough and a link to this can be included within this document. Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system: No person should live more than 300 metres from their nearest area of natural green-space; There should be at least one accessible 20 hectare site within 2 kilometres; There should be one accessible 100 hectares site within 5 kilometres; There should be one accessible 500 hectares site within 10 kilometres.		Support is noted however the Council does not consider the national ANGST standards to be applicable to the existing urban environment of the Borough and therefore, in the course of preparing the Open spaces audit has sought to come up with more appropriate local standards for both the quantity and quality of provision.
21	106	3.35	Weaknesses Flood risk is a material planning consideration so the following weaknesses should be included: "Part of the area falls within Flood Zones 2, 3a, and 3b."	Weakness is existing flood risk	Agreed

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21	107	3.35	<p>Opportunities Flood risk Reducing flood risk should be included as an opportunity. We suggest the following wording: "Use redevelopment as an opportunity to manage flood risk in a sustainable manner and where possible reduce flood risk. Ensure sustainable drainage systems are used to reduce surface water flood risk and improve water quality." Contaminated land A built point on remediating existing contamination should be included here. We suggest the following wording: Redevelopment of brownfield sites provides an opportunity to improve land and groundwater quality whilst bringing those sites back into beneficial use. This is particularly important in this area as it includes the former Kodak site. Redevelopment of this is an opportunity to remediate the land and bring it back into beneficial use. Biodiversity The built point on and linking green spaces, improved access, environmental quality, and identity could be strengthened by stating that buffer zones to water courses will be provided. We support the Paragraph on the green Grid Network.</p>	<p>Opportunity to ensure redevelopment secures improvements to the management of flood risks</p>	<p>Agreed</p>
20	108	3.35	<p>Re: two of the key opportunities identified in 3.35, Firstly, the opportunity identified as "Enable new development to help support facilities and spaces for young people" should particularly apply to Wealdstone Town Centre, with where applicable, a 'planning change of use' is applied for on properties designated for commercial usage where the market is continuing to be unresponsive to utilising them for commercial activity. Secondly, the opportunity identified as: "Key development sites around the station (and redevelopment of the station itself) offer the opportunity to create better physical, visual and associative connections between Harrow on the Hill and Harrow town centre" - The derelict site of the old post offices and associated empty buildings is obviously in mind here. I suggest this should involve a high standard of architectural and landscape design featuring landmarks requiring public investment as well as public sector-generated design ideas concerned with being a public attraction with an attractive aesthetic. This design may incorporate a central water feature with commercial developments interspersed with community buildings and restaurants. The development may have a central theme to maximise its cultural impact such as "Cultural Quarter", for which particular emphasis may need to be immersed within the ethnic and cultural diversity of the borough.</p>	<p>Spaces for young people</p>	<p>Agreed. AAP will make provision for new public realm and civic space that should be designed to maximise use by all sectors of the community, including youth. This is the same with the provision of community facilities which should be designed to be used by a wide variety of the community. Agreed. AAP will seek to improve the visual and physical connection between the town centre and the Hill.</p>
11	109	3.35	<p>There might be a high occupancy rate but the quality is extremely poor. The so called improvements have no greenery and are sterile. Headstone Manor is hardly a major visitor attraction. The intensification area only has very few unique buildings. Harrow school is not in the intensification area. Dandara are only interested in making money and they thought they could get away with an outrageous tall building. Land securities are interested because Kodak is a massive brown field site so it can have its own identity. Where are the niche</p>	<p>Quality of development Council land ownership Large v small sites</p>	<p>Points are noted but on most the Council disagrees. Greening the urban environment is a key tenant of the AAP through implementation of the Green Grid for</p>

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			<p>shops. They are certainly at the low quality end. Why is the significant Council ownership a strength. A diverse experience- from low quality to even lower quality! St mary's church will no longer be a wayfinding opportunity if tall buildings are allowed. Where are the key buildings and spaces identified in the documents? Redevelopment of key sites is NOT the way to provide the catalyst. A master plan and design guide for the town centres is the way forward. Redevelopment of the smaller sites IS the key. Thousands travel through but how many stop? Why would they there is little to offer. There is an ACTUAL lack of clarity not just perceived. This is because there is no direction or town centre design guide. There will be limited funding available because the returns will be small and therefore the quality will inevitably be poor. Development of the large sites in isolation without a town centre design guide will lead to a spiral of decline. The large sites will suck the life out of the town centres of Harrow and Wealdstone.</p>		<p>public land and through requirements for green infrastructure on private development. Agree there are few unique buildings. Any proposals for a tall building must demonstrate the highest architectural quality or will be refused. Council's ownership of land can be used as a catalyst if development stalls or to provide for uses not being provided on private sites. AAP will include policy to cover windfall development as well as allocated sites but best to concentrate on those site we know are planned to come forward.</p>
23	110	3.35	<p>3.35 Strengths - High retailing occupancy - can the validity of this be demonstrated in 2011 - distinguish between that part of Station Road (in Harrow Town centre) which has been "improved" and the rest which requires significant attention - Re rail stations - include connectivity to Herts, Midlands, North West, North - Re developer interest - for balance re significant developers include Wichford, & Neptune Point developers. Re word to "There is increasing developer interest in the area"</p>	<p>Retail occupancy and the need for further improvements in the town centre environment</p>	<p>Harrow town centre remains buoyant despite the current economic climate with vacancy levels well below that experienced elsewhere. AAP acknowledges more improvements to the public realm of the town centre are required.</p>
4	111	3.35	<p>SWOT is an excellent tool and your lists are comprehensive.</p>	<p>None</p>	<p>Noted</p>
15	112	3.35	<p>We feel that a couple of the 'strengths' require qualification: Strong developer interest is not necessarily a strength, unless the developer is prepared to engage in a genuine way with the community (we are encouraged by the present approach of Land Securities regarding the Kodak site, but have been far from impressed by developer attitudes in some earlier schemes for the Town Centre). Public transport accessibility cannot be said to be good, while there are such</p>	<p>Clarification on strengths</p>	<p>The Council considers that strong developer interest remains a strength, and one desired by many other London boroughs. Not ignoring</p>

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			problems for those with mobility problems and/or young children at Harrow-on-the-Hill.		the quality of the stations, the provision of public transport serving the Intensification Area is excellent and again one that would be desired by many other London boroughs.
16	113	3.35	Harrow: The railway makes a barrier between the hard surfacing of office blocks etc and this should remain the case. The Council should preserve the Open Aspect of the Lowlands area / sites. Lowlands Road: Leave the Office Blocks and hard environment where they stop now: at the station. All the Lowlands Greenery is a great strength and should be preserved. Wealdstone: To enhance the area access from and around the station (into High Street) is imperative.	Hard barriers to town centre	The Council agrees that development should define the boundaries of the Metropolitan town centre and should result in an unapologetic hard edge.
12	114	3.35	The fifth bullet point on page 14 of the consultation document states that one of the perceived strengths of the AAP area is that "there is already strong developer interest in the area, particularly from Land Securities and Dandara." Given the ability for sites to change ownership and particularly having regard to the anticipated length of the AAP Plan period, it is considered inappropriate to identify specific developers either generally or in association with specific sites. For this reason, it is considered sufficient for the fifth bullet point on page 14 to simply refer to strong developer interest on major development sites within the Intensification Area. Pages 14 and 15 of the consultation document include perceived weaknesses of the AAP area. The fourth "weakness" bullet point on page 14 relates to the economy and currently states that "vacant office buildings dominate some areas, especially to the west of Harrow on the Hill station, creating a sense of failure." It is considered that reference should also be made here to limited employer demand in a wider sense, as this is not simply limited to office use within the Borough. Furthermore, vacant office buildings are also not limited to the area to the west of Harrow on the Hill station, and the draft AAP should recognise this. With regard to the opportunities considered to be offered by the land within the proposed Intensification Area (on pages 15 and 16 of the draft H&WAAP), the first bullet point confirms that the redevelopment of key sites dispersed across the area can "reinvigorate and provide a catalyst for regeneration of the whole area if carefully managed". Land Securities supports the explicit recognition of the potential catalytic effects the redevelopment of key sites can have. The eleventh "opportunity" bullet point on page 16 of the consultation document currently reads "Access to the Green Belt and	Do not specify developer by name Office vacancy and demand Catalytic effect Wording re Green Belt and Green Grid	No agreed. These are developers with an interest in sites and we would hope that they would wish to engage the Council and the public in their proposals for these sites and see them through the planning process. Disagreed. The ELR shows a requirement for additional office floorspace over the plan period however, the issue is one of building age and quality as well as vacancy levels which are discouraging investment due to low rents. Agree, regarding rewording to avoid confusion in terms.

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			Metropolitan Open Land can be improved by building on the Green Grid network." It is suggested that the Council may want to reconsider the wording of this statement to avoid any potential confusion, and that reference to "seeking to expand the Green Grid network" might be more appropriate.		
56	115	3.35	Station Road after the Mosques to Tesco's is long overdue for something to be done urgently.	Station Road improvement	Noted and agreed – with form part of the consideration of urban realm enhancements alongside transport improvements for Station Road
57	116	3.35	<p>Re: two of the key opportunities identified in 3.35,</p> <p>Firstly, the opportunity identified as "Enable new development to help support facilities and spaces for young people" should particularly apply to Wealdstone Town Centre, with where applicable, a 'planning change of use' is applied for on properties designated for commercial usage where the market is continuing to be unresponsive to utilising them for commercial activity.</p> <p>Secondly, the opportunity identified as: "Key development sites around the station (and redevelopment of the station itself) offer the opportunity to create better physical, visual and associative connections between Harrow on the Hill and Harrow town centre"</p> <p>- The derelict site of the old post office and associated empty buildings is obviously in mind here. I suggest this should involve a high standard of architectural and landscape design featuring landmarks requiring public investment as well as public sector-generated design ideas concerned with being a public attraction with an attractive aesthetic. This design may incorporate a central water feature with commercial developments interspersed with community buildings and restaurants. The development may have a central theme to maximise it's cultural impact such as "Cultural Quarter", for which particular emphasis may need to immersed within the ethnic and cultural diversity of the borough.</p>	<p>Facilities and spaces for young people should be applied to change of use proposals in Wealdstone town centre.</p> <p>The redevelopment of the former Post Office site in Harrow town centre should involve a high standard of design, with commercial uses and possibly a cultural quarter.</p>	<p>Noted – the Preferred Option will include policies for the change of use of shops in the town centres.</p> <p>Noted – the Preferred option will include objectives for the redevelopment of key sites including the former Post Office.</p>
25	117	4.0	I don't want high rise development in Harrow - it has been proved to be very bad for communities and looks terrible.	No high rise	The appropriateness or otherwise of tall or landmark buildings will be the subject of detailed urban design analysis

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					during stage 2 of the masterplan and will be the subject of consultation on the Preferred Option in September
7	118	4.0	Once a preferred development strategy option has been selected, the Council should seek to develop specific policies to promote a coordinated vision for the energy proposals of developments that will come forward within the Intensification Area. A section on energy should be included within the document, developed from an appropriate evidence base, e.g. an energy strategy for the Intensification Area. This should put forward the strategy to mitigate carbon dioxide emissions arising from new development in the area for the years to come, and the Area Action Plan should set carbon reduction targets in line with draft replacement London Plan policies. Officers acknowledge that the nature of the Intensification Area (with respect heat densities, and scale and dispersal of new development) may not, necessarily, lend itself to the use of decentralised energy networks. However, the evidence base, in conformity with the London Plan, should evaluate the role that the use of decentralised energy could have to supply the energy needs of future development within the Intensification Area, and include the role that the Council owned building could have in this vision by acting as a core load. For the less dense parts of the Intensification Area, it is likely that a combination of low carbon and renewable technologies, at site level, will be the most appropriate response to mitigating carbon dioxide emissions. The Council should, therefore, present energy policies (informed by the evidence base studies) that respond to the different character areas of the Intensification Area.	Specific energy proposals	Agreed. This is the intention of preparing the Preferred Option, which will be the subject of public consultation in September. Further viability work will be undertaken on the feasibility of provision of a community CHP scheme. Specific development control policies will be sought to ensure new development meets carbon reduction standards
26	119	4.0	Despite the acknowledgment of deficiencies in your entertainment and cultural offer mentioned in paras.3.35, 4.6 and 6.64 this issue is not listed in the bullet points on pages 15 and 16 under the Opportunities sub-heading. We noted that your Core Strategy did not contain much guidance (none in fact) for the maintenance of existing cultural venues nor suggestions for future development of your cultural offer in Harrow town centre (no mention in Policy CS2 - Appendix A). As a suggestion, the arts venue in Uxbridge Road could be transferred to a more central site in Harrow but the current site has plenty of space and good parking, something that may not be achievable in the town centre. Paragraph 2.10 lists the objectives of the Intensification Area including to 'increase retail, leisure, and hotel provision within both town centres' and we request this statement be amended to leisure and cultural facilities for consistency to reflect	Maintenance, enhancement and new provision of cultural facilities	Cultural facilities are already identified as a requirement in the town centres at para 4.6

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			para.3.35 (weaknesses bullet point) which states limited range of cultural facilities; para.4.6 which states the provision of new cultural and leisure facilities, and para.6.64 which states improved cultural activities. It will not be possible to rejuvenate Harrow town centre through 'improved cultural, community and evening activities' (para.6.64) unless the AAP provides a steer.		
15	120	4.0	We would like to see some mention of the following: the need for affordable family housing (4.8); problems for cyclists and bus users (as well as pedestrians) caused by the inadequate link westward from Wealdstone (4.18); the need for removal of 'pinch points' in Station Road that currently impede it from providing a safe and attractive route for pedestrians and cyclists (4.24). In addition, there are a couple of places where the text may need improvement: There seems to be something missing from the last sentence of 4.12 (presumably in order to make a distinction between 'desirable' and 'undesirable' journeys); The second sentence of 4.23 would perhaps make more sense if 'a few' were replaced by 'few'	Affordable housing Poor cycling and bus facilities	Overall affordable housing requirements appropriately dealt with on a Borough-wide basis in the Core Strategy. Specific affordable housing and transport/movement requirements to be included in the preferred option.
27	121	4.0	With well established, popular and easily accessible shopping centres at Brent Cross, Watford and Uxbridge, each having a welcoming mix of large and small outlets under one roof, I do not believe that we should attempt to compete. On the other hand we should ensure that residents have good facilities for day to day living. These need to be provided in both Harrow and Wealdstone. Where retail outlets are provided they should form the ground floor of multi-story residential blocks, with an absolute maximum of ground plus eight floors [see below]. The accommodation could be maximised by extending upper floors horizontally to provide shelter over the retail outlet fronts, to be used for pedestrian shelter and, where practicable, external displays or seating. We could, however, provide excellent recreational and leisure facilities which would attract visitors to the town centres where they could enjoy refreshments from the many appropriate establishments already established. We have the Kodak and Windsor & Newton sites which, one hopes, could be developed to provide employment for a reasonable proportion of the many new residents we are being forced to accommodate as well as our existing residents. Building height must be appropriate for the area in which they are to be built. For example, within residential roads comprising two storey family homes, two floors should be the norm with a maximum of three. In a business area a maximum of nine floors (ground plus eight residential) should be the maximum BUT, where they overlook family homes the limit should be three floors and consideration should be given to any effect on Harrow's iconic views.	Harrow town centres offer – mixed use development Building heights	Harrow's Retail Study identifies a need for some retail growth particularly in Harrow town centre to maintain the Borough's market share of expenditure and the Metropolitan Centre status of Harrow. The approach does not seek to increase market share to compete with other large shopping destinations in the region. Details on building heights and forms will be included in the Preferred Option the subject of further public consultation taking into account locally identified important views.
28	122	4.0	PPS12 Paragraph 5.4 states that AAPs should amongst a range of objectives	Historic environment	The appropriateness or

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			<p>protect areas particularly sensitive to change by resolving conflicting objectives in areas subject to development pressure. In addition PPS5, policy HE3.4, states that plans at the local level should consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial vision in the LDF. It continues to states that plans should include consideration of how best to conserve individual, groups or types of heritage assets that are most at risk of loss through neglect, decay or other threats. With these points in mind we have the following comments to make: It is essential that the areas heritage assets are identified, valued and appropriately conserved and used as a catalyst for regeneration (PPS5 paragraph 7). This includes utilising elements of the existing townscape that contribute positively to the character and distinctiveness of Harrow and Wealdstone. The significance of heritage assets outside of the AAP should also be carefully identified, valued and analysed as part of the process of considering the environmental capacity of the area to accommodate growth. For example the unique skyline, landmarks and setting of Harrow on the Hill and its heritage assets should be carefully assessed and appropriately protected, especially when considering specific sites for tall buildings. It is noted that the potential for tall buildings are to be explored as an aid to reinforcing the presence of the Harrow as a Metropolitan Centre (pg21 - Key Issues and Opportunities options). Due to the sensitives of Harrow on the Hill is this approach necessarily the best way of reinforcing the centres status? Opportunities to invest in the historic environment should be actively pursued and identified as an objective of the AAP. This could come in the form of funding raised through S106 agreements, which could be used to help restore and regenerate key heritage assets such as Headstone Manor. Greater clarity should be provided on where tall buildings may be appropriate or not. Specific sites should be identified in the AAP, with details of the parameters of the scale and form of development. This information should then be supported by detailed evidence including analysis of the potential impact of such development upon the significance of heritage assets (as advised in section 2 of the EH/CABE Guidance on Tall Buildings (2007)). It is noted that in paragraphs 4.9-4.10 further detail will be provided at the next stage of the AAP. Our engagement in the development of this detail would be welcomed. Â· In the meantime and at this stage, it is not possible to state a preferred option. The details provided do not appear to have considered sufficiently the impact of the various options upon the historic context, including the areas heritage assets and their significance. For example many of the options discuss the need for tall buildings to deliver the expected targets of housing units and commercial floor space. Consequently it is not clear from the evidence provided whether the impact of tall buildings upon</p>	<p>Building heights</p>	<p>otherwise of tall or landmark buildings will be the subject of detailed urban design analysis during stage 2 of the masterplan and will be the subject of consultation on the Preferred Option in September.</p>

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29	123	4.0	<p>the historic context has been robustly considered.</p> <p>The above document has been produced to guide development within the Harrow and Wealdstone Intensification Area, in line with policy CS2 within the emerging Core Strategy for Harrow Council. The document highlights four main spatial options to deliver the proposed objectives contained within the plan, which envisages growth of approximately 2,500 new homes (with a corresponding population increase of approximately 5,000) and 3,000 new jobs. Sport England does not wish to support one specific spatial option over another, but we do believe there are a number of local and strategic issues that need to be addressed whichever option emerges as the preferred way forward, with regard to the local provision for sport and physical activity in the area: The existing option does not make any specific reference to existing facilities for outdoor sport such as playing fields, multi-use games areas, greens, courts etc. Sport England are a statutory consultee on any planning applications affecting playing fields, therefore we would wish to see a commitment within the next stage of the Plan's preparation which emphasises the need to protect existing outdoor recreational areas, especially given the identified shortfall in public open space identified in the Plan. There will be a policy requirement to provide new areas of public open space (including areas for outdoor sport) to meet the needs of local residents including the proposed additional population envisaged in the Plan. The draft document envisages (Para. 4.7) that the urban form of the area will make it difficult for the plan to deliver new areas of open space to meet these needs; therefore the priority is likely to be qualitative improvements to existing sites. I am not aware of any adopted local Playing Pitch Strategy which identifies priorities for qualitative improvements to such areas; therefore a priority for the Council should be the production of such a document to help identify these priority sites which could benefit from the need for qualitative improvements. With regard to indoor community sports facilities such as sports halls and swimming pools, the document (Para. 4.6) identifies a specific priority - "Harrow Leisure Centre needs upgrading". Sport England have developed a number of strategic planning tools to help quantify demand for and supply of indoor sports facilities in a given area. As an example the Sports Facilities Calculator (SFC) has been developed to quantify the demand generated for these facilities by a given population increase in a particular study area (expressed as a local authority area). I have therefore run this model for a population increase of 5,000 in the Harrow Council area and the results (for sports halls and swimming pools) are shown below: FACILITY TYPE DEMAND GENERATED (by pop. increase of 5,000) PRO-RATA COST Sports Halls 1.46 courts (or 0.37 standard 4 ct hall) £1,060,957 Swimming Pools 51.79m2 (or 0.24 standard 4 lane pool) £666,091</p>	Outdoor sports facilities and open space	Borough-wide requirements for open space and sport are identified in the Core Strategy, based upon existing evidence including an up to date PPG 17 study, and a sport hall and swimming pool assessment carried out in 2008. The model outputs now carried out for the Intensification Area are noted and will inform the preparation of the Preferred Option consultation document.

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29	124	4.0	<p>Total Cost £1,727,048</p> <p>The above table indicates that whilst demand for new community sports facilities in Harrow as a result of a projected population increase of 5,000 does not equate to whole 'units' of provision, there will still be significant local demand that will need to be catered for at existing facilities in the area. Sport England would normally support the broad principle of securing investment to ensure qualitative improvements to existing facilities such as Harrow Leisure Centre that will need to accommodate this additional demand. However, Sport England data using the Facilities Planning Model (FPM) which models supply-demand balance for sports hall use estimates that the sports hall at Harrow Leisure Centre, like many in the London area, is already operating at 100% capacity at peak times, therefore the scope for such a facility to cater for additional demand would appear to be extremely limited. Sport England would therefore advocate that further stages of the Plan's production need to give further thought as to how this increased demand for community indoor sports facilities can be best met with regard to quantitative or qualitative improvements to existing facilities within the catchment area of the Intensification Area. With regard to quantifying and delivering the social infrastructure (including indoor and outdoor sports facilities) required as part of this development area, Sport England has a range of tools and guidance on our website (contained within our 'Planning Contributions Kitbag') which can help local authorities produce documents such as Infrastructure Development Plans. These documents can be accessed via the following link: http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/planning_kitbag.aspx</p>	Sports and Leisure facilities provision and capacity	Noted. Results to be taken into account in the preparation of the Preferred Option document.
18	125	4.0	<p>Need to consider School Places, esp Faith Schools, and if new schools are all academies, provision for SEN places will need to be considered as LEA retains statutory duty.</p>	School places	An infrastructure Delivery Plan for the Borough as a whole has been produced in support of the Core Strategy. The Core Strategy sets out requirements for increased school capacity to be supported through a Community Infrastructure Levy.
31	126	4.0	It is encouraging that there is the focus on creating a Harrow and Wealdstone Intensification Area, and it is anticipated that the significant level of homes and jobs that are proposed will have a hugely beneficial effect on the area and wider Borough. Whilst these targets are ambitious, it is considered that they can be	Wickes House potential development opportunity	Support for Option 4 is noted

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			<p>achieved through the right mechanisms. The AAP provides details of the four development delivery Options that are being considered at the outset of the process of planning for the area through emerging policy. Our client, who has a potential interest in Wickes House on the east site of Station Road, fully supports the objectives of Option 4. As such, this is the preferred approach to development, being the Option which would provide the best mechanism for delivering the overarching objectives of the Intensification Area, and achieving the objectives clearly set out in the AAP and indeed within Policy CS2 of the emerging Core Strategy. Option 4 is therefore supported. The AAP acknowledges the important role that existing sites will play in delivering housing within the areas of principal focus. This acknowledges opportunities for mixed-use developments at higher densities in appropriate locations and buildings should be encouraged. These sentiments are strongly supported in the context of the clear role that our client's potential site at 120-128 Station Road could offer in significantly contributing to meeting the clear objectives of the AAP.</p>		
11	127	4.4	<p>Harrow only has international recognition from the school. Lets not kid ourselves otherwise. It is not a leafy green suburban dormitory. It is a tired multi-racial non entity and probably not highly valued by residents. It is more of a worry in anticipation of further decline.</p>	Poor environmental quality	Area Action Plan seeks to improve the central area. Proposals for other parts of the Borough dealt with in sub area policies of the Core Strategy.
23	128	4.4	<p>In general, the 3 areas are described as they are now. There needs to be commentary as to what these areas may look like (particularly older housing stock) by 2026 if the status quo is maintained and the opportunities that could present. 4.4 In raising the profile of Harrow, whilst its educational fame is frequently identified, the RNOH facility and Bentley Priory (as its museum / educational centre is established in the next few years) should be highlighted. Harrow also has a Crown Court demonstrating its area importance.</p>	Commentary required about the status quo option and its implications	Expression of how the constituent areas will look can be worked-up once the preferred spatial development option has been selected. Noted re: RNOH, Bentley Priory and Crown Court.
32	129	4.4	<p>Raising Harrow's image [para 4.4] should be done selectively, only in support of agreed objectives and plans. Harrow can sometimes benefit from being a well-kept secret.</p>	Raising Harrow's profile	Agreed.
5	130	4.4	<p>The emerging AAP does send some positive messages to landowners such as Dandara who are keen to invest and develop in Harrow in the short term, specifically paragraph 4.4 which states "Harrow needs to embrace change...". The Council will be aware that Dandara have been trying to redevelop the former post office site at College Road since they acquired it in July 2004, both through the promotion of the College Road site within emerging local plan documents and through the submission of planning applications. Whilst it is extremely</p>	Positive statements about change	Noted. The Council hopes to maintain and develop a productive working relationship with all stakeholders including developers.

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			<p>disappointing that the College Road site has been unoccupied since acquisition seven years ago, Dandara are encouraged by statements such as:- "[Recognition that] A history of failed planning applications for key sites and a perceived lack of clarity and commitment from the Council may have damaged future negotiations with developers" (SWOT analysis, pg. 16). "A proactive approach to the future market conditions will be required by the Borough and its partners to attract residential and economic investment and advance social and infrastructure projects" (para. 5.4). Notwithstanding the extensive amount of time and money that has been invested over the past 7 years in trying to deliver development in Harrow by Dandara, our client remains committed to contributing to the delivery of the AAP by continuing to invest in the proposed redevelopment of the College Road site. However, this investment requires in return a proactive approach and a degree of certainty from the Council. It is hoped that the sentiment of the statements made in the AAP will translate into a working relationship between the Council and Dandara which will deliver much needed development on the former post office site in the short term</p>		
2	131	4.5	<p>The consideration of Environmental investment through Green Infrastructure, as mentioned under paragraph 4.5 is welcomed and to be encouraged. Natural England is pleased to see the consideration and reference to Green Infrastructure through the provision of enhancements and increased access to open spaces as part of sustainable development, this should be a key component of all spatial development plans and its inclusion in this document is welcomed. Key Issues and Opportunities for Wealdstone in the development Options, paragraph 4.19 refers to "improved Green Infrastructure across the sub area by making links between existing high quality open spaces.</p>	Green infrastructure	Support noted.
5	132	4.5	<p>Following on from the above section, the AAP suggests various planning benefits which could be delivered through development within the Intensification Area. Whilst it is not overtly clear, the AAP suggests that financial contributions will be sought toward projects such as:- Improvements to Harrow on the Hill station - step free access, more space for interchange and general improvements to the external environment (para. 3.21); Improvements to Harrow Bus Station - lack of space for passenger interchanges and bus parking (para. 3.22); Local improvements to key junctions and corridors (para. 3.26); Public realm improvements - the recent public realm upgrades along Station Road improves the eastern end of College Road but this is to extend right along College Road to include the Station arrival point (para. 4.27). Cycling improvements - provision of additional lanes and priority junctions along Station Road and additional cycle parking at stations, potential north-south route between Harrow and Wealdstone (para. 3.29); Travel planning - area-wide travel</p>	Priorities for delivery of social and physical infrastructure	An infrastructure Delivery Plan for the Borough as a whole has been produced in support of the Core Strategy. The Core Strategy identifies the components of infrastructure to be funded through a Borough-wide Community Infrastructure Levy and additional requirements that will be sought within the Intensification Area.

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			<p>plan framework and dedicated coordinator for the area (para. 3.31). It would be helpful if the Council could set out what the priorities are for delivery. The AAP should include details of specific projects and associated costs. Para 4.5 outlines that the challenge is to secure environmental improvements in advance of, or in parallel with, economic and residential growth, and in a time of public sector fiscal constraint. Monies funding planning benefits are generated from the sale / lease of residential, retail and commercial units and therefore it is not appropriate to suggest that environmental improvements can come before or in parallel with economic and residential growth. This must be acknowledged in policy, planning permissions and legal agreements. A programme associated with the delivery of each project should be aligned with the phasing of development across the Intensification Area. It is suggested that this exercise is undertaken in conjunction with landowners and developers to ensure that the focus is on the sites that can be delivered in the short to medium term. Development should not be restricted in coming forward. This is particularly important given the limited development which has taken place in Harrow town centre in recent years. We would be grateful if the Council could provide clarification on a comment in the SWOT analysis which states that new development can help to increase permeability for local movement across the area with reference being made to footbridges over rail corridors. You will be aware that the appeal proposal made provision for the retro-fitting of a footbridge over the rail corridor although the significant funding gap made it undeliverable in the short to medium term. In reality, it is likely that the funding gaps will be greater than they were at the time of the appeal due to cuts in public fiscal spend. Our recent discussions with officers in relation to proposals for the former post office site is that a footbridge is no longer required although now that it is suggested in the emerging AAP, we would be grateful if formal clarification on this matter was provided by the Council.</p>		<p>Consideration will be given to the need for any further work such as phasing.</p>
11	133	4.6	<p>Where is the vision for these and where are they to be located and how will they be funded?</p>	<p>Vision, location and funding of infrastructure</p>	<p>The overall spatial vision and strategic objectives are set out in the Core Strategy. In addition the Council is preparing an open space strategy and will prepare a replacement cultural strategy.</p>
32	134	4.6	<p>Para 4.6 - yes. Theatre? Also plan for green and pleasant public areas in the IA.</p>	<p>Theatre provision</p>	<p>Noted.</p>
54		4.6	<p>Harrow lacks a purpose built theatre/ concert Hall. If in Wealdstone or Harrow it</p>	<p>Theatre provision</p>	<p>Harrow Core Strategy</p>

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			<p>will enhance night life. Harrow unlike Watford has no Music school. It has been proven that the Arts bring in people and increase prosperity. Leisure facilities should include exercise facilities. Harrow has less swimming areas than it had in the past. Is a new pool planned?</p>		<p>identifies performing arts space as a component of infrastructure to be funded through the Community Infrastructure Levy. The 2008 swimming pool assessment showed no deficiency in pool provision. (However consideration to be given to new evidence provided by Sport England).</p>
11	135	4.7	<p>Forget the large sites, it should be a pre requisite. How will it be achieved elsewhere?</p>	Quality design	<p>Harrow Core Strategy sets out strategic requirements for open space provision.</p>
6	136	4.9	<p>Core Strategy targets may require taller buildings than some which presently</p>	Tall buildings	<p>See below</p>
11	137	4.9	<p>There is no evidence to prove that tall buildings are necessary. They are not wanted. There is a presumption that all targets will have to be delivered by the strategic sites. This is not the case and the intensification area should be looked at as a whole, otherwise why call it an intensification area rather than strategic site proposals. What is the average height of all buildings in the IA? If the all had one extra floor that would probably satisfy the targets!</p>	Tall buildings	<p>The appropriateness or otherwise of tall or landmark buildings will be the subject of detailed urban design analysis during stage 2 of the masterplan and will be the subject of consultation on the Preferred Option in September. This will include consideration of the capacity of development to achieve strategic targets.</p>
10	138	4.9	<p>Having attended some of the forums the general concensus has been against tall buildings particularly within the corridor between Harrow Hill and the Harrow Weald ridge which takes in most of Wealdstone and Harrow town centres. If a more holistic approach to redeveloping Station Road through a much-needed town centre design guide with medium sized buildings of say four to six storeys then the perceived need for tall buildings to achieve the 2,500 new homes is</p>	Tall Buildings	<p>See above</p>

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			obviated. A town centre design guide with height limits would assist developers and owners in redeveloping old and tired buildings along Station Road.		
7	139	4.9	As stated within Harrow Core Strategy policy CS 2, this DPD will seek to identify suitable locations for tall buildings within the Intensification Area. Once a preferred development strategy option has been selected, the Council should undertake further detailed local assessments, to augment character study work already included within the baseline report, and to inform the site selection process. The GLA will work with the Council to ensure that any locations identified would be consistent with the criteria within draft replacement London Plan policy 7.7. In developing the Area Action Plan further, the Council should have regard to draft replacement London Plan Policy 7.7, as well as relevant CABE/English Heritage guidance, in order to establish a robust set of policies for development management purposes which would ensure that any tall building(s) would be delivered in a way that would maximise benefits, and minimises any negative impacts.	Tall Buildings	The appropriateness or otherwise of tall or landmark buildings will be the subject of detailed urban design analysis during stage 2 of the masterplan and will be the subject of consultation on the Preferred Option in September.
8	140	4.9	Tall Buildings - The core strategy stated that the AAP would consider if tall buildings were appropriate for the Intensification Area. This is in line with the draft London Plan which suggested that the decision should be based on a characterisation study to identify desirable elements of the existing architecture and take account of the context such as local heritage sites. However according to Para 4.9, a decision has already been taken on the grounds that tall buildings will be 'required' in order to achieve the housing target for the IA. A characterisation study has been done (not referred to in the AAP), which interprets the policy of the draft London Plan in the context of the IA. It emphasises that the proximity of Harrow Hill makes the town centre a sensitive location for tall buildings. This echoes the submission of CABE to the Dandara appeal: "We think that tall buildings are likely to weaken the strength of the traditional Harrow on the Hill views." In the light of this the AAP needs to justify its decision. There are different forms of housing that still achieve high densities without high rise (CABE/English Heritage: Guidance on tall buildings, 2007). Have these been considered? Alternatively less ambitious housing targets, which match but do not exceed the requirements of the London Plan (see 'Options' below), would reduce the pressure for high rise structures. Â Furthermore the AAP does not define 'tall' either in the text or in the options. During the EIP for the draft London Plan it was noted that the usual threshold of 30m was only appropriate for the central London zone and that it would be much lower in the outer boroughs. The average height of the buildings in the IA must be about 4-5 storeys, so a tall building would be anything higher than that (16 m). Â In housing terms, high rise blocks are less popular, less healthy, less safe	Tall buildings	Para 4.9 states that 'taller' buildings and higher residential densities will be needed. This reflects the fact that some parts of the Area are only two/three storey. Consideration of the appropriateness or otherwise of tall (i.e. 10 storeys+) to be determined as set out above.

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			(in cases of fire or power outage) and use more energy than equivalent low rise housing. Unless optimised in all respects, they tend to give rise to social problems. The mistakes of a previous generation must not be repeated and the risk of this is high when the building is being done on the cheap. It would therefore be useful to restate the national policy that tall buildings must be of the highest architectural merit.		
4	141	4.9	4.9 & 4.10 Taller buildings. Clarification needed with a detailed study showing proposed positioning with their shadows and lines of visibility. Our choice is for a spread of Housing Types, with the majority max. 3 storeys plus minimal high rise of max. 8 storeys as per Type E.	Tall Buildings	Noted. The appropriateness or otherwise of tall or landmark buildings will be the subject of detailed urban design analysis during stage 2 of the masterplan and will be the subject of consultation on the Preferred Option in September.
5	142	4.9	We confirmed in our representations to the emerging Core Strategy (enclosed) that the policy framework for tall, landmark buildings is of vital importance to Dandara particularly in view of the appeal decision dated 22 nd July 2010. Paragraph 4.9 discusses building heights and states that " new development will change the current urban character within the Intensification Area and achieving the Core Strategy targets will require taller buildings and higher residential densities to be woven into the existing urban fabric" . The second last bullet point on page 21 sets out that the development options for Harrow town centre "should explore building forms that are appropriate to its Metropolitan status which may include tall buildings". Paragraph 4.10 goes on to outline that the AAP will subsequently seek to identify suitable locations for taller buildings and that " the future skyline of Harrow will change". However, in view of the appeal decision, it is felt that these statements are unnecessarily ambiguous particularly given that a location has been identified as being suitable for a tall building, i.e. the former post office site. We would reiterate that the Secretary of State, in his decision, confirmed that there was "no objection in principle to tall buildings on the appeal site" with it being established that this was the view of most speaking at the Inquiry. Therefore, the appeal decision has already established that the former post office site is a suitable location for a tall building. This should be explicitly stated within the AAP. Tall buildings should be embraced and viewed positively. Tall buildings will significantly assist in achieving some of the	Tall Buildings	The appropriateness or otherwise of tall or landmark buildings will be the subject of detailed urban design analysis during stage 2 of the masterplan and will be the subject of consultation on the Preferred Option in September. The appeal decision on the former Post Office site can inform this work.

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			overall objectives of the AAP, not only in respect of quantum of development but by creating a gateway to Harrow town centre, enforcing its status as a Metropolitan Centre, visual enhancements and associated planning benefits. This should be reflected in all relevant policy and guidance.		
16	143	4.9	Building Heights: There should still be a restriction. Also, "Tall Buildings" need space around them and a proper setting. Wealdstone: Has much more potential for economic growth including - The Civic Centre and the Economic Area at the bottom of Rosslyn Crescent (Adjacent to the railway line). Potential for expanding / intensification of activity here.	Tall Buildings	Agree. To be considered as part of detailed masterplanning work.
33	144	4.9	Paragraph 4.9 of the AAP consultation document says that 'New development will change the current urban character within the Intensification Area [and] achieving the Core Strategy targets will require taller buildings and higher residential densities to be woven into the existing urban fabric'. We welcome the recognition that taller buildings and higher residential densities will be required in future Harrow developments. Using land efficiently and ensuring new buildings respect their wider context are two central tenets of national planning policy	Tall Buildings	Para 4.9 states that 'taller' buildings and higher residential densities will be needed. This reflects the fact that some parts of the Area are only two/three storey. Consideration of the appropriateness or otherwise of tall (i.e. 10 storeys+) to be determined as set out above.
54	145	4.9	The Inspectorate of Bristol living out of London do not have the feel of local residents. It is to be hoped that the new Bill about Localism will rectify this. Despite opposition to robbing people of their view of the Hill, it continues. There is talk of Primrose Hill, Grimsdyke and Bentley Priory Views but Harrow is ignored. Time after time residents have asked for their Hill View to be saved from destruction to no avail. Is the loss of the hill view irreconcilable with the increase of population? Is there no way out? Are Planners unable to solve this? Big Tower blocks are not beautiful? If the people of Harrow wanted to live in High Rise City they would not be living here.	Local protected views	The urban analysis work to inform tall building policy in the Preferred Option document will include consideration of the setting of Harrow Hill and identified, locally important views.
11	146	4.10	We have not yet established that tall buildings are necessary. They are certainly not wanted. Why is this seen as a fait accompli? There should be no building taller than the current highest in the borough. The vale between the landmark of St. Mary's and the Harrow Weald ridge should remain uncluttered with tall buildings. This will preserve the views to and from these important assets of the Borough.	Tall buildings	As above.
5	147	4.11	The topic based issues and challenges facing the Intensification Area are set out within paragraphs 4.4 to 4.12 of the consultation document. Land Securities	Economic growth issues	Support noted.

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			strongly supports the analysis of the key economic growth issues facing the area as set out within paragraph 4.11.		
54	148	4.12	A Harrow Ring Road would help traffic congestion and can be planned. Station Road's traffic cannot all be diverted down congested harrow View/ Headstone Road. The road will become a place where no one wants to live and will become run down.	Traffic congestion	Sustainable solutions to traffic management and congestion will be sought.
6	149	4.12	Whilst the Council can probably change travel habits to a limited extent, no reliance should be placed on this. Residents will continue to use cars regardless of the state of public transport. The Council's first duty is to act on behalf of the residents, by addressing the problems of congestion and parking. Pursuing policies that will exacerbate the problems, in the name of worthy but impractical objectives, is unacceptable.	Traffic congestion and parking	As above. Parking policies will need to conform with the London Plan and contribute to the objectives for the Intensification Area as set out in the Core Strategy.
11	150	4.12	This is incredibly important yet we have seen no studies on the issue.	Traffic congestion and parking	A Transport study for the Borough as a whole was carried out 2008 and updated 2010.
7	151	4.12	TfL would expect any preferred option to be supported by an assessment of its impact on public transport services and highway capacity, and this should be outlined in the final document. Such an assessment should consider the likely cumulative impact of sites within the Intensification Area, the implications of future growth elsewhere in the borough, and the growth assumed in the London Plan. TfL strongly advises the Council to make use of its sub-regional strategic transport models in developing the necessary evidence base for the level of growth proposed in the preferred option. This should inform a package of intervention/mitigation measures to support intensification, seeking particularly to address existing issues of local highway congestion at peak hours, rationalise bus operations, and provide better access and facilities at Harrow on the Hill and Harrow and Wealdstone stations. As part of this, and in line with draft London Plan policy 6.13, a restraint based approach should be taken to car parking, considering the area's good level of public transport accessibility, and the sensitivity of local roads to increased traffic. Promotion of walking, cycling, electric vehicles and an innovative approach to travel planning would also be strongly supported by TfL.	Transport capacity assessment	The strategic objectives and targets for the Intensification Area are set out in the Core Strategy, the preparation of which was informed by a Transport Study (see above). The need to conform with London Plan parking standards is recognised.
7	152	4.12	To ensure a holistic approach to development and the provision of transport infrastructure in Harrow and Wealdstone, TfL strongly recommends that a transport study is prepared, and that this work is developed and conclusions drawn prior to making planning decisions on site specific proposals within the Intensification Area boundary. A mechanism for securing financial contributions	Transport impact assessment	Agreed, the Council has already begun to engage with TfL over the use of their transport model for this purpose and for the

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			towards transport infrastructure would also be welcomed.		validation of the findings
34	153	4.12	I would like to suggest the construction of a slip road from Ellen Web drive to the High Street. 1. This would reduce traffic congestion by allowing an alternative route travelling from east to west. At certain times of the day existing roads can become blocked due to congestion at Harrow Wealdstone station traffic lights. The proposed slip road would provide an alternative route for East West traffic through the Oxford Road industrial estate avoiding residential roads. 2. Wealdstone would benefit from extra trade passing through the High Street. 3. Ellen Webb Drive and Masons Avenue are main pedestrian routes. Masons Avenue is a main route for pedestrians travelling from the Wealdstone public transport hub to the leisure centre, Elmgrove School and factories. Ellen Webb drive is also a pedestrian route. It is used by commuters travelling to and from the station. The proposed change will make walking along these busy pedestrian routes a safer and more pleasant experience	Slip road proposal for Ellen Webb Drive	To be considered as part of the masterplanning work in preparation of the Preferred Option. However priority will be given to sustainable solutions to congestion.
35	154	4.12	In my opinion, when considering the development of area 5 in the map 5.10, it is important to take this one off opportunity to re-connect the high street to Ellen Webb Drive.	Slip road proposal for Ellen Webb Drive	Noted and as above.
36	155	4.12	- Section 4.12 My husband and I feel that with a minimal amount of work it should be possible for the high street and Ellen Webb Drive to be connected, which will help ease the congestion and help reduce the surrounding roads becoming blocked. this is sim	Slip road proposal for Ellen Webb Drive	Noted and as above.
37	156	4.12	I would like to suggest the construction of a short slip road by cutting through the bank in Ellen Web drive and connecting along an unused existing road to the high street. This simple road improvement would bring the following benefits; 1. Traffic congestion would be reduced 2. Road safety would be increased 3. Wealdstone traders would benefit from passing trade through the high street I hope you will consider the factors I have highlighted in coming to your decision	Slip road proposal for Ellen Webb Drive	Noted and as above.
38	157	4.12	Section 4.12 I would like to suggest the construction of a short slip road by cutting through the bank in Ellen Web drive and connecting along an unused existing road to the High Street. This simple action would bring the following benefits. 1. Traffic congestion would be reduced in pedestrian areas and road safety improved. 2. Wealdstone traders would benefit from passing trade through the High Street. 3. Harrow Council would be able to increase parking revenue.	Slip road proposal for Ellen Webb Drive	Noted and as above.
39	158	4.12	Section 4.12 I would like to suggest the construction of a slip road a few meters from Ellen Web drive to the existing road next to the derelict pub in Wealdstone High Street. It makes sense to allow an alternative route past the bottle neck of Harrow Wealdstone Station. Road safety is also currently an issue for pedestrians crossing from the high street to the station on a blind corner.	Slip road proposal for Ellen Webb Drive	Noted and as above.
12	159	4.13	Paragraph 4.13 of the draft H&WAAP refers to the three main sub-areas of the	Map of sub areas	Noted. Greater

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			Intensification Area textually. It is considered that the draft AAP would benefit from the inclusion of a map here to illustrate the geographical extent of the sub-areas.		geographical expression of constituent areas to be set out in the Preferred option.
23	160	4.14	4.14 Understates the deteriorating state of the uninviting retail offer and ageing built form which needs a significant improvement. Reflect more explicitly the necessity to enhance in the Key Issues. Another issue is how to achieve many of the improvements in the light of the demographic and changing ethnic mix.	Poor state of retail offer	Para 4.14 properly reflects the fact that Wealdstone's retail offer is very local and distinct, eg the 'In Shops' market. Changes to built form to be considered as part of the masterplanning work in preparation of the Preferred Option.
16	161	4.14	Wealdstone: Did start off as a 'village' and somehow has managed to cling on but again the impact of development needs to be watched. Various blocks of flats now in place do not add much to the attraction. Those along George Gange Way - fairly high-rise - are one thing: the block fitted in adjacent to the Byron Recreation Ground is another. It can be seen above the nearby smaller properties: which is not terribly harmonious. Future prospects: It is interesting to note the number of small individual restaurants now in situ at the Western end of the blocked-off Headstone Drive parade. These add to the vitality there and show what can be done - useful for the economy. The large old pub site next to the Police Station presents an opportunity, but care is needed with design etc of proposals. Sad to see Herga Music (long a staple of the High Street) closed. I think Headstone Drive should be re-opened at the junction with the High Street: much more should be made of the 'old' architecture here (the red-brick 3-storey Victorian properties are briefly mentioned) and the 2 Churches actually on the High Street itself. These are imposing buildings but look a bit 'down' at the moment! Rosslyn Crescent: The site at the bottom adjacent to the railway is important economically. Gateway to the High Street: The property on the hill across from the Station presents a likely opportunity for improvement probably within the life of the Plan, but care is needed in re any proposals coming forward for this (again, Design and Height = major factors). Hard Environment : I am worried about the impact of some developments. This can be negative to pedestrians. On the Form I have referred to the Wealdstone Centre and Premier House in that High Street: the scale is such that they seem out of place and overwhelming. The aspect of these buildings is also very important. The entrances to Premier House are on the side of the building and at the rear!! And	Wealdstone urban environment	The need to improve the design standard and respect existing good buildings in Wealdstone is noted; to be considered in the formulation of relevant draft policies in the Preferred Option, for consultation.

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			the latter is tucked away in more concrete - opposite the Peel House multi-storey and off a double-yellow-lined road. Not welcoming!! Design aspects that need to be heeded in future? The hard-surfacing that faces you on coming out of the station into the High Street does not help either.		
23	162	4.15	4.15 Whilst the Magistrate Court will be closed (identify in AAP) and maybe impact on local solicitors / premises, explore the opportunity from the proximity of the Crown Court to establish a new facility servicing the needs of the Crown Court	Support facilities for the Crown Court	Agree – explore through masterplanning work and include as appropriate in the Preferred Option.
12	163	4.15	Paragraph 4.15 of the consultation document, and the first bullet point under the heading "Key issues and opportunities for Wealdstone in the development options" on page 19 emphasise the key role Wealdstone can play in the context of Harrow's employment needs. It is considered that reference to employment generation in its widest sense is the most appropriate, given the guidance in PPS4 that requires policies to be flexible enough to respond to allow a quick response to changes in economic circumstances, and encourages the facilitation of a broad range of economic development, including mixed use.	Wealdstone's potential employment contribution	Agree. Identify broad PPS 4-compliant definition of economic development in the glossary of the Preferred Option document and reflect in any relevant draft policies.
22	164	4.16	Para 4.16: paragraph needs updating. Through traffic is now allowed travelling north through the high street.	Traffic management in Wealdstone – correction	Noted – amend as necessary.
21	165	4.19	The point here on flood risk does not reflect local and national policy as it seems to suggest that all development can be realised subject to flood management works. We suggest you amend the wording to: "Maximise opportunities to reduce flood risk as part of development and regeneration opportunities, avoiding areas at flood risk where possible and if necessary ensuring that development is appropriate to the flood zone it is in." We support the reference to improving green infrastructure.	Flood risk	Agree. Amended provisions to be included in the Preferred Option document for further consultation.
22	166	4.19	4.14 - 4.19 Wealdstone suffers from a perception of high crime rates, and high levels of Anti Social behaviour, which can threaten investment. Development proposals need to be consistent with designing out crime, particularly "runs" allowing exit behind shops by offenders.	Crime in Wealdstone	Noted. To be reflected in any relevant draft policies.
23	167	4.21	4.21. Many of the aged buildings along Station Road detract from the visual appeal. This could present an opportunity for attractive mixed use redevelopment in conjunction with road and other public realm improvements.	Building age and redevelopment opportunities	Agree – consider as part of masterplanning work and include if appropriate in Preferred Option. Note however the main issue likely to be multiplicity of ownership and the possible need for compulsory purchase to

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					realise this.
11	168	4.24	Why not be more radical? Modest but effective interventions sounds like there is a reluctance to spend money on this key issue.	More radical interventions	Noted, but specific proposals to be included need to be realistic and deliverable.
8	169	4.24	Congestion in Station Road and surrounding roads is already a serious problem and will increase with intensification unless some means of reducing the number of cars in use can be found. The measures outlined in Para 4.24 will have very little impact and the reference to 'less traffic-intensive uses' of some redeveloped sites in the road (Para 3.28) has to be balanced against the potentially more traffic-intensive use of the Mosque and an expanded Tesco store (Transport Audit, 2010). It also ignores the through traffic and the potential exacerbation of bottlenecks at the railway bridges and beyond. There are no alternative north-south routes. Harrow view is already heavily congested and will become more so with development of the Kodak site. For these reasons it seems most unwise to leave analysis of the impact of intensification on traffic congestion until after the choice of option has been made (Para 3.32). The scale of the problem and the funding required to solve it could influence the option chosen.	Traffic congestion	The strategic objectives and targets for the Intensification Area are set out in the Core Strategy, the preparation of which was informed by the Harrow Transport Study. Station Road will continue to be a major London distributor road through the Borough and is likely to continue to carry heavy volumes of traffic. Consideration will be given to transport implications in the selection and development of the Preferred Option. Further transport modelling will be undertaken to understand the local impact and potential site and wide mitigation measures
16	170	4.25	Harrow Town Centre: There is a similar problem here, with a huge amount of space that is not aesthetically pleasing. In St Anns the Servicing space and the Entrance/exit of Car Park at the West End of the road are off-putting to pedestrians. Ideally such should be hidden but if the area from King's House along to Junction Road comes up as a potential site in the life of the Plan - this could give the opportunity to enhance the whole area. EMK 2 of 2 Greenhill Way: The rear aspect of the buildings (necessary for servicing) does not offer a pleasant prospect to entice motorists to visit: it does offer a huge opportunity for	Harrow town centre environment Building heights Public realm at junction of Lyon, St. John's and Station	Noted – consider as part of the on-going masterplanning work to prepare the Preferred Option for consultation.

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			<p>the graffiti exponents to show their talents!! Design aspects again to heed for future developments. Tall Buildings: I think - in ?1981 the original Action Area Plan proposed that tall buildings should be restricted to the Town Centre with height limits of 6/7 storeys - to protect (views of) the Hill etc. Some subsequently erected exceed this limit and in my view indicate it was a sensible proposal, but it was overtaken by appeal decisions. I think there should still be a height restriction here: possibly 10 storeys maximum (though I am aware of the 'Dandara' appeal effect). Such huge buildings require a proper setting. Putting them altogether in a close space is not good. The part-built edifice on Bradstowe House site allied to St George's allied to Queen's House leaving small cul-de-sac roads illustrate this. Overall, not a terribly good Environment for pedestrians: it can be quite overwhelming. Strategy: The 1997* study by Hillier Parker commissioned by Harrow on part of the Town Centre (re conversion of the then Davy House now Platinum House) and the Post Office site indicated that office space in Harrow was wanted (on the one hand) but on the other - potential clients saw 'Access' (to the centre) as a problem. That still applies today - 14 years on: the difficulties of going round the one-way system (and of getting out at busy shopping times) illustrate this. The Lyon Road site - the proposals that Wichford have now brought forward for this site are interesting. They seem to think a piazza opposite Debenhams will give them the link to the rest of the Centre and visibility they need. The 1997 study* referred to the need for an entry to Station Road (leading on to College Road etc) as a necessity for success of a commercial scheme for Davy House. Will the link through the bottom of St John's Road be enough for this current scheme - or will Wichford find another access through to but further along Station Road becomes a necessity? If so there are the 2 pedestrian alleyways adjacent to the old Harrow Observer property and to the 'Fat Controller' that has long been empty which possibly could provide opportunities. Now that the 2 large buildings on the Lyon Road site have been stripped out their shells are very visible from College Road, so it probably could take slightly higher buildings than these. Certain other refurbishment going on in the road shows increased activity - which may have a knock-on effect on this part of Station Road itself: possibly beyond the life of the Plan? Transport and Access: In Harrow Town Centre 'disabled access' to Harrow on the Hill station, reconfiguration of the Bus station and sorting out the traffic bottlenecks are all priorities to enable successful enhancement. Enough said. And . Station Road: (from Tesco along through Wealdstone) is all one-lane only: largely as a result of (previous) policy to discourage car use? This only adds to congestion. In parallel with Headstone Road/Harrow View it is a major through route: so there is a need to keep traffic moving. 'Access' in all its forms again: some conflict of thinking</p>	<p>roads</p> <p>Station improvements</p>	<p>The urban analysis work to inform tall building policy in the Preferred Option document will include consideration of the setting of Harrow Hill and identified, locally important views.</p> <p>The need for accessibility and capacity improvements at the Harrow town centre stations is identified in the Core Strategy.</p> <p>Noted and agree re: need for access. Station Road is likely to remain a major London distributor road through the Borough and heavily trafficked. Sustainable traffic management solutions to congestion likely to be most appropriate,</p>

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			indicates a need to sort priorities. If it is necessary to bring people to Harrow they must be able to get here easily, to move around and get out again. I think this theme applies in many places. Happy to discuss further.		consistent with objectives for the Area.
5	171	4.27	Paragraph 4.27 of the AAP deals specifically with the College Road site and sets out the Council's view that "the large development of the old post office remains unoccupied, making a negative impression on the place overall". Dandara wholeheartedly agree with this statement and they are keen to address this through the redevelopment of the College Road site to provide a high quality residential-led mixed use development which contributes to Harrow Town Centre.	51 College Road	Support noted.
11	172	4.28	A metropolitan town centre is not defined by the height of the buildings. This is completely spurious. In fact the only way to create a proper town centre is to have an integrated, human scale, joined up ,harmonious town centre which probably has no tall buildings dominating the majority of buildings in the centre which are currently two or three stories particularly along Station Rd.	Building heights	The AAP states that building forms appropriate to the Metropolitan Centre will be sought which <u>may</u> include buildings. The urban analysis work to inform tall building policy in the Preferred Option document will include consideration of the setting of Harrow Hill and identified, locally important views.
33	173	4.28	Paragraph 4.28 concerns the urgency to address the amount of vacant office space in Harrow and the lack of investment in existing office buildings. This may be addressed by reducing the supply through redevelopment and / or change of use. Redeveloping Lyon House and Equitable House to provide new office and retail space will potentially have wider regeneration benefits but will only be successful if there is sufficient demand for offices in the town centre.	Office vacancy levels and office demand	The AAP reflects the Core Strategy provisions, underpinned by the Harrow Employment Land Study. This indicates localised demand for modern flexible space in Harrow town centre.
22	174	5.0	Do the options for housing need to consider density in town centre and relationship with development of Harrow Rec ? Also consider density and % social housing in relation to Hills report, >concentration social housing, > levels of Worklessness.	Housing densities Affordable housing	Harrow recreation ground forms one component of the network of green infrastructure serving the town centre. Density will be informed by urban

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					form in pursuit of strategic targets of the Intensification Area. Affordable housing addressed in the Core Strategy as a Borough-wide matter.
7	175	5.0	No specific comments	None	Noted
32	176	5.0	my order of preference for the spacial development strategy options is 1 One Centre [option 1] 2 High roads and Centres [option 4] 3 Two Centre [option 3]	Spatial development strategy option	Support for Option 1 is noted
40	177	5.0	This e mail is a response to the consultation regarding the Harrow and Wealdstone proposed intensification area. We live in Torver Road, Harrow, backing Station Road and the Civic Centre. We are unhappy with all of the proposed options as: 1.The area is too urban (it used to be a suburb, but now resembles more an inner city area); 2. The additional housing is, with the exception of option 2, too high rise and ill-fitting with the existing, pleasant, 1930s housing; 3. There is insufficient green space planned for the increase in population; 4. The existing infrastructure could not cope (schools, GP practices etc) and this is not discussed in the document; 5.Some of the assumptions may be untenable (eg using land currently occupied by the Civic Centre and Tesco). Of all the options, option 4 seems the least bad, but we would prefer to see this development sited in less over-crowded parts of the borough.	Spatial development strategy option	Support for Option 4 (albeit as 'least worst') noted. Strategic objectives & targets for the Intensification Area, and infrastructure matters, already dealt with in the Core Strategy. The deliverability of sites will inform site allocations to be included in the AAP.
19	178	5.0	Consultation again. Harrow already exceeds its housing requirements set down by the Government. Why is this trend continuing.	Housing completions	The housing target set out in the Core Strategy is for the next 15 years and takes into account previous years' delivery.
17	179	5.1	Should only be factory sites	Previously developed land	In accordance with national policy and the London Plan all suitable previously developed sites, not just factory sites, considered.
12	180	5.4	The Council's recognition, within paragraph 5.4 of the consultation document, that it and its partners will need to adopt a proactive approach to future market conditions (to attract residential and economic investment and advance social and physical infrastructure projects) is welcomed. The draft AAP can set the policy framework, but in order to deliver the projects and the vision within it, a committed and proactive attitude will be critical.	Proactive approach required	Support noted.

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11	181	5.5	The assumptions assume that the targets can only be delivered across the identified strategic sites. This is not correct All the intensification area is up for grabs.	Development distribution	Agree. The purpose of assessing strategic sites is to identify those key to delivering the minimum strategic targets for the Area. This does not preclude the appropriate redevelopment of other previously developed sites.
23	182	5.5	Not expert enough to form an independent opinion of the metrics. However, qualitative considerations seem reasonable.	Development distribution	Noted.
4	183	5.5	Do not know as without as without consultants input impossible to comment positively.	Development distribution	Published assumptions intended to provide transparency.
42	184	5.5	<p>Taylor Wimpey (TW) is broadly in favour of the principles and aims of the Harrow and Wealdstone Area Action Plan. TW support the target of 2,500 new homes and the provision of a mix of housing units. It is our opinion that work should be implemented at the earliest opportunity on an active economic development strategy, inward investment programme and improvements to the town centres and public realm in order to kick start the regeneration of the Intensification Area.</p> <p>The Council should ensure that employment is constructed in the right areas of the Intensification Area and not preclude existing employment sites from residential development if other more suitable employment areas are available. The Intensification Area should have carefully considered car parking requirements with a reduction in requirements especially around existing transport hubs to encourage sustainable modes of transport such as rail, tube, bus and walking. Car parking capacity should be maintained for larger family units. The Council should also consider the early release of sites in order to kick start the regeneration of the area and support and fund the above projects. The Council must consider providing their land at reduced capital values if they want to achieve all their goals in terms of affordable housing provision, developer contributions to assist in wider regeneration projects and sustainability provisions. Alternatively the Council must adopt a flexible approach to requirements to encourage development. This would be aided if the Council were to prioritise their goals for the regeneration area in terms of land values, affordable housing provision, sustainability and developer contributions as these all affect the deliverability of sites. Taylor Wimpey believe that if the Council were willing to accept reductions in requirements on some of these elements in</p>	<p>Employment locations</p> <p>Parking</p> <p>Phasing of sites</p> <p>Release of Council land</p> <p>Encourage development through reduced requirements</p> <p>Densities too high</p>	<p>Support noted. A local Economic Assessment is already being prepared by the Council.</p> <p>The need to maintain an adequate amount of suitable employment land and release of surplus sites will inform site allocations in the Preferred Option, consistent with the economic and housing objectives for the Area.</p> <p>Car parking will be consistent with London Plan standards and applied to deliver sustainability objectives for the Area.</p> <p>The Council will consider</p>

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			<p>the short term, such as a reduction in affordable housing provision, the long term benefits would far outweigh this short term reduction. A short term reduction would encourage development and regeneration in the area, bringing additional finances into the area creating further regeneration and additional Central Government funding in terms of New Homes Bonus which could be used to fund all of the Councils regeneration aims. Taylor Wimpey would support the use of land assembly powers in bringing forward stalling sites. However the Council must adopt a flexible approach to requirements in order to bring developments forward and stop them stalling in the first place. Taylor Wimpey believe that the 180 - 220 dwellings per hectare density target across the Intensification Area is too high and does not allow for the construction of enough family housing and could result in a disproportionately high provisional of high rise flatted developments. Taylor Wimpey is of the opinion that a larger proportion of the Intensification Area should provide for family housing; especially on the larger development sites with densities of 70-100 dwellings per hectare. High rise flatted developments should be focussed around transport hubs with limited car parking to encourage sustainable transport uses.</p>		<p>the objectives of the Intensification Area and the AAP in the disposal of its land assets. General affordable housing requirements are established on a Borough-wide basis in the Core Strategy.</p> <p>Support for land assembly noted.</p> <p>Appropriate densities will need to be informed by the London Plan matrix, to achieve efficient use of land in this accessible location.</p>
5	185	5.5	<p>Paragraph 3.23 notes the high public transport accessibility of Harrow town centre which makes it an ideal place for dense mixed-use development with sustainable transport modes. The College Road site is located within the town centre and benefits from a high public transport accessibility level of 6a. This, coupled with the appeal decision which established that the height and density of the appeal proposal was acceptable, confirms the former post office site is in a location which will achieve more than 400 units per hectare as per paragraph 5.5 of the emerging AAP. We therefore consider it appropriate that the former post office site is specifically named in paragraph 5.5 as an example of a location that can support densities in excess of 400 units per hectare.</p>	Housing densities	<p>Noted; consider in the formulation of site allocations to be included in the Preferred Option document.</p>
16	186	5.5	<p>I query the assumptions. Agree need to maximise industrial employment / small businesses. How accurate are they re Office use in harrow Town Centre - given present vacancy levels and continuing withdrawal. 2) Development Viability - in essence agreed. 3) Sites - agreed - several large sites must lead the way. I note the significant number of Infill sites and hope that these will not be built out to infinity.</p>	Office demand	<p>Modest Harrow town centre office growth, to provide modern flexible premises for the local market and replace large redundant stock, supported by the Harrow Employment Land Study. Support re: development</p>

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					viability noted. Large strategic sites identified to deliver objectives and minimum targets for the Area. Appropriate redevelopment of other sites supported.
12	187	5.5	Paragraph 5.5 of the H&WAAP sets out the assumptions applied when establishing the proposed options. It is noted that the industrial land density is stated as 150 jobs per hectare. This is somewhat higher than the URS/DTZ 2010 Industrial Baseline report for the GLA which states that typical densities for industrial land are 56-107 jobs per hectare. This has the effect of underestimating the amount of land required for a given level of employment. The third bullet point under paragraph 5.5 sets out a job density for office space of one job per 15 sq m. It is considered that this may represent a slight underestimation, on the basis that recent guidance estimates 10 sq m or 12 sq m per job rather than 15 sq m. Conversely, the job density for leisure and entertainment within the fourth bullet under paragraph 5.5 of the draft H&WAAP could be overestimated. The latest Homes and Communities Agency guidance suggests 65-90 sq m per job rather than 20 sq m.	Job densities	Noted. Reconsider job density assumptions in preparation of the Preferred Option document and site allocations.
56	188	5.5	In building so many homes, schools would need to be expanded plus car use would also increase, can the area take all this.	Carrying capacity of the area	Infrastructure requirements set out in the Borough-wide Infrastructure Delivery Plan and Core Strategy.
5	189	5.6	It is noted from the AAP that a borough-wide Development Viability Assessment (DVA) was carried out at the end of 2010 in support of the emerging Harrow Core Strategy. Paragraph 5.6 of the AAP outlines that the DVA demonstrates that, even under weak market conditions, residential schemes that provide 30% - 40% affordable housing can also support a modest level of developer contribution while remaining viable. The DVA does not appear to be publicly available so we are unable to comment in detail on the assumptions made. Moreover, it is not clear what is meant by 'modest'. Nevertheless, we are of the opinion that emerging policy should allow for greater flexibility. To enable the delivery of the AAP, it is imperative that emerging affordable housing policies should allow some sites to come forward without making provision for affordable housing. It is our understanding that there affordable housing requirement in Harrow is predominantly for larger family homes instead of flatted properties.	Development viability assessment and affordable housing	The Viability Assessment is available on the Council's website as part of the LDF evidence base. Policy requirements relating to infrastructure delivery, including the preparation of a Harrow Community Infrastructure Levy and planning obligation requirements,

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			<p>The College Road site is a tightly constrained site in Harrow Town Centre where the residential element of the proposal will comprise flatted units in order to maximise the potential of the site and to provide for the identified need amongst younger professionals. With this being the case, it is suggested that any proposal would be better placed to contribute / deliver various other planning benefits such as improvements to Station Road, a library, civic amenity, etc as opposed to delivering affordable housing in a form which does not meet demand. This notion appears to be supported by officers but should be reflected in emerging policy documents. Notwithstanding this, the AAP should provide flexibility across the Intensification Area with regards to affordable housing provision in order to realise the wider objectives for the area.</p>		<p>are set out in the Core Strategy. This allows for development viability to be assessed in individual cases.</p> <p>The requirements for affordable housing are also set out on a Borough-wide basis in the Core Strategy.</p>
12	190	5.6	<p>Paragraph 5.6 of the consultation document relates to development viability considerations. Land Securities welcomes the recognition that there are a significant number of variables that can influence residual land values, and that in later iterations of the AAP more detailed consideration will need to be had to seeking to strike an acceptable "balance" between attracting development investment; maximising affordable housing; and levels of developer contributions. In this way, as well as more detailed consideration, it is considered that sufficient flexibility will also be necessary (to, amongst other things, have regard to site-specific circumstances), and that this should be reflected within the text of the AAP. Furthermore, paragraph 5.6 of the draft H&WAAP should explicitly recognise commercial viability, which will be a key consideration in the formulation of emerging AAP policies and proposals, in the context of deliverability. Paragraph 5.6 specifically notes that "Importantly, the Development Viability Assessment demonstrates that, even under weak market conditions, residential schemes that provide 30%-40% affordable housing can also support a modest level of developer contribution while remaining viable." From pages 23, 25, and 27 of the viability assessment the data in the output tables do not entirely support this view and the text could be seen to be misleading (with the possibility that it could be misinterpreted at a later stage in the planning process). Land Securities is of the view that this sentence should be deleted as it could, at a later stage, be misinterpreted and is not supported by the Development Viability Assessment. Furthermore, it is noted that the intention is to review the issue of development viability in any event.</p>	Development viability assessment and affordable housing	Noted; text on affordable housing viability to be revisited in the Preferred Option document.
11	191	5.7	<p>Lots more sites will come forward and would have done before now if there had been a town centre design guide. This need to be taken into consideration when heights of buildings are concerned.</p>	Building heights	Building heights to be addressed through the Area Action Plan. A separate SPD may be prepared on detailed

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					components of design in the Area.
34	192	5.10	Section 5.10 I would like to suggest that the nature of industrial redevelopment in areas 07, 08 and 10 needs to be controlled. These areas are in the middle of residential neighbourhoods. Therefore any redevelopment in these areas should not include industry that is excessively noxious, noisy or 'high rise'. A more logical place for such industry would be alongside the railway tracks in area 02 where the impact would be less noticeable.	Impact on neighbours	Agreed. Proposals for industrial land will need to ensure, through design and layout that neighbouring residential uses are not impacted.
35	193	5.10	The type of industrial redevelopment in areas 06, 07, 08, 09, 10 and 11 should be limited. These areas are in the middle of residential neighbourhoods. Therefore any redevelopment should not include industry that is polluting, noisy or unsightly. The sensible place for such industry would be alongside the railway tracks in area 02 where redevelopment would have a minimal impact on residents.	Impact on neighbours	Noted; consider on the formulation of site Allocations as appropriate in the Preferred option document.
55	194	5.10	I would like to suggest that the nature of industrial redevelopment in areas 08 and 09 should be restricted. These areas are in residential neighbourhoods. The area should be limited to non-polluting, quiet and height limited businesses. The sensible place for noisy, polluting industry would be alongside the railway tracks in area 02 where the impact would be less noticeable.	Impact on neighbours	Noted; consider on the formulation of site Allocations as appropriate in the Preferred option document.
24	195	Picture 5.1	The largest site obviously presents a great opportunity and challenge to the area. Given the historical context of kodak as a hugely innovative cutting edge technology of it's day, helping to build Harrows economy. This should surely not be ignored for future growth. The cultural diversity is a global asset. We have it in plenty locally to reach out to the world. Visionary outreach to global markets should ensure prosperity for the borough for years to come, as it did in the past. This is a portal that could be closed down or opened up. Global context should be important to the borough as the citizens are global individuals. Not village closets. Some blue sky thinking should be included for growth forecasts which should surely supersede anything Kodak achieved in the 1930's with 6000 employees. Is it only that bravery my look like foolhardiness, so nobody is willing to examine what may ultimately produce stellar business growth for the borough. Where is the entrepreneurial representation on the committee to help produce prosperity for the residents?	Employment provision	Noted. Kodak is part of the Wealdstone Strategic Industrial Location (London Plan designation). Core Strategy policies seek to manage the redevelopment of the site as part of the delivery of employment as well as housing objectives in the Intensification Area as a whole.
11	196	Picture 5.1	There are loads more opportunities and site for redevelopment in this map. The age of building stock should also be shown to identify those buildings which are nearing or have reached the end of their useful life because they are ripe for renewal.	Other opportunity sites	Noted. The Preferred Option document will identify site allocations for development.
23	197	Picture 5.1	The accuracy of the delineation of these sites needs attention - e.g.:- Site 02 appears to include the existing Waverley Industrial Park adjacent to Hailsham	Site boundary clarification	Sites will be updated/reviewed and

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			<p>Drive; also unclear if Crown Court building is mistakenly included. Site 13 suggests that the Debenham's store is included? Site 17 suggests that the Baptist Church is included? The criteria /qualifying time line for inclusion in this list is unclear:- Site 12 is currently occupied by Tesco with an active planning application. How does this qualify as a potential development site? Site 19 although development is partial and suspended, why is it a potential development site? Site 20 is currently being developed - why is it a potential development site?</p>		<p>revised as necessary in the preparation of the Preferred Option document.</p>
47	198	Picture 5.1	<p>The Barratt Way Industrial Estate is located to the west of the London Borough of Harrow. The western part of the site is bounded by residential dwellings that are of inter-war character and arranged within a semi-formal street pattern. The southern part of the site is bounded by the railway line. The main access to the site is from Tudor Road, which provides road access to Uxbridge Road (A410). The Barratt Way Industrial Estate is highly accessible by public transport, being located 0.5 miles from Harrow and Wealdstone railway and underground stations. The station is on the Bakerloo Line, providing convenient access to Central London. A number of bus routes serve the surrounding area. Barratt Way Industrial Estate extends to approximately 0.6ha. The estate is characterised by single and two storey industrial units built of basic brick and concrete construction. The buildings on the site do not contribute positively to the surrounding residential area. There is evidence of decay to the structure of these buildings. The industrial buildings are clearly visible from Tudor Road and are of a design that is out of character of the surrounding area. The site is characterised as being low grade employment accommodation that lacks sufficient demand as emphasised by the high vacancy rates. These employment units have no strategic value and given their condition do not meet the needs of businesses in this part of Outer London in the medium to long-term. Workspace request that the Barratt Way Industrial Estate be allocated as a mixed-use development site that incorporates residential and employment uses. The allocation of this site for mixed-use development will provide an opportunity to improve the quality of the built environment at this site and enhance the surrounding area. The Barratt Way Industrial Estate currently offers light industrial space. However, these industrial units are in need of upgrading and modernising to meet the requirements of modern business. The cost of maintaining Barratt Way Industrial Estate has risen over recent years, which has led to an increase of service charges being passed on to the tenants. The refurbishment of the existing building is not a viable option to Workspace as the buildings have past the end of their economic cycle and the existing buildings may only be maintained in the short term. The existing layout is inefficient and</p>	Barratt Way Industrial Estate Site Context	<p>Noted. Consider as part of site allocations to be included in the Preferred Option document, having regard to employment as well as housing objectives to be delivered in the Intensification Area as a whole.</p>

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			<p>not suitable for use by modern business. The introduction of new commercial floorspace would accommodate the future needs of modern economy and would have a considerably longer economic cycle than can be achieved by the refurbishment of the existing buildings. New employment floorspace will help sustain the existing employment use and will enable sufficient flexibility and building quality to secure its continued use in the longer term. This will provide benefit in employment and economic terms through continuing to provide opportunities for a wide variety of small and medium sized businesses. The associated housing delivery as part of a mixed-use allocation will enable the continued delivery of this employment floorspace in the longer term and it should be recognised that without the housing element, redevelopment of this site would not be possible. The incorporation of housing within the scheme will assist in meeting the Borough's housing objectives on previously developed land and will meet a number of the Borough's key housing objectives. The incorporation of a residential element into a mixed-use allocation can be achieved by securing a more effective use of the site for employment and will not replace the employment use. The introduction of a residential use will not impact on the existing and surrounding employment uses. The allocation of this site for mixed-use development provides the opportunity to improve the setting of this part of Harrow. The allocation of the site for mixed-use business and residential development is consistent with Policy 5B.B of the London Plan, which seeks higher density of development in areas with good public transport accessibility. The provision of a mixed-use development incorporating high density, high quality housing is also consistent with the aims of PPS1 in supporting a more sustainable pattern of development, making best use of previously developed land. This approach is also consistent within national planning policy set out in the Ministerial Statement dated 23rd March 2011 and PPS4. The Ministerial Statement seeks to promote jobs and economic growth and it is stated that the Government's clear expectation is that the answer to development and growth should wherever possible be 'yes'. This Ministerial Statement goes on to state that when deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing. PPS4 and the Ministerial Statement both state that in determining planning applications, local planning authorities are required to ensure that they give appropriate weight to the need to support economic recovery and that applications that secure sustainable growth are treated favourably. It is therefore clear that the Council should support proposals that would secure economic modernisation at Barratt Way Industrial Estate and increase housing supply.</p>		
50	199	Picture	Please find attached our urban design strategy for the 0.7ha large	Development site	Noted. Consider as part

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		5.1	<p>redevelopment area PS9 of your UDP. The site is within the AAP. In more detail we also considered the area comprising the sites 335 Station road at the O'Neill's Pub to 315 Station Road which is the grade II listed Nat West Bank at the corner of St. Annes Street. We show how this specific town centre location can provide 8 storey mixed use schemes to spark development for the immediate area. This is very important as the area behind the pedestrian zones of St. Annes and Station Road are generally of very poor quality. Without a detailed strategy of new links that breathe life into the area, PS9 will remain 'derelict backland' in the middle of a town centre for years to come. The proposed location for a tower is based on the principle: respect the height of the pedestrian zones but provide a new face to the area behind. The location is also well chosen, as a tower would provide the town centre with a strong corner; while at the same time respecting the scale of pedestrian zone. The corner of Station Road and St Annes is not designated for a higher building as the bank is grade II listed. Please can you inform us if and how a strategy like the attached can be integrated into the AAP. Our urban design department has developed master plans for the cities of Hamburg, Heidelberg, Munich and Frankfurt and is registered in Germany to sign those off on policy level. Please refer to our website for more information. We would be very interested to get feedback and get more involved.</p>	opportunity	of site allocations to be included in the Preferred Option document, informed by urban analysis and masterplanning work.
4	200	Picture 5.1	<p>We agree, however it is important that 01 Zoom Centre Development does not result in loss of green space.</p>	Loss of open space	Agree. Core Strategy requires no net loss of open space and improved/increased public open space to serve the Intensification Area.
15	201	Picture 5.1	<p>We think there may be scope for redevelopment of the Safari Cinema site provided it retained a role in celebrating the cultural diversity of Harrow. We note that no development sites have been identified on the opposite side of Station Road between the cinema and the bridge where there is perhaps scope for a more attractive car-free residential development built to a higher density and enhancing the environment of Station Road for pedestrians and cyclists.</p>	Redevelopment of Safari Cinema	Noted. Consider as part of site allocations to be included in the Preferred Option document, informed by urban analysis and masterplanning work.
42	202	Picture 5.1	<p>Taylor Wimpey supports all of the potential strategic development sites and believes that the larger developments sites including Zoom Leisure Centre, Kodak, ColArt, Civic Offices, Debenhams Car Park and Station Road, Palmerstone Road East and the Driving Centre should be promoted first in order to kick start the regeneration of the wider Intensification Area.</p>	Support for proposed site allocations	Support noted.

