

# Development Management Policies Statement of Representations (Pre-Submission)

## 1. Introduction

1.1 Consultation on the Development Management Policies DPD Pre-Submission consultation document took place between 27<sup>th</sup> July and 7<sup>th</sup> September 2012. Consultation was undertaken in accordance with the Council's Statement of Community Involvement and in line with regulations of the Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations require the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken on the Development Management Policies DPD at the Pre-Submission stage, a summary of the main issues raised in response to that consultation, and to detail the Council's response to comments made.

## 2. Summary of consultation undertaken on the Development Management Policies Pre-Submission consultation document

- 2.1 On 20<sup>th</sup> June 2012, Harrow's Cabinet considered a report on the Development Management Policies DPD (see <http://www.harrow.gov.uk/www2/documents/g61243/Public%20reports%20pack,%20Wednesday%2020-Jun-2012%2019.30,%20Cabinet.pdf?T=10>). At that meeting Cabinet recommended the DPD be referred to Full Council for approval for consultation.
- 2.2 On 5<sup>th</sup> July 2012, Full Council endorsed the Development Management Policies Pre-Submission consultation document and resolved to publish the document for consultation for a period of six weeks and, following consultation, submission to the Secretary of State for independent examination in public (see <http://www.harrow.gov.uk/www2/documents/g61086/Public%20reports%20pack,%20Thursday%2005-Jul-2012%2019.30,%20Council.pdf?T=10>).
- 2.3 Formal notification of the Development Management Policies Pre-Submission publication was given on 27<sup>th</sup> July 2012, and representations were invited for a six week period ending 7<sup>th</sup> September 2012. Representations were also invited on the Sustainability Appraisal during this period.
- 2.4 A formal notice setting out the proposals matters and representations procedure was placed in the 'Harrow Observer' newspaper on both the 26<sup>th</sup> July and 2<sup>nd</sup> August 2012 (see **Appendix A**). In addition, on 26<sup>th</sup> July 2012 a total of 1,048 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**). 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 E**) were sent a letter by post (see **Appendix F**) in July 2012. Unless otherwise requested by the consultation body, enclosed with the letter was a hard copy of the Development Management Policies DPD Pre-Submission document, the Statement of the Representations Procedure, and the Sustainability Appraisal Report. In accordance with Regulation 21 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a separate letter was also sent to the Mayor of London requesting his opinion on the conformity of the DPD with the London Plan 2011 (see **Appendix G**).
- 2.5 Hard copies of the Development Management Policies DPD Pre-Submission consultation document, the Sustainability Appraisal Report, the Statement of the Representations Procedure and the response form (see **Appendix H**) were made available at the Harrow Civic Centre (Access Harrow) and all public libraries across the Borough. Additional copies of the DPD Pre-Submission consultation 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.

- 2.6 A week prior to the close of consultation a reminder e-mail and letter were sent out to those on the LDF consultation database to remind consultees of the closing date for making their comments.

### **3. Duty to Cooperate**

- 3.1 Section 110 of the Localism Act inserts section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A imposes a duty on a local planning authority to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed.
- 3.2 The other persons prescribed are those identified in regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The bodies prescribed under section 33A(1)(c) are:
- (a) the Environment Agency;
  - (b) the Historic Buildings and Monuments Commission for England (known as English Heritage);
  - (c) Natural England;
  - (d) the Mayor of London;
  - (e) the Civil Aviation Authority;
  - (f) the Homes and Communities Agency;
  - (g) each Primary Care Trust
  - (h) the Office of Rail Regulation;
  - (i) Transport for London;
  - (j) each Integrated Transport Authority;
  - (k) each highway authority and
  - (l) the Marine Management Organisation.
- 3.3 The duty imposed to co-operate requires each person, including a local planning authority, to:
- (a) engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and
  - (b) have regard to activities of the persons or bodies (above) so far as they are relevant to activities within subsection (3).
- 3.4 The relevant activities listed under subsection (3) comprises the preparation of development plan documents/local development documents, and activities which prepare the way for and which support the preparation of development plan documents, so far as relating to a strategic matter.
- 3.5 The Council has and continues to engage constructively with other local planning authorities and other public bodies on the preparation of the DPD, following the approach set out in the NPPF. The mechanisms for and evidence of cooperation and engagement is set out below.

## Duty to Cooperate – Engagement Undertaken

Cross Boundary Consultee	How we Cooperated	Outcomes
Neighbouring authorities (see map 1)	<p>Letters sent inviting representations on the DPD at both stages of preparation and responses received. (See Consultation Statement above)</p> <p>West London Alliance (planning officers group from 6 West London Borough's). Group memorandum of understanding.</p> <p>London – Luton Corridor Forum</p> <p>Planning Officer meetings with Hertsmere</p> <p>Planning Officer Meetings with Three Rivers</p>	<p>Details of representations received and the Council's actions as a result are detailed above No major cross boundary issues identified.</p> <p>Updates given by respective Borough's on Local Plan progress and any cross boundary issues raised. Memorandum of Understanding signed to give effect to cross boundary cooperation.</p> <p>Meetings to progress the London – Luton growth corridor which will result in a joined up approach to managing and attracting growth in this area. No major cross boundary issues identified arising from this DPD.</p> <p>Meetings last held in June / July 2012 and are scheduled for every quarter.</p>
Environment Agency	<p>Letters inviting representations on the DPD and responses received. (See Consultation Statement below)</p> <p>Meetings at Council offices (5 in total)</p>	<p>Details of representations received and the Council's actions as a result are detailed above. Issues raised regarding policies dealing with flood risk and management, and river corridors (see above for details)</p> <p>Meetings centred around the Level 1 and Level 2 SFRA extents. Advice given on the wording of flooding policy and the use of SUDS.</p> <p>Resolved to remove 3b designation from previously developed sites.</p> <p>EA provide flood mapping for the Borough.</p>
English heritage	Letters inviting representations on all Development Plan Documents and responses received.	Details of representations received and the Council's actions as a result are detailed above.

	<p>(See Consultation Statements for each DPD)</p> <p>Written communications between the Council and English heritage</p> <p>Draft copies of heritage policies sent before formal consultation</p>	<p>Advice on Heritage and Conservation policies given</p> <p>Heritage policies amended in light of specialist advice</p>
Natural England	<p>Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)</p> <p>Written communications between the Council and Natural England</p>	<p>Details of representations received and the Council's actions as a result are detailed above.</p> <p>Advice on biodiversity policies given</p>
Civil Aviation Authority	<p>Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)</p>	<p>Details of representations received and the Council's actions as a result are detailed above. No major issues raised.</p>
Greater London Authority	<p>Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)</p> <p>Officer from the GLA on secondment to the Local Plan Team</p> <p>GLA Housing Study meetings and work</p> <p>Liason with specialist officers for policy development regarding affordable housing and sustainability</p> <p>London Wide Green Grid project</p>	<p>Details of representations received and the Council's actions as a result are detailed above.</p> <p>Officer providing advice on policy development to ensure there are no conflicts with the strategic London Plan</p> <p>Participation in the London wide SHLAA and SHMA evidence base studies.</p> <p>Discussions held and advice sent to ensure consistency with the London Plan.</p> <p>Meetings and joint working undertaken to establish a Harrow Green Grid as part of the wider London Green Grid.</p>
Primary Care Trust	<p>Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)</p>	<p>Details of representations received and the Council's actions as a result are detailed above.</p>

	Infrastructure Delivery meetings and correspondence	Consulted on evidence base documents, and provided information to inform future service delivery
Highways Agency (TFL)	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)  Liason with TFL regarding transport study modelling and findings  Infrastructure Delivery meetings and correspondence	Details of representations received and the Council's actions as a result are detailed above.  Agreed the methodology for modelling certain junctions, and the results of the findings of the study, using TFL data.  Consulted on evidence base documents, and provided information to inform future infrastructure provision
Network Rail	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)	Details of representations received and the Council's actions as a result are detailed above. No major issues raised.

#### 4. Who responded and number of representations received

- 4.1 There were 23 representations received to the Development Management Policies DPD Pre-Submission consultation. These came from statutory or neighbouring local planning authorities (6), developers and agents (9), amenity and interest groups (6), and residents (2). **Appendix I** provides a full list of the respondents. In total, 134 individual comments were made that were considered and responded to by the Council (see **Appendix J**).

#### 5. Summary of the main issues/comments raised to the Development Management Policies DPD Pre-Submission consultation

- 5.1 The following section of the report summarises the main issues raised through Pre-Submission consultation on the Development Management Policies DPD and outlines the Council's proposed response to these and the changes made to the document.

##### Policy 1: Achieving a High Standard of Development

There were a number of comments made in relation to wording / typographical errors, and English heritage sought some additional wording, which is dealt with in the heritage policies.

##### Policy 2: Achieving Lifetime Neighbourhoods

There was general support for this policy, but some concern about the application of lifetime homes standards, and so minor changes have been made to the text to clarify on this.

Policy 3: Protected Views and Vistas

There was support for this policy, but also objections to the evidence base study that underpins it; however none of these were felt to necessitate any changes.

Policy 4: Shopfronts and Signs

No comments

Policy 5: Advertisements

No comments

Policy 6: Areas of Special Character

No comments

Policy 7: Heritage Assets

No issues of soundness or legal compliance raised.

Policy 8: Enabling Development

No comments

Policy 9: Conservation Areas

Only English heritage responded to this policy, with suggestions as to where the text could be strengthened.

Policy 10: Listed Buildings

No comments

Policy 11: Locally Listed Buildings

It was pointed out that part of the policy was not legally compliant by affording locally listed buildings the same protection as listed buildings, by requiring their reconstruction if demolished. In response, this section of the policy has been deleted.

Policy 12: Scheduled Ancient Monuments

No comments

Policy 13: Archaeology

No comments

Policy 14: Nationally Registered Historic Parks and Gardens

No comments

Policy 15: Locally Listed Parks and Gardens

No comments

Policy 16: Managing Flood Risk

There was some concern with regards to developing land that is at risk of flooding from residents; however the policy was supported by the Environment Agency.

Policy 17: On Site Water Management and Surface Water Attenuation

There was support for this policy, but also some clarity requested, which has resulted in a minor textual change to the policy with regards to minor development and SUD requirements.

Policy 18: Protection and Enhancement of River Corridors and Watercourses

This policy was supported by the Environment Agency.

Policy 19: Sustainable Design and Layout

No comments

Policy 20: Decentralised Energy Systems

No issues of soundness or legal compliance raised. Minor textual changes were proposed by the GLA and accepted for clarity on the type of development required to connect to decentralised energy networks.

Policy 21: Renewable Energy Technology

No issues of soundness or legal compliance raised. Minor textual changes were proposed by the GLA and accepted for clarity on the type of development where renewable energy should be sought

Policy 22: Prevention and Remediation of Contaminated Land

This policy was supported by the Environment Agency.

Policy 23: Redevelopment of previously-developed sites within Green Belt and Metropolitan Open Land

There was concern that this policy would not adequately protect the Green belt from some Amenity groups, but support was also given to it by the GLA. No changes are proposed as the Council considers the policy to conform with the NPPF

Policy 24: Beneficial Use of the Green Belt and Metropolitan Open Land

There was support for this policy, but an Amenity Group felt that Biodiversity wasn't fully recognised, and so a minor addition of wording has been proposed to rectify this.

Policy 25: Protection of Open Space

Amendments have been proposed to the opening text and reasoned justification to clarify Harrow's position with regards to open space protection in regards to concerns about clarity. There was also concerns that the policy did not offer enough protection and was not NPPF compliant which the Council disagrees with, and so no changes have been made to the policy. There were a number of comments regarding a recent planning application that allowed the loss of open space.

Policy 26: Provision of New Open Space

This policy was supported, but a minor typographical change has been proposed for referencing accuracy.

Policy 27: Protection of Biodiversity and Access to Nature

This policy was fully supported, however a minor modification has been proposed to the policy to ensure mitigation measures are sought, which was an omission.

Policy 28: Enhancement of Biodiversity and Access to Nature

This policy was supported.

Policy 29: Pinner Chalk Mines

This policy was supported, a minor typographical change has been proposed for referencing accuracy.

Policy 30: Trees

There was support for the policy, but also concern that it was too restrictive in not allowing for the loss of TPO protected trees where the wider benefits of the development made this necessary. The Council agreed with this, and so a minor change to the policy has been proposed to clarify this.

Policy 31 Streetside Greenness and Forecourt Greenery

This policy is supported.

Policy 32: Housing Mix

No issues of soundness or legal compliance raised

Policy 33: Office Conversions

There was support for this policy, but also an objection to the requirement for dual aspect development. No changes have been proposed as the Council seeks the highest design standards, and feels the policy has sufficient flexibility built in. There was also concern about lifetime homes requirements, but this has been established in the London Plan and Harrow's Core Strategy.

Policy 34: Residential Conversions

There was concern that the policy wasn't clear enough on how it would be implemented. The Council feels that the reasoned justification is adequate and explains this.

Policy 35: Amenity Space

No comments

Policy 36: Protection of Housing

No comments

Policy 37: Play Facilities

There was support for this policy, but concerns that it did not require play facilities where there was no chance of on-site provision. Minor changes have therefore been proposed to clarify requirements.



Policy 38: Sheltered Housing, Care Homes and Extra Care Housing

No issues of soundness or legal compliance raised

Policy 39: Large Houses in Multiple Occupation, Hostels and Secure Accommodation

No issues of soundness or legal compliance raised

Policy 40: Supporting Economic Activity and Development

A minor typographical error has been proposed for rectifying. There was also concern that the sequential approach laid out would stop available sites from coming forward and was therefore not NPPF compliant. The Council disagrees and thinks that the sequential approach as set out is fully justified.

Policy 41: Town Centre Offices and Northolt Road Business Use Area

Clarity was requested of the policy with regards to locations that it applied to. Changes have been proposed to rectify this.

Policy 42: Managing Economic Activities and Development

No comments

Policy 43: Working at Home

No comments

Policy 44: Hotel and Tourism Development

This policy was supported.

Policy 45: Loss of Public Houses

There was concern that the marketing period specified in the text (2 years) was too onerous. The Council agrees and has proposed to amend it to 12 months in line with the objector's comments.