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5	203	Picture 5.1	<p>Section 5 of the emerging AAP considers options to achieve the targets and objectives for the Intensification Area. Picture 5.1 lists potential strategic development sites within the Intensification Area which could contribute to the delivery of these targets. Dandara welcome that the former post office site is included within the associated table as we are of the view that the site forms an integral part in the delivery of the Intensification Area particularly given its exceptional location adjacent to a transport hub with excellent accessibility. Residential development is essential within Harrow town centre to support this highly accessible location and encourage young professionals to live here and subsequently support the employment, retail and leisure growth which the emerging Core Strategy seeks to achieve. The redevelopment of the former post office site will reinvigorate and provide a catalyst for the regeneration of this part of Harrow. We are of the view that this contribution should be recognised not only in Picture 5.1 but throughout the emerging AAP. Through our involvement in the Developers' Forum, it would appear that Dandara are one of the few landowners who is committed to delivery of development in the short-medium term. It is appropriate that the emerging AAP offers support for the redevelopment of the Kodak site with there being a number of specific references throughout the document (e.g. para. 1.5, para. 2.10, para. 3.30, within the SWOT analysis). However, we are of the opinion that the emerging AAP should offer the same level of support to the redevelopment of the former post office site. For example, the following statements from the emerging AAP could be revised to read:- "Redevelopment of key sites dispersed across the area, such as the former post office site at College Road, can reinvigorate and provide a catalyst for the regeneration of the whole area if carefully managed" (SWOT analysis, pg. 15). "Key development sites around the station, for example the former post office site at College Road (and redevelopment of the station itself) offer the opportunity to create better physical, visual and associative connections between Harrow on the Hill and Harrow town centre" (SWOT analysis, pg.16).</p>	Support for inclusion of 51 College Road for allocation	Noted. Consider as part of revised text for inclusion in the Preferred Option.
16	204	Picture 5.1	<p>Agree with the list of sites in so far as the information provided by the Council is presumed to be correct. Other sites to be considered - At some point Station Road East Side from the tip of gayton Road junction along to Lyon Road. The old Pub was empty for some time. The footpath alongside it goes through to Lyon Road - Could Provide access. Certain sites in St Johns Road (Apart form number 2). There are 2 small blocks of Maisonettes and a large empty office building looking rather neglected. Possible access through to Sheepcote Rd (and opportunities) Top of College Road - Kings House up to the Corner of Junction Road moving West.</p>	Support for proposed site allocations	Noted. Consider as part of masterplanning to inform site allocations to be included in the Preferred Option.

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43	205	Picture 5.1	Strategic Development Sites. We note that the draft Area Action Plan identifies a number of Strategic Development Sites. We propose that our client's site also be included as a Strategic Development Site for residential development. The site is located within the proposed Intensification Area and is centrally situated within a sustainable location. Details of the site are set out below: Site Address: Royal Mail Depot, Elmgrove Road, Harrow, HA1 2ED Site Area: 0.31 ha Proposed number of Units: 60 Flats A plan identifying the location of the site is included with this submission.	Seek inclusion of Royal Mail Depot site for allocation	Noted. Consider as part of site allocations to be included in the Preferred Option document, informed by urban analysis and masterplanning work.
51	206	Picture 5.1	Strategic Development Sites We note that the draft Area Action Plan identifies a number of Strategic Development Sites. We propose that our client's site also be included as a Strategic Development Site for residential development. The site is located within the proposed Intensification Area and is centrally situated within a sustainable location. Details of the site are set out below: Site Address: 118-134 College Road & Cervantes House, Headstone Road, Harrow (HA1 1PD & HA1 1BQ) Site Area: 0.25 ha Proposed number of Units: 150 Flats A plan identifying the location of the site is included with this submission.	Seek inclusion of 118-134 College Road & Cervantes House for allocation	Noted. Consider as part of site allocations to be included in the Preferred Option document, informed by urban analysis and masterplanning work.
19	207	Picture 5.1	Too much density without supporting services to match. Overcrowding will lead to social problems, something already being experienced.	Social infrastructure provision	Infrastructure requirements set out in the Borough-wide Infrastructure Delivery Plan and Core Strategy.
12	208	Picture 5.1	Picture 5.1 on page 25 of the consultation document identifies potential strategic development sites within the Intensification Area, and the table below provides the land area of each site. It is noted that the Zoom Leisure Centre and main Kodak sites are identified on Picture 5.1 and this is very much supported by Land Securities. The boundary of the Kodak site (Site 2 on the plan) is however, incorrect. As currently drawn, it also includes the Waverley Estate (between Kodak and the railway line). This boundary should be amended to omit the Waverley Estate. The site areas within the table on page 25 are inconsistent with those within the Planning Performance Agreement (PPA) for the Harrow View site. Land Securities sets out the areas within the PPA below for reference, and requests that they be reflected within the next iteration of the H&WAAP. Kodak operational site: 10.5ha Site cleared and vacated by Kodak: 5.4ha Kodak sports ground and car park site: 8.4ha	Support for inclusion of Zoom Leisure and Kodak sites for allocation	Noted; amend on maps included in the Preferred Option document.
52	209	Picture 5.1	Wealdstone Police Station - As per our November 2010 reps towards the 'Call for Sites' consultation, the MPA/S recommend that Wealdstone Police Station is allocated for a residential-led development within the emerging Area Action Plan. The designation of particular policing facilities for redevelopment allows the	Seeks inclusion of Wealdstone Police Station in site allocations	Noted. Consider as part of site allocations to be included in the Preferred Option document,

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			<p>MPA/S to implement their Estate Strategy which seeks to rationalise outdated and unfit for purpose facilities. It is pertinent to note that no existing policing facilities will be disposed of until relevant replacement provision has been provided and is fully operational. This ensures that effective borough policing will continue and complies with Policy 3A.18 of the London Plan which states that development plan policies should seek to ensure that appropriate facilities are provided and that the net loss (my emphasis) of such facilities must be resisted. Â In accordance with the London Plan, Policy CS 1 (criterion z) of the Pre-Submission Core Strategy (April 2011) states that the loss of community facilities will be resisted unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities. Â Mindful of this, should the Wealdstone Police Station site become surplus to MPA/S' future need, there will be no policy requirement to provide alternative community uses here.</p>		<p>informed by urban analysis and masterplanning work, having particular regard to the building's listed status and the need for adequate policing facilities to be maintained in the Borough.</p>
9	210	Picture 5.1	<p>THE COLART SITE, WEALDSTONE - As discussed in the introduction, ColArt will be vacating their 2.4 hectare site by the end of 2011. This therefore represents a significant opportunity for its redevelopment as part of the AAP. The site's immediate availability for redevelopment will help the Council make decisions about the sites they identify for particular uses to ensure the overall objectives for housing and employment growth are met. The early redevelopment of the ColArt site will signpost active regeneration and signal significant investment, and will be seen as a catalyst to other redevelopment in the area in that it will show other developers that there is clear developer intent in the area. Failure to have regard to the site's current status at this stage is considered to be a missed opportunity - the opportunity to redevelop the site is now. If the site is not promoted now, this could lead to implications for the future strategy for the HWIA. As discussed in the previous section, we consider it essential that the Council gives consideration to the availability of specific sites and their suitability for particular types of uses to ensure the right spatial growth options are chosen for the HWIA. Site Constraints for Future Employment Use As Penoyre & Prasad Architects have shown in the Site Study, contained at Appendix 2, the site is located within an established residential area, with residential gardens immediately abutting the site to the east, south and west. The Salvatorian College (secondary school) and St Joseph's Roman Catholic Church abut the northern edge of the site. The Whitefriars Children Centre and the Whitefriars First and Middle School are located to the western side of the site, and the Sri Lankan Muslim Cultural Centre is located to the south. Vehicular access into the site is via Whitefriars Avenue to the west and High Road to the east, which are both predominantly residential streets making HGV movements difficult. The site offers future permeability, and has a number of underutilised</p>	<p>Support for inclusion of ColArt site allocation</p>	<p>Noted. Consider as part of site allocations to be included in the Preferred Option document, having regard to employment as well as housing objectives to be delivered in the Intensification Area as a whole.</p>

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			<p>access points which are not suitable for HGV's or industrial traffic. Its strategic access is heavily restricted, being located 8km from Junction 4 of the M1, via suburban A-roads through residential areas. Given its location away from main roads the site remains unattractive for future, more intensive, industrial use.</p> <p>The site's location, irregular shape, and other immediate constraints, such as neighbouring residential and community uses, means it is therefore unlikely to attract new businesses following the closure of ColArt, particularly when there are more attractive employment sites nearby, including the Kodak site, which has identified capacity for further intensification. Indeed, the Employment Land Review (November 2010) undertaken by Nathaniel Lichfield and Partners, acknowledges the constraints of the site for future employment uses. It states that whilst the site offers good access to services and public transport owing to its location close to Harrow and Wealdstone train station, "residential properties surround the site tightly on all sides which could be incompatible with on-going industrial use, and a secondary school is located directly to the north of the site". It goes on to state that "the site also suffers from restricted local road access, a low profile and irregular shape". Based on this assessment, the Employment Land Review site concludes that the ColArt site is a "poor quality employment site", and only achieves a score of 15 (out of a maximum possible score of 30). Having regard to Table 5.3 on page 48 of the Employment Land Review, sites with a score of under 16 are considered to be of poor quality. Tellingly, the ColArt site has the joint second lowest score and is ranked 24th out of the 28 sites assessed. In direct comparison, the other AAP Strategic sites score significantly higher than the ColArt site. The Kodak site, which measures 15.2 hectares, is within the top ten employment sites within the Borough (joint fourth) in the Employment Land Review, achieving a score of 20 which puts it in the 'good quality' category. The Civic Centre is ranked even higher with a score of 22, and the Palmerstone Road/Oxford Road Industrial Estate site, achieved a score of 18 which falls within the 'average quality' category.</p> <p>4.10 Purely having regard to the physical characteristics of the site and its identified constraints, and the fact that the site has been occupied by the same company for over seventy years, we consider there will be significant difficulties in securing a new occupier on this soon to be vacant site. Opportunities for Residential Development - The fact that the site is located within an established residential area with many residential gardens immediately abutting the site, residential development is considered to be the most appropriate future use for the site. The character of the area clearly lends itself to residential development. There is an excellent opportunity to remove an existing non-conforming use from an area of environmentally sensitive development (including but not restricted to noise,</p>		

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			<p>traffic, odour, dust, etc). Although the existing occupant has been a good neighbour over the years, there is no guarantee that future occupants (utilising the site for its lawful use) will be, and there would be no control over the type of industrial user that may decide to occupy the site, albeit we do consider there will be difficulties in marketing the site given the constraints identified above. A residential scheme would not only improve the amenities of residents within this area of the Borough, but also improve the character and visual appearance of the area. An opportunity exists to remove a discordant and incongruous urban form, to repair the urban fabric, and remove inappropriate environmental effects. As discussed in Section 3, the first page of the AAP Issues and Options document states that the HWIA is not just about providing for new development and physical growth, it is also about "regeneration and the realisation of the social benefits and improvements to the overall quality of place that new development can deliver". The redevelopment of this site for wholly residential development would significantly improve the overall quality of this part of the Borough and enhance its sense of place. There is a real opportunity to repair and re-establish the townscape. The site has a Public Transport Accessibility Level (PTAL) rating of 4, reinforcing that the site has good accessibility. The "accessibility" of the site is a measure of its location to the availability of local public transport, walking and cycling routes, access to services and convenience, and limited reliance on private vehicle ownership, as opposed to "access", being physical constraints. A sustainable residential development would improve footfall, introduce new residents and consumers, in turn supporting the local retail offer and secondary services - resulting in greater local economic benefit. There is the opportunity to capitalise on the site's close proximity to the High Street, with easy access to shops and local transport. There is also an opportunity to improve permeability through the site which will improve the linkages between the High Street and the local community. Indeed, poor visibility and legibility is identified as a weakness for the area in the AAP. The redevelopment of the site for residential use would accord with the key diagram contained within the Core Strategy Submission Document and reproduced in the AAP Issues and Options Paper, which identifies the site for residential-led development. As discussed in Section 2 of our submission, the London Plan makes clear that capacity exists for the identified employment growth in the town centres through an uplift in retail, office and hotel development, as well as the intensification of the industrial and business uses within the Wealdstone Industrial Area. Not all of the new employment growth is therefore to be directed to the existing industrial areas within the HWIA - a significant proportion must be delivered within the two town centres. This means</p>		

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			<p>that not all of the existing industrial areas are required to accommodate additional jobs to meet the identified growth and therefore there is an opportunity to bring some of these sites forward for other uses. Indeed, as discussed the Core Strategy makes clear that subject to the consideration of the consolidation of the Wealdstone Strategic Industrial Location through the AAP, surplus employment land will be released for other uses in accordance with a sequential approach. Non-allocated sites will be considered first, followed by poorer quality allocated sites not within strategic industrial locations. Consideration of the 'weight' and 'balance' to be applied to the available evidence must be had. In this instance, the evidence is clear, and supports the fact that the ColArt site is not vital to meet the objectives for employment growth within the HWIA. The Council's own evidence base concludes that the ColArt site is a poor quality employment site and our representation has demonstrated that the site does not lend itself to future industrial use. We therefore consider that when reviewing the Wealdstone Strategic Industrial Location as part of the AAP, the Council should remove this site from the designation, and allow it to be redeveloped for housing.</p>		
33	211	Picture 5.1	<p>We support the location of the Intensification Area identified in the Harrow Core Strategy, and particularly support the inclusion of Lyon House as a Potential Strategic Development Site within the Intensification Area. For clarity, future references to this Potential Strategic Development Site should include Equitable House, especially as the area shaded for the Lyon House Potential Strategic Development Site on Picture 5.1 already includes the land occupied by Equitable House. Lockglide also supports the Council's aims for the Intensification Area, namely to: - Strengthen the role of Harrow Town Centre as a prosperous Metropolitan Centre within Outer London - Accommodate a minimum of 3,500 net new homes - Create a minimum of 3,000 additional new full time jobs - Renew Harrow town centre's office stock to meet local business needs, and to - Increase retail, leisure and hotel provision within both town centres. Lyon House and Equitable House are two of many vacant office buildings within the Area Action Plan area that are helping to 'create a sense of failure' in the Harrow office market. As such, we support the acknowledgement that: 'Redevelopment of key sites dispersed across the area can reinvigorate and provide a catalyst for the regeneration of the whole area' We also support the need to: - Manage density and height of new development successfully within the wider area - Strengthen the character and image of Harrow and Wealdstone - Improve the mix and scale of uses within the town centre. The provision of increased residential accommodation in Harrow town centre complies with key national planning policy as set out in PPS1 and PPS3. We support the proposal for more</p>	Support for the inclusion of Lyon Road site in the allocations	Support noted. Amend text to include Lyon House & Equitable House in the Preferred Option document.

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			housing within the Intensification Area. The proposed redevelopment of the Lyon House and Equitable House site could provide approximately 300 residential units in a mix of sizes including an affordable element		
36	212	Picture 5.1	<p>RE: Harrow Wealdstone Area Action Plan - Section 5.10 I would like to express my reservations that areas 08 and 09 should be used for industrial redevelopment as these areas are in residential neighbourhoods. Redevelopment should not include industries that will increase the noise or pollution. I feel these industries would be more suitable placed in area 02 where the impact would be less noticeable.</p>	Impact on neighbouring residential use	Noted. Consider as part of site allocations to be included in the Preferred Option document, having regard to employment as well as housing objectives to be delivered in the Intensification Area as a whole and amenity issues.
18	213	Picture 5.1	Add Site on corner of Harrow View and Balfour Road (Currently derelict home and garden)	Seeks inclusion of site for allocation	Not within the Intensification Area – exclude.
44	214	Picture 5.1	<p>The Site - 37-41 Palmerston Road, Wealdstone MP&G Trading welcome the focus on Harrow and Wealdstone that is advocated within the Core Strategy, and look forward to promoting their site further through the emerging Intensification Area AAP. Detailed discussions have been held with senior Planning Officers at Harrow Council to discuss the potential development of the site, and the principle of this has been formally agreed. A Location Plan is enclosed detailing the positioning and extent of the site. The owner has assembled a complete consultant team who have been instructed to prepare and submit a detailed Planning Application for the site, confirming that they are committed to delivering this sustainable and highly accessible site. It is considered that the site at 37-41 Palmerston Road responds positively to, and fits within the strategic and local objectives of the Intensification Area, supporting the site's identification as an Identified Development Site in the AAP. It is considered that the site would meet all (AAP and Core Strategy) emerging policy objectives for the following reasons:</p> <p>Is within the indicative boundary of the Intensification Area; Opportunity Site: under-utilised (sub)urban land; Land and buildings are within sole ownership, and is available and deliverable; Suitable location for residential development and other commercial / employment uses to deliver a mixed-use scheme; Potential for a 'landmark' building on this prominent line between Harrow and Wealdstone; Development potential for in the region of 70 units of various sizes; Residential use is an appropriate, complementary and sustainable form of high density development in this established suburban area, in a highly accessible location.</p>	Support the inclusion of Palmerstone Road sites in the allocation	Noted. Consider as part of site allocations to be included in the Preferred Option document, having regard to employment as well as housing objectives to be delivered in the Intensification Area as a whole.

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44	215	Picture 5.1	<p>Our client is pleased that their site at 37-41 Palmerston Road is included within an identified Potential Strategic Development Site within the Intensification Area, as shown at Picture 5.1. (Site Ref 08: Palmerston Road East. As demonstrated above, their site is deliverable, and they are committed to progressing with promoting an appropriate development here, which will fit with the aspirations and wider objectives of the Intensification Area and AAP. As such, the inclusion of Site Ref 08 within the Potential Strategic Development Sites within the Intensification Area is supported, and should be retained.</p>	<p>Support the inclusion of Palmerstone Road sites in the allocation</p>	<p>Noted.</p>
31	216	Picture 5.1	<p>The Site – 'Wickes House', 120-128 Station Road, Harrow Openscape Limited welcome the focus on Harrow and Wealdstone that is advocated within the Core Strategy and look forward to promoting this site, which they may potentially acquire, further through the emerging Intensification Area AAP. Preston Bennett have been appointed to examine the development potential of the property, and promote its allocation through the emerging LDF process. Accordingly, it can be demonstrated that the site offers clear development potential at this sustainable and highly accessible location. The site, which is identified on the enclosed Location Plan, is positioned on the enclosed Location Plan, is located on the eastern side of Station Road, and is in a prominent corner position, adjacent to Elmgrove Road. It is located within the defined boundary of Harrow Town Centre. Station Road provides the main linkage between the principal centres of Harrow and Wealdstone, and is therefore an integral consideration of the AAP. It is considered that the site at 120-128 responds positively to, and fits within the strategic and local objectives of the Intensification Area, supporting the site's position on Station Road. It is considered that the site would meet all (AAP and Core Strategy) emerging policy objectives for the following reasons: Is within the indicative boundary of the Intensification Area; Opportunity Site: under-utilised (sub)urban land; Land and buildings would be within sole ownership, and potentially available and deliverable in the medium-term; Suitable location for a range of development options, including residential and other commercial / employment, potentially to deliver a mixed-use scheme; Potential for a 'landmark' building on this prominent position; Potential for conversion, extension, or comprehensive redevelopment; Residential would be an appropriate, complementary and sustainable form of high density development in this established suburban area, in a highly accessible location. The existing building comprises approximately 30,000 sq ft gross internal floorspace, accommodated over ground, first, second and part-third floors. Currently in B1 Office Use, it is approximately 70% occupied, with the remainder of the floorspace vacant. As potential purchasers, Openscape Limited want to explore all development opportunities for this building located within the</p>	<p>Seeks inclusion of the Wickes House site for allocation in the AAP</p>	<p>Noted. Consider as part of site allocations to be included in the Preferred Option document, having regard to employment as well as housing objectives to be delivered in the Intensification Area as a whole.</p>

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			<p>Intensification Area, in the knowledge that there is significant surplus office space in the Borough. Currently operating with 30% vacant space, there is potentially going to be difficulties in finding an end-user for the large building at such time the current lease expires in 2013. Our client is aware of the marketing requirements to allow any additional uses to be considered, and these will be undertaken, commencing prior to departure of the current tenants. It is therefore considered an appropriate time to promote and explore the potential for other uses, in case this marketing for B1 is not successful. Given the site's location in the Intensification Area, this seems wholly appropriate. Comments on the AAP. Our client notes that 120-128 Station Road is not included within an identified Potential Strategic Development Site within the Intensification Area, as shown at Picture 5.1. However, it is opposite the identified Tesco site (Site 12). Taking its lead from this development opposite, it is considered there is potential to identify 120-128 Station Road as a potential site, particularly given its prominent location adjacent to this important 'corridor'. As demonstrated above, the site is potential deliverable in the medium term, and there is a commitment to progress and explore all potential development opportunities here, which will fit with the aspirations and wider objectives of the Intensification Area and AAP. As such, the inclusion of 120-128 Station Road within the Potential Strategic Development Sites within the Intensification Area is encouraged.</p>		
11	217	Picture 5.6	<p>Why 7+. They are only 7 or 8. 7+ infers much higher would be in this category and they would be acceptable, which they are not.</p>	Building heights	Urban analysis work to inform tall building policy in the Preferred Option document will include consideration of the setting of Harrow Hill and identified, locally important views.
7	218	6.0	<p>Officers note that, based on the evidence provided, all options would be likely to deliver or exceed housing and employment targets for the intensification area within the London Plan, and the Council's Core Strategy. This is welcomed.</p>	Housing targets	Support noted.
4	219	6.0	<p>We rank Option 1 - 3, Option 2 - 4, Option 3 - 2 and Option 4 - 1 Option 4 achieves more benefits than the other three Options Option 2 would lead to further deterioration of Wealdstone, which in turn could impact on viability of the Kodak site.</p>	Spatial development option 4 - support	Support for Option 4 noted.
43	220	6.0	<p>Our client would like to express support for Option 1 (One Centre) for the following reasons: Option 1 offers the most balanced approach to growth which is spread across both centres; Option 1 would make the most efficient use of both transport hubs; Option 1 proposes high levels of balanced residential</p>	Spatial development option 1 - support	Support for Option 1 noted.

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			development - this sector is likely to recover more quickly and more fully than commerce and industry; Option 1 is most likely to provide the initial momentum and confidence to "kick start" the wider economic recovery of the Borough; Option 2 has unrealistic expectations for employment growth and will result in a surplus of under utilised sites and premises; Both Options 2 and 3 would result in "lop-sided" growth which would be to the benefit of Harrow and detriment of Wealdstone, and Option 4 would result in Wealdstone continuing to be the focus of industrial/commercial development which would result in the Harrow being redeveloped at a greater pace.		
16	221	6.0	Options : Provisionally I've chosen a mix of Options 3 and 4 but these need refining. Two Centres: Harrow and Wealdstone do have a separate 'feel' to them. But Station Road between Tesco and the Civic Centre has its own character too: it is useful for the 'small shops' enterprises (which are many and varied - especially on the Western side). These should be encouraged and left to flourish 'on their own' as they have done. There is little empty property along here 'Flatted development' has already begun on the other side of the road and may well continue. Harrow Civic Centre: As a large 'stand-alone' site in an already fairly harsh environment this belongs more to Wealdstone. It should be treated as such - able to take fairly high-density development, though all of this needs to be 'managed' to ensure the least negative impact and that an attractive front is presented to Station Road.	Spatial development option 3 & 4 - support	Preference for a hybrid of options 3 and 4 noted.
9	222	6.0	Response to Options - Having considered all the options, we are of the view that either Options 1, 3 or 4 should be pursued. Given that the London Plan's identified intensification area covers the towns of both Wealdstone and Harrow, we do not consider that Option 2, which seeks to focus all of the new growth in Harrow, would meet the Mayor's aspirations for the area. We agree with the consultation forums that new growth should be directed to both Harrow and Wealdstone, and that improvements are required to Station Road. Notwithstanding the above, although we appreciate the Council is focusing on the general distribution of new growth across the HWIA in this consultation, rather than identifying specific sites for particular types of use, we consider it vital that the Council has some regard to specific sites at this stage of the plan preparation to ensure that the new growth identified can actually be delivered. The Council need to be aware at an early stage which sites are available for development and the likely use for a particular site, in order to decide on the spatial distribution of the new growth. There is a danger that if an assessment of the various strategic sites is not undertaken at this stage, the significant identified housing and employment growth will not be delivered on the ground. The ColArt site is capable of being accommodated in all Options. However,	Spatial development option 2 – not supported	Consideration of site deliverability (including phasing) will inform selection of site allocations and preparation of the Preferred Option for consultation. Core Strategy Policies provide basis and criteria for review of employment sites including the Wealdstone strategic industrial location. This will inform site allocations to be included in the Preferred Option

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			<p>based on the Council's own evidence base and the opportunities and constraints outlined in document prepared by Penoyre & Prasad, we consider that the ColArt Site is a suitable site for residential development, most readily within Options 1, 3 and 4. Paragraph 6.63 of the consultation document states that all options have taken into account the SIL designations in Wealdstone and to a greater and lesser extent encourage the continued use of designated sites for industrial and employment uses. It goes on to state, that where justified, and to secure new employment growth, consideration will be given to consolidation of the SIL. As discussed in Section 2, we consider the AAP represents the perfect opportunity to review the Wealdstone Preferred Industrial Location and agree that the amended boundary should reflect the recent discussions with the GLA regarding the SIL. The review should be evidence-led and have regard to the findings of the Employment Land Review which ranks the industrial sites within the Wealdstone Preferred Industrial Location in order of quality of employment land/space. Clearly those sites which rank highly should be given priority over those sites which rank poorly, when considering which sites should remain within the designation.</p>		document.
33	223	6.0	<p>It is our view that both Option 3: Two Centres and Option 4: High Roads and Centres are appropriate approaches to future regeneration in Harrow and Wealdstone. Both these options support employment and residential development within Harrow town centre. Both options also advocated the delivery of new homes through predominantly flatted developments. Both Options 3 and Options 4 propose public realm improvements in Harrow Town Centre.</p>	Spatial development option 2 & 4 - support	Preference for Options 3 and 4 noted.
44	224	6.0	<p>It is encouraging that there is the focus on creating a Harrow and Wealdstone Intensification Area, and it is anticipated that the significant level of homes and jobs that are proposed will have a hugely beneficial effect on the area and wider Borough. Whilst these targets are ambitious, it is considered that they can be achieved through the right mechanisms. The AAP provides details of the four development delivery Options that are being considered at the outset of the process of planning for the area through emerging policy. Whilst our client would support the objectives of Option 3, it is Option 4 which is the preferred approach to development, being the Option which would provide the best mechanism for delivering the overarching objectives of the Intensification Area, and achieving the objectives clearly set out in the AAP and indeed within Policy CS2 of the emerging Core Strategy. Option 4 is therefore supported. The AAP acknowledges the important role that existing sites will play in delivering housing within the areas of principal focus. This acknowledges opportunities for mixed-use developments at higher densities in tall, landmark buildings will be</p>	Spatial development option 4 - support	Support for Option 4 noted.

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			encouraged. These sentiments are strongly supported in the context of the clear role that our client's site at 37-41 Palmerston Road, included within an Identified Strategic Development Site and identified on the enclosed Location Plan, can play in significantly contributing to meeting the clear objectives of the AAP.		
45	225	6.1	I do not support this option Wealdstone and Harrow Town Centre are two distinct communities with different priorities and problems and must be treated seperately.	Spatial development option 1 – not supported	Option 1 note supported.
56	226	6.1	Do not support. Would reduce quality of life with too much housing in such a small area.	Spatial development option 1 – not supported	Option 1 not supported.
53	227	Picture 6.1	LDF Officers Harrow Council Further to the flyer handed out at the Community Forum Meeting on 20 June and being unable to go through the whole document found on www.harrow.gov.uk/heartofharrow which would take more than ten minutes. I would just like to give my personal preferences for the options listed. 1st Option 1 providing buildings are not too high to be detrimental to the view of Harrow-on the Hill and that the Headstone Manor area is enhanced along with other surrounding green spaces and some of Wealdstone's Victorian characteris maintained/ matched. 2nd Option 3 3rd Option 4 4th Option 2	Spatial development option 1 - support	Support Option 1.
22	228	Picture 6.1	Option1 Rob the distinctiveness of the town centre and Wealdstone, potentially watering down the different offers of both. Also potentially destroy the 'High Street' businesses along Station Rd.	Spatial development option 1 - support	Option 1 not supported.
7	229	Picture 6.1	The GLA notes that this option would maximise development capacity, and exceed Core Strategy targets for new homes and jobs. However, it would present significant challenges in terms of retaining the differential character of the various regions within the intensification area identified in Chapter 3, and the baseline report. The GLA does not, therefore, recommend that the Council take this option forward.	Spatial development option 1 – not supported	Note the reason given for why this option is not fully supported
47	230	Picture 6.1	Workspace supports Option 1, provided that the boundaries include Barratt Way Industrial Estate, Tudor Road. Barratt Way Industrial Estate is conveniently located for the area's public transport services and provides a significant opportunity in which increase the economic output from the site, promote small and medium sized enterprises and increase housing provision.	Spatial development option 1 - support	Support for Option 1 and the reasoning is noted
15	231	Picture 6.1	Option 1 tries to cram far too much into the area for there to be any hope of providing an attractive sustainable environment. It would be a recipe for traffic congestion pollution and environmental degradation	Spatial development option 1 – not supported	Note the reason given for why this option is not supported
51	232	Picture 6.1	Proposed Growth Options Our client would like to express support for Option 1 (One Centre) for the following reasons: Option 1 offers the most balanced approach to growth which is spread across both centres; Option 1 would make the most efficient use of both transport hubs; Option 1 proposes high levels of	Spatial development option 1 - support	Support for Option 1 and the reasoning is noted

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			<p>balanced residential development - this sector is likely to recover more quickly and more fully than commerce and industry; Option 1 is most likely to provide the initial momentum and confidence to "kick start" the wider economic recovery of the Borough; Option 2 has unrealistic expectations for employment growth and will result in a surplus of under utilised sites and premises; Both Options 2 and 3 would result in "lop-sided" growth which would be to the benefit of Harrow and detriment of Wealdstone, and Option 4 would result in Wealdstone continuing to be the focus of industrial/commercial development which would result in the Harrow being redeveloped at a greater pace.</p>		
12	233	Picture 6.1	<p>It is noted from paragraph 6.1 of the consultation document that Option 1 (One Centre) aims to create a single, cohesive character across the three sub-areas. Land Securities agrees with the Council's assessment within paragraphs 6.3-6.6 that this Option represents an approach that is too uniform for such a large area; and queries whether it would be possible, and critically whether it would be the right thing to do, to seek one homogeneous character for the Intensification Area. This would serve to dilute the individual character of the areas that exist at present, and would not conform to best-practice place-making principles.</p>	Spatial development option 1 – not supported	Note the reason given for why this option is not supported
9	234	Picture 6.1	<p>Option 1: One Centre 3.5 We understand that this option aims to create a single cohesive character across the three sub-areas (Wealdstone, Station Road and Harrow Town Centre), underplaying the existing distinction between the three. Development type and densities is applied equally across the whole area, and high levels of residential development and job outputs across the HWIA are anticipated, requiring maximisation of the capacity of all sites. We understand this to be the least popular option amongst the consultation forums, as there was a general consensus that the distinction of the two centres should be retained and improvements promoted along Station Road. With this option, 1500 homes are identified in Wealdstone, 1000 in Harrow, 400 on Station Road, and 600 on additional and infill sites, giving a total of 3500 homes (2900 homes would be delivered on the major strategic sites). In terms of employment, 1900 jobs would be provided in Wealdstone, 500 on Station Road, 900 in Harrow and a further 900 on additional and infill sites. This gives a total of 4800 jobs, of which 3900 would be provided on strategic sites.</p>	Spatial development options	None
30	235	Picture 6.1	<p>Of the four options proposed, I agree with option one as the only real option, since Harrow and Wealdstone have always been linked (also because of the railway Lines) and a good balance is achieved either side of the Civic Centre, between the two. Since the Post Office was relocated, this road (College Road), situated as it is right in the middle of Harrow Town Centre is rather disappointing. The successful and enjoyable ensemble of St. Georges shopping mall, the pedestrianised St Anne's road, with its benches and stalls, and St. Anne's</p>	Spatial development option 1 - support	Support for Option 1 and the reasoning is noted

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			shopping centre, makes one feel all the more that if the problem of College Road could be solved, Harrow centre would be eminently visitable in its own right. I feel very strongly that when a redevelopment comes - whether the old post office building is to be re-used, or whether a new development is going to occur - the road would benefit enormously from a traffic-calm green area or space, with benches where people can sit, all year round. The size of the old post office - as deep, or deeper, that it is wide - would surely allow this. then one could look forward to College Road as one does to the rest of the town centre.		
44	236	Picture 6.1	Option 1, promoting a single centre approach to development, is the most ambitious of all the development delivery options promoted within the AAP. Whilst our client supports the principles of Option 1, it is heavily reliant on significant investment in to the Borough, and there is concern this may be overly ambitious. We welcome the consideration of the wider area, and would support the mix of uses in the Wealdstone area. However, this would not be the preferred Option.	Spatial development option 1 – not supported	Note the reason given for why this option is not supported
31	237	Picture 6.1	Option 1: One Centre Option 1, promoting a single centre approach to development, is the most ambitious of all the development delivery options promoted within the AAP. Whilst our client supports the principles of Option 1, it is heavily reliant on significant investment in to the Borough, and there is concern this may be overly ambitious. We welcome the consideration of the wider area, and would support the attention that would be paid to the Station Road area. However, this would not be the preferred Option.	Spatial development option 1 – not supported	Note the reason given for why this option is not fully supported, even if the principles are in part supported
21	238	6.3	Part of the allocation area falls within flood zones 2 and 3. This should be mentioned in the Option Assessment. The SFRA should be used to inform the location of new development. This is important as the sequential approach should be used to steer development away from areas at flood risk.	Flood risk	Agreed, also see proposed minor amendments to the Core Strategy that seek to address this point that will be carried forward through the AAP
21	239	Picture 6.4	We support option 2 as the more vulnerable uses are located outside flood zones 2 and 3.	Spatial development option 2 - support	Note the Support for Option 2 and the reason provided for this support
22	240	Picture 6.4	Ignores the potential of Wealdstone especially benefit of Wealdstone's transport links as outlined in section 3.21	Spatial development option 2 – not supported	Note the reason given for why this option is not supported
7	241	Picture 6.4	If the focus of renewal was Harrow Town Centre, Wealdstone & Station Road would continue to decline and the opportunities arising from the significant potential development sites in Wealdstone would not be realised. Harrow Town Centre would also become over-burdened to accommodate the projected jobs	Spatial development option 2 – not supported	Note the reason given for why this option is not supported

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			and homes. Wealdstone & Station Road would become even more deprived and all that that would entail. This is not acceptable.		
7	242	Picture 6.4	This option focuses growth in Harrow Metropolitan town centre. While in some respects this approach would reflect the aspirations of the London Plan in terms of directing most growth towards town centres, it may not provide Wealdstone District centre with the investment needed in order for it to regenerate. The GLA does not, therefore, recommend that the Council take this option forward.	Spatial development option 2 – not supported	Note the reason given for why this option is not supported
12	243	Picture 6.4	Workspace objects to Option 2 as it fails to recognise the regeneration opportunities in close proximity to Harrow and Wealdstone Train Station, such as, those at Barratt Way Industrial Estate, Tudor Road. This option is likely to sterilise the land to the north Harrow Town Centre to the detriment of the local economy and local environment.	Spatial development option 2 – not supported	Note the objection to this option and the reasons provided
9	244	Picture 6.4	Option 2 (Harrow Plus) focuses the vast majority of the anticipated growth within the Intensification Area on Harrow Town Centre. As paragraph 6.18 of the consultation document notes, "this risks dismissing the importance of Wealdstone's role as an additional commercial centre and by doing so risks a lack of investment in the area." The Intensification Area covers Harrow and Wealdstone and in Land Securities' view, seeking to focus solely on one could be to the detriment of the other, as well as to the delivery of the overall vision for the AAP area.	Spatial development option 2 – not supported	The concerns raised regarding Option 2 are noted
44	245	Picture 6.4	Option 2: Harrow Plus With this option, we understand the majority of the intensification (housing and employment development) would be focused in Harrow, which will require tall, flatted development. For Wealdstone, the focus would be on maintaining existing industrial areas. Like option 1, this option received little support at the forums because the enhancement of both Wealdstone and Harrow town centres is considered to be important. 3.8 Only 600 new homes would be delivered in Wealdstone under this option, with the majority (1500) located in Harrow, 600 on Station Road, and 600 on additional and infill sites, giving an overall total of 3200 homes, with 2900 on strategic sites. In terms of employment, 900 jobs would be provided in Wealdstone, 2200 in Harrow and a further 1100 on other sites, giving an overall total of 4300 jobs, of which 3900 jobs to be provided on strategic sites.	Spatial development options	None
31	246	Picture 6.4	Our client would like it to be noted that they object to the approach set out within Option. It is considered that a focus solely on Harrow's town centre would have significant detrimental effect on the wider area, undermining the objectives of the Intensification Area. Wealdstone is clearly in need of significant investment, and the AAP specifically states at the outset within its objectives that there is extensive opportunity here (Paragraph 3.7) and that the area around Harrow and Wealdstone Station is in significant need of improvement (Paragraph 4.19). To	Spatial development option 2 – not supported	Note the objection to this option and the reasons provided

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			effectively neglect this Wealdstone area would be contrary to the objectives of the Intensification and AAP and Option 2 should be disregarded.		
	247	Picture 6.4	Option 2: Harrow Plus Our client would like it to be noted that they object to the approach set out within Option 2. It is considered that a focus solely on Harrow's town centre would have significant detrimental effect on the wider area, undermining the objectives of the Intensification Area. Station Road is clearly in need of significant investment, representing an important link between the two centres in the Intensification Area, and the AAP specifically states at the outset within its objectives that there is extensive opportunity here, and is in significant need of improvement (Paragraphs 4.20 - 4.24 and identified 'Key Issues and Opportunities' at page 20). To effectively neglect this, as well as the centre of Wealdstone, would clearly be contrary to the objectives of the Intensification and AAP and Option 2 should be disregarded.	Spatial development option 2 – not supported	Note the objection to this option and the reasons provided
45	248	6.16	I do not support this option as Wealdstone and Harrow Town are two distinct communities with different needs and priorities	Spatial development option 2 – not supported	Note the reason given for why this option is not supported
12	249	6.16	Paragraphs 6.16 and 6.17 describe the "Harrow Plus" option. It is noted that paragraph 6.16 states "the housing targets would likely need to be achieved via tall, flatted developments to achieve the target numbers." It is noted that tall flatted developments would not meet the identified housing need within the Borough, which is for family dwellings.	Spatial development option 2 – not supported	The concerns raised regarding Option 2 are noted
21	250	6.18	Part of the allocation area falls within flood zones 2 and 3. This should be mentioned in the Option Assessment. The SFRA should be used to inform the location of new development. This is important as the sequential approach should be used to steer development away from areas at flood risk.	Flood risk	Agreed, also see proposed minor amendments to the Core Strategy that seek to address this point that will be carried forward through the AAP
31	251	6.29	Option 3: Two Centres Option 3 is considered to provide a focused approach to development delivery, and is considered to provide the level of focus that Wealdstone requires to enable its improvement through inward investment. This would inevitably lead to some improvements and investment on Station Road. Option 3 would not represent our client's preferred options . This option is considered to promote a sustainable and appropriate spread across the Intensification Area, and it is welcomed that there is specific reference to Station Road as being the key connection' between the centres of Harrow and Wealdstone. However, there is specific reference that only minor amendments to Station Road, the "opportunity for wider redevelopment along this strip is missed" (Paragraph 6.34). This would clearly be to the detriment of achieving the	Spatial development option 3 - not supported	Note the reason given for why this option is not fully supported

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			overall objectives of the AAP, hence why Option 3 is not supported.		
22	252	Picture 6.7	Economic Development prefer Options 3. However, need to consider that interventions to improve traffic flow on Station Rd, does not have an adverse impact on businesses located on that Rd. Especially, if that means reduced parking for those using the restaurants on Station Rd.	Spatial development option 3 - supported	Support for Option 3 is noted along with the comments regarding traffic flow improvements to Station Road
7	253	Picture 6.7	This option would appear to deliver London Plan objectives for both Harrow Metropolitan town centre and Wealdstone district centre, however, may miss opportunities for regeneration of the Station Road corridor. The GLA does not, therefore, recommend that the Council take this option forward.	Spatial development option 3 – not supported	Note the reason given for why this option is not fully supported
12	254	Picture 6.7	Option 3 (Town Centres) seeks to focus development on Harrow Town Centre and Wealdstone, with limited improvements to the Station Road corridor. Land Securities agrees with the Council's acknowledgement at paragraph 6.34 of the consultation document that 'with only minor adjustments to Station Road, the link between the two areas is not strengthened and the opportunity for wider redevelopment along this strip is missed.	Spatial development option 3 – not supported	Noted
9	255	Picture 6.7	Option 3: Two Centres This option continues the existing character and use patterns of the three sub areas. The two town centres are the focus for development and Station Road receives improvements to its public realm and highway network. Under this option, Wealdstone's dominant industrial employment locations are retained and further employment is created on the Kodak site. The housing would be achieved by mostly family housing in Wealdstone and flats in the town centre. The Wealdstone sites would need to play a significant housing and employment role. This option received good support because it was considered that the two town centres should retain their distinctive character and that new growth should be focused in both centres, with improvements to Station Road. 3.10 Around 1400 homes would be provided in Wealdstone, 1000 in Harrow and 400 on additional and infill sites, giving a total of 2900 new homes, 2500 of which would be provided on strategic sites. In terms of employment, 1500 jobs would be provided in Wealdstone, 10 on Station Road, 1500 in Harrow and 700 on other sites. This would provide a total of 3700 jobs, with 3010 being provided on the strategic sites.	Spatial development options	None
44	256	Picture 6.7	Option 3 is considered to provide a focused approach to development delivery, and is considered to provide the level of focus that Wealdstone requires to enable its improvement through inward investment. Option 3 is supported, and would be our client's second choice in respect of preferred options. This option is considered to promote a sustainable and appropriate spread across the Intensification Area, and it is welcomed that there is specific reference to the role that sites in Wealdstone will play in providing significant housing and	Spatial development option 3 - support	Support for Option 3 as a second preferred choice is noted as are the reasons provided

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			employment (Paragraph 6.33), with the recognition at Paragraph 6.39 that there are opportunities for denser, taller housing developments in Wealdstone to expand its existing character.		
45	257	6.30	I fully support this option as I believe Wealdstone and Harrow Town are two distinct communities with differing priorities as therefore must be treated as such.	Spatial development option 3 - support	Support for Option 3 and the reasoning is noted
46	258	6.30	I support this option and believe individual development sympathetic to each location is preferable to the other options.	Spatial development option 3 - support	Support for Option 3 and the reasoning is noted
54	259	6.30	<p>We believe that option 3 is the better one. Wealdstone and Harrow should be kept as 2 separate entities. Station Road should not be overdeveloped. TESCO SHOULD NOT BE ALLOWED TO EXPAND. It will empty other shops by its competition eg clothing, toy shops. Tesco is far too powerful. Traffic will be horrendous at that point near Station Road. It is already hazardous.</p> <p>We hope that Kodak playing field and St. George's playing field remain Green open Spaces. Near the Intensification area they will be needed. We hope that there are indeed safe green spaces left for relaxation for adults and children.</p> <p>Again we think option 3 the best one: i.e 2 separate centres.</p> <p>For housing we prefer 3,4,1,2 in that order, For jobs 3, 4 2,1.</p> <p>Offices: Harrow has empty ones; has the reason for this been investigated? Do we need more?</p> <p>Better shopping and leisure facilities would enhance Central Harrow. Good Restaurants were bought up by MacDonaldis and its ilk, so now they are mostly fast food ones. Where is the class in shops and eating places? There are some on the Hill, the rest are pretty awful.</p> <p>The support of Public Houses is agreed and we are glad that no more are to be lost. I know of at least 8 in Harrow. The Kings Head with its large garden and view was once a delight to visit.</p> <p>The arguments mentioned cover why we think Options chosen are the least detrimental. Wealdstone is nearer to open land in Harrow Weald and can take the greater population and industry. Harrow Hill views must be preserved for all and not just for those lucky enough to be living in a Tower block facing it.</p> <p>Stations and railways cause problems e.g. Wealdstone Railway Bridge in Headstone Drive and lack of access to parkland behind Harrow on the Hill Station. Little can be done for Wealdstone but harrow could have a lift or a connection by footbridge to the station from St. Anne's Mall. A foot bridge could be considered to ease access from the station of the court House and the Kodak site.</p> <p>Harrow has grown piecemeal; it is to be hoped that with a good plan it will become pleasanter to live in. Sustainable with all its green places kept.</p> <p>I refer to a report from Defra; "UK green spaces are worth £30, Billion in health</p>	Spatial development option 3 - support	Support for Option 3 and the reasoning is noted

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			<p>benefits". A view of green spaces is worth £300.00 per person per year. Fact-not fiction.</p> <p>We need our green ways and open spaces. Open up the waterways so stupidly culverted. Give the Youth places to play in boredom leads to criminal behaviour.</p>		
47	260	6.31	<p>Workspace supports the principle of Option 3, provided that the boundaries include Barratt Way Industrial Estate, Tudor Road. Workspace objects to paragraph 6.31 which seeks to retain the existing industrial uses. This approach is not flexible and does not take account of the future economy and potential for future economic development. This policy should allow the redevelopment of inefficient employment areas for mixed-use developments that incorporate modern and flexible employment floorspace for small and medium sized enterprises. New employment floorspace will help sustain existing employment use at such sites and enables sufficient flexibility and building quality to secure its continued use in the longer term. This will provide benefit in employment and economic terms through continuing to provide opportunities for a wide variety of small and medium sized businesses and securing space for new and emerging markets and/or existing thriving markets. To regenerate under-used and inefficient employment floorspace, a higher-value use is often required to enable development. The associated higher-value land use as part of a mixed-use development will secure the delivery of this employment floorspace. Without this higher value element, the redevelopment would be unviable. This approach can deliver increased economic efficiencies by increasing the economic output of an area and can also deliver much needed housing. Workspace have successfully adopted this approach at a variety of sites across London. Barratt Way Industrial Estate is conveniently located for the areas public transport services and provides a significant opportunity in which increase the economic output from the site, promote small and medium sized enterprises and increase housing provision.</p>	Spatial development option 3 - supported	Support for Option 3 is noted. The Council does consider that the Core Strategy already provides the flexibility, through the AAP to seek retention of the economic use of these existing sites through consideration for redevelopment for wider economic development alongside enabling development.
12	261	6.31	<p>Within the Option Assessment for Option 3, paragraph 6.31 notes that "Wealdstone's dominant industrial employment uses are retained and further employment is created on the Kodak site." It is considered that it should be made clear within this text that the retention of existing industrial uses can only be sought where appropriate, and where robust evidence exists to support this. Policy EC2.1(h) confirms that existing site allocations should not be carried forward from one version of the Development Plan to the next without evidence of the need and reasonable prospect of their take-up during the Plan period. If there is no reasonable prospect of a site being used for the allocated economic use, PPS4 advises that the allocation should not be retained, and wider economic uses or alternative uses should be considered. The creation of "further</p>	Kodak site employment requirements	As Land Securities are aware the Council is working with Land Securities, the GLA and others, including local businesses, to determine the long-term economic prospects and future for the Kodak site to ensure that any consolidation of the SIL is supported by

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			employment" on the Kodak site (paragraph 6.31) needs to be considered in the context of the contribution the site can make to employment targets within the Intensification Area as a whole, having regard to achieving a sustainable development, including achieving a balanced approach to homes and jobs. This is supported by paragraph 6.33 of the consultation document, which confirms that the Wealdstone sites will need to play a significant housing and employment role.		robust evidence.
21	263	6.33	Part of the allocation area falls within flood zones 2 and 3. This should be mentioned in the Option Assessment. The SFRA should be used to inform the location of new development. This is important as the sequential approach should be used to steer development away from areas at flood risk.	Flood risk	Agreed, also see proposed minor amendments to the Core Strategy that seek to address this point that will be carried forward through the AAP
48	264	6.38	My preference is for option 3 (ie Two Centres: The existing characters of Harrow and Wealdstone are enhanced by development that is sensitive and responsive to their individual characters).	Spatial development option 3 - supported	Support for Option 3 and the reasoning is noted
20	265	6.38	My preference is for option 3 (ie Two Centres: The existing characters of Harrow and Wealdstone are enhanced by development that is sensitive and responsive to their individual characters).	Spatial development option 3 - supported	Support for Option 3 and the reasoning is noted
57	266	6.38	My preference is for option 3 (ie Two Centres: The existing characters of Harrow and Wealdstone are enhanced by development that is sensitive and responsive to their individual characters).	Spatial development option 3 - supported	Support for Option 3 and the reasoning is noted
22	267	Picture 6.10	There is concern that option 4 would require significant intervention (e.g through CPOs etc) and investment in Station Road to be achieved, diverting money, time and resources away from the key centres of Harrow Town Centre and Wealdstone.	Spatial development option 4 – not supported	Concerns regarding option 4 are noted
23	268	Picture 6.10	Option 4. Wealdstone & Harrow Town Centre are 2 different places. They both need resuscitation - the latter as a Metropolitan centre, the former as an uplifting local centre and with an emphasis on "industrial" employment. Station Road acts as the vital artery between the 2 centres, all the more so because of the 2 nodal rail stations which are the public transport modal gateways to the area and as the feeder route to / from other parts of the borough and north of Harrow. Station Road must also give the "right impression" coherent with re-development of the 2 centres. It therefore needs comprehensive revitalisation, decongesting and decluttering which will also result in it becoming a destination in its own right	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted
7	269	Picture 6.10	This option has the potential to deliver London Plan objectives for the two town centres, as well as stimulating the renewal of Station Road, which acts as the corridor between them. This scenario represents the GLA's preferred option, and	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted

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			it is recommended that the "High Roads and Centres" approach is taken forward to be developed in more detail. As highlighted in paragraph 6.47 of the consultation document, the Council should ensure that policies are developed in a way that would resist inappropriate out of centre retail and leisure development within the station road corridor.		
10	270	Picture 6.10	Option 4 the most suitable in maintaining Wealdstone as a District Centre and Harrow as a metropolitan centre, allowing both centres to develop their own identity and character whilst regenerating the station road corridor. Station Road from Harrow town Centre through Wealdstone High street and High Road needs to be radically upgraded to improve pedestrian, vehicular and public transport connectivity together with improved public realm, making journeys between the two centres an attractive proposition and experience. The future regeneration of the 'High Roads' corridor should consider encouraging developers to replace current tired building stock with well designed medium height buildings of mixed uses such as four to six storey residential and commercial over street level public realm uses such as shops, cafes, restaurants and entertainment facilities creating a boulevard atmosphere and pavement culture. The council should consider piazzas and small squares with hard and soft landscaping with tree planting, public art and water features, the creation of a large square in front of the Civic centre with the removal of car parking (possibly underground).	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted
47	271	Picture 6.10	Workspace supports the principle of Option 4, provided that the boundaries include Barratt Way Industrial Estate, Tudor Road. Workspace objects to paragraph 6.44 which seeks to retain the existing industrial uses. This policy is not flexible and does not take account of the future economy and potential for future economic development. As discussed above under Option 3, it considered that existing under-used industrial areas should be identified for mixed development that includes modern employment floorspace with higher value uses that are necessary to enable economic development.	Spatial development option 4 - supported	Support for Option 4 is noted. The Council does consider that the Core Strategy already provides the flexibility, through the AAP to seek retention of the economic use of these existing sites through consideration for redevelopment for wider economic development alongside enabling development.
8	272	Picture 6.10	Of the 4 options, CBHE finds option 4 less unpalatable than the other 3 because it includes regeneration of Wealdstone and Station Road as well as Harrow town centre and aims to retain the character of each area. However we have serious reservations about how any of these options will be put into practice. In all the options, between 48 and 60% of development land in the town centre will be given over to residential use. This seems to contradict the policy outlined in the	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted as are the concerns raised also noted.

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			<p>core strategy and reproduced in the AAP (Picture 1.1), that development in the town centre will be employment led, while that in the Station road corridor will be housing led. Even in option 4, which includes the most extensive development of Station Road, proportionally less land is assigned to housing there than in the town centre. Will the remaining land in the town centre be sufficient to cover all the other uses necessary for successful regeneration, including commercial, retail, public amenities, open space? If development of employment and infrastructure is deficient, central Harrow will never be more than a dormitory town. In all the options Harrow town centre, compared to the Station Road and Wealdstone areas, has the largest proportion of land allocated for homes but it has the smallest proportion of land earmarked for community use and in option 1 and 3 there is no land intended for community use at all. Even accepting some economy of scale and that the majority of homes will be unsuitable for children, it is difficult to see how this would be sufficient to provide room for all the infrastructure needed by the residents. An alternative approach could be to reassess the residential targets included in the options. Both the core strategy and the AAP acknowledge that meeting the minimum housing target is a tough challenge. The population of the IA will have to rise by more than a third during the next 15 years. Yet In all options the estimated number of new homes is substantially above the minimum required by the draft London Plan. In option 4 it is 700 homes above the 2,500 target. This margin seems too generous given the constraints of the site and funding. Would it be better to accept a lower, more realistic target for residential development so that land could be released for the other uses? Furthermore, although one role of the Core Strategy is to divide up the housing target between the IA and the rest of the borough, it must also include flexibility (a recurring question in the recent presubmission document) to allow changes as the strategy unfolds. A small redistribution of housing to other parts of the borough, say to areas around other underground stations, could make all the difference to the successful economic regeneration of the town centre and therefore of the whole borough. In conclusion CBHE considers that the priority of the AAP should be to develop the IA as an attractive commercial and leisure centre. Provision of new housing is an important aim but should be achieved in a way that does not jeopardise the extent or quality of the regeneration.</p>		
41	273	Picture 6.10	<p>I have lived in central Harrow for nearly 30 years. I think Option 4 is the best one. There is no point developing Harrow centre and leaving Wealdstone and Station Road as they are. What are you going to do about infrastructure though? It is naive to under-provide parking spaces with new housing as the recent Dandara proposals did. Everyone expects to have a car and for many households this</p>	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted as are the comments regarding parking, public transport provision and

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			means two. Roads are narrow and congested already. Also public transport is getting more crowded especially the Metropolitan Line so it is not just a case of saying Oh they can use public transport. The 'peak times' into town go on for much longer than they used to. We are lucky we still have people living in central Harrow. All races, all ages. This means there are people around at all hours and all days and it does not become a ghost town when the shoppers and office workers leave. Our street has a village atmosphere and people look out for one another. Whatever you do, do not destroy these micro communities.		the need to retain the character of existing residential areas
15	274	Picture 6.10	Option 4 gives the highest amount of family housing and the best prospect of improving the environment of Station Rd for pedestrians and cyclists. It will, however, only avoid problems of increased traffic congestion and pollution if new flats in Station Road are planned as a car-free development.	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted as well as the comments regarding the need for planned car-free development
42	275	Picture 6.10	Taylor Wimpey supports Option 4 as the preferred option for development (regeneration strategy); followed by Option 3 and Option 1. Taylor Wimpey does not consider Option 2 a suitable regeneration strategy. In conclusion, Taylor Wimpey supports the broad aims of this Development Plan Document but believes a number of key considerations must be made to ensure that the Intensification Area undergoes successful regeneration. This includes a flexible approach to requirements of developments to encourage development; the early release of large sites and sites being made available at below market value in order to kick start the regeneration process and a proactive approach to wider policy to encourage business and developers into the Intensification Area.	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted as well as the comments regarding flexibility
5	276	Picture 6.10	A Having reviewed each of the 4 options, our preference would be Option 4 'High Roads and Centres'. We welcome the outcomes for Harrow Town Centre that would be delivered via this option, whilst ensuring a balanced approach throughout the Intensification Area. It acknowledged that there will be a need to deliver housing numbers through a mixture of residential typologies with a preference for taller flatted developments. This is essential to ensure the best use is made of Harrow town centre's excellent accessibility and support the retail and leisure development the emerging Core Strategy seeks to achieve.	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted
12	277	Picture 6.10	Overall, Land Securities' preferred option is Option 4 (High Roads and Centres). This seeks to, inter alia, enhance the existing distinct identities of Harrow Town Centre and Wealdstone, with development opportunities along Station Road between the two. It is also considered that this option would best support delivery at key sites and could potentially generate the greatest outputs. Harrow Town Centre and Wealdstone would each maintain a "centre" status without which it is considered that there would be a real risk that the regeneration of	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted. As is the reason given for not supporting option 2.

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			Wealdstone would not be delivered. Concentrating development on Harrow (as per Option 2) would not maximise the development opportunities within and around Wealdstone, which includes a large quantum of the potential strategic development sites within the Intensification Area identified in Picture 5.1 of the draft H&WAAP. Harrow and Wealdstone are currently two separate centres that have their own distinct identities, and Land Securities is of the view that this should remain the case through the regeneration and enhancement of both centres and their environs.		
9	278	Picture 6.10	Option 4: High Roads and Centres - Under this option, we understand the distinct identities of Harrow town centre and Wealdstone are enhanced with development sympathetic to each area. Sites along Station Road are then considered for development which incorporates large scale public realm improvements. Wealdstone industrial uses are retained and enhanced and new housing will be dominated by family housing, supplemented by some flatted development. 1200 homes would be provided in Wealdstone, 600 on Station Road, 1000 in Harrow and 400 on additional and infill sites, which will deliver a total of 3200 new homes, 2800 of which will be delivered on strategic sites. 3.12 In terms of employment, under this option 1600 new jobs would be directed to Wealdstone, 400 at Station Road, 1200 in Harrow and 700 on additional sites. Overall, 3900 jobs would be provide, of which 3200 would be directed to the strategic sites. 3.13 This option received the most support as it represents a natural extension of the retail focus of the town centre further north along Station Road. The retention and enhancement of existing characters, and the creation of gateways into Wealdstone and the town centre was widely supported.	None	None
17	279	Picture 6.10	I agree with this option - It is suitable for the area	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted
18	280	Picture 6.10	Agree with option 4 - it seems well researched and sustainable.	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted
44	281	Picture 6.10	Our client considers this to be the most appropriate and sustainable Option. As such, Option 4 is strongly supported and is our clients preferred strategic Option. Option 4 would achieve the investment and development that would be achieved in Option 3, but with the additional benefit of focusing this principally on the areas with specific need. The AAP clearly sets out the significant need to improve Wealdstone, the area around Harrow and Wealdstone Station, and Station Road. This is clearly the only Option that would seek to achieve these objectives, alongside encouraging investment in to Harrow Town Centre. It is therefore the most appropriate and sustainable option, and Option 4 should therefore be implemented.	Spatial development option 4 - supported	Support for Option 4 and the reasoning is noted
31	282	Picture	Option 4: High Roads and Centres Our client considers this to be the most	Spatial development	Support for Option 4 and

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		6.10	appropriate and sustainable Option. As such, Option 4 is strongly supported and is our clients preferred strategic Option. Option 4 would achieve the investment and development that would be achieved in the Centres in Option 3, but with the additional benefit of recognising and securing the much needed improvements to Station Road. The AAP clearly sets out the significant need to improve Wealdstone, the area around Harrow and Wealdstone Station, and Station Road. This is clearly the only Option that would seek to achieve these objectives, alongside encouraging investment in to Harrow Town Centre. It is therefore the most appropriate and sustainable option, ensuring the acknowledged 'opportunity' that the important Station Road corridor offers is not missed. Option 4 should therefore be implemented.	option 4 - supported	the reasoning is noted
45	283	6.44	I do not support this option although does acknowledge that Wealdstone and Harrow are two different communities with different priorities and needs suggestion any further expansion of Station Road will erode this fact leading to a one centre if unchecked. Station Road has serious congestion issues and strengthen the links between Wealdstone and Harrow along this corridor only will only worsen this. The main obstacles to resolve congestion is the two main railway bridge of which I can not see resources being made available in the next ten years to widen or improve.	Spatial development option 4 – not supported	The reasons for not supporting this option are noted
12	284	6.44	With regard to the reference within paragraph 6.44 of the consultation document to retaining and enhancing Wealdstone's industrial uses, the comments made above in respect of paragraph 6.31 apply equally here. The retention of industrial uses can only be sought where a robust and credible evidence base exists to support this. The purpose of the AAP, in accordance with paragraph 5.4 of PPS12 is to, inter alia, deliver [our emphasis] planned growth areas and stimulate regeneration, and it is considered that the policies and proposals within future iterations of the AAP should be focused on deliverability, based on sound supporting evidence. In this context, it is considered that regard should be had to the potential for other employment generating uses on existing employment sites, particularly where they can help to cross-subsidise B-Class land uses. Such uses may include retail, although only where this can be delivered without an unacceptable impact on the vitality and viability of existing centres. It is also worthy of note that the Council's Employment Land Review (ELR) does not support the conclusion within paragraph 6.44 that the retention of Wealdstone's industrial uses will generate new jobs. The ELR identifies an ongoing decline in industrial employment (by 2,700 jobs).	Kodak site employment requirements	As Land Securities are aware the Council is working with Land Securities, the GLA and others, including local businesses, to determine the long-term economic prospects and future for the Kodak site to ensure that any consolidation of the SIL is supported by robust evidence.
56	285	6.44	Option 4. I feel that Wealdstone including Kodak site should be first for any regeneration plans	Spatial development option 4 - supported	Support for Option 4 is noted. The Council notes that the redevelopment of

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					the Kodak site is likely to be phased over a significantly long period
57	286	6.44	Option 4 because of the number of jobs	Spatial development option 4 - supported	Support and reasoning for Option 4 is noted
11	287	6.45	Don't confuse this option with tall buildings. They are not related.	Tall buildings	All of the options require some higher density development within Harrow town centre but the form this is to take is to be the subject of further consideration of the urban design analysis.
21	288	6.46	Part of the allocation area falls within flood zones 2 and 3. This should be mentioned in the Option Assessment. The SFRA should be used to inform the location of new development. This is important as the sequential approach should be used to steer development away from areas at flood risk.	Flood risk	Agreed
11	289	6.46	Not just the key sites but any site in the intensification area.	Redevelopment potential of non-allocated sites	Not agreed, not all sites need lend themselves to redevelopment. Wholesale intensification is not what it intended by the designation or the AAP but rather managed change within a defined area
12	290	6.58	Paragraphs 6.58 - 6.65 of the consultation document seek to assess the AAP options against "the strategic objectives", however it is not clear from where these Strategic Objectives have been derived. They do not correspond to the strategic objectives within the Pre-Submission Core Strategy, and they do not directly reflect the objectives for the AAP set out within paragraph 1.7 of the H&WAAP consultation document. In particular, Land Securities would query the objective at the end of page 40 of the draft H&WAAP to "Improve Industrial and Business Uses in Wealdstone." Given PPS4 and its broad definition of economic development, it is considered that "Increase Employment in Wealdstone" would be a better objective.	Strategic objectives	Noted and agreed that these should reflect the core strategy objectives
12	291	6.63	Paragraph 6.63 of the consultation document states that "all the options take into account the Strategic Industrial Location (SIL) designations in Wealdstone and to	Consolidation of the SIL	Agreed

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			<p>a greater or lesser extent encourage the continued use of designated sites for industrial and employment uses. Where justified, and to secure new employment growth, consideration will be given to consolidation of the SIL." Land Securities is of the view that this paragraph should be revised, in order to be in conformity with the emerging Harrow Core Strategy. Criterion E of Core Policy CS2 within the Pre-Submission version of the Core Strategy confirms that "the Council will consider, through the Area Action Plan for the Harrow and Wealdstone Intensification Area, the consolidation of the Wealdstone Strategic Industrial Location (specifically its function and boundary), taking account of the assessments of industrial land demand and strategic objectives for the Intensification Area." The Council has therefore committed to considering the consolidation of the Wealdstone SIL and hence it is considered that the references within paragraph 6.63 of the draft H&WAAP to "where necessary and to secure new employment growth" are unnecessary and should be deleted. The Council may also want to consider within future iterations of the AAP the extent to which the preferred option(s) take into account the Wealdstone SIL designation, in light of the Council's commitment to consider its consolidation, and following any decision taken on this.</p>		
7	292	7.0	No specific comments	None	Noted
12	293	7.1	<p>Paragraph 7.1 refers to overall targets for the Intensification Area of 2,500 new homes and 3,500 jobs, however it is noted that the employment target within the London Plan for the Harrow and Wealdstone Intensification Area is an additional 3,000 jobs. It is suggested that paragraph 7.1 is amended to ensure consistency with the London Plan targets.</p>	London Plan targets	<p>As with most things in the London Plan the Intensification Area targets are minimums and the Council, having regard to the existing local employment market considered it necessary to increase this, which has the support of the GLA and, as demonstrated, can be achieved and exceeded through all four options that were promoted.</p>
8	294	7.2	<p>Funding Paragraphs 7.2 and 7.3 mention that viability studies have been performed to examine financial support for intensification under different market conditions. In the present economic climate this is vital but there is no indication in the AAP as to the results of these studies or how the Council will change the plan and prioritise developments in the event of funding not being available. This</p>	Development Viability Assessment	<p>The Viability Study has been published and is available on the Council's website</p>

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			question is particularly important in the light of the somewhat chilling item listed under 'threats' (Section 3: Portrait of the Intensification Area): 'limited funding may place pressure on quality of development'.		
12	295	7.2	Paragraph 7.2 of the draft H&WAAP refers to an assessment of commercial viability, but this is not referenced in the relevant earlier section on this within the consultation document (paragraph 5.6). The issue of commercial viability is key, as acknowledged in the Employment Land Review, which recognises the constraints viability places on the market bringing forward employment floorspace.	Development Viability Assessment	The viability study undertaken in support of the Core Strategy by GVA also considered commercial viability. This study is available on the Council's website
57	296	7.6	At some point a new police complex will be needed. All the police stations in Borough are 19 th Century.	Police estate requirements	There is a Police estates management plan that was subject to consultation in 2007 but since this time it remains unclear whether the proposals of that plan will be implemented due to the significant constrain on public funds and the reduction in policing that is also likely to result.
12	297	7.7	Paragraphs 7.7 and 7.10 of the consultation document refer to the Intensification Area providing 150-175 residential units per year and 200 jobs per year, respectively. It is considered, for the avoidance of doubt, that it would be helpful to confirm these figures are annual averages over the Plan period.	Annual averages for strategic targets	Agreed
49	298	7.9	We support the references to infrastructure within the document but we do recommend that there should be a specific policy or sub text in the Area Action Plan on utility infrastructure, along the following lines: It is essential that developers demonstrate that adequate capacity exists both on and off site to serve development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure, including water and sewerage. In relation to water and sewerage infrastructure where there is a capacity constraint and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development. Water and waste water infrastructure is essential to any development. Where upgrades	Policy on Utilities Infrastructure	Agreed. Such detailed development management policies will be included in the preferred option for consultation in September

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			to the infrastructure are identified to serve new development it is essential that these are in place ahead of occupation, if sewer flooding to property and no/low water pressures are to be avoided.		
34	299	7.9	<p>I do not agree with the assumption that there will be an average of two net new people per home. It is well known that in Harrow and Wealdstone, households are larger than average. The local population tend to have more children than other towns in England are also more inclined to sublet rooms in their property (both officially and unofficially). An incorrect population prediction will mean that future public resources will be insufficient. Many public resources such as health, transport and primary school education are already struggling to cope.</p>	Household size	The Council agrees that the existing average household size in Harrow is around 2.64 but this is across the entire housing stock. New dwells typically show a much reduced level of household size – at around 2 per dwelling. Note that the Council will update the population projections with the latest Census information as and when this becomes available
22	300	7.11	<p>It is not clear what this policy is trying to achieve. There is a contradiction between only allowing re-provision of existing floorspace and limiting extensions to 200 sq m. In practice, there is a danger that this policy will limit any new investment along Station Road as the limits to redevelopment implied by this policy could remove any potential return on investment</p>	Clarification of requirements	Core Strategy Policy 2 is outside the scope of consideration. However the intention of the policy is to drive main town centre uses to locate in town centre sites rather than on Station Road or elsewhere in the Intensification Area
32	301	7.11	<p>I agree that it is necessary to market the IA's potential, as mentioned in 7.11 and CS2 item B. There's an aspect of the IA's potential that has been overlooked. Paragraph 4.25 mentions Harrow Town Centre's good rail and tube connections to Central London, but e corresponding paragraph 4.14 fails to mention Wealdstone's even better rail connections, not only to Euston in under 20 minutes but also to Watford, Hemel Hempstead, Milton Keynes, Northampton and even Birmingham. These links offer attractions for developing accommodation and facilities for business people and tourists wanting easy access to London without London prices. Also underplayed I feel is Harrow's role as a commuter borough. It seems sense that part of the IA development should</p>	<p>Marketing of the Intensification Area</p> <p>Connections to Watford and further north as well as central London</p> <p>Parking</p>	Agreed that Wealdstone's rail connections should be included in the marketing proposals – this was an oversight

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			<p>be for commuters, making the best of our locations. For instance residential development within some 5-10 minutes' walk of Wealdstone and Harrow stations should need less residential parking. Is there scope to combine high density compact accommodation for younger child-free commuters with affordable. Generally I'd like to see residential parking off-road in purpose blocks, with encouragement for car clubs</p>		

Appendix M – Feedback Received to the Harrow Under One Sky AAP Consultation Event

Topic	Comment	Council's Response
General Comments on Wealdstone and Nature of Development	Continue to talk with residents	Agreed. This is the initial stage in the Plan's production and the Council is committed to on-going engagement with the community about the proposals for the area.
	Dull needs to be brighten up	Agreed. The AAP seeks to promote new quality development plus make provision for new public spaces and public realm, incorporating public art and performance space
	Town centre filthy, St Ann's and St Georges	Public realm improvements to form part of the policy requirements for the AAP.
	Looking forward for more vibrant Harrow	This is one of the objectives of the AAP to ensure the town centre attracts people for shopping, leisure, recreation and living.
	Harrow town centre already developed, no change	Disagree. As set out in the Issues and Options paper, there are significant development opportunities that exist. It is not appropriate that vacant and underutilised sites remain as they are – there is already significant pressure to develop these and this is a primary driver for why we need a Plan for Harrow and Wealdstone.
	Houses need gardens, no high rise	Opportunity exists within the Intensification Area to provide a range of housing from flats through to homes. Some town centre residential development is appropriate and serves a need both in terms of accommodation but also in terms of driving a better amenity quality and evening economy within the town centre.
	Build more houses than flats and open a youth centre	See comment above re houses v flats. There is a need for new community facilities to serve the area. However, the Council's preference is for these to be multi-use facilities that all in the community can use, including youths. The key is more in the development of the right design/specification of community facility to enable it to be used for a wide range of activities – unfortunately, this is outside the scope of the AAP.
	Too many vacant buildings, need more businesses	Agreed. Serious issues with office vacancy rates within the town centre. The Core Strategy advocates an office renewal policy which the AAP will give effect to – in short, where redevelopment proposals come forward on existing office sites, the Council will seek re-provision of some of the office floorspace within a new modern building.
	Wealdstone library is great place	Agreed. Unlike many libraries, Wealdstone library is well located in the High Street and provides significant footfall for the local shops. The AAP will therefore not look at redeveloping this site or moving the existing library.
	Library should open on Wednesday and Sunday	This is a service management matter that is beyond the scope of the AAP policy document.