Policy 46: New Town Centre Development

It was proposed that the policy be more flexible, and entertain out of centre sites for retailing purposes. The Council disagrees and no changes are proposed as a result of this. There was also an objection to the setting of a figure (400sqm), below which a sequential assessment would not be required. In response the Council has proposed to modify the policy to limit the area where no sequential assessment will be needed to existing centres and neighbourhood parades, and reduce the threshold to 100sqm. A locally set Impact Assessment threshold was also requested, however no evidence was submitted to support this, and the Council has no evidence to suggest that this is necessary, and so no changes are proposed.

Policy 47: Primary Shopping Frontages

This policy was supported.

Policy 48: Secondary and Designated Shopping Frontages

This policy was supported, but there was a query with regards to the evidence for the percentage stated for designated frontages in non retail use. No changes are proposed.

Policy 49: Other Town Centre Frontages and Neighbourhood Parades

This policy was supported.

Policy 50: Vacant Shops in Town Centres and Neighbourhood Parades

This policy was supported – there was a suggestion that empty shops could be replaced with flats or car parking. The Council disagrees with this approach and no changes are proposed.

Policy 51 Mixed-Use Development in Town Centres

This policy was supported.

Policy 52: Evening Economy

This policy was supported

Policy 53: Parking Standards

This policy was supported, a minor wording changes has been proposed to reflect the Council's encouragement of Car clubs.

Policy 54: Transport Assessments and Travel Plans

One respondent wanted travel plans to be scrutinised by a third party, the Council noted that they are made available on the Council's website and so no changes are proposed.

Policy 55: Servicing

To address an omission pointed out by the GLA, the Council propose to add text to the reasoned justification stating the requirement for logistics, delivery and servicing plans where necessary.

Policy 56: Waste management

Minor changes are proposed to the policy and text to avoid misinterpretation, and to reference London plan policies.

Policy 57: New Community, Sport and Education Facilities

No comments

Policy 58: Retention of Existing Community, Sport and Education Facilities

This policy was supported.

Policy 59: Enhancing Outdoor Sport

No issues of soundness or legal compliance raised

Policy 60: Telecommunications

No issues of soundness or legal compliance raised

Policy 61: Planning Obligations

No issues of soundness or legal compliance raised

Schedule 4; Harrow Protected Views

Minor changes are proposed to add in missing information to the protected views listed, including Camera positions.

Appendix A – Notice placed in the ‘Harrow Observer’ newspaper on both the 26<sup>th</sup> July and 2<sup>nd</sup> August 2012

is available from the Traffic Commissioner's Office.

**JPC LAW**  
Omni House 252 Belsize Road  
London NW6 4BT  
T354724

**Public Notice**

**PLANNING AND COMPULSORY PURCHASE ACT 2004  
THE TOWN AND COUNTRY PLANNING (LOCAL  
PLANNING) (ENGLAND) REGULATIONS 2012  
NOTICE OF PUBLICATION OF DEVELOPMENT PLAN  
DOCUMENTS (REGULATION 19)  
HARROW LOCAL DEVELOPMENT FRAMEWORK (LDF)  
HARROW & WEALDSTONE AREA ACTION PLAN DPD  
(PRE-SUBMISSION)  
DEVELOPMENT MANAGEMENT POLICIES DPD  
(PRE-SUBMISSION)  
SITE ALLOCATIONS DPD (PRE-SUBMISSION)**

Harrow Council has prepared the proposed submission version of the above Development Plan Documents (DPDs). All of the documents give effect to the spatial strategy and strategic policies of Harrow's Core Strategy, which was adopted 16th February 2012, and covers the period 2009 to 2026. The Area Action Plan contains specific planning policies and development sites that are relevant to the Harrow & Wealdstone Intensification Area (referred to as the 'Heart of Harrow'). The Development Management Policies DPD contains the general planning policies for the Borough (some of which also apply in the Heart of Harrow area) and the Site Allocations DPD contains the development sites that are relevant to the rest of the Borough (excluding the Heart of Harrow area). The DPDs are accompanied by a Sustainability Appraisal, Habitats Assessment and an Equality Impact Assessment.

**Inspection of documents**  
The Council is inviting representations on the above DPDs and the accompanying documents. They are available for inspection from **Friday 27th July 2012 to Friday 7th September 2012:**

- at all Harrow Libraries (during normal opening hours)
- at the Civic Centre (Access Harrow – duty planner), Station Road, Harrow HA1 2XY
- via the Council's consultation website: <http://harrow-consult.objective.co.uk/portal>

For details of the address and opening times of your nearest library, or of the Civic Centre, please check the Council's website or contact the LDF Team via the e-mail address or telephone number given below.

**Representations procedure**  
The DPDs are being published in order for representations to be made prior to submission (i.e. 'Pre-Submission') to the Secretary of State for examination in public. Representations received during this Pre-Submission consultation will be considered alongside the submitted DPDs by an independent Planning Inspector. The purpose of the examination is to consider whether the DPDs comply with legal requirements and are 'sound' against tests of soundness prescribed by the Government in the National Planning Policy Framework (2012). To be 'sound' the DPDs must be positively prepared, justified, effective and consistent with national policy. The DPDs must also be in general conformity with the London Plan (2011). Representations may be accompanied by a request to be notified at a specific address about the submission of the DPDs to the Secretary of State for examination in public. All comments must be made on a 'representation' form which is available at the above venues and on the Council's website [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf). Representations must be received by **5pm on Friday 7th September 2012**. Representations may be made by any of the following means:

- Online: <http://harrow-consult.objective.co.uk/portal>
- Email: [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)
- By Post: LDF Team, Civic Centre 1, PO Box 57, Station Road, Harrow, HA1 2XF

**Further information:**  
For enquiries, email [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) or contact the LDF Team on Tel. 020 8736 6086 or at the address above.  
Dated 26th July 2012



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**Proposed:**  
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**Reason for:**  
**Reference:**  
**Location:**  
**Proposed:**  
BUILDING  
ALTER PR  
EAST END  
**Reason for:**  
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**Location:**  
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**BERWIN LEIG**

**NEW**

## Appendix B – Notification Letter sent to all Consultees on the Council's LDF Consultation Database

<p style="text-align: right;"></p> <p>Stuart Liddington Local Plans 3/12 Kite Wing Temple Quay House 2 The Square Bristol BS1 6PN</p> <p style="text-align: right;"><b>Place Shaping</b> Andrew Trehem Corporate Director</p> <p style="text-align: right;">23 July 2012</p> <p>Dear Sir / Madam,</p> <p><b>Harrow Local Plan – Pre-Submission Public Consultation 27<sup>th</sup> July – 7<sup>th</sup> September 2012</b></p> <p>Following the adoption of Harrow's Core Strategy in February 2012, the Council has been working to complete the other documents that will make up the Harrow Local Plan. These include:</p> <ul style="list-style-type: none"><li>• The Harrow and Wealdstone Area Action Plan;</li><li>• The Development Management Policies DPD; and</li><li>• The Site Allocations DPD.</li></ul> <p>The above documents were the subject of public consultation in May / June last year, and a further round of consultation was undertaken on the Area Action Plan in January / February of this year. I am writing to inform you that the above plans have now reached the Pre-Submission stage and will be published for their final round of public consultation from <b>27<sup>th</sup> July to 7<sup>th</sup> September 2012</b>.</p> <p>All of the documents are required to give effect to the spatial strategy and strategic policies set out in Harrow's Core Strategy. The Area Action Plan contains specific planning policies and development site allocations that are relevant to the Harrow &amp; Wealdstone Intensification Area (referred to as the 'Heart of Harrow'). The Development Management Policies DPD contains the general planning policies for the Borough (some of which also apply in the Heart of Harrow area) and the Site Allocations DPD contains the development sites that are relevant to the rest of the Borough (excluding the Heart of Harrow area). A Local Plan Policies Map has also been produced to graphically represent the planning designations and policies contained in the <u>DPDs</u>.</p> <p>The current version of the documents is the version that the Council intends to submit to the Secretary of State for independent examination. In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is inviting comments on the 'Pre-Submission <u>DPDs</u>' from the 27<sup>th</sup> July to the 7<sup>th</sup> September 2012.</p> <p>I am pleased to enclose a Statement of Representations Procedure, which provides details of how to comment on the <u>DPDs</u>, and where the documents have been made available to view. In summary, comments can be made:</p> <ul style="list-style-type: none"><li>• through the on-line consultation portal at: <a href="http://harrow-consult.limehouse.co.uk">http://harrow-consult.limehouse.co.uk</a>;</li><li>• by email at: <a href="mailto:ldf@harrow.gov.uk">ldf@harrow.gov.uk</a>; or</li><li>• by post to: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Station Road, Harrow, HA1 2UJ.</li></ul> <hr/> <p style="text-align: center;">Harrow Council, Planning Department, P O Box 37, Civic Centre, Station Road, Harrow, HA1 2UJ tel 020 8736 6069 email <a href="mailto:info@harrow.gov.uk">info@harrow.gov.uk</a> web <a href="http://www.harrow.gov.uk">www.harrow.gov.uk</a></p>	<p>Please note that, if you do not wish to use the on-line consultation portal, you may provide your comments using the representation response form, available both in hard copy and electronically. Guidance on how to fill in the representations form is provided in the Appendix of each of the <u>DPDs</u>. <b>Comments must be received by 5pm on Friday 7<sup>th</sup> September 2012.</b></p> <p>Comments may be made in support of aspects of the <u>DPDs</u>, as well as in objection. However, at this stage in the Plan's production your comments must be limited to the legal compliance and soundness of the DPD you are commenting upon. Details of what constitutes legal compliance and soundness can be found on our website, <a href="http://www.harrow.gov.uk/ldf">www.harrow.gov.uk/ldf</a>, in the appendices to each DPD, and in the notes accompanying the standard response form.</p> <p>The <u>DPDs</u>, Sustainability Appraisal and additional supporting evidence base, are available to view and download from the Council's website: <a href="http://www.harrow.gov.uk/ldf">www.harrow.gov.uk/ldf</a>. An interactive version of each DPD and Sustainability Appraisal is available via the Council's consultation portal: <a href="http://harrow-consult.limehouse.co.uk">http://harrow-consult.limehouse.co.uk</a>, which allows people to submit representations online. If you are a new portal user you will need to register first, and existing users will need to login with their username and password. Paper reference copies of the documents can be found at all Borough libraries and the Harrow Civic Centre (Access Harrow), and are available for short-term loan.</p> <p><b>Next stages</b></p> <p>Following the end of the consultation period, copies of all responses received will be forwarded to the Planning Inspectorate for consideration alongside the Submission <u>DPDs</u>, together with a Summary of Key Issues setting out the Council's response to points raised. In contrast to previous stages of consultation, the Council will not be making any further substantial changes to the documents prior to submitting them. However, a Schedule of Minor Post-Publication Changes (editing) for each DPD will be prepared and submitted to the Planning Inspectorate.</p> <p>The Council anticipates the Examination in Public will take place in December 2012 or January 2013. We will regularly update our website <a href="http://www.harrow.gov.uk/ldf">www.harrow.gov.uk/ldf</a> with information about this. If you would like to find out more about the Local Plan you can call the LDF Team on 020 8736 6082 or email us at <a href="mailto:ldf@harrow.gov.uk">ldf@harrow.gov.uk</a>.</p> <p>Yours faithfully,</p> <p style="text-align: center;"></p> <p><b>Matthew Paterson</b> LDF Team Leader Harrow Council</p>
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## Appendix C – List of contact on the Council’s LDF Consultation 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 Build 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
London Borough of Camden	Sport England (Greater London Region)	Assembly Member for Brent & Harrow & LDF Panel Member
Council for the Protection of Rural England(Harrow)	Watford Borough Council	Gareth Thomas MP for West Harrow
Council for British Archaeology	Watford Rural Parish Council	Bob Blackman MP for East Harrow
Mark Dowse (Crime Prevention)	Health & Safety Executive	Harrow Churches Housing Association
Vodafone LTD	Health Services Board	Circle Anglia
Transport for London	Nature Conservancy Council	Family Mosaic Housing
Transport for London Strategy Group	Network Rail	Chiltern Hundreds Charitable Housing Association Ltd
London Borough of Haringey	Great Minster House	Dimensions (UK) Limited
London Borough of Hillingdon	Group Property and Facilities	Jewish Community Housing Association
Brent & Harrow Chamber of Commerce	Property Services Agency	John Grooms Housing Association
BAA Aerodrome Safeguarding	Rail Freight Group	Home Group Limited

The Civic Trust  
Civil Aviation Authority Safety Regulation Group  
London Borough of Hounslow  
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

Road Haulage Association  
Iceni Projects  
GLA Biodiversity Group Strategy Directorate  
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

Genesis Housing Group (PCHA Maintenance)  
Pathmeads Housing Association Ltd  
Genesis Housing Group  
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

CGMS Consulting  
DP9 Town Planning Consultants  
MEPK Architects  
Metropolis PD  
Octavia Housing

Metropolitan Housing Trust Limited  
Notting Hill Housing Trust  
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

Dandara Ltd  
Saunders Architects LLP  
Savills  
Alsop Verrill  
Colliers CRE

CB Richard Ellis Ltd  
Berkeley Homes  
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 Crescent 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

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  
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 Charitable 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