	Improve security in Wealdstone	Agreed. The AAP will promote enhancement to the urban realm within Wealdstone town centre, including the provision of additional CCTV. However, a more vibrant town centre environment will also assist greatly in improving natural surveillance.
	Wealdstone suitable for redevelopment	Agreed. AAP will seek appropriate proposals for redevelopment of opportunity sites within and around Wealdstone. However, the key is to understand what each site is required to contribute towards delivery of the overall objectives and vision for the area.
	Minimal housing, employment potential	Agreed that employment provision needs to be a priority. However, the industrial sector is in decline, therefore alternative employment uses need to be considered. This will require enabling development, probably residential development, to make the development of new employment floorspace viable, especially in Harrow and in the current economic climate.
	More housing	The Intensification Area will make a significant contribution to meeting Harrow's strategic housing requirement through provision for 2,500 new homes over the next fifteen years. However, also see comments above regarding the use of residential development for enabling new employment premises.
Transport	No pot holes, parked cars, better cycle routes	Pot holes is a service management matter that is outside the scope of the AAP policy document. In line with the London Plan, car parking is to be kept to a minimum especially where the area is well served by public transport such as the AAP area. However, it is acknowledged that cars use will remain high and sufficient car parking will need to be provided for new development (commercial and residential) to ensure these do not impact on local roads through increased off-street parking, which can then effect residential amenity. To achieve modal shift away from the use of a private car, especially for short journeys, the Council recognise there is a need to significantly improve conditions for pedestrian and cyclists within the AAP area.
	Better access to Harrow-on-the-Hill station, lift, escalator, ramp	This is an objective of the Core Strategy and the AAP. However, development contributions alone will not be sufficient to deliver a modern, accessible station, as well as the other improvements we wish to see in the town centre. Therefore the engagement of TfL and the Mayor for London is key to ensuring Harrow-on-the-Hill station is given the priority it deserves in future transport investment programmes.
	Clean streets?	This is a service matter that is outside the scope of the AAP policy document.
	More reliable transport	Agreed. Additional transport impact assessment is required to look at issues of existing and potential traffic congestions and then options for reducing congestion, especially where this enhances transport reliability.

	New pedestrian route across railway	The Council will investigate the feasibility of providing a new pedestrian and cycle route from the redevelopment of the Kodak site across to Tudor Road, in addition to enhancement to the current underpass.
	Night buses between Harrow and city	This is a service matter that is beyond the scope of the AAP policy document
	Traffic lights not working	This is a service matter that is beyond the scope of the AAP policy document
	Prioritise local traffic resources	Agreed. Additional transport impact assessment is required to look at issues of existing and potential traffic congestions and then options for reducing congestion, especially where this enhances transport reliability.
Green Spaces	Lots of Green in Harrow centre	Difficult to achieve and would require a compromise to be made. Given the limited undeveloped land in the town centre, to provide green space on redevelopment would require tall buildings to make this viable. However, the alternative that the Council is progressing is to green the public realm and streetscape through appropriate tree planting and enhancement to existing open spaces.
	Something interesting on odd site: small lake, greenery	This may be appropriate on larger sites outside of the town centres. Within town centres the something interesting should be the design of the building and its uses.
	Like green spaces and playing fields	See comment above re more green spaces within the town centre. However, on larger sites outside of the town centres, provision of additional open space and child play space should be a requirement of redevelopment. With regard to additional playing fields, this would require significant land requirements. Council's preference would be for new development to contribute towards enhancing the quality of existing sports fields and facilities that serve the area.
	Maintain green spaces	The maintenance of green space is a service matter that is outside the scope of the AAP document.
	Better Parks	See above re potential of larger sites outside of town centres and Council's preference for qualitative improvements over quantitative gain, which would be difficult to achieve.
	More trees	Agree. Will be provided within the public realm through the Harrow Green Grid project and on private land through redevelopment proposals.
	Sort out foxes	This is a matter that is outside the scope of the AAP document.
	Development of recreational area and open spaces	See above re potential of larger sites outside of town centres and Council's preference for qualitative improvements over quantitative gain, which would be difficult to achieve.
Site specific suggestions	Old houses on Pinner Road should be redeveloped	Difficult as would require significant site assembly. However, the AAP should include policies against which to assess the suitability of such proposals should they be promoted by the individual landowner.

	Small houses on Herga Road and Mason's Avenue should be redeveloped	See comments above
	Redevelop Harrow Leisure Centre	Agreed. The Council has been considering proposals for the refurbishment or replacement of the Leisure Centre given its age and current running costs. As yet, a decision on the final option has not been made but is likely to be determined by what is viable.
	Open up Headstone Manor	Agreed. Improving links between Headstone Manor and Wealdstone town centre are important as is increasing the use and visibility of this significant heritage feature and community asset.
	Headstone farm, community farm	This is likely to be more appropriate outside of the Intensification Area, making use of some of the existing farm sites that are no longer commercially viable for traditional agricultural use – for which there are a number of sites across Harrow.
	Industrial land should be developed for residential	Harrow's industrial land is its employment land bank, and although the industrial sector in Harrow is in decline, there is still a requirement for new industrial and business floorspace to meet local needs and not to foreclose on future employment opportunities. Residential development on existing industrial sites needs to be viewed in the context of supporting Harrow's economic future through enabling development providing new and modern commercial premises.
	Build more schools on Kodak site	Depending on the mix and quantum of development determined appropriate for the Kodak site, it may require the provision of an additional primary school to serve the development and the surrounding area. Council is also looking at options around the expansion of existing schools serving the Intensification Area and the wider Borough, including temporary bulge classes and partial and whole school improvement projects.
Greenhill Way car park	<u>Suggested uses</u> : Shops, Café & Community uses	This mix of uses all seems reasonable, although an element of residential development (most likely above any new retail shops) may be required to make other elements of the scheme viable.
Kodak site	<u>Suggested uses</u> : Homes (4), Leisure and Sports, Shops (3), Café (3), Community uses (2), Office (2) & Business (2)	The Council could support such uses but with a caveat that the provision of shops (retail) did not compete with retail trade in Wealdstone (i.e. have the potential to undermine regeneration efforts) and that the office offer (type and quantum) did not compete with Council's objectives to renew the office market in Harrow town centre. The Council agrees that the Kodak site is suitable for the provision of homes, helping to secure a mix of housing choice within the Intensification Area. However, any residential development could only be justified through an enabling argument in support of the provision of new employment floorspace on the site, with the quantum of housing being limited to that required to deliver the new employment floorspace.

Old Post Office site	<u>Suggested uses:</u> Office (2), Business (2), Homes (2), Leisure and Sports, Shops & Café.	Being a large prime town centre site, the Council agrees that a wide mix of uses could be provided on this site, including all of those suggested.
Lyon Road	<u>Suggested uses:</u> Homes (2), Community uses (2), Office (2), Business (2). Leisure and Sports, Shops (2), Café (2).	As above, although with limits to retail given the site is not within a designated shopping frontage of the town centre.
What new development facilities would you like to see in the area	Free parking to encourage shopping.	While levels of public and private car parking within new schemes or to serve the town centre will need to be addressed through the AAP, whether such parking is made free is a service matter and outside the scope of the AAP.
	Enclose outdoor section of the town centre.	The option has been considered under previous studies of urban realm enhancements within the town centre. However, the costs would be prohibitive and the Council would prefer to focus on the creation of new areas of public realm over the plan period of the AAP.
	Exercise areas. Cycling paths	Agree that both should form part of the AAP. However, most exercise areas are provided within a park environment, therefore provision may need to be made within one or more parks that neighbour the AAP area rather than within it.
	Affordable family housing, housing for young people	The objective to deliver a significant portion of the borough's strategic housing requirement within the Intensification Area, means that if the Council want to deliver upon the Core Strategy target of 40% affordable housing from all sources, development within the AAP must make a contribution towards affordable housing provision. Flatted schemes within the town centres provides a housing choice that young people and sharing professionals would find attractive.
	Theatre, Sport track	The provision of a theatre has both short and long term financial viability issues. While the Arts Centre in Hatch End may seem removed from most of the Borough, including the Intensification Area, the fact that there are excellent public transport facilities serving the area, means residents are able to access a significant and diverse number of world class theatres, including those catered more to local productions. There is already a sports track at Bryon Recreation Ground however, a better option to upgrading this facility may be to seek greater community use of the existing world class track facilities provided at Harrow School, which is as easily accessible to most of the Intensification Area and Byron Recreation Ground is.

Appendix N – Public Notice for the AAP Preferred Option Consultation document run on 12th January 2012

Thursday, January 12, 2012

PUBLIC NOTICES

Public Notice

Harrow Council

Local Development Framework Consultation

Public consultation pursuant to Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended by Regulation 2 of the Town and Country Planning (Local Development) (England) Regulations 2008.

Harrow and Wealdstone Area Action Plan: Preferred Option

The Harrow and Wealdstone Area Action Plan is being prepared as part of Harrow's Local Development Framework. The 'preferred option' document has been prepared jointly with the Greater London Authority and follows on from last year's 'issues & options' consultation. It contains new detail on how the Council expects specific sites within Harrow and Wealdstone to be developed and policies for the consideration of planning applications in the Area. The Plan identifies capacity to develop at least 2,965 homes and create 3,380 jobs over the next fifteen years.

Notice is hereby given that public consultation on the above mentioned development plan documents will run from Thursday, 12th January until 5pm on Thursday, 23rd February 2012. The document can be viewed online at: <http://harrow-consult.limehouse.co.uk> and copies have also been placed in the Borough's libraries and in the duty planner office at Harrow Civic Centre. Comments can be sent by post or e-mail to:

Planning Policy Team,
Room 301,
Harrow Council,
Civic Centre,
Station Road,
Harrow HA1 2XF
Tel: 020 8736 6084

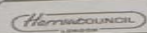
Email: ldfconsultation@harrow.gov.uk

Representations must be received by 5pm on Thursday 23rd February 2012.

Officers from Harrow's Local Development Framework team will be holding drop-in sessions at the times and locations set out below. The sessions will provide the opportunity to view copies of the Plan and ask any questions about it to members of the team.

Venue and Address	Date and Times
Harrow Civic Centre Station Road, Wealdstone, HA1 2XF	Monday 30th January 9:00am to 1:00pm
Harrow Civic Centre Station Road, Wealdstone, HA1 2XF	Friday 3rd February 1:00pm to 5:00pm
Harrow Museum Headstone Manor, Pinner View, Harrow, HA2 5PX	Saturday 4th February 12:00pm to 3:00pm
Wealdstone Healthy Living Centre 38-40 High Street, Wealdstone, HA3 7AE	Monday 6th February 10:00am to 2:00pm
St. George's Shopping Centre St. Ann's Road, Harrow HA1 1HS	Tuesday 7th February 2:00pm to 6:00pm
Harrow on the Hill Station Entrance College Road, Harrow, HA1 1BB	Thursday 9th February 4:00pm to 7:00pm
Gayton Library Garden House, 5 St. John's Road, Harrow, HA1 2EE	Saturday 11th February 10:00am to 2:00pm
Tesco Supermarket Station Road, Harrow, HA1 2TU	Tuesday 14th February 2:00pm to 6:00pm
St. Ann's Shopping Centre St. Ann's Road, Harrow, HA1 1AS	Wednesday 15th February 2:00pm to 6:00pm
Harrow & Wealdstone Station (platform bridge) The Bridge, Wealdstone, HA1 1TW	Thursday 16th February 4:00pm to 7:00pm

Andrew Trehern
Corporate Director, Place Shaping
On Behalf of the London Borough of Harrow



Appendix O – Notification Letter on the AAP Preferred Option Consultation document



Place Shaping
Andrew Trehem
Corporate Director

12th January 2012

Dear Sir or Madam,

Harrow & Wealdstone Area Action Plan: Preferred Option Consultation 12th January to 23rd February 2012

In May last year I invited you to participate in the first stage of public consultation on the preparation of an Area Action Plan (AAP) for the Heart of Harrow. At that stage the Area Action Plan was presented for consultation as a series of 'issues and options'. The Council received 295 comments about the Plan from 57 consultees. The majority of comments supported option 4 (High roads and Centres) and this now forms the basis of the 'preferred option' for the development of Harrow & Wealdstone over the next fifteen years.

Preferred Option Consultation

The 'preferred option' Area Action Plan includes new detail on how the Council expects specific sites within Harrow & Wealdstone to be developed and policies for the consideration of planning applications in the Area. It also recognises the different character of 'sub areas' within the Heart of Harrow and the improvements that will be needed to serve the Area - including a primary school, a secondary school and a health clinic - to an estimated value of £55 million.

The preparation of the 'preferred option' Area Action Plan has been informed by a number of studies and reports that, together, make up the Harrow LDF evidence base. All of the documents comprising the evidence base can be downloaded from the Council's website and are available for inspection, at Harrow Civic Centre, as part of this 'preferred option' consultation.

How to get involved

The 'issues and options' consultation in May last year had a real influence on how the Area Action Plan has been progressed, and now that the Plan is really starting to take shape I am writing once again to invite you to participate in this 'Preferred Option' consultation. The consultation will last for a period of six weeks, ending at 5pm on **Thursday 23rd February**.

Copies of the 'preferred option' Area Action Plan are available to view and borrow from all of the Borough's libraries, and further reference copies are available in the duty planner office at the Civic Centre, Station Road, Harrow. If you would prefer to download an electronic copy of the Plan, you may do so via Harrow's online consultation portal or via the Council's website:

Harrow Council, Planning Department, P.O. Box 37, Civic Centre, Station Road, Harrow, HA1 2JY
tel 020 8736 6069 email info@harrow.gov.uk web www.harrow.gov.uk

<http://www.harrow.gov.uk/heartofharrow>

<http://harrow-consult.limehouse.co.uk/portal>

In addition, officers from Harrow's Local Development Framework team will be holding drop-in sessions at locations throughout the Intensification Area during the public consultation period. The sessions will provide you with the opportunity to view copies of the Area Action Plan and ask any questions about the Plan to members of the team. Details of the events will be publicised on the above websites and are listed below.

You may send your response by email to ldfconsultation@harrow.gov.uk or by post to:

Planning Policy Team, Room 301,
Harrow Council, Civic Centre,
Station Road, Harrow, HA1 2XF

What happens next?

Once the consultation period has closed, the Council will take into account all comments received and will revise the document before a final, formal round of 'pre-submission' consultation later this year. Following the pre-submission consultation, the Area Action Plan will be submitted to the Planning Inspectorate for an independent Examination in Public to determine whether it is legally compliant and 'sound'. More details about legal compliance and 'soundness' will be provided as part of the pre-submission consultation.

If you have any questions please do not hesitate to contact the LDF team on 020 8736 6304.

Yours faithfully,

Matthew Paterson
Head of Planning Policy
Harrow Council

Venue and Address	Date and Times
Harrow Civic Centre Station Road, Wealdstone, HA1 2XF	Monday 30th January 9:00am to 1:00pm
Harrow Civic Centre Station Road, Wealdstone, HA1 2XF	Friday 3rd February 1:00pm to 5:00pm
Harrow Museum Headstone Manor, Pinner View, Harrow, HA2 6PX	Saturday 4th February 12:00pm to 3:00pm
Wealdstone Healthy Living Centre 38-40 High Street, Wealdstone, HA3 7AE	Monday 6th February 10:00am to 2:00pm
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Harrow on the Hill Station Entrance College Road, Harrow, HA1 1BB	Thursday 9th February 4:00pm to 7:00pm
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St. Ann's Shopping Centre St. Ann's Road, Harrow, HA1 1AS	Wednesday 15th February 2:00pm to 6:00pm
Harrow & Wealdstone Station (platform bridge) The Bridge, Wealdstone, HA1 1TW	Thursday 16th February 4:00pm to 7:00pm

Appendix P – Statement of Representations Procedure for the AAP Preferred Option Consultation document

London Borough of Harrow Local Development Framework Consultation (Regulation 25)

Title of document:

Draft Harrow and Wealdstone Area Action Plan: Preferred Option consultation document

Subject matter:

The Draft Harrow and Wealdstone Area Action Plan Preferred Option consultation document has been prepared jointly with the Greater London Authority (GLA). It establishes a shared future vision for the Harrow and Wealdstone Intensification Area, and details how that vision will be delivered through policies aimed at managing specific issues and through proposals for development on specific sites.

Area covered:

The Harrow and Wealdstone Area Action Plan applies to the Harrow and Wealdstone Intensification Area boundary set out in the Draft Proposals Map (April 2011).

Period within which representations must be made:

Representations can be made over the six week publication period, beginning on Thursday 12th January and ending on Thursday 23rd February 2012.

Where has the document been made available, and the places and times at which it can be inspected:

The AAP and supporting documentation are available for inspection at the following locations:

- Council's website: www.harrow.gov.uk
- Council's consultation portal: <http://harrow-consult.objective.co.uk/portal>
- Access Harrow: The Civic Centre 1, Station Road, Harrow, HA1 2XF.
- at all Harrow Libraries (the details of which can be found below)

Address	Opening Times	Address	Opening Times
Civic Centre Reference Library Station Road, Harrow, HA1 2UU	Mon.- Thurs 9.30 – 8.00 pm Fri 9.30 – 5.30 pm Sat 9.00 – 5.00 pm	Pinner Library Marsh Road, Pinner HA5 5NQ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
Gayton Central Lending Library Garden House, 5, St John's Road, Harrow, HA1 2EL	Mon- Thurs 9.30 – 8.00 pm Fri 9.30 – 5.30 pm Sat 9.00 – 5.00 pm	Rayners Lane Library 226 Imperial Drive, Rayners Lane, HA2 7JH	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
Bob Lawrence Library 6-8 North Parade, Mollison Way, Edgware, HA8 5QH	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	Roxeth Library Northolt Road, South, Harrow, HA2 8EQ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
Hatch End Library Uxbridge Road, Hatch End HA6 4EA	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	Stanmore Library 8 Stanmore Hill, Stanmore, HA7 3BQ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
Kenton Library	Mon – 9.00 – 5.30 pm	Wealdstone Library	Mon – 9.00 – 5.30 pm

Kenton Lane, Kenton, HA3 8UJ	Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	The Wealdstone Centre, 36/40 High Street, Wealdstone, HA3 7AE	Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
North Harrow Library 429-433 Pinner Road, North Harrow, HA1 4NH	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Wed Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm		

Making a representation:

The Council welcomes comments on the AAP. At this early stage in the plan making process there is no prescribed form for how comments are to be made, however, it does help the Council to analyse comments if the response includes the part or section of the document to which each applies. The Council would also encourage people to suggest the changes they would like to see made to the document to address their concerns.

Representations can be made:

- through the on-line consultation portal at: <http://harrow-consult.limehouse.co.uk>;
- by email at: ldf@harrow.gov.uk;
- by post to: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Harrow, HA1 2UJ; or
- by fax to: 020 8424 8151

Please note that all representations received will be made publicly available.

Comments must be received by 5pm on Thursday 23rd February 2012.

Further information:

For any further enquiries, please contact the LDF Team via email ldf@harrow.gov.uk or Tel. 020 8736 6068

Appendix R – Notification Letter to Specific Consultation Bodies on the AAP Preferred Option Consultation document



Place Shaping
Andrew Treharn
Corporate Director

12th January 2012

Dear Sir or Madam,

Harrow & Wealdstone Area Action Plan: Preferred Option Consultation 12th January to 23rd February 2012

In May last year I invited you to participate in the first stage of public consultation on the preparation of an Area Action Plan (AAP) for the Heart of Harrow. At that stage the Area Action Plan was presented for consultation as a series of 'issues and options'. The Council received 295 comments about the Plan from 57 consultees. The majority of comments supported option 4 (High roads and Centres) and this now forms the basis of the 'preferred option' for the development of Harrow & Wealdstone over the next fifteen years.

Preferred Option Consultation

The 'preferred option' Area Action Plan includes new detail on how the Council expects specific sites within Harrow & Wealdstone to be developed and policies for the consideration of planning applications in the Area. It also recognises the different character of 'sub areas' within the Heart of Harrow and the improvements that will be needed to serve the Area - including a primary school, a secondary school and a health clinic - to an estimated value of £55 million.

The preparation of the 'preferred option' Area Action Plan has been informed by a number of studies and reports that, together, make up the Harrow LDF evidence base. All of the documents comprising the evidence base can be downloaded from the Council's website <http://www.harrow.gov.uk/heartofharrow> and are available for inspection, at Harrow Civic Centre, as part of this 'preferred option' consultation.

How to get involved

The 'issues and options' consultation in May last year had a real influence on how the Area Action Plan has been progressed, and now that the Plan is really starting to take shape I am writing once again to invite you to participate in this 'Preferred Option' consultation. The consultation will last for a period of six weeks, ending at 5pm on **Thursday 23rd February**.

A copy of the 'preferred option' Area Action Plan is enclosed with this letter along with a CD that contains a copy of the Sustainability Appraisal, Equalities Impact Assessment, Habitats Assessment and an electronic copy of the Area Action Plan Preferred Option.

In addition, officers from Harrow's Local Development Framework team will be holding drop-in sessions at locations throughout the Intensification Area during the public consultation period. The sessions will provide you with the opportunity to ask any questions about the Plan with members of the team. Details of the events will be publicised on the above websites and are listed below.

You may send your response by email to ldfconsultation@harrow.gov.uk or by post to:

Planning Policy Team, Room 301,
Harrow Council, Civic Centre,
Station Road, Harrow, HA1 2XF

Alternatively, you can also provide your comments using our on-line consultation portal at <http://harrow-consult.limehouse.co.uk/portal>.

What happens next?

Once the consultation period has closed, the Council will take into account all comments received and will revise the document before a final, formal round of 'pre-submission' consultation later this year. Following the pre-submission consultation, the Area Action Plan will be submitted to the Planning Inspectorate for an independent Examination in Public to determine whether it is legally compliant and 'sound'. More details about legal compliance and 'soundness' will be provided as part of the pre-submission consultation.

If you have any questions please do not hesitate to contact the LDF team on 020 8736 6304.

Yours faithfully,

Matthew Paterson
Head of Planning Policy
Harrow Council

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Harrow & Wealdstone Station (platform bridge) The Bridge, Wealdstone, HA1 1TW	Thursday 16th February 4:00pm to 7:00pm

Appendix S – Full Page Editorial Advertisement placed in the Harrow Observer



your council this week

Information provided by Harrow Council

www.harrow.gov.uk

Creating a place to be proud of



Harrow Council is inviting residents to get involved in a unique opportunity to agree what the borough looks like in the years ahead.

The Council has spent the last year working on a masterplan which maps out the future growth and development of Harrow and Wealdstone town centres.

Over the next few weeks it wants residents to get involved and help agree the final version of this hugely important document.

The draft masterplan was created following extensive consultation with residents, local businesses, community groups and developers. But, there is still time for you to get involved in shaping it.

Events are taking place across the borough until 16th February where you can come and speak to officers to find out more.

It will guide the way Wealdstone, Station Road and Harrow town centre – an area we call the Heart of Harrow – will change over the next few decades.

This area is the economic heart of the borough and is essential for the prosperity of the whole of Harrow. Its future matters to everyone who lives here.

The masterplan aims to bring millions of pounds of investment into the area, creating 3,000 jobs, building some 2,800 new homes and delivering the infrastructure needed, from parks, transport and leisure to health facilities and schools. None of these would be possible without the commercial development to fund them.

Our Keith Fery, portfolio holder for planning and economic development on Harrow Council, said:

"Supporting our town centre, local shopping centres and businesses is one of the Council's top priorities. This is an opportunity to create a place that encourages you to visit, shop, work, study and live. We want residents and businesses to help us create a vision for the future of a prosperous and thriving heart of Harrow."

The area is split into seven zones and here we give more detail on the masterplan's vision for each of them and how you can have your say.

Wealdstone West

This area includes two of Harrow's longest established areas of employment - CoArt and Kodak. Manufacturing on these sites has declined or stopped in recent years so neither site is expected to be used for large-scale industrial use but both will play an important role in providing employment space and job opportunities, and make a significant contribution to housing targets.

The Teacher's Centre in Cecil Road has been identified for redevelopment for a secondary school while Zoom Leisure site is earmarked for housing. Development of CoArt must recognise the legacy of the art materials company Winsor and Newton and provide employment, studio space and homes.

The Kodak site off Headstone Drive could be used as an enterprise hub including workshops, housing - both flats and for families - and community use, set in new urban and green spaces.

Linked across the Kodak site by a new green corridor, the Zoom Leisure site will enable the creation of a pedestrian and cycle route all the way between Wealdstone and Headstone Manor Recreation Ground, opening up views of the manor to a wider audience.

Development of CoArt must recognise the legacy of the art materials company Winsor and Newton and provide employment, studio space and homes.

Dave Donaldson, 62, Wealdstone
"I think the plans for the Kodak site seem pretty good and as far as I can tell there's enough parking. I think that's going to be an issue. If they don't put enough parking in but as long as they do, everything else looks on the surface to be really pretty good."

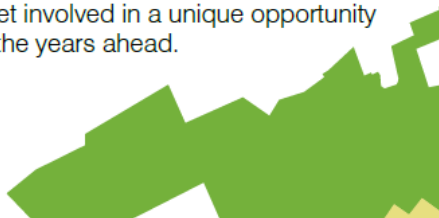


Harrow Town Centre

The borough's retail and commercial heart. Development must enhance its retail and commercial offer and provide a range of housing. We also want to create a network of quality public spaces and improve the look of the area so people spend more time in the town centre.

It is the most appropriate place for a tall landmark building for Harrow that would, importantly, provide funding for better community facilities. We also want to improve Lowlands Recreation Ground.

Key sites for development are:



Station Road

Improving this busy link between Harrow town centre and Wealdstone is a key part of the plans, encouraging development along the route, enhancing the look of the area while improving traffic and facilities for pedestrians and cyclists.

Higher density development would be allowed along Station Road but would reduce significantly in surrounding residential areas.

Improvements to H Hindes Road/Elm Grove Road junction would help create a 'green corridor' linking to open space in Kenyon and Harrow recreation grounds.

Greenhill Way car park and Harrow Civic Centre have been identified for mixed use including housing. Other developments in Station Road should provide shops, services and business premises.

The eventual redevelopment of the Civic Centre could also create new public space opposite Harrow Mosque.

Catherine O'Grady, 20, South Harrow
"It's a good idea to make the Station Road area look nicer. Jobs are also needed in the current climate so development is a good idea"



Harrow Western Gateway

The zone between the main shopping centre and surrounding residential area. Much development is already underway, including Neptune Point. Completing Bradstone

House and renewing the outdated offices at the western end of College Road are a key part of the plans, and will improve the view for people entering the town centre.

Wealdstone Central

We want to improve shopping and give it a more local feel by encouraging more specialist shops and by focusing shopping activity around the Headstone Drive, High Street, Canning Road junction. We also propose a new supermarket on the car parks off Palmerston Road and Gladstone Way.

Improving the look of the area, particularly around the station and under the railway bridge in Headstone Drive is a priority. There are also areas where taller buildings could be built, especially around the Palmerston Road and George George

Way Junction.

New buildings would be accompanied by improved signage, planning and lighting.

Simon Gavriel, 36, Wealdstone

"The plans look good. Anything to make the area more appealing and welcoming would be great. It would be nice to see a large Morrisons or Sainsbury's somewhere around the Kodak site to give residents another option."



Wealdstone East

The zone east of Station Road and George George Way. It is a dynamic mix of Victorian housing, industrial and business estates, and civic facilities.

The biggest opportunity in this zone is the Leisure Centre, which covers an area of nearly five hectares. Whilst retaining the Leisure Centre complex including Byron Hall and the gymnastics school, the masterplan proposes to make better use of the site for housing and public space.

At the Civic Amenity site, we also propose improvements for nearby residents by forming a new, undercover waste management facility.

Harrow Town Centre East

Like the Western Gateway, the eastern area sits between the busy shopping area and surrounding suburbs. There are two key sites:

- Lyon House/Equitable House
 - Car park and former library in Gayton Road.
- The masterplan proposes quality redevelopment to create housing, business and community use and to open up better views of Harrow on the Hill. Lyon House would help create a new town square and provide space for shops, a health center and offices.

Terry Butcher, 45, works in Harrow Town Centre

"The plans for the town centre sound ok. As long as they stay within budget, improve the area and bring more people into Harrow, they can only be good for businesses. I would like to see a roof over St Ann's road because when it rains it clears the trade from the area."



How to get involved

The Council wants to hear your views on the masterplan. See the 'preferred option' Area Action Plan online at www.harrow.gov.uk/heartharrow where you can also comment in a special blog. Copies of the document are available in all of the borough's libraries, or from the duty planner office at Harrow Civic Centre.

You can comment on the plan at harrow-consult@mehouse.co.uk or by post to: Planning Policy Team, Room 301, Harrow Council, Civic Centre, Station Road, Harrow, HA1 2KJ.

The deadline for responses is Thursday 23rd February.

In addition, officers from Harrow's Local Development Framework team will be holding drop-in sessions at the following venues in the coming weeks:

Harrow Civic Centre	Friday 3rd February 1pm to 5pm
Harrow Museum Headstone Manor, Pinner View	Saturday 4th February 12pm to 3pm
Wealdstone Healthy Living Centre 38-40 High Street, Wealdstone	Monday 6th February 10am to 2pm
St. George's Shopping Centre St. Ann's Road, Harrow	Tuesday 7th February 2pm to 6pm
Harrow on the Hill Station Entrance College Road, Harrow	Thursday 9th February 4pm to 7pm
Gayton Library Garden House , 5 St. John's Road, Harrow	Saturday 11th February 10am to 2pm
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Harrow & Wealdstone Station (platform bridge)	Thursday 16th February 4pm to 7pm

What happens next?

Once the consultation period has closed, the Council will take into account all comments received and will revise the document before a final, formal round of 'pre-submission' consultation later this year. Following the pre-submission consultation, the plan will be submitted to the Planning Inspectorate for an independent examination in public to determine whether it is legally compliant and 'sound'. More details will be provided as part of the pre-submission consultation.

Appendix T – AAP Colour Booklet



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n opportunity...

...a once in a lifetime chance to create
a place to be proud of.

2012



Harrow Council is creating a masterplan which maps out the future growth and development of Harrow and Wealdstone town centres. So far we have spoken to residents, local businesses, local groups and developers. Our masterplan will guide the way Wealdstone, Station Road and Harrow Town Centre change over the next few decades.

This area is at the economic heart of the borough and is essential for the prosperity of the whole of Harrow. Its future matters to everyone who lives here.

The masterplan aims to bring millions of pounds of new investment into the area, including new businesses, creating 3,000 jobs, building 2,800 new homes and delivering the infrastructure needed from parks, transport and leisure to health and schools. None of these would be possible without the commercial development to fund them.

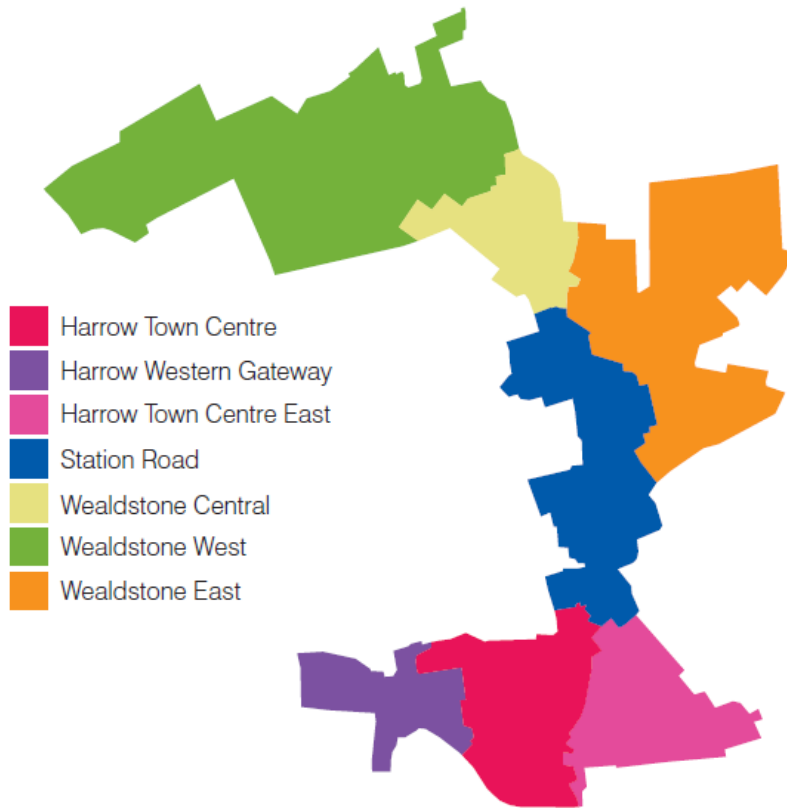
This is an opportunity to help create a place that encourages people to visit, shop, work, study and live.

Opposite is a map which splits the area into seven zones. On the

following pages we describe in more detail our plans for these zones.

We want to know what you think. There is still time to influence the masterplan and have your say. If you would like to find out more you can read a copy of the draft Area Action Plan at your local library, the Civic Centre in Station Road or by downloading the document by visiting www.harrow.gov.uk/heartofharrow

Please send any comments by email to: ldfconsultation@harrow.gov.uk or by post to: Planning Policy Team, Room 301, Harrow Council, Civic Centre, Station Road, Harrow, HA1 2XF



Harrow Town Centre

The town centre is the retail and commercial heart of the borough – Harrow's 'West End'. It typifies the borough's Metropolitan character as an exciting place to live, work and shop. As such, any development would need to enhance the town centre's retail and commercial offer and provide a range of contemporary housing. We also want to create a network of quality public spaces and improve the look of the area to encourage people to spend time in the town centre.

It is the most appropriate place to locate a tall landmark building to put Harrow on the map and create funding for better community facilities. The plan sets out the importance of the bus station and accessibility to Harrow on the Hill Station. We also want more people to use Lowlands Recreation Ground by making it more attractive and capable of hosting special events and activities.

Key sites considered for development are:

- Dandara site (former post office site) in College Road
- Transport for London's car parks to the south of Harrow on the Hill Station
- Land at Havelock Place

Development of these three sites will contribute to the Borough's housing targets, improve the shopping offer and enable the development of new community spaces.

- Harrow Town Centre
- Harrow Western Gateway
- Harrow Town Centre East



Harrow Western Gateway

The Western Gateway is the zone between the town centre's shopping centre and the surrounding residential area. Much of the development is already underway, including Neptune Point. The plan seeks to stimulate the completion of the Bradstowe House development. It also earmarks the block of offices at the western end of College Road for renewal as commercial offices to improve the view for people entering the town centre.

There are plans to improve walking and cycling routes into St Ann's and College Road, including the underpass at Roxborough Bridge and improvements to traffic flow at the Pinner Road junction.

Harrow Town Centre East

Like the Western Gateway, the eastern area of the town centre sits between the busy higher density shopping area and surrounding suburbs.

There are two key sites for development; Lyon House/Equitable House and the Gayton Road site, including the former library and car park.

The masterplan proposes high quality redevelopment to create housing, new business and community use, and to open up views of Harrow on the Hill to the south. Whilst Lyon House would help create a new town square and provide space for shops, a health centre and new offices.

What do you think? Let us know



Station Road

An important part of the masterplan is to improve Station Road - the link between Harrow town centre and Wealdstone. This will mean encouraging development at key sites along the route, enhancing the look of the area and improving traffic flow at busy junctions.

Improvements will be made to the Hindes Road and Elmgrove Road junction to create a 'green corridor', which will link the area to open spaces in Kenton and Harrow recreation grounds.

Greenhill Way car park, Tesco and Harrow Civic Centre have been identified for development. Other developments in Station Road are intended to provide local shops, services and business premises at ground floor level.

The eventual redevelopment of the Civic Centre will provide the opportunity to create new public space opposite Harrow Mosque. The redevelopment will also involve moving the reference library to a new space in Harrow town centre.

Wealdstone Central

We want to improve the retail offer and give it a more local feel by creating more specialist shops and refocusing shopping activity around the Headstone Drive, High Street and Canning Road junction. We also propose a new supermarket on the car parks off Palmerston Road and Gladstone Way, which will incorporate replacement parking.

We plan to improve the look of the area, particularly around the station and under the railway bridge in Headstone Drive. There are also a number of areas where we can build some taller buildings especially around the junction of Palmerston Road and George Gange Way, which should give Wealdstone a more distinct identity.

New buildings would be built alongside improvements to the area including new signage, lighting and planting.

tear here

- Station Road
- Wealdstone Central
- Wealdstone West
- Wealdstone East



Wealdstone West

This area includes two of Harrow's longest established employment areas - ColArt and Kodak. Neither site is suitable for large scale industrial use but both can play an important role in providing modern employment space and local job opportunities, as well as making a significant contribution to the borough's housing targets. The Zoom Leisure site and the Teachers' Centre in Cecil Road have also been identified for development.

Any development of ColArt should recognise the legacy of the former art materials company Winsor and Newton, as well as providing employment, studio and residential living.

The Kodak site off Headstone Drive could be used as an enterprise hub including workshops, housing and community use, set in urban and green spaces. The Zoom Leisure site will enable the creation of a pedestrian and cycle route to Headstone Manor Recreation Ground, opening up views of the Manor to a wider audience.

Wealdstone East

Wealdstone East is the zone east of Station Road and George Gange Way. It is a dynamic mix of Victorian housing, industrial and business estates and civic facilities.

The biggest opportunity in this zone is the Leisure Centre, which covers an area of nearly five hectares. Whilst retaining the leisure facilities on the site, the masterplan proposes to make better use of the site for housing, while opening up new opportunities for the space overlooking the park, ensuring the area feels safe and is better used during the day.

At the Civic Amenity site, we also aim to improve conditions for neighbouring residents and the appearance of the site from the railway by enabling a new, undercover waste management facility on the site, alongside the consolidation of existing depot facilities over time.

What do you think? Let us know



Freepost RLZL-GTTG-YBTG
LDF Consultation
London Borough of Harrow
PO Box 21
Civic Centre
HARROW
HA1 2UJ

Fold here

How to get involved

We want to know what you think. There is still time to influence the masterplan and have your say. If you would like to find out more you can read a copy of the draft Area Action Plan at your local library, the Civic Centre in Station Road or by downloading the document by visiting www.harrow.gov.uk/heartofharrow

Please send any comments by email to: ldfconsultation@harrow.gov.uk or by post to: Planning Policy Team, Room 301, Harrow Council, Civic Centre, Station Road, Harrow, HA1 2XF

What do you think of our plans for Harrow Town Centre, Station Road and Wealdstone?

tear here

moisten here

moisten here

moisten the glue strips, seal and post

Appendix U – Respondents to consultation on the AAP Preferred Option

ID No.	Respondent	ID No.	Respondent
1	Eileen Kinnear	30	John Orchard
2	Keith Perrin	31	David Yeaman
3	Phillip O'Dell	32	CBRE - Dandara
4	Pat Burman	33	CGMS – Met Police
5	Tom Vahey	34	Harrow Civic Residents Association
6	Jonathan Barker	35	Roxborough Road Residents' Association
7	Sharon Ward	36	Dr M Lowrie
8	E. Spencer	37	Christopher Langley
9	Andrew Reed	38	Environment Agency
10	Thames Water	39	TfL Corporate Finance – Property Development
11	PPM Plannning	40	Harrow Friends of the Earth
12	Helen Riley	41	Harrow Weald Tenants and Residents Association
13	Richard Maylan	42	Katherine and Jack Bye
14	BNP Paribas (on behalf of Post Office)	43	Penoyre & Prased LLP on behalf of ColArt
15	Mrs M Bristow	44	GVA on behalf of AIB Ltd
16	Alan Richardson	45	Kervin Fontaine-Waldron
17	Elaine Slow	46	Brian Murphy
18	Gabor Otvos	47	David Summers
19	Harrow Agenda 21	48	Helen Shorter
20	Savills on behalf of Lyon and Equitable House	49	Preston Bennett on behalf of MP&G Trading
21	Andrew Graham - Salvatorian College	50	CBRE on behalf of Land Securities

22	Hatch End Association	51	Roxborough Residents Association
23	Father McAllister	52	Harrow School - Estates
24	Greater London Authority	53	Mr H German
25	Campaign for a Better Harrow Environment	54	English Heritage
26	Governing Body of Whitefriars Community School	55	Perry Holt and Co on behalf of Aerospares
27	Russell Sutcliffe	56	Terence Frisch
28	Dr A Shah	57	Define (for CBRE – Dandara)
29	Natural England	Anon 1	Anonymous 1
		Anon 2	Anonymous 2

Appendix V – Individual Comments Received and the Council’s Response to Each

General Comments

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
3	General	I object to preferred option for the Heart of Harrow. Including Station Road in the plan will only eventually lead to the one centre option with Wealdstone losing its distinct character as identified in the original document. This would severely impose a loss of amenity to my constituents.	Preferred Option	The selection of the preferred option was a decision made by the LDF Panel at its meeting of 26 July 2011 having considered and assessed the responses received to the AAP Issues and Options document, which was subject to public consultation from 13 May 2011 to 24 June 2011. No change
5	General	There are some good ideas being offered up but if there are insufficient parking facilities much will be lost. Crime is the number one concern now, this is a very recent development with a huge influx of Somalis threatening and robbing people in Wealdstone and Harrow weald also a lot of anti social behaviour on the buses, that is why people prefer to use their cars.	Parking and crime	Where sites to be allocated currently include public car parking facilities serving the town centres or a community use, re-provision of the car parking is required as part of the development. The concerns regarding crime and fear of crime are noted, and are addressed in the Area Action Plan through job creation, the regeneration proposals for Wealdstone town centre, and the urban realm enhancements proposed across the whole area. However, matters such as anti-social behaviour on the buses etc is a much wider social issue affecting all of London and is, unfortunately, beyond the scope of the AAP to address. No change
6	General	I have read the information about this plan and my comments follow: Overall I welcome the proactive work of Harrow Council in creating an Action Plan which will act as a template to encourage developers to put resources into following an overall and cohesive plan and also contribute some costs towards the overall development at a time when Council money is in short supply.	Overall principles	Support is noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
8	General	<p>Would prefer buildings to be no taller than existing buildings in Harrow.</p> <p>Support in principle improved walking and cycling routes and green corridors.</p>	Tall Buildings	<p>Building taller or more intense use is required to encourage developed sites to come forward for redevelopment. Much work has been undertaken to ensure the building heights proposed are suitable to their immediate location and add to rather than adversely impact upon the character of the area. Further changes have been made to strengthen the policies on building heights.</p> <p>Support noted for improved walking and cycling routes.</p>
9	General	Please define what the new description “Heart of Harrow”, is it the Intensification Area?	Definition	The Heart of Harrow is the name or branding the Council has given to the Intensification Area designation. The Council has amended the introductory paragraphs to clarify this.
9	General	Please note Harrow on The Hill has no hyphens. Harrow-on-the-Hill Station has hyphens. Please be consistently correct.	Terminology	Noted and amendments made
14	General	<p>POL has a number of holdings within the Borough. It is with regards to the following properties that we submit these representations:</p> <ul style="list-style-type: none"> • Wealdstone CO (Counter) / OFF (Office), 4 – 12 Headstone Drive, Harrow, HA3 5QL; and • Harrow CO, 14 – 16 College Road, Harrow, HA1 1BE. 	Opportunity sites No. 6 & 18	Post Office Limited’s existing land holdings within the AAP area are noted.
19	General	<p>Paras 1.1.1 & 1.1.3 refer to the London Plan and the borough's future housing needs. 2.2.1 states that Harrow is already densely populated for an outer London borough, and London's immediate post-war policy was to reduce London's population by creating new towns. Yet national and wider London policy requires us to accommodate 2800 new homes or 4160 new residents. Simultaneously Caroline Spelman and the Environment Agency are identifying a serious water supply problem for all of the Southeast, and Govt. spokesman Lady Wilcox (February 15) refers to the need to spread economic activity more uniformly across the whole UK. London and the SE are already experiencing congestion on roads and public transport (which has adverse consequences for pollution, comfort, people's leisure-time), at a</p>	Overall principles	<p>Beyond London, the recently abolished regional planning system sought to provide a national policy of more uniform development. In the absence of such a national policy, and regional plans to implement it, it is left to the market and to businesses and individuals to determine where best for them to locate.</p> <p>Within London, the London Plan provides the strategic framework for reconciling, insofar as possible, requirements for and capacity to deliver new housing and growth across the capital. As a consequence of this</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
22	General	<p>time when more remote parts of the country are losing population. Modern communications (internet, email, video-conferencing, home-working) enable businesses to operate effectively without needing to be in any particular location. The drift to the SE damages both the SE which receives it and the other parts of the country which lose it. Harrow's proposed expansion accommodates this drift - we should be seeking a more rational national policy of uniform development across the UK. (West Germany before 1989 had no single centre of economic activity and greatly benefitted from this).</p> <p>On this occasion we have been unable to examine the consultation document in depth but would like to support the proposals overall in principle. We consider the plans to improve the Heart of Harrow</p> <p>are imaginative and should put Harrow on the map as an important place to visit as well as to reside in</p> <p>We like the idea of the two centres of Harrow and Wealdstone being joined by an attractive, vibrant Station Road and also that the centres will be landscaped with small areas of greenery and trees.</p> <p>Of course, the devil may be in the detail and as residents and businesses on the outskirts of Harrow, we will keep an eye on the progress of these phases of development and will be particularly concerned about height of buildings, the quality of design, the congestion of traffic and parking and the variety of leisure and retail provision.</p>	Overall principles	<p>strategic, plan-led approach, housing need may not be met in the borough from which it arises. This is certainly the case in Harrow where projections for household growth significantly outstrip the Borough's identified capacity to sustainably accommodate housing development over the plan period.</p> <p>In a London context, Harrow's contribution to meeting London's housing needs is modest and recognises the borough's limited availability of developable land.</p> <p>No change</p> <p>General support is noted as are the concerns regarding building heights, design quality, congestion and leisure and retail provision.</p>
24	General	<p>The opening policies of the Area Action Plan set out the overarching principles for the three main spatial components of the intensification area: Harrow metropolitan town centre, Station Road and Wealdstone district centre. These policies place particular emphasis on high quality design, stimulation of employment growth and delivering a favourable mix of uses to</p>	Overall principles	Support is noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
25	General	<p>promote regeneration and respond to housing need. The proposed approach to managing growth within the intensification area positively builds on the principles established following the issues and options consultation, and is strongly supported.</p> <p>We have studied the Preferred Option Consultation Document. We are in agreement with much that it says in terms of regenerating the two town centres - eg careful attention to the design of new buildings, emphasis on the preservation and creation of new views, infilling of unsightly gaps and general streetscape improvements. However we do have a number of comments.</p> <p>The proposed major developments in the Intensification Area will inevitably have an adverse effect on those already living nearby. This fact is scarcely recognised in the consultation document. We suggest that chapter 4's objectives should include the protection of these residents and show the measures to be taken to achieve this.</p>	Objectives	<p>As set out in the accompanying sustainability assessment, the proposed major developments will have positive impact on the immediate area and those living within it, especially in terms of the regeneration of Wealdstone town centre, the improved amenity of Station Road, and the creation of a more prosperous Metropolitan town centre. Across the whole of the Heart of Harrow, new development will contribute to modern business premises – aiding local employment; secure improvements to local parks and open spaces; improve the quality of the public realm; provide new community facilities; and enhance the quality, accessibility and capacity of public transport. Adverse impacts, such as the bulk and scale of new development and traffic congestion are to be mitigated through quality design, the management of building heights, and through transport and road network improvements.</p>
25	General	<p>We remain unconvinced of the need for tall buildings in the two town centres, though we realise we may need to accept single landmark building in Harrow town centre of appropriately high architectural quality and design to justify its height. There are plenty of examples of award winning, low rise, high density housing in other London boroughs and there is a strong groundswell of opinion against tall buildings amongst Harrow residents. We shall return to this subject at a later date.</p>	Tall buildings	<p>No change</p> <p>Building taller or more intense use is required to encourage developed sites to come forward for redevelopment. Much work has been undertaken to ensure the building heights proposed are suitable to their immediate location and add to rather than adversely impact upon the character of the area. Further changes have been made to strengthen the policies on building heights.</p>
28	General	<p>I welcome the Area Action Plan's statements about improving pedestrian and cycle facilities. A massive increase in cycling to levels seen in Dutch cities will have profound benefits for health, air quality and the local economy. This can only be achieved if</p>	Pedestrian and cycling facilities	<p>Support for improving the pedestrian and cycling facilities is noted.</p> <p>Northwick Park Roundabout is being modelled as part of the TfL modelling exercise. Appropriate mitigation</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>roads are built with high quality cycle facilities which are convenient, safe and easy to understand, as per the Dutch guidelines.</p> <p>All new pedestrian routes through the development sites should also be accessible to cycles (either a segregated cycle path if there is space, or a shared use path). The Northwick Park Roundabout is outside the scope of this document but comprises a huge gap in cycling and pedestrian facilities in Harrow/Brent. It should be provided with humped zebra crossings with bidirectional priority cycle crossings set back 5m from each approach arm, and a segregated cycle path around the roundabout.</p>		<p>measures may be required for the roundabout that will include pedestrian and cycle facilities, with proposals being taken forward through revisions to the Council's Transport – Local Implementation Plan</p>
32	General	<p>As a general comment and to inform good practice it is suggested that references are added to the photographs within the document. Whilst some of the wider townscape photographs are useful to provide context, the value of others, such as the barn at Chapter 3, are confusing without a specific reference.</p>	Reference photos and diagrams	Agreed references have been added.
34	General	<p>Harrow Civic Residents Association (HCRA) represents more than 300 households in Rosslyn Crescent, Frogna Avenue and Woodlands Road – all three roads fall within the “intensification area” covered by the proposals.</p> <p>The association would like to express its support for the broad aims and principles outlined in the consultation document. In particular we welcome:</p> <ul style="list-style-type: none"> • Plans to upgrade the entrances and environment at both Harrow and Wealdstone and Harrow-on-the-Hill stations • Plans to provide a better retail offer in Harrow Town Centre with better quality shops • More leisure and cultural facilities and more green space • A commitment to high quality standards of architecture and design 	Overall principles	Support is noted
37	General	<p>There is no Management Overview. This omission is quite</p>	Past	<p>Section 1.3 provides the management overview in terms of timetable, delivery and implementation of the AAP.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>unbelievable.</p> <p>There is no reference to or analysis of the public debate from either earlier iterations or, the Lets Talk campaign, or, The London's Mayors Report on District Shopping.</p>	consultation	<p>Section 1.4 provided a summary of the community engagement and the results of consultation on the four broad development options previously consulted upon. As set out in paragraph 1.4.7 the analysis of the responses and how these were taken forward in developing the Preferred Option are available in the consultation report, which is available on the Council website. This analysis was much too long to include in the document itself.</p>
37	General	<p>Whilst it is clear considerable time has been spent in writing the text, the lack of designs, illustrations or, examples of the buildings which will have an irreversible impact on Harrows Street Scape, its infrastructure and impact on socio economic immigration or emigration, fails to meet expectation. There is only one illustration, page 126, which is undoubtedly not typical of the proposals. Contemporary Housing design can include ideas from Pierre Davoine to Fielden Clegg Bradley and the consultation document should at least recognise the wide interpretation developers could submit.</p>	Illustrations	<p>No change</p> <p>The Council has invested in a 3D model and is working with Design for London to input consented and proposed buildings forms that will enable 360 degree analysis. This will hopefully be made available on the Council website. Snapshots of the resultant images are proposed to be included in the final AAP to help to illustrate the changes proposed.</p>
37	General	<p>The content, which does not mention the considerable socio economic and retail changes since the plans inception in 2008, is Jargon driven and fails to meet the English Crystal Clear Standards required for public debate. For example, on page 171 Design housing to be viewed and experienced at all sides. The paragraph continues, Provide a positive relationship with the railway in terms of view and plan, is just meaningless. In addition, it is hard to recognise from some of the chapters descriptions, just where in Harrow or Wealdstone the author is standing.</p> <p>There are many good aims and objectives, including Policy statements, the difficulty are in the interpretation shown in the text which often leaves so much wriggle room, the reader could drive a bus through.</p>	Clarity of text	<p>The Council has made various amendments to the text to clarify exactly what is sought by development in each sub-area of on individual sites. Where possible, planning jargon has been removed</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
38	General	<p>The Harrow and Wealdstone AAP area contains some areas of Flood Zone 2 and 3a and b. If the current draft of the document was submitted without being amended we would not find it sound.</p>	Flooding	<p>In discussion with the Environment Agency agreement has been reached about the applicability of the 3b Flood Zone in an urban setting such as Wealdstone. Further sequential and exception testing work is being carried out to ensure the sites to be allocated are deliverable and the policies can ensure development both mitigates and reduces flooding risk.</p>
40	General	<p>Harrow Friends of the Earth welcome this opportunity to make further representations on the 'Heart of Harrow' Area Action Plan. While we remain sceptical as to whether the 'intensification area' model of development is the most appropriate one for Harrow, we are generally pleased with the current consultation document. It takes a realistic attitude to the challenges presented by previous decisions and, for the most part, makes a genuine attempt to address the need for environmental and social sustainability.</p> <p>We do not feel, though, that the document is sufficiently emphatic in pointing out the need to abandon, within the Intensification Area, a suburban mindset associated with energy-inefficient low-density housing (for the affluent, at least) and unbridled use of the private car. In our opinion, the 'Heart of Harrow' concept will only be successful if those who live or work within the Intensification Area are prepared to accept:</p> <ul style="list-style-type: none"> • car-free housing to enable high densities while avoiding high-rise and providing high-quality amenity and recreational space; • a 20 m.p.h. speed limit throughout the area; • a hierarchy of transport priorities putting the needs of people with mobility problems, pedestrians, cyclists and public transport users above those of car drivers; and • the possibility of congestion charging and/or charges for private non-residential parking. 	Modal shift	<p>While the Council agrees with the comments of Harrow Friends of the Earth, the Council considers that the AAP represents a stepping stone in challenging the suburban norms regarding car ownership and modal shift. However, the Council remains concerned that, beyond the Intensification Area, unlike much of inner London, outer West London still does not have the transport infrastructure to support and implement hard-line policies on modal shift. In particular, and despite much lobbying of Transport for London and the Mayor, outer west London is still lacking a network of fast and reliable orbital transport links. Whilst the Mayor's latest Transport Plan includes reference to the principle of an orbital transport network it contains no proposals for its implementation at this stage. Until such time as proposals are firmed up, and adequate funding committed, there has to be an acknowledgment that private car use will still be necessary in Harrow to enable our residents to access employment opportunities elsewhere in West London.</p>
		<p>Many inner London boroughs have long realised that such measures are essential if their housing and employment targets</p>		<p>No change (at this point in time)</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
46	General	<p>are to met in a sustainable way that avoids problems such as gridlocked traffic and environmental degradation. As Harrow has now decided that its inner area is to be developed in a similarly intensive way, we believe that similar action is needed</p> <p>I like the idea of connecting places together via green walkways.</p> <p>Routes for cycling need to be improved and segregated from traffic wherever possible.</p> <p>Buildings need to be built to last using sustainable materials and renewable energy whenever possible.</p> <p>A larger pedestrianised area in central Harrow would be desirable.</p> <p>Harrow on the Hill station needs modernising with lifts or escalators and modern train indicators.</p>	Overall principles	General support is noted, as is the desire for a large pedestrianised area in Harrow town centre, and the reiterations regarding sustainable building standards and the need to modernise Harrow-on-the-Hill station.
47	General	What happens to applications for development within the IA before its adoption?	Determining current planning application	Applications will be assessed using the London Plan 2011, Harrow's Core Strategy 2012 and Saved UDP Policies 2004, alongside guidance contained in the Borough's SPDs. As the AAP continues to progress through the various stages towards adoption, the policies of the AAP will be given more weight as a material consideration in the determination of planning applications.
49	General	<p>Our client remains encouraged that there is the focus on creating a Harrow and Wealdstone Intensification Area, and it is anticipated that the significant level of homes and jobs that are proposed will have a hugely beneficial effect on the area and wider Borough. Whilst these targets are ambitious, it is considered that they can be achieved through the right mechanisms.</p> <p>The AAP provides clear guidance in respect of what is expected within the four defined sub-areas. This sub-area approach is considered appropriate and a good way to ensure guided delivery of appropriate housing and jobs.</p> <p>Our client obviously supports the objectives of the indicative</p>	Opportunity site No. 7	Support for the AAP and Wealdstone regeneration noted.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
50	General	<p>masterplan for Wealdstone Central, and endorses the inclusion of their site at 37-41 Palmerston Road within Opportunity Site 07, being available and deliverable, and a site that the LPA are aware is appropriate given discussion held to date with the land-owner and their consultant team.</p> <p>The AAP acknowledges the important role that existing sites will play in delivering housing within the areas of principal focus. This acknowledges opportunities for mixed-use developments at higher densities in tall, landmark buildings will be encouraged. These sentiments are strongly supported in the context of the clear role that our client's site at 37-41 Palmerston Road, included within Opportunity Site 07, can play in significantly contributing to meeting the clear objectives of the AAP.</p> <p>We ask you to take note of this representation, and look forward to reviewing and commenting on any future iterations of emerging policy documents in due course. As such, please retain our details on the LDF database.</p> <p>Land Securities, in its role as a key landowner/developer within the Borough, welcomes the opportunity to participate in this period of consultation on Harrow Council's emerging Harrow and Wealdstone AAP and is committed to remain engaged in this process in order to ensure the preparation of a 'sound' spatial plan that delivers sustainable growth in the Borough over the plan period and beyond.</p> <p>Firstly as a point of clarification, throughout the document reference is made to 'the Kodak site' and 'Zoom Leisure site'. We would request that these references are removed as they are not appropriate in the context of the life of the AAP over the next 15 years. Zoom Leisure ceased trading in 2011 so it is no longer suitable to refer to this site as Zoom Leisure and we would suggest that it is referred to as 'Harrow View West'. Kodak is also consolidating, and has already sold some of its land to Land Securities, so we would suggest that this site is referred to as 'Harrow View East'. To ensure consistency within these</p>	Terminology	<p>Throughout the document the Council has referred to sites as they are commonly known by the local community. This is typically based on the current or previous use of the site and ensures the public can readily identify with each site being proposed. The Council is concerned that renaming sites may lead to confusion, especially where the proposed site reference is the name of the road rather than something more tangible and site specific. Experience shows that the renaming or re-branding of a site can take a significant period of time to catch on with the local community, and typically requires the redevelopment of the site to have taken place. In the context of the life of the AAP the Council is therefore more concerned with ensuring the community can connect with the proposed sites and therefore considers the colloquial site references to be the most appropriate.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
53	General	<p>representations we will refer the whole site as 'Harrow View'.</p> <p>I write regarding the Harrow and Wealdstone Area Action Plan from a long term resident of Wealdstone who has failed to see any constructive planning from Harrow Council.</p> <p>I would add that this document which we residents have been asked to consider, in the beggarly period of two weeks, raises no excitement or hope in this writer. In fact the opposite.</p> <p>Before I comment on matters from the Heart of Harrow document, may I describe why my wife and I wanted to come to Harrow to live and raise a family.</p> <p>In the 52 years I have been a resident of Wealdstone I have seen the High Street change from a village atmosphere which included a butcher who received live cattle every month, and who slaughtered and butchered them to customers tastes, a wet fishmongers who smoked his own fish and eels, and an iron monger which was a shop full of every item one could wish to find in boxes, hanging from the ceiling, or downstairs in the cellar. And many more of the same ilk.</p> <p>My road when we moved here was a neighbourly road, where a young couple like us were welcomed by our neighbours with offers "of any help needed", or "let us know if you need anything".</p> <p>A peaceful and quiet, leafy green borough with its own efficient education authority, clean safe streets at night time and a safe happy place to bring children into the world to become solid British Citizens.</p> <p>Now our High Street is a melange of Burger bars, betting shops, kebab houses, and Middle Eastern greengrocers with goods all over the pavement and pound shops to name some. There are even retail shops that contain accountants and solicitors who sell no retail goods that the shops are for.</p> <p>The houses in our street are now full of foreign people who have no wish to be neighbours. Our street, like all roads in Harrow has</p>	The deterioration of Wealdstone	<p>The concerns are noted and are shared by many in the community. Unfortunately, the days of our high streets being populated by independent butches, fishmongers, iron mongers and bakers etc are over. The retail market has changed significantly in recent years, as have shopping habits, and our high streets have struggled to cope with such rapid change. Likewise our communities are changing as noted. While many parts of Harrow still enjoy a strong sense of community, other parts do not. The AAP proposals for Wealdstone seek to address its current decline through new employment growth and improvements to the environment and standard of development. While it is hoped that such measures will go someway to fostering a more cohesive community spirit in the area, it is beyond the scope of the plan to address many of the wider social issues raised, such as neighbourly behaviour. However, it is important to note that all of the sites proposed for development in the AAP are sites with existing development on them. The adopted Core Strategy is explicit about there being no further net loss of Harrow's existing open spaces, and the AAP conforms to this.</p>
				No change

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53	General	<p>become an open car park, as all the roads in Harrow have become. My wife will not venture outside at night alone. We still suffer the same flooding to my house that has occurred for 50 years with no interest or help from the Council.</p> <p>So by now I hope you can see why I am so critical of the past 50 years of planning by Harrow Council, and have no hope raised by this new Planning dream that we are being asked to comment on. In fact the very name Intensification describes my feelings about it.</p> <p>In the past 50 years it appears that Harrow Planners have given carte blanche to developers to concrete over every piece of ground they were asked for, without the thought for energy requirements, water services or refuse disposal.</p> <p>To illustrate my point I remember the old driving centre in Alexandra Avenue was closed and sold off to developers. The allotments adjacent to Kenmore Avenue and Byron Park were closed and the Driving Centre open here. Suddenly this new Driving Centre disappeared and a Council Dump appeared and disappeared, and now, suddenly Houses will be built upon it. Green ground to concrete. Progress? I think not and I am not a greenie.</p>	Utilities capacity	<p>The concerns are noted. Both at the local and regional level, discussions have taken place with utility providers to understand limits on network capacities or enhancements required to accommodate further growth. While the Council does rely on the utility provider to confirm this, we also note that providers are regulated and are required submit and get approval for their service plans, which are to include renewed, new or enhanced infrastructure. Nevertheless, the Council is not complacent. The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to</p>

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56	General	<p>I read with interest your leaflet regarding the 'Masterplan' for Harrow's development over the next few years. It is full of fine words with very few specifics. Whilst I appreciate that a 'vision' is necessary to then evolve plans, it always seems that any consultation always results in the residents of Harrow having to put up with more and more unattractive buildings dotted around the town, that never appear to have any relation to what they have asked for need. The Council's agenda, even if foisted upon it by Central Government, always holds sway and we end up with more high rise, more non-vernacular, and identikit brutalist eyesores.</p> <p>In particular I would like to point out that as far as I am aware there is not one resident calling for a 'tall landmark building to put Harrow on the map' (if there is I really would like to meet them). By this I believe you refer to the continued obsession by Dandara, and some elements of the Council, to build a high-rise building to challenge the current landmark building of Harrow, the spire of St Mary's. Why does it need to be so tall? If you need more land for offices or flats, how about building over the Civic Centre car-park, or Kodak or Col-Art. In fact there are already plenty of empty offices in Harrow, why build more?</p>	Design standards and tall buildings	<p>repeat this again in the AAP. However, the AAP does expand on this by including policies that require new development to take a long-term view of energy and water efficiency including the creation of a district energy network.</p> <p>No change</p> <p>In the absence of a plan for growth, the Council and the community will continue to have to react to proposals by developers, who will try and set the agenda for new development in Harrow. Dandara and Neptune Point being recent examples where the Council and community have not fully supported the proposals but where on appeal, and in the absence of a wider context, the principle of development has been demonstrated through site specific evidence.</p> <p>Where decisions have already been taken, either by the Council or otherwise, this must be acknowledge in the AAP. However, the importance and need for this AAP remains. It is essential that the Council and the community begin to set out our plan for the future development and growth of this area, and not just in terms of tall buildings but in respect of the types of development and the contribution of each to the vitality of our town centre and the ability to address key issues affecting the area.</p> <p>Building taller or more intense use is required to encourage developed sites to come forward for redevelopment. Much work has been undertaken to ensure the building heights proposed are suitable to their immediate location and add to rather than adversely impact upon the character of the area. Further changes have been made to strengthen the policies on building heights.</p> <p>The Civic Centre, Kodak and Colart are already included</p>

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56	General	<p>If you really want to make the centre of Harrow a place to be proud of, why not build a new Arts complex right on that site (Dandara). A theatre, gallery, central library right next to a main transport hub would be wonderful to rejuvenate the centre of Greenhill. Swop the site with Elliot Hall and the current Arts centre in Hatch End, worth I'm sure far more to property developers even if they had to work with certain criteria laid down by the listed buildings on the site. Indeed what an opportunity to build decent homes in a lovely setting surrounded by Green Belt in Hatch End, whilst giving Greenhill and the centre of Harrow something really worthwhile right in the heart of our Borough.</p> <p>Harrow could once more be a lovely, vibrant town, please don't throw this chance away by ignoring us. We have to live with what you do.</p>	Allocate site in the town centre for community use / theatre / library / gallery	<p>as proposals site in the AAP that will make a significant contribution to housing and employment numbers.</p> <p>With respect to offices, the reasons for the high levels of vacancy are due to the current age and inefficiency of the current stock. The levels of vacancy also mean there is no market for new office development as existing rent levels are too low. The AAP proposals are therefore about office renewal.</p> <p>The AAP includes the requirement for development of 51 College Road to provide a new central library, replacing the Civic Centre and Gayton Road libraries. The full specification of the new library has yet to be confirmed but is likely to include exhibition/gallery and community meeting room spaces. There remain significant issues with the long-term viability of providing a theatre within Harrow town centre. However, options for provision are still being explored, especially through the relocation of the Council's Civic Centre into Harrow town centre and shared use of any newly created democratic space. While the Harrow Arts Centre at Hatch End is not ideally located to serve all in the borough, it does represent significant investment and continues to be well supported and heavily utilised. Until such time as proposals for new arts provision have been firmed up, the Council will continue to support and retain this important facility.</p>
Anon 2	General	24 hour surveillance re: gun and knife crime. A constant scanner at bus and tube station.	Crime	<p>The Council would support such a proposal; however this is a matter for Network Rail and Transport for London as owners and operators of these transport facilities and is pertinent not just to the AAP area but to the borough and across London. The Council will therefore continue to liaise with these organisations, as well as the MET Police, over this and other crime and safety prevention measures that could be implemented as part of any upgrade to key public transport facilities.</p>

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Anon 2	General	<p>I believe the Action Plan is stupid as do many other who live in and around Harrow. We are already over populated locally with our industrial land is being replaced by yet more flats and shops. It appears to me that Harrow Council are ashamed of the famous landmark of Harrow Hill and are trying to hide it behind shops and flats. Shame on you.</p> <p>You just ignore us. It is like the proposed developments around Harrow on the Hill station, the section 106 to provide a private (i.e. useless) bridge across the railway! It is to carry the services, that is not a benefit to the community.</p>	Objection to concept	<p>No change</p> <p>The example provided is the reason the Council considers the AAP to be essential. In its absence, development will still take place and will include site specific mitigation measures that have little relationship to wider needs of the area.</p> <p>The Council is certainly not 'ashamed' of the famous landmark of Harrow Hill. However, the Council remains convinced that the preservation and maintenance of the iconic Harrow Hill is not incompatible with development and growth of Harrow town centre, especially if supported by robust policies underpinned by sound evidence. Policy AAP8 therefore seeks to ensure development is required to enhance the setting of Harrow Hill.</p>
36	General	<p>The present version of the area action plan outlines the vision for central Harrow clearly and goes some way in explaining how it might be achieved. The emphasis on good design and creation of interconnected public realm is encouraging. However some aspects are dealt with too superficially and others need clarification</p>	Detail of text	<p>No change</p> <p>General support is noted</p>
26	General	<p>The Governing Body wishes to record its concern that a public consultation document, which includes specific references to Whitefriars Community School had not been referred to it for comment prior to publication. Experience has shown that publicly expressed proposals such as these which create uncertainty about the continued existence of a school or changes to its location, can cause inaccurate impressions, unsubstantiated rumours and have a damaging effect on the school in the local community.</p>	Public consultation	<p>Comments are noted and have been addressed through changes to text and supporting diagram for the Teacher's Centre site.</p>
20	Support for various	<p>We submit representations on behalf of Redefine International plc, freeholders of Lyon House and Equitable House, Harrow and applicants for the planning application submitted on 11 November</p>	None	<p>Support for various paragraphs is noted.</p>