Association

Kenmore Park Tenants and Residents Association	Nicola Close Residents Association	Royal Association in Aid of Deaf People
Kenton Area Residents Association	Orchard Court Residents Association	Royal National Institute For The Deaf
Honeybun Tenants Association	South West Stanmore Community Association	Kenton Lane Action Group
Sonia Court Residents Association	Princes Drive Resident Association	Kerry Court Residents Greensward Properties Ltd
Rowlands Avenue Residents Association	Priory Drive Residents Association	Grimsdyke Golf Club
Roxborough Park Residents Association	Sheridan Place Residents Association	Stanmore Chamber of Trade
Roxborough Residents Assoc.	Northwick Manor Residents' Association	Herts & Middx Wildlife Trust
Roxborough Road Residents Association	Nugents Park Res Association	Tempsford Court Management Company Ltd
Rusper Close Residents Association	Mount Park Residents Association	Wembley Rugby Club
Queensbury Circle Tenants Association	Harrow Hill Residents Association	English Golf Union
The Pinner Association	Hatch End Association	Harrow Heritage Trust
The Pynnales Close Residents Association	The Waxwell Close Association	St Mary's Church
Sudbury Court Residents Association	Hathaway Close Residents Association	Harrow High Street Association
Eastcote Village Residents Association	Abchurch Residents Association	Friends of Bentley Priory National Reserve
Rama Court Residents Association	Hazeldene Drive Tenants & Residents Association	Harrow in Leaf
Harrow Heritage Trust, Harrow Museum & Heritage Centre	Harrow Dental Centre	Kenton Bridge Medical Centre
The London Playing Fields Society	Abbey Dental Practice	Kenton Clinic
The National Trust West Middlesex Centre	B Cohen Dental Practice	Mollison Way Medical Centre
The Ramblers Association - North West London Group	Bridge Dental Practice	Pinner View Medical Centre
Harrow Natural History Society	Bright Dental Practice	Preston Road Surgery
Harrow Nature Conservation Forum	DentiCare	Primary Care Medical Centre
Harrow Partnership for Older People (P.O.P)	Dr K A Nathan Dental Practice	Roxbourne Medical Centre
Friends of the Earth - Harrow & Brent Group	Dr Tikam Dental Surgery	Savita Medical Centre (1)
Hatch End Cricket Club	Family Dental Care	Savita Medical Centre (2)
Estates Bursar Harrow School	G Bhuva & J Bhuva Dental Practice	Shaftesbury Medical Centre
Bursar, Harrow School	Harrow View Dental Surgery	St. Peter's Medical Centre
Orley Farm School	Harrow Weald Dental Practice	Stanmore Medical Centre
The Twentieth Century Society	M Ali Dental Practice	The Circle Practice
The Victorian Society	N Bahra Dental Practice	The Elmcroft Surgery
Harrow Association for Disability	S Aurora Dental Practice	The Enterprise Practice
Harrow Association of Voluntary Service	Village Surgery	The Harrow Access Unit
Harrow Athletics Club	Preston Medical Centre	The Medical Centre
Dove Park Management Co	Streatfield Surgery	The Northwick Surgery
West Harrow Action Committee	GP Direct Medical Centre	The Pinner Road Surgery

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  
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

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)  
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 Colllege  
Racal Acoustics Ltd  
Lloyds TSB  
The White Horse PH  
Curry Popeck Solicitors

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  
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

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  
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

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  
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

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  
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

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  
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

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  
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 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  
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 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  
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

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  
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 Mitual Shah  
Mr Sideras  
Mr Wright  
Mrs Ahmed  
Mrs Anastasia Marshall

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  
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

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  
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

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  
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

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 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

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 McCormack  
Mrs Kettles  
Mr Rulamaalam Asokan  
Mr Alexis  
Mr Raymond

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

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

## Appendix D – Statement of Representation Procedure

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**Statement of Representations Procedure for the:  
Harrow and Wealdstone Area Action Plan Proposed Submission (Regulation 19)  
Development Management Policies DPD Proposed Submission (Regulation 19)  
Site Allocations DPD Proposed Submission (Regulation 19)**

As part of the Local Plan, Harrow Council plans to submit three Local Development Document (the Harrow and Wealdstone Area Action Plan; the Development Management Policies DPD; and the Site Allocations DPD) to the Secretary of State of Communities and Local Government. The submission documents are being published for representations.

**Title of documents:**

Harrow and Wealdstone Area Action Plan: Pre-Submission Consultation  
Development Management Policies (DPD): Pre-Submission Consultation  
Site Allocations (DPD): Pre-Submission Consultation

**Subject matter:**

The above three Development Plan Documents have been prepared as part of Harrow's Local Development Framework. All of the documents give effect to the spatial strategy and strategic policies of Harrow's Core Strategy, which was adopted 16<sup>th</sup> February 2012, and covers the period 2009 to 2026.

The Harrow and Wealdstone Area Action Plan has been prepared jointly with the Greater London Authority (GLA). It contains specific planning policies and allocated site for development that are relevant to the Harrow & Wealdstone Intensification Area (referred to as the 'Heart of Harrow'), however, some policies of the Development Management Policies DPD will also be applicable. These are sign posted within the Area Action Plan. Once adopted, the policies and site allocations will supersede those contained in the Harrow Unitary Development Plan (2004).

The Development Management Policies DPD sets out criteria based policies that will be used to assess and determine planning applications for development outside of the Harrow and Wealdstone Intensification Area. Where identified in the Harrow and Wealdstone Area Action Plan, a number of policies contained within the Development Management Policies DPD will also be applicable to development within the Harrow and Wealdstone Intensification Area. Once adopted, the policies will supersede those contained in the Harrow Unitary Development Plan (2004).

The Site Allocations DPD 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 Proposed Policies Map (July 2012).

The Site Allocations DPD applies to that part of the Borough outside of the Intensification Area boundary. Development Management Policies DPD also applies to that part of the Borough outside of the Intensification Area boundary, unless specifically identified in the Harrow and Wealdstone Area Action Plan as being equally applicable to development within and without 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 27<sup>th</sup> July 2012 and ending on Friday 7<sup>th</sup> September 2012.**

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

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

- Council's website: [www.harrow.gov.uk](http://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
<b>Civic Centre Reference Library</b> Station Road, Harrow, HA1 2UU	Mon - Thurs 9.30 – 8.00 pm Fri 9.30 – 5.30 pm Sat 9.00 – 5.00 pm	<b>Pinner Library</b> Marsh Road, Pinner HA5 5NQ	Mon – 9.00 – 5.30pm Tues, Thurs 9.00 – 8.00pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
<b>Gayton Central Lending Library</b> 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	<b>Rayners Lane Library</b> 226 Imperial Drive, Rayners Lane, HA2 7HJ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
<b>Bob Lawrence Library</b> 6-8 North Parade, Mollison Way, Edgware, HA8 5QH	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	<b>Roxeth Library</b> Northolt Road, South Harrow, HA2 8EQ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
<b>Hatch End Library</b> Uxbridge Road, Hatch End HA5 4EA	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	<b>Stanmore Library</b> 8 Stanmore Hill, Stanmore, HA7 3BQ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
<b>Kenton Library</b> Kenton Lane, Kenton, HA3 8UJ	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm	<b>Wealdstone Library</b> The Wealdstone Centre, 38/40 High Street, Wealdstone, HA3 7AE	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm
<b>North Harrow Library</b> 429-433 Pinner Road, North Harrow, HA1 4NH	Mon – 9.00 – 5.30 pm Tues, Thurs 9.00 – 8.00 pm Weds Closed Fri 9.00 – 1.00 pm Sat 9.00 – 5.00 pm		

**Making a representation:**

The Council welcomes comments on the three DPDs. 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](mailto:ldf@harrow.gov.uk);
- by post to: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Harrow, HA1 2UU; 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 7<sup>th</sup> September 2012.**



For any further enquiries, please email [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) or contact the LDF Team on Tel. 020 8736 6068



## **Appendix E – 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 F – Notification Letter sent to Specific Consultation Bodies