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	paragraphs	<p>2011 for:</p> <p><i>“Demolition of Lyon House and Equitable House and redevelopment to provide new residential units including affordable accommodation, new offices (Class B1) and ground floor units for use for either Class A1, A2, A3 or D1 with landscaping and public realm works.”.</i></p> <p>These representations augment those submitted in January 2011 to the Core Strategy Preferred Options Consultation and June 2011 to the Issues and Options Consultation and Draft Site Allocations DPD.</p> <p>Our comments are in bold.</p> <p>In particular Redefine supports the following (paragraph references refer to the AAP): 3.3, 3.6.7, 4.3, 4.4.3, 4.5.1, 5.1, 5.1.2, 5.1.20, 5.1.41, 5.1.50</p>		
34	Design	<p>We would like to see an emphasis on carbon neutral design and, where possible, the incorporation of solar panels and wind turbines and other “green” building techniques and features, especially on large-scale developments.</p>	Sustainability	<p>The AAP forms only part of the development plan for Harrow. The new London Plan includes detailed policies regarding carbon reduction targets for residential and non-domestic buildings (Policy 5.2). It is therefore not necessary to repeat these again in the AAP.</p> <p>No change</p>
34	Public Realm	<p>Plans to enhance Harrow town centre, Wealdstone and Station Road must be complemented by regular street-cleaning and an onus on shops, businesses and landlords to maintain the area directly outside their properties. The litter-strewn area outside the Costcutter store on the corner of Rosslyn Crescent and Station Road is an example of a shabby, ill-kempt curtilage, which creates an unfavourable impression. We believe roads in mixed-use areas, such as the three roads that make up HCRA, need more regular cleaning than streets solely made up of residential properties as our three streets suffer from litter from nearby businesses, industrial properties and the higher volume of traffic</p>	Public realm	<p>The issue of on-going maintenance and street cleaning is a service matter for the Council’s Urban Realm team and is unfortunately outside of the scope of the AAP. Where applicable, the Council does take enforcement action out against premises that fail to maintain an acceptable level of forecourt cleanliness.</p> <p>No change</p>

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		and people passing through.		
34	Public Realm	The plan promises road resurfacing, and improvements to pavements in Station Road. We think this should extend into feeder roads such as Rosslyn Crescent, Woodlands Road and Frogna Avenue, where the road surfaces and pavements are badly in need of repair.	Public realm	<p>Much of the funding for the enhancement of the public realm and improvements to Station Road will come from new development. The ability to extend improvements beyond Station Road will depend on the levels of funding secured and other priorities for social and physical infrastructure provision. In the event that such funding is unable to extend to feeder roads, any new road surfacing and pavement replacement will need to be delivered through the Council's highways maintenance budget.</p>
				No change
37	Employment	There is no business plan to support statements of increased employment opportunity, no new retail markets identified to combat the decline in comparative shopping or plans to address the impact large scale building of social housing will have on retail income and its mix in Harrow or Wealdstone. It is especially worrying that the document maintains in Site Specific Guidance the creation of 2500 jobs whilst on page 66 it states efforts to secure wider use of old industrial land for employment opportunities have not been successful. Reliance on housing projects in themselves creating and developing new Local IT and small scale business in the service sector and subsequent inward investment is at odds with typical social housing project outcomes.	Employment targets	<p>The evidence base in terms of the requirement for new retail development is provided in the Retail Study (Sept 2009) undertaken by Nathaniel Lichfield and Partners: http://www.harrow.gov.uk/downloads/file/7390/harrow_retail_study_september_2009 . This highlights that the retail sector is the third largest employment sector in Harrow but is only forecast for modest growth. This evidence has been used to prepare the Local Economic Assessment, which is effectively the Council's business plan for Harrow's economic growth and is available via the following link: http://www.harrow.gov.uk/downloads/download/2793/local_economic_assessment . This further highlights that fact that Harrow Town Centre is regarded as one of the country's least risky towns and therefore less vulnerable to retail collapse/closure and best placed to withstand a weakening retail economy. Overall the AAP seeks to promote housing, leisure and entertainment uses, alongside urban realm, office and transport improvements to drive comparison retail demand.</p>
				<p>The provisions of Policy AAP15 C only apply where all other efforts to retain the existing business use on the site have been explored and exhausted. In such</p>

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37	Retail	<p>The London Mayors Report on District Shopping and, the central plank Retail forms in the development of Harrow and Wealdstone, highlights the need to be very clear how comparative shopping trends will develop and the impact this will have. Factory Outlet shopping developments in the UK and Europe are seen as one approach to mitigate internet shopping. Examples include Bicester and Freeport Braintree. Harrow is quoted as behind the curve of successful Town development such as Ealing, Watford, Uxbridge and many others. This shortcoming was made public in 2008 by The Member of Parliament for Harrow East, Tony McNulty, who was responsible for the success of Uxbridge.</p>	Retail development	<p>circumstances mixed use development proposals are considered acceptable where it is demonstrated that the new housing provides for enabling development (i.e. that it secures new employment opportunities on the site that would otherwise not be viable in either past or current market conditions). It should be noted that the new homes to be delivered through the AAP are a mix of both private market, and where viable, affordable (social) housing.</p> <p>No change</p> <p>Harrow's retail sector is only forecast for modest growth. The AAP, in line with national and regional policy, maintains the 'town centre first' principle for new retail development. With respect to the AAP, it acknowledges that other initiatives are required to support existing and new retail development in the town centres, including new housing, leisure and entertainment uses within the town centres, alongside urban realm, office and transport improvements to drive comparison retail demand. The recent Mary Portas review into the future of our high streets highlights the issue of out-of-centre malls and the inability of centres to adapt to convenient, needs-based retailing, especially internet shopping. Against this changing retail landscape, the Council considers a conservative (in terms of quantum) and flexible (in terms of adaptability to change) approach, as set out in the AAP, is advisable.</p>
37	Housing	<p>The Heart of Harrow proposals are at odds with the success of these Towns who have built social and for sale property which is both distinct and visually attractive. Harrows proposals specifically refer to flatted developments. Such developments in Harrow are already seen as eye sores and building more will not create the desire for socially mobile or entrepreneurial couples or individuals</p>	Concern over the amount and design of flatted developments proposed	<p>No change</p> <p>The London Plan, Harrow's Core Strategy and the AAP all seek high quality residential development. Sites within the AAP offer the opportunity for modern contemporary residential designed developments. The AAP proposals are for flatted development within the town centre boundaries not across the area as a whole.</p>

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		<p>to move into the area which is key to Harrow's success.</p> <p>The building of social housing with more than 3 bedrooms is contentious. There are many owner occupiers and Council House tenants whose children share a bedroom and encouraging applicants to move to Harrow and to have large families so jumping the queue will be offensive.</p> <p>A possible reason why Ealing and Uxbridge are successful is because their Planning Department, Councillors and residents have protected and complimented their street scape when setting the agenda for developing their Towns. Watford Council are zoning housing designs to compliment the area type which in turn attracts a wider range of residents, creating the social mix necessary to support retail business.</p>	<p>Concern over the creation of social housing – and who will move in</p> <p>Need to zone housing designs to compliment the area</p>	<p>It is not considered appropriate to seek family houses within the existing built-up environment of our town centres. However, across the whole of the Heart of Harrow area, the AAP seek to provide an appropriate mix of both flats and houses of a mix of sizes and tenures (private and affordable). Outside of the town centres, sites such as Kodak, ColArt, the Driving Centre and the Civic Centre sites will balance out the flatted town centre schemes through greater provision of family housing. The need for family affordable housing is well demonstrated through the existing Strategic Housing Market Assessment.</p> <p>As with the examples provided, the AAP recognises that the Heart of Harrow area is made of places with very different existing characters. It therefore divides the area into seven sub-areas, ensuring new development respects the existing or drives a new distinct urban character within each sub-area.</p>
37	Design	<p>The Heart of Harrow suggests a Metroland dimension to the proposals which, notwithstanding the flatted and high rise building design are not, could and should be the objective of the plan.</p> <p>Ironically, whilst Harrow Council is prepared to generate revenue from home owners by, for example, charging for street parking which has removed many front gardens, destroying the Metropole ambience so sought after by selective home buyers and potentially employers; no penalties are in force which has prevented the destruction of Harrows street scape by local business and residents. For example, the removal of architecturally important features creating a blandness of shop frontage and the installation of Satellite Dishes on the front of buildings, many of which are Council owned, has made Harrow look so run down and unattractive to investors and visitors alike.</p>	Attractive design	<p>No change</p> <p>The references to Metroland character are a desire to see the best elements of Harrow's suburban character maintained across the area as a whole in terms of green spaces and quality street environments but certainly not in terms of the built form, where the expectation is for new modern contemporary developments that add value and interest to an area, establishing a new 21st century Metroland character for this area. The text and policies have been amended where necessary to reinforce this desire.</p>
		<p>The boldness of the plan must be matched to market demands</p>		

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38	Flooding	<p>and, in recognising existing visual shortcomings, define imaginatively designed building which will attract the attention and visit to Harrow by investors and shoppers alike.</p> <p>We notice that your Strategic Flood Risk Assessment (Level 2 SFRA) June 2011 does not include existing built footprint within the functional Floodplain (Flood Zone 3b).</p> <p>Flood zone 3b is not suitable for highly vulnerable, more vulnerable and less vulnerable development use classes. It is also not suitable for the sequential test. This is in accordance with Table D.3 in Planning Policy Statement 25- Development and Flood Risk.</p> <p>Some of your site allocations fall within flood zone 3b (though the existing built footprints does not) you will need to carry out one of the following options before you embark on the Sequential and if necessary exceptions test for these areas;</p> <p style="padding-left: 40px;">Identify alternative sites outside Flood Zone 3b, or review your modelling and determine whether it is possible to amend your Level 2 SFRA, removing the Flood Zone 3b designation, or</p> <p style="padding-left: 40px;">add a policy stating that the built footprint and vulnerability classification of sites in Flood Zone 3b will not be increased and; safe access and egress will be provided from the site during a flood event or a suitable emergency evacuation plan will be produced following consultation with your emergency planners. The logical place to put this would be the “design considerations” section for each site in flood zone 3b. You should also reference the recommendations sheets included in your Level 2 SFRA here.</p> <p>The Sustainability Appraisal does not include reference to the Level 2 Strategic Flood Risk Assessment in the text. Mentioning the Level 2 SFRA in the evidence base is not enough. This must be amended before submission.</p> <p>Without these changes the AAP will not be Justified as it is not based on robust evidence.</p>	Flood zones 3a and b in Wealdstone	<p>In discussion with the Environment Agency agreement has been reached about the applicability of the 3b Flood Zone in an urban setting such as Wealdstone. Further sequential and exception testing work is being carried out to ensure the sites to be allocated are deliverable and the policies can ensure development both mitigates and reduces flooding risk.</p> <p>The updated recommendation sheets are referenced in the ‘design considerations’ for the relevant individual site allocations and the Sustainability Appraisal has been updated as suggested.</p>

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38	Sequential Test	<p>The Sequential Test</p> <p>The sequential and if necessary exceptions tests have not yet been carried out. I understand from your email of 13 February that you will be commissioning a Sequential test before the pre-submission consultation. This document should inform the location of development within Harrow and Wealdstone, ensuring that vulnerable uses are located in the areas of lowest flood risk. The Sequential test will also need to be referenced in your Sustainability Appraisal.</p> <p>Without addressing the above the AAP would not be Justified as it is not based on robust evidence.</p> <p>Without addressing the above the AAP would not be Effective as it may not be capable of being delivered if sites selected for development are refused planning permission due to failing the sequential test.</p>	Flood zones 3a and b in Wealdstone	<p>Further sequential and exception testing work is being carried out to ensure the sites to be allocated are deliverable and the policies can ensure development both mitigates and reduces flooding risk.</p> <p>The Sustainability Appraisal has been updated as suggested.</p>
42	Gardens	<p>There are proposals for family accommodation but we haven't seen sufficient reference to private gardens. Most families want gardens both for children to enjoy without needing close supervision and for crop growing. The latter could be catered for by provision of allotments – would there be additional space provided for them?</p>	Private gardens and allotments	<p>Developments which include family homes are expected to include provision for private gardens. All other forms of residential development are required to make provision for on-site communal amenity space and children's play space. Where there are justified reasons why the amenity standards cannot be met on site, a contribution towards off-site provision or enhancement will be required, which may include additional allotment space.</p>
45	Community Facilities	<p>I wish to strongly commend the planning team for a well thought out document which does address issues that have been missed by a number of planning authorities.</p> <p>Particularly I would like to commend on the strong intentions to preserve and extend community facilities which are so vital. However there is one aspect that appears to have been overlooked that of the need for D1h which I do not see.</p> <p>The trend in many cities is that under used churches etc are</p>	<p>Need to allocate sites for D1H facilities</p> <p>Introduce policies to</p>	<p>Support is noted. It should also be noted that the Harrow Core Strategy also includes places of worship within its definition of community facilities and includes Core Policy 1Z which resists the loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities. This is a higher order overarching policy, so it is not necessary to repeat this policy again in the AAP.</p> <p>The Council also notes that the AAP area, and its</p>

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		<p>closed and sites re-used for needed housing. This causes a dramatic shortage of D1h facilities for the growing need for places of worship, which has a knock on effect of a lower quality of life leading to problems with crime etc.</p> <p>If this need is not addressed at this level of forward planning the problems will gradually escalate. For the plan to be sustainable sufficient levels of D1h facilities must be provided. As this plan follows many of the principles of the 'London Plan' it should be noted that these issues are addressed therein for example >></p> <p>3.86 Social infrastructure covers a wide range of facilities such as health provision, nurseries, schools, colleges and universities, community, cultural (Policy 4.6), play, recreation and sports facilities, Places Of Worship, fire stations, policing and other criminal justice or community safety facilities and many other uses and activities which contribute to making an area more than just a place to live.</p> <p>My Recommendation would therefore be:</p> <ol style="list-style-type: none"> 1. Introduce policies to protect the diminishing D1 sites. Some Councils seek and maintain a list of organizations who may require facilities and when a planning application for change of use comes in they give the list to the applicant instructing them to write to all on the list advising the availability of the site. Only if it is unsuitable for all will they then consider the application to change the use from D1. This gives little work to the planning dept and is very effective. 2. On large developments ensure that provision is made to provide both general D1 and also D1h. 3. The Council should ACTIVELY assist D1 and D1h class groups who are seeking sites (not with finance but to find a site) 4. Some planners are promoting multi-use buildings to save resources. <i>This can work well with D1 but generally cannot</i> 	<p>protect the diminishing D1 sites and require provision of D1 facilities on large developments</p> <p>Provide assistance in finding sites</p>	<p>immediate surrounds, already has a significant number of dedicated places of worship representing a wide variety of faiths. These include the Central Harrow Mosque, the Harrow & Wealdstone Baptist churches, the Trinity Methodist Church, St Paul's & Holy Trinity Church of England churches, the Harrow International Christian Centre, the London Ayyapan Temple, the Wealdstone Evangelical Church, the RCCG House of Joy of All Nations, the Middlesex New Synagogue, the Shree Kutch Satsung Swaminarayan Temple, the Harrow Spiritualist Church, the Harrow & Wealdstone Progressive Synagogue, and the Catholic Church of Our Lady & Saint Thomas of Canterbury.</p> <p>While the Council does seek provision for or includes D1 uses within appropriate site allocations, these are, as suggested, for community facilities that can be used for a wide variety of activities including as a place of worship by different faith groups. Where a faith group wishes to have its own facility, they will need to purchase the site or part of the site to enable this. The Council already actively encourages faith groups to talk with us about their current and future requirements for new community facilities. We particularly welcome working with these groups in selecting sites for new facilities as, depending on the size/capacity, such facilities can give rise to adverse impacts if inappropriately located. Such site selection is not limited to one area but covers the whole borough.</p> <p>With regard to a list, the Council is required under the Localism Act 2011 to keep a 'list of assets of community value'. These are assets owned by public bodies that the community can 'flag-up' as having an interest in. Should the public body decide to dispose of an asset on the list, sufficient time must be provided to enable community groups to raise the funds to purchase it. Harrow's list of assets of community value is currently</p>

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		<p><i>work with D1h class</i></p> <p>(Can you see a synagogue and mosque share the same facility?)</p> <p>Generally each religious group must have its own centre.</p> <p>If these points are introduced into the plan then future problems will be avoided in trying to find facilities or sites after they have disappeared, as it is put in the London Plan ---- "Making an area more than just a place to live."</p> <p>I would welcome the opportunity to meet with the inspector if it would be helpful regarding the D1-h aspect</p>		being complied and will be available shortly to view on the Council's website.

Tall Buildings / Views

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
25	Building Heights	<p>We were led to believe that there would be specific guidance on this for Harrow in the AAP. However we are disappointed to note that at para 5.1.45 the consultation document merely repeats what is already in the London Plan and the Core Strategy. Certainly it promises that the AAP will provide "locally specific criteria when assessing proposals for tall buildings within the Harrow & Wealdstone Intensification Area." However the Design Considerations set out for each key site do not achieve this. For example, Wealdstone Central Design Considerations include:</p> <p style="padding-left: 40px;">“ – Maximum six storeys for main blocks – additional storeys requiring special justification based upon additional outcomes or architectural/design considerations”</p> <p>And Lyon Road Design Considerations include:</p> <p style="padding-left: 40px;">“ – The northern building may be taller than others, to provide one of the ‘special character’ buildings along Station</p>	Lack of guidance on tall buildings	The AAP Policy 6 has been the subject of significant amendment to take account of the comments made regarding building heights and tall buildings. It now provides cleaner definitions of taller and tall building, clarify the role taller and tall building are to play in delivering the spatial strategy for the Heart of Harrow, and the assessment criteria have been developed further

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Road, and to benefit from large public realm opportunity adjacent.”</p> <p>These could in no sense be described as “specific criteria”. Consequently the door remains open for developers to try and work round them.</p>		
25	Views	<p>a) We draw attention to the error on the diagram at page 51 of the consultation document. The protected view labelled as ‘Roxborough Road footbridge’ is in fact the view from the Cunningham Park entrance to Harrow Recreation Ground. The additional, though partly overlapping view needs to be shown and the labelling corrected.</p> <p>b) The demolition of the present buildings at 51 College Road will open up new views of the Hill which will have a beneficial effect on that end of College Road generally. These will need to be taken into account in the re-development of that site.</p> <p>c) We note the intention to open up roof areas of tall buildings as viewing platforms, not only for residents, but also for visitors. There are a number of issues here, including safety of the public, access to otherwise private areas etc. We suggest that the facility should apply to only one or two specific buildings and that visits might be restricted to the annual September London Open House weekend.</p>	<p>Error in diagram</p> <p>New Views potential</p> <p>Restrict public access to viewing areas</p>	<p>A new diagram has been inserted. Completed Harrow Views Assessment is now available as part of the evidence base for the Area Action Plan.</p> <p>The potential for new views to be established is incorporated into the site allocation for this site.</p> <p>Noted – this requirement has been removed on the basis of concerns with its application – however, the potential to establish them where viable will remain in line with London Plan policy.</p>
27	Building Heights	<p>The Area Action Plan aspires to recreate the past glories of Harrow when it was regarded as the ‘Capital City of Metro-land in London’. This is a worthy aim and reflects the pride that the local community has in its borough. However, the original ‘Metro-land’ was mainly low-rise residential housing with plenty of separation and open space most of which has been infilled over the years.</p> <p>Buildings of 4 storeys or more tend to look odd and out of place in and around Harrow. The older shopping centres of shops with 2 storeys of flats above them have a certain character which more modern concrete constructions tend to lack.</p> <p>Most of the high rise towers of flats build in the 60s have been</p>	<p>Restrict the height of buildings to 4 storeys</p>	<p>See amendments made to Policy AAP6 which provides a more definitive definition of taller buildings based on predominant surrounding building heights. This makes it more flexible and applicable to the local context than the application of a blanket fixed height. In addition, restricting development to a maximum of 4 storeys would not be viable, especially where the existing building may already exceed this threshold. In the context of Harrow town centre, this would effectively ‘kill-off’ any and all of the existing redevelopment opportunities identified. This therefore does not represent an appropriate or sustainable approach, and would lead the AAP to be</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>demolished because they created a disconnected society. We don't want to recreate the problems. The new development at Neptune Point already looks out of place; disrupts the ambience of the area and it is not finished.</p>		found unsound.
46	Views and Tall Buildings	<p>I would urge the Council to remove any suggestion that new developments could be more than 4 storeys.</p> <p>I have looked quickly through the consultation document and attended a talk on it. Generally I am supportive of the proposals. A vast amount of good work has gone into them.</p> <p>My main comment is that the success or otherwise of the plans lies in the detail of the implementation.</p> <p>We do not want 19-storey developments in the centre of Harrow. We need good sightlines for St Mary's, Harrow from all parts of the Borough. Just because you can't see the view from College Road doesn't mean we can have tall buildings blocking the view from other parts of the Borough.</p>	Concern over tall buildings and their impact upon the Hill	General support for the AAP is noted. With respect to the 19 storey building, the principle of this has already been accepted by the Secretary of State. See comments in respect of Chapter 5 Policy AAP6 and the amended Policy AAP6
48	Tall Buildings	<p><u>Tall buildings</u>. Developers may want high rise to make sure their projects are viable, but too many too tall buildings will change the neighbourhood unacceptably. If the building on the old Post Office site is a certain height [which seems inevitable after the Inspector's ruling], other developers should not be allowed to use this as a precedent. There needs to be a limit overall to the number and height of tall buildings. If 'Metropolitan' justifies tall buildings, Harrow is a suburb not a metropolis, in danger of losing its character with too many high rises.</p> <p>Parts of Station Road have a pleasant neighbourly character with small food shops and places to eat. 'Smartening up' could threaten this as a consequent rise in rents/prices means we will lose yet more small independent shops.</p> <p>Two areas of Harrow which seem to me to need attention are the underpass at the top of the Pinner Road, which is frightening for pedestrians, especially after dark, and the place in College Road</p>	Limit the number and height of tall buildings	<p>The AAP Policy 6 has been the subject of significant amendment to take account of the comments made regarding building heights and tall buildings. It now provides cleaner definitions of taller and tall building, clarify the role taller and tall building are to play in delivering the spatial strategy for the Heart of Harrow, and the assessment criteria have been developed further.</p> <p>Based on past experience elsewhere within the borough, the Council does not consider that the 'Smartening up' of Station Road will result in a loss of independent shop.</p> <p>The underpass is being upgraded and enhanced as a requirement of the Neptune Point development. With regard to the road network around the Bus Station, this will be considered as part of the redevelopment of the Station.</p>
			Loss of independent shops	

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		opposite the bus station where cars drive over the pavement [far worse than the traffic through the pedestrianised St.Annes Road].		
		I have lived in Grange Road, Harrow for 38 years. The document is dense so I have only touched on a few areas which cause me concern.	Pedestrian safety	
52	Tall Buildings / Views	<p>So far as tall buildings are concerned we would not wish to have any building in the town centre higher than the current highest building datum.</p> <p>The views of St Mary's on the shoulders of the Hill surrounded by the plain of Harrow around it is a significant attraction for the School and for visitors to the Hill and should be preserved. The views to the hill are very important for our image and that of the Borough. Those out from the Hill are equally important benefit for us and the community.</p> <p>In that sense we endorse the Harrow views assessment evidence base document as a valuable approach, but criticise some of its conclusions relating to tall buildings which seem to ignore its previous analysis. The views it relates to need to be preserved including their setting without interruption by tall buildings, and views from the Hill across the town centre warrant an equal level of protection.</p>	Limit height of tall buildings	The AAP Policy 6 has been the subject of significant amendment to take account of the comments made regarding building heights and tall buildings. . With respect to placing a limit based on the current highest building, this would not acknowledge the principle that the Secretary of State has already confirmed that a 19 storey building on the former post office site is acceptable. It would also fail to acknowledge that even buildings below the highest currently in the town centre, if inappropriately located would block views and result in dominance etc. See comments in respect of Chapter 5 Policy AAP6 and the amended Policy AAP6

Transport / Parking

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24	Transport	<p>Transport for London (TfL) has enjoyed active engagement in the ongoing production of this DPD and strongly supports the objectives of the Harrow and Wealdstone Area Action Plan.</p> <p>Both the GLA and TfL will continue to engage positively with the Council to refine the content of transport policy within the Area</p>	Transport policies	Support and the continued engagement of TfL is welcomed, especially in the consideration of appropriate interventions/mitigation measures to address identified capacity issues at junctions and to develop wider transport proposals to help deliver the package of transport improvements sought by the Area Action Plan

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		<p>Action Plan.</p> <p>The DPD contains an accurate overview of the primary transport issues in the area, including highway congestion, poor east-west connections, and the scope to improve bus capacity.</p> <p>The commitment to ensure that development proposals contribute to overcoming these issues is strongly supported, as is the recognition of the potential to enhance interchange facilities at Harrow-on-the-Hill.</p> <p>Following the issues and options consultation stage, TfL has been working with the Council to assess the likely cumulative impact of development at the opportunity sites within the intensification area. This process has made use of the TfL sub-regional strategic transport models, and has also considered the implications of future growth elsewhere in the borough, combined with the growth assumed within the London Plan. Based on the preliminary results of the modelling it is evident that a number of junctions within the intensification area will experience a higher level of congestion as a result of intensification. In response to this TfL is continuing to work constructively with the Council and with developers, to secure packages of appropriate interventions/mitigation measures, to support development proposals within the intensification area, and to help deliver the improvements sought by the Area Action Plan.</p>	<p>Ongoing work on transport modelling for key junctions</p>	
25	Road Traffic	<p>It is known that Intensification, or Smart Growth as it is called in North America, can reduce urban sprawl and traffic congestion outside the intensification area at the expense of extra congestion inside the area. This occurs in spite of attempts to deter people from owning cars and applying high charges to those who retain them. Congestion means that internal combustion engines, which will predominate over electric for several decades, run inefficiently and emit more carbon dioxide and pollutants. The consultation document acknowledges that Harrow suffers road traffic congestion and that a number of junctions are likely to experience increased traffic flow due to the proposed redevelopments. All</p>	<p>Congestion and the resulting impact on air quality.</p>	<p>Much of the traffic congestion affecting the Borough and the Heart of Harrow area is caused by through traffic, not by journeys that commence or terminate in the borough. While new development will add to the existing congestion, increasing road capacity is not the solution. This will only encourage greater through traffic and see any road capacity created quickly consumed. The Council acknowledges that congestion and waiting times can lead to air quality issues. Therefore, the work we are undertaking with Transport for London is looking at traffic smoothing measures that can be implemented,</p>

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		<p>residents, drivers or not breathe the polluted air, which causes an increase in breathing related illness, and ultimately an increase in death rates compared to less polluted areas. Congestion is a non linear phenomenon; a small increase in the demand for road space can lead to disproportionate increases in waiting times, causing delays to essential road users including buses, unless priority measures are implemented. Thus it would run counter to the aims of <i>Creating Growth, Cutting Carbon</i>, the Department for Transport's White Paper (January 2011). Growth is strongly related to productivity, but productivity is reduced by time wastage arising from congestion.</p>		<p>alongside a package of other soft transport initiatives to promote and facilitate modal shift within the AAP area.</p>
41	Transport	<p>HWTRA is an organisation representing Council tenants and other residents on the large Harrow Weald housing estate and other smaller estates in the area. The estate is a socially deprived area with one of the highest rates of unemployment in the borough.</p> <p>We are pleased that the Action Plan will create new jobs in nearby parts of the borough and that it should provide better access to recreational and heritage facilities at Headstone Manor.</p> <p>We are concerned, however, that insufficient attention has been paid to the impact of the proposals on traffic congestion in other areas. Our particular concern is with the Courtenay Avenue and Harrow View corridor. We hope that no development occurs there that will add appreciably to the existing level of traffic.</p> <p>The single-deck H14 buses are already overcrowded and often delayed by traffic. This service should be improved and bus priority measures introduced. We would also like to see a new cycling and walking route that avoids the main road and gives access to the Kodak site and Headstone Manor from the east. This will require a new crossing of the railway.</p>	<p>Impact on traffic and congestion</p> <p>Bus route capacity and new ped/walking route over the railway</p>	<p>Support for job creation is noted.</p> <p>The development of the Kodak site will result in impacts upon the Courtenay Avenue and Harrow View corridor. These have been modelled and appropriate mitigation measures are currently being reviewed with Transport for London and the developer</p> <p>As part of the development contributions funding will be given over to increase the frequency of the H11 bus</p> <p>The development of the Kodak and Zoom Leisure sites will see the creation of a new green link from Headstone Manor through to Wealdstone</p>
42	Parking	<p>Parking - The plans should be realistic and have provision for at least one car per household. Very few families, especially those with children would consider travelling by public transport at weekends whether it is for the weekly shop, visiting relatives or a day in</p>	<p>Have a minimum parking figure for new</p>	<p>The upper levels of the London Plan parking standards will be applied. These continue to be maximum requirements not minimums</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
42	Transport	<p>the country.</p> <p>Regarding the provision of pedestrian and cycling routes – the two modes of transport need to be separated. The legal (albeit much ignored) view is that cycling is a road activity. Unfortunately it has become common for cyclists to ignore this and to cycle on footways with little regard for pedestrians resulting in numerous accidents. Referring to pedestrians and cyclists together adds to this attitude.</p>	development	<p>Current the Council is working with Transport for London to determine appropriate mitigation measures to address congestion. The next stage of that work will be to consider the detailed scheme proposals for the roading network in and serving the Heart of Harrow and will have consideration to a range of factors including improvements to cycling and pedestrian movements</p>
47	Cycling	<p>Provisions for cyclists – this concept is referred to frequently in the document. Need to ensure that it is realistic and not just a “current vogue”. E.g. carefully determine where cycle racks should be located and quantity, weather proof etc. There are currently too many racks in the wrong places and insufficient in the right places. Are cycling provisions also child friendly?</p> <p>Allied to provision for cyclists, the document should make explicit reference to provision for mobility scooters (storage in buildings, pathways, access routes) and similarly for children’s’ buggies. Both of these “transport modes” are of increasing importance.</p>	<p>Concern over appropriateness of cycle facility placing</p> <p>Add reference to providing other storage facilities</p>	<p>As above.</p> <p>The Development Management policy, which is applicable and referenced in the AAP, already does make provision for mobility scooters</p>
52	Traffic / Parking	<p>Whilst Harrow School land does not feature within the boundary of the Intensification Area we do have some concerns as near neighbours.</p> <p>As a major land holder on Harrow on the Hill we would wish to be reassured that no additional traffic would be sent over the Hill. There does not seem to be a strategy for traffic in the document and this is a worry bearing in mind the proposed intensification of residential and commercial space.</p> <p>Parking is also a major issue on Harrow on the Hill and many roads have commuter parking which reduces the spaces for residents and visitors to the Hill thus causing further congestion and problems. Businesses in and around the high Street struggle due to the lack of parking facilities and an opportunity to provide public parking was lost when the Kings Head development was</p>	<p>Traffic impact on Harrow Hill</p> <p>Lack of parking</p>	<p>Transport for London have modelled the impact on the road network of development proposed by the AAP. The Council is now working with TfL in the consideration of appropriate interventions/mitigation measures to address identified capacity issues at junctions and to develop wider transport proposals to help deliver the package of transport improvements sought by the Area Action Plan. The end outcome sought is a no net increase in traffic impacts over the life of the plan based on the current year as a baseline.</p> <p>Parking facilities are to be reprovided as part of development proposals that currently include parking. A detailed town centre parking strategy is also to be prepared to inform of parking space numbers, usage and reasons why these are currently under of over</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>approved in its final form.</p> <p>To maximise the benefit of the heritage and tourist attractions on the Hill as well as local business, a park and ride bus service from a car park at the foot of the Hill may be a benefit.</p> <p>Parking in Harrow town centre does not seem to be specifically addressed in the document and we believe this needs further consideration or this too will worsen the situation on the Hill. We see further car parks being considered on the outskirts of the Intensification Area so that cars do not have to go to the centre.</p> <p>It is also important to us that there is an attractive and safe route for pedestrians in both directions between the Hill, the tube station and the town centre. The station complex and approach therefore need a thorough upgrade.</p>	<p>facilities</p> <p>Potential to develop a park and ride scheme</p> <p>Improve the pedestrian link to the Hill from the station</p>	<p>performing, including routing.</p>

Chapter 1

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Para 1.1.4	<p>Why should it be clearly understood that not everywhere within the boundary will be subject to intense redevelopment? There is the potential for this and the document should acknowledge that a Town Centre Design Guide clearly giving guidance on the strategy for development will give rise to greater development activity which should be encouraged.</p>	<p>Development throughout the area</p>	<p>The Council agrees that the policies of the AAP should be robust enough, and provide sufficient criteria, against which to consider proposals across the Heart of Harrow.</p>
9	Para 1.3.1	<p>Where is the guidance proposed for the entire area to ensure co-ordinated development over the whole area and not just on current identified sites.</p>	<p>Guidance for non-allocated sites</p>	<p>The sub-area objectives and the policies of Chapter 5 provide this guidance.</p> <p>No change</p>
9	Para 1.3.4	<p>If the Council places great importance on the ability of the local community to support the proposals, then why not listen to the unanimous objections to tall buildings?</p>	<p>Tall buildings</p>	<p>Through the Dandara appeal, although this was dismissed, the Secretary of State established that the principle of a tall building within the town centre was acceptable. While the policy on tall and taller buildings</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
30	Para 1.4.6	<p>The combination of Options 3 and 4 will maintain Wealdstone as a District Centre and Harrow as a Metropolitan Town Centre allowing both centres to develop their own distinctiveness and character whilst allowing for the regeneration of the Station Road corridor.</p> <p>Station Road is the only one true High Road which has the capacity to be redeveloped. Harrow View, running from the Town Centre to the Goodwill junction, with private housing and small front gardens both sides of the road has little scope for improvement.</p>	Strategic options	<p>has been amended to strengthen it further, the AAP can not overcome the 'in principle' acceptance.</p> <p>Strategic development options 3 & 4 were selected and developed further in the Preferred Option consultation document. The additional comments are noted.</p> <p>No change</p>

Chapter 2

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Chapter 2	Not enough analysis of the Town Centre problems of traffic, parking, poor quality low rise buildings, poor quality shopping, permeability etc.	More analysis needed and	The chapter is indented to provide a general portrait of the key characteristics and issues of the Intensification Area.
9	Chapter 2	More radical solutions need to be explored and previous studies reconsidered (Alsop's Station Plan).	Radical solutions should be explored	The AAP must be a realistic and deliverable plan to pass the tests of soundness. More radical solutions, prepared in more favourable economic conditions, are unlikely to be viable in the plan period.
9	Harrow town centre (page 13)	Requires more description and analysis.	Description and analysis.	This section intended as a brief portrait of Harrow town centre issues (as with the other character areas) rather than a detailed analysis.
31	2.1	Under 'Notable Institutions and Major Employers', Northwick Park Hospital and The Harrow Campus of Middx. University have been omitted, which although on the edge of the Action Area have a huge influence with regard to employee access to and from those	Reference Northwick Park Hospital and Middlesex	Noted, text amended to include reference to Northwick Park Hospital and Middlesex University (Harrow campus) within the London Borough of Brent.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		institutions.	University	
		The relationship between Northwick park Hospital, Middx. Uni. and Harrow Centre for pedestrians and public transport is abysmal and urgently needs to be addressed.	Improve linkages between the hospital/uni and harrow	
19	2.1-2.5	<p data-bbox="434 480 757 499">Harrow's rail connections</p> <p data-bbox="434 531 1218 879">Paras 2.1, 2.4.4 & 2.5.1 overstate Harrow's rail links. Accept Harrow has good access to Euston, Marylebone and by Underground (with direct services beyond the centre to Elephant and Stratford). "Other parts of the southeast" that have direct access from Harrow are Clapham Junction (with a stopping service that then calls all stations to Croydon), Tring, Aylesbury and Milton Keynes - and with the decline of Virgin services serving Watford the connectivity there to the Midlands and northwest is poor. Harrow's rail connections to Heathrow and boroughs to the south and west are limited and to boroughs to the east do not exist.</p>	Revise the statement on Harrow's Rail connections	Noted, text amended to include more specific references to rail destinations served by Harrow on the Hill and Harrow and Wealdstone stations.
19	2.2	<p data-bbox="434 906 546 925">Diversity</p> <p data-bbox="434 957 1193 1086">Para 2.2 states that Harrow's population is diverse. Agree with this, but happily this diverse population is pretty well integrated and we can expect it to continue to do so - do not need consider diversity needs to be identified as a policy objective.</p>	Remove Diversity as a policy objective	Noted. The purpose of this paragraph is to present the current picture and the degree of further change expected over the plan period.
53	2.2.2	I now skip to your plan. Chapter 2.2.2 states that immigrants will increase by 6% by the end of the plan. More water. More energy. More refuse. Your man at "the drop in" stated that the refuse recycling rate will be increased dramatically from its near 50% rate now. I fear these new Harrow residents will disappoint you over this figure by what I have seen in Harrow.	Water/energy and refuse infrastructure capacity	Noted. Policies in the London Plan and DPDs seeks to ensure that population growth can be accommodated in the most sustainable way possible (e.g. by using water and energy efficiently, supplying green energy, etc).
19	2.4	<p data-bbox="434 1326 792 1345">Access at Harrow on the Hill</p> <p data-bbox="434 1377 1200 1437">Paras 2.4.5, 2.4.6, 2.4.8 & 3.6.7 Agree the station is dispiriting - needs disabled access and access at first floor level to St. Ann's.</p>	Improved access to and night	Agreement noted.

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		St. Ann's being closed in the evenings does nothing for access from the station to the town centre. Agree there is a need for some activity in the town centre during the evenings - but not just youth culture.	time activity in Harrow town centre	
9	Para 2.4.10	The building heights along Station Road are not 4 – 5 storeys. They are predominantly less.	Amend text	Noted, text amended to refer to generally 3-4 storeys (to south).
9	Para 2.4.11	It is not good continuity, it is poor quality continuity. More descriptive analysis is required.	More analysis needed	Noted, text amended to refer to the mix of built form in Station Road and the resulting overall incoherent character.
53	2.4.16	Chapter 2.4.16 states “Small features such as the street furniture styles and the hanging baskets on the street lights suggest the local, sometimes charming quality of the place”. Is this before one smells the Kebab shops and are barged out the way by hordes of loud school children pushing their way past you on to buses. A charming feature!	None	Noted.
9	Wealdstone (page 15)	More descriptive analysis is required.	More analysis needed	This section intended as a brief portrait of Wealdstone issues (as with the other character areas) rather than a detailed analysis.
9	Transport (page 16)	This is too simplistic. Bus routes, car routes, parking areas, congestion points etc should all be described and analysed.	More analysis needed	These have been the subject of detailed modelling undertaken by TfL and it is not appropriate to include this level of detail in the AAP.
25	2.5.1	Para 2.5.1 states that there are "good to excellent public transport accessibility levels (PTAL) across the intensification area." PTALs measure only the frequency and capacity of public transport services, not physical accessibility. Any reference to Harrow on the Hill station having "excellent accessibility" is therefore misleading, due to its lack of step-free access to ticket hall and platforms. This is acknowledged elsewhere in the document, but PTALs are widely used by developers to justify buildings such as Neptune Point, which will contribute almost nothing in financial terms towards making Harrow on the Hill station fully accessible, (despite TfL being the owner of the development site!).	Harrow on the Hill station should not be described as Accessible.	PTALs is a widely recognised planning term and does not imply that physical access is inclusive. The accessibility shortcomings of Harrow on the Hill Station are already documented in Harrow's Core Strategy (2012) and Policy CS2(M) makes provision for developer contributions through the Community Infrastructure Levy in the event of specific proposals for improvements to the station. Text amended to acknowledge the continuing lack of inclusive access at Harrow on the Hill station.

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25	2.5.2	<p>Para 2.5.2 refers to "spare rail and tube capacity" This is true off peak, and of the Bakerloo and Overground as far as Queens Park at most times of day, but not the central London sections of all lines, over which many commuters from Harrow have to travel. On the Metropolitan, Chiltern and London Midland Lines, trains into Central London are extremely crowded in the morning peak and vice versa in the evening. The forthcoming Croxley rail link will also have an effect on train usage, especially at peak times. The capacities referred to are theoretical and do not take account of cancellations, delays or the fact that standing on over-crowded trains is the only option for most passengers at peak times, increasingly so with the new Metropolitan Line trains with fewer seats than the old ones. We shall comment further on this at the next consultation round, by which time the TfL study findings may be available.</p>	<p>Rail and Tube capacity findings do not reflect reality</p>	<p>Noted. The issues of 'crush load capacity planning' and of peak time congestion 'down the line' were discussed at the Core Strategy examination in public, where it was accepted that these are matters for TfL as the strategic transport planning authority for London. Harrow's Transport Study deals with the capacity of services within the Borough only and is consistent with the principle of a proportionate evidence base.</p>
25	2.5.3	<p>Para 2.5.3 quotes spare capacity on some bus routes but fails to mention that the network has serious weaknesses, for example the lack of any direct services to places such as Ealing and Park Royal, severe overcrowding of the single route serving the Harrow-Wembley corridor, and extreme slowness of routes to places such as Heathrow and Edgware.</p> <p>Bus priority measures are mentioned at various points in the AAP but they are disappointingly timid in relation to the urgent need to maintain a reliable public transport system in Harrow - e.g para 2.5.10 refers to "some bus priority improvements" and 3.6.5 to the intention to "explore opportunities to improve bus access". Harrow View (2.5.12) also needs improvements in bus priority, though it is difficult to see how this could be achieved, except by extending the dual carriageway between the Kodak factory and Headstone Gardens junction.</p>	<p>Omission of weaknesses of transport network and buses</p>	<p>The Core Strategy recognises the need for improved orbital bus links and undertakes to work with TfL to deliver this. This is a matter for the Borough as a whole, not just the Intensification Area.</p> <p>Text to paragraphs 2.5.10 and 2.5.12 amended to refer to improvements to the operating conditions of buses.</p>
19	2.5.3	<p>Harrow bus station</p> <p>Para 2.5.3 agree Harrow bus station is inadequate for the current use it has. Do not see how it can cope with an "enhanced " service with extra trips.</p>	<p>Lack of capacity at Harrow bus station</p>	<p>Noted. There are proposals for increased bus standing capacity on Kymberley Road pending a more comprehensive redevelopment of the bus station.</p>

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19	2.5.4	<p>Car ownership and car use</p> <p>Paras 2.5.4 & 2.5.5 refer to the need to encourage walking/cycling/public transport use, but recognise there is high car ownership. 3.4 describes the challenge to change travel habits and to generate more journeys by public transport, foot and bike. It is not clear whether the aim is to restrict car ownership or car use. Need to recognise that a car owner who uses public transport for his journey to work has a greater need for adequate secure parking at his home. Hitchin Way and its effect on Whitchurch Lane and the Canons Park parade show the dangers of restricting car parking space at new developments - agree the aim of making it possible to make journeys without using the car, but many journeys cannot realistically be made by public transport (see clause 2 above), so do not consider making it impossible to own a car is a realistic policy (see also para 5.8.8).</p>	Car parking – need to provide spaces in residential developments.	Part of the <i>raison detra</i> for the Intensification Area was the accommodation of development in an area well served by public transport, where parking restraint in new development can help to deliver a range of sustainability benefits. Parking for individual proposals will be assessed in this context and against the policies of the Development Management Policies DPD and the London Plan. The Core Strategy includes a commitment to prepare a Green Travel Plan for the whole of the Intensification Area.
25	2.5.8	Reference is made at para 2.5.8 to the Core Strategy Transport Audit (2010) and there is an acknowledgement that a number of local improvements could be made to ease traffic flow which might be funded by new development. Commenting on the draft Transport Local Implementation Plan over a year ago, we indicated a number of improvements that could be made at nil or very modest cost. Is there any reason why these could not be implemented, at least on a trial basis, immediately?	Bring forward some transport improvements	Noted. Immediate implementation of proposals a matter for the Local Implementation Plan; the AAP seeks to plan for the longer term improvements needed to sustainably support growth over the plan period.
25	2.5.9	<p>Para 2.5.9 refers to refinement of TfL's sub regional transport modelling report which is due this spring, including impact of increased congestion on junction capacities. We would suggest early implementation of conclusions from this work</p> <p>Even if most of the proposed population increase in the Intensification Area eschews the motor car, their presence will still have an impact on vehicle traffic. This will flow more slowly if there are more pedestrians, partly due to greater frequency of pedestrian signal phases being activated, and partly because of greater occupancy time when the signals are on pedestrian phase and traffic is stopped. Reduction in the number of pelican</p>	Implement recommendations from transport modelling report as soon as possible	The results of TfL's additional modelling work and the consideration to mitigation measures form part of the evidence base underpinning the AAP.
			More radical re-design of	

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		<p>crossings (on safety grounds) has further slowed traffic flows. This presents a particular challenge in Station Road, where the already heavy pedestrian flows are likely to be increased by the opening of the Mosque, Civic Centre site development and Tesco's expansion plans. Adjustments to signal timings, kerb alignments and minor changes to junctions (as envisaged at para 2.5.10, for example) will not satisfy the needs of all those (pedestrians, cyclists, motorists, delivery vehicles, buses and emergency vehicles), competing for very limited carriageway width. A more radical redevelopment of Station Road as a boulevard with pedestrians/cyclists/buses segregated from each other and from general traffic seems the only way forward unless certain categories of traffic are provided with alternative routes. However only cycling (via back roads) seems amenable to diversion away from Station Road.</p>	<p>station road is necessary to cope with the additional traffic and pedestrian demand-suggest boulevard with segregated cycle/bus lanes</p>	<p>The AAP must be a realistic and deliverable plan to pass the tests of soundness. Comprehensive redevelopment of Station Road to achieve a carriageway width necessary for the degree of segregation suggested is unlikely to be a viable proposition in the plan period.</p>
25	2.5.11	<p>Para 2.5.11 acknowledges that significant cycling improvements could be made across the Intensification Area. If cycling is to be encouraged further, there is a need for proper, segregated cycle lanes. At present many cycle lanes are simply too dangerous to use because they are a part of the road which is dotted with parked cars. We suggest that consideration should be given to identifying quieter roads as alternative routes for cyclists, where verges could be converted to dedicated cycle lanes so that cycling is a more tranquil and safe experience. If appropriate markings are used, some underused footpath space might be suitable for shared use by pedestrians and cyclists.</p>	<p>Need segregated cycle lanes</p>	<p>Text amended to recognise that some segregated cycle lanes may be appropriate at busier junctions.</p>
		<p>The document refers at para 2.5.7 to some spare car parking capacity in Harrow Town Centre on. At para 6.8.5, which deals with the redevelopment of Gayton Road, there is a suggestion that the car park there could be relocated elsewhere within the town centre. It does not say where, nor does it justify the use of costly town centre land for parking when the general emphasis is to encourage walking and cycling.</p>	<p>Concern over proposals to relocate parking at Gayton Rd</p>	<p>The text does not seek to 'relocate' provision from Gayton Road car park, but rather to make use of spare capacity at other town centre car parks.</p>
9	Para 2.5.7	<p>Parking is in the wrong place. Why bring cars to the centre. Parking should be on the outskirts to collect cars from the</p>	<p>Park and Ride facilities</p>	<p>Park and ride facilities can be useful in some situations but risk undermining the objective of a more</p>

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		<p>suburban zones. Park and ride or better bus routes should then take visitors within the Intensification Area. This will separate pedestrians from vehicles.</p> <p>Through traffic should also be analysed, identified and solutions reached.</p>	<p>should be introduced from the edge of the Intensification area</p>	<p>comprehensive modal shift from car use to public transport (or other sustainable modes).</p>
9	Para 2.5.8	<p>This should be described in more detail.</p>	<p>More detail</p>	<p>Details included in the additional transport modelling work, forming part of the evidence base for the AAP. It would be inappropriate to set out details of specific improvements here.</p>
51	2.5.9	<p>With the level of development anticipated within the Intensification Area, there is clearly going to be a huge pressure on our roads and other infrastructure.</p> <p>2.5.9 refers to the impact assessments being undertaken by the Council and TfL and the need to encourage people to walk and cycle. This is an ideal that would reflect a growing trend in Central London, where many people cycle to work or pick up a “Boris Bike” to get around the core area. However, given the age profile of people in Harrow compared to Central London, the ideal is not entirely achievable. Cycling in an urban area is for young adults as opposed to older people and children and 2.2 states that the age structure in the Intensification Area is unlikely to change.</p> <p>This brings us to the fundamental question of whether the proposed density of development is sustainable?</p>	<p>Cycling may not be an appropriate solution given Harrow’s demographics</p> <p>Is the proposed density of development sustainable</p>	<p>Disagree that increased cycling is not achievable in Harrow. The scale of development to be accommodated within the Intensification Area has already been established in the Core Strategy.</p>
9	Para 2.5.10	<p>Which part of Station Road? It is very long and goes through Harrow Town Centre.</p>	<p>Which part of Station Road</p>	<p>This paragraph deals with the Station Road sub area (the section of Station Road within Harrow town centre has already benefited from public realm improvements).</p>
50	2.5.12	<p>Chapter 2 provides a portrait of current situation in respect of the intensification area, including Wealdstone.</p> <p>The draft AAP acknowledges that Transport for London is currently testing the cumulative impact of the development proposed within the Intensification Area. Paragraph 2.5.9 of states</p>	<p>TfL modelling</p> <p>Remove reference to Kodak site</p>	<p>TfL have now completed the more detailed modelling work and this paragraph has been updated to provide a brief summary of the findings.</p>

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		<p>that <i>“the preliminary results show that a number of junctions in the area will experience a higher level of congestion as a result of the proposed intensification, reinforcing the need for localised mitigation, including modal shift towards walking and cycling.”</i> Land Securities have engaged with TfL and Harrow Council in respect of the strategic modelling and we understand that it is to be published in due course. We wish to continue our engagement with TfL in the production of the strategic modelling for the wider area.</p> <p>In terms of transport and movement, paragraph 2.5.12 of the draft AAP states that <i>“depending on the mix of uses proposed, the redevelopment of the Kodak site is likely to have a disproportionately higher impact on the local transport network than other sites within the Intensification Area where there is greater capacity.”</i> We do not consider that it is appropriate to make this assumption at this stage particularly given the existing use of the site and the negotiations which are currently being undertaken with TfL and Harrow. There also appears to be no evidence to support this statement, particularly given that TfL have not completed their strategic modelling.</p> <p>We would request that this reference is removed from the AAP and reference is purely made to the requirements for improved access and walking and cycling links which Land Securities duly note and have sought to incorporate into the proposed scheme.</p>	<p>having a <i>disproportionately higher impact on the local transport network than other sites within the Intensification Area.</i></p> <p><i>Replace with requirements for improved access and walking and cycling links</i></p>	
9	Para 2.5.13	Trams?	Trams	There are no plans for a tram network, which would constitute a significant component of infrastructure that would duplicate the function of existing bus capacity.
40	Chapter 2	While we welcome the emphasis on sustainable forms of transport, especially walking, within the area, we feel that insufficient attention has been paid to present deficiencies in links to other parts of the Borough. In particular, there is a need to ensure that residents of areas of Harrow with high rates of unemployment can access new employment opportunities in the Intensification Area. Large social housing estates, such as those	Ensure links from outside the Intensification Area to within it are improved	The Intensification Area benefits from high public transport accessibility levels which, in part, reflect the high level of bus connectivity between this part of the Borough and other districts of Harrow. The Local Implementation Plan is the appropriate document for improvements including any new bus routes that may be required throughout the Borough. The role of the AAP is

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		<p>at Harrow Weald and Pinner Hill, need special attention. The former is geographically quite close to the Kodak site but lacks a safe and pleasant walking or cycling route. The latter has no convenient public transport links to anywhere in Wealdstone, including the Kodak site.</p> <p>Indeed, the present lack of good east-west public transport links through Wealdstone is something that needs emphasis. The main railway line is not just a barrier for pedestrians and cyclists. It is also impenetrable by double-deck buses. New bus infrastructure and routes should, we believe, be added to the travel planning measures listed in 2.5.13.</p>	<p>New bus routes and infrastructure including improved east west links from Kodak should be included</p>	<p>to focus on movement within the Intensification Area. Significant improvements to the railway (eg new vehicle bridges or tunnel deepening/widening) would constitute substantial and unnecessary components of new infrastructure within the plan period.</p>
19	Chapter 2	<p>Station Road</p> <p>Para 2.4.13 states "Station Road is the key public and private link" with "heavy usage", "congested" and "uncomfortable environment". 2.5.8 offers improvements at junctions, changes to parking, wider footpaths and cycleways, but do not address how Station Road can cope with the increases in traffic which the development will create - do not see how the Core Strategy Transport Audit could conclude that the existing road could cope with the additional traffic from the new development (the development at Stanmore Park had a very detrimental effect on traffic in Stanmore). Para 2.5.10 confirms the problem and its aim to have "less traffic-intensive uses" at "major opportunity sites" in Station Road is fanciful.</p>	<p>Traffic congestion</p>	<p>The aim of the AAP (reflected in this paragraph) is to improve the environment of Station Road and the performance of some junctions (which were highlighted in the Transport Audit as having localised, peak time congestion issues) rather than to substantially increase the capacity of the road – which would be likely to simply draw in traffic for congested parts of the network elsewhere.</p> <p>‘Less traffic intensive uses’ does not necessarily mean less trips, but less trips by unsustainable modes leading to a modest reduction in car congestion. Text amended to clarify this point.</p>
19	Fig 2.8	<p>Fig 2.8 on p 18 - refers to joint use by cyclists and pedestrians. Potentially dangerous! Belmont Circle (outside the Action Area) is an example - shoppers inevitably drift about and stray into cycle paths - a shared area should never be in a shopping centre. This sort of joint use should be avoided! Joint use in parks would be safe if cycles had bells and the cyclists used them - why was this sensible practice discontinued?</p>	<p>Joint use of paths for bikes and pedestrians should be avoided</p>	<p>With appropriate segregation of pedestrian and cycle paths, cycle provision adjacent to busy roads is preferable to cyclists using a heavily congested vehicular carriageway.</p>
30	Chapter 2	<p>The projected increase of 4,160 new residents in the Intensification Area within the plan period will severely strain the</p>	<p>Improve the stations</p>	<p>The impact of Intensification Area strategic growth upon transport capacity has already been assessed through the Core Strategy. The accessibility shortcomings of</p>

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32	Chapter 2	<p>transport infrastructure.</p> <p>There will need to be a new Harrow Town Centre bus and train interchange with the added possibility of a (free) tram route to Wealdstone along Station Road.</p> <p>Currently Harrow-on-the-Hill train station and bus station are poorly accessed, unattractive and unwelcoming gateways for visitors and potential businesses to Harrow.</p> <p>Harrow and Wealdstone Station is an attractive period building but has poor accessibility.</p> <p>This chapter provides an overview of the intensification area at the current time and College Road is identified within the Harrow Town Centre character area.</p> <p>We would agree with the assessment for this character area and would comment that its current state reflects a number of lost opportunities, a lack of general investment and a historic failing to take a holistic and bold approach in developing the town centre generally. A coordinated and comprehensive approach to the development of and investment in, together with enhancements to the general environment, advocated by the Intensification Area will make a real difference to the town centre.</p> <p>In terms of Transport & Movement, we note the comments made in respect to Harrow-on-the-Hill station and the Harrow bus station and their potential for improvement. We would comment that the solution to this, and indeed many of the other initiatives within this section, are not ones that any individual developer can sustain but ones that should be addressed through an associated Community Infrastructure Levy whereby all appropriately located developments contribute to the wider delivery. Critical to delivering an improved public transport interchange, and the modal split proposed, will be Transport for London and their ability to prioritise improvements at the station. However, it is imperative that development is brought forward in the short term and this should</p>	<p>Pool CIL receipts to fund improvements to the stations</p> <p>Development should be allowed to go ahead in advance of infrastructure improvement</p> <p>Need to ensure contribution demands are not too high to stifle investment</p>	<p>Harrow on the Hill Station are already documented in Harrow's Core Strategy (2012) and Policy CS2(M) makes provision for developer contributions through the Community Infrastructure Levy in the event of specific proposals for improvements to the station. Harrow & Wealdstone station is fully accessible.</p> <p>The accessibility shortcomings of Harrow on the Hill Station are already documented in Harrow's Core Strategy (2012) and Policy CS2(M) makes provision for developer contributions through the Community Infrastructure Levy <i>in the event</i> of specific proposals for improvements to the station. Other CIL requirements are also listed in the Core Strategy and will be brought forward and consulted upon in a draft charging schedule later in 2012.</p> <p>The implementation of a Harrow Community Infrastructure Levy, informed by viability, will put the funding of local infrastructure from development onto a more adequate and certain footing.</p>

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		not be stalled by a delay in infrastructure coming forward. It is also important to ensure that expectations are properly managed in respect to the financial burdens that each site will need to bear and how this manifests itself into the viability of an individual proposal and the wider package of benefits, including community, affordable housing etc that a scheme can sustain. Our experience is that the expectations as to what an individual development can deliver by way of infrastructure provision has historically stagnated investment in the town centre generally.		

Chapter 3

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9	Para 3.2.1	I doubt if Harrow's appeal is highly valued by residents. What is its appeal? Harrow has few strengths that can be marketed.	What is Harrow's appeal	The Council disagrees, as does the market, with significant developer interest in many of the strategic opportunity sites allocated. Harrow's strengths include fantastic public transport connections, green leafy suburbs, easy access to a network of open spaces and parks, and excellent schools and other local amenities.
29	Key Issues Challenges 3.3	Under section 3.3 Issues, there is reference to Green Space and landscaping which is mentioned only in the last two bullet points, and appears passive. Section 3.4 in respect of challenges refers to securing environmental improvements in advance of, or parallel with growth in the area and this is to be welcomed.	Green space	Unclear how these statements are construed as passive. The order of the bullet points does not convey priority, or lack of, in respect of the issues identified. Support for the securing environmental improvements is noted
53	3.3	Chapter 3.3 states "Harrow town centre shopping malls are inward looking and make no contribution to the public realm". They certainly are physically and mentally inward looking, which is why all sensible residents go out of the Borough to shop.	Inward looking shopping malls	Comments are noted
9	Para 3.4	The tenth paragraph does not reflect the statement in para 2.5.8,	Consistency	Chapter 2 and 3 have been merged and this

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38	3.4	<p>however they are more accurate.</p> <p>Bullet points should be added here stating the following:</p> <p><i>“manage and reduce the impacts of climate change and increased risk of flooding through the layout and form of the development and appropriate application of sustainable drainage techniques.</i></p> <p><i>Remediation of existing contamination and reducing the risk of future contamination through strategic development.”</i></p>	Addition of bullet points as stated	<p>inconsistency addressed</p> <p>Chapters 2 & 3 have been merged. Impacts of climate change are dealt with at para 2.34 and cover the majority of matters raised</p>
9	Para 3.5	It will not require taller buildings. Higher densities can be achieved with maximum 6 – 10 storeys dependent on the area.	Limit tall buildings	See amendments to Policy AAP6
31	3.5	<p>'Enhancing Harrow's profile';- The feasibility of the installation of a lightweight electric tram system linking Harrow & Wealdstone Station/Wealdstone Centre, Harrow on the Hill Station/ Shopping Centre and possibly the Leisure Centre and maybe the Kodak site should be examined in some detail as a priority as it would help alleviate the presently overstretched bus service and congested Station Road, while greatly improving links between key areas, bringing the whole entity more cohesively together with a low carbon ecologically sound transport system, which would help raise the overall profile of the whole Action Area. A link with Northwick Park Hospital and the Harrow Campus of the Middx. University I believe should also be considered.</p>	Explore possibility of tram system	In discussion with Transport for London, it was concluded that trams would not be a viable nor feasible option to pursue for the Heart of Harrow.
40	3.5	<p>There should also be a stronger emphasis on the creation of a new transport hub (for trains, buses and trams?, in close liaison with tfl) accessible at all levels at the entrance to the St. Anne's Shopping Centre/ Harrow on the Hill Train and Bus Station. I believe this should be at the heart of any new development.</p> <p>We are also concerned about the coupling of 'taller buildings' with 'higher residential densities' in 3.5 (para 3). It is acknowledged that tall blocks of flats are not a suitable environment for family housing (see, for example, the current Government consultation Allocation of accommodation: guidance for local housing)</p>	Emphasise the creation of a transport hub	<p>Both the Core Strategy and the AAP are clear on the intention to provide a modern transport interchange through redevelopment of the Bus Station and Harrow-on-the-Hill Station</p> <p>See the amendments to Policy AAP6 which address these issues</p>

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42	3.5	<p>authorities in England). There are many examples within London which show they are not necessary for the achievement of high density, as long as the car is not allowed to dominate.</p> <p>Section 3.5 says “ Achieving the Core Strategy targets will require taller buildings and higher residential densities to be woven into the existing urban fabric.” If taller buildings are to be “woven into the residential areas” there needs to be a maximum height. Most of the AAP indicates up to 8 storeys. We consider there should not be any buildings taller than nine storeys in any part of Harrow.</p>	Limit tall building heights	See the amendments to Policy AAP6 which clarifies the definition of taller and tall buildings
54	3.5	<p>It is noted that under Opportunities (para 3.5) reference is made to the need for taller buildings and higher densities to be delivered in the AAP in order to achieve Core Strategy development targets. However it should be made clear that these forms of development should always be considered within the context of their potential impact upon the existing local and historic character of Harrow and Wealdstone, and beyond. For example we would seek to ensure that taller buildings and higher density levels do not cause harm to the significance of heritage assets, including their settings. This could be addressed through modification to policy AAP6: Development Heights so that the significance of heritage assets are fully assessed and conserved.</p> <p>In connection with the Harrow Town Centre sub-area, tall buildings may be considered appropriate (para 3.6.7 and 4.4.4). We would suggest that, where tall buildings are proposed, the impact of them should be carefully balanced against their potential impact upon the setting of the Harrow-on-the-Hill conservation area and its range of heritage assets. At present the text (para 3.6.7) suggests opening up sight lines to St Mary’s Church, however no mention is made of the setting of the heritage assets that define Harrow-on-the-Hill nor the need to conserve its significance by avoiding inappropriate development in its setting.</p>	Need to ensure taller buildings don’t adversely impact on heritage	<p>See the amendments to Policy AAP6 which clarifies the definition of taller and tall buildings</p> <p>New paragraph 2.45 is amended to include a bullet point regarding the safeguarding of the setting of the Harrow Hill conservation area and its range of heritage assets.</p>
54	3.5	<p>Conserving the area’s heritage assets and wider historic environment should be seen as an opportunity rather than just a challenge (para 3.4 and 3.5). PPS5 policy HE3 and London Plan</p>	Add conserving heritage as	<p>Agreed in part. The Council considers the conservation of heritage assets to be both an opportunity and challenge. Chapter 2 has therefore been amended to</p>

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		policy 7.9 clearly places the positive and proactive management of the historic environment as a priority and as a potential catalyst for regeneration which can deliver social, economic and environmental benefits.	an opportunity	include this as an opportunity as well
9	Fig 3.1 Harrow & Wealdstone Intensification Area sub areas	There is no such place as Wealdstone West. It is Harrow View. It is and will always be completely separated from Wealdstone by the railway.	Change name of Wealdstone West to harrow View	The sub areas are based on an urban character analysis. The Wealdstone West sub area is defined its large industrial sites and therefore extends east of the railway to also include the ColArt site
47	3.6	P.23 Section 3.6 P.23 et seq. Area-Based Issues, etc. A number of “other considerations” in this section are prefaced “ Explore ... ” . Instead, a more affirmative statement should be adopted – “ Improve “	Replace word as stated	In the majority of instances where ‘explore’ is the preface it is in the context of ‘explore opportunities to improve’, highlighting the fact that there are either barriers, or alternatives and options available that need to be considered in respect of such improvement. The context is therefore correct.
9	Para 3.6.2	– It cannot physically be well connected to Wealdstone Centre. Improving the image of Wealdstone from the railway is a nonsense. The speed of trains here is very high.	Physical connection	The Council considers that opportunities exist, and that should be pursued through the AAP, to enhance connections between development of the Kodak site and Wealdstone town centre – despite the physical barrier the railway line presents
19	3.6.2	<p>Access from Kodak site to Wealdstone</p> <p>Para 3.6.2 describes improvements to access from the Kodak site into Wealdstone - the new pedestrian/cycle link across the railway shown in fig 1.2 is essential - it will hamper the commercial life of Wealdstone if this is not built (and will undermine the stated aim of reducing car use). It is a concern that Land Securities appear not to show or favour this part of the development in their plans. Improvements to the railway bridge described in 3.6.3 - assume these are to make it more pedestrian friendly and secure - increasing the height available for traffic must be uneconomic. Prone to flood - how much is this due to failing to keep drains clear/inadequate maintenance/cost-cutting?</p>	New access over railway from Kodak, and improve existing links	<p>The AAP retains the proposal for bridge/underpass providing a new pedestrian and cycle connection across the railway line to connect the Kodak site with the proposal for a new secondary school on the Teachers Centre site. While evidence show that delivery of this enhanced connection is not currently viable as part of the Kodak development, the Council considers the potential for possible delivery should be retained should this prove viable at some time in the future.</p> <p>The improvements to the bridge are in respect of enhancing the environment for pedestrian use. Localised flood under the bridge is due to the change in</p>

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50	3.6.2	<p>Paragraph 3.6.2 of the AAP outlines the key issues, challenges and opportunities for Wealdstone West. Land Securities support the acknowledgment by the Council of the opportunity for major redevelopment on the Kodak site and the requirement for good integration to deliver the regeneration benefits for Wealdstone. We note that the Council have highlighted that a key consideration is the opportunity for new views/vistas from the Kodak site. We assume that this reference is related to Chapter 6 which sets out the site specific guidance for Site 02 and seeks the creation of a new vista to Headstone Manor from Harrow View.</p>	<p>Key issues for Wealdstone West</p>	<p>levels. Support is noted. Reference does refer to Chapter 6 and the creation of views to Headstone Manor</p>
54	3.6.2	<p>English Heritage has recently commented upon current Outline Planning Application for the redevelopment of the Kodak Site. In our response we raised concerns regarding the impact of the proposed development upon the setting of Headstone Manor (listed grade I) and its site as a Scheduled Monument within a complex of grade II* and grade II listed buildings.</p> <p>This collection of heritage assets is a key element of Harrow's historic environment and we would seek to ensure that the policy framework for the conservation of this site and its setting is sufficiently robust, so that the significance of the assets is not harmed through inappropriate development. With these points in mind we would suggest that the one of the key considerations for the Wealdstone West sub area (para 3.6.2) is to ensure that Headstone Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage assets. This is achieved through thorough analysis of all the heritage assets, their significance and the contribution the setting makes to their significance. This includes assessing the assets individually and collectively. This approach is line with Planning Policy Statement 5: Planning for the Historic Environment (PPS5) (2010) and English Heritage's <i>The Setting of Heritage Assets</i> guidance (2011).</p>	<p>Add key consideration of ensuring headstone Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage assets</p>	<p>Agreed. Suggested further key consideration for the Wealdstone West sub area has been included.</p> <p>It should be note that the Council has concluded, in its response to the current Kodak planning application, that the development on the Zoom Leisure sites represents an encroachment however the retention of a portion of the existing open space will provide a buffer to Headstone Manor, coupled with building heights of two to three storeys in scale, will ensure an acceptable relationship is maintained. Careful scrutiny of building materials and landscaping of the open space are required through reserve matters.</p>
9	Para 3.6.3	<p>If the area is under performing it should be regenerated properly in</p>	<p>Regeneration</p>	<p>The wholesale regeneration of Wealdstone is currently</p>

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		its own right not just a link between Kodak and the leisure centre. Its low key nature is its problem. It is not a strong compliment to Harrow Metropolitan character. It is dying, worn out and shabby. The low key nature should not be safeguarded. It should have as great a presence as Harrow Town Centre, but in a different way,	of Wealdstone	undeliverable. Through delivery of the AAP objectives and key opportunity sites over the next fifteen year, these will provide the opportunity and demand to significantly redevelop Wealdstone town centre
38	3.6.3	We suggest the wording of the 10 bullet point is altered to include: <i>“...taking into account of the fact that a significant portion of Wealdstone town centre falls within Flood Zone 3 and development should be set back a minimum of 8 metres from the outer edges of the culverted Wealdstone Brook.”</i>	Reword bullet point 10	Agreed, the suggested amendment has been made
53	3.6.3	Chapter 3.6.3 states “add diversity to the existing small scale and specialist retail offer”. Yes please....”Enhance the role of the town square”. Where is the town square??	Retail	Support for the objective for the sub area is noted. The town square is located between the High Street and Headstone Drive
19	3.6.4	Welcome action on Belmont trail in 3.6.4 (but question how realistic it is for the railway bridge, Masons Ave, Peel Rd., Palmerston Rd., Elmgrove Rd. and Hindes Rd. to be part of the Green Grid).	Green grid	While these proposals may not take the traditional form of green corridors, the greening of street environments within the Heart of Harrow are crucial to delivery of the green grid and the establishment of a true network.
40	3.6.4	The reference to 'contemporary reinterpretations of suburban housing types' in 3.6.2 signals to us low density and car dependence and we are not sure what is meant by 'a metroland / Victorian suburban form' (3.6.4). We hope for improvements in the text here.	Clarification	Agreed. Additional text has been added to paragraph 2.35 clarify that this means that new development should have regard to the existing character and context but instead of replicating this, it should be reinterpreted through modern design and contemporary buildings.
9	Para 3.6.5	Trams? Improve the image of existing buildings and “strongly promote” not “consider” redevelopment where possible. Wider streets, planting, boulevards etc. should be provided through a Town Centre Design Guide.	Textual changes Need a Town Centre Design Guide	In discussion with Transport for London, it was concluded that trams would not be a viable nor feasible option to pursue for the Heart of Harrow. The suggested amendment to para 2.41 re 'strongly promote' is agreed and made The AAP takes the place of the proposed Town Centre Design Guide, and as a development plan document has significantly more weight in controlling new development and delivering change, such as that desired for Station

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
9	Para 3.6.7	<p>The recent public realm improvements and new bus routes have not started to create a dramatic uplift.</p> <p>I am not convinced that there needs to be strong connections to Lowlands Recreation Ground. For what purpose?</p>	Need for link to Lowlands Rec	<p>Road</p> <p>Comments re recent improvement and no dramatic uplift are noted</p> <p>The improvement to Lowlands Recreation Ground are to serve the town centre, being the only green space within the town centre boundary, and to make provision for outdoor events.</p>
9	3.6.7	<p>It needs to be reaffirmed as a Metropolitan Centre but this does not mean tall buildings.</p> <p>Proper Town Centre Design Guidance is required. This should not be superficial it needs to be more than that.</p>	Need a Town Centre Design Guide	<p>This is clarified in the amendments made to Policy AAP6</p> <p>The AAP takes the place of the proposed Town Centre Design Guide, and as a development plan document has significantly more weight in controlling new development and delivering change</p>
19	3.6.7	<p>Para 3.6.7 "Co-ordinated material palette" is Council-speak and is unintelligible.</p>	Clarity of text	<p>Agree. Text has been amended to now read - Ensure new developments within the town centre use similar materials, providing a more coherent character.</p>
19	3.6.7	<p>Para 3.6.7 also states the need to improve the visual relationship between the town centre and Harrow Hill (which is also stated elsewhere in the consultation). Yet (5th para from the end) it makes sympathetic comments about tall buildings. These statements are incompatible - other locations in West London (like Uxbridge and Heathrow) do not have the same contrast between tall buildings and historic/natural features that Harrow does, and they can accommodate tall buildings. This is not the case in Harrow!</p>	Concern over tall buildings	<p>See amendments to Policy AAP6</p>
32	3.6.7	<p>We fully support the Council's assessment of its own profile and we fully support the objective that the Borough must raise its profile and embrace change. The Borough missed out on the growth and benefits of the 1990's which adjoining boroughs all benefited from. However, Harrow is well poised now to exploit the potential investment benefits coming forward. We believe that this is crucial if the Borough is to retain its existing Metropolitan status and to establish a secure and buoyant housing and employment</p>	Raising Harrow's profile	<p>Support is noted to raising Harrow's profile and objective of retaining the existing Metropolitan status of Harrow town centre</p> <p>Agree that section 3.3 needs to identify the poor quality of recently built development as an issue – amendments have therefore been made to para 2.31</p> <p>Agree that a reference to the benefits that new</p>

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
51	Key Issues Challenges 3.6.7	<p>market, with modern and appropriate community facilities, high quality public realm and an active town centre which meets modern retail and leisure requirements, which caters for all sectors of the community, and which contributes to the wider economy.</p> <p>It is considered that the poor design of buildings, which has a subsequent impact on the image of both Harrow and Wealdstone town centres and the Station Road area and subsequent investment, needs to be appropriately reflected as an issue under Section 3.3.</p> <p>Paragraph 3.67 relating specifically to Harrow Town Centre does not make reference to residential uses which it is acknowledged elsewhere in the draft APP. Residential uses will ensure round the clock use of the town centre, adding to its vitality and supporting the night time economy the APP seeks to achieve and which is wholly appropriate given the town's Metropolitan status. Similarly under paragraph 3.67, the bullet point <i>'explore building forms that are appropriate to its Metropolitan status, which may include tall buildings'</i> needs to be revised. During the Core Strategy EIP the Inspector was very forthright that the principle of a tall building at 51 College Road had been established and that this had to be reflected within the document. The Core Strategy was subsequently revised to reflect this position. It is therefore not appropriate or consistent with the Core Strategy to state that, in the context of 51 College Road, that there is a requirement to revisit this exercise given that this has already been undertaken and concluded and that, at least in respect to this site the principle of a tall building has been established. Furthermore, the future design of buildings must balance aspirations with economic reality and viability to ensure deliverability.</p> <p>In 3.6.7 , a “new retail complex” is envisaged, with “major new floor space”. I would suggest that new retail development could not be justified in Harrow as it could never compete with regional centres in Shepherds Bush (Westfield), Brent Cross and Watford. National and international retailers are reducing the number of property outlets, rather than increasing as the growing and</p>	<p>Poor design of existing buildings to be reflected in paragraph</p> <p>Need to acknowledge residential uses</p> <p>Acknowledge the principle of a tall building on 51 College Road</p> <p>Lack of retail demand for large premises</p>	<p>residential development will bring to the town centre</p> <p>The reference to ‘exploring building forms that are appropriate to its Metropolitan status’ has been deleted. The amendments to Policy AAP6 make it clear that the role and function of tall buildings is not required to acknowledge the town centre’s Metropolitan status but as landmarks providing orientation to locations of significant public interest.</p> <p>Agreed. It was hoped that Debenhams would consider significant redevelopment of their existing store and site to provide for a new major retail complex but discussion with the owner of the building have not resulted in such commitments, so this has been amended. New retail will however come forward as a requirement of the town</p>

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		<p>irreversible trend to internet shopping is changing the face of our high streets. A bigger challenge facing Harrow is how to deal with the inevitable number of high street vacancies. Market forces will determine that rents will fall and retailing in the town centre may become more affordable for local entrepreneurs. The Council's challenge should be how to make the shopping and leisure experience in Harrow unique and enticing. The Mary Portas Review was probably not published when you were drafting the consultation, but I am sure you are aware of it now and would suggest that you consider its recommendations</p> <p>In 5.7.9 it states that the Council will limit the proportion of non retail activity to 15% of primary frontage. How about a whole area dedicated to bars and cafes?</p>	<p>Consider recommendations from Mary Portas review, think of more local – unique offer.</p> <p>Dedicate an area to leisure uses</p>	<p>centre policy that new development provide active ground frontage.</p> <p>The Mary Portas review was considered and is referenced at Chapter 8. Amendments have also been made to the policies dealing with retail and shopping frontages. Although the % thresholds for the primary and secondary frontages remain, the policy is more flexibly and enables the consideration of uses that benefit the town centre and also temporary uses to address periods of high vacancies.</p>
13	Section 3	<p>There is a major omission in the Key issues, challenges and opportunities [section 3] – that of sustainability, particularly in the context of global warming. Harrow has a Climate Change Strategy and a Sustainable Community Strategy, but they are not listed among the issues to be taken into account [3.3]. They should be. They should have the roles of over-riding borough-wide strategic considerations which guide and direct this AAP, and this should be stated clearly in 3.3. This should than lead to adding extra challenges to the list in 3.4 along the lines of:</p> <ul style="list-style-type: none"> - contributing substantially to reducing Harrow's greenhouse gas emissions and carbon footprint - creating living and working environments that help and encourage residents to lead low-carbon and energy-efficient lives 	<p>major omission in the Key issues, challenges and opportunities of sustainability</p>	<p>Agreed. Paragraph 2.34 has been amended to include the issue of climate change, in particular issues of flooding, drought, island heat effect, and energy costs and reliability, and the need to address these through sustainable design. Also see para 4.36</p>
40	Chapter 3	<p>We are generally in agreement with the analysis here. We note, however, that, both here and in chapter 2, there are references to the undesirability of guard rails, but no systematic approach to how they can be removed without jeopardising pedestrian safety or the perception of safety. In our opinion, the most important step in enabling and encouraging walking as a mode of transport would be the introduction of a 20 m.p.h. limit throughout the Intensification Area. This, we believe, would enable all guard rails</p>	<p>Introduce a 20mph speed limit</p>	<p>The decluttering of Station Road is to form a package of transport measures to be implemented, including the transformation of the road into a green boulevard that readdresses the existing traffic dominance of the environment</p>

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
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that obstruct pedestrian desire lines to be safely removed.

Chapter 4

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
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9	Para 4.1.6	"New exemplary buildings" is a subjective comment and means nothing.	Clarity	Agree. This has been amended to refer to a modern and contemporary take on the Metro-land character that prevails across most of the rest of the Borough.
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9	Fig 4.1 Artist's impression of a 21 st Century reinterpretation of the classic Metro-land poster	What is the relevance of this? Why are there two yellow lumps intruding into the skyline completely contrary to the Views Assessment? Do not let Dandara influence the proper analysis. This drawing just demonstrates how intrusive tall bulky buildings will be.	Amend drawing	This drawing has been omitted from the final document
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19	Fig on Pg 29	p29 - the text "office with views of the green belt" overlooks the objection that the office would be visible from the green belt. The fig shows office blocks intruding on the skyline - which we would rather avoid. Metro-Land was a rather ambiguous concept - hyped as being countryside but ended up with a vast movement of population to suburban life - which was pleasant and greenish (and still is) - but was not the rural idyll being hyped. Do we really want to repeat this piece of misrepresentation?	Amend drawing Concept of Metroland	This drawing has been omitted from the final document The concept of Metro-land within the AAP is to promote a modern and contemporary take on the Metro-land character that prevails across most of the rest of the Borough (i.e. retaining the best elements and ensuring these are designed into new development schemes).
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ID	Section / Para	Summary of Comments	Topic / Change	Council Response
30	Section 4	The poster for 'Harrow-The Heart Of Metroland' with the Dandara-like buildings breaking the Harrow Weald Ridge skyline was considered to be divisive at the last group forum held at the Civic Centre. Whilst the colour of the blocks has changed from red to an almost obscure lime there is still the perception that Harrow Council supports tall buildings that destroy the sky-line of the Weald Ridge and Harrow Hill. Public consultation has proved that there is little support for tall buildings in such prominent and intrusive locations.	Amend drawing	This drawing has been omitted from the final document
13	Vision 4.2.1	Ref 4.2.1 core strategy – vision for the Intensification Area [IA] Good to see that high standards of sustainability are expected from new developments. Highlight this as a requirement for developers, encourage them to be imaginative for this.	Highlight Sustainability	Support is noted
53	4.2.1	Chapter 4.2.1.. 2,800 new homes. Energy. Water. Refuse???	Utilities provision	Each dealt with through specific policies in Chapter 5
13	Vision 4.2.2	4.2.2 AAP Vision new homes: add low carbon / energy-efficient	add low carbon / energy-efficient	Amended to include 'sustainable high quality new homes' as 'sustainable development covers both matters raised plus significant others (renewable energy, water management, use of durable materials etc)
13	Objectives 4.3.1	4.3.1 Objectives item 1 add "..., and visibly assists sustainable and energy-efficient living" [after "...a strong sense of community"]	Add criteria	These objectives come from the adopted Core Strategy, and for consistency reasons, and the fact they have been through previous consultation and an examination in public, should not be subject to amendment.
9	Para 4.3.5	How will the improvements increase the Borough's "visibility". Incorrect word, it should not be taken as physical visibility.	Clarity of text	As above
19	4.3.5	Emphasis on west London sub-region Para 4.3.1 5 refers to Harrow's role in the west London sub-region. Harrow also borders Barnet, which is outside this region and does not appear to get considered - e.g public transport links in that direction are poor. Consider Harrow's exclusive focus on boroughs to the west is not in its best interests.	Consider sub region to East	As above

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
13	4.3.10	item 10 I don't see why all the key borough facilities need to be located in the town centre; isn't it sufficient that they should be in the IA? This should give more flexibility over premises, costs etc. The IA generally has good connections to the rest of the borough.	Key facilities should be located anywhere in IA	As above.
36	Objectives	Hopefully the regeneration of central Harrow will benefit all residents of the borough but the high density development proposed to finance this will have a disproportionately adverse impact on those who already live in or near the intensification area. Apart from a few comments about treating transition areas sensitively, there is no acknowledgement within the AAP of this issue and no policy explaining how it will be dealt with. At the very least, it should be included as one of the objectives in chapter 4. It should be made clear that there will be no relaxation of the planning regulations for the sake of intensification. There should also be a commitment to early and comprehensive consultation with neighbours	Concern over transitional areas impact re high density development Commit to early consultation	As above. Under the plan-led approach, the policies of Chapter 5 and the site allocations provide the criteria and standards against which proposals will be assessed. Various amendments have been made as a result of the consultation which has sought to strengthen these and ensure they are applied robustly. The new Localism Act has finally introduced a requirement upon developers to consult the community on their proposals prior to submitting their planning application. This is to provide for earlier engagement, enabling the community to influence the overall concept of development schemes before they are fully worked up. The Council is to publish guidelines shortly on our expectations for pre-application developer consultation.
9	Para 4.4.2	What is the opportunity area mainly to the east of Station Road? How will this be developed; currently it is in individual small ownership. More detailed analysis and planning should be provided. If you are suggesting it here, why not elsewhere in the Intensification Area where there are not identified sites i.e. south end of Station Road on the east side?	More detail re multiple ownership site assembly	The AAP policies provide criteria that enable the assessment and determination of development proposals for both allocated and non-allocated sites, such as those east of Station Road. However, the reason no sites within this area are identified for allocation is that none are considered available or deliverable (i.e. they are not sites put forward through various calls for sites)
9	Para 4.4.3	They are key sites and they are in transitional area. Their scale should therefore reflect this and no suggestion of tall buildings should be made.	Transitional zone management and tall buildings	Within the Harrow town west sub-area, although a transition, development is intended to define and form a solid edge to the town centre boundary. Within the Harrow town east sub area, the allocations make clear the need for transition across the sites.
9	Para 4.4.4	There is NO appropriate part of the Intensification Area to locate tall buildings. The views assessment demonstrates this.	Objection to Tall Buildings	While the important feature of the Harrow town centre skyline is Harrow Hill and St Ann's spire, the views assessment seeks only to safeguard identified views

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		The church and The Hill sufficiently mark the Town Centre's Borough wide role and importance.		from visually intrusive development. As clearly set out by the Secretary of State in the Dandara appeal decision, the fact that the proposal broke the ridgeline did not make it unacceptable.
9	Para 4.4.5	How is an east west link going to be formed round the railway? This is not necessary nor crucial. Kodak should be seen as independent of Wealdstone. Wealdstone needs serious regeneration in its own right or it will die.	No need for new link over railway	See previous comment to the same respondent about the same issue
9	Fig 4.2 Intensification Area key diagram	Why repeat figure 1.2?	Duplication of key diagram	The diagram has been split up in the final document. The first to provide a simple summary of the changes proposed by the AAP, the second to reflect the layers of changes from the new maps/figures in support of the policy topics
29	Section 4.5	The provision of more green space and improved green grid is welcomed and supported, please see comments above also	Open Space & Green Grid	Support is noted
9	Para 4.5.1	No taller buildings required.	No taller buildings required.	See previous comments and amendments to Policy AAP6
25	Town centre office blocks	It is acknowledged that there is vacant office space in Harrow town centre and that much of this is in urgent need of upgrading to meet the needs of the 21 st century and so to attract new businesses to Harrow (para 2.4.8). However the Spatial Strategy at 4.5.1 envisages a smaller office market with reduced floor space. Thus it seems that some of the existing office space, including some prime sites, will not be needed at all and could be earmarked for other uses, thus aligning the AAP more closely with the widely accepted principles of Sustainable Development.	Office supply	The strategy is about office renewal. Where offices are currently vacant these should be redeveloped as part of a mixed use scheme, with the residential component enabling the reprovision of new office floorspace within the development. This therefore reduces the overall levels of office vacancy across the town centre and provides for modern office stock. Only when the vacancy rate is significantly reduced will this begin to drive a new more buoyant office market in the town centre.
9	Fig 4.3: Artist's impression	Unintelligible drawing.	Unintelligible drawing.	Noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Intensification Area key diagram	This plan is too simplistic and only deals with identified development sites. It fails to recognise the more difficult issues.	Lack of analysis	Is intended to provide a simple overview of the changes proposed by the AAP. The Council considers it does this but has looked at measures to refine this further
47	Fig 4.2	P.32 Fig.4.2 Some colours are not shown in the Key. Are the delineations of the various uses in each of the Opportunity Sites fixed or are they indicative to show what type of provision would be accommodated on the site rather than the exact position, plot layout? I hope the former.	Error in key	The diagram has been refined as a result of the comments received and includes a more accurate key. The uses shown are the leading land uses for the allocated sites as set out in chapter 5 but the layout of the uses on individual sites is illustrative.
13	Vision	There is a great deal that's good in the overall vision and balance of the draft AAP.	None	General support for the vision and balance of the AAP is noted
32	Vision and Strategy	<p>This chapter outlines the overall vision and spatial strategy for the AAP and its associated sub-areas.</p> <p>In light of the discussions and Inspector's comments made at the Core Strategy Examination-in-Public, we would support reference to the fact that Harrow town centre is the most appropriate location for a tall 'landmark' building and the importance attached to our client's site. Our client supports the approach that the Council has now adopted in the identification of individual sites within the AAP in that these are identified by their location and not by virtue of the proposed developer/existing owner or, for that matter, its existing or previous occupier. However, there are a few instances where the relevant change has not occurred and these should be amended as well.</p>	None	Support for the use of site names rather than the current developer is noted. Amendments will be made to ensure this is applied consistently
50	Vision and Spatial Strategy	This chapter outlines the overall vision and spatial strategy for the AAP. Land Securities support the key objectives for the AAP to deliver the vision for the Intensification Area. We particularly welcome the acknowledgement for 'consolidation' of industrial areas and mixed use development of sites no longer suited to large scale manufacturing/warehousing uses to achieve the objectives of the Intensification Area and the Harrow View (Kodak/Zoom Leisure) site will make a significant contribution to meeting employment and housing targets and provision of new community and green infrastructure within the Intensification Area.	None	Support for the overall vision and spatial strategy is noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
27	Strategic Vision	<p>The borough has considered creating a new Library, a Theatre, an improved Leisure centre and performance spaces many times over the last quarter of a century. These were not built during the times of economic plenty. It seems unlikely that there will be funding whilst we are encumbered with a debt laden economy.</p> <p>The Area Action Plan seems to have reactive approach for the creation of civic amenities based on contributory investment from developers. This failed with St Georges when the proposed Theatre was removed from the construction.</p> <p>The community needs clear and urgent direction for these civic amenity developments to ensure support across the borough. They will be supported and valued because they can improve facilities and enhance the appeal of the area.</p>	Viability of new cultural facilities	<p>A detailed delivery programme has been prepared to support new development within the Heart of Harrow. This is being supported by the preparation and introduction of a Harrow Community Infrastructure Levy to help pay for the new infrastructure. We have not had many significant applications of recent times for development within the Heart of Harrow but the Council is encouraged that many of the opportunity sites identified have already attracted developer interest and are already beginning to discuss proposals with us.</p> <p>The plan does take a cautionary approach to the creation of civic amenities, as these require significant up-front and continuous investment – which the Council does not have. Priority is therefore given over to those items of infrastructure needed or critical to support growth</p>
29	Vision and Spatial Strategy	<p>The Area Action Plan Objectives are listed under section 4.3 and can be broadly supported, especially objectives</p> <p>11) Open Space provision</p> <p>12) Environmental Improvements/Enhancements</p> <p>In respect of these opportunities and in order to ameliorate issues of deprivation to access to open/green spaces the Council may wish to consider Natural England's ANGST (Accessible Natural Green Space standards), which should be referenced in the Core Strategy for the Borough and a link to this can be included within this document.</p> <p>Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:</p> <ul style="list-style-type: none"> No person should live more than 300 metres from their 	Use ANGST Standards	<p>Support for the objectives is noted, as is the references to green infrastructure provision.</p> <p>The ANGST standards are national standards. As set out in the Council's response to the Core strategy representation made by Natural England, the applicability of which within the existing built-up city of London context, whilst desirable, are unlikely to ever be achievable. References to the ANGST standards were therefore not made within the adopted Harrow Core Strategy and are not appropriate for the Heart of Harrow AAP. Nevertheless, the ANGST standards have been considered and assessed as part of the PPG 17 sport, recreation and open space study so requirements and deficiency in this regard now forms part of the evidence base that has informed the AAP, and in particular Policy AAP11-13.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>nearest area of natural green-space;</p> <ul style="list-style-type: none"> • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; • There should be one accessible 500 hectares site within 10 kilometres. <p>Natural England is pleased to see the consideration and reference to Green Infrastructure through the provision of enhancements and increased access to open spaces as part of sustainable development, this should be a key component of all spatial development plans and its inclusion in this document is welcomed.</p>		

Chapter 5 – AAP Policies

AAP Policy1

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
24	AAP Policy 1	Broadly supported. The opening emphasis on high quality design is particularly welcome. The Council is invited to consider introducing a policy that would seek a vacancy strategy for ground floor retail/commercial units to avoid periods of inactivity (e.g. before an occupier is in place, in between lettings). This should promote interim community uses where possible, and encourage activity to avoid blank facades or empty units fronting the street, supporting the principles of London Plan Policy 7.3.	Vacancy strategy	Agreed. However, the Council considers that the inclusion of a vacancy strategy sits better within the context of Policy AAP17 & AAP18, which deal with the integrity of the retail core of the town centres.
29	AAP Policy 1	The Council should give consideration to provision and benefits of green infrastructure and soft landscaping as part of a holistic approach to development, linking in with health opportunities as well as helping to promote walking and cycling initiatives, linking in	Green infrastructure and	Agreed, AAP Policy 4 f inserted to include green infrastructure and soft landscaping as part of the scheme design considerations

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
32	AAP Policy 1	<p>to wider Council objectives</p> <p>Policy AAP 1 sets out the guidelines for assessing development proposals within Harrow town centre. In principle, our client's support these guidelines but comments that these should also make reference to the role that development within the town centre should have in contributing to its needs in respect to the provision of new and enhanced retail, office, residential, community and leisure uses reflecting the overarching objectives of the AAP and paragraph 3.4 which seek enhanced and better quality facilities and which promotes the night-time economy of Harrow. Specifically, point a) referring to design states that proposals should contribute to the <i>'identity of Harrow town centre'</i>. It is unclear what this means or what the identity of Harrow town centre is. The architectural style and quality within Harrow town centre is limited and this was discussed at length at the Inquiry into our client's proposals. Reference to the identity of the town centre of Harrow therefore needs to be further expanded on and a definition provided.</p>	<p>landscaping</p> <p>Reflect contribution of development to meeting objectives</p> <p>Define the identity of Harrow town centre</p>	Policy AAP1 Aa and Ab have been amended.
47	AAP Policy 1	P.36. AAP1 Does this wording prejudice / conflict with AAP6?	Potential conflict	While the Council did not consider there to be prejudice or conflict between the tow policies, it should be noted that Policy AAP6 has been subject to amendment to respond to the comments received. However, it is difficult to know if this has resolved the potential conflict identified as it is unclear from the comment, which part of Policy AAP1 potential conflicts with which part of Policy AAP6.
54	AAP Policy 1	<p>We would encourage the Council to include a bullet point within section A of the policy to address the need for developments to conserve and enhance the significance of heritage assets, including their settings, especially the existing setting of St Mary's Church and Harrow-on-the-Hill. At present the policy wording falls short of recognising the need to protect this key heritage feature, and one that helps define the context of Harrow Town Centre.</p> <p>Paragraph 5.1.6 seeks to address this concern in terms of</p>	New heritage bullet point	Agreed. However the Council considers this is matter pertinent across the AAP area and not just to Harrow town centre. Therefore the suggested addition has been made to AAP4

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		<p>'sensitive character', but we would suggest that this sentiment should be strengthened and made more explicit in the context of conserving the town centre and surrounding heritage assets. We note that policy AAP8: Enhancing the Setting of Harrow Hill is included, but at present there is a lack of connection between these two important policies.</p>	Relate to policy 8	
9	5.1 Character and Amenity	<p>Harrow Town Centre is identified on Fig 3.1 as a distinctive district. What are the 3 sub areas?</p>	Sub areas	<p>Figure 3.1 and its key, show and identify the three character / sub areas that form Harrow town centre. These are Harrow Town East, Harrow Town Central and Harrow Town West. No change</p>
9	Para 5.1.2	<p>Why should many existing buildings remain Owner of Old, poor, low density buildings? Should be encouraged to redevelop.</p>	Encourage redevelopment	<p>Over the life of this Plan, which is 15 years, we are unlikely to see all sites in need of regeneration come forward for redevelopment. The pace of redevelopment will depend on market conditions and the ability to sell or let redeveloped properties to the market. Phasing of development is key to prevent market saturation.</p>
19	Para 5.1.3	<p>Agree comments in para 5.1.3 on architectural features, finishes, location of entrances on corner sites, and durable materials. Question the preference for durable materials for the ground and first floors - with the implication that anything can be used on higher floors - access for maintenance is easier on the lower floors - unwise to introduce a maintenance requirement where access is limited. Agree preference for reuse of buildings with existing character, and (5.1.4) new buildings to be easily adapted for new uses.</p> <p>Para 5.1.11 agree plant on the roof should not intrude on the appearance of the building.</p> <p>Welcome (5.1.23) the intention to restore the Art Deco character of the Safari cinema - Art Deco is a valuable part of Harrow's architectural heritage. Assume the ABC cinema was reclad in the 60s for reasons of fashion (i.e. when Art Deco was under a cloud). If the recladding was because it was in poor condition the operation might not be economic.</p>	Design principles	<p>Agreed, the reference to 'particularly at ground and first floor levels' has been removed to ensure the use durable and easy to maintain materials applies to all floors.</p> <p>Support for other particular elements of the policy are noted</p> <p>The Council acknowledges the potential conflict re cluttering of streets and the provision of new way finding signage but considers this can be overcome through the design and integration of the way finding signage. Amendments have therefore be made in reference to the provision of way finding signage that this is to be designed so as not to add to street clutter.</p>
			Potential conflict re cluttering and new signage	

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		Welcome (5.1.51) control over street clutter and rationalisation of street furniture, and control over A-boards and advertising (5.1.57). Note there is a conflict between the desire to reduce street clutter and the desire to improve signage (e.g. in para 6.5.3).		
9	Para 5.1.4	Considered” can mean thought about and then rejected! Be more forceful.	Wording	The policy requires adaptable building form at ground and first levels. While the supporting text provides two examples, it needs to be recognised there are many ways to which this may be achieved and will depend on site circumstances, proposed use and overall design concept
9	Para 5.1.6	Can only be achieved if a Town Centre Design Guide is produced.	Produce a Town Centre Design Guide	Disagree. The Council considers that the AAP is a more robust means by which to manage the relationships between sites.
9	Para 5.1.12	“High quality” is too subjective.	Clarification	While the Council agrees that matters of design and architectural merit are subjective, planning policy is too much a blunt tool to overcome this. The purpose of the AAP is to guide development in terms of appropriate uses and the standards and design parameters expected to be met. However, within that context, flexibility must be retained to enable a design-led approach to determining the best outcomes for individual sites, recognising that high quality is not just about the finishing’s to buildings but their layout, massing, relationship with neighbouring development and street scene, how they add to the urban grain and character of the area, provide liveable environments, internal circulation... and the list goes on. And what works for one site may not work for another, and therefore to achieve high quality, the design of development must be specific/bespoke to the context of the site. No change

AAP Policy 2

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 2	Broadly supported. The Council should refer to comment 1 which seeks a vacancy strategy for ground floor retail/commercial units.	Vacancy strategy	Agreed. However, the Council considers that the inclusion of a vacancy strategy sits better within the context of policies AAP17 & AAP18, which deal with the integrity of the retail core of the town centres.
24	AAP Policy 2	The Council is also invited to consider whether a policy advocating the planting of street trees would promote the boulevard character to which Policy AAP2 refers, whilst simultaneously supporting the aspirations of the Harrow Green Grid network and London Plan Policy 5.10 on urban greening.	Street Trees	Agreed. Policy AAP2 A(b) amended to include the creation of a green boulevard
29	AAP Policy 2	See comments above which are also applicable to all development within the Area Action Plan area.	Green infrastructure and landscaping	Agreed, AAP Policy 4 e amended to include green infrastructure and soft landscaping as part of the scheme design considerations
9	Para 5.1.19	What is a height appropriate to define and enclose the street?	Define height	The width of Station Road varies along its length, so the height required to enclose the street will also vary. However, the Council considers the alignment of the street frontage rather than height to be the important aspect for Station Road and has therefore removed the reference.
9	Para 5.1.20	Who are the Council's partners?	Partners	These are set out in Chapter 1 – delivery partners include the GLA family, Transport for London, Harrow PCT, developers, landowners, Free school applicants etc
19	5.1.23	Welcome (5.1.23) the intention to restore the Art Deco character of the Safari cinema - Art Deco is a valuable part of Harrow's architectural heritage. Assume the ABC cinema was reclad in the 60s for reasons of fashion (i.e. when Art Deco was under a cloud). If the recladding was because it was in poor condition the operation might not be economic.	Safari cinema	Support for the restoration of the Safari Cinema – subject to viability, is noted.

AAP Policy 3

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	Policy AAP3	Broadly supported. The Council should refer to comment 1 which seeks a vacancy strategy for ground floor retail/commercial units	Vacancy strategy	Agreed. However, the Council considers that the inclusion of a vacancy strategy sits better within the context of policies AAP17 & AAP18, which deal with the integrity of the retail core of the town centres.
49	AAP Policy 3	<p>Our client offers their support for Policy AAP3 given that it represents a pro-development agenda, focusing on the need to strengthen the vitality and identity of the district centre. This can clearly only be achieved through increased investment.</p> <p>It is noted that the policy encourages growth within the sub-areas in the general conformity of the masterplan for each site. Given the comments in the preceding section of this letter, our client is obviously happy with this strategy, subject to a recognition that it is an illustrative plan at this time, with details such as indicative heights not necessarily being absolute maximums if it can be clearly demonstrated that taller, landmark buildings could be appropriately provided.</p> <p>The specific, headline requirements in AAP3 relating to Wealdstone Central are supported.</p>	Building heights	<p>Support is noted</p> <p>The heights set out in the site allocations are based on a detailed urban design assessment. The Council therefore considers these to represent the appropriate building height(s) for each site</p>
50	AAP Policy 3	<p>Policy AAP 3 sets out the guidelines for assessing development proposals in all three Wealdstone sub-areas. Criteria B states that <i>“proposals for the development of identified opportunity sites within the three Wealdstone sub areas should be in general conformity with the masterplan for each site as set out in Chapter 6.”</i> We consider that it is more appropriate to refer to the site specific guidance in chapter 6 as ‘development principles’ rather than ‘masterplan’, given that this section provides the principles which should guide future masterplans for the site. It is not the role of the AAP to prescribe a masterplan, nor to define design criteria which should be subject to a robust urban design analysis forming part of a formal planning application. The AAP should set parameters and a vision and accordingly we find it unsound.</p>	Masterplans	Agreed. Reference to ‘masterplan’ has been replaced with ‘site objectives and development parameters’

AAP Policy 4

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Policy AAP4	We support the reference to water efficiency in 'Policy AAP 4: Achieving a High Standard of Development throughout the Intensification Area'.	Water efficiency	Support is noted
13	AAP Policy 4	policy AAP 4 add a sustainability / green clause as above	add a sustainability / green clause	Policy 4 f inserted to include green infrastructure and soft landscaping as part of the scheme design considerations
24	AAP Policy 4	Broadly supported. The requirement for high quality, durable and serviceable materials to maintain a high quality finish over time is particularly welcomed in accordance with London Plan Policy 7.6. The Council is also invited to consider whether a policy securing a maintenance strategy for major development proposals within the intensification area would favourable supplement this approach.	Maintenance strategy	The Council can and does seek maintenance arrangements for communal areas but not for private buildings. Depending on ownership, the maintenance responsibilities, and any strategy therein, falls to the owner or a body corporation. To include this as a policy requirement seems overly onerous
49	AAP Policy 4	<p>Policy AAP4 sets out good practice guidelines for the Intensification Area that are logical, being in line with other adopted and emerging Local and Mayoral policies. Offered particular support and strongly urged to be retained in the final version is AAP4 criteria C, which states:</p> <p>“Development that would prejudice the future development of other parts of a site, adjoining land, or which would frustrate the delivery of adopted plans and allocation Opportunity Sites in Chapter 6, will be resisted”.</p> <p>This is considered to be an important reference in order to ensure that sites are able to meet and provide the development objectives and outputs clearly set out for each of the areas. It is considered that this demonstrates 'joined-up' thinking throughout the AAP and should clearly be retained in the adopted document.</p>	AAP4 C	Support is noted. This reference is to be retained in the final document
34	Design	<p>We would like to make the following comments/suggestions:</p> <ul style="list-style-type: none"> The document acknowledges the importance of high quality architecture and design and promises new buildings will live 	Design Quality	<p>Support for high quality design is noted. The policy applies to all development, regardless of size.</p> <p>Policy AAP13 requires provision of a range of housing</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>up to these principles. We would like to see this commitment to quality applied to every planning application – large or small – that comes before the planning committee and, crucially, for these principles to apply to any subsequent amendments to plans, particularly for large-scale developments. To date, we have been very disappointed with the poor quality design and architecture of major building projects including the Harrow Central Mosque.</p> <ul style="list-style-type: none"> Any new homes must tie in with the character of existing properties and houses must have adequate garden space. Designs must incorporate storage space for bins to avoid front gardens being dominated by a sea of wheelie bins. We are concerned at the idea that the majority of new homes in the Station Road area will be in buildings that are three to six storeys high and risk over-shadowing or dominating neighbouring properties with a potentially negative impact on existing residents' quality of life 	<p>Character</p> <p>Waste storage and collection</p>	<p>types and sizes, commensurate to the character of the sub area in which it is located</p> <p>Policy AAP4 has been amended to requirements for on site provision of waste collection and disposal.</p> <p>Policy AAP2 B requires the design and layout of new development within the Station Road sub area to respect the scale and character of surrounding residential areas</p>
9	Para 5.1.34	Who will define and decide which sites would benefit from a more comprehensive planning policy?	Clarity	This is in respect of allocated sites in Chapter 6. This provision does not prevent different parts of a site coming forward for redevelopment at different times but seeks to ensure that partial development of sites does not compromise a comprehensive proposal for the whole site from being realised.

AAP Policy 5

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
36	AAP Policy 5	The AAP rightly emphasizes high quality design for developments in the IA but maintaining housing standards is equally important. Unfortunately some parts of the AAP seem to invite compromise. For example paragraph 5.1.32 implies that overlooking could be tolerated as long as sound insulation of flats is up to standard. This should not be an either-or situation. There is no excuse for	Design standards	<p>Agreed. All development should be required to meet the appropriate standards. Paragraph 5.1.32 has been amended.</p> <p>Agreed. Paragraph D has been deleted. Having regard to the comments made, Policy F and the supporting text</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>sound insulation to be substandard, whatever the other considerations of a development.</p>		<p>has been amended to address proposals for the potential 'over development' of sites.</p>
		<p>Another example is the treatment of housing density in Policy AAP5. Paragraph C states that the density of residential developments should conform to the density matrix set out in the London Plan. The next paragraph, D, then goes on to explain how developers can disregard the density matrix if their design is judged to be exceptional and they are willing to pledge more funding for infrastructure. The density matrix itself is not generous and any developments within the intensification area will be in the highest range allowable because of proximity to the stations. The need for infrastructure funding is pressing but it should not be sought at the cost of overcrowding. Paragraph D should therefore be removed and the Council should make clear its intention to uphold housing standards.</p>	Density	<p>With regard to paragraph 5.5.2, this states that developments over 100+ units should provide a greater portion of larger units (3+ bedrooms). This is not concerned so much with provision of family housing but rather housing choice and provision of a mix of housing. Provision of family housing within the Heart of Harrow is to be made on allocated sites outside of the town centres, such as Zoom Leisure and Kodak, Colart and the Leisure Centre sites.</p>
		<p>With regard to housing mix, there seems to be a contradiction. Paragraph 5.5.2 states that most housing in the town centres will be flatted developments suitable for smaller households, but it also states that developments of 100+ dwellings will be expected to provide a greater proportion of larger family units. The key sites identified in the town centre (Bradstowe House, Neptune Point, 51 College Rd, Lyon House, Gayton Road) are all planned, to provide well over 100 housing units each, and therefore should offer significant family housing. This highlights a central paradox in the Council's housing policy which is brought about by the decision to concentrate new housing in the IA: The most urgent need is for family housing but the housing offered by the new residential developments in the IA will be unsuitable for families. Given that we are now stuck with this policy, the best way of solving the paradox is to ensure that some housing on these sites is of a more suitable, low rise design. This would also avoid social segregation in the IA, and the need for tall buildings (see below).</p>	Family housing	
25	5.1.32	<p>Para 5.1.32 envisages the possible need for compromises in matters of privacy and amenity for homes in the Intensification Area where housing densities will be higher than elsewhere in the</p>	Density	<p>Agreed. Paragraph D has been deleted. Having regard to the comments made, Policy F and the supporting text has been amended to address proposals for the potential</p>

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		borough. AAP 5D says that London Plan housing densities might be exceeded in those instances where '... development proposals exhibit exceptional design and the achievement of higher amenity and environmental standards and will make an appropriate contribution to on and off-site infrastructure provision ...'. The message to developers here seems clear: 'in return for a bit more Section 106 money, feel free to pack 'em in.' We are strongly opposed to any move to exceed London Plan densities and to any sort of trade-off between "traditional concepts of privacy and amenity" which we regard as short sighted at the very least. The future success of Harrow depends on it being seen as a good place to live		'over development' of sites. In addition, Paragraph 5.1.32 has been amended to ensure all development is required to meet the appropriate standards.
9	Para 5.1.39	There is no guidance provide in Chapter 6. There needs to be a Design Guide.	Design Guide	Development guidance is provided by the Policies of Chapter 5. Chapter 6 covers allocations and site specific development parameters. Amendments have been made to the AAP to clarify this

AAP Policy 6

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 6 (C)	<p>a. AAP6/C. the Views Assessment offers no opportunity for tall buildings in Harrow Town Centre.</p> <p>b. It is very unlikely that developments in Harrow will be of exceptional architectural quality and design. The rental values will not allow this.</p> <p>d. Tall buildings will never achieve a positive relationship with Harrow on The Hill.</p> <p>e. Tall buildings will never enhance the skyline.</p> <p>f. All buildings should secure a complete and well designed selling at street level. Tall is not relevant.</p>	<p>Views</p> <p>Architectural quality and design</p> <p>Relationship to Harrow Hill</p> <p>All buildings</p>	<p>The Views Assessment includes cones, corridors, and heights and therefore enables clarity around where taller development may or may not be appropriate.</p> <p>It is disappointing that one of the leading local architects maintains a view that exceptional architectural quality and design cannot be delivered in Harrow. If this is the case, then development is unlikely to receive support or planning permission.</p> <p>The Planning Inspectorate and Secretary of State have already agreed in principal that a 19 storey building of exceptional architecture and design is appropriate in the context of Harrow Hill. It is within this context that the</p>

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			to secure a complete and well designed setting at street level	AAP policies must work. At ground level, the policy is about providing a setting within which a tall building must connect with including the provision of public realm, which is not necessarily a requirement of other forms of development.
9	Policy AAP 6 (E)	"will be rejected" rather than "resisted".	Reject rather than resist	Agreed. Policy amended to state refused
36	AAP Policy 6	<p>This topic was the one that raised most concern from residents during the consultations on both the Core Strategy and the earlier draft of the AAP. In the end the core Strategy was left vague and we were promised more detailed treatment in the AAP, but Policy AAP6 (Development Height) fails to deliver this. In the earlier section headed 'Opportunities', paragraph 3.5 tells us that 'achieving the Core Strategy targets will require taller buildings'. Why? There are plenty of examples of high quality, low rise developments in inner London boroughs which deliver high density housing while remaining on a human scale (e.g. the Camden projects overseen by Sydney Cook and the Donnybrook Quarter in Bow).</p> <p>Table 6.3 shows that the expected output total for housing just from the sites already identified in the IA, is substantially higher than the target stated in the Core Strategy. If this unnecessary extra burden was reduced the need for high density housing would also be reduced.</p> <p>Elsewhere in the AAP there are suggestions that tall 'landmark' buildings are necessary to reflect the metropolitan status of the town centre, but the success of a town depends much more on how well its buildings work for the people that use them, than on their visual impact. Beware white elephants.</p>	Lack of guidance on tall buildings – also not necessary for high density design	<p>Policy AAP6 has been substantially revised to take on board the comments regarding the requirement for detailed treatment.</p> <p>The AAP has also been amended to clarify that taller buildings are required to achieve the Core Strategy targets, with taller buildings being defined as those 2 or more storeys higher than that of the predominant surrounding building height. Taller building are necessary because all of the sites are brownfield sites (i.e. they all ready have development on them) however, most require either a change of use or intensification (i.e. taller more dense development) to make redevelopment viable.</p> <p>It needs to be noted that the target is a minimum target. Also, a higher housing output than target is required to provide certainty that the target can be delivered should one or more of the allocated sites not come forward over the plan period. It also ensures that inappropriate development proposals on allocated or other sites can be resisted. In all instances, housing within the AAP is enabling development to deliver currently unviable employment or social and physical infrastructure.</p> <p>Agreed, see amendments to AAP6, which establishes the form and function of tall buildings.</p>
24	AAP Policy 6	Area Action Plan Policy AAP6, in conjunction with site specific	Tall buildings	Support for approach noted

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		<p>guidance in Chapter 6, addresses the approach to development height within the intensification area. The Council's intention of using this policy to carefully manage the development of tall buildings within the intensification area through the identification of appropriate, sensitive and inappropriate locations is supported in accordance with London Plan Policy 7.7.</p> <p>The cross-reference to detailed site specific guidance in later sections is supported, as is the intention to provide guidance for proposals coming forward on non-allocated sites. The operation of this policy, in conjunction with AAP8 on local views, will be key to the successful delivery of the high quality interventions envisaged. The Council is invited to consider how a single strategic diagram (identifying protected views and constraints, sensitive areas, and opportunity sites within the intensification area) could help to reinforce the relationship between these policies, and provide additional indicative guidance for non-allocated sites. Officers would welcome the opportunity for further informal engagement on the development of this policy, and its relationship with AAP8, ahead of the next stage of consultation.</p>	Views	A diagram of the new views, including base map and the opportunity sites, is included.
49	AAP Policy 6	<p>The above comments in respect of height are considered to fit with the objectives of Policy AAP6 which encourages tall / landmark buildings in appropriate locations. Given the requirements of an urban design analysis to be provided with proposals for tall buildings, it would be useful within AAP6 to define over what height a "tall building" would be considered such.</p>	Define the height of tall buildings	Definitions are provided for tall and taller buildings within the supporting text to Policy AAP6
54	AAP Policy 6	<p>In general we welcome this policy subject to an explicit reference to the need for tall building proposals being considered against the impact they may have upon the significance of heritage assets. This would reflect EH/CABE Guidance on Tall Buildings (2007) and the London Plan (2011) policy 7.7.</p>	Add reference to impact on heritage assets	The Policy includes reference to compliance with Policy 7.7 of the London Plan, and therefore does not need to repeat the criteria therein.
32	AAP Policy 6	<p>Policy AAP 6 deals with development height and comments (AAP6 A) that the appropriate height of development of opportunity sites within the Intensification Area will be guided by the parameters set out for each site in Chapter 6 of the AAP. We would comment that</p>	Parameters don't specify height	Parameters have been amended to specify building heights, which have been informed by the Council's urban design analysis.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
32	AAP Policy 6	<p>the design considerations section for each site provides no parameter for height and the only indication within each section is an annotation on the associated 'Figure'. These figures are annotated 'Potential Site layout of preferred option' (our emphasis) and are not identified as setting parameters. In addition, not all sites have an associated 'Figure' or any text in the design considerations section establishing the parameter. We would comment that if these figures are intended to constitute the parameters then this would overly restrict design development and would not allow the undertaking of a proper urban design analysis to be undertaken to establish what might be the most appropriate form of development for a site.</p> <p>AAP6 C confirms that proposals for tall buildings will be considered within the criteria set out in the London Plan as well as accord with the limits set out in the Development Management DPD, local and strategic views, as well as a number of other local criteria. Having regard to the 'local criteria' we would comment that in the absence of the Development Management DPD (APP Ca) it is not possible to consider the implications of this policy fully or on the opportunity sites identified within the AAP. We would also comment that the relevant polices/limits should be contained solely within the AAP DPD given that's its purpose is to provide the policy framework for the AAP. The document should be amended accordingly.</p> <p>Criteria APP6 Cc proposes public access to rooftops or top floors of all tall buildings. This requirement is considered inappropriate and accordingly our client objects for a number of reasons, including:</p> <ul style="list-style-type: none"> □ There is no policy basis for such requirement. The London Plan states that tall buildings should incorporate publically accessible areas on the upper floors, where appropriate. This is wholly different to the draft wording of Policy APP6 which states that public access to the rooftop or top floor should be provided. □ The definition of a tall building within the London Plan and within 	<p>Figures could be overly restrictive and prevent proper deign analysis of the site</p> <p>Relevant polices/limits should be contained solely within the AAP DPD</p> <p>Oppose rooftop access requirement</p>	<p>Disagree. Most of the view corridors begin and terminate outside of the Heart of Harrow area but could be impacted upon by development both within and without of the area. For consistency, and avoiding repetition, it is best to have these contained in one policy in the Development Management Polices DPD.</p> <p>Reference to rooftop access has been deleted. London Plan policy includes a requirement that proposals for tall buildings should incorporate publically accessible areas on the upper floors, where appropriate.</p>

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32	AAP Policy 6	<p>Harrow's Core Strategy is hugely different. The implication of draft Policy APP6 is that any building circa 10 storeys should have a publicly accessible rooftop or top floor. This is wholly unrealistic. The objective of the London Plan seeks to ensure that taller buildings (which are by its own definition substantially taller than their surroundings or make a significant change to the skyline) have public accessibility, however this is easily incorporated in central London where the majority of tall buildings (by London Plan definition) are proposed in the form of restaurants, hotels, bars etc. It is unrealistic to expect this to be in anyway commercially viable in Harrow let alone in every building of 10 storeys or over.</p> <p>□The requirement fails to have consideration to the context in which the building is located or its proposed purpose/use and could, as a result, lead to a development that fails to delivery or maximises on the provision of wider or better opportunities including, for example, enhanced ground level public realm;</p> <p>□Rooftops are invariably the locations for the provision of sustainable and renewable energy (Photovoltaics), for green/brown roofs to support biodiversity or the location of communal open space for residential occupiers. Public access would compromise each of these and potentially lead to conflicts with other statutory development plan policy requirements, including for example Policy AAP 12 and improving biodiversity opportunities;</p> <p>□The provision of public access, and associated health and safety requirements, will place an inappropriate additional cost on a development and give rise to on-going public liability and maintenance requirements that would need to be borne. In the case of a predominantly residential block, this would be by residential occupiers (including affordable housing occupants) through service charges. It will also give rise, specifically in residential buildings, to issues of privacy and security for residential occupiers. The cost of providing a publicly accessible viewing area in this context would be a community benefit and would therefore need to be factored into a viability assessment</p>	Oppose rooftop access requirement	<p>Reference to rooftop access has been deleted. London Plan policy includes a requirement that proposals for tall buildings should incorporate publically accessible areas on the upper floors, where appropriate.</p> <p>The criteria of Policy AAP6 have been amended to provide greater clarity over the requirements for tall buildings in the Heart of Harrow, responding to the concerns raised in the vast majority of representations received.</p>

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		<p>and/or offset against other community benefits delivered by a proposal. This would only seek to draw developer contributions towards providing wasted, under used spaces.</p> <p>In the context of public access to the top of tall building, our client is significantly disappointed that this has never been raised in previous discussions, particularly given paragraph 1.4.5 which claims that the involvement of private developers has enabled the proposals to be moderated through knowledge of the likely means of implementation. This clearly has not been the case and as our client has the only site in the AAP area where the principle of a tall building has been established, public accessibility should have been mentioned during the on-going discussions with the Council.</p> <p>With respect to Criteria APP6 Cd, e and f these are a matter for the urban design analysis which should, in addition, demonstrate how a proposal responds to these criteria. Accordingly we consider that these elements should be deleted and APP6 D amended to read:</p> <p><i>All proposals for tall buildings must be accompanied by an urban design analysis which sets out:</i></p> <p><i>a. how the proposed development relates to development adjoining each boundary, and surrounding topographical features;</i></p> <p><i>b. Contributes to the skyline;</i></p> <p><i>c. Integrates within the street scene particularly at ground level; and</i></p> <p><i>d. Includes an assessment of impacts upon local, medium and long-distance views and places.</i></p>	Amend AAP6 D as stated	
32	AAP6 E	<p>APP6 E refers to development of an inappropriate height and tall building proposals which conflict with the London Plan and the findings of the Local View Assessment (2012).</p> <p>The requirement to undertake a Local View Assessment formed part of our client's objection to the Core Strategy and the Council</p>	Objection to Views	The Council is satisfied that the Harrow Views Assessment (2012) is a robust piece of evidence that follows the methodology set out in the London Plan Views Management Framework.

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		<p><i>that whilst there would be a significant change in views it is important not to conflate visibility and harm (IR160). He agrees with the Inspector's conclusion that there is no objection in principle to tall buildings on the appeal site (IR171)."</i></p> <p>It is our client's view the failure of the Views Assessment to consider the implications of this appeal decision, the recommendation of the Inspector in assessing the physical evidence which had been properly tested in cross-examination, and the decision of the Secretary of State establishes that the View Assessment evidence is flawed. The Inspector at the Core Strategy EiP was explicit that the Secretary of State's decision was an over-riding material consideration to which considerable weight should be attached and which established the principle for 19-storeys on this site. The evidence presented within the View Assessment simply reiterates the arguments presented at the Inquiry. As with the Core Strategy, our clients are of the opinion that the Secretary of State's decision and acceptance of a tall building at this site should be explicitly stated and this should, in addition to elsewhere, be acknowledged within this section of the AAP (or in the Site Specific Section) accompanied by commentary drawn from the Inspector's Report and Secretary of State's decision, as appropriate.</p>	<p>Road</p> <p>Secretary of State's decision and acceptance of a tall building at this site should be explicitly stated</p>	<p>provided in the detail of the site allocation.</p>
32	AAP6 E	<p>Given our client's position in respect to this issue, they have commissioned 'Define' to carry out an analysis of the View Assessment Study that has been carried out and this is attached. This assessment makes it clear that the proposed maximum height restriction proposed within the View Assessment Study and reflected within the draft AAP contradicts the judgement made by the Secretary of State. Our client objects strongly to the approach adopted by the Council on this matter and in respect to the 51 College Road site and perceive it as an attempt to override the Secretary of State's position on the principle that a tall building, within the setting of the analysed views of the Views Assessment, would be acceptable. Our client considers that the AAP document should be amended to reflect the Secretary of State's position, as the Inspector at the Core Strategy EiP required on the Core</p>	<p>Secretary of State's decision and acceptance of a tall building at this site should be explicitly stated</p>	<p>The acknowledgement of the Secretary of States agreement to the acceptability of the principle of a tall building, up to 19 storeys high, on this appeal site is provided in the detail of the site allocation.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		Strategy, including appropriate references in the justifications to Policies AAP 6, 8 and others.		
9	Para 5.1.45	The Intensification Area is not potentially suitable for tall buildings.	No Tall Buildings	There may be instances where a tall building may be acceptable (i.e. the principle of this has already been established on the College Road site) but subject satisfying the revised criteria set out in Policy AAP6.
9	Para 5.1.46	The buildings that enjoy outstanding views over London should be identified. For many The Hill is in the way. If existing buildings offer these views then there is no need for taller buildings. The unique opportunity also exists from Harrow on The Hill. There is no justification for tall buildings based on the opportunity to help new London's spatial extent.	Identify existing buildings with views to London no justification for tall buildings	There may be instances where a tall building may be acceptable (i.e. the principle of this has already been established on the College Road site) but subject satisfying the revised criteria set out in Policy AAP6.
9	Para 5.1.47	This is impossible. There is no way the skyline of the Intensification Area should be enhanced by tall buildings. "Should" needs to be removed. "Might not".	Objection to tall buildings	There may be instances where a tall building may be acceptable (i.e. the principle of this has already been established on the College Road site) but subject satisfying the revised criteria set out in Policy AAP6.

AAP Policy 7

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 7 (C)	How can east west links be a priority if they cannot be achieved?	Viability of east west links	The Council acknowledges the physical barrier that the mainline railway line represents but considers that improvements can still be made to promote better east/west links. In addition to improvements to the underpass as part of the Kodak development, east/west links will be provided through the provision of a green link through the Zoom Leisure and Kodak site, through links from the Teachers Centre, through the Colart site onto the High Street, as well as provision for a future

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
				footbridge or underpass across the railway connecting the main Kodak site with Tudor Road.
29	AAP Policy 7	As per our comments above, the Council should give consideration of green infrastructure and soft landscaping where appropriate as part of a permeable public realm	Green infrastructure and landscaping	Policy AAP4 f has been amended and applies to all development in the Heart of Harrow including proposals for urban realm improvements.
19	5.1.51	Welcome (5.1.51) control over street clutter and rationalisation of street furniture, and control over A-boards and advertising (5.1.57). Note there is a conflict between the desire to reduce street clutter and the desire to improve signage (e.g. in para 6.5.3).	Potential conflict re de-cluttering and new signage	Support for control over street clutter and advertising boards is noted. The Council acknowledges the potential conflict re de-cluttering of streets and the provision of new way finding signage but considers this can be overcome through the design and integration of the way finding signage. Amendments have therefore been made in reference to the provision of way finding signage that this is to be designed so as not to add to street clutter.
9	Para 5.1.56	So how will a dark heavily trafficked underpass be improved?	Clarity	Better access, lighting, improved materials used within the underpass
9	Para 5.1.58	“Formation” should be changed to “protection and formation”.	Views	The use of the term ‘formation’ applies to potential views from within the Heart of Harrow that require development to take place to enable these to be realised. Only existing views can be protected.

AAP Policy 8

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 8 (A)	b. What does this mean? It should not suggest tall buildings.	Clarity	This part of the policy is intended to encourage development that adds interest to the suburban silhouette in front of the Harrow on the Hill Area of Special Character. Tall buildings may (or may not) add interest depending upon their design and siting amongst other considerations. Policy criteria for tall buildings is set out

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 8	The emerging approach to identify, conserve and manage local views, informed by the Harrow Views Assessment (2012), is broadly supported. The Council should, however, include a reference within Policy AAP8 to any associated policies within the Development Management DPD (where applicable), and identify the need for development proposals that would be subject to protected views to submit a views assessment.	Link to DM policies and add in requirements for views assessment	in Policy AAP6. The views and vistas development management policy is signposted at paragraph 5.2.11. As it has development plan status in its own right there is no need to make further, specific reference within Policy AAP 8.
54	AAP Policy 8	We welcome the policy and the supporting text, subject to the significance of the heritage assets being referenced in the policy wording. The inclusion of these key words will help ensure the policy reflects the concept and principles of PPS5.	Reference significance of Heritage assets	The Development Management Policies DPD includes policies for the consideration of impacts upon heritage assets that takes account of their significance in accordance with the NPPF. This AAP policy deals with the impact of development within the Heart of Harrow upon the Harrow on the Hill Area of Special Character, which is a character rather than a heritage designation.
9	Para 5.2.5	The silhouette and skyline is fine. It will not be improved without demolition of certain buildings. It cannot be improved by tall buildings for example. The Intensification Area does not require a new positive urban skyline.	Tall buildings and skyline	The Intensification Area will necessarily involve change to the skyline and this policy provides for its management to enhance rather than detract from the setting of the Area of Special Character. Policy AAP 6 deals with development height/tall buildings.
9	Para 5.2.6	How can the selling of Harrow on The Hill be enhanced by tall buildings, it cannot. The transparent dome of St George's is an eyesore, especially at night then it acts as a light bulb.	Tall buildings and skyline	The Intensification Area will necessarily involve change to the skyline and this policy provides for its management to enhance rather than detract from the setting of the Area of Special Character. Policy AAP 6 deals with development height/tall buildings.
9	Para 5.2.7	Harrow will never get world class architectural quality. When proposals for tall buildings come in they need to be assessed against other world class quality architecture by recognised design bodies.	Design assessment	The London Plan (Policy 7.7) requires tall buildings to incorporate the highest standards of architecture and materials. The Council will procure necessary expertise as required to assess proposals for tall buildings. Paragraph 5.2.7 amended to reflect London Plan policy wording.
9	Fig 5.1:	This figure needs to be at different scales so that the impact on the	Have a map	The local views identified for protection are identified in

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	proposed protected views	Intensification Area and Harrow Town Centre can be analysed more clearly. The thought that it has been contrived to allow Dandara tall buildings would be fraudulent.	at a larger scale	the Harrow Views Assessment (2012) and on the adopted policies map.
30	Section 5 Fig 5.1	<p>Given that there are three sub-areas to the Intensification Area which have their own identities and characteristics (Harrow Town Centre, Station Road and Wealdstone) there could possibly be a Design Guide produced for each area. These Design Guides could then help property owners and developers understand the maximum limits of density and height and an expectation on mix, massing and aesthetic quality.</p> <p>The viewing corridors indicated on Fig. 5.1 are extremely narrow and 'home in' purely on the church of St. Mary's and its' immediate surroundings. From various vantage points within the borough one can enjoy the church and its hill-top setting. It is the whole sky-line view of the Hill surmounted by the church in its' silvan surroundings that is the much cherished emblem of Harrow.</p> <p>Whilst it is understood that the viewing points have been reduced to purely public-accessed areas the viewing corridors should be increased in width to ensure that the Hill as a whole is not visually impaired by tall buildings from these few vantage points.</p> <p>The viewing point from the cricket ground next to the spinney (by Headstone Lane) in Headstone Manor Recreation Ground should be included as it is a fantastic view of the Hill from a public place.</p>	Produce design guides for the tree main sub areas	The provisions of this AAP ensure a sufficiently robust framework for the assessment of density, height and design of proposals in the Intensification Area. The Council does not intend to produce separate design guides.
			Increase viewing corridors widths	The viewing corridors are based on the Harrow Views Assessment (2012) which followed the recognised methodology of the London View Management Framework. By definition all views are dynamic and will change over time; however the protection of identified views in accordance with the Framework will <i>de facto</i> ensure that many existing non-protected views and glimpses of the Hill are retained.
			Additional viewing point proposed	This view was considered in the Views Assessment but was found not to meet the London View Management Framework criteria.
36	Fig 5.51	<p>Since production of the Core Strategy, the list of protected views has been updated and a version of the map contained in the Harrow Views Assessment (2011) is included in the AAP (Fig 5.1). In this version the view from Harrow Recreation Ground is wrongly labeled 'Roxborough Rd footbridge' and the views from the footbridge have been omitted.</p> <p>I do hope that having gone to the trouble and expense of producing this new document, it will be taken more seriously than the previous one, when considering the impact of proposed</p>	Incorrect labelling	Noted. The Views Assessment has been amended to correctly annotate Harrow Recreation Ground.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		developments.		
9	Para 5.2.10	Why is note 8 required? It relates to Policy DPD.	Check reference	The footnote is provided to assist the reader in relation to this paragraph.
24	AAP Policy 8	<p>Area Action Plan Policy AAP8 sets out the emerging approach to identifying, conserving and managing local views. This policy is informed by the Harrow Views Assessment (2012) and is broadly supported. In developing approaches to support the managed protection of these views the Council should draw from the detailed visual management guidance within the Harrow Views Assessment (2012) and incorporate associated assessment criteria within the Local Development Framework.</p> <p>The GLA understands that whilst the Harrow and Wealdstone Area Action Plan will set out development management policies that are specific to the intensification area, it is intended that this document will also act in conjunction with the Development Management Policies DPD. It is noted that whilst development within the intensification area would be most likely to impact on the views identified, proposed development outside of this area would also, potentially, be subject to protected views. Officers would, therefore, welcome the opportunity for further engagement with the Council as both of these DPDs are developed further, to determine where the relevant assessment criteria will reside, and to ensure the relationship is clear.</p>	None	Support noted – ongoing engagement welcomed.

AAP Policy 9

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Policy AAP9	We support the detailed references to encouraging the use of non potable water, preventing water pollution and preventing sewer flooding as set out in Policy AAP 9: Flood Risk and Sustainable Drainage within the Intensification Area and its supporting text. We	Apply policy to major residential development	The policy applies to Major development proposals, which by definition are proposals for 10 or more residential units. The supporting text has amended to refer to London Plan drainage hierarchy.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		would suggest the policy is applied to residential developments over 10+ and that reference is also made London Plan Policy 5.13 Sustainable Drainage.	and refer to LP policy	
24	AAP9 to 12	Area Action Plan policies AAP9 to AAP12 address matters of sustainability within the intensification area, and cover issues of flood risk and sustainable drainage, decentralised energy, provision of open space, and improving access to nature. These policies will supplement the overarching approach of the Harrow Core Strategy, and those in the Development Management Policies DPD, and are broadly supported.	Sustainable Development	Support is noted
24	AAP Policy 9	Broadly supported, the Council should, however, include a point under part C of this policy which identifies the requirement for development proposals to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so. London Plan Policy 5.13 provides a drainage hierarchy which the Council may wish to refer to within supporting text to provide further guidance with respect to SUDS.	SUDS	Agreed. Part C of the policy is amended to include the requirement to utilise SUDS and supporting text also amended to refer to London Plan drainage hierarchy.
29	AAP Policy 9	Natural England welcomes the provision of SUD's which can be included within green infrastructure provision.	None	Support is noted, also see amendments above
38	AAP Policy 9	<p>We are generally supportive of this policy but it could be strengthened with the following amendments</p> <p>Point C. a)</p> <p>We suggest you strengthen the wording of this bullet by including the following:</p> <p><i>“Reduce the surface water run-off rate of the site to Greenfield run-off rates wherever practicable.”</i></p> <p>Point D.</p> <p>This would be improved by changing the wording to:</p> <p><i>“In selecting the sustainable measure to be used, preference should be given to those that reduce demand for potable water</i></p>	Greenfield run off and water quality	Suggested amendments are agreed and duly made

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<i>and which contribute to biodiversity and improving water quality.”</i>		
40	AAP Policy 9	We would like to see more discussion of the rise in flood risk due to the increased amount of hard-standing required for vehicle parking. The policy should address this by promoting car-free development, prioritising garden space over parking space and, where parking space had to be provided, ensuring a suitably permeable surface.	Strengthen policy to reduce surface run off	Policy requires development to reduce the surface water run-off rate of the site to Greenfield run-off rates. To achieve this, new development will have to consider a range of appropriate measures, including utilizing sustainable urban drainage systems, permeable surfaces, green roofs and walls etc.
				No change
53	5.3	Chapter 5.3 opens a old can of worms. Environmental sustainability. It is very interesting to read the councils thoughts and facts on the flood plain that already have many houses blighted by flooding for many years. This Harrow Council have never admitted publicly that there is a flooding risk in East Wealdstone and the fact that many houses have been built in this area on a flood plain. Your policy AAP 9;E.... states that “Proposals that fail to reduce surface run off, or that would increase the risk of flooding or water pollution will be refused”. In the past Harrow Council have given planning permission for houses to be built on this marshy area. Victorian maps show the Byron Park and Byron Cemetery as the flood plain for all the surface water from the high ground on Harrow Wealds ridge. But building permission was still given by Harrow Council and this proposal of Intensification will repeat this terrible mistake and blight other people’s lives. Chapter 5.3.6 states Fluvial flooding represents only one flood risk in the urban environment... Historically flooding from other sources has been dealt with through the foul and surface water drainage system – a structural engineering problem. However the capacity of the system is now largely exhausted through population growth and increasing impermeability. How long have Harrow borough known this fact but put their heads in the sand? Now you want to further increase the population to further raise flood levels in many houses in North East Wealdstone. More people-more concrete-more flooding. And you call this sensible	Flooding in Wealdstone	To support the Core Strategy and the Area Action Plan, the Council has undertaken a detailed strategic flood risk assessment of the borough, which identifies areas at potential of flood risk. This has identified that parts of Wealdstone are at risk of flooding due to the culverted Wealdstone Brook. Further modelling work was undertaken as part of the AAP work and has involved both Environment Agency and Thames Water input – the latter being responsible for the foul drainage system. While national policy directs new development away from the natural flood plain, in urban areas such as Wealdstone, this approach is not practicable. Existing development in Wealdstone represents significant public and private investment. It’s regeneration is a key objective for the AAP and must therefore provide opportunities for redevelopment to enable this. The AAP seeks to ensure that the regeneration of Wealdstone takes account of existing flooding issues and addresses this through higher on-site requirements for new development as well as through provision for strategic flood mitigation measures, such as the proposal for deculverting and flood attenuation at Kenton Recreation Ground. Without new development, the existing flooding issues would not be addressed.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		progressive planning?		
53	5.3.17	Chapter 5.3.17 describes the only possible gleam of hope and common sense in the whole 192 pages of the plan. The deculverting of the Wealdstone Brook in Kenton Park Recreation ground, to provide a flood plain to help relieve the pressure elsewhere in the Borough. You state that this scheme needs to be investigated and its feasibility proven. I understood that the North Brent Integrated Urban Drainage pilot has investigated this avenue and found it a feasible proposition. Do you not have knowledge of this?	Feasibility of deculverting Kenton Rec	The Consultants commissioned to undertake our further detailed modelling and analysis of the flooding issues in Wealdstone are the consultants commissioned to undertake the Brent IUD. The Kenton Recreation Ground was historically a landfill site. While borehole samples have been undertaken of the Kenton Recreation Ground as part of that study, these were not comprehensive enough to understand the types and extent of waste that would require extraction and the remediation works necessary. Hence why further investigation is required.

AAP Policy 10

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
13	AAP Policy 10	AAP 10 H&W district energy network Good to see this!	District Energy Network	Support is noted
24	AAP Policy 10	Area Acton Plan Policy AAP10 seeks to promote decentralised energy within the intensification area, and whilst the emerging direction of travel of this policy is supported, the Council is advised that further refinement is required to ensure general conformity with London Plan Policy 5.6. The key area of concern relates to the definitions of 'small' and 'large' development in Policy AAP10 which do not appear to reflect the London Plan definition of 'major development' in Annex Five. The Council should note that the London Plan defines major development to be ten or more houses, or 1,000 sq.m. for all other uses. The Council must ensure Policy AAP10 is consistent with this approach so as not to inadvertently relax the requirements of London Plan Policy 5.6.	Conformity with London Plan Define small and large development in line with London Plan	GLA support for the promotion of the district heat network for the Heart of Harrow is noted. The suggested amendments are made to ensure conformity with the London Plan

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Further detailed comments and advice with respect to refinement of Area Action Plan Policy AAP10 is provided within Appendix One. GLA officers would welcome the opportunity to informally review subsequent drafts of this emerging policy in order to provide constructive feedback and reassurance to the Council ahead of the next consultation stage.</p> <p>Notwithstanding the above concern, the Council's intention to promote a district heat network for the intensification area is strongly supported. However, the GLA acknowledges that the scattered distribution of opportunity sites and spatial separation of major heat loads presents constraints to delivering a district heating network across the intensification area as a whole at this point in time.</p>		
24	AAP Policy 10	<p>Nevertheless, the Council is strongly encouraged to build on the approach emerging within the supporting text to this policy, and to promote the expansion of combined heat and power systems (where these come forward within development proposals) to reach beyond site boundaries in order to serve adjacent sites and uses in accordance with the principles of London Plan Policy 5.6. This would represent a pragmatic approach to bringing forward a local energy network, and would serve to improve the feasibility of CHP on a site by site basis by providing a greater critical mass of demand.</p>	<p>Promote the expansion of combined heat and power systems</p>	<p>Part C of the policy, and the supporting text, has been amended to consider opportunities on very large schemes for the potential of the on-site energy centre to serve both the needs of the site as well as adjacent sites and uses</p>
24	AAP Policy 10	<p>The definitions of 'small' and 'large' development in Policy AAP10 do not appear to reflect the London Plan definition of 'major development' in Annex Five. The Council should note that the London Plan defines major developments to be ten or more houses, or 1,000 sq.m. for all other uses. The Council must ensure Policy AAP10 is consistent with this approach so as not to inadvertently relax the requirements of London Plan Policy 5.6.</p>	<p>Define small and large development in line with LP</p>	<p>Amendments have been made to clarify that the policy applies to all new major development proposals.</p>
24	AAP Policy 10	<p>Reflecting the London Plan definition of 'major development', this Area Action Plan policy should seek to ensure that all major developments within the intensification area select energy systems in line with the decentralised energy hierarchy in London Plan</p>	<p>Decentralised energy hierarchy</p>	<p>The requirement for selecting energy systems in accordance with the London Plan energy hierarchy is already provided in Part B (Now Part D) of the policy. The previous parts of the policy have been amended to</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Policy 5.6. With this in mind the following should apply:</p> <p>All new major development should prioritise connection to existing or planned decentralised energy networks, where feasible. Where this is not feasible at present, development proposals should ensure the design of the development would facilitate connection in future.</p> <p>All new major development should investigate the scope for on-site heat networks linking all buildings on site (prioritising CHP where applicable) and served by a single energy centre.</p> <p>The Council is advised to state in supporting text that details of the energy centre and route of the piping network will be required to demonstrate accordance with the above points. The Council is also strongly encouraged to require major development proposals to examine opportunities to extend CHP systems beyond site boundaries to adjacent sites in accordance with the principles of London Plan Policy 5.6.</p>		<p>take account of the suggested policy amendments.</p> <p>The supporting text has also been amended to specify the requirements for demonstrating the compliance with the Policy</p>
40	AAP Policy 10	We welcome the proposals for district heating networks but would like to see ambitious targets, beyond the statutory minimum, for the energy rating of all new buildings.	Have more ambitious targets	There is no local justification, in terms of a robust evidence base requirement, to set higher targets for the energy rating of buildings beyond that prescribed in regulations.
47	AAP Policy 10	P.55 AAP10. Include additional policy to encourage Photovoltaic panels to be retro fitted on the many (significant) flat roofs of buildings in the IA. (see aerial photo on P.9 for scope of opportunity).	Additional policy re solar panels	Agreed. New policy added but not limited to just photovoltaic panels but in support of retrofitting energy efficiency measures, all appropriate types of renewable energy technologies, as well as opportunities to connect to or install on-site decentralised energy systems
24	5.3.20	With respect to paragraph 5.3.20, the Council should note that use of biomass to generate heat is subject to satisfying air quality standards in line with the Mayor's Air Quality Strategy.	Biomass caveat	A footnote has been added to clarify that the use of biomass to generate heat is subject to satisfying air quality standards in line with the Mayor's Air Quality Strategy

AAP Policy 11

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 11	Broadly supported in accordance with the principles of London Plan Policy 7.18. With respect to paragraph 5.4.3, the Council is advised to reword the third sentence as follows: <i>“The recommended standard of provision set out in the PPG 17 Study of 4 square metres per child will be sought as a minimum, with an aspiration to achieve the 10 square metre per child provision as identified within the Mayor of London’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’.”</i>	Play space standards	Agreed, amendment to the supporting text is made
28	AAP Policy 11	Open space in Harrow should allow cycling on useful link routes, with widening of paths if necessary, as in Kenton Recreation Ground. These routes should avoid having barriers or gates that force cyclists to dismount. Routes through West Harrow recreation ground (Wilson Gardens to Ridgeway / Welbeck Road) and Harrow recreation ground (Hindes Road to Beresford Road) can be implemented for very little cost.	Cycle routes through open space	Agreed. However this is more to do with proposals for the improvement of existing parks and open spaces, and therefore is more applicable for inclusion in the Infrastructure Delivery Plan. An update of the IDP is currently underway, and therefore the comment has been included in the section on open space as a further consideration in preparing bids and proposals.
29	AAP Policy 11	Natural England welcomes and encourages this policy and is please harrow Green Grid.	Open space and Green Grid	Support for the policy is noted
40	AAP Policy 11	We welcome these policies, though feel that special attention needs to paid to places where a green corridor crosses a busy road in order to ensure that walkers and cyclists can cross safely and conveniently and wildlife casualties are minimised. If, as we hope, a 20 mph limit is imposed, zebra crossings on raised platforms with associated landscaping would suffice in many places. The value of railway lines a wildlife corridors should also be considered.	Road crossings from a green corridor Railway biodiversity	Support for the policy is noted. Amendments have been made the text regarding Harrow’s Green Grid to address the concern raised. As previously noted, the 20 mph limit is not supported. The importance of railway land to Harrow’s biodiversity is already acknowledged in the Harrow Biodiversity Action Plan
50	AAP Policy 11	Policy AAP 11 seeks to assess the provision of open space within the Intensification Area. Land Securities acknowledge and welcome the flexibility of Criteria C of this policy which states that “all major residential development will be required to contribute to improvements to the quality and/or carrying capacity of outdoor sports pitches that serve, but <u>may not necessarily be inside the</u>	Criteria C	Support is noted.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		Intensification Area.”		

AAP Policy 12

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 12	Broadly supported, however, the Council are encourage to develop the detail of this policy further, and to draw from the principles identified within the supporting text and Harrow Biodiversity Action Plan (2008), to identify specific objectives for the intensification area within the policy box. With respect to paragraph 5.4.11, the Council are encouraged to refer to “ <i>living roofs and walls</i> ” rather than “ <i>green roofs</i> ” as the former covers a wider range of habitats.	<p>Include more detail</p> <p>Change reference to green roofs</p>	<p>Agreed. Amendments have been made to the policy but in preference to identifying specific objectives to prioritise the achievement of actions outlined within the Harrow Biodiversity Action Plan – which are numerous and therefore provide scope for delivery and achievement on all major development sites, without necessarily limiting this choice through the policy.</p> <p>Amendment made in respect of living roofs and walls.</p>
29	AAP Policy 12	Natural England supports this policy and would recommend the Council give consideration to linking this to increased access to and between existing sites.	Improved access to and between existing SINCs	This is part of the principles underpinning the Harrow Green Grid, the delivery of which is referred to through the document.