<p style="text-align: right;"></p> <p>Stuart Liddington Local Plans 3/12 Kite Wing Temple Quay House 2 The Square Bristol BS1 6PN</p> <p style="text-align: right;">Place Shaping Andrew Treham Corporate Director</p> <p style="text-align: right;">23 July 2012</p> <p>Dear Sir / Madam,</p> <p><b>Harrow Local Plan – Pre-Submission Public Consultation 27<sup>th</sup> July – 7<sup>th</sup> September 2012</b></p> <p>Following the adoption of Harrow's Core Strategy in February 2012, the Council has been working to complete the other documents that will make up the Harrow Local Plan. These include:</p> <ul style="list-style-type: none"><li>• The Harrow and Wealdstone Area Action Plan;</li><li>• The Development Management Policies DPD; and</li><li>• The Site Allocations DPD.</li></ul> <p>The above documents were the subject of public consultation in May / June last year, and a further round of consultation was undertaken on the Area Action Plan in January / February of this year. I am writing to inform you that the above plans have now reached the Pre-Submission stage and will be published for their final round of public consultation from <b>27<sup>th</sup> July to 7<sup>th</sup> September 2012</b>.</p> <p>All of the documents are required to give effect to the spatial strategy and strategic policies set out in Harrow's Core Strategy. The Area Action Plan contains specific planning policies and development site allocations that are relevant to the Harrow &amp; Wealdstone Intensification Area (referred to as the 'Heart of Harrow'). The Development Management Policies DPD contains the general planning policies for the Borough (some of which also apply in the Heart of Harrow area) and the Site Allocations DPD contains the development sites that are relevant to the rest of the Borough (excluding the Heart of Harrow area). A Local Plan Policies Map has also been produced to graphically represent the planning designations and policies contained in the <u>DPDs</u>.</p> <p>The current version of the documents is the version that the Council intends to submit to the Secretary of State for independent examination. In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is inviting comments on the 'Pre-Submission <u>DPDs</u>' from the 27<sup>th</sup> July to the 7<sup>th</sup> September 2012.</p> <p>I am pleased to enclose a Statement of Representations Procedure, which provides details of how to comment on the <u>DPDs</u>, and where the documents have been made available to view. In summary, comments can be made:</p> <ul style="list-style-type: none"><li>• through the on-line consultation portal at: <a href="http://harrow-consult.limehouse.co.uk">http://harrow-consult.limehouse.co.uk</a>;</li><li>• by email at: <a href="mailto:ldf@harrow.gov.uk">ldf@harrow.gov.uk</a>; or</li><li>• by post to: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Station Road, Harrow, HA1 2UJ.</li></ul> <hr/> <p style="text-align: center;">Harrow Council, Planning Department, P O Box 37, Civic Centre, Station Road, Harrow, HA1 2UJ tel 020 8736 6069 email <a href="mailto:info@harrow.gov.uk">info@harrow.gov.uk</a> web <a href="http://www.harrow.gov.uk">www.harrow.gov.uk</a></p>	<p>Please note that, if you do not wish to use the on-line consultation portal, you may provide your comments using the representation response form, available both in hard copy and electronically. Guidance on how to fill in the representations form is provided in the Appendix of each of the <u>DPDs</u>. <b>Comments must be received by 5pm on Friday 7<sup>th</sup> September 2012.</b></p> <p>Comments may be made in support of aspects of the <u>DPDs</u>, as well as in objection. However, at this stage in the Plan's production your comments must be limited to the legal compliance and soundness of the DPD you are commenting upon. Details of what constitutes legal compliance and soundness can be found on our website, <a href="http://www.harrow.gov.uk/ldf">www.harrow.gov.uk/ldf</a>, in the appendices to each DPD, and in the notes accompanying the standard response form.</p> <p>The <u>DPDs</u>, Sustainability Appraisal and additional supporting evidence base, are available to view and download from the Council's website: <a href="http://www.harrow.gov.uk/ldf">www.harrow.gov.uk/ldf</a>. An interactive version of each DPD and Sustainability Appraisal is available via the Council's consultation portal: <a href="http://harrow-consult.limehouse.co.uk">http://harrow-consult.limehouse.co.uk</a>, which allows people to submit representations online. If you are a new portal user you will need to register first, and existing users will need to login with their username and password. Paper reference copies of the documents can be found at all Borough libraries and the Harrow Civic Centre (Access Harrow), and are available for short-term loan.</p> <p><b>Next stages</b></p> <p>Following the end of the consultation period, copies of all responses received will be forwarded to the Planning Inspectorate for consideration alongside the Submission <u>DPDs</u>, together with a Summary of Key Issues setting out the Council's response to points raised. In contrast to previous stages of consultation, the Council will not be making any further substantial changes to the documents prior to submitting them. However, a Schedule of Minor Post-Publication Changes (editing) for each DPD will be prepared and submitted to the Planning Inspectorate.</p> <p>The Council anticipates the Examination in Public will take place in December 2012 or January 2013. We will regularly update our website <a href="http://www.harrow.gov.uk/ldf">www.harrow.gov.uk/ldf</a> with information about this. If you would like to find out more about the Local Plan you can call the LDF Team on 020 8736 6062 or email us at <a href="mailto:ldf@harrow.gov.uk">ldf@harrow.gov.uk</a>.</p> <p>Yours faithfully,</p> <p style="text-align: center;"></p> <p><b>Matthew Paterson</b> LDF Team Leader Harrow Council</p>
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## Appendix G – Letter to the Mayor of London



Mayor of London  
City Hall  
The Queen's Walk  
London  
SE1 2AA

Place Shaping  
Andrew Treham  
Corporate Director

19 July 2012

Dear Mayor,

**Harrow Local Plan – Development Plan Documents Pre-Submission Public Consultation  
27<sup>th</sup> July – 7<sup>th</sup> September 2012.**

As you will be aware, the following **DDDs** which will form part of Harrow's Local Plan have now reached 'pre-submission' stage in accordance with Regulation 19(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012:

- **Development Management Policies,**
- **Harrow and Wealdstone Area Action Plan; and**
- **Site Allocations Development Plan Documents**

I write to you pursuant to section 24(4)(a) of the Planning and Compulsory Purchase Act (2004) and regulation 21(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 to seek your opinion as to the conformity of the pre-submission Development Plan Documents with the London Plan.

In accordance with the statutory requirements, I would be grateful to receive your opinion no later than Friday 7<sup>th</sup> September 2012.

Yours sincerely,

**Stephen Kelly**  
Divisional Director of Place Shaping  
Harrow Council

cc: Giles Dolphin, Head of Planning Decisions, Greater London Authority

# Appendix H – Response Form

## Harrow Local Plan Representation Form

### Pre-Submission Consultation

The Council is publishing three Development Plan Documents for consultation. These are the:

Site Allocations DPD,  
Development Management Policies DPD; and  
Harrow and Wealdstone Area Action Plan DPD

They will be submitted to the Secretary of State for Examination in Public later this year. This is your final chance to make comments on the documents.

### How to Make Comments

\* This form is designed for postal comments, if you wish to respond by email, you do not need to use this form, however please include the information requested here for each comment made (ldf@harrow.gov.uk)\*

If responding by post you will need to use a separate form for each comment that you make. Your comments will be considered by a Planning Inspector, therefore they should only relate to the "Tests of Soundness" (see DPDs appendices for a guide to legal compliance and the tests of soundness)

Complete the form overleaf and return to:

LDF Team Room 301  
London Borough of Harrow  
Civic 1  
Station Road  
Harrow  
HA1 2UY

### Have Internet Access?

### Why not use our online system

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

To ensure your comments are considered, please ensure we receive them by 5pm on Friday 7 September 2012

### Next Steps

Later this year, the Planning Inspector will host an "Examination in Public" to consider the DPDs and comments made to them. The timetable for the Examination in public will be advertised when it has been confirmed.