AAP Policy 13

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
17	AAP Policy 13	<p>Looking at section 5.5 of the draft AAP (Policy AAP 13 Housing), could I make the following comments:</p> <p>Para C. The reference to 60% 'social' homes should now be 'social / affordable rented' homes - as per proposed amendments to the LP that are out for consultation now.</p> <p>Also - the reference to low-cost market housing. Low Cost Market Housing is not within the PPS3 definition of affordable housing.</p>	<p>Affordable rent</p> <p>Remove reference to Low Cost market</p>	<p>The reference to the new affordable rent tenure, as part of social housing, has been made.</p> <p>The reference to low cost market housing has been deleted in both Part C & D of the policy</p>

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		<p>However, if there is a mechanism in place to recycle the initial subsidy for new affordable housing or if the discount is retained in perpetuity on the property then it is affordable housing. So it's not that clear cut. Perhaps better to delete the reference to LCM housing or reword it so as not to suggest that it is automatically considered as affordable.</p>	housing	
24	AAP Policy 13	<p>Para D - maybe delete the bit in bracketsor it should be 'social / affordable rented or intermediate homes'.</p> <p>The preferred option draft Harrow and Wealdstone Area Action Plan identifies potential for the delivery of 2,800 homes within the Harrow and Wealdstone intensification area up to 2026. This figure is supported by the post examination stage Harrow Core Strategy, for which the Planning Inspector's report has been published. The Inspector's report finds the 2,800 home target for the intensification area to be appropriate for the plan period.</p> <p>Whilst officers have noted that this target would exceed the indicative minimum housing capacity of 1,500 homes identified by the London Plan, the GLA has strongly supported the Council's intention to exceed the minimum housing figures for the intensification area. Furthermore, the GLA is satisfied that the Council's target figure is well founded within local capacity, and, supported by the emerging Local Development Framework, represents a sustainable approach for accommodating the housing needs of the intensification area over the plan period.</p> <p>Policy AAP13 of the Area Action Plan sets out the approach to delivering the new homes envisaged for the intensification area, with Policy AAP5 providing supporting guidance on density. The thrust of the housing policies within the Area Action Plan, which would work in conjunction with housing policy within the Harrow Core Strategy and Development Management Policies DPD, is broadly supported in accordance with the London Plan.</p>	Housing target	Support is noted
24	AAP 13	<p>With respect to tenure split of affordable housing, Area Action Plan Policy AAP13 promotes a balance of 60 : 40 (social rent/affordable</p>	Tenure split in	Further discussion is welcomed

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
28	AAP Policy 13	All new flats / houses must provide bicycle parking e.g. secure shed / cage, or alley way for access to back garden	Cycle parking	Cycle parking standards and secure storage facilities are addressed in AAP Policy 19H. It is not necessary to repeat these again within this policy
29	AAP Policy 13	I would refer to our comments above in respect of accessible natural green space standards.	ANGST Standards	Refer to Council response made to the comment in respect chapter 4 and the applicability of ANGST to London, Harrow and the AAP area.
49	AAP Policy 13	<p>The affordable housing split within Central Wealdstone set out in AAP13 would be accepted, whereby there would be a focus on low-cost housing at this location above social rented.</p> <p>Other general policies are not necessarily of relevance to our client, but all seem to be in accordance with strategic London Plan policies and / or those in the Core Strategy</p>	Tenure split in Wealdstone	Support for the departure in the 60:40 affordable housing split for the Central Wealdstone central area is noted, although it should also be noted that reference to low-cost housing has been deleted in response to comments made by Council's own housing department (see first comment and response to this policy provided above).
32	AAP Policy 13	<p>Policy AAP 13 relates to housing and seeks to provide for a range of housing types and sizes, commensurate to the character of the sub area in which it is located. This is further discussed in the reasoned justification paragraph 5.5.2. It is welcomed that the policy recognises site and local circumstances may influence the mix of units that is appropriate within a specific development. This should also be reflected within the requirement for larger schemes to provide a greater proportion of larger sized units, having regard to the specific environment of the site and the requirements (amenity space, parking, privacy) generally sought for larger units, both within the different parts of the Intensification Area and the borough as a whole.</p> <p>Paragraph 5.5.6 refers to affordable housing provision and references the Borough wide target of 40% highlighting that the Intensification Area provides the capacity to deliver a substantial proportion of this.</p> <p>However, the Intensification Area, though the draft AAP, both seeks and requires a substantial increase in infrastructure, community benefits and public realm improvements. Affordable housing provision therefore needs to be balanced against other</p>	<p>Site and local circumstance</p> <p>Balance of affordable housing provision and other necessary infrastructure</p>	<p>Support for the policy recognition to site circumstances is noted</p> <p>The supporting text at paragraph 5.5.5 is clear that the final mix, in terms of types and size of housing to be provided on individual schemes will be determined through pre-application discussions, having regard to sites specifics and scheme viability. Further, the Harrow CIL currently being prepared to provide top-up funding for the infrastructure required to serve new development within the AAP area, takes account of development viability.</p>

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
40	AAP Policy 13	<p>priorities within the Intensification Area to ensure the appropriate infrastructure and an attractive environment is delivered to support the level of development the Intensification Area needs to deliver and to encourage continued investment.</p> <p>We welcome the principle that 'homes of different tenures are both integrated and visually indistinguishable from one another' but are worried about references in the supporting text (e.g. 5.5.3) to 2 and 3 bedroom flats meeting the needs both 'of young families and sharing professional households'. This does not sound like a suitable environment for bringing up young children and, especially in view of benefit changes, could quickly lead to very overcrowded conditions and associated social problems within the private rented sector.</p> <p>We are also concerned about paragraph 5.5.8. We are aware that analysis by the Council's housing department has shown that houses in Harrow of three or more bedrooms meeting the Government's new definition of 'affordable' rented housing would be too expensive for the majority of families. We agree with housing officers that this should make the Council reluctant to support any schemes from social landlords for larger housing units at 80% of market rent.</p> <p>There is clearly a grave danger that the Council's planning policies will fail to deliver any development that meets Harrow's most pressing housing need – high-quality homes that ordinary families can actually afford. Unlike some other environmental organisations, Harrow Friends of the Earth has not adopted a policy of blanket opposition to any increase in the amount of housing in the Borough. We might have reacted differently had we felt that the Core Strategy would do little or nothing to meet real housing needs and would benefit only property speculators, absentee landlords and the most affluent of residents.</p>	<p>Family flatted units</p> <p>Affordable rent model</p>	<p>With regard to paragraph 5.5.2, this states that developments over 100+ units should provide a greater portion of larger units (3+ bedrooms). This is not concerned so much with provision of family housing but rather housing choice and provision of a mix of housing, including larger flatted units, which will meet the needs of some 'family units' within the borough, especially those who may not be able to afford a 3 bedroom + house with a private garden, or those whose children are young adults and are home infrequently, or older persons who want/need a central local and do not want a garden but want bedrooms to allow family/grandchildren to stay. Provision of family housing within the Heart of Harrow is to be made on allocated sites outside of the town centres, such as Zoom Leisure and Kodak, Colart and the Leisure Centre sites.</p> <p>In respect of the new affordable rent model, the Council's Housing Strategy sets out an approach that seeks a blended rate, with 1 and 2 bedroom affordable dwellings being 80% and 70% of market rents respectively and 3 + bedrooms being aligned more to social rents. This blended rate seeks to ensure affordable housing is affordable in a Harrow context. The AAP housing policy does not prevent the Council from applying or seeking this blended rate in the context of the amount and affordable housing tenure to be secured on new development. (See comment below)</p>
17	5.5.2	<p>We're currently reviewing our target bedsize mix for social / affordable rented units - how can I link this in here? It will be included in the new Affordable Housing Policy and the Housing Strategy - does that provide a workable link? Should these be</p>	<p>Affordable rent model</p>	<p>A new paragraph has been added to the supporting text that follows on from the commentary on affordable tenure split and makes reference to the Council Housing Strategy and the requirement therein for a blended rate</p>

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		referenced in 5.5.7? I'd like to link them clearly so that we have a target mix in place to reflect our affordable housing need here in Housing - but making sure it fits in with the objectives in AAP 13.		to ensure affordable housing remains affordable in a Harrow context.
17	5.5.8	5.5.8 should be '60% social / affordable rented' as above. Also the low cost market housing issue as above. Better to say that 'affordable housing' now includes affordable rent rather than saying the 'social' component, as that matches PPS3 etc.	Revise for consistency	Agreed and suggested amendments made
20	5.5.6	We recommend an additional clause is added that this is subject to the proviso that the appropriate amount of affordable housing in a particular scheme depends upon its viability.	Add clause for Viability	The consideration of scheme viability and the mix and amount of affordable housing to be secure on individual sites is already included in the proceeding paragraph

AAP Policy 14

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 14 (A)	The description of the Wealdstone Strategy Industrial location should be identified earlier than in 5.6.1.	Describe SIL earlier in document	Disagree. While this is a strategic London Plan designation, the Wealdstone SIL only applies to the main Kodak site and the adjoining Waverley Industrial Estate. The preceding chapters deal with the decline in industrial use and demand within Wealdstone, which applies equally to all existing industrial sites regardless of designation
24	AAP Policy 14	<p>The approach presented by Area Action Plan Policy AAP14 promotes a requirement for robust economic analysis to justify consolidation of the Wealdstone SIL, with the burden on a future developer to provide this justification, in support of a comprehensive employment-led redevelopment.</p> <p>The GLA broadly supports the approach of Policy AAP14, in accordance with the principles of London Plan Policy 2.17, as a positive and pragmatic approach to managing change within the Wealdstone preferred industrial location, and promoting the aspirations for the intensification area, following the continued</p>	Consolidation of the Wealdstone SIL	Support is noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 14	<p>consolidation in the operations of Kodak Ltd.</p> <p>The approach to consolidation of the Wealdstone preferred industrial location, identified as a strategic industrial location by London Plan Policy 2.17, is supported as a positive and pragmatic approach to managing change in this location following the ongoing consolidation in the operations of Kodak Ltd. At opportunity site 2.</p> <p>With respect to the detail of Policy AAP14, the requirement for robust economic analysis to justify consolidation, and the stated need to ensure accordance with London Plan Policy 2.17 is particularly supported. The cross-reference to detailed site specific guidance in Chapter 6 is also welcomed.</p> <p>Representations on the guidance for opportunity site 2, within Chapter 6, are provided within comment 23 of this appendix.</p>	Consolidation of the Wealdstone SIL	Support is noted
47	AAP Policy 14	<p>P.64 AAP14 item Ah. I may have misunderstood this – could this constraint put the economic development of the location at risk? A more pro-active approach is suggested by way of finding the necessary measures to counteract this? Should the wording be more along the lines of AAP15 item Be?</p>	Traffic impacts	Agreed. Part A(h) of the policy is amended to be more along the lines of Policy AAP15 B(e).
50	AAP Policy 14	<p>Policy AAP14 outlines the criteria by which the Council will assess a proposal for the consolidation of the Wealdstone Strategic Industrial Location. Whilst Land Securities broadly support the principles of this policy we have concerns regarding criteria F of policy AAP 14 and paragraph 5.6.8 in the supporting text.</p> <p>Criteria F of Policy AAP 14 states that <i>“flexibility is included in the latter stages of the proposal to enable further provision in area and/or floorspace in business or industrial use should earlier phases be successful in attracting additional demand.”</i></p> <p>Further to this paragraph 5.6.8, states that <i>“the development of the Kodak site is only likely to be realised through detailed applications of various phased components. It is important that if employment provision in the first phases is successful, that</i></p>	Requirement to review or revisit the amount of employment floorspace	Given that the Council has now had the opportunity to review the proposed phasing of the development, it is clear that the vast majority of the industrial and business floorspace is to be delivered in the final phase of the development. On the basis that the phasing has largely been agreed, and with limited SIL compliant employment uses provided in earlier phases upon which to benchmark success or further demand, it would seem that the proposed policy requirement for flexibility and review would be frustrated.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p><i>flexibility is retained to modify the latter phases of the masterplan to enable a greater level of employment floorspace to be provided, which may require a greater portion of the SIL to be retained than initially proposed. For this reason, the consolidation of the SIL designation boundary will only be confirmed upon the successful completion of each phase of the masterplan.”</i></p> <p>Land Securities do not believe that a requirement to review or revisit the amount of floorspace beyond that set within the approved parameters of an extant and robust planning permission the proposals for which have been assessed under the EIA Regulations would be appropriate nor would they comply with the various statutory provisions. Therefore we request that this is removed from the AAP.</p>		

AAP Policy 15

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 15	What is the definition of the Business Section in Wealdstone?	Definition	Small and medium sized business and industrial uses with no one, dominant or underpinning specific sector – although the service sector is projected to provide the greatest opportunities for growth.
9	Policy AAP 15 (B)	What about business and industrial sites not identified in Chapter 6? Surely they are equally important and should have a policy.	Non allocated business sites should have a policy	Such sites are provided for in Part C of the Policy
24	AAP Policy 15	<p>Broadly supported as a positive and pragmatic approach to promoting the rejuvenation of local business and employment space within Wealdstone, and contributing to the renewal of the town centre.</p> <p>Whilst the requirement for mixed uses to enable the retention, renewal or intensification of business and employment space is implicit within the policy content and supporting text, for the clarity</p>	Enabling development	<p>Support is noted</p> <p>Recommended changes are agreed and amendments made</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		the Council may wish reword the start of parts B and C of this policy as follows: <i>“Proposals for enabling mixed use development...”</i> .		
33	AAP Policy 15	The MOPC/MPS support Policy AAP 15 which requires applicants for mixed use developments on employment sites to demonstrate that efforts to secure essential community infrastructure not appropriate for town centre locations (e.g. police patrol bases, custody centres) have been explored but have not been successful. This is consistent with current planning policies and should therefore be retained.	Community uses explored	Support for the policy is noted. This requirement will be retained
55	AAP Policy 15	<p>Policy AAP 15: Supporting the Business Sector in Wealdstone states that mixed use development on “... <i>other designated business and industrial land ...</i>”, will generally be supported.</p> <p>It is requested that Policy AAP 15 is altered so that it is not so rigid and generalised so that it can take into account site specific issues. This applies particularly to part B, C of the Policy as it is perceived to be unreasonable to require that land and buildings have been, “... <i>vacant for a period of at least 24 months;</i>”. This would be highly uneconomical and a waste of land and buildings which could otherwise be in operation and working effectively. Furthermore this would limit the ability of our client to remain within the Borough.</p> <p>A residential-led mixed use scheme on the Site would be in accordance with Policy as it would secure the retention of an existing business and employer in the Borough and would provide a higher standard of design and amenity whilst assisting the Council in reaching their housing targets.</p>	Increase flexibility of policy re 24 month requirement	<p>The policy is intentionally rigid. As set out in the Employment Land Review (ELR) and the Core Strategy, Harrow has a small and finite amount of designated industrial and business use land within the borough in comparison to neighbouring authorities. The vast majority of the industrial and business use land is within the Heart of Harrow area around Wealdstone. The ELR suggests need for such land will continue to diminish, and goes on further to suggest a potential surplus of 8ha over the life of the plan. The consolidation of the Kodak SIL and the allocation of Colart take account of the projected surplus. Therefore, any further release for enabling mixed use development must be robustly justified. Site specific circumstances can be taken into account as a material consideration.</p> <p>The merits or otherwise of a residential-led scheme on this site remain untested. However, the respondent should note the inclusion of the site within the extended boundary of the Teachers Centre site (opportunity site 4). Further discussions with the landowner are required to understand the long-term possibility for this site.</p>
20	5.6.20	We consider that this should be expanded to refer to the type as well as the number of potential jobs. Consequently we recommend that an additional clause is added that proposals should either	provide equivalent employment	Not agreed. The overall aim of the enabling development argument is to secure job numbers sufficient to meet the AAP jobs target

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		provide an equivalent employment yield or smaller scale space with flexible terms which is specifically designed to accommodate SME's.	yield or smaller scale space with flexible terms	

AAP Policy 16

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 16 (D)	What does this mean?	Define	Means that proposals for the redevelopment or change of use of offices of less than 1,000 sqm of floorspace within Harrow town centre will be permitted where the building is no longer fit for purpose, having regard to age, condition, period of vacancy, local market needs etc, and it can be demonstrated that there is a surplus of similar office space in the local market area. It is preferable to reference the Development Management DPD policy than repeat it, and the reasoned justification, again in the AAP.
33	AAP Policy 16	The MOPC/MPS support Policy AAP 16 which recognises emergency services with a public counter (such as police stations) as appropriate uses within Harrow Town Centre. This is consistent with strategic and local planning policies and should be retained within the emerging AAP.	None	Support is noted

AAP Policy 17

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 17	Where is the Harrow Primary Shopping Area located? What proposal map? What is an allocated site?	Clarification	These various designations, and the extent of each, is shown on the proposals map. The proposals map simply displays the Policies in the Plan as they apply to different

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
47	AAP Policy 17	<p>Da: What is the centre?</p> <p>P.71 AAP17 Item C. This concept should be extended to encourage canopies along all retail/other non-residential frontages i.e. existing buildings. In addition in suitable pedestrianised/mixed use areas there should be strategically sighted cross linked canopies where people can stay dry when crossing. There also should be in larger pedestrian areas canopied shelters for sitting and standing. There is a need for increasing canopy cover to take account of increasing amounts of heavy rain and sunshine (high UV – shade provision incl. trees) – this is particularly relevant for children. Link this to AAP7.</p>	Increase requirement for canopies / shelters	<p>sites and locations across the borough.</p> <p>Support for the policy is noted. Within pedestrian areas, such as public squares, the Council's preference is for trees to provide shade and cover rather than canopies.</p>

AAP Policy 18

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
50	AAP Policy 18	<p>Policy AAP 18 outlines the Council's proposed policy in respect of shopping outside Harrow Primary Shopping Area. We have three concerns about the section of Policy AAP17 which reads: '<i>Out of centre development that would impact upon any existing centres and be unsustainable will be refused.</i>'</p> <p>First, it is not clear whether this part of the policy applies to all development, only retail development, or all 'town centre uses' identified in PPS4 (or indeed other specific uses). This needs to be clarified.</p> <p>Second, it is inconsistent with PPS4, which sets out the Government's approach to the assessment of impact. PPS4 states at Policy EC17 that permission should be refused where 'there is <u>clear evidence</u> that the proposal is likely to lead to <u>significant adverse</u> impacts' (emphasis added). In short, for an application to be refused it is not enough for there to be an impact; that impact must be significant and there must be 'clear evidence' to show that there is an impact and what impact that would be. PPS4 places</p>	Retail	<p>Agreed, Policies AAP 17 and 18 have both been amended to clarify that AAP 17 deals with the Primary Shopping Area of both Harrow town centre and Wealdstone District Centre & sequentially, directs proposals for major retail development to locate within the Metropolitan centre, and to its core in the first instance. Preference is also given to sites allocated for major retail development in the AAP.</p> <p>AAP 18 has been amended to address appropriate uses, and the management of, secondary frontages, non-allocated town centre parades and neighbourhood parades.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>the onus on local authorities to demonstrate this in their decision making. The policy should be revised to reflect this.</p> <p>Third, the term 'unsustainable' is not defined. The term needs to be deleted or defined.</p> <p>Any changes to this policy in light of our comments will need to be reflected in the final sentence of paragraph 5.7.15.</p>		

AAP Policy 19

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 19	I do not believe this has been thought through holistically over the whole of the Intensification Area.	Parking	Concern is noted
24	AAP Policy 19	<p>TfL welcomes this policy which seeks to restrict non-residential car parking to disabled parking provision and operational requirements, and to ensure that the maximum residential parking standards contained in the London Plan are not exceeded. The policy correctly identifies the need to restrict car-use in the area to limit future negative impacts on the highway network given the existing and likely future congestion at local junctions as a result of development. This is consistent with London Plan Policy 6.13.</p> <p>Whilst restricting car use is one mechanism to encourage a modal shift towards more sustainable modes, Policy AAP19 should be strengthened to clarify that developers will be expected to contribute towards mitigating the cumulative impact of developments on the public transport networks, and to improve wayfinding and public realm.</p>	Mitigating the cumulative impact of development on the public transport networks	<p>Support for the policy is noted.</p> <p>Improvements to the public realm and wayfinding is addressed through Policy AAP7</p> <p>As set out in Chapter 7, the Council intends to adopt a local Community Infrastructure Levy which will fund various projects aimed at mitigating the cumulative impact of development and growth within the Heart of Harrow on the public transport network</p>
28	Policy AAP 19	All new road layouts and designs within a site should also conform to (as a minimum) the London Cycle Design Standards, or ideally provide higher quality cycle facilities as per the European guidelines.	London Cycle Design Standards	The requirement has been included in the list of considerations to be addressed through site Transport Assessments

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
40	AAP Policy 19	<p>Although it starts well with a welcome mention of 'car-free' in the opening paragraph, we believe that this policy is insufficiently radical. The supporting text acknowledges that there is already considerably more use of sustainable modes in the Intensification Area than elsewhere in the Borough. This needs to be built on with rather more urgency and imagination than this paragraph (5.8.2) suggests. We have already indicated in our opening remarks the policies we believe are necessary for an area being developed to this intensity.</p> <p>We would like to see the policy rewritten so that it prioritises access by sustainable modes, with particular emphasis on safe and attractive walking routes to other nearby facilities and to public transport. Safe cycle routes to a rather wider area should also be a priority.</p> <p>As well as 'hard' measures to enable sustainable modes and eliminate unnecessary car use, there is a need for 'soft' measures including individualised travel planning and easily understood information. Before committing themselves to buying or renting a new, intending residents should be made fully aware of restrictions on car use and opportunities for sustainable travel offered by the new development. Community involvement in site-specific travel planning is essential. Car clubs should be encouraged to use electric vehicles. Concessions on public transport fares for those willing to live a car-free lifestyle should also be considered.</p>	<p>More radical policy needed</p> <p>Prioritise access by sustainable transport</p> <p>Increase the information on 'soft' transport measures</p>	<p>Agreed that new major developments within the Heart of Harrow should prioritise access by sustainable modes. The Policy has therefore been amended to include this as the first policy requirement.</p> <p>In terms of the soft measures mentioned, the Policy already requires new development to contribute to the development and implementation of an area wide green travel plan for the Heart of Harrow as proposed by Policy AAP 20.</p>

AAP Policy 20

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 20	TfL supports the principle of creating an intensification area-wide green travel plan, which will assist in encourage a modal shift towards more sustainable modes in line with London Plan Policy 6.1.	Green Travel Plan	Support is noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
25	AAP Policy 20	Policy AAP 20 refers to an area-wide travel plan, which is very welcome providing it is effectively implemented to help reduce unnecessary car travel. Travel plans are often merely statements of good intent, which developers can circumvent or ignore. The Intensification Area will grind to a halt without an effective and enforceable travel plan.	Green Travel Plan	Support is noted as are the concerns with implementation.
28	AAP Policy 20	There should be plans to implement cycle network and pedestrian improvements even if no funding is immediately available. Commercial development should be asked to fund nearby pre-planned highway improvements. Massive improvements to the cycling infrastructure are required in order to attain high levels of cycle usage as in Holland.	Cycle and pedestrian improvements	Agreed. This is to be included in the Heart of Harrow Green Travel Plan and linked to the Infrastructure Delivery Plan and to further iterations of the Harrow Transport – Local Investment Plan.
40	AAP Policy 20	<p>We believe that it is very important to have an area-wide travel plan in place as soon as possible, so that developers can be aware of any site-specific requirements or constraints this entails and the new off-site infrastructure to which they would be expected to contribute.</p> <p>We welcome the Action Plan's emphasis on enabling pedestrian movement and hope that facilitating walking and cycling will be a central feature of the Travel Plan. However, the need for new public transport routes and infrastructure must also be addressed, including safe and attractive walking routes to public transport facilities. We believe that the highest priorities are step-free access to Harrow-on-the-Hill station and much-improved links between the centre of Wealdstone and the Kodak site.</p> <p>Community involvement in travel planning is essential and Harrow Friends of the Earth are keen to play a part in this, alongside representatives of pedestrians, cyclists and public transport users.</p>	<p>Green Travel Plan</p> <p>Need to include new public transport routes and infrastructure in the plan</p> <p>Community Involvement in the Plan.</p>	A draft Green Travel Plan has already been produced. TfL is working with the Council to improve the detail contain in this. The specific comments made will be considered in the final drafting of the Green Travel Plan document, which will then be made available for wider comment and input before being adopted.

AAP Policy 21

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
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ID	Section / Para	Summary of Comments	Topic / Change	Council Response
19	AAP Policy 21	Welcome AAP21's recognition of the limitations of the Forward Drive CAA site.	None	Support is noted
38	AAP Policy 21	We support this policy, in particular section G.	None	Support is noted
40	AAP Policy 21	We support the proposal to improve local facilities, and hope that this will lead to more of Harrow's waste being dealt with locally. We are pleased that the policy contains adequate safeguards for local amenity but believe that care must be taken in the choice of technologies used in order to minimise harmful emissions and maximise the potential for recycling.	None	Support is noted. However, as set out in the Pre-Submission West London Waste Plan consultation document, the allocation of waste sites is technology neutral. This enables proposals for new waste facilities to respond to the particular site circumstances without pre-determination. The Council considers that the policies of the West London Waste Plan and the AAP are sufficient to ensure provision of a suitable and acceptable technology option for the Council depot site. No change

AAP Policy 22

No representations received to this draft policy

New Policies Sought

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	New Policy	We support the references to infrastructure within the document but we do recommend that there should be a specific policy or sub text in the Area Action Plan on utility infrastructure, along the following lines: <i>'It is essential that developers demonstrate that adequate capacity exists both on and off site to serve development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to</i>	Insert new policy on utility infrastructure as stated	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p><i>overloading of existing infrastructure, including water and sewerage.</i></p> <p><i>In relation to water and sewerage infrastructure where there is a capacity constraint and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.</i></p> <p><i>Water and waste water infrastructure is essential to any development. Where upgrades to the infrastructure are identified to serve new development it is essential that these are in place ahead of occupation, if sewer flooding to property and no/low water pressures are to be avoided.'</i></p>		

Chapter 6 Sub Area and Site Specific Guidance

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
29	Chapter 6	<p>Schemes and initiatives that promote green infrastructure, green grid and biodiversity opportunities are welcomed and to be supported.</p> <p>In respect of specific site allocations and uses, Natural England will comment on the schemes/sites as they are brought forward.</p>	Green infrastructure	Support for green infrastructure and Harrow's Green Grid is welcomed and noted

Sub Area: Wealdstone West

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Wealdstone West	There are old fashioned industrial sites in this area yet there is no guidance on their future potential.	Industrial Sites guidance	The industrial sites specifically identified in the AAP are those certain to come forward for development over the life of the plan, due to the sites being currently vacant or proposed to be (such as Kodak). With respect to

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
				guidance on the future potential of other industrial sites not specifically identified, this is provided by Policy AAP 15.
				No change
26	6.2.3	The Governing Body is very concerned about an increase in traffic immediately opposite the school entrance and the effects this could have on the safety of children accessing the school premises. Traffic turning in and out of the site could become a hazard to children crossing the road.	Traffic near school	The illustration and text have been amended to clearly show that access through the Colart site to Whitefriars Avenue is for pedestrian and cyclists only, not vehicles.
29	Wealdstone West	Reconnection of town centres and the potential to provide access to the Green Belt is welcomed and to be encouraged and could be assisted in delivery by building on the Green Grid network. New development can provide new links between existing green spaces and new developments to improve access, environmental quality and identity. Green Chains/links can also be used as opportunities to promote walking and cycling initiatives. Improvements to the existing green infrastructure network are welcomed and encouraged.	Green Grid improvements	Support for the Green Grid is noted. This is covered in Policy AAP 11 which includes a Green Grid network map, highlighting the opportunities present in the Heart of Harrow for providing new links. No change
30	Section 6	Wealdstone West and Wealdstone Central are relatively low-lying as viewed from the Harrow Weald Ridge and there may well be the opportunity for some tall buildings on the Kodak site and the centre of Wealdstone that do not impinge on the historic views of the Hill and far enough away from Headstone Manor not to affect it's setting. A tall, mixed use, island site in Wealdstone, of exceptional design, could be a beacon for future investment in the District Centre.	Potential for taller buildings	The Council agrees that the main Kodak site would lend itself to taller buildings, especially the central portion of the site where the current Kodak factory is located, and is itself a big structure in height and bulk. However, in discussions with the developers of the site, Land Securities, they indicated early in our pre-application discussions that they did not want to pursue tall buildings on the site. The reason given was that they want development on the site to integrate with the surrounding dominant suburban character, given the significant residential element of the proposed scheme. The Council therefore supports this view. No change
30	Section 6	A concern with the Kodak/Zoom site residential development is that it appears to be 'creeping' closer to Headstone Manor. Given	Setting of Headstone	The Council has considered this issue in the context of the outline planning application made by the developer

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		its historic and Listed status Headstone Manor must not be compromised by the deterioration of its rural setting by residential encroachment.	Manor	and is satisfied that the open space to be retained on the Zoom Leisure site provides an appropriate buffer and maintains the setting of the Listed Headstone Manor complex. No change
30	Section 6	There is a concern about the loss of playing fields due to the Kodak/Zoom development. Currently local youth football clubs hire out the Zoom pitches but there is no indication where additional pitches are to be located for these clubs once the redevelopment works commence. A new school is also proposed for the Kodak site but there is not a great amount of space, if any, allocated for the recreation of the children.	Loss of playing pitches and reprovion School playing fields for new Kodak primary school	The proposal sees the existing open space reconfigured to provide a new green link running through both sites, linking Headstone Manor to Wealdstone town centre. While this will result in the loss of playing pitches, compensation will be sought to improve the quality and number of playing pitches Headstone Manor recreation ground and at the Bannisters Sports Grounds. The section on site specific infrastructure has been amended to reflect this requirement. The Council understands that the proposal for the new school includes a formalised play area for the children.
40	6.2 Wealdstone West Sub area	We are very concerned about the barrier to sustainable travel in this sub-area caused by the railway line. This is not only a problem for the Kodak site. It also has serious implications for the redevelopment of, for example, the Teacher Centre site. A new foot and cycle bridge between these two sites should be an urgent priority in the travel plan. We strongly believe it needs to be in operation before any new secondary school in the area is allowed to open.	New connection across the railway to Kodak site	The AAP retains the proposal for bridge/underpass providing a new pedestrian and cycle connection across the railway line to connect the Kodak site with the proposal for a new secondary school on the Teachers Centre site. While evidence show that delivery of this enhanced connection is not currently viable as part of the Kodak development, the Council considers the potential for possible delivery should be retained should this prove viable at some time in the future.
40	6.2 Wealdstone West Sub area	We are generally happy with what the Action Plan proposes for the Kodak site, though we are very concerned by two aspects of the current planning application that are at variance with the Council's aspirations. We strongly support the principle that any A1 use of part of the site should have a 'supporting' rather than 'leading' role and be confined to 'small scale retail' only. And we much prefer the Action Plan's location of the primary school to that in the outline application, which we believe would lead to insoluble traffic	Retail to be a supporting use on Kodak Location of new primary	The applicants for the development of the Kodak site have submitted evidence, which has been independently verified, that shows the proposed supermarket will not have a significant impact on local retail shops. However, these reports did conclude that the risk to small shops nearby would be from the application's inclusion of additional small shops, and subsequently the quantum of the floorspace to be provided for small retail units has

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		problems at the beginning and end of the school day as well as a sub-standard environment for education.	school	<p>been halved.</p> <p>The Council's education department has confirmed that the Land Securities proposed location for the new primary school is suitable and preferable in a catchment context.</p>
40	6.2 Wealdstone West Sub area	<p>The Council should not allow any use on this site which would be a major traffic generator. Parking should be minimised and most, if not all, of the housing should be car-free. On-site green space should be maximised. No through traffic (other than buses using transponder-operated gates) should be allowed and no road should be allowed to sever the 'green route' to the east of Harrow View. We oppose the plan to replace traffic lights by a roundabout at the Harrow View / Headstone Drive junction as this can only lead to increased inconvenience and danger for pedestrians and cyclists. New bus routes that can make use of double-deckers are badly needed. We hope that these can run through the site (and possibly even cross the new bridge, though it should be closed to other motorised traffic). We hope that the scope for buses to use the Princes Drive corridor to access the Station avoiding the low bridge will be investigated.</p>	Parking	<p>The objective of the Kodak Opportunity Site is to provide a significant quantum of new industrial and business floorspace consistent with its strategic industrial location designation. Parking and permeability through the site is required to support this new employment floorspace.</p>
			Object to roundabout	<p>Although public transport enhancements are to be delivered, these will not result in public accessibility levels sufficient across the site to support the provision of car-free housing</p> <p>Transport for London has modelled the traffic impact of the proposed development and is working with the Council and the developers to determine suitable mitigation measures to be put in place to manage traffic impacts of the development and possible bus routing to serve the site.</p>
			Potential for new bus routes	<p>The proposal for a new bridge over the railway corridor is for a foot bridge, although an underpass option may prove more accessible for cyclists, mothers with prams etc. Nevertheless, neither option is intended to accommodate vehicles of any kind.</p> <p>No change</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
40	Wealdstone West Sub Area	Whether or not the school is built, cycling facilities in the area will need major improvement, especially between Harrow Weald and the proposed bridge. The school would necessitate a new bus service using Tudor Road, even if initially buses can only travel south from there. If no route suitable for buses can be found through the residential roads to the north then consideration should be given to adapting the proposed bridge to take buses, building a busway alongside the railway or even providing a new Overground station to serve both the school and the Kodak site.	Bus services for the new secondary school, and improved cycle facilities	Enhanced cycling facilities form part of the Green Travel Plan for the Heart of Harrow. TfL have modelled the impacts of a Secondary School on the Teachers Centre site, the mitigation will need to respond to the final school proposal for the site, and being a free school, this remains unknown at this time. Further consultation with the community is proposed to take place prior to an application coming forward for a new school on the site. The Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. Changes have been made to the site allocation text for the site to reflect this.
50	Sub area Wealdstone West	The Council have identified seven sub-areas which make up the Harrow and Wealdstone Intensification Area. Sub-area Wealdstone West includes Harrow View. Land Securities support the key objectives for the sub-area which seek to deliver new homes and jobs, create a green route through the Kodak site, and create new public open space and public realm improvements. The current proposals for Harrow View embrace these objectives and seek to deliver in every aspect.	Sub area objectives	Support is noted

Site 01: Headstone Manor

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
38	6.2.4	<p>We support the objective to promote opportunities for flood attenuation in this area.</p> <p>Design considerations</p> <p>There is an ordinary watercourse which runs along the eastern boundary of this site. This should be included in the design</p>	Flood attenuation	Support is noted and the amendments suggested have been made

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		considerations and opportunities to enhance, de-culvert (if required) the ordinary watercourse should be sought.		
54	6.2.4	<p>Headstone Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage assets. This is achieved through thorough analysis of all the heritage assets, their significance and the contribution the setting makes to their significance. This includes assessing the assets individually and collectively. This approach is line with Planning Policy Statement 5: Planning for the Historic Environment (PPS5) (2010) and English Heritage's <i>The Setting of Heritage Assets</i> guidance (2011).</p> <p>It is noted that the sub-area site specific guidance (i.e. Site 01: Headstone Manor and environs, and Site 02: Kodak and Zoom Leisure) seeks to address these issues. However the details provided in this part of the AAP are not sufficiently robust to conserve the significance of the Headstone Manor complex and its various settings. For example the illustrations, supported by the text, promote development on land east of the Headstone Manor complex. It is noted that a viewing corridor is proposed, but we are still concerned that the significance of the Headstone Manor complex, as provided by its setting, would be harmed by the proximity and form of the development proposed.</p>	Significance of the heritage asset	The Council has concluded, in its response to the current Kodak planning application, that the development on the Zoom Leisure sites represents an encroachment however the retention of a portion of the existing open space will provide a buffer to Headstone Manor, coupled with building heights of two to three storeys in scale, will ensure an acceptable relationship is maintained. Careful scrutiny of building materials and landscaping of the open space are required through reserve matters.

Site 2: Kodak and Zoom Leisure

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
4	Site 2 Kodak and Zoom Leisure	<p>Please will you consider what can be done to ease the traffic congestion in Harrow View and Courtney Avenue while the building is taking place on the Kodak and Zoom leisure sites. As you are already aware, during certain times of the day these roads are extremely busy.</p> <p>Anything that brings decent living accommodation, long term</p>	Traffic congestion	Transport for London has modelled the traffic impact of the proposed development and is working with the Council and the developers to determine suitable mitigation measures to be put in place to manage traffic impacts of the development. This includes traffic impacts to and from the site during the construction and

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		employment, good leisure facilities, youth centres and a general sense of well being for those living or working on this site is to be welcomed.		operation phases. No change
6	Site 2	The Kodak site development has some very good aspects such as the Green pathway and development of ground around Headstone Manor. The issue which has to be addressed will be the large increase in traffic at the Harrow View/Headstone Drive crossroads and the inevitable increase in traffic on Victor, Sydney, Albert, Edward Roads which are already used as rat runs to cut out the lights at the crossroads.	Traffic congestion	Transport for London has modelled the traffic impact of the proposed development and is working with the Council and the developers to determine suitable mitigation measures to be put in place to manage traffic impacts of the development.
6	Site 2	I regret to see from the tree report that the Lombardy Poplars on the north western boundary of Harrow View West and at the far end of Edward Road will be removed. I would hope that the loss of so many trees will be more than made up for by the planting of many more mature trees elsewhere in the development.	Loss of trees	89 of the 241 trees on the site are to be felled, many of which are subject to a 'group' tree preservation order. A detailed landscaping strategy will be prepared by the developer, and the Council will seek to ensure this makes provision for both the loss of existing mature trees alongside significant new provision across the site.
6	Site 2	Kodak Chimney. None of the local people I have met at the various consultations I attended liked the chimney: in fact everyone I have spoken to think it an eyesore. Surely the chimney will be incongruous within the new development and should be removed.	Objection to keeping the chimney	The Council understands that views are split on whether the chimney should be retained or not in the new development. The Council is inclined to agree with the applicant that the chimney is a well known landmark and, although of little heritage value, provides a useful orientation tool within the borough. If the new character to be provided by development on the site is to somehow reflect the site's historic industrial use, then the retention of the chimney may aid this.
6	Site 2	It will be important to ensure that the area designated the Headstone Manor Recreation Ground and owned by Harrow Council will remain as an area of open green space for sport and recreation. There is a danger that this green area could in the future be taken over for more housing. To do this would ruin the well developed plan for recreation in this area which has designated Headstone Manor Recreation Ground as a green area.	Retention of open space	The Harrow Core Strategy includes Policy CS1 F which protects open spaces and ensures there is to be no net loss of land in existing open space. Provision is however made to reconfigure open space where this promotes improvements to quality and access but no reduction in area. This Policy would prevent any loss of the open space on the Headstone Manor Recreation Ground to development. The proposal for opportunity site 2 provides for the reconfiguration of the same quantum of

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
6	Site 2	<p>The plan shows a large retail outlet which is proposed as a supermarket. Although the creation of many new homes in the development will inevitably create a demand for food, it will also be important to ensure that this element in the development does not take business away from the many small businesses nearby. I would be especially concerned for the survival of the excellent small shops near the Quadrant, especially : Headstone News, 217 Harrow View; J Healy Greengrocer, 3 Headstone Drive; J A O'Toole Butcher, 216 Harrow View; Desons Pharmacy, 205 Harrow View; Londis Headstone Drive.</p>	Retail impact	<p>the existing open space on the Zoom Leisure site to be redistributed across the main Kodak site to provide a new green corridor linking Wealdstone with Headstone Manor.</p> <p>The applicants for the development of the Kodak site have submitted evidence, which has been independently verified, that shows the proposed supermarket will not have a significant impact on local retail shops. However, these reports did conclude that the risk to small shops nearby would be from the application's inclusion of additional small shops, and subsequently the quantum of the floorspace to be provided for small retail units has been halved.</p>
10	Site 2	<p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."</p>	Utilities capacity	<p>The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP.</p> <p>No change</p>
12	Site 2	<p>I like the plans for the Kodak site – Land Securities seem to have listened to what people want to see – good mix of housing, small businesses, green space.</p> <p>Not sure about a "free school" – if the government changes, will</p>	Concern over the long term future of Free Schools	<p>Support for the Land Securities proposal is noted. Given the stage the application has reached, and the comprehensive nature of the evidence produced in support of the planning application, the AAP has been changed to more closely reflect the Land Securities</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		this be out of fashion and then we are left with a shortage of secondary school places.		proposal in terms of uses, quantum and layout. The AAP makes provision for a new secondary school, serving the Heart of Harrow, on the Teacher's Centre site in Wealdstone.
13	Fig 6.8 Kodak Site	I do prefer the proposed school to be west of Harrow View as shown here, rather than within the main Kodak site as proposed by Land Securities. Does the "education" rectangle in fig 6.8 allow for space for playground and playing field? If not, remove the touching residential block to the west and allot the space to the school	Kodak primary school	No change The Council's education department has confirmed that the Land Securities proposed location for the new primary school is suitable and preferable in a catchment context. The Council understands that the proposal for the new school includes a formalised play area for the children.
13	Kodak Site	ref design considerations – second one on page 96 We do need a new means of crossing the railway, as indicated by the dotted "key route" lines in figs. 6.8 and 6.13, to link the Kodak site and the Teachers Centre area (Heart of Wealdstone). However a conventional footbridge like existing ones is not the answer - they are very unfriendly and off putting, being steep and awkward, and no use at all to major user groups such as people with prams, shopping trolleys, mobility scooters and cycles. I suggest re-write this one as follows: "- consider and allow for provision of future pedestrian and cycle way across the railway corridor, considering both bridge and underpass options". An underpass may well be more costly, but probably far more beneficial. Think of mums and grannies.	New connection across the railway	No change Agreed. The text has been amended to include the option of both a pedestrian bridge or underpass
19	Kodak Site	Paras 2.5.12 & 3.6.2 - agree that development on the Kodak site will have a serious effect on traffic. It was a very short-sighted decision to allow development of the Goodwill to All site to take place separately from the larger site behind it piece-meal development which will also prevent the action para 3.6.2 describes of improving the capacity of the road junction, and delay	Traffic congestion	Transport for London has modelled the traffic impact of the proposed development and is working with the Council and the developers to determine suitable mitigation measures to be put in place to manage traffic impacts of the development.

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24	Site 2: Kodak	<p>the improved bus service which 2.5.12 describes.</p> <p>The key site objectives for this strategic site are strongly supported, as is the Council's intention to promote a comprehensive employment-led regeneration of the site that would also deliver wider aspirations for the intensification area.</p> <p>Whilst it is acknowledged that eventual consolidation would be driven by robust economic evidence, the GLA is satisfied that figure 6.8 represents a pragmatic, evidence based, approach to comprehensive redevelopment of this site, and one which would support the key objectives of the intensification area.</p> <p>Nevertheless, officers would welcome further engagement with the Council, before the next stage of consultation, to determine the likely scale of SIL consolidation in land area terms, and to consider whether the remodelled parcel of employment land would merit the retention of strategic identification within the London Plan.</p>	Site objectives	<p>No change</p> <p>Support noted. Further engagement welcomed.</p>
24	Consolidation of SIL	<p>Area Action Plan Policy AAP14, supported by site specific guidance for opportunity site 2, represents the preferred approach to consolidation at the Wealdstone SIL. This has been developed with strategic guidance to respond to the local and sub-regional employment context, and follows the Council's statement of intent within the emerging Harrow Core Strategy, that consideration will be given to the consolidation of the Wealdstone preferred industrial location where this would contribute to the promotion and development of Wealdstone in line with the objectives for the intensification area. Within his representations on the Harrow Core Strategy, the Mayor stated that the GLA will work closely with the Council, and other strategic partners, to develop a suitable approach for the regeneration of the Wealdstone SIL, specifically considering its boundary and function, as part of the Harrow and Wealdstone Area Action Plan.</p> <p>With respect to the transfer of employment land to alternative uses, the strategic context presented by the report London's Industrial Land Baseline (2010), commissioned by the GLA, indicates that the quantum of industrial land released within the</p>	Consolidation of SIL	<p>The Council notes that, in the context of the Wealdstone SIL, the GLA are satisfied that the approach taken to consolidation is sound.</p>

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		<p>west London sub-region since 2006 has already exceeded its 52 hectare benchmark up to 2026. It should be noted, however, that this benchmark is currently under review in the light of newly emerging strategic evidence. The Mayor is shortly expected to publish supplementary planning guidance to respond to this.</p> <p>Notwithstanding the performance of the sub-region against its benchmark for managed release of employment land, the GLA is content that within the context of the sub-region, taking into account the characteristically superior, and commercially preferential, industrial locations in</p> <p>neighbouring boroughs (including at Heathrow, Park Royal and Wembley), the rationale for consolidation of employment land at this site, as part of a strategically coordinated process, is sound.</p>		
24	Site 2: Kodak	<p>Opportunity site 2 in Chapter 6 of the Area Action Plan presents a preferred layout and combination of land uses to promote managed consolidation at the Kodak site that would deliver 1,230 jobs, enabled by supporting land uses including 1,035 new homes. The GLA is satisfied that figure 6.8 represents a pragmatic, evidence based, approach to comprehensive redevelopment of this site, and one which would support wider objectives of the intensification area, including the key requirement to improve access to open space.</p> <p>It is noted, however, that whilst the preferred layout option for opportunity site 2 implies an indicative level of SIL consolidation by nature of its proposed land use layout, quantitative figures in land area terms have not been cited. The GLA recognises that this reflects the Council's favoured approach of a bespoke evidence based response to SIL consolidation, as promoted by Area Action Plan Policy AAP14. Nevertheless, officers would welcome further engagement with the Council on this matter to determine the likely scale of SIL consolidation in land area terms, and to consider whether the remodelled parcel of employment land would merit the retention of strategic identification within the London Plan.</p>	Land uses	<p>Support for the combination of land uses is noted. The Council welcomes further engagement with the GLA in defining the new extent of the consolidated SIL and, in the long-term, discussions on the retention of the strategic designation applying to this site.</p>
			SIL consolidation	

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
38	6.2.5	It is good that reducing flood risk is in here.	Flood risk	Support is noted
47	Site: Kodak	Opportunity Site – Kodak and Zoom Leisure - Site 02 – there are very significant differences in content and layout between the preferred option and that contained in the current Land Securities Outline Planning application. I consider the Land Securities proposal much more attractive in every respect.	Site layout	Support for the Land Securities layout in their masterplan is noted. Given the stage the planning application has reached, and the detailed evidence submitted in support, the AAP site allocation has been amended to reflect the Land Securities proposal.
50	Site 02: Kodak	<p>Paragraph 6.2.5 of the AAP identifies Harrow View and specifically outlines the key objectives for the site, which reflect the overall objectives for the wider sub-area. In terms of land use, the AAP seeks employment-led regeneration providing modern employment space for a range of B1, B2 and B8 uses. This will be enabled by new, high quality residential development and supported by retail uses, financial and professional services, cafes & restaurants, a 3-form entry primary school, community and leisure facilities.</p> <p>The key objectives for the site are set out on page 92 of the draft AAP which are to enable <i>'employment-led regeneration providing diverse and modern employment space aimed at supporting and growing Harrow's SME, move-on and traditional industrial sectors'</i>. The consultation document recognises that enabling residential development to create high quality mixed use and family housing is required to achieve these objectives. Page 94 of the consultation document states a 'minimum output' figure of 1,230 jobs and 1035 homes for the site.</p> <p>As the Council are aware, Land Securities have an extant outline planning application which has been submitted pursuant to the parameters set out in the draft AAP. These proposals deliver, as confirmed by the Council, the scale of jobs and residential provision of all types as set out in the draft AAP document. Having regard to the London Plan and the Core Strategy the draft AAP suggests that the Council's primary objective is securing a minimum of 1,230 jobs and that the 1,035 homes are the catalyst for achieving this. Accordingly, we consider that the number of new homes should not be stated as a minimum but rather as a</p>	<p>Site objectives</p> <p>Housing figure to be a target</p> <p>Use classes C2 and C3 to count towards housing output</p>	<p>Agreed. The site allocations within the AAP have been amended to refer to housing figures as a target rather than a minimum.</p> <p>Non-conventional residential development can count towards Harrow's strategic housing target. Currently the Council chooses not to include this, primarily because historically numbers were low, ad hoc and therefore absent from the trajectory. However, if demand continues to increase and supply quantified, then we may wish to capture this in the housing pipeline. Nevertheless, while there is no barrier to the Council counting C2 towards the homes outputs for the site, the fact that we currently do not count this in annual completions, could then potentially result in an under performance against the borough and AAP strategic housing targets. Our preference therefore is to reduce the housing target for the site to 985 in line with the planning application figure.</p>

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		'target' and suggest that this should be reworded to state <i>"development should seek to achieve 1,035 new homes."</i> Furthermore, it should be clarified that Use Classes C2 and C3 will count towards the homes output number.		
50	Site 02; Kodak	Section 6 of the draft AAP states that Site 02 could include small scale retail (A1 use), financial and professional services (A2 use) and restaurants and cafes (A3 use) as supporting land uses to the lead land use of employment on the site. We consider that it would be acceptable to widen this further and include public houses (A4 use) and hot food takeaways (A5 use) this reflects the range of uses which local residents and employees will expect to find within a short distance of their home or workplace not just within the town centre.	Widen the scope of uses to include A4 and A5	Agreed. The description of supporting land uses has been amended to provide for Use Classes A4 & A5
50	Site 02; Kodak	In terms of the delivery of Site 02 the draft AAP states that <i>"phasing of development to be linked to staged re-appraisal to secure the maximum employment floorspace."</i> As outlined earlier in section 5 of our representations in respect of paragraph 5.6.8, Land Securities do not believe that it is an appropriate requirement to review or revisit the amount of floorspace beyond that set within the approved parameters of an extant planning permission. Again we request that this is removed from the AAP.	Phasing	Agreed. This has been removed.
54	Site 02	On considering the Kodak site, we would also encourage the sub area site specific guidance to consider the industrial heritage of the site and encourage the retention and enhancement of positive elements as part the site's regeneration. This approach would accord with London Plan policy 7.9.	Reflecting industrial heritage	Agreed. The design considerations have been amended to give consideration to how the establishment of a new urban form and character for the site might reflect or incorporate elements of its industrial past.

Site 03: Teachers Centre

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
3	Site 03 Teachers'	Teachers Centre - I oppose this site being used a school this will result in loss of amenity of my constituents by creating extra traffic	Traffic congestion /	The site has a long history of education use, and therefore remains the Council's preferred option for a

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	Centre	congestion. The area is already severely affected by anti-social behaviour from the existing High Schools in the area. The area already lies within a CPZ any therefore any development of a school will add to the already recognised problems in the area.	Parking	new secondary school. Further changes have been made to extend the boundary of site to take in the builder's yard on Cecil Road, the Whitefriars Industrial Estate and Aerospace House. The designation will provide for continued industrial use of these sites as well as for further education use, enabling the consideration of a much larger parcel of land to provide further options to accommodate a new school more comfortably on the site. It will also enable wider options to be considered to mitigate the traffic impacts arising from any school proposal. While TfL have modelled these impacts, the mitigation will need to respond to the final school proposal for the site, and being a free school, this remains unknown at this time. Further consultation with the community will therefore need to take place prior to application coming forward for a new school on the site. The Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. Amendments are made to the AAP to reflect these requirements.
10	Site 3: Teachers Training Centre	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		whether the proposed development will lead to overloading of existing waste water infrastructure.”		
13	Teachers Centre 6.2.6	ref design considerations [page 99] – penultimate one Provide pedestrian <u>and cycle</u> link across site... The same points apply to a railway crossing as above [see 8]. Re-write this last design consideration: ”New development should provide for an accessible and inviting relationship with a pedestrian and cycle underpass or bridge across the railway...”	Cycle link	Amended to include cycle link as well. While evidence show that delivery of this enhanced connection is not currently viable as part of the Kodak development, the Council considers the potential for possible delivery should be retained should this prove viable at some time in the future.
26	Site: Kodak and Teachers Centre	<i>‘New 3 form entry Primary school on Kodak Site’ ‘Delivery of site suitable for Free school on Teachers’ Centre site’</i> The authors of this consultation document have not considered the implications these two statements could have for the future of Whitefriars Community School. The bald suggestion of a ‘new school’, with no accompanying explanation, coupled with the statement which follows it, creates the immediate impression that Whitefriars Community School would no longer be occupying its current site. Such implications create anxiety in a school community. The Governing Body seeks public assurances that there is no intention of closing the school.	Whitefriars School Status	The AAP text for this site allocation has been amended to clarify that the Whitefriars Community School is to be remain on the site and be integrated with the proposal for a new secondary school.
26	Site 03: Teachers Centre	Figure 6.13 makes it clear to the Governing Body that the authors of the consultation document have no first hand knowledge of the site. It is incredible to suggest not one but two ‘key routes through the site’ which traverse the school playground, passing between school buildings and across a playground without any thought to child protection and security issues. Neither of these key routes could be created as illustrated. Currently there is an access ‘dogleg’ path from Whitefriars Avenue to the Teachers’ Centre car park which runs between the houses in Whitefriars Avenue and alongside the school playground. This could be used as it is	Pedestrian and cycle routes	The site allocation illustration has been amended to remove the key route running through the middle of the site. The key route running along the southern boundary remains but will be subject to further investigation as part of the development for the secondary school.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		securely fenced off from the playground.		
		The other proposed 'key route', running along the edge of the school field would be impossible to create without access through the school's overcrowded staff car park. It would have to be fenced off from the school field where an existing tree line would be difficult to avoid.		
26	Site: Teachers Centre / Whitefriars	The illustrated location of 'Education' on Figure 6.13 occupies a large area of Whitefriars Community School's field. This is not part of the Teachers' Centre, nor accessible to Teachers' Centre users without the permission of Whitefriars' Headteacher. The field is regularly used for a range of outdoor activities by pupils as part of the curriculum. The school is considering the creation of a wild life area there (next to Tudor Road). If it is intended to put new build on that part of the site, the Governing Body would wish to be informed so that valuable school finances are not wasted on a development which would have little prospect for future use by the school.	Open Space status	<p>The AAP text for this site allocation has been amended to clarify that there is to be no loss in playing fields and that the open space to the north of the current Teachers Centre car park is to be incorporated into the site to provide a much larger and more functional area.</p> <p>The inclusion of the Industrial land fronting Tudor Road offers an alternative access to the site and therefore alternatives for the layout and location of the secondary school on the site. Further consultation with the community and the School will take place prior to application coming forward for a new school on the site, enabling the consideration of the best location of the proposed secondary school buildings.</p>
26	Site: Teachers Centre / Whitefriars	<p><i>Site constraints / dependencies & Design considerations: 'Shared use of sports hall with Whitefriars primary school'</i></p> <p><i>'Need to accommodate a shared use sports hall in event that Primary School is not relocated/incorporated into site'</i></p> <p>The use of the sports hall is shared with the Teachers' Centre, but no mention is made of the school assembly hall which also has shared use with the Teachers' Centre. The Governing Body has a responsibility to ensure that the school provides a full and balanced curriculum for its pupils. Without provision of alternative accommodation Whitefriars Community School would not be able to do this.</p> <p>'...in event that Primary School is not relocated/incorporated into site' carries the strong implication that Whitefriars Community</p>	Loss of facilities	<p>The AAP text for this site allocation has been amended to clarify that the proposals for the secondary school on the site must provide for the reprovision of the current shared hall and gym, if these are not to be retained, having regard to the need for shared use of such facilities between the schools.</p> <p>The reference to any potential relocation of the Whitefriars Community School, either within or off-site, has been removed.</p>
			Loss of Whitefriars School	

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		School could, as a result of these plans, no longer exist. The Governing Body would, again, seek immediate assurances that there is no intention of ceasing the provision of primary education at Whitefriars.		
26	Site: Whitefriars School	<p>Site Specific infrastructure: ‘Potential need to relocate primary school depending on site response’</p> <p>Without any indication of the intention behind this statement there is, once again, an implication that Whitefriars may cease to exist in its current position. This again creates uncertainty for the stakeholders at the school and in the local community. The Governing Body seeks clarification of this statement.</p>	Loss of Whitefriars School	The reference to any potential relocation of the Whitefriars Community School, either within or off-site, has been removed.
26	Site: Teachers Centre	<p>Delivery: ‘Council to work with community and education partners to support and bring forward a Free School application proposal on this site’</p> <p>It would appear that the authors of this consultation have little understanding of how a Free School is set up and its governance. Free Schools are not within the Local Authority’s (LA) jurisdiction. These proposals suggest the introduction of a Free School that could be combined with the existing LA maintained Whitefriars School using shared facilities. The Governing Body do not think the shared facilities as they exist now would be sufficient for both schools.</p> <p>The Governing Body of Whitefriars Community School submits this response to the Heart of Harrow consultation document with a request that the serious implications for the future of Whitefriars Community School be addressed in an immediate response that can reassure governors and other stakeholders. We expect any further development of plans for the site are referred to the Governing Body for comment and response before they are made public.</p>	Free School Status and the implications for shared facilities	The Council is the landowner of the Teachers Centre site and therefore will be involved in any negotiations over the provision of a Free School application on this site, including the need for and use of shared facilities
40	6.2.6	We are very worried about the proposal for a large secondary school on the Teachers Centre site. It is some way from public transport and the nearest point on a main road is one that already	Suitability of site for a school /	See response to ID3 above

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		suffers from traffic congestion and bus overcrowding problems due to its proximity to Whitefriars Primary School, Salvatorian College and Sacred Heart Language College. We question whether this is a suitable site for a new school at all, especially because it seems Whitefriars may have to be closed to accommodate it.	transport congestion	
Anon 1	Site 03: Teachers' Centre	Oppose the new school on the Teachers' Centre. Loss of local amenity and too much traffic.	Amenity and traffic	See response to ID3 above

Site 04: Col Art

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
3	Site 04 ColArt	ColArt Site - I oppose using this site for housing as the area is suffering from higher than average unemployment and the employment use must be retained. This will again lead to loss amenity to my residents from extra traffic and air quality.	Retain in employment use.	The Employment Land Review highlights the lack of demand for industrial uses in the borough, especially large industrial units. The key consideration for this site is in securing new jobs equivalent in number to that achieved when Colart were in operation. Enabling residential development will be required to deliver new employment space and community use, and therefore the allocation of the site for employment-led mixed use development has not changed.
10	Site 4: Col Art	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
21	Site: Col Art	<p>existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."</p> <p>The Design Considerations in the preferred option refer to the following:</p> <p>"Cluster community uses and key public spaces in and around the Winsor and Newton building, including those adjacent to the site ownership boundary."</p> <p>I would urge the council to bear in mind the submission that has been made to the DfE in relation to the Government's Priority School Building Programme [PSBP] and how a successful outcome to that process might influence decisions on the future use and development of the Winsor and Newton Site. The DfE has yet to make a decision with regard to the PSBP; however all major players with an interest in the successful development and economic regeneration of Wealdstone should enhance the educational provision for the entire community in the locality not just in terms of 11 - 18 education but in terms of enabling the broadest access by the community [especially those who are from ethnic minorities and those who are suffering economic disadvantage] to innovative programmes which will equip them with the skills and education necessary to develop enterprise and innovation locally: and to use Salvatorian College as an established educational hub.</p> <p>Although it is important to provide new homes in the area it is also necessary to provide the infrastructure which will support economic regeneration within the locality and across the borough generally. Innovative programmes based at Salvatorian could be linked to borough wide business initiatives in partnership. Developing a more solid and broader commercial base in the borough involving such things as innovative IT applications which could help to make a significant transformation to prosperity within the borough. More economically active residents within</p>	<p>Regard should be had to the PSBP school building programme submission</p>	<p>Agreed. The AAP has been amended to accommodate the potential expansion of the Salvatorian School but subject to the College providing the robust evidence of need and their ability to purchase the land (i.e. in the circumstances where PSBP funding is not made available).</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>the borough would mean less demand for council social services and more in the way of tax receipts to fund key projects for the betterment of the whole community.</p> <p>I would urge the council to look carefully at incorporating the development of facilities at Salvatorian College within the overall scheme.</p>	<p>Make provision for expansion of Salvatorian College</p>	
23	Site 04: Col Art	<p>I write as the parish priest of St Joseph's Catholic Church Wealdstone and as the Chair of Trustees of the Salvatorian College.</p> <p>The existing Salvatorian College buildings are in a very poor state and the extremely small footprint of the site is inadequate for the present pupil numbers. Expansion within the existing grounds of the College is therefore practically impossible.</p> <p>All the Catholic primary schools in Harrow are heavily oversubscribed and there is a clear need for a new Catholic primary school.</p> <p>I believe the availability of the Col-Art site represents a once in a lifetime opportunity to improve the provision of the College and gives us an opportunity to build a much needed primary school for the Catholic sector.</p> <p>I would be obliged if in drawing up the plan sufficient space is included for the expansion of the Salvatorian College site.</p>	<p>Make provision for expansion of Salvatorian College</p>	<p>Agreed. The AAP has been amended to accommodate the potential expansion of the Salvatorian School but subject to the College providing the robust evidence of need and their ability to purchase the land (i.e. in the circumstances where PSBP funding is not made available).</p>
42	Site: Col Art	<p>There appears to be some confusion regarding whether the Colart site has access from Wealdstone High Road or High Street. The maps we have, including your Planning Services map, indicate that south of Long Elmes it is High Street.</p>	<p>Clarification</p>	<p>The change between High Street and High Road occurs at Spencer Road, so the site is High Street. This is confirmed by the postal addresses of both Orion House, to the south of the ColArt site entrance, and the petrol station to the north, being 187 and 190 High Street respectively. While the Catholic Church neighbouring the petrol station but just north of Spencer Road is given as 196 High Road.</p>
43	Fig 6.15 Col	<p>The potential site arrangement shown here identifies a pedestrian link to the High Street (just south of Orion House). Whilst this area</p>	<p>Pedestrian</p>	<p>Agreed. The illustration has been amended to reflect this</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	Art	is within the curtilage of the site, it is designated as a right of way for Orion House and is therefore considered inappropriate to provide a pedestrian link at this point. However creating links to the site via the High Street to north and Bruce Road and Ladysmith Road to the south are realistic.	links	
43	Site: ColArt	Note 3 Design Considerations The land values will not support all of exemplar low/zero carbon (code5/6) housing, the affordable housing requirements and the employment provision requirements.	Viability concern	Agreed. This will be subject to overall scheme viability. The text has been amended to remove this reference
43	Site: Col Art	Note 10 Delivery The business and studio floorspace would be funded by the residential development therefore it is unrealistic to secure these uses before the completion and occupation of the residential development.	Delivery	Agreed. The text has been amended to state that the delivery of the employment and/or community floorspace is to be tied to phasing of the enabling housing
Anon 1	Site 04: ColArt	Oppose housing on ColArt site. This should be for jobs only.	Retain in employment use	The Employment Land Review highlights the lack of demand for industrial uses in the borough, especially large industrial units. The key consideration for this site is in securing new jobs equivalent in number to that achieved when Colart were in operation. Enabling residential development will be required to deliver new employment space and community use, and therefore the allocation of the site for employment-led mixed use development has not changed.

Sub Area: Wealdstone Central

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
12	Wealdstone Central Sub Area	Colart site – can the Windsor & Newton Museum be a focal point? Like the idea of low carbon housing.	Focal point	The Winsor and Newton building is to make provision for new employment uses on the site The achievement of the low carbon housing will be

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Not sure about the multi-storey being demolished for a supermarket especially if it's Tesco – (how about the Co-op) – I think it would take business away from the High Street. The High Street could have some better class shops eg women's clothing, a shoe shop, butchers, craft and flower shop. The derelict pubs do need re-developing – low carbon homes? Or green space + play area.</p>	<p>Concern over proposed supermarket</p>	<p>subject to viability considerations</p> <p>The proposed allocation of the Wealdstone multi-storey car park has been removed due to the emergence of evidence that suggests this is not viable and over concerns of the loss of the parking facility on businesses in the town centre</p> <p>While the AAP can make provision for new retail units it has not control over the quality of the retail occupier</p> <p>The derelict pubs are included in the AAP for redevelopment in Opportunity Site 6 Wealdstone infills.</p>
14	Wealdstone Central Sub Area	<p>POL's Wealdstone CO/OFF falls within the boundary of the Wealdstone Central Sub-area. We note that whilst the site has not been identified for development. It does fall within an area identified for 'new high street public realm'. However, the document does not specify the proposed works as part of the improvements to the public realm.</p> <p>We request that POL is advised of the proposed public realm works, as proposals emerge and are developed, so that they can manage any potential impact these may have on their operations at their Wealdstone CO/OFF site. This will ensure that POL's operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000.</p>	Public realm	<p>The Council or its contractors will notify all parties affected by public realm improvements prior to such works being undertaken, and will seek to ensure appropriate measures are taken minimise any disruption.</p> <p>No Change</p>
29	Wealdstone Central	<p>Improvements to existing public realm through the use of and implementation of Green Infrastructure and soft landscaping are to be encouraged and supported.</p>	Public realm	Support noted.
40	6.3 Wealdstone Central Sub Area	<p>If there is to be a new supermarket in Wealdstone, then we believe it must be centrally located. A location away from the centre, especially one on the other side of the railway, would further threaten the viability of the central shopping area and undermine attempts to establish a more sustainable pattern of travel. The car-park site identified seems to be suitable, provided there is a focus on pedestrian access as part of a safe, attractive</p>	Supermarket should be located in-centre	<p>Base on the comments received, and the evidence submitted in respect of the Kodak application for a supermarket, which has been independently verified, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP. However this would not restrict proposals from coming forwards</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		2 storeys. As such, it is requested that the corners of this junction in the Centre of Site 07 are annotated as potentially 5-10 storeys in height.	Building heights	
49	Wealdstone Central Sub area	<p>The statement in respect of flood risk in Central Wealdstone as set out early in the AAP at Paragraph 3.6.3 is supported, which states:</p> <p>“Co-ordinate flood management works and sustainable drainage, to ensure development and regeneration opportunities can be realised”.</p> <p>Our client is strongly encouraged that there appears to be an acceptance by the Local Authority that flood risk should not necessarily be seen as a barrier to development and that the co-ordination of flood related investigations between the Authority and developer(s) can be invaluable in ensuring that development comes forward.</p>	Flood risk	Support is noted.

Site 05: Wealdstone multi-storey car park

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
6	Site 05 Wealdstone Multi-Storey Car Park	It will be vital to have a new large supermarket with parking provided in Wealdstone Central. This will bring people into the area to shop in other shops nearby who are in need of custom. The area has declined since the Safeway supermarket closed many years ago.	Supermarket provision	Base on the comments received, and the evidence submitted in respect of the Kodak application for a supermarket, which has been independently verified, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP. However this would not restrict proposals from coming forwards but would require it to be considered on its merits against the policies of the AAP and the delivery of the sub area objectives.
10	Site 5: Wealdstone Multi-Storey	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in	Utilities capacity	Noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
16	Car Park Site 5:	<p>relation to this site.</p> <p>It is a bad idea to demolish the multi-storey car park and it would be completely unacceptable unless a similar number of spaces, without massive increases in charges, is to be provided in the new "public car park". Supermarkets normally only provide 2 hours' parking even for customers, so the council would have to ensure that this new supermarket is contractually bound, for a lengthy period, to make their facility available to the general public for much more than 2 hours (although not for long enough to allow commuter parking). The present facility is the only reliable, safe and reasonably-priced place to park in the area and should be left alone. If this is impossible, an equivalent facility must be provided nearby during the construction period. Otherwise, the effect would be devastating for local businesses, charities etc., as well as causing massive inconvenience to motorists.</p>	Parking facilities	<p>Base on the comments received, and the evidence submitted in respect of the Kodak application for a supermarket, which has been independently verified, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP. However this would not restrict proposals from coming forwards but would require it to be considered on its merits against the policies of the AAP and the delivery of the sub area objectives.</p>
50	Site 05: Wealdstone multi storey car park	<p>Turning away from Harrow View, we are aware of the proposals set out for Site 05 the Wealdstone multi-storey car park which is within the Wealdstone Central sub-area. Given the context of the site specific proposals for this site and the context of their outline planning application, Land Securities would question the deliverability and suitability of the site for retail purposes. As part of the outline planning application we have undertaken a detailed analysis to meet the requirements of PPS4 and this assessment is equally applicable for the consideration of the proposed site allocation.</p> <p>Land Securities has undertaken further analysis of the suitability of the site for a foodstore and associated replacement public car parking facilities but we are aware that the designation is subject to review. If it is intended to pursue the current designation, Land Securities would wish to object on the grounds that the site is not viable, suitable or available and at which time we will make technical analysis available.</p>	Supermarket viability.	<p>Base on the comments received, and the evidence submitted in respect of the Kodak application for a supermarket, which has been independently verified, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP. However this would not restrict proposals from coming forwards but would require it to be considered on its merits against the policies of the AAP and the delivery of the sub area objectives.</p>

Site 06: Wealdstone Infills

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
6	Site 06 & 07	It is certainly the case that the area around the railway bridge and around the station needs to be improved with better planting.	Urban realm	Support is noted
10	Site 6: Wealdstone Infills	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change

Site 07: Palmerston Road/George Gange Way

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 7: Palmerston Road / George Gange Way	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”		
28	6.3.6 George Gange Way	Pedestrians and cyclists to be allowed to cross to Canning Road (zebra / cycle crossing). The roundabout (site 07) should be converted to a smaller European-style roundabout with a larger pedestrian and cycle route around it, with humped zebra crossing and cycle crossings across each arm of the roundabout. Alternatively it can be converted to a signalled junction. Segregated cycle paths or cycle lanes (minimum 1.5m wide) should be provided along George Gange Way as far as the High Road (which is probably too narrow for cycle lanes). The uphill ramp can be a shared pedestrian / cycle path to save space (as bicycles will be slow on this section, and it is infrequently used by pedestrians).	Cycle facilities	Proposed improvements being considered include the removal of the roundabout. Further more detailed design work is required to determine the appropriate layout and to incorporate better east – west connections for pedestrians and cyclists.
38	6.3.6	In the site constraints it should be mentioned that there is a culverted watercourse which runs along George Gange Way and development should be set back from the outer walls of the culvert by a minimum of 8 metres (or 5 metres as it is ordinary watercourse) to ensure the structural integrity of the culvert and future repair/upgrade works can be achieved into the future. This is particularly important with the increased demand on watercourses and culverts as heavier rainfall and more frequent storm events are predicted as a result of climate change.	culverted watercourse –buffer area requirement	Amendments as suggested have been made to the AAP
49	Site: 37-41 Palmerston Road	Our client is encouraged that further to these representations and separate discussions with the Authority, their site is as a result included within the current Preferred Option as allocated for future redevelopment. As such, they welcome the publication of this latest iteration of the Area Action Plan (AAP) as the mechanism to deliver the much needed significant and appropriate development in the Harrow and Wealdstone area. Accordingly, it will be established that this letter of representation strongly supports the	Site allocation	Support for the site’s inclusion as an allocation in the AAP is noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
49	Site: 37-41 Palmerston Road	<p data-bbox="450 240 1227 360">inclusion of 37-41 Palmerston Road as a 'key site' within the Wealdstone Central Sub-Area, as well as comments on behalf of our client in respect of relevant strategic policies proposed within the AAP document.</p> <p data-bbox="450 392 1227 512">MP&G Trading welcome this focus on Harrow and Wealdstone and the opportunity to promote their site further through the emerging Intensification Area AAP, in the clear supportive context of the focus on this area within the Core Strategy.</p> <p data-bbox="450 544 1227 663">Detailed discussions have been held with senior Planning Officers at Harrow Council to discuss the potential development of the site, and the principle of this has been formally agreed. A Location Plan is enclosed detailing the positioning and extent of the site.</p> <p data-bbox="450 695 1227 815">The owner has assembled a complete consultant team who have been instructed to prepare and submit a detailed Planning Application for the site, confirming that they are committed to delivering this sustainable and highly accessible site.</p> <p data-bbox="450 847 1227 1031">It is considered that the site at 37-41 Palmerston Road responds positively to, and fits within the strategic and local objectives of the Intensification Area, supporting the site's identification as an Key Site in the AAP. It is considered that the site would meet all (AAP and Core Strategy) emerging policy objectives for the following reasons:</p> <ul data-bbox="450 1062 1227 1394" style="list-style-type: none"> <li data-bbox="450 1062 1227 1118">• Is within the indicative boundary of the Intensification Area; <li data-bbox="450 1142 1227 1174">• Opportunity Site: under-utilised (sub)urban land; <li data-bbox="450 1198 1227 1254">• Land and buildings are within sole ownership, and is available and deliverable; <li data-bbox="450 1278 1227 1342">• Suitable location for residential development and other commercial / employment uses to deliver a mixed-use scheme; <li data-bbox="450 1366 1227 1394">• Potential for a 'landmark' building on this prominent line 	Site allocation	The Council welcomes further discussion about the contribution that development of the site at 37-41 Palmerston Road can make towards both AAP and sub-area objectives, in terms of jobs outputs and the amount of residential development to enable this, as well as the optimum design and form of development to satisfy the design considerations set out in the AAP.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>between Harrow and Wealdstone;</p> <ul style="list-style-type: none"> • Development potential for up to 90 units of various sizes; • Residential use is an appropriate, complementary and sustainable form of high density development in this established suburban area, in a highly accessible location. 		
49	Site: 37-41 Palmerston Road	<p>It is acknowledged that the site is within an area of possible flood risk. It is understood that the Local Authority are undertaking some work in this regard given the importance of development sites identified within such flood risk areas. The site owner has retained the services of their own flood consultant to advise in this regard, and expects and is prepared to submit a full FRA with any future application. However, they would like it known at this stage that any 'joined-up' working would be greatly appreciated to work with Harrow in order to clarify the position and undertake any modeling exercises that may be required, given the extent of material that was presumably commissioned when undertaking the Strategic Flood Risk Assessment.</p>	Flood modelling.	The additional detailed work to supplement the Level 1 & 2 SFRA studies is now complete and will be published alongside publication of the AAP. It should be noted that the policies, in respect of the flood mitigation requirements for development within the central Wealdstone sub-area, have been amended in line with the recommendations of the further SFRA work.

Sub Area: Wealdstone East

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
12	Wealdstone East	We need a revamped Leisure Centre to provide plenty of sports activities for young and old. Like the idea of Byron Park being linked to Leisure Centre and providing football pitches, could also have cricket pitch and nets, hockey field and netball courts.	Need revamped Leisure Centre	Support for improvement/refurbishment of the Leisure Centre is noted as are comments in respect of potential outdoor sports uses of Byron Park. The latter is subject to the finalisation of the Council's Playing Pitches Strategy and the Open Spaces Strategy
16	Wealdstone East	The Leisure Centre is an essential facility for residents. If it has to be refurbished, well and good, but replacement would take it out of commission for too long. If the latter cannot be avoided, at least leave the Herga Bowls Club untouched. This is the only indoor club for many miles around and is a central part of life for hundreds of senior citizens throughout the borough during the	Retention of bowls club. Support for redevelopment of Leisure	Support for improvement/refurbishment of the Leisure Centre is noted as are concerns regarding replacement. Further work is still being undertaken by the Council to determine the most appropriate options available to improve the existing leisure offer and complex. This is likely to be the subject of a separate consultation

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		winter months when there are few other places for them to go. As the skate park is to be retained for the younger generation, who have many other facilities provided for them, it would amount to blatant age discrimination not also to retain the bowls club.	Centre	exercise with the community outside of the AAP process.
38	6.4.3	You have stated under infrastructure “flood mitigation in accordance with FRA”, did you mean SFRA?	Clarification	Yes it should state SFRA and has been amended
40	6.4 Wealdstone East sub area	While we support the provision of improved recreational facilities, we believe that their health benefits can be nullified if the car is seen as the default mode of access to them. To make a multi-storey car-park a major focus of redevelopment of the Leisure Centre sends all the wrong signals. In our opinion, parking close to the building should be restricted to cycles, provision for disabled people and essential servicing needs. The facility should be designed so that walking and cycling are seen as the major modes of access.	Car parking re-provision	The Leisure Centre complex is a strategic facility that serves the whole Borough. While the Council would hope that improvements in walking and cycling connections within the Heart of Harrow and to this site would encourage residents within the Heart of Harrow and wider Wealdstone area not to drive to use this facility, it is unrealistic to expect the same of residents living in South Harrow, Pinner or Edgware. Therefore, replacement car parking will be required.

Site 08: Harrow Leisure Centre

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 8: Harrow Leisure Centre	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. “Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a ‘core policy’ it is not necessary to repeat this again in the AAP. No change

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		proposed development will lead to overloading of existing waste water infrastructure.”		
31	Site: Leisure Centre	There is no Car Parking indicated on the Leisure Centre proposed site plan. The Leisure Centre suggested proposals look like a reduction in the area for Leisure use in favour of extensive residential development which is generally located on the current car park.	Lack of car parking facilities	The reprovision of the car parking for the Leisure Centre as part of the residential development was and is included in the site constraint text. The site allocation illustration has been amended to reflect this requirement Further work is still being undertaken by the Council to determine the most appropriate options available to improve the existing leisure offer and complex. This is likely to be the subject of a separate consultation exercise with the community outside of the AAP process

Site 09: CA and Civic Amenity and Council Depot

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 9: CA & Civic Amenity and Council Depot	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted

Sub Area: Station Road

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Para 6.5.3	The road is not one of the areas strongest assets. Surely a continuous building line will be sought on the “eastern and” western side of the road.	Continuous building line	For the most part, the eastern side of the road has a continuous building line, especially within individual blocks.
9	Sub area; Station Road	Why should the mosque be able to spill out on to this area? How do they get across the road?	New Civic Square and use by users of the	The provision of a new public space on the Civic Centre site is being proposed not just in respect of users of the mosque. However, the mosque is an existing community facility and the Council consider a public square on the

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
12	Station Road Sub Area	<p>Civic Centre site - like redevelopment ideas, but maybe six storeys high would be sufficient. Pedestrian access to Wealdstone and Harrow needs to be prominent and a large green space desirable.</p> <p>Greenhill Way car park could incorporate a permanent indoor market and a community space for youth clubs, theatre and room rentals for local societies and clubs as well as a creche for shoppers to use.</p>	Mosque	<p>Civic Centre site to be a better location for users of the mosque to congregate than on the footpath areas around the site. There is an existing signalled crossing that provides safe access across Station Road located only 20 metres to the south of the site.</p>
27	Station Road	<p>The ecosystem of small independent shops/businesses that have developed along Station Road could be severely compromised by the expansion of the larger stores in the area (e.g. Tesco) or new retail units appearing in the development areas. Clearly their financial situation will be fragile as a result of the current economic situation and additional, potentially unnecessary, competition is counterproductive to the healthy business environment of Harrow and Wealdstone.</p> <p>This is evidenced already by the increased number of empty shops in and around Harrow and Wealdstone.</p>	Tesco's expansion could jeopardise small local shops	<p>Support for redevelopment of the Civic Centre site is noted, as are concerns regarding building heights on the Civic Centre site, which have been amended and reduced.</p> <p>A key objective of the AAP for Station Road is to significantly improve its environment through greening the corridor.</p> <p>The proposal for Greenhill Way car park has been amended to provide for a wider range of uses, including civic space and potential for shared democracy and theatre provision, as well as use of the area for events and markets (although not permanent)</p> <p>As part of the application to extend the existing store, Tesco's submitted robust evidence, which the Council had independently reviewed, that concluded that the impact of the expansion would not impact small local shops. On the basis of that evidence, alongside other considerations, the application was granted.</p> <p>In respect of the need for additional retail development within the Heart of Harrow and elsewhere in the Borough, this is evidenced in the Council's Retail Study, which provides floorspace figures required to ensure that, as a minimum, Harrow maintains its current levels of market share. It should be noted that Government policy is clear that competition is not a matter on which applications can be refused.</p>
28	6.5.3 Station	<p>This is a busy 30mph road which is currently unpleasant and dangerous to cycle on, and needs to be made into a high quality</p>		<p>The potential design options for Station Road have not yet been determined and require further investigation.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
Road		<p>cycle route. There is space for continuous unidirectional cycle routes on both sides of the road, but this will require some car parking areas and bus stops to be moved, wide footways to be made slightly narrower, and fewer motor traffic lanes at junctions. The cycle routes should be segregated near junctions and wherever possible (e.g. to go safely behind bus stops), but where the road is narrow a 1.5m mandatory cycle lane can be provided instead. Transition between cycle paths and lanes should be smooth, not requiring cyclists to give way or change direction. The cycle lanes / paths should continue along Sheepcote Road, where the 4 lanes of motor traffic can be reduced to 3. The photomontage in Fig 6.29 shows no cycle facilities - this would be acceptable on quiet 20mph roads, but the reality on Station Road is that it will be much busier than the photo suggests. If the road is redeveloped without upgrading it as a cycle route the opportunity will have been wasted.</p>	Potential for cycle routes along the road	<p>This work is currently the subject of a tender process tied to the Council's capital programme for this financial year. The tender brief requires consultation and engagement with interested parties in designing potential proposals for implementation. The comments made to the AAP, and the details of the respondents, are part of the material to be provided to the successful tenderer.</p>
34	Station Road Sub Area	<p>Our three roads feed onto Station Road – one of the key sub areas identified for development and improvement in the “preferred option” plan. We are pleased the plan acknowledges the problems in this area including traffic congestion, the shabby look and feel of the area, and the difficulties experienced by cyclists and pedestrians. We support many of the key goals for Station Road including:</p> <ul style="list-style-type: none"> • Plans to improve the public realm to provide a higher quality walking and cycling environment • Efforts to address traffic congestion and improve bus access • Plans to improve the look of Station Road by upgrading shopfronts and the restoration of the Art Deco facade on the Safari Cinema • Increased landscaping with more trees and plants • The creation of new public space to “enable activity from the mosque to spill out onto this area in preference to 	Station Road improvements	<p>Support for the improvements to Station Road is noted</p> <p>All development within the Heart of Harrow will be the subject of a planning application (including the Civic Centre site), which will include both pre-application and post-application consultation with the community.</p> <p>With regards to the creation of new homes, the target for the sub-area has been reduced slightly in response to concerns over the height of development to be provided on the Civic Centre site fronting Station Road, which has been reduced and has therefore reduced the overall housing contribution this sub area is to make.</p> <p>With respect to the Magistrates Court, the Council understands that the Department for Justice has recently sold this to a charity or community organisation. As yet the Council remain unaware of the new owner's intentions for the existing build or site.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		congregating at the corner of Rosslyn Crescent”		
		The plan provides a blueprint for development and, as such, merely outlines a vision for the future. As residents living in the heart of the intensification zone we would expect to be fully consulted on any future detailed plans for development.	Consultation on detailed development proposals / applications	
		Areas of particular concern/interest for our members include plans to create up to 430 new homes in the Station Road area, plans for the former Magistrates’ Court in Rosslyn Crescent and proposals to completely re-develop the Civic Centre site.		
40	6.5 Station Road Sub Area	The Action Plan presents a somewhat confused picture of the role of Station Road. We are worried, for example, by the mention (6.5.3) of 'the balance between road users and pedestrians and cyclists' with its implication that non-motorised people are not really road-users at all but just an inconvenient obstruction for drivers!	Clarification	Paragraph 6.5.3 has been amended to clarify the intention to 'reset the balance' is in the favour of an enhanced pedestrian and cycling environment and to reduce the current dominance that traffic and vehicle movement has in and on the Station Road environment.
		Perhaps the plan is trying too hard to be all things to all people, promising 'smoother traffic flow' (which car drivers are likely to interpret as 'faster journeys') while at the same time creating 'a better pedestrian and cycle environment.' Short of comprehensive redevelopment creating a wide boulevard (an unrealistic aspiration, at least in the short term), we do not think these conflicting aims can be achieved successfully without measures aimed at bringing about radical modal change or deterring certain types of motorised use.	Conflicting aims re car / pedestrian improvements as not achievable	The Council considers the proposals need to be considered as a package of measures. Mitigation measures to smooth traffic flows are in preference to major engineering solutions to increase junction and road network capacity. They are proposed not to address traffic growth as a result of development within the Heart of Harrow but existing congestion issues caused by through traffic. Traffic impacts as a result of new development are intended to be addressed through measures aimed at modal shift.
		The first priority should be to improve the pedestrian environment by removing obstructions and forced deviations from the desire line, increasing the number of crossing points (with zebra crossings if possible) and reducing the speed of traffic through a 20 m.p.h. limit. We would like to see similar priority given to cyclists but realise that limitations on road space may make it more appropriate to encourage them to use a well-signed and prioritised parallel route. Bus priority measures should be introduced wherever possible and roadside parking eliminated	Priority should be to improve the pedestrian environment	The sub area objective to create a more consistent building line, is to assist in removing the forced deviations. In terms of the other measures mentioned, it should be noted that the potential design options for Station Road have not yet been determined and require further investigation. This work is currently the subject of a tender process tied to the Council’s capital programme for this financial year. The tender brief requires consultation and engagement with interested parties in designing potential proposals for implementation. The
			Introduce bus priority	

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>(apart from provision for disabled drivers).</p> <p>In the longer term, it may be possible to introduce shared space on parts of this road. We are interested in experiments with this in other parts of London, but would like to see how these work in practice before suggesting that the concept is introduced in Harrow. We have concerns about the impact on partially-sighted people and other vulnerable groups.</p> <p>A priority for redevelopment must be the Civic Centre. It is a disgrace that at present it appears to be a car parking development with ancillary undistinguished public buildings. We are generally happy with the Action Plan's intentions for this site (though not 'family' housing in 4-storey apartments), but hope that some of the northern part of the site can be used to improve bus/rail interchange, particularly if a new bus route from the Kodak site along Princes Drive proves feasible.</p> <p>We are concerned that the planning permission recently granted for the Tesco site appears to have violated the objectives of the Action Plan. Media publicity emphasised the 'benefit' obtained by removal of a bus priority measure. That is surely sending all the wrong signals.</p>	<p>measures</p> <p>Concern over 4 storey family housing</p> <p>New bus route potential / improved access to station</p> <p>Concern over Tesco's re bus measures</p>	<p>comments made to the AAP, and the details of the respondents, are part of the material to be provided to the successful tenderer.</p> <p>Support for the redevelopment of the Civic Centre site is noted</p> <p>The removal of this particular stretch of bus lane was part of a package of measures discussed with Transport for London aimed at improving traffic flows on Station Road, and is therefore consistent with the sub are objective.</p>

Site 10: Civic Centre

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 10: Civic Centre	It is not sustainable to demolish the Civic Centre. Development in the car park area is surely enough.	Civic Centre demolition	The current building is grossly inefficient in terms of sustainability, layout and the ability to keep pace with new technology and modern office requirements. Comprehensive adaptation, refurbishment and retrofitting are not financially viable.
9	Fig 3.3.1: Potential site layout of	Where are the key views across the site to St Mary's?	key views	It was concluded in the View Assessment that the view from the bridge should no longer be a protected view. There are currently no views within the Civic Centre site

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	preferred option (Civic Centre)			to St Mary's, however, the provision of open space on the site may offer up the opportunity for a new view but this would be subject to further assessment.
10	Site 10: Civic Centre	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change
24	Site 10: Civic Centre	GLA officers would welcome engagement with the Council with respect to the supporting land uses for this site.	Furth Engagement	Further engagement would be welcomed.
28	6.5.4 Civic Centre	If this site is redeveloped, this part of Station Road should be made wider to accommodate cycle paths or cycle lanes on both sides	Cycle lanes	The provision of new cycle paths/lanes will need to be addressed for the whole of Station Road if they are to work effectively – this may or may not require widening of the Road at certain points
34	Site: Civic Centre	The development of the Civic Centre site must be carried out in close consultation with neighbouring residents. If the plan is to re-locate the council offices and library within the site, we would also like consideration to be given to the provision of new and much-needed cultural facilities including a small art gallery, and a community meeting room/event venue that would be available to organisations like HCRA.	Consultation / Provision of new cultural facilities	Any proposal for redevelopment of the Civic Centre site will require a planning application, which includes both pre-application and post-application consultation with the community and affected parties. At the moment, all indications are that the Council will vacate the entire site and move the Civic functions into Harrow town centre (the potential new site being the Greenhill Way Car Park).

Site 11: High Road Opportunity Area

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 11: High Road opportunity area	Who is promoting the area potential missed use development as a main development site? All other such sites are in one ownership, this one is an anomaly. Has anybody talked to the freeholders?	Site assembly	This is not an anomaly – see proposal for Havelock place. The proposed change along Station Road is to be incremental overtime, however, it is important that the AAP set the strategy.
28	6.5.5 High Road	Most of the High Road is not wide enough for cycle lanes, but improvements can be made to the bridge and the area around the station. Northbound from the civic centre, cyclists should be allowed to ride on the footway up the ramp (they would be going slowly because it is uphill, and it is infrequently used by pedestrians) and space can be taken from the wide west side footway on the railway bridge to provide a cycle path. The cycle path can continue around the back of the bus stop to the station. Southbound, a cycle lane can be provided on the bridge but cyclists will then have to mix with traffic down the ramp until there is space to provide another cycle lane on Station Road.	Cycle path potential	Cycle lane improvements to form part of the design of urban realm improvements to College Road, Station Road and around Wealdstone Station and the High Street. The matters raised will be taken into account but is too detailed for inclusion in the AAP Policy document.
47	Site 11: Station Road Opportunity Area	Opportunity Site – Station Road - Site 11 – High Road opportunity Area. Whilst this site is on the East side of Station Road, and recognising that the boundary of the IA is more tightly drawn on the west side of Station Road in this area, are there now impediments which would discourage a similar improvement opportunity on the west side? How could this be encouraged?	Potential for similar allocation on the West side of Station Rd	Nothing in the AAP to prevent redevelopment opportunities coming forward on the Western side of Station Road but it is more the Eastern side where the environment and pedestrian amenity is particularly poor and needs to be addressed.

Site 12: Tesco

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 12: Tesco	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
28	6.5.6 Tescos	The Tesco site redevelopment should include segregated cycle paths on both sides of Hindes Road between the crossroads and the entrance to the Tesco car park, to allow cyclists on this key cycle route to be safe from the heavy traffic on this patch of road.	Cycle facilities	The solutions for Hindes Road depend on what approach is taken to Station Road, or else you have the ridiculous situation where 50 metres of cycle lane is provided but does not connect to a wider integrated cycle network

Site 13: Greenhill Way Car Park North

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 13: Greenhill Way Car Park North	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted
28	Site: Greenhill Way Car Park North	A pedestrian and cycle crossing facility should be constructed to cross Greenhill Way and enter Greenhill Road. In addition, the western end of Greenhill Way should be improved, with as a minimum the removal of barriers and provision of dropped kerbs to provide cycle access from side roads onto Greenhill Way.	Cycle facilities	The site allocations provide for this new connection. The use of drop curbs is more for detailed design as part of infrastructure delivery and is therefore considered beyond the scope of the AAP.

Site 14: Greenhill Way Car Park and Debenhams

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
4	Site 14 Greenhill Way Car Park	I went along to Harrow on the Hill Station to-day and discovered that the car park behind Debenhams is going to be revamped. I can go with the shops going Station Road, providing the owner are offered alternative properties, maybe the Thursday market being moved to a slightly different place in the car park - however, what I CAN'T go with is even the remotest possibility of the MOBILE Audio Clinic building being moved to an entirely different location. This facility is delivered either late Tuesday evening or extremely early Wednesday morning ready for the day's clinic to take place.		Any development proposal for the Greenhill Way car park will include consultation with existing users and the wider community. As set out in the site allocation, provision is to be made for new urban realm provision that could continue to provide for the mobile audio clinic, however there may be alternative but equally suitable locations within the town centre where this service could be provided (e.g. St Ann's Road or Havelock Place?).

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Should this clinic be relocated in a different area, this will cause severe inconvenience to a large number of people who need to be assessed for a hearing aid, be fitted with same or who are already users. Also, this clinic issues new batteries, can reprogramme the aids as appropriate- and deals with other problems when necessary.</p>		
		<p>The bus stops are located very close to the pedestrian entrance of the car park, and the station is quite close.</p>		
9	<p>Site 14: Greenhill Way car park & Debenhams</p>	<p>Why is the Debenhams site limited to 3 – 4 storeys?</p>	<p>Building height</p>	<p>Primarily because the existing car park site currently has no buildings located upon it.</p>
10	<p>Site 14: Greenhill Way Car Park and Debenhams</p>	<p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."</p>	<p>Utilities capacity</p>	<p>The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP.</p> <p>No change</p>
16	<p>Greenhill Way Car park</p>	<p>It is stated that the Greenhill Way car park "could be transformed into", among other things, a multi-storey car park. With other sizeable car parks in the area (eg, St. Anne's and St. George's) already operating close to capacity, the latter would be essential, not just something to be considered as a possibility.</p>	<p>Car Parking</p>	<p>The level of re-provision or additional car parking provision on this site needs to be tested through an updated town centre car parking study and strategy, as well as consideration to the final use of this site, its layout and design.</p>

Sub Area: Harrow Town Centre West

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
16	Harrow Western Gateway	With construction of the Morrisons store expected to finish this year, how can it be that nothing has yet been done yet to avoid the extra traffic chaos that will add to the existing dreadful congestion in the area? The council cannot allow the store to start trading until at least this aspect of infrastructure has been substantially upgraded.	Traffic mitigation	This development was granted on appeal and included a unilateral undertaking that, based on there the traffic evidence presented at the hearing, did not include significant funds towards upgrading the capacity of this junction. This will form part of the AAP transport study mitigation requirements to be funded through Council capital and CIL & TfL monies
28	6.6.3 Harrow Western Gateway	<p>The cycle path on the east side of Roxborough Bridge can be widened for two-way cycle traffic, and a cycle refuge constructed on the traffic island at the junction with College Road, allowing cyclists to cross the bridge and turn right (east) into College Road.</p> <p>Access from Roxborough Bridge to St George's centre can be improved by providing a dropped kerb at the end of the cycle path on west side of Greenhill Way, and a toucan crossing across Headstone Road leading to a segregated cycle path along the north side of Greenhill Way to St Kilda's Road, with narrowing of traffic lane from 2 to 1 lane. This would continue as a wide shared pedestrian / cycle path as far as Springfield Road, and the pelican crossing should be converted to a toucan crossing to access St George's centre.</p>	Junction improvements	The potential design options for Pinner Road junction have not yet been determined and require further investigation.
35	Harrow Western gateway	The end of Pinner Road, Neptune Point and the Roxborough bridge are NOT a gateway into Harrow. It is misleading to use the name "Harrow Western Gateway"; North Harrow, West Harrow, and South Harrow are all in Harrow and should not be forgotten. Also, we are worried that the idea of a "Gateway" might be used to justify a further tall building being built on the north side of Pinner Road, just as it was used to justify Neptune Point on the south side. We suggest that the sub-area should be called "Harrow Town Centre West" instead.	Sub area name	Agreed. The sub area name has been amended
35	Intensification Area Transitional	The inclusion of the north side of Pinner Road (Harrow Hotel and houses and gardens up to the cemetery) in the Intensification Area seems threatening. Please could you add some words to	AAP boundary	Agreed, the boundary of the AAP area has been amended to exclude the northern side of Pinner Road

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	zones	the draft Area Action Plan to the effect that residential and sensitive areas on the edge of the HWIA would not be considered for large or tall developments. In particular, any development on land backing onto Harrow Recreation Ground should not be any taller than existing buildings and should not encroach on existing gardens. Harrow Recreation Ground needs to be protected. It will be more and more needed as a resource for the expanding population.		
39	Harrow Western gateway	This sub area is dominated by several uncompromising high rise buildings which were built or begun before the AAP. They have an adverse impact on neighbouring residential communities and naming this sub area a 'gateway' does nothing to reassure those communities that things will not deteriorate further. 'Harrow Town Centre West' would be a neutral alternative.	Sub area name	Agreed. The sub area name has been amended
36	Harrow Western gateway	During the consultation period for the Core Strategy and the earlier draft of the AAP the northern boundary of the IA in this subarea varied. At that time we were discouraged from worrying about the precise position of the IA boundary. It now appears that the northern side of Pinner Road is included in the intensification area. This is a very sensitive area bordering the recreation ground and should not be considered for development under any circumstances.	AAP boundary	Agreed, the boundary of the AAP area has been amended to exclude the northern side of Pinner Road
40	6.6 Harrow Western Gateway sub area	We support the objective of encouraging pedestrian movement to the west, but are sceptical that this will be achieved (particularly after dark) if access relies on underpasses. Remodelling of the road system to reduce car-dominance and enable pedestrians to cross safely at street level should be a priority.	Pedestrian improvements	Strategic objectives have been amended to reflect the need for both underpass and street level improvements
25	Boundary Intensification Area	<p>We note, not for the first time, that the Intensification Area extends to two mainly residential areas whose inclusion does not seem to be justified in terms of any re-development, viz.:</p> <ul style="list-style-type: none"> i. Harrow Western Gateway (why not call it Harrow Town Centre West?) - the houses and gardens (also the hotel) on the north side of Pinner Road which back onto 	AAP boundary	Agreed The sub area name has been amended as has the boundary of the AAP area to exclude the northern side of Pinner Road

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Harrow Recreation Ground, a much loved and used park which enjoys Green Flag and Gold Safety Award status</p> <p>ii. Harrow Town Centre East – Ashburnham Avenue, Ashburnham Gardens and Sheepcote Road (also Harrow High School)</p> <p>The consultation document at para 5.1.43 is reassuring on building heights at the edge of the Intensification Area, referring to “a managed transition of development with neighbouring suburban areas”. In the absence of any obvious explanation for the inclusion of the areas listed above, is difficult to escape the conclusion that such areas have been included to permit the accommodation in the Intensification Area of as many tall buildings as possible and/or to make compulsory purchase of properties easier to achieve.</p>		

Site 15: Neptune Point

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
4	Site 15 Neptune Point & Site 16 Bradstowe House	Whilst the underpass is being looked at to revamp, the entrance to Lowlands Road needs some possible alteration - it is very unwelcoming once nightfall occurs. The flight of stairs under the underpass going to over the top of the railway line is again very unwelcoming, especially at nightfall and later.	Entrance to Lowlands Road	Agreed. AAP amended to include a requirement to consider alterations/improvements to the entrance of Lowlands Road within the sub-area requirements
10	Site 15: Neptune Point	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this	Utilities capacity	<p>This development has already been granted planning permission and construction is almost complete. Thames Water was consulted as part of the notification of the application.</p> <p>No change</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
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case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."

Site 16: Bradstowe House

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
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10	Site 16: Bradstowe House	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	This development has already been granted planning permission and commenced construction a number of years ago. Thames Water was consulted as part of the notification of the application. No change
12	Bradstowe House	It would be good so see Bradshaw House completed – the empty shell looks dreadful as one enters the town.	Complete development	The Council agrees

Site 17: College Road West

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 17: College Road west	Why is there no fundamental change to the bus station?	Bus Station upgrade	Many references are made to the need to improve the operational capacity and user safety associated with the Harrow Bus Station. As set out in Section 7, this will be subject to further design work and will be delivered through a range of funding measures.
10	Site 17: College Rd West	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change
28	6.6.6 College Road West	Cycle access to Harrow town centre is currently very poor. A segregated two-way cycle path can fit around the corner of site 17 on the wide footway (along Headstone Road and College Road, with a toucan crossing at the junction with Kymberley Road). Together with the short stretch of contraflow cycle lane on College Road outside St Ann's Centre that has already been approved by the council, this will create a safe and convenient route from Roxborough Bridge north roundabout via Junction Road to College Road.	Cycling facilities	Noted. Cycle lane improvements to form part of the design of urban realm improvements to College Road, Station Road and around Wealdstone Station and the High Street. The matters raised will be taken into account but is too detailed for inclusion in the AAP Policy document.

Sub Area: Harrow Town Centre

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Para 6.7.2	<p>The bus and train stations are ineffective not effective!</p> <p>The recent public realm improvements along Station Road are bland and sparse.</p> <p>You are correct in that there is a lack of a clearly story for the future of Harrow Town Centre, but this document does not provide it.</p> <p>So far as I can see the developer interest is not strong, other than Dandara.</p>	<p>Transport facilities</p> <p>Urban Realm</p> <p>Story for Harrow town centre</p> <p>Developer interest</p>	<p>Disagree with all comments. The reason this area was selected for intensification was because of the excellent transport accessibility. Facilities do need upgrading and the AAP makes provision for this. The public realm improvements to Station Road are a vast improvement on what was there previously however, there is an issue with maintenance that need to be addressed. The Council considers that the AAP does begin to set the scene and tell the storey for Harrow town centre about office renewal, new retail development, residential development, building quality and environmental quality improvements. It must be borne in mind that this is not a blank canvas and that the proposals of the AAP must be deliverable.</p>
12	Harrow Town Centre	<p>Step-free access to H-on-the-Hill Station would be good. Again development of the P.O. site would be good to see – not sure I want it to be 19 storeys high. Lowlands Road recreation ground could be a pleasant focal point for flats built on the station multi-storey and travellers approaching or leaving the station to the south.</p> <p>Developing a walk through from Havelock Place to College Road is an excellent idea especially if it incorporates public space and some child-friendly features.</p> <p>With all this extra housing in Harrow Centre are we going to need another primary school or a community school for all ages?</p>	<p>Development site proposals</p> <p>Education facilities</p>	<p>Support for the proposals of the AAP is noted.</p> <p>Provision for new required education places is being made within the area both through provision of a new primary school on the Kodak site and a new Secondary school on the Teachers Centre site, but also through permanent and temporary class rooms at local schools throughout the borough and through the redevelopment and improvement of others providing 10 additional forms of entry.</p>
15	Harrow town Centre Sub Area	<p>Whilst I am in favour of redevelopment in general, I am appalled at the height of some of the buildings proposed. The Lyon Rd site for instance, a tower of 19 storeys reducing down the road to 10 (I may have the exact figure wrong, but close enough) plus the Old Post Office site an even higher building being discussed. Both proposals are far too high for leafy green Harrow.</p> <p>I was assured avenues be left to preserve the views of Harrow Hill, which is fine if you live in line with one of those clearways,</p>	<p>Building Heights</p>	<p>The criteria of Policy AAP6 have been amended to provide greater clarity over the requirements for tall buildings in the Heart of Harrow, responding to the concerns raised in the vast majority of representations received.</p>

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		<p>but what if your view is from the side, blocked by a massive 10 storey block of flats.</p> <p>Sadly those living in flats are usually only passing through the town and have no interest in the area. I am aware of the Government's instruction to fill our Borough with strangers but surely long term residents who care deserve some consideration. Some of us, second and third generation and will probably still be here when the rest of you move on to greener pastures after ruining the skyline of Harrow. Please don't let the developers destroy our town.</p>		
18	Harrow town Centre	<p>A small, lively theatre with a coffee bar and day time activities would be a great addition to Harrow Town Centre. It would also provide a home to local drama groups which have to go outside the borough currently to access purpose built practice and performance venues.</p> <p>I believe the master plan should include such a theatre in Harrow Town Centre.</p>	Theatre provision	<p>There remain significant issues with the long-term viability of providing a theatre within Harrow town centre. However, options for provision are still being explored, especially through the relocation of the Council's Civic Centre into Harrow town centre and shared use of any newly created democratic space. While the Harrow Arts Centre at Hatch End is not ideally located to serve all in the borough, it does represent significant investment and continues to be well supported and heavily utilised. Until such time as proposals for new arts provision have been firmed up, the Council will continue to support and retain this important facility.</p>
25	Harrow Town Centre	<p>The document carries a number of references to the relocation of the central library to Harrow town centre and to the removal of the Council offices from the present Civic Centre site, presumably also to Harrow town centre. It is however silent on where these buildings might be located. Similarly the incorporation of leisure and cultural uses are promised for Harrow town centre. In a town currently starved of such facilities, this is welcome news. However, again there is no clue as to what they might be and where the planners envisage their location. Potential developers will think they need do no more than put in plans for flats and houses with a nod in the direction of ground floor commercial/community use. The application by the Lyon Road developers is a case in point; at the presentation</p>	New locations for Civic Centre and Library	<p>Details were included in the site allocations of the Preferred Option document about the potential new locations for these facilities although the Council accepts these may not have been explicit. The new Central Library, replacing the current Central Library on the Civic Centre site and Gayton Road Library, is to be located on the allocated development site 17- 51 College Road. Negotiations are still on going with the developer about the provision of the new library but these are on the whole positive. With regard to the new Civic Centre, the Council was looking at a number of options including existing office blocks of Kings House and Queens House, with potential for a civic/democracy space either on the same</p>

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		<p>last August the staff on duty were unaware of the plans for a new town centre library. The size and importance of these facilities for Harrow and its residents, both present and future, is such that their proposed siting must be an essential element of the vision for the future shape of Harrow's town centre and should therefore be included prominently in the plan. Further, it could be an important way to achieve the engagement of local residents in the planning process.</p>		<p>site or elsewhere. However, current thinking is that the Greenhill Way car park should be developed to provide for a new Civic Centre, making use of the Debenhams office building for back house staff, or alternatively again housing them either elsewhere on the site or elsewhere within the town centre (i.e. making use of large vacant office building(s)).</p>
25	Harrow Town Centre	<p>Understandably envious eyes are being cast towards modern retail centres like Ealing and Uxbridge. However changing shopping habits coupled with the effects of the recession mean that the future of such places must be uncertain. Thus Harrow has a unique opportunity to create a centre that reflects the changing trends. Chapter 8 lists some possible alternative uses and proposals are invited, as are ideas for the imaginative community use of empty properties, including their temporary usage. We suggest that a brainstorming session of the Community Forum might be organised for this purpose.</p>	Harrow town centre's retail future	<p>Agreed. This could be quite useful and would benefit from inclusion of the Harrow Town Centre Forum, as owners/managers of retail interests within the centre.</p>
28	6.7.3 Harrow town centre	<p>Link between St Ann's Road and College Road via Havelock Place should be available for cyclists as well as pedestrians. It would also be desirable for a cycle route to be provided along St Ann's Road, as there is space for it, but it would require rebuilding the road surface. The convenience of being able to park your bike just outside the shop would attract more cyclists to shop in Harrow.</p>	Havelock Place	<p>It depends on the type of connection to be made through from College Road. Given the likely narrow nature of the link, and the alternative provided to cyclists by Station Road, it may be appropriate to restrict use of this link to pedestrians but again will depend on the final design, layout and uses of the new urban realm to be created.</p>
32	Sub Area Objectives	<p>The Council have identified seven sub-areas which make up the Harrow and Wealdstone Intensification Area. Our client's site is located within Harrow Town Centre (Section 6.7). Dandara supports, in principle, the assessment and key objectives for the sub-area which seek to create greater integration across the area, improve the quality of the environment (through de-cluttering, public realm enhancements and the creation of a more cosmopolitan type environment), introduce a true mix of retail, leisure and commercial uses and</p>	Sub area objectives	<p>Support for the sub area objectives is noted. The suggested inclusion of a landmark development has been included.</p>

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		<p>promote the ‘inhabitation’ of the town centre exploiting its accessibility to public transport. The developing proposals for the College Road site embrace these objectives. However, it is considered that the Strategic Objectives for the sub area should include reference to landmark or tall buildings given that this has now been established in principle and that such a building at this site will have strategic importance within the sub area and Intensification Area as a whole.</p>		
40	6.7 Harrow town centre	<p>This is another place where a railway line acts as a barrier to movement. Priority must be given both to a good pedestrian and cycle route from College Road to Lowland Road and a step-free means of access to the station platforms.</p> <p>We welcome the proposals to improve Lowlands Recreation Ground and remove the ugly car park. It is particularly important to establish an attractive and direct vehicle-free pedestrian route through the recreation ground to the station. In general, pedestrian access to the station from the south needs improvement and traffic movements should be restricted to enable this. It is another place where a 20 m.p.h. limit would be a considerable benefit. A (new or diverted) bus service along Lowlands Road would improve access options to the station from south of the railway line and might relieve some of the pressure on the bus station.</p> <p>We are disappointed at the lack of ambition the Plan displays in securing new cultural and community facilities in the centre of Harrow. There no mention at all of the Arts Centre and the desirability of relocating it to a more accessible location. The word ‘theatre’ does not appear anywhere in the document.</p>	<p>Pedestrian and Cycle links</p> <p>Step-free Access at Harrow-on-the-Hill Station</p> <p>Cultural facilities</p>	<p>Station improvements are proposed as part of the AAP however the funding arrangements for these are yet to be agreed. Any new link over the railway is likely to be expensive, so the best option is to enhance access via existing routes through wayfinding and urban realm enhancements.</p> <p>The proposals for Lowlands Recreation ground include a new link through the open space direct to the entrance of Harrow-on-the-Hill station, which would be for pedestrians and cyclists only. Traffic improvements are not considered a priority, as need to address key junction improvements elsewhere – ditto bus movements.</p> <p>There remain significant issues with the long-term viability of providing a new cultural facility such as a theatre within Harrow town centre. However, options for provision are still being explored, especially through the relocation of the Council’s Civic Centre into Harrow town centre and shared use of any newly created democratic space. While the Harrow Arts Centre at Hatch End is not ideally located to serve all in the borough, it does represent significant investment and continues to be well supported and heavily utilised. Until such time as proposals for new arts provision have been firmed up, the Council will continue to support and retain this important facility.</p>
34	Harrow Town Centre	<p>The plan highlights the fact Harrow Town Centre’s retail offer is “dominated by middle range and value national retailers”. We</p>	<p>Harrow town centre’s retail</p>	<p>The AAP deals with the provision of additional retail floorspace to maintain Harrow’s share of future</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>would like to see a much greater emphasis on attracting high quality independent stores – including artisan food stores - to the town centre alongside more independently-owned high quality pubs and restaurants.</p> <p>Overall we would like to see a dramatic increase in the number of new trees planted within the Heart of Harrow zone.</p>	future	<p>expenditure and the town centre's Metropolitan status. Which retail occupiers take up this new floorspace is not a matter that the AAP can have control over.</p> <p>The Harrow Green Grid includes proposals for the greening of the streetscapes within the town centre and throughout the Heart of Harrow.</p>

Site 18: Havelock Place

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 18: Havelock Place	What about the street frontages to Station Road and St Anne's Road. They deserve a mention and special attention yet there is none.	Street frontages	These are not a site allocation so are covered in policies, specifically AAP1, AAP4 and AAP7
10	Site 18: Havelock Place	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted
14	Site 18: Havelock Place	<p>POL's Harrow CO falls within the Harrow Town Centre Sub-area. Further, it falls within the boundary of 'Site 18: Havelock Place' which is identified for future development.</p> <p>The site description for 'Site 18: Havelock Place' states that the area comprises:</p> <p><i>"0.57ha, backland site comprising service yards to the St Anns Centre and premises fronting Station Road and College Road, together with free standing fitness centre"</i></p> <p>Further, we note that the 'design considerations' for this site seeks to (with emphasis added):</p> <p><i>"consolidate and rationalise existing service areas and [the] redevelopment of <u>part of College Road</u> frontage to secure a new pedestrian link to Station Road and St Anns Road"</i>.</p>	Clarification	The Council can confirm that the POL site on College Road is not one of the retail units it has currently identified as having potential to provide the new pedestrian link through to Havelock Place

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		<p>Figure 6.5 broadly identifies the areas for future development within 'Site 18: Havelock Place', namely the location for mixed use development; the rationalisation of service and access yards; and creation of new public space. However, it is not clear whether POL's Harrow CO on College Road is identified for future development and we therefore request that the Council provides confirmation in this regard.</p> <p>In the event that the Council identifies POL's Harrow CO site for redevelopment as part of 'Site 18: Havelock Place', we request that the accompanying detailed policy in the emerging AAP explicitly states that this would be subject to reprovision on-site or re-location to a suitable location <u>prior</u> to any redevelopment of their site. This will ensure that POL's operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a 'universal service' for the UK, as defined by section 4 of the Postal Services Act 2000.</p>		

Site 19: 51 College Road (Dandara)

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
6	Site 19 51 College Road	I welcome the idea of relocating the central reference Library and Central Lending Library in Harrow Town Centre. However, it will be important to ensure that this not a downsizing operation and that as many seats are provided in this central Library as already exist in the Central Reference and Lending Libraries.	Central Library	The specification of the new library has yet to be determined but is a service matter outside the scope of the AAP. However, it is likely to be driven by cost efficiencies and uses to be accommodated, such as meeting rooms, exhibition space, café provision etc.
9	Site 19: 51 College Road	Harrow has never been a destination of choice and quality. It is unlikely that it ever will be.	Destination of choice and quality	Very negative comment from one of Harrow's leading architects. The AAP is all about changing the image – Harrow is part of London and the quality of development should reflect this.
9	Site 19: 51 College Road	How about the Viewing Cones from the north? Why they are not introduced?	Views	There may be instances where a tall building may be acceptable (i.e. the principle of this has already been

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 19: 51 College Road	<p>The view from the right hand “eye” in College Road is right in front of a 3 storey building!</p> <p>15 – 19 storeys is not acceptable. There is no place for this in Harrow Town Centre. There is no justification to go above the current highest level of building in the Centre.</p> <p>It is in the identified view cone from the north as well.</p> <p>The principal of a tall building was accepted by a Planning Inspector. Others may have a different opinion.</p> <p>Things have changed since then and the Views Assessment basically destroys any argument for a tall building. To say otherwise is contrived.</p> <p>No high buildings can make a significant positive contribution to the Harrow skyline. There is no need for another highly visibility asset from the Intensification Area.</p> <p>New buildings should be exemplary in terms of sustainability. There is no reason why they should not be close to zero carbon.</p>	Views	<p>established on the College Road site) but subject satisfying the revised criteria set out in Policy AAP6.</p> <p>There may be instances where a tall building may be acceptable (i.e. the principle of this has already been established on the College Road site) but subject satisfying the revised criteria set out in Policy AAP6.</p>
10	Site 19: 51 College Road	<p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. “Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of</p>	Utilities capacity	<p>This site has already been the subject of a planning application and, although not granted, Thames Water was consulted as part of the notification of the application. It should be noted that Waste Water Services was not one of the grounds on which that application was refused.</p> <p>No change</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		existing waste water infrastructure.”		
32	Site 19: Former Post Office	<p>Section 6.7.5 identifies our client's site, 51 College Road, as AAP Site 19. However, we have concern as to the way the Council and/or its consultants have sought to 'design' a potential site layout for the site and others within the AAP. There appears to be no justification for this design approach and its inclusion within the AAP is misleading and prescriptive. Our client considers that the annotation of individual blocks with potential heights could restrict the evolution of a new design for the site which embraces the objectives of the AAP. If the inclusion of heights is necessary then these should clearly be given as indicative and the commentary should highlight that the figure is an illustration of one (of many) options as to how the site may develop. It might be preferable to remove these from the figure and for the Design consideration section to include under the 'tall building' criteria comment that an acceptable scheme is likely to comprise a number of buildings of differing heights which would be expected to be in the order of 8-19 storeys.</p> <p>As it stands, Figure 6.52t implies that this is the 'right' approach or one that the Council will support.</p> <p>Despite the Council's comments in paragraph 1.4.5 that it has worked with developers and this has been useful to alert the Council to issues likely to arise in potential proposals, these have not been factored into the potential site diagram.</p>	Site Allocation for 51 College Road	<p>The diagram is intended to be illustrative and has been amended to be more diagrammatic.</p> <p>Heights are base on detailed urban design analysis</p>
32	Site 19: Former Post Office	<p>The College Road site, for example, has significant rights of light and noise constraints which impact the potential layout indicated in the figure and which would, as a consequence be undeliverable. In addition, the potential site layout shows all the ground floor area as public realm yet given the proposed minimum housing output requirement (400 units) for the sub area provides no ground floor communal space. This would be compounded further by the Policy AAP6 requirement of giving public access to roof tops and top floor and together would</p>	Site Allocation for 51 College Road	<p>The diagram is intended to be illustrative and has been amended to be more diagrammatic. The inclusion of a diagram is considered necessary and in keeping with the approach taken on all other sites.</p> <p>Reference to the requirement for public access to rooftops and top floors has also been removed.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>result in no 'door stop' play space being capable of being provided. This is wholly inappropriate, particularly as elsewhere in the draft AAP the Council state that larger developments should provide larger units. This would require residential units to either all have balconies. The potential site layout also shows the built area close to the railway line which would compromise the inclusion of balconies due to issues of noise and safety.</p> <p>These are merely a few examples of the problems of the potential site layout; but a layout that will undoubtedly be used to drive the sites design. However, it is not the role of the Council to seek to 'design' schemes through the AAP, but to set guidelines and parameters within which the site can be developed.</p> <p>Therefore the 'Potential Site Layout' should be removed.</p>		
32	Site 19: Former Post Office	<p>Our client's support the key site objectives albeit would comment that as there are currently no existing views of St Mary's Church from the site. This section should therefore be amended to reflect this.</p> <p>Minimum Outputs</p> <p>Whilst it is appreciated that the Intensification Area has a number of key objectives of its own in respect to the delivery of both jobs and new homes, our client considers that the establishment of 'minimum' outputs could prejudice the delivery of other priorities within the AAP and the development of the overall design.</p> <p>In addressing the issues reached by the Secretary of State in his appeal decision on the site, the sole reason for refusal was on the basis of architectural quality. The AAP brings forward, in the context of the urban design analysis carried out in respect to that appeal, a number of additional objectives that the site should deliver. In embracing these a new design approach has been adopted. However, in delivering the leading and</p>	Site Allocation for 51 College Road	Noted and agreed. Outputs are now expressed as targets

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		<p>supporting land use requirements, together with the requirement for increased through-site permeability, public realm and civic space, could result in a design that exceeds the parameters accepted by the Secretary of State and a building(s) which would exceed the envelope already established. Accordingly, we believe that this minimum output requirement should be expressed as a target with an applicant being required to demonstrate why this cannot be achieved where a proposal falls below the target figure.</p>		
32	Site 19: Former Post Office	<p>The use of the word 'key' in criteria 2 implies that there is already evidence that establishes views from this location as being 'key'. As no views currently exist it is inappropriate to refer to a potential view in this way until a formal assessment of it has been carried out.</p> <p>The potential site layout plan shows views to College Road however views from within the site should be equally acceptable given that this will not only become a key area of public realm within the town centre but will also lie within the primary shopping area as set out within paragraph 8.27.</p> <p>The inclusion of two different 'views' within the potential site layout of 'potential new' and 'possible future' view to St Mary's Church suggests that these are locationally specific. There is clearly no justification to support any requirement for a view in a specific location and the objective of a creating a new view to St Mary's Church should not be prescriptive as to location as this needs to be established through the necessary design process rather than taking a prescriptive approach that could prejudice development coming forward.</p>	Site constraints / dependencies	<p>Removal of the term 'key' is agreed</p> <p>Text has been amended to be clear that a new view could be located from within the site.</p> <p>The terminology has been amended to state primary and secondary desired views. Again these are not intended to be prescriptive but an indication that more than one view through or from within the site could be created. The secondary view would ideally be one from College Road and align with the opening to the Havelock place public realm.</p>
32	Site 19: Former Post Office	<p>In principle our client supports the design criteria set out which reflect the urban design assessment considered and accepted by the Secretary of State and discussions which they have been having with the Council in preparation for the submission of new proposals for the site.</p> <p>Consideration 1 confirms that the principle for a tall building on</p>	Design considerations & Figure 6.52	<p>Support for the design criteria is noted and welcomed. Amendments have been made as suggested to refer to the acceptance in principle of a building up to 19 storeys, as is the comments regarding the impact on views and the ability to create a new view from within the site.</p>

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		<p>this site. However this should be expanded</p> <p>to refer to, <i>up to 19-storeys in height</i>, which was accepted by both a Planning Inspector and the Secretary of State for Communities and Local Government. The previous appeal decision was a Secretary of State's decision and in his letter he explicitly commented on the height to which the principle was established. This point was also discussed in the Core Strategy EiP. Accordingly, we would recommend that the scale of height accepted by the Secretary of State should be included within this section and the section amended to recognise that the determination was the Secretary of State's and not an Inspector's. This would be consistent with the Core Strategy and should be reflected within the APP as well.</p> <p>Further, and with regard to the Views Assessment, the Secretary of State's position in respect to this site specifically that tall and taller buildings serving as a landmark to the town centre, higher than their surrounding buildings and which projected above Harrow Weald Ridge was acceptable should also be listed as a design consideration the principle for which has been accepted. The Views Assessment provides no new evidence to warrant setting aside the appeal Inspector and Secretary of State's view and this approach is no different to that accepted in the Core Strategy EiP and would be consistent with the comment and direction given by the Inspector then.</p> <p>With respect to the provision which seeks to improve permeability and views (Consideration number 3) we would object to the use of the word 'radically' as improvements should form part of an integrated design approach rather than what might be construed as something more overt. In respect to the comment regarding the establishment of new views to St Mary's Church this should be seen in the context of the development itself and not, as illustrated in Figure 6.52 purely from College Road. One of the key elements in exploiting the wider objectives of the AAP is the creation of restaurants and café's to contribute to the wider activity of the town centre.</p>		<p>The term radically has been removed.</p>

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32	Site 19: Former Post Office	<p>These too may wish to exploit opportunities from within the site and use the views as a catalyst. These are design issues in themselves.</p> <p>We would therefore request that this consideration be amended as follows:</p> <p><i>“Opportunity to improve physical and visual permeability into, within and through the site; the creation of new views to St Mary’s Church must be explored and assessed having regard to site constraints such as topography, design constraints and the other objectives for the AAP”</i></p> <p>The annotations on Figure 6.52 should also be amended.</p> <p>Our client would ask for clarification as to the second sentence of design consideration number 5 starting</p> <p><i>“Provide confidently scaled buildings that relate”</i> It is considered that this sentence does not specifically make any contribution to this section being subjective in nature and, in any event, it seems to be trying to recommend a requirement that has been addressed elsewhere.</p>	Views and site constraints	<p>Agree. Changes have been made to the objectives and elsewhere to reflect to suggested amendments.</p> <p>The text has been amended to clarify what was intended by this statement.</p>
32	Site 19: Former Post Office	<p>We have already made comment regarding the issue of public access to roofs/rooftops. The creation of upper level amenity areas with general public access could compromise the wider requirements of the outputs sought at this site. For example, GLA Supplementary Policy in respect to the provision of Children and Young People’s Play and Informal Recreation space will be difficult to achieve given the scale of residential provision proposed. This was demonstrated in the last proposals for the site where private communal space was provided both at roof level and ground level to meet the development needs. With the objectives for the site in terms of physical permeability, civic space and public realm at ground level, it will be difficult to deliver these and wider policy requirements if roof space is to be publically accessible as well.</p>	Public access to rooftops of tall buildings & Site specific infrastructure	<p>Agreed. Reference to public access to rooftops has been deleted in favour of applying the criteria of the London Plan in respect of incorporating publically accessible areas on upper floors, where appropriate.</p>

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		<p>If the incorporation of upper level amenity area is to serve residential occupiers then we would have no objection to its inclusion in this section subject to that clarification. If it is for public access, then our client would object on the grounds stated.</p>		
32	Site 19: Former Post Office	<p>As much as our client would like reference to the appeal as being upheld, it was in fact dismissed albeit as recognised by the Council and the Core Strategy EIP Inspector only on one key issue; architectural quality.</p> <p>Accordingly, we would ask that this section be amended to read as follows:</p> <p><i>“The site was the subject of a planning appeal in 2010 which was considered by the Secretary of State for Communities and Local Government and dismissed on the basis of architectural quality.</i></p> <p><i>The principle of the proposed re-development and a tall building of up to 19-storeys on this site was however established. The urban design analysis undertaken by the appellant and the Council have informed the design considerations above. The Council is currently in pre-application discussions with the developer (who has already presented to the Major Developments Panel) regarding new proposals for the site which build upon the previous scheme in the context of the AAP objectives and policies. It is envisaged that an application will be made in late 2012/early 2013 and assuming planning permission is granted in 2013 completion of the development on the site is expected in 2015/16.”</i></p>	Delivery	Agreed and amendments made in accordance with that suggested.
44	Site: 51 College Road	<p>It is not clear from the consultation draft AAP what status the site-specific proposals will have. For the purposes of clarity and certainty, we recommend that the site-specific proposal is given clear policy status.</p> <p>Given the ability for sites to change ownership, we do not consider it appropriate for the site proposals to be developer</p>	Status of allocations	<p>The site specific proposals are allocations within a DPD and therefore have the same statutory weight as would be afforded allocations made within the Site Allocations DPD.</p> <p>Reference to Dandara, in this instance, is not specifically to the developer but is appropriate as to many in the community this is how the sites is commonly referred to</p>

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		<p>specific (as this risks limiting future flexibility). Accordingly we recommend replacing references to any specific owner with 'the site's current owner'.</p>		<p>following the highly publicised appeal.</p>
44	Site: 51 College Road	<p>The scope of the site specific proposals for Site 19 must establish sufficient policy certainty to enable the determination of a future planning application. Having regard to this, we support the general scope of the site specific proposals in terms of: (1) establishing site objectives; (2) defining appropriate land uses; (3) defining the amount/quantum of development; and (4) establishing design principles. It is our view that the detail would benefit from refinement, and it is with this in mind that we set out detailed comments on the draft site-specific proposals below:</p>	Site Allocation for 51 College Road	<p>General support for the site specific proposals is noted</p>
44	Site: 51 College Road	<p>We support the key site objectives with the exception of 'increasing.....physical permeability of the site'. We consider that this is a matter that should be explored as part of the preparation of detailed site proposals, and that it would be premature to set it as an objective at this stage until it has been thoroughly tested in terms of urban design, accessibility, pedestrian safety, and impact on the footfall of the secondary shopping frontage. We address this matter further in the 'design considerations' section below.</p>	Site objective	<p>Disagree. This is a large site and opportunity exist to open this site up, to make it more permeable, including a new link through to College Road. The Council considers that this should form an explicit objective for the site to be taken into account in the design of a scheme proposal.</p>
		<p>In terms of recommended refinements/amendments we recommend that the objective of increasing physical permeability of the site is removed as a key site objective (and instead is dealt with in the 'design considerations' section).</p>		
44	Site: 51 College Road	<p>Our client supports the proposed land uses for the site however considers that a more flexible approach should be adopted, which could include support for further 'supporting' uses, in order to ensure effectiveness.</p> <p>It is our view that the relevant considerations in determining the appropriate land use mix for the</p> <p>site are: consistency with national policy (which includes the</p>	Supporting land uses	<p>Agreed. The list of leading and supporting land uses has been expanded to include the range of applicable town centre uses.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>requirement for town centre sites to be suitable, available and viable for the proposed use); emerging local policy; development need; the site's planning history; and deliverability.</p> <p>In terms of the policy context, the site is located within the town centre boundary (as defined on the draft Proposals Map), therefore the provisions of PPS4 dictate that the site is, in principle, suitable for 'town centre' uses (we note that these principles are carried forward in the draft National Planning Policy Framework). PPS4 defines 'town centre uses' as comprising: retail, leisure, entertainment, intensive sport/recreation facilities, offices, and arts/cultural/tourism development (including hotels), and residential. The College Road frontage is defined as a 'Secondary' frontage where PPS4 supports a 'diversity' of uses and Policy 43 of the draft Harrow Development Management Policies DPD supports retail, leisure and cultural uses at ground floor (with active frontages) and residential, offices and leisure uses at upper levels. It is with this policy context in mind that we set out comments on the proposed 'leading' and 'supporting' land uses (which includes reference to proposed site specific infrastructure) below:</p>		
44	Site: 51 College Road	<p>Leading land use – The principle of a residential-led mixed use development with commercial uses at ground and residential on upper levels has been assessed as being acceptable in planning terms by the Secretary of State and an independent Inspector, and would be consistent with the above policy context. This is reinforced by evidence of significant need for additional housing in the borough (as set out in the housing evidence prepared by the Council to inform the LDF). Furthermore, the ongoing negotiations with the current landowner clearly indicate that there is market appetite to bring forward residential-led mixed use development on the site, with a supportive financial position established by our client</p>	Leading land use	Agreed. The list of leading and supporting land uses has been expanded to include the range of applicable town centre uses.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
44	Site: 51 College Road	<p>signalling viability. It follows that residential should be the principal land use, as currently proposed.</p> <p>Supporting land uses – In policy terms a broad range of supporting ‘town-centre’ uses would be appropriate (particularly on ground/lower levels), as considered below:</p> <ul style="list-style-type: none"> - Retail – This is an appropriate location for retail in policy terms and is likely to be viable. - Leisure (including food and drink), entertainment, intensive sport/recreation, and arts/culture/tourism uses are all appropriate uses in policy terms and a combination of some/all of these would contribute to a commercially viable and attractive mix of uses. - Offices – It is our view that office development is unlikely to be viable in this location, which is reinforced by the Council’s LDF evidence. Accordingly, while the site specific proposals could allow for this land use as an appropriate supporting use (to account for potential changing market conditions over the plan period) it should not be a ‘requirement’ (on the grounds of deliverability/viability). - Civic/Community – There does not appear to be any evidence to justify how a new Harrow Library could be funded. We note that it would be unrealistic to expect this to be cross-funded by enabling development by a private developer elsewhere on the site (on viability grounds), and we would not expect it to meet the relevant tests for a planning obligation associated with the development of the site. Accordingly, while the site specific proposals could allow for ‘community/civic’ uses (to account for the eventuality of funding being made available) the reference to a new library should be deleted from the ‘site specific infrastructure’ section (on the grounds of deliverability/viability). - Public Open Space – We recommend that the terminology is revised to distinguish between ‘public realm’ and ‘public open space’ (which is generally interpreted as ‘green’ space). 	Supporting land uses	Agreed. The list of leading and supporting land uses has been expanded to include the range of applicable town centre uses.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Bearing in mind the proximity of Lowlands Recreation Ground (and the competing pressure to accommodate satisfactory levels of private amenity and play space) we consider there to be no need for public open space on this site. However we recognise the opportunity to introduce a new area of public realm within the site (as is required by the design considerations). For the purposes of clarity, we recommend removing reference to 'public open space' in the 'site specific infrastructure' section while relying on the design considerations to secure new/improved public realm within the site.</p>		
44	Site: 51 College Road	<p>It is on the basis of the above that we recommend that the policy is refined to support the following:</p> <ul style="list-style-type: none"> _ Leading land use: Residential (flats) _ Acceptable supporting land uses: Retail, leisure, entertainment, intensive sport/recreation, offices, arts/cultural/tourism, and civic/community. The proposals should be clear that these are not 'requirements' but that some/all of these non-residential uses would be acceptable as part of a mix of uses. 	Land uses	<p>Acceptable land uses applicable to development of the site have been amended to include those listed</p> <p>Dealt with in paragraph 6.1.2 as applicable to all allocated sites</p>
44	Site: 51 College Road	<p>Detailed design work undertaken to date demonstrates that the site has capacity for at least 400 dwellings, therefore our client supports the proposed 'minimum outputs'.</p>	Housing number	Support is noted
44	Site: 51 College Road	<p>Our client supports the principle of including a set of design 'considerations' with a supporting illustrative layout plan. However, it is essential that caution is exercised to ensure that these are not overly prescriptive in order to ensure that the policy incorporates sufficient flexibility to allow the highest quality design and best overall solution for the site to be progressed. It is essential that the AAP makes it expressly clear that the indicative layout plan is 'illustrative' only.</p>	Site diagram	<p>The diagram is intended to be illustrative and has been amended to be more diagrammatic. The inclusion of a diagram is considered necessary and in keeping with the approach taken on all other sites</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Accordingly, our client expresses general support for these considerations, subject to the following refinements that should account for the following points:</p>		
44	Site: 51 College Road	<p>Building Heights – The matter of building heights has been thoroughly tested, with the Secretary of State determining that the site is suitable for tall buildings (planning application ref. P/1620/08CFU). A ‘tall building’ was clearly defined by the Secretary of State as being of up to 19 storeys. The draft design considerations establish support for ‘tall’ buildings on the site, but this is not quantified in terms of storey height (or metres). In order to provide sufficient policy certainty (and avoid the risk of this matter being unnecessarily re-opened in future), we recommend that the proposal wording is refined to be clearer on this key matter. We suggest adding text that clearly states that building heights of up to 19 storeys are supported on the site, and that this should be supported in a much more promotional manner that recognizes that a tall building on this site is likely to act as a catalyst for the revitalisation of the town centre as a whole and will make a significant contribution to the achievement of many of the AAP objectives. This principle should be reflected in the illustrative layout plan which currently shows two buildings, one of 8-12 storeys the other of 15-19 storeys. While we recognise that this plan is purely illustrative and that a variation in heights across the site may be appropriate, it is premature to define these details on a plan at this stage (it should be tested (in urban design/townscape terms) as part of the preparation of planning application proposals), with the design considerations text being used as the appropriate mechanism to establish policy control over future building heights (up to 19 storeys).</p>	Building height	Amendments have been made as suggested to refer to the acceptance in principle of a building up to 19 storeys. The heights of other buildings on the site have been determined through a urban design analysis.
44	Site: 51 College Road	<p>The site forms the bulk of a well defined urban block. The provision of a new pedestrian route through the entire site (connecting College Road to Station Road) could form part of a satisfactory design solution, but other than providing access into the interior of the block we can see no discernible benefit of increasing permeability through the entire block (for</p>	Permeability	This is a large site and opportunity exist to open this site up, to make it more permeable, including a new link through to College Road. The Council considers that this should form an explicit objective for the site to be taken into account in the design of a scheme proposal but accepts the inclusion of term ‘opportunity’, as it is through

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>example, it will not significantly reduce the walk-time between the two points shown on the indicative layout plan, risks reducing footfall along Station Road/College Road (which are defined Secondary Retail Frontages), and may pose pedestrian security problems). Accordingly, we recommend revising the draft proposals to identify this as a potential 'opportunity' to be tested at the planning application stage (not a requirement).</p>		<p>development that this opportunity is to be realised.</p>
44	<p>Site: 51 College Road</p>	<p>The recommendations of the Harrow Views Assessment (2012) provide an appropriate evidence base to justify the aspiration for the creation of view corridors through the site (from College Road to St Mary's church). We recommend that clarity is added to recognise that view corridors do not need to be at ground floor (noting the level change between College Road and St Mary's Church) and that the opportunity is likely to be for view 'glimpses' (with consideration given to defining corridor widths). We recommend that the terminology used on the indicative layout plan is made consistent ('future' and 'new' are used inconsistently).</p>	<p>Views</p>	<p>Text has been amended to be clear that a new view could be located from within the site.</p> <p>The terminology has been amended to state primary and secondary desired views. Again these are not intended to be prescriptive but an indication that more than one view through or from within the site could be created. The secondary view would ideally be one from College Road and align with the opening to the Havelock place public realm.</p>
44	<p>Site: 51 College Road</p>	<p>– We recommend that a further design principle is added to establish the principle that the site is suitable for buildings with larger floorplates (subject to appropriate townscape/massing testing as part of scheme preparation) which are likely to be required by the proposed land uses and in order to be compatible with the proposed building heights. This principle should be reflected in a revised indicative layout plan which currently shows very shallow/narrow floorplates which could prove difficult to achieve.</p>	<p>Building Footplates /Footprints</p>	<p>As stated previously, the diagram is intended to be illustrative and has been amended to be more diagrammatic. The appropriate of a larger building footprint will need to be considered against the ability of the proposal to meet the other objectives and policies for this site, including the creation of a quality public realm as a landing point for a tall building, increasing the site's permeable, the ability to create a new view from within the site, the relationship to neighbouring buildings etc</p>
44	<p>Site: 51 College Road</p>	<p>As noted above, our client is committed to supporting the redevelopment of the College Road site which is coupled with clear evidence of developer interest in bringing forward the site, which together establish a clear route to delivery (and therefore underpin the soundness of the draft site specific proposals).</p> <p>Deliverability is dependant on a supportive site-specific policy position being established in the AAP that allows a viable form</p>	<p>Site Allocation for 51 College Road</p>	<p>The general support for the AAP proposals, particularly in respect of this site, is noted and welcomed by the Council</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>of development to proceed, and which incorporates sufficient flexibility. Consequently, it is dependant on the comments set out in this representation (above) being positively addressed in the next draft of the AAP and carried through to adoption.</p> <p>In conclusion, our client would like to reiterate its in-principle support for the preferred option AAP proposals, particularly in respect to Site 19, and looks forward to engaging further with the Council in due course.</p>		

Site 20: Harrow on the Hill car park west

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 20: Harrow on the Hill car park west	Needs better turning and drop off facilities. It is chaos most of the time.	Turning and Drop off facilities	Agreed. Such considerations will form part of the more detailed design considerations for the improvements to Lowlands Recreation Ground
9	Site 20: Harrow on the Hill car park west	If it is not an identified development site there is no consistency in this document for it to be included. There are many other sites equally worthy of inclusion on this basis and indeed there is every right for the document to be far wider ranging than it is.	Delivery	The site is owned by TfL who have indicated support for the site's inclusions within the AAP for redevelopment (see comment of ID 39 below)
10	Site 20: Harrow on the Hill Car Park West	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted
39	Site 20 and 22	<p>We support the broad principles and objectives of the Harrow and Wealdstone AAP in particular development proposals on site 20 and site 22, subject to commercial viability.</p> <p>As a landowner we would welcome the opportunity to discuss the development opportunities on the site and wider area in more detail.</p>	Owner support	Noted and welcomed by the Council

Site 21: Lowlands Recreation Ground

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 21: Lowlands recreation Ground	The design conflicts with what should be a better turning and drop off area.	Turning and Drop off facilities	Agreed. Such considerations will form part of the more detailed design considerations for the improvements to Lowlands Recreation Ground
28	6.7.7 Lowlands Recreation Ground	Also consider a cycle path along Lowlands Road / Tyburn Lane / Kenton Road leading to the Northwick Park Roundabout. This is a busy route with much traffic and is currently unattractive for cycling, but forms part of an important route between Harrow on the Hill station and Northwick Park Hospital / University of Westminster. The footway on the south side of Kenton Road is infrequently used and can be widened and converted to a shared use path. The cycle path should continue to Tyburn Lane through the junction with Peterborough Road (via a toucan crossing) and alongside The Grove Open Space at least as far as Harrow on the Hill station.	Cycle facilities	Noted. However, there are no proposals currently for a cycle path along Lowlands Road / Tyburn Lane / Kenton Road leading to the Northwick Park Roundabout, and unfortunately this is considered a lower order priority by the Council given the range of improvements to be delivered elsewhere across the Heart of Harrow.

Site 22: Harrow on the Hill car park

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 22: Harrow on the Hill Car Park East	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted
39	Site 20 and 22	We support the broad principles and objectives of the Harrow and Wealdstone AAP in particular development proposals on site 20 and site 22, subject to commercial viability. As a landowner we would welcome the opportunity to discuss the development opportunities on the site and wider area in more detail.	Owner support	Noted and welcomed by the Council

Sub Area: Harrow Town Centre East

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Sub area: Harrow town centre east	What other uses – very few.	Land Uses	Noted. The ones specified are those considered by the Council to be appropriate to the sub-area.
40	6.8 Harrow town centre east	We are concerned that many of the apartments proposed for this area will be used for housing young families in overcrowded conditions, within both the social and private rented sectors. Some genuinely affordable low-rise family housing should be included. Density and green-space provision could be maintained by making the developments car-free. This would be an appropriate measure so close to the town centre with its very good public transport facilities.	Housing types	The site is within the town centre boundary and therefore densities are reflective of its location. The proposal will provide for a range of new residential accommodation for which there is an identified need and shortage – including private and affordable units – See the West London Strategic Housing Market Assessment available on the Council's website. The level of car parking proposed and amenity green space is consistent with the policy position.

Site 23: Lyon Road

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 23: Lyon Road	<p>There is no justification for 12 – 14 storeys. It is outside the main Town Centre, probably within the visibility arc from Wood Farm.</p> <p>It is also in the transition zone next to much lower neighbours.</p> <p>It should be less in height than Platinum House.</p> <p>It is commendable to put a statement building on the corner, but this does not require over dominance or height.</p> <p>Why is there no proposal or suggestion for the buildings on the east side of the road opposite?</p>	Building height	Building heights have been informed through both the AAP urban design analysis as well as site specific studies in support of the planning applications for this site. The Council considers the building heights proposed to be acceptable give the site's town centre location and the layout to provide for the transition sought at the town centre boundary.
9	Site 23: Lyon Road	<p>Design considerations.</p> <p>The buildings do not have to be tall to be special character. The character will not benefit from a large public realm opportunity.</p> <p>Large = overwhelm.</p>	Building height	Building heights have been informed through both the AAP urban design analysis as well as site specific studies in support of the planning applications for this site. The Council considers the building heights proposed to be acceptable give the site's town centre location and the layout to provide for the transition sought at the town

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>The buildings should be “Exemplar” buildings.</p> <p>The building should be highly sustainable and close to zero carbon. This should be included.</p>		<p>centre boundary.</p> <p>The sustainability of the development has been informed through detailed studies and accords to London Plan requirements.</p>
10	Site 23: Lyon Road	<p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. “Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”</p>	Utilities capacity	<p>The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a ‘core policy’ it is not necessary to repeat this again in the AAP.</p> <p>No change</p>
20	Fig 6.61 Lyon House	<p>The appropriate height of a building depends on many factors, including its architectural quality. We consider that specific heights should be omitted from the diagram as being too blunt and prescriptive. Moreover, office floor to floor dimensions are different from residential so it is potentially misleading to specify the number of storeys in isolation.</p>	Building Heights	<p>The Council considers it appropriate to include building heights within the design considerations as these have been informed by an urban design analysis undertaken by East Architects. We do however, note the difference between commercial and residential floor-to-floor building heights.</p>
42	Site: Lyon Road	<p>We notice that importance is attached to “carefully negotiating the transition between...” town centre and residential areas. This seems to be disregarded with the suggestion for a 14 storey building at the Lyon Road/ St.Johns Road junction. Even allowing for the lower ground level here than at the southern end of Lyon Road, such a building would be intrusive to residences as far away as Grange Road which, incidentally, are at an even lower ground level. This photo, taken from Grange</p>	Building heights and Transition	<p>The Council considers the building heights proposed to be acceptable give the site’s town centre location and the layout to provide for the transition sought at the town centre boundary.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		Road, clearly shows Platinum House. The proposed 14 storey building would be nearly twice as high and thus protrude significantly above the houses opposite the end of Grange Road.		

Site 24: Gayton Road

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 24: Gayton Road	Why are the buildings on the south only 3- 5 storeys? They should be the higher ones as they are next to the railway and will not over dominate the small scale residential to the north or east.	Building heights	Agreed. Design considerations amended to include taller buildings along the railway
10	Site 24: Gayton Road	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities infrastructure	<p>Planning permission for development of this site has already been granted, although not implemented. Thames Water was consulted as part of the notification of the application. Any new proposal for the site will be subject to Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP.</p> <p>No change</p>

Additional Sites Proposed by Respondents

ID	Section / Para	Summary of Comments	Council Response
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ID	Section / Para	Summary of Comments	Council Response
7	General: Additional Proposed Site Allocation	<p>In reply to your letter of 12th January 2011 regarding the Harrow and Wealdstone Area Action Plan, we have a number of concerns. As you may be aware we have been in contact with the Council for a number of years regarding our desire to be included in the new L.D.F.</p> <p>Firstly we have twice put ourselves forward for development under the call for sites to no avail. Having ratified the lawful status of our current retail use on the bottom three acres of our land via a certificate of lawful development (Feb 2011), we are therefore surprised to see that our land appears not to have been included within the red line of the Harrow Action Plan, even though we are only two minutes from the main harrow on the Hill tube station and town centre.</p> <p>Is it too late for our site with its main road and public transport links 9or at least the retail area) to be reconsidered for inclusion within this area and its present exclusion to be rectified?</p> <p>The Council's own commissioned 'Retailing in Harrow' study 2006 identifies the need for larger units to encourage well known retailers into Harrow. It also states that if this is not possible in the town centre it should be as near as possible to the town centre. As a underutilised existing retail site our land fits these criteria perfectly.</p> <p>At the very least the bottom 3 acres of retail brownfield site should have been included in the 'Action Zone' as it represents an ideal opportunity to achieve some of harrow Council's goals and ambitions to improve Harrow town centre.</p> <p>We look forward to hearing the Council's thoughts and response to this matter.</p> <p>My father David Ward is the owner of 10 acres of land in central Harrow, which includes the Plantation Garden Centre and extends from the Kenton Rd up to the junction with Peterborough Rd and on to the public footpath just below the garlands. We are very concerned that our substantial strategic land does not appear to be included in the Harrow intensification area or on the proposed LDF list of sites. We have twice put our land forward under the call for sites for mixed use development and are surprised that with our excellent central location and proximity to transport hubs we have not been included whilst other sites without these advantages have been. We would ask that the Council considers the following points, with a view to moving the red line of the intensification area to include our land or at the very least the bottom 3 acres which currently have retail use.</p> <p>The Land</p> <p>Bottom 3 acres [Plantation Garden Centre], established 20 years ago with limited planning permission legalised for modern retail use via certificate of lawful development Feb 2011. The Plantation Garden Centre has over 2500m2 of covered retail structures why are these not</p>	<p>The Plantation Garden site is outside of the current AAP boundary area. Nevertheless, the land is designated Metropolitan Open Land, and therefore the Council considers that its allocation for more intensive development would be at odds with the Core Strategy.</p>

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shown on the LDF map.