For further information, please visit [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf) or email [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)

	<b>Development Plan Document (DPD) Representation Form</b>	Ref:  (For official use only)
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Name of the DPD to which this representation relates:

Please return to London Borough of Harrow BY 5pm on Friday 7 September 2012

This form has two parts –  
Part A – Personal Details  
Part B – Your representation(s). Please fill in a separate Part B form for each representation you wish to make.

### Part A

1. Personal Details*	2. Agent's Details (if applicable)	
<small>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</small>		
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

## Respondents to the Pre-Submission Consultation on the Development Management Policies DPD (Appendix I)

1. Hertsmere Borough Council (LA)	2. Harrow Agenda 21 (A)
3. Hatch End Association (A)	4 Campaign for a Better Harrow Environment (A)
5. CBRE on behalf of Dandara (D)	6. Environment Agency (SB)
7. Herts and Middlesex Wildlife Trust (A)	8. Kingsfields Estate Residents Action Group (A)
9. GVA on behalf of Marylebone Property Investments (D)	10. Preston Bennett (D)
11. RP and G Ltd on behalf of Geoffrey Simm (D)	12. RPS on behalf of Pearson Pension Property Fund (D)
13. Stewart Braddock – Croft Partnership (D)	14. Thames Water (SB)
15. Pinner Association (A)	16. Drivers Jonas Deloitte on behalf of RNOH (D)
17. Greater London Authority (SB)	18. CGMS on behalf of the Metropolitan Police (D)
19. NLP on behalf of Capital Shopping Centres (D)	20. English Heritage (SB)
21. Sandra Lee Palmer (R)	22. Dr Diana Dolman (R)
23. Three Rivers District Council (LA)	

### Key

- LA – Local Authority (2)
- A – Amenity Group / Association (6)
- D – Developer / Agent (9)
- SB – Statutory Body (4)
- R – Resident (2)

## **Schedule of Representations to the Pre-Submission Consultation on the Development Management Policies DPD Ordered by Respondent (Appendix J)**

### **Policies where no comments were made:**

Policy 4: Shopfronts and Signs  
Policy 5: Advertisements  
Policy 6: Areas of Special Character  
Policy 8: Enabling Development  
Policy 10: Listed Buildings  
Policy 12: Scheduled Ancient Monuments  
Policy 13: Archaeology  
Policy 14: Nationally Registered Historic Parks and Gardens  
Policy 15: Locally Listed Parks and Gardens  
Policy 19: Sustainable Design and Layout  
Policy 35: Amenity Space  
Policy 36: Protection of Housing  
Policy 42: Managing Economic Activities and Development  
Policy 43: Working at Home  
Policy 57: New Community, Sport and Education Facilities

### **Policies where no issues of soundness or legal compliance were raised**

Policy 7: Heritage Assets  
Policy 20: Decentralised Energy Systems  
Policy 21: Renewable Energy Technology  
Policy 29: Pinner Chalk Mines  
Policy 31 Streetside Greenness and Forecourt Greenery  
Policy 32: Housing Mix  
Policy 38: Sheltered Housing, Care Homes and Extra Care Housing  
Policy 39: Large Houses in Multiple Occupation, Hostels and Secure Accommodation  
Policy 44: Hotel and Tourism Development  
Policy 47: Primary Shopping Frontages  
Policy 49: Other Town Centre Frontages and Neighbourhood Parades  
Policy 51 Mixed-Use Development in Town Centres  
Policy 58: Retention of Existing Community, Sport and Education Facilities  
Policy 61: Planning Obligations

**Respondent 1: Hertsmere Borough Council**

ID	Re p No .	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Rea son	Cha nge	Council's Comments / Response
1	001	Hertsmer e Borough Council	Whole DPD	Yes	No comment	None	Yes		Non e	The Council notes that the Borough Council had no comments to make in relation to the proposed policies of the Development Management Policies DPD.

**Respondent 2: Harrow Agenda 21**

ID	Re p No .	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Rea son	Cha nge	Council's Comments / Response
2	002	Harrow Agenda 21	Policy 23	No	Not consistent with national Policy as set out in Para 19 page 5 of the NPPF	None suggested	No	Non e give n	Non e Sug gest ed	The Council has considered this but disagrees
2	003	Harrow Agenda 21	6	Not Stat ed	The infilling will be detrimental to wild life and really old houses and ruins will have no vehicular access. It will set precedents and cause development of out buildings such as cowsheds and barns and there will be multi	None suggested	No	Non e give n	Non e Sug gest	In accordance with the NPPF paragraph 89, infilling may be appropriate

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					development and not single dwellings				ed	
2	004	Harrow Agenda 21	7	Not Stat ed	<p><b>NO</b> developments allowed on any ruins, if there is a risk to wildlife of any kind. We refer to the suggestion that a ruin in Pear Wood Stanmore be allowed to be pulled down and a mansion built in its place with a part of the wood leased out. The vehicular access needed would have greatly disturbed the wild life, especially that which uses the ruins for shelter.</p> <p>We talk of sustainability, we are losing animal and plant species, we need trees and greenery and peaceful places. The rich should not be able to "buy" these in the green belt denying access by the rest of the community. The value of green spaces to the physical and mental well being of the humans has been well recorded.</p> <p>There should be no further encroachment on London's Green belt of any kind. There have been enough nibbles and one only sets a precedent and others follow, hence why there are now views of Bentley Priory from the Uxbridge Road.</p>	None suggested	No	Non e give n	Non e Sug gest ed	The policy is in accordance with the NPPF. Biodiversity impacts are dealt with in other policies.
2	005	Harrow Agenda 21	23 Section C 3	Not Stat ed	we think that Harrow College and its playing fields should be found another use and not built upon. We suggest a music school; Watford has one, why cannot Harrow?	Music school on Harrow College Site	No	Non e give n	Non e Sug gest	Noted – sites uses are allocated in the Site Allocations DPD, and the College has been allocated for continued



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
									ed	Education use as a minor modification in the Site Allocations DPD. Consequential changes will be made to the accompanying text to reflect this.
2	006	Harrow Agenda 21	C4	Not Stated	Wood Farm in Wood lane should be left as a farm- we are losing too much agriculture land. It is difficult to believe that it cannot again be used for food production. <b>In paragraph 5.33</b> Harrow admits that there are substantial Open Space deficiencies (page 81 Chapter 5)	Keep wood farm as a farm	No	Non e give n	Non e Sug gest ed	Noted – sites uses are allocated in the Site Allocations DPD and this site in question has planning permission which has secured public access to open space.
2	007	Harrow Agenda 21	Policy 3	Yes	We support this; many of us have seen views of the Hill lost in our lifetime. The St, George's centre at the top of Headstone Road and the building at Neptune's point and we dread what will happen on the site of Harrow's old post office. Despite the community's opposition the Inspectorate allowed Neptune Point.	None	No	Non e give n	Non e Sug gest ed	Support noted
2	008	Harrow Agenda 21	Policy 16	Not Stated	Too many people are covering their front gardens completely. Harrow does not appear to summon those who concrete over it all. Especially crazy paving that is impermeable. We understood that a recent law forbade complete coverage. We therefore think that Harrow is not	Improve enforcement	No	Non e give n	Non e Sug gest ed	This an enforcement issue, and not relevant to the soundness or legal compliance of the policies in this consultation

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					effective on this. Why are not people asked to uncover the correct percentage?					
2	009	Harrow Agenda 21	Policy 24	Not Stated	It is important that all Open Space is protected because Harrow is deficient of it and will be unable to meet the needs of its expected increase of population. Please refer to 5.33 There are concerns that section 106 will allow developers to promise enhancements in exchange for permission to build on too much of it. E.g. a hard all weather surface for sport .	No exceptions should be allowed – all open space to be protected	No	Non given	Non Suggested	The policy conforms with paragraph 81 of the NPPF, and has safeguards built in. No change
2	010	Harrow Agenda 21	Policy 26	Not Stated	Harrow is short of Hockey pitches. There is no mention of Lacrosse pitches. There may well be a shortage of junior football pitches when Kodak pitches are lost. Young boys and all girls are being short changed.	Playing pitch demand not specified	No	Non given	Non Suggested	Policy supports increased provision – see also policies 57-59. The use of any pitches are a management decision and outside the scope of this DPD.
2	011	Harrow Agenda 21	5.39	No	There should be no net loss of open space as a result of configuration. We hope that the corollary of “unless there are over riding reasons in the public interest to do so “ is never put into practice and should be crossed out. Developers will promise all sorts of things and argue that what they plan is in the public's interest. Therefore we cannot agree with paragraph A : it goes against the Government NPPF Paragraphs 73, 74,78,and Harrow's Policy 25 which states” <b>A.</b> Land identified as Open Space on the	There should be no net loss of open space as a result of configuration. We hope that the corollary of “unless there are over riding reasons in the public interest to do so “ is never put into practice and should	No	Non given	Non Suggested	This re-configuration is allowed for in paragraph 74 of the NPPF and conforms with Core Strategy policies.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Harrow Policies Map will NOT be released for development.” ( Headstone residents are now fighting the loss of Open space/playing field including tennis courts, which were wrongly excluded by a drafting error and now reinstated by order of the Ombudsman) <b>Paragraph B subparagraph b</b> “ there will be no net loss of open space” . Surely, this refers to ALL open space, private or public. If half is built on there is a net loss. The cost of enhancement i.e. drainage, seeding and hard surfaces is too high if a net loss of space reduces the type of sport that can be played upon it- too small for football!	be crossed out.				
2	012	Harrow Agenda 21	Policy 50	Not Stat ed	The increased number of supermarket selling space will have a detrimental effect on small shops. There will therefore be a surplus and many shops will be empty. Therefore, there should be reconfiguration and some shops should be replaced by flats/parking spaces for the use of shoppers visiting the other shops which are surviving. This would relieve pressure on shoppers and retailers who are losing custom because of no or limited parking nearby.	there should be reconfiguration and some shops should be replaced by flats/parking spaces for the use of shoppers visiting the other shops which are surviving	No	Non e give n	Non e Sug gest ed	This is not in conformity with the NPPFs town centre first policy
2	013	Harrow Agenda 21	8.35	Not Stat ed	Shops turning into residential units is happening. E.g West Harrow, Har5ro on the Hill and Roxborough Road.	None	No	Non e give n	Non e Sug gest ed	Harrow's Core Strategy has identified neighborhood parades and the policies in this DPD seek to prevent this.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
2	014	Harrow Agenda 21	Policy 52 para 8.45	Not Stated	Any chance of the often mentioned multi-purpose hall? Wealdsone or harrow- either will do. The loss of car parks especially the one at Rayners lane will be a great loss to the Community: the planned loss of North Harrow Methodist Church, likewise. Harrow with other London Boroughs must tell the London Assembly that they are ruining the suburbs and making them unpleasant to live in. As people move out it will put pressure on the countryside. The population strategies need looking at and development needs to be away from the SE which is facing many problems including water shortage.	Include potential for new multi purpose hall.	No	None given	None Suggested	Sites are allocated in the Site Allocations DPD or the Area Action plan DPD.  This is beyond the scope of this DPD.

### Respondent 3: Hatch End Association

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	15	Hatch End Association	1.13		Most, if not all, the comments below suggest points where the DPD may be unsound because of errors of internal consistency, lack of clarity, errors in terms used, printing errors (e.g., in line 2 of this paragraph Appendix G should be C), or the like. In addition, on a number of occasions (some are spelled out below), it is suggested that the Council will "support" developments; this	Replace support with approve, and resist with refuse throughout	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					is not normally a Council response to applications, rather it would be more appropriate to say "approved". Similarly, in the contrary situation, there are some inconsistencies where proposals may be either "resisted" or "refused".					to how the policy should be applied. No change.
3	16	Hatch End Association	Policy 1 para 2.7		Policy 1 says that proposals not achieving high standards of design, privacy, etc "will be resisted". Para 2.7 says they "will be refused". This is one example where terminology is unsound through internal inconsistency. Moreover, the last two sentences of 2.7 are repetitions of the policy rather than justifications.	Terminology inconsistent and repetition to be amended	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.
3	17	Hatch End Association	Para 2.12		The spelling error in last line makes the intention unsound. Surely it is intended that external equipment should be DISCREETLY accommodated, i.e. unobtrusive, and not DISCRETELY accommodated, i.e. separated?	Spelling error	Not Specified	None Given	None Suggested	Typographical error – change See proposed modification DM1
3	18	Hatch End Association	Policy 2c		In its everyday meaning "legible" is an awkward adjective to describe the pedestrian/cycling environment; "intelligible" would be clearer. In the final sentence, "(pedestrian and cyclist) permeability" is awkward; "flows" would be better, or possibly "...impede permeability by	Suggested grammatical changes	Not Specified	None Given	None Suggested	This terminology is used in the London Plan and is widely recognized. No change.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					pedestrians and cyclists					
3	19	Hatch End Association	Policy 7b/c		Shouldn't "its settings" be "their settings"?	Suggested grammatical changes	Not Specified	None Given	None Suggested	Agreed, typographical error – change
3	20	Hatch End Association	Policy 11 and Para 3.68		Where a speculative demolition has been made and the local listing justifies it, "reconstruction" or "reinstatement" will be required. Some clarification or indication of exactly what will be required is necessary: a copy of the original, another building of the same type or size, of the same use, or what? The lack of definition is unsound and may cause legal argument.	Make the requirements clearer for reconstruction / reinstatement	Not Specified	None Given	None Suggested	This part of the policy will be removed, as it is not legal.
3	21	Hatch End Association	Policy 23		Last line: for "spacial" substitute "special".	Suggested grammatical changes	Not Specified	None Given	None Suggested	Agreed –Change See proposed modification DM16
3	22	Hatch End Association	Para 5.20		The Wood Farm situation requires up-dating.	Up date the text	Not Specified	None Given	None Suggested	The current situation on this site is outlined in the Site Allocations DPD
3	23	Hatch End Association	Policy 37		COMMENT First line reads "...a net increase in child yield..."; para. 6.53 first line reads