The top part of the land [approx 1.5 acres] is currently residential and includes a large house with grounds and overgrown double tennis courts.

The middle section of the land [approx 5 acres] is a derelict plant nursery and disused sports pavilion see photos. This section has become a magnet for intruders and the pavilion was actually occupied by squatters last year.

The land is currently designated metropolitan open land, however over the years the London Borough of Harrow has granted permission for development on both metropolitan open land and green belt. In fact the granting of permission for limited development on such land often 'opens up the land' to the public, which as with our land was previously not the case. This is especially so if some public amenity is included in any development proposal.

Transport Links

The land is less than 2 minutes walk from Harrow on the Hill tube station and Harrow Bus Station. These are the main public transport hubs for Harrow,

By car the land is 2 minutes drive from Northwick Park roundabout which is the main entry point to Harrow for people driving from Kenton/Kingsbury, Sudbury/Wembley and Harrow Weald. With these excellent communication links the land more than meets all Harrow Councils requirements for both residential and retail development.

In conclusion we would ask again that our land be put on the list of sites within the Councils proposed LDF and included within the Harrow intensification area. The reasons why have been given above but the following should also be taken into account.

Primarily due to its location and current residential use the Peterborough rd section of the land in particular would be perfect for a luxury residential development. The London Assemblies London Plan puts an emphasis on local authorities offering a range of housing developments to meet the needs of different sections of the community. However Harrow Councils current list of proposed sites does not reflect this, as all the current proposed sites are for low cost, high density development.

The encouragement of higher value development and the more affluent resident it attracts would have a number of long term benefits for Harrow. Not least the increase in council tax revenue and the fact that many A/B income residents use private schools and medical care and are therefore much less likely to put a strain on local amenities. Also there is a knock on effect of increased trade for local businesses, retailing in particular benefits from attracting and

ID	Section / Para	Summary of Comments	Council Response
		<p>retaining high earning residents.</p> <p>Harrow and Harrow on the Hill has a large number of affluent residents whose housing needs are not currently being catered for, forcing them to look outside the Borough.</p> <p>The addition of our land to the proposed list of sites and inclusion within the intensification area would address this shortfall in the Councils current housing development strategy and enable the council to meet its obligations under the London Plan to offer a range of housing development.</p> <p>In conclusion we would ask again that our land be put on the list of sites within the Councils proposed LDF and included within the Harrow intensification area. The reasons why have been given above but the following should also be taken into account.</p> <p>Primarily due to its location and current residential use the Peterborough rd section of the land in particular would be perfect for a luxury residential development. The London Assemblies London Plan puts an emphasis on local authorities offering a range of housing developments to meet the needs of different sections of the community. However Harrow Councils current list of proposed sites does not reflect this, as all the current proposed sites are for low cost, high density development.</p> <p>The encouragement of higher value development and the more affluent resident it attracts would have a number of long term benefits for Harrow. Not least the increase in council tax revenue and the fact that many A/B income residents use private schools and medical care and are therefore much less likely to put a strain on local amenities. Also there is a knock on effect of increased trade for local businesses, retailing in particular benefits from attracting and retaining high earning residents.</p> <p>Harrow and Harrow on the Hill has a large number of affluent residents whose housing needs are not currently being catered for, forcing them to look outside the Borough.</p> <p>The addition of our land to the proposed list of sites and inclusion within the intensification area would address this shortfall in the Councils current housing development strategy and enable the council to meet its obligations under the London Plan to offer a range of housing development.</p>	
11	Site: Wickes House	<p>Openscope Limited owns Wickes House, which was developed on the site of a former Wickes store and has been occupied as the companies UK headquarters since its construction in approximately 1988.</p> <p>The property is located on the fringes of Harrow Town Centre and occupies a prominent corner</p>	<p>The Council notes that the site is currently occupied (at least for another year). The Council also notes that no evidence of the marketing undertaken of the site has been offered up upon which to gauge levels of</p>

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		<p>position at the junction with Station Road, Elmgrove Road and Hindes Road, directly opposite a large Tesco superstore.</p> <p>Wickes House is constructed of steel portal frame with brick elevations over ground and two upper floors and provides approximately 2,350m² of net internal office accommodation. The building is designed around a central ground floor entrance and service core, providing a single 8 person passenger lift to the first and second floors with male and female washroom facilities provided on each floor.</p> <p>The office space is arranged either side of the central service core, and provides flexible accommodation with windows to both the front and rear of the building. Internally the office space is now tired and dated and will require refurbishment once Wickes vacate in September 2013. The building has been under utilised by Wickes for some years and we are informed that the company has now initiated a search for an alternative building in the area.</p> <p>To the rear of the building is a self-contained car park providing 59 spaces.</p> <p>Given Wickes House will be vacated next year, Openscope is currently discussing the possibility of converting the property into a 116 bedroom hotel with officers. Chamberlain Commercial has assessed the local office market as well as the viability of retaining offices. A copy of their report can be made available if necessary.</p> <p>Chamberlain Commercial has concluded that the Harrow office market is generally made up of small local businesses predominantly from the financial services industry. These 180 to 220m² occupiers have been most reluctant to relocate their offices in recent years. Previously the local market would operate from a continual stream of lease renewals and break options where an occupier may look to relocate within the area in an attempt to secure better lease terms. In recent times, these occupiers have tended to negotiate terms with existing landlords rather than incur the capital expenditure of relocating and fit-out costs etc. A major source of demand has been removed from the local market by occupiers simply preferring to stay put in their current accommodation.</p> <p>Harrow has traditionally been a popular office location for the banking industry. Until recently Santander, GE Capital and First National Bank were all major space occupiers within the Town Centre. A large proportion of Central Harrow offices were occupied as satellite banking offices such as RBS Business Bank, Royal Bank of Scotland and NatWest Commercial. Recent rationalisation within the banking industry has resulted in many banks relocating away from the Town. Previously these occupiers attracted a host of dependent firms such as solicitors and</p>	<p>interest. The building is of good quality in comparison to most stock within the AAP area. The proposals put forward (with the exception of the hotel development) would be inconsistent with the objective of the AAP to renew the office market. In light of these matters, and without further robust evidence, it is not considered appropriate to include the site as an allocation within the AAP at this time. If the site was to come forward for development, the Council considers that the policies of the AAP and the objectives for this sub-area will provide sufficient basis upon which to determine the merits of the proposal.</p>

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financial services advisors. The loss of major bank occupiers has been coupled with a fall in demand for Town Centre office space.

The low office values in Harrow had previously proved attractive to occupiers with Government led contracts or service providers to the Local Authority. Previously there was a continual stream of demand from Social Services agencies, employment services organisations such as those running training courses for long term unemployed. However, as a consequence to the cuts in public services the demand for office space from these types of occupiers has fallen significantly. The same is true for NHS and PCT contractors who previously led a steady stream of space requirements into the local office market.

Harrow continues to suffer with a huge oversupply of available office stock and the immediate prospects for the market look bleak, with no sign of recovery in local demand and further space coming to the market all the time.

Viability of Refurbishment for Offices

Chamberlain Commercial believes that the demand for a self contained building of this size is non-existent and therefore the building will need to be offered in smaller suites. Again, demand is limited and the prospect of achieving more than 50% occupation is unlikely due to the abundance of office suites available in the 220 to 460m2 range and the overall lack of demand. It would be financially impossible for the Landlord to carry 50% void costs on a building of this size, the services for the entire building would need to be continued despite only being partially occupied. The business rates would still need to be paid and the level of income would be insufficient to service the finance costs.

Wickes House will require full refurbishment should the Landlord seek re-occupation from a traditional office occupier. Given the location and based on market levels over the previous 10 years, the refurbished office space would be worth approximately £10 per sq ft. It is unlikely an office occupier would take a lease commitment of longer than 5 years so the landlords could expect to see an income of £1,250,000 over the 5 year term, assuming an occupier could be found. On this basis, the refurbishment of Wickes House is unviable.

The refurbishment works required at Wickes House are conservatively estimated at £500,000 i.e. £20 per sq ft. This would provide cosmetic refurbishment to the interior office areas and common parts. It would not cover renewal of the air conditioning system and lift plant.

We would expect a marketing period of at least 2 years for a building of this size and location

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which would mean a void cost of £750,000 based on the estimated rental value of £10 per sq ft. and vacant rates liability of £125,000 per annum.

In the unlikely event that a tenant was forthcoming, the level of incentives that would normally be expected on a building of this size is approximately 1 year's rent, either by way of a rent free period or a capital contribution, i.e. the Landlord will need to pay the incoming tenant £250,000 to take a 5 year lease.

If we calculate the costs involved in attracting an office tenant the total spend is likely to exceed the potential rental income by £250,000.

The Landlords will effectively spend £1,500,000 trying to secure a rental income of £1,250,000.

The underlying issue is that there is simply insufficient demand for office space and whilst Wickes House has not been marketed, there is no evidence to suggest the building will prove any more successful in attracting office occupiers than the other more centrally located buildings currently available in the Town.

Hotel Demand

As an agent familiar with Harrow, chamberlain Commercial consider there is strong demand for further hotel space in Central Harrow, which is evident by the number of recent planning applications for new hotel schemes. We are aware of current demand for a further 500 hotel bedrooms in Central Harrow based on the requirements from budget hotel operators and smaller boutique hoteliers. Hotel conversion is clearly an attractive option for office landlords as the alternative uses of college and community use offer only a short term solution for the problem of vacant buildings.

Residential

The property also offers the opportunity to accommodate residential development for which there is much need particularly in this central location.

AAP

The aims of the AAP as set out on page 3 are supported as are the objectives set out on page 30. However, it must be acknowledged that the quantum and quality of office floorspace is out of kilt with demand; there is a clear over supply of office space. Therefore, objective 8 must be

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		<p>clarified in line with the fourth bullet point in paragraph 4.5.1 and more importantly with policies AAP 14, AAP 15 and AAP 16</p> <p>Chapter 6 relates to the Station Road sub area (6.5) and identifies a number of key sites with several strategic objectives set out on page 125.</p> <p>Given the findings of Chamberlain Commercial it would be prudent to specifically identify Wickes House as a key site with potential for the introduction of ground floor active uses along the Station</p> <p>Road frontage and a hotel above. This would not only enhance the retail offer along Station Road, but also potentially generate a significant number of local jobs and a use that is in demand in the area.</p> <p>Equally, the site could accommodate residential development above ground floor active uses.</p> <p>Alternatively, there is no reason why the <i>Areas of potential mixed use development</i> designation could not include Wickes House again recognising the development potential of this site.</p> <p>Conclusion</p> <p>Wickes currently occupy Wickes House as their headquarters. However, they have notified the landlord of their intention to vacate the property next year and will ideally seek alternative premises in Harrow.</p> <p>Chamberlain Commercial considers there is a lack of demand for offices in this area. Notwithstanding this, it is not viable to refurbish the building. Chamberlain considers that there is a market for hotel uses and that this building would make a suitable conversion to such a use. In addition, the building would be suitable for a residential conversion.</p> <p>Therefore, we consider that the AAP should specifically identify Wickes House as a development opportunity comprising active ground floor uses on the Station Road frontage with a hotel and/or residential above.</p> <p>We would be happy to discuss this matter further. In the meantime, if you require any further information or clarification please do not hesitate to contact us.</p>	
33	Site: Wealdstone	As per our November 2010 reps towards the 'Call for Sites' consultation and our comments towards the Harrow & Wealdstone AAP in June 2011, the MOPC/MPS recommend that Wealdstone Police Station is allocated for a residential-led development within the emerging	The Council considers that the redevelopment of the existing Wealdstone Police Station could form part of the AAP

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	Police Station	<p data-bbox="434 209 495 236">AAP.</p> <p data-bbox="434 264 1541 612">The designation of particular policing facilities for redevelopment allows the MOPC/MPS to implement their Estate Strategy which seeks to rationalise outdated and unfit for purpose facilities. It is pertinent to note that no existing policing facilities will be disposed of until relevant replacement provision has been provided and is fully operational. This ensures that effective borough policing will continue and complies with Policy 3.16 of the London Plan which states that proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure <u>without realistic proposals for re-provision</u> (my emphasis) should be resisted. This is also supported by Policy CS 1 (criterion z) of the final draft Core Strategy states that the loss of community facilities will be resisted unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities.</p> <p data-bbox="434 641 1541 794">The MOPC/MPS note that paragraph 17 of the Council's response to the representations received towards the Issues and Options version of the AAP states that '<i>...it is not considered appropriate at this stage to provide detailed comments as to the future potential uses of sites. Site specific proposals are to form the basis of the consultation on the Council's Preferred Options</i>'.</p> <p data-bbox="434 823 1541 1235">Mindful of this, should the Wealdstone Police Station site become surplus to MOPC/MPS' future need, there will be no policy requirement to provide alternative community uses. In terms of potential alternative uses, the building is constrained by its Grade II Listing status and therefore lends itself to residential conversion. Similarly, the yard area to the rear of the site would usefully provide commercial floorspace at ground floor with residential above and would comply with PPS4 requirement for a mix of town centre uses. Whilst the Council can demonstrate a 5-year supply of housing to meet the Mayor's target, this target represents a minimum and is appropriately assessed in parallel with London Plan Policy 3.4 which requires development plan preparation to optimise housing output. Additionally, the emerging National Planning Policy Framework (NPPF) seeks to ensure LPAs identify an additional 20% housing supply pipeline in order to ensure housing supply is robust. The identification of this key site within the AAP for residential-led redevelopment will assist in meeting these strategic objectives</p>	<p data-bbox="1581 209 2112 979">site allocations, as it would help to contribute towards the regeneration of the Wealdstone town centre. However, the Core Strategy is clear that the loss of existing community facilities should be resisted unless adequate arrangements are in place for their replacement or for the enhancement of other facilities – thereby releasing this facility. As such, officers meet with the agents acting on behalf of the Metropolitan Police to understand the arrangements to be made to service the borough and what this would mean in terms of Harrow existing police estate. It was made clear that such information would be required to justify the loss of the facility. The agents were therefore requested to provide to the Council an updated estates strategy or other evidence as appropriate, to demonstrate how provision to serve the area is proposed to be met. To date such evidence has not been provided, and without it, the allocation of the site for change of use would be at odds with the Core Strategy (Policy CS1Z)</p>
34	Site: Magistrates Court	<p data-bbox="434 1264 1541 1414">We are deeply concerned about the future of the former Magistrates' Court site in Rosslyn Crescent. The building has already fallen into disrepair and is deteriorating fast with a negative impact on the overall environment in Rosslyn Crescent. We would like the redevelopment of the site to be made a priority and in the meantime want to see it maintained to a certain standard, including the removal of litter that has continued to accumulate in the</p>	<p data-bbox="1581 1264 2112 1414">With respect to the Magistrates Court, the Council understands that the Department for Justice has recently sold this to a charity or community organisation. As yet the Council remain unaware of the new owner's</p>

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55	Site: 2A Tudor Road	<p>grounds. We would like to see the court building, a building with history, character and many original features, retained as one of the “landmark” buildings envisioned for the Station Road area.</p> <p>Our client owns Aerospace House, 2A Tudor Road, Harrow HA3 5PE (the Site). The Site was built previously and separately to the Whitefriars Industrial Estate which lies directly to the South. Adjacent to the Site to the North are residential properties and to the East lies a playing field adjoining the school. Cecil / Tudor Road is to the West. There is a width restriction in the road just South of the entrance to the Site.</p> <p>Our client has occupied the Site for 13 years, operating two successful businesses, and is very keen to stay. However, due to the Site’s inherent problems and it not being fit for purpose, together with seeking expansion, it has become necessary to seek alternative premises.</p> <p>Our client currently employs between 20 and 30 staff plus cleaners. Once in their new premises they will employ between 80 to 100 staff and provide substantial training programmes in-house, and are therefore a significant employer in and asset to the Borough.</p> <p>The sale of the Site is necessary to fund the acquisition of suitable alternative premises.</p> <p>The Site is therefore being put forward for residential-led mixed use through these representations.</p> <p>The high cost of upgrading the Site for industrial uses is not economically viable, and would be compounded by the Site consequently being left vacant due a lack of demand due to the reasons discussed below. A viability statement accompanies these representations and should be read in conjunction.</p> <p>The width restriction poses a real problem in attracting and accommodating future industrial and employment use occupiers. It is not possible for larger vehicles to access the Site easily as they cannot drive from the north end of Cecil Road. Our Client has had discussions with the Council in order to request that the width restriction is moved, but this was not permitted.</p> <p>In addition, the Site is adjacent to residential properties and Units 1 to 5 of the industrial estate present a clear and natural boundary between these uses, with an existing significant wall separating the Site from the industrial estate.</p> <p>In considering the proposed development of a school on the existing playing fields, a residential use would be much more appropriate in terms of environment and a neighbouring use.</p>	<p>intentions for the existing build or site.</p> <p>Discussions have been ongoing between the Council and the owners of the Areospace House site to understand their premises requirements, how these might be meet within the borough and any level of enabling development required to facilitate their relocation. The site has limited potential for alternative land uses. Its configuration and access arrangements limit residential development, and its location is limiting to other non-town centre economic uses. However, the Council notes the concerns of the community regarding the delivery of a new secondary school on the neighbouring Teachers Centre site and consider it appropriate to include the Areospace House site within an extended boundary to the Teachers Centre site allocation and to allocate for continued industrial use as well as education / training / community and economic (non-town centre) uses. This would provide a number of options for the proponent of a new secondary school both in terms of the location of buildings on the site as well as the internalisation of traffic impacts on the local road network.</p>

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Furthermore, the occupiers of the Whitefriars Industrial estate access their units via the northern end of Tudor Road, away from the Site due to the width restriction. Therefore the Site again presents itself as separate from the industrial estate and suitable for residential use. If the Site were to be in residential use, it would have its own access for cars as larger vehicles would not be able pass through.

In considering these points, the Site is demonstrable as suitable for alternative uses, in particular residential use, whether this is the sole use, or as part of a mixed-use scheme.

On this basis, a brief overview of the relevant points within the emerging and adopted planning policy is set out below.

PPS 1 - Delivering Sustainable Development

More efficient use of land is sought through higher density, mixed use development and the use of suitably located previously developed land and buildings.

PPS 3 - Housing

Residential development should be located where there is good access to jobs, key services and infrastructure. A flexible, responsive supply of land should be provided, making efficient and effective use of land including re-use of previously developed land.

Harrow UDP (Saved policies, 2007)The Site falls within a business and industrial area. The corresponding policy relates to the Whitefriars Industrial Estate, but as the Site technically falls outside of this it is not relevant. Policy EM15 provides assessment criteria for sites to be released for alternative uses, and incorporates the following; there is sufficient provision of other B1, B2 or B8 premises, there will be no unacceptable harm to the local economy, there is evidence that the site has been marketed for these uses and that there is poor vehicular access. If the site is not appropriate solely for B1, B2 or B8 use, the feasibility of a mixed-use scheme should be investigated.

Core Strategy, Development Plan Document (2011)

The Site falls within an industrial and business use area and an intensification area. The document states that through the Harrow and Wealdstone Area Action Plan, “... consolidation of ... industrial and business use areas (specifically the function and boundary of these designations)...” will be considered.

Core Policy CS1 provides a sequential approach in considering the release of surplus stock of

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		<p>employment land for alternative uses as detailed below. The Site falls into the second category of five, “...<i>Poorer quality allocated sites not within strategic industrial locations; ...</i> “</p> <p>Within the intensification area, provision for jobs and, “...<i>residential and mixed use development,...</i>” should be made. Wealdstone is also identified as a focus for regeneration, “... <i>providing a substantial proportion of the ... housing growth. Urban realm enhancements and the provision of mixed use development will drive a new urban form ...</i>”</p> <p>The Site is within the ‘Harrow and Wealdstone sub area’ where a minimum of new 2,800 homes and 3,000 jobs will be sought (Core Policy CS2 Harrow and Wealdstone).</p> <p><u>The Draft National Planning Policy Framework (July 2011)</u></p> <p>In terms of alternative uses, planning policies and decisions should, “... <i>make effective use of land, promote mixed use developments that create more vibrant places, and encourage multiple benefits from the use of land ...</i>” An increased supply of housing is also encouraged so as to meet needs.</p> <p>With regard to economic use, local planning authorities should, “... <i>work ... with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.</i>”</p> <p>Facilitation of new working practices, for example live/work schemes is also supported.</p> <p>Pertinently, in terms of the Site, the document advises that planning policies should, “... <i>avoid the long term protection of employment land or floorspace, and applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses</i>”</p> <p>In respect of the environment and in considering future land uses, consideration should be given to the, “...<i>environmental quality or potential quality regardless of its previous or existing use</i>” and, “... <i>seek to secure a good standard of amenity for existing and future occupants of land and buildings.</i>”</p> <p><u>Development Management Policies DPD, Regulation 25 Consultation (2011)</u></p> <p>Policy 30 New Housing advises that previously developed land is the preferred location for housing. Furthermore, land on the edge of the urban area close to public transport and local services is deemed appropriate for housing development.</p>	

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		<p>Therefore adopted and emerging planning policy support residential led mixed use at the Site. Such a scheme is an efficient use of previously developed land suitably located with good access to jobs, local facilities and services. There is sufficient supply of industrial uses within the area, and it is our client's intention that the use will not be lost from the Borough, only relocated within it. The local environment will be improved and the Site is secondly preferential in the sequential approach to the provision of other uses on existing industrial sites. The proposed change to policy provides, as detailed in policy itself, an opportunity for the Council to work with the business community to understand their needs and address current issues.</p> <p>A residential-led mixed use scheme on the Site would be in accordance with Policy as it would secure the retention of an existing business and employer in the Borough and would provide a higher standard of design and amenity whilst assisting the Council in reaching their housing targets.</p> <p>It is acknowledged that further requirements are detailed in Policy AAP 15 of the Area Action Plan in respect of active marketing, vacancy period, oversupply of similar buildings, other uses and masterplanning. However, due to the timescales of this particular case it is not possible to complete these at this stage. However agents are instructed and a feasibility statement accompanies these representations which details the local market and the marketing of the premises. Furthermore, in line with the other requirements, there existing buildings are a barrier to their continued use, a residential mixed-use scheme would achieve a good level of amenity and it could integrated with existing facilities.</p> <p>In considering the Site's location outside of the Whitefrairs Industrial Estate, the difficulties the width restriction poses in terms of access and therefore in accommodating future industrial occupiers, together with the Client's aspirations for their business, we respectfully request that the Site is treated as separate to the rest of the industrial estate and is therefore alternatively put forward as suitable for a residential led mixed-use scheme, and not solely for industrial/business and employment uses.</p> <p>This is in line with viability, the local economy, the environment and the objectives of prevailing planning policy. This alteration would enable the Site to become available for redevelopment for suitable alternative uses, allow Aerospace 2000 to remain in the Borough, expanding and providing further employment opportunities and income, thereby supporting the local economic base by retaining the industrial and employment use and an important local business. Furthermore, the development will assist the Council in reaching their housing targets as part of a sustainable development appropriate to the Site, it's size and location.</p>	

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		<p>The Site provides a natural break from the industrial estate as it is adjacent to a residential area and has a strong defensible boundary to the north where the current playing fields and proposed secondary school are located. A residential-led scheme on the Site would provide a suitable 'neighbour' to the surrounding uses, in a location where it is accessible in terms of local facilities and public transport.</p> <p>Furthermore the Site comprises premises of a low quality and is located outside of the Strategic Industrial Location. Therefore it is secondly preferential in the sequential approach to the release of employment land for other uses, and a new development would be provided with an improved environment and better quality buildings.</p> <p>The inclusion of this Site strictly for business and employment uses only will prevent and/or delay future development and economic growth.</p> <p>On this basis, the AAP should be amended to reflect this and in accordance with prevailing planning policy we ask that the Site is not incorporated within the boundary of the industrial and business use area, so that it may come forward for a residential led mixed use scheme, thereby enabling future use of the Site. On a site specific basis, the option of a 'site swap' may be considered.</p>	

Outputs Across the Sub Areas

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24	Employment	<p>The preferred option draft Harrow and Wealdstone Area Action Plan identifies potential for the delivery of 3,000 new jobs within the Harrow and Wealdstone intensification area up to 2026. This figure is also supported by the post examination stage Harrow Core Strategy.</p> <p>Officers note that this figure would exceed the indicative employment capacity of 2,000 jobs identified for the intensification area by London Plan Policy 2.13. This is strongly supported.</p> <p>The Area Action Plan seeks to deliver these employment opportunities primarily through consolidation and renewal of business space and rejuvenation of the retail environment</p>	Employment figure	Support for the employment figure to be delivered in the Heart of Harrow area is noted

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		<p>within Harrow metropolitan town centre, and promoting employment-led regeneration of business and industrial sites in Wealdstone. Key to the latter is a proposal for comprehensive employment-led redevelopment of part of the Wealdstone preferred industrial location, developed as part of a strategically coordinated process of strategic industrial location (SIL) consolidation.</p>		
25	Housing and Jobs Targets	<p>Two of the objectives for the Intensification area are a minimum of 2800 net new homes and a minimum of 3000 additional new jobs (para 4.3.1). These figures are derived from the Core Strategy for Harrow. However table 6.3 (Outputs across the sub-areas) on page 173 gives rather different totals. The figure for homes is shown as 3505 minimum to 3810 maximum and as 3130 minimum to 4010 maximum for jobs. Whether by accident or design, it is the case that each of the latter maximum figures exceeds the objective figures by 1010. This discrepancy needs to be resolved. If the higher figures are to be the objectives, we should like to know why Harrow, one of the more densely populated outer London boroughs and one which was already exceeding its housing target pre-Core Strategy, is placing this unnecessary extra burden on itself.</p>	Housing and Jobs targets	<p>Targets within the Core Strategy and the AAP are a minimum. To provide certainty that the targets can be delivered the AAP rightly allocates land and prescribes development to meet and exceed these targets, on the basis that, should not all allocated land come forward for development over the plan period, sufficient sites remain to deliver on the minimum requirements. Should all sites come forward, the Council has the ability, in the latter stages of the plan to be more prescriptive about the benefits to be delivered by such development.</p>
27	Housing	<p>The Area Action Plan follows the directive to increase housing, but this automatically increases the population density of Harrow. The latest publically available population density for Harrow is 41 people per hectare (25th highest out of over 350 local authorities) and is 10 times the National average of 3.8 people per hectare. (England 2001). I consider it is unreasonable to increase the population density of one of the most densely populated areas of England. It is unlikely to promote social wellbeing and will not be sustainable.</p>	Population density	<p>The London Borough of Harrow is one of 33 boroughs that form the Greater London Area. As such Harrow must play its part in accommodating London's growth and the Core Strategy has established the spatial strategy for how this is to be achieved locally. It should be noted that, of the 33 London boroughs, Harrow has one of the smallest housing requirements, reflecting the limited availability of developable land. However, as already shown through the AAP baseline work, and one of the main reasons for selecting this area as one for intensification and growth, is the large availability of developable sites within the Heart of Harrow area, which will and should come forward for redevelopment – which needs to be appropriately planned for through the AAP.</p>

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27	Jobs	<p>There is an urgent need for employment in Harrow. However the jobs must be sustainable. Most of the new jobs occurring from the developments in the Area Action Plan seem to be in the retail sector. Employment in the retail sector is extremely fragile in the current economic climate and this is evidenced by the increasing numbers of empty shops.</p> <p>Jobs need to be created based on sustainable employment to justify the investment in development otherwise the numbers of empty shops and offices will continue to increase.</p>	Employment target	Much of the new jobs will actually be created through redevelopment of the existing industrial estates such as Kodak. Much work has been undertaken to ensure that the provision of new employment floorspace can contribute to growing Harrow's economic base of small to medium enterprises. New retail development is typically viable in all instances, and therefore should be supported as being sustainable.

Chapter 7: Delivery and Implementation

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9	Delivery and implementation	A pedestrian bridge from Kodak site to the heart of Wealdstone will be dangerous, unsafe, ugly, expensive and unnecessary. It will not achieve a satisfactory east west link.	Bridge crossing	Enhancing access across the railway is desirable, however amendments have been made to enable this to be delivered as both a bridge or underpass but it will be subject to viability and its delivery a long-term objective.
13	7.1.4	<p>7.1.4 Key Projects second one – re-write: - a pedestrian and cycle route (underpass or bridge) from Kodak site to heart of Wealdstone</p> <p>7.2 Infrastructure schedule fig. 7.1 ref Wealdstone / Movement amend from Pedestrian Bridge to Pedestrian and cycle bridge or underpass</p>	Bridge crossing	Suggested amendments are made
13		An oversight? - I found no mention of provision for allotments or growing areas in the I.A. The I.A. includes those parts of Harrow which are furthest from existing allotments. I feel that at least some new allotments should be included in the plans, partly as a facility that the additional >4000 new residents [see 2.2.1] will need, and partly as a contribution to greening the borough generally.	Allotments	There is no provision for allotments as there is no significant increase in the amount of open space to be provided within the Heart of Harrow area. However, most significant open spaces are located on the fringe of the area and development will contribute to the qualitative enhancement of such spaces. Where existing allotments exist that could potentially serve the area, consideration will

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				<p>be given to demand against other open spaces uses or efficiencies that can be made to meet such need. Noting also that many of the development will result in the provision of family housing with gardens or communal space that could also be used for growth produce.</p>
9	Para 7.1.9	<p>Critically is a key word and most essential. This forms the catalyst of making Harrow a proper Metropolitan Centre. It should include the bus station. The word critically is not recognised in the remainder of the document where the station improvements are watered down or overlooked.</p>	Terminology	<p>The Council does not assign priority to the delivery of one type of infrastructure over others, as they all represent a package of measures required to support new development and to make the Heart of Harrow a more pleasant place to live. Funding of such infrastructure is key to its priority. See the Infrastructure Delivery Plan for a more detailed explanation of infrastructure priorities, funding and delivery.</p>
14	National Policy	<p>Policy Considerations</p> <p>The requests set out above in respect of POL’s Wealdstone CO/OFF and Harrow CO sites accords with Planning Policy Statement 4 (PPS4): Planning for Sustainable Economic Development. Which details that LPAs should plan positively and proactively to encourage economic development, in line with the principles of sustainable development. In particular, PPS4 states that LPAs should develop flexible policies which are able to respond to economic change and notes the need for co-ordination with infrastructure and housing provision.</p> <p>Further, we note the Government’s draft National Planning Policy Framework (NPPF) which is the most up-to-date statement of national policy. Albeit in draft form, we note the contents of particular relevance:</p> <ul style="list-style-type: none"> ■ requires investment in business <i>“not be over-burdened by the combined requirements of planning policy”</i>; and ■ requires local planning policy to <i>“have a clear understanding of business needs within the economic markets operating in and across their area”</i>. <p>We reserve the right to amend or supplement these representations at a later date if necessary. We would be</p>	None	Noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	Costs and Funding	<p>grateful if you could acknowledge receipt of our representations and advise us as to the next stages of the emerging Harrow and Wealdstone AAP.</p> <p>For clarity, the Council are encouraged to include a reference to the emerging Mayoral Community Infrastructure Levy (CIL) which will be applied in addition to the CIL that is being developed by Harrow Council.</p> <p>Following consultation on both a Preliminary Draft, and then a Draft Charging Schedule, the Mayor submitted the charging schedule and supporting evidence for consideration at an Examination in Public in late November/early December 2011. Application of the CIL charge is expected to commence in spring 2012 and will be paid by most new development in Greater London.</p> <p>The Mayor is proposing to arrange boroughs into three charging bands with rates of £50/£35/£20 per square metre of net increase in floor space respectively. For the London Borough of Harrow, the proposed Mayoral charge is £35 per square metre. The Mayor's CIL will contribute towards the funding of Crossrail, and further details are available via the GLA website www.london.gov.uk.</p>	CIL	Reference to the Mayor CIL has been made in the context of likely levels of funding to be raised by the Harrow CIL towards top-up funding of local infrastructure
30	Section 7	<p>Other than the creation of a new transport hub and a welcoming gateway to Harrow Town Centre it is important to provide better permeability through the shopping centre. The 'opening up' of Havelock Place will certainly improve the pedestrian link between College Road and St. Ann's Road and provide the opportunity for more retail and café facilities.</p> <p>Arts and cultural buildings could be developed around a restored art-deco Safari cinema.</p> <p>There should be the opportunity given for the development of a theatre, arts/exhibition gallery, visitor centre and library in Harrow Town Centre.</p>	Public realm enhancements and cultural facilities	<p>The first point is addressed in Policy AAP7</p> <p>With regard to cultural provision, there remain significant issues with the long-term viability of providing cultural facilities, such as a theatre, within Harrow town centre. However, options for provision are still being explored, especially through the relocation of the Council's Civic Centre into Harrow town centre and shared use of any newly created democratic space. While the Harrow Arts Centre at Hatch End is not ideally located to serve all in the borough, it does represent significant investment and continues to be well supported and heavily utilised. Until such time as proposals for new arts provision have been</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
32	Chapter 7 Delivery and Implementation	<p>Equally, it may well be possible to provide such facilities in a rejuvenated Wealdstone Town Centre.</p> <p>The delivery of development at College Road will address and contribute to a number of the Key Projects identified in Paragraph 7.1.2. However, we consider that this section should also manage wider expectations as to what individual developments can realistically achieve in terms of contributions to social and other infrastructure. It would be helpful if this section could, for the benefit of the community, set out the overarching assumptions and parameters established in viability testing and the limits set in terms of developer returns etc, having regard to the availability of development finance, that result in identifying the values available for S106 contributions/affordable housing delivery. In this regard comment should also be included as to the likely effects that the Crossrail CIL will have on contributions which would otherwise have been available to the Borough and, other strategic CIL contributions that may come forward in the future (eg. associated with the funding on HS2).</p> <p>We believe that there should be a clear acknowledgement that individual schemes should be commercial viable to ensure that they are individually deliverable. It has been a common trait nationally that developments that have proved unviable have either not been delivered or have been abandoned midconstruction. This would not be conducive to achieving the objectives of the AAP or Intensification Area. The establishment of a Harrow CIL, which we are aware is proposed, will enabling the pooling of funds and provide greater robustness in delivering wider improvements with the Borough, particularly Harrow town centre.</p>	Development viability CIL	<p>firmed up, the Council will continue to support and retain this important facility.</p> <p>Such information is set out in the development viability testing study undertaken by GVA in support of the Core Strategy. GVA were commissioned as part of the consultant team to advise the Council on development capacity, viability and infrastructure requirements. This was done to ensure that what the Council proposed through the AAP was commercially viable and deliverable. However, it is acknowledge that individual site appraisals will still be required to truly understand the finances of each scheme, the key variable being the cost of the land paid by the developer, which can never be captured in an area wide study.</p> <p>The Council agrees with the comments regarding the Harrow CIL, and also notes that this will be based on development viability considerations. An update to the GVA viability study is therefore likely to be undertaken to support this work and will again be made available on the Council's website as part of the evidence base underpinning the CIL and the AAP.</p>
36	Infrastructure Chapter 7	<p>The timely provision of infrastructure is essential to successful regeneration of central Harrow and this was identified as a major concern in earlier consultations. However while transport, waste, open space etc. are covered by individual policies in chapter 5, 'community infrastructure' is not. There is</p>	Cultural facilities	<p>With regard to cultural provision, there remain significant issues with the long-term viability of providing cultural facilities, such as a theatre, within Harrow town centre. However, options for provision are still being explored, especially through the relocation of the Council's Civic</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>only reference to the Development Management Policies DPD which covers the borough as a whole. Furthermore, chapter 7, which covers the delivery of infrastructure, lists schools, a health clinic and leisure complex but does not mention cultural facilities. In the Core Strategy these are acknowledged to be severely lacking and should have a much higher profile in the AAP.</p>		<p>Centre into Harrow town centre and shared use of any newly created democratic space. While the Harrow Arts Centre at Hatch End is not ideally located to serve all in the borough, it does represent significant investment and continues to be well supported and heavily utilised. Until such time as proposals for new arts provision have been firmed up, the Council will continue to support and retain this important facility.</p>
47	7.2	<p>P.178 Section 7.2 Infrastructure schedule – There appears to be no provision for a Health clinic /centre or Community facilities on the Kodak site (site 02).</p>	<p>Heath clinic on Kodak site</p>	<p>This has been amended as both are being required/ provided as part of the proposed redevelopment of the Kodak site.</p>
48	Infrastructure	<p><u>Infrastructure</u>. Will the future education and health provision be adequate? As development will be spread over a period, will the developers' contribution be phased in? As the population grows, is the central government contribution increased? As an example of already overstretched resources, the Northwick Surgery is very busy, making it difficult to get an appointment. I understand that Action plan is necessary as a framework to ensure that this all works, but there appear to be long term too many uncertainties.</p>	<p>Adequacy of infrastructure</p>	<p>A very detailed assessment of current surpluses and shortfalls in infrastructure provision was undertaken as part of the Harrow Core Strategy. This also identified the need for new facilities to make up any identified shortfalls as well meet to meet the needs of changing demographics and the requirements arising from new development within the Heart of Harrow and across the borough. See the Infrastructure Assessment and Delivery Plan. This has been used to inform the infrastructure requirements to support the Harrow Community Infrastructure Levy. The requirements set out in the AAP are considered adequate to meet the needs of the existing as well as proposed populations within this area over the plan period.</p>
50	Chapter 7 Delivery and Implementation	<p>Paragraph 7.1.2 outlines the key projects which have been identified which are central to the Harrow and Wealdstone Intensification Area. The outline planning application for Harrow View seeks to bring forward a large number of these projects including public and open space link with Headstone Manor to Wealdstone, upgraded pedestrian links with Wealdstone town centre and a new school.</p> <p>Land Securities consider that there should be an acknowledgement of commercial viability and requirement for enabling uses, such as retail, within major developments to</p>	<p>Development viability</p>	<p>GVA were commissioned as part of the consultant team to advise the Council on development capacity, viability and infrastructure requirements. This was done to ensure that what the Council proposed through the AAP was commercially viable and deliverable. However, it is acknowledge that individual site appraisals will still be required to truly understand the finances of each scheme, the key variable being the cost of the land paid by the developer, which can never be captured in an area wide study.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		ensure sufficient employment uses can be provided. Further to this the incoming Mayoral CIL will squeeze S106 contributions for the Local Planning Authority, so this will need to be taken into account to ensure the infrastructure required comes forward and the funding requirements are realistic in terms of expectations and can actually be delivered.		

Chapter 8: Retail, Employment and Other Planning Designations

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Section 8 photo	1950's or 2012? This road section does not even deserve mention anywhere in the document. As such it will be ignored and remain as a sub standard, low grade, cheap shopping parade dwarfed by tall buildings around the edge. This part of Station Road, College Road, and St Anne's Road should be carefully analysed and a proper Town Centre Design Guide should be formulated. Without this the document is incomplete and just resolves the Council's major issues not the people's main issues. There is a significant difference.	Photo	Photo has been removed from the AAP. Concerns are noted.
30	Section 8	Flexibility in approaching planning enquiries and applications is important to retaining the vitality and 'buzz' of a town centre street. There should be the opportunity for innovative, owners, developers and entrepreneurs to come up with different but exciting ideas for change of uses within all the town centres in the borough. Given the number of out-of-town retail parks and inner-city superstores it is now evident that towns will not have the same level of retail shop frontage as before and there will inevitably be long-term empty shops and a slow decline of the high street. Allowing a change of use will provide the opportunity for a redundant retail unit to have a new lease of life and encourage new businesses into the area.	Retail frontages	The concerns raised are already addressed in the relevant town centre policies of the AAP re flexibility in design of ground floor to ensure these remain adaptable to changing circumstances and provision for temporary uses.

Appendices and Glossary

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Appendix A Identified intensification area sites	Is 13 under construction? Too much emphasis on these sites. No enough direction, master planning or thought for the area as a whole. The difficult issues have not been tackled.	Appendix A site 13	No – this scheme has planning permission and the footnote was meant to acknowledge this as well as schemes under construction. However, this appendix has been removed from the final document as this map with the sites is now provided in the introduction to the AAP.
30	Appendix A	Appendix A plan identifies the obvious development sites. It could be considered that the majority of Station Road is littered with small development sites given the age and condition of the properties. Through incentives owners and developers could be encouraged to redevelop the properties with four, five or six-storey mixed use boulevard schemes with public realm at ground level and residential or offices above.	Windfall sites	The Council considers it appropriate to allocate major development opportunity sites but that AAP provides for windfall sites to come forward, which will be assessed against the policies of the plan and the contribution they will make toward delivery of the AAP spatial strategy.
9	Appendix B Glossary	Heart of Harrow should be defined in the glossary.	Define the Heart of Harrow	This is now defined within the introduction to the AAP and is referred to throughout.
33	Glossary	The MOPC/MPS support the inclusion of a definition of community facilities (which includes policing facilities) within the glossary of the emerging AAP. This is consistent with national and strategic guidance and should therefore be retained.	Community facilities definition	Support is noted

Sustainability Appraisal and Habitats Assessment

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
29	Sustainability Appraisal	The approach and methodology used is acceptable to Natural England and in line with the advice that would be offered. Topics and issued we would expect to see considered are included in the Sustainability Appraisal and the sixteen	SA Methodology	Support for the SA methodology is noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>sustainability Objectives listed can be broadly supported, especially:</p> <p>SO2: Quality and Quantity of Open Spaces;</p> <p>SO3: Conservation and Enhancement of Biodiversity.</p> <p>The reference to PPS 9: Biodiversity and Geological Conservation are welcomed, and there appears to be no reference in the main document, though other Policy documents are.</p>		
29	Habitats Regulations Assessment	<p>Similarly the methodology and approach used in the Habitat Regulation Assessment are acceptable to Natural England and in line with advice that would be offered.</p> <p>The Conclusion that stages 2 and 3 of the Habitat Regulation Assessment requiring a full Appropriate Assessment are not required for this document can be agreed by Natural England.</p> <p>To assist the Council Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the Green Grid section of the document. The London Landscape Framework can be found at:</p> <p>http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx</p> <p>The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites.</p> <p>Subject to the above Natural England has no further substantive comments to make on this consultation document,</p>	Habitats Reg Assessment Methodology	Support for the Habitats Regulations Assessment methodology is noted
38	Sustainability Appraisal	<p>SWMP</p> <p>Your Surface Water Management Plan (SWMP) is in its final stages and should form part of the evidence base in your Sustainability Appraisal (SA). The recommendations of the</p>	SA to refer to SWMP recommendations	Agreed. Appropriate amendments made

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
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SWMP should also be brought forward in the SA

Harrow Views Assessment

ID	Section / Para	Summary of Comments	Change	Council Response
1	Pages 46/47 Pages 74/75	The architect suggested that considerations in assessing our “Views” should include the character of the workplace and occupation of the viewer: and that the “Views” chosen must be ‘robust’. But surely: just by designating ‘A View’, the implication is that people consciously (visit to) enjoy it: for which they may need time and “space”. Or alternatively that it will stand out - commanding attention. I believe this particular view does not fulfil those qualifications. It is restricted, seen only from parts of what was Clarendon Road. Too many of those using it seem not to appreciate it: they may not even realise it is there. Thus it is not in the same category as the vistas or panoramas from Old Redding, the entrance inside Harrow Recreation Ground, or from Grove Hill: on all of which there was a large degree of consensus at the meeting.	The proposed protected view from St. Ann’s Road not in the same category as others and does not merit protection.	The Harrow Views Assessment has assessed the view from St. Ann’s Road in accordance with the LVMF and finds that it does merit protection, noting that some people will observe the view and appreciate it. No change.
1	Pages 46/47 Pages 74/75	The benefit: “The View” initially is a very narrow one. Through the gap above the bus station (which allows light into the area) one sees the tops of some trees and part of St Mary’s Church spire. The purpose of designating this as ‘a view’ might be to use it in an argument to preserve this gap in any plans for future redevelopment, to prevent the erection there of buildings that are ‘too high’. If so, that is welcome but how realistic is it as an aim? It must be doubtful, given the height of the various blocks (6, 8, 10 storeys and more) already sited there on College Road.	The protection of the proposed view from St. Ann’s Road is not realistic in the context of existing development.	The Harrow Views Assessment has assessed the view in accordance with the LVMF and finds that it does merit protection, noting the striking contrast between the landmark and the foreground townscape. No change.
1	Pages 46/47 Pages 74/75	Problems: the first is that the chosen ‘View’ is dominated by Graffiti . Large white letters painted on the building on Lowlands Road stand out. Visible along the whole of the pathway, even from the far side of Greenhill Way, they are the focal point. Why would anyone visit to see a Graffiti site: why include one in our Plan?	The proposed protected view from St. Ann’s Road is dominated by graffiti.	The Harrow Views Assessment sets out visual manage guidance which includes the potential actions to improve the view. The final Views Assessment report has been amended to recognise the need to improve the setting of the view by the removal of graffiti.

1	Pages 46/47 Pages 74/75	<p>The Passage itself: assessing this on the basis of the criteria stated, it does not score highly: and it is hardly 'uplifting'. Entering from Greenhill Way . . the right-hand side is the wall of the St George's Centre: on the left is the side wall of the Royal Oak - an aged building with stains and masses of pipes down it, and a paved and railed rear area. The path is littered at times, some pavings are chipped and repairs have been made with 'filler'. It is all functional, and indicative of the amount of . . . [sic]</p>	The visual setting for the proposed St. Ann's Road view from the passage (from Greenhill Way) is poor.	The Harrow Views Assessment identifies the viewing location of the proposed St. Ann's Road view from the public square outside St. George's Shopping Centre, not the passage referred to. No change.
1	Pages 46/47 Pages 74/75	<p>Traffic: This pathway is a major gateway so is extremely well-used. Pedestrians generally walk with purpose in both directions: heads down, many wearing headphones – headed for a destination. Admiring the view does not seem to be at the top of their agenda: does 'the view' even register with them?</p> <p>Crossway: Pedestrians visiting the St George's Centre do not seem to be particularly bothered either. Tromping along, they look straight ahead - focused only on entry or exit. It is incredible. At busy times, anyone trying to walk in the opposite direction (e.g to the station) almost has to force their way through this volume of traffic.</p> <p>I see no evidence that they may 'stop (or even glance) and stare' to the side view</p>	As a busy area within the town centre pedestrians are unlikely to enjoy or even notice the proposed view from St. Ann's Road.	The Harrow Views Assessment has assessed the view in accordance with the LVMF and finds that it does merit protection, noting the some passers by will not be focused on the more distant view. The Report recognises the potential to improve the viewing location (the public square outside St. George's Shopping Centre) as part of public realm enhancements. No change.
1	Pages 46/47 Pages 74/75	<p>Vitality: It was stated that there is 'a cafe' nearby: there is not. There is the Royal Oak pub. This has many tables and chairs placed across its frontage, quite often occupied even by a few customers. But on fine summer evenings when those tables are full, other people can be stood around on the concourse in front and at the side of them too. The numbers and sheer volume of noise can be quite intimidating then for (lone) pedestrians. Nor do the patrons appear to be looking for or at the "view": they are too intent on their own purposes and conversation.</p>	Patrons using the forecourt of the Royal Oak public house are unlikely to focus on the proposed view from St. Ann's Road.	The Harrow Views Assessment has assessed the view in accordance with the LVMF and finds that it does merit protection, noting the proposed viewing location is next to a public house with outdoor seating. No change.

1	Pages 46/47 Pages 74/75	<p>Analysing the View: The top part of the Spire only is visible above the trees, initially from certain points in the road: from others it is hidden behind the large buildings on College Road. I am sorry to say that I consider the snapshot view in the photograph displayed is almost misleading: giving a very restricted view ahead. Taken from 'this side' of the bollards near 'Monsoon'/the empty shop on the other corner, it captured the effect of the sun on the windows of Kings House - which is attractive: but you have to seek out the right spot there to see 'the Spire'.</p>	St. Mary's Church spire is only visible above the trees and from certain points in the viewing location of the proposed view from St. Ann's Road.	In response to this representation the extent of the viewing location in the final Views Assessment report has been revised to ensure that it properly represents a location where St. Mary's Church spire can be seen.
1	Pages 46/47 Pages 74/75	<p>The Wider Aspect: Once through the bollards, walking up to College Road 'the Spire' is seen more frequently. But the perception is that it is fighting gamely to hold on to its position against the large buildings that seem close by - to the side and in front of it. Literally, it seems to be 'clinging on'. As such, it is a sad relic of 'the (whole) View' that presumably there once was from this road.</p> <p>Other Views – Dominating Structures: To revert to 'Monsoon' area: just through the bollards the whole opens out and at once the character changes. On the left is St Ann's complex. That large open servicing area is backed by the Centre itself, which joins its huge multi-storey car-park and that merges in front of you with the Hygeia building on the corner of College Road. 'The Spire' is subsumed and diminished by these large structures: which create a totally different perspective.</p>	In the approach to College Road surrounding large buildings compete with the view of St. Mary's Church Spire.	The Harrow Views Assessment identifies the viewing location of the proposed St. Ann's Road view from the public square outside St. George's Shopping Centre, not the passage which extends southward to College Road. No change.
1	Pages 46/47 Pages 74/75	<p>Alternative - Kymberley Road: Standing at the corner of the St George's building, in front to the right is Kings House. Further right is Queens House with its own multi-storey car-park. These are large (at least 8 storey) gloomy structures. The main entrance of Kings House is at the rear facing that of Queens House. The two buildings are bridged by a joint first-floor over Kymberley Road so they become one huge whole, stretching away down Kymberley Road. This cluster of large buildings in such close proximity becomes 'the view': they have a harsh certain reality all their own (almost Lowrie-like). But it is very difficult to look through them to glimpse St Mary's Spire/the Hill. This will have even greater emphasis when Bradstowe House (at the far right end of Kymberley Road) may ever be completed.</p>	Kings House and Queens House make it difficult to glimpse St. Mary's/Harrow Hill; Bradstowe House may never be completed.	Kings/Queens House help to 'frame' this view on the west side, although the Report recognises as a strategic aim the desirability of removing/remodelling buildings to improve the foreground setting of this view. Bradstowe House is not relevant to the proposed protected view from St. Ann's Road. No change.

1	Pages 46/47 Pages 74/75	Cars. I think there were None shown in the slide? They must be factored into the equation. During shopping hours vehicles consistently exiting St Ann's car-park on the left are joined sometimes by cars coming down Clarendon Road. The one-way traffic system in operation into the Town Centre means this traffic is amalgamated with that coming down through Kymberley Road, and it all has to pass under the first floor of Kings/Queens House. There is gridlock here at busy times (e.g.Christmas shopping) and even at some others caused by the sheer volume of traffic).	Cars use Clarendon Road during shopping hours and there is grid lock at busy times.	In response to this representation the final Views Assessment report has been amended to recognise the desirability of reducing traffic flows along Clarendon Road.
1	Pages 46/47 Pages 74/75	Enjoying The View: Will anyone then choose to come here specifically to see 'The View'? Or, will anyone trying to reach College Road through such hazards catch sight of and be uplifted by it? I doubt it.	Unlikely that people will come to this location to enjoy the view.	The Harrow Views Assessment assessed the view in accordance with the LVMF and finds that it does merit protection, noting the some passers by will not be focused on the more distant view. No change.
1	Pages 46/47 Pages 74/75	Conclusion: For all these reasons I believe this should not be included as a Protected View: and that to do so could even prejudice the Council's position in relation to the other 5 Views discussed at the meeting.	The view from St. Ann's Road should not be protected and may undermine the value of others.	The Harrow Views Assessment assessed the view in accordance with the LVMF and finds that it does merit protection. The impact of a proposal must be considered on each protected view affected by that proposal and in accordance with London Plan/local policy criteria. No change.
9	General	This assessment is generally well conceived, but it needs to be rigorously endorsed by the Area Action Plan. The following comments mainly reflect where it does not.	Good assessment but needs to be endorsed by AAP.	Noted. Pre-submission Policy AAP6, various AAP site allocations, and pre-submission Policy 3 of the Development Management Policies DPD, aim to give effect to the findings of the Assessment (along with the London Plan). No change.
9	Page 6 (London Views Management Framework)	The triangular viewing corridor should be calculated from a number of points in the viewing location, this extending the triangle into more a rectangle. The yellow zone is as equally important as the red zone, especially where panoramic views are concerned. Buildings in the yellow zone should be scrutinised equally as in the red zone to protect the wider scene.	Viewing corridors should not be calculated from a single point. The yellow	For practical (budgetary) reasons only one assessment point has been identified per viewing location. However given the relatively small extent of all of Harrow's viewing locations it was considered that additional assessment points would not afford significant additional protection nor, given the distances of the assessment points to the landmark concerned, create 'rectangular' view cones. However the identification of viewing locations may enable future decision makers to consider how a proposal impacts the dynamics of the view from viewing location as part of the context for appreciating the view from the identified assessment point. No change. In accordance with the LVMF the yellow 'wider setting

			zone and development within it should be treated as in the red zone.	consultation area' performs a different function to the red 'landmark viewing corridor'. The yellow zone is integral to the viewer's ability to recognise and appreciate the landmark – in this case allowing St. Mary's Church to be viewed in its setting atop Harrow Hill. The LVMF requires development in the wider setting consultation area to 'preserve or enhance' the viewers ability to recognise and appreciate the landmark. No change.
9	Page 8 (Topography of Harrow)	This is a key diagram to show Harrow on the Hill and the Harrow Weald ridge as high points. There are no significant tall buildings in the plane between thus providing a striking panorama view of The Hill. The existing maximum height of the buildings in the Town Centre do not interrupt these long range vistas and this is commendable and should be protected.	There should be no significant tall buildings in the plane between Harrow Hill and Harrow Weald Ridge.	The Harrow Views Assessment is an evidence base document. The question of tall buildings, informed by the Views Assessment, is a matter for the AAP itself and is addressed in the pre-submission document by Policy AAP 6. Policy 3 of the Development Management Policies DPD gives effect to the Assessment for considering the impact of development proposals on views. No change.
9	Pages 14/15	I believe this should be a protected view. It is a main artery into Harrow and provides the glimpse and perception of going south towards The Hill and Harrow Town Centre. It identifies Harrow's trademark landmark of St Mary's on Harrow on The Hill.	Courtenay Avenue/Harrow View (bridge over railway) should be a protected view.	The Harrow Views Assessment assessed this view in accordance with the LVMF and finds that it does not merit protection. No change.
9	Pages 26/27	The glimpsed view of central London behind Harrow Hill is indeed an important view. The panorama of the church, The Hill and its shoulders set in the plain of Harrow is a very important uninterrupted view, quite rare in London. It must be protected.	The view from Old Redding is important and must be protected.	The Harrow Views Assessment assessed this view in accordance with the LVMF and finds that it should continue to be protected. No change.
9	Pages 40/41	The Harrow Weald ridge above the skyline of Harrow Town Centre is an important continuous view. The height of the existing buildings respect that relationship and there is no reason for any higher buildings in Harrow Town Centre to interrupt that relationship.	The view of Harrow Weald Ridge from The Grove is important and its continuity should not be broken by tall buildings.	The Harrow Views Assessment is an evidence base document. The question of tall buildings, informed by the Views Assessment, is a matter for the AAP itself and is addressed in the pre-submission document by Policy AAP 6. Policy 3 of the Development Management Policies DPD gives effect to the Assessment for considering the impact of development proposals on views. No change.
9	Pages 54/55	The planning application for Wood Farm is within time and will be shortly implemented. This should be a protected view now and should impact on any future and as yet unapproved planning applications.	The view from Wood Farm should be protected with immediate	The LVMF requires viewing places to be 'open, publicly accessible and allow for pause and enjoyment of the view'. Until the approved or any alternative scheme securing public access at Wood Farm is implemented, the protection of the view from Wood Farm would not meet

			effect.	these requirements of the LVMF. However the Wood Farm view is included in the schedule of views in the pre-submission Development Management Policies DPD recognising the expectation that the country park extension will be realised during the plan period. No change.
9	Pages 62/63	The point made in relating to page 6 should be reflected in these diagrams. There should also be larger plans showing how these impact on the Intensification Area and Harrow Town Centre in particular.	The diagrams should show multiple viewing points. There should be larger plans in relation to the IA and Harrow town centre.	As per page 6 comments above. All of the views recommended for protection in the Harrow Views Assessment have been made available to the Council in GIS format and will appear as a layer on the interactive policies map (formerly known as the proposals map).
9	Page 68	See comments on page 6. The yellow sections should be widened slightly to identify the plain around the shoulders and the summit of The Hill.	The yellow zone in the view from Old Redding should be widened.	In response to this representation the yellow wider setting consultation area from the Old Redding viewpoint has been reconsidered and extended slightly in the final Views Assessment report.
9	Pages 70/71	See comments in page 6. Nothing in the yellow zone should be higher than the datum created by the existing tallest structures in Harrow Town Centre. This will preserve the concept identified in my comments on pages 40 and 41 and the guidance identified on pages 70 and 71.	To preserve the continuity of Harrow Weald Ridge from The Grove development should not be any higher than existing tall buildings in Harrow town centre.	The Harrow Views Assessment is an evidence base document. The question of tall buildings, informed by the Views Assessment, is a matter for the AAP itself and is addressed in the pre-submission document by Policy AAP 6. Policy 3 of the Development Management Policies DPD gives effect to the Assessment for considering the impact of development proposals on views. No change.
9	Pages 82/83	I totally agree.	Agree with proposed protected view from Wood Farm.	Noted.
57	General	The London View Management Framework (LVMF) is	The	

		<p>identified on page 2 as a key document linked to the regional plan via policy 7.11, the principles of which could apply to other London Boroughs. Selected extracts of the LVMF are then quoted with regard to the selection of viewing places. Page 10 sets out the methodology, confirming that the suitability of views largely derive from the LVMF criteria. However, there is one important aspect of the LVMF that has not been quoted or referred to. The LVMF makes it clear on page 1 that "viewing places need to be a place in its own right allowing for pause and enjoyment of the view". This point is not considered within the proposed document and is most relevant to section 8 of the report, where views from the car park roof of St Ann's are identified - these views would not meet this test.</p>	<p>Assessment does not consider the LVMF criterion requiring viewing places to be a place in their own right for pause and enjoyment of the view.</p> <p>Especially concerned with St. Ann's shopping centre rooftop car park (section 8).</p>	<p>The visual management guidance at section 5 of the LVMF refers to viewing places (in relation to the assessment of development impacts) as providing viewers with '...a high level of amenity. They should be open, publicly accessible and allow for pause and enjoyment of the view'. These are addressed in the methodology of the Harrow Views Assessment, requiring qualifying viewing places to be publicly accessible and well used, and taking into account the expectations or occupation of the viewer. No change.</p> <p>The picture of St. Ann's Shopping Centre rooftop is provided to illustrate the potential views that may be achieved from tall buildings in Harrow. The preceding paragraph on page 90 of the report explains this.</p>
57	General	<p>The document should consider, and be influenced by, decisions made relating to visual impact in the local area by the Secretary of State, in particular the appeal decision relating to 51 College Road, dated 1st June 2010. The proposed document has significantly different judgments on a number of viewpoints and development height restrictions than those provided by the SoS in appeal decisions. The outcome of the appeal decision referred to above will be known by the author of the proposed document as they (SLR) gave evidence at this appeal, with the Inspector finding against their evidence on a number of visual impact matters that have now been resurrected in conflict with the SoS decision.</p>	<p>The Assessment should be informed by and not conflict with the Secretary of State's decision relating to 51 College Road.</p>	<p>In accordance with London Plan Policy 7.12 and LVMF the Assessment provides a basis for managing development so that the ability to see St. Mary's Church and its surrounding environment is preserved, and provides threshold heights to this end in accordance with the published methodology. It is accepted that the principle of a tall building at 51 College Road has been established (see para. 5.15 of the Core Strategy). In all views except that proposed from Wood Farm (once it becomes publicly accessible) the College Road site is within the wider setting consultation area and would therefore be covered by Policy 3(B)(b) & (E) of the pre-submission Development Management Policies DPD. It should also be noted the Views Assessment has deleted a number of the protected views included in the Harrow UDP, where these do not fulfil the LVMF criteria, whilst new ones (such as The Grove open space) have been included where these are assessed as fulfilling the LVMF criteria, in consultation with residents. No change.</p>
57	General	<p>This study identifies the key landmark in the area is St Mary's</p>	<p>The</p>	<p>In accordance with London Plan Policy 7.12 and LVMF the</p>

		Church, a position that is without doubt. However, the study goes on to regard the whole of Harrow in the Hill (and occasionally beyond– see protected view 17) to be protected as ‘Wider Setting Consultation Areas’ (WSCA) that are initially suggested to have the same level of protection as the Landmark Viewing Corridor (LVC) (page 9). The report goes on, at page 89 item E (b), to suggest that development within the WSCA has a lesser degree of protection than the LVC. It’s recognised that this approach is influenced by the LVMF, however the protection of the wider hill is quite different to the UDP policy, which aimed to protect views of St Mary’s Church. Again, this change does need to be considered and justified alongside recent SoS decisions.	Assessment extends protection beyond St. Mary’s Church to the whole of Harrow Hill, which is different to UDP Policy and the Secretary of State’s decision relating to 51 College Road.	Assessment provides a basis for managing development so that the ability to see St. Mary’s Church and its surrounding environment is preserved. The Assessment need not be bound by existing development plan policy. No change.
57	General	I now comment on a number of proposed protected viewpoints with reference to the appeal decisions referred to above where relevant. A repeated point for all of the proposed protected viewpoints is that they make judgments that limit the height of future development without explaining how these judgments have been arrived at. Importantly, the exact location of the viewpoint, the exact height of restriction and how these relate to what was previously considered to be acceptable through previous appeal decisions are not provided. Without this information there is not an exact test for development or an approach consistent with SoS decisions and relevant case law. In many cases, the proposed height restrictions directly contradict reasoned justification behind the SoS’s appeal decisions.	The location of viewpoints and height restrictions is not specified, so there is no exact test for development. No information is provided on how the viewpoints relate to the Secretary of State’s decision relating to 51 College Road – in many cases they contradict it.	In response to this representation the final Harrow Views Assessment report includes grid references for each view point and threshold heights for development. The purpose of the Harrow Views Assessment report is to objectively assess existing UDP views and proposed new views against LVFM criteria – an approach that was agreed during the Core Strategy examination in public. No change.
57	Pages 64/65	Proposed Protected Viewpoint 1 (Harrow Recreation Ground) This viewpoint identifies a height for development, however it	The conclusions of the Travis	In accordance with London Plan Policy 7.12 and LVMF the Assessment provides a basis for managing development so that the ability to see St. Mary’s Church and its

		would appear that a permission for a 7-9 storey building has been granted on appeal (on the former Travis Perkins site) that would puncture the proposed restricted height level – this has not been considered or commented on in the document, but would clearly require amendment to reflect the conclusions of this appeal decision. Figure 1 contains the verified photomontage for this appeal scheme with an approximation of the height restriction imposed by the document.	Perkins appeal decision have not been commented upon; the approved scheme would puncture the proposed height limit from the Harrow Recreation Ground viewpoint.	surrounding environment is preserved, and provides threshold heights to this end in accordance with the published methodology. The Neptune Point development was allowed on appeal, having regard to the development plan in force at the time, and construction is now underway. However, in response to this representation, the photograph from Harrow Recreation Ground has been updated in the report to show the Neptune Point development.
57	Pages 66/67	Proposed Protected Viewpoint 7 (Harrow View) This viewpoint identifies a height restriction for development that is lower and more extensive than the proposed development in viewpoints referred to by the Inspector in the 51 College Road appeal, where the prominence of the spire is considered to be the key test, rather than the protection of the hill. The Inspector/SoS, in considering Harrow Council's evidence, made it clear that it is important not to “conflate visibility and harm” (para 160), this document must address this position. Figure 2 contains a verified photomontage for this appeal scheme from a different location, but one that the SoS considered a tall building in the immediate context of St Mary's Church and Harrow on the Hill. The equivalent height restriction proposed is approximated in this view.	The proposed height limit is lower and more extensive than that considered by the Secretary of State relating to 51 College Road The Assessment must separate out visibility and harm.	In accordance with London Plan Policy 7.12 and LVMF the Assessment provides a basis for managing development so that the ability to see St. Mary's Church and its surrounding environment is preserved, and provides threshold heights to this end in accordance with the published methodology. It is accepted that the principle of a tall building at 51 College Road has been established (see para. 5.15 of the Core Strategy) but this should not frustrate objective assessment intended to inform the preparation of new development plan documents within the framework provided by up to date London Plan and national policies. It is noted that this view cone does not affect the 51 College Road site. No change. London Plan Policy 7.12 states that townscape and linear views must be managed to ensure that the ability to see buildings in conjunction with the surrounding environment is preserved, and that developments exceeding threshold heights in landmark viewing corridors should be refused. No change.
57	Pages 68/69	Proposed Protected Viewpoint 8 (Old Redding) This viewpoint again identifies a height restriction for development that is lower and more extensive than viewpoints referred to by the Inspector in the College Road appeal. The height of development the Inspector (and SoS) accepted at	The proposed height limit is lower and more extensive than that considered	In accordance with London Plan Policy 7.12 and LVMF the Assessment provides a basis for managing development so that the ability to see St. Mary's Church and its surrounding environment is preserved, and provides threshold heights to this end in accordance with the

		<p>this appeal would now not be acceptable due to the unjustified height restriction suggested. This is a fundamental conflict, the SoS arrived at the decision to accept the height of the proposal; for 51 College Road through a series of verified photomontages, now restrictions are imposed that conflict with this decision, seemingly without a transparent process of judging the acceptable height. A logical conclusion would be to treat the SoS's decision as forming an important evidence base for such a judgment.</p>	<p>by the Secretary of State relating to 51 College Road</p> <p>This is a fundamental conflict with the secretary of State's decision without a transparent process for judging the acceptable height</p>	<p>published methodology. It is accepted that the principle of a tall building at 51 College Road has been established (see para. 5.15 of the Core Strategy) but this should not frustrate objective assessment intended to inform the preparation of new development plan documents within the framework provided by up to date London Plan and national policies. It is noted that the College Road site is within the wider setting consultation area of this view cone and would therefore be covered by Policy 3(B)(b) & (E) of the pre-submission Development Management Policies DPD. No change.</p> <p>The draft Views Assessment was been prepared in consultation with third parties and made available as part of the preferred option Area Action Plan consultation in January/February 2012, from which the respondent's comments derive. The final Assessment is available as part of the pre-submission consultation and may be subject to scrutiny during the subsequent examination in public. No change.</p>
57	Pages 70/71	<p>Proposed Protected Viewpoint 15 (Grove Open Space) The document imposes a height restriction that appears to be at or slightly below the height of the existing buildings, and states on page 71 that this should not be exceeded. The appeal decision for 51 College Road came to a very different view, and at paragraphs 168 and 169 concluded that buildings puncturing the horizon line would be acceptable as it was "self evident that the ridge ran continuously behind the buildings". Again, it is unclear why the author's judgment of the proposed restriction is so different to that put forward by the Inspector and SoS. Figure 4 repeats the verified photomontage the SoS considered acceptable, with the proposed height restriction approximated. It is recognised that the verified montage is taken at a lower height than the Proposed Protected Viewpoint 15.</p>	<p>The proposed height limit is lower than the height of the proposal considered acceptable by the Secretary of State in respect of 51 College Road.</p>	<p>In accordance with London Plan Policy 7.12 and LVMF the Assessment provides a basis for managing development so that the ability to see Harrow Weald Ridge and in its context is preserved, and provides a threshold height to this end in accordance with the published methodology. It is accepted that the principle of a tall building at 51 College Road has been established (see para. 5.15 of the Core Strategy) but this should not frustrate objective assessment intended to inform the preparation of new development plan documents within the framework provided by up to date London Plan and national policies. It is noted that the College Road site is within the wider setting consultation area of this view cone and would therefore be covered by Policy 3(B)(b) & (E) of the pre-submission Development Management Policies DPD. No change.</p>

			It is not clear why the Assessment comes to a different judgement than the Secretary of State.	The Secretary of State was making a determination on a specific proposal relating to 51 College Road, on the basis of the development plan in force at the time, and his site specific findings may be a material consideration for any future proposal on the site. The Assessment has been carried out in accordance with London Plan Policy 7.12 and LVMF to inform the preparation of new development plan documents. No change.
57	Pages 44/45	Proposed Protected Viewpoint 17 (Capital Ring) Similarly, the suggested height restriction for this viewpoint is fundamentally different to the judgment of the Planning Inspector and SoS for the 51 College Road Appeal. Paragraph 170 of the appeal decision makes it clear that town centre buildings would be viewed separately to St Mary's Church and that development well above the restriction proposed now, would be acceptable. Figure 5 repeats the verified photomontage prepared by the author of the views assessment document at the 51 College Road inquiry from a similar position to the currently proposed protected viewpoint 17. This approximates the proposed height restriction, but shows that the proposed height contradicts the Inspector and SoS's decision (para 170) that "well-designed buildings on the appeal site would challenge or distract from the prominence of the spire" as the 51 College Road proposals would extend well above the currently proposed height limits.	The proposed height limit is lower than the height of the proposal considered acceptable by the Secretary of State in respect of 51 College Road.	In accordance with London Plan Policy 7.12 and LVMF SPG the Assessment provides a basis for managing development so that the ability to see St. Mary's Church and its surrounding environment is preserved, and provides threshold heights to this end in accordance with the published methodology. It is accepted that the principle of a tall building at 51 College Road has been established (see para. 5.15 of the Core Strategy) but this should not frustrate objective assessment intended to inform the preparation of new development plan documents within the framework provided by up to date London Plan and national policies. It is noted that the College Road site is within the wider setting consultation area of this view cone and would therefore be covered by Policy 3(B)(b) & (E) of the pre-submission Development Management Policies DPD. No change.
57	Page 89	In respect of the suggested planning policies at page 89 of the document, we believe significant further work is required to consider the proposed height restrictions and re-calibrate these to reflect recent SoS decisions whilst providing quantifiable information to clearly identify what the restriction actually means.	The suggested planning policy should be revised to consider the Secretary of State's decisions and improve clarity about what the height restrictions mean.	Policy 3 of the pre-submission Development Management Policies DPD has been developed in the context of the London Plan, the LVMF and to reflect the objectively assessed findings of the Harrow Views Assessment. However, in response to this representation, the policy has been revised to make reference to the threshold heights of landmark viewing corridors.
57	Page 90/91	In respect of the further recommendations identified at page 90, we don't consider St Ann's car park to pass the tests of a "Viewing Place". We would also suggest that the aspiration for	St. Ann's car park does not pass the tests	The car park is not proposed as a viewpoint, but is simply shown to illustrate that views enjoyed at upper levels of taller development within Harrow town centre as explained

		visual linkages between Harrow and St Mary's Church must be considered alongside (and not above) other urban design influences.	for a viewing place The aspiration for new visual linkages must be considered alongside other design considerations	in the preceding text on page 90 of the report. No change. The Council's position regarding new visual linkages between Harrow town centre and Harrow on the Hill are set out in the Core Strategy; the assessment merely cross references this established aspiration. No change.
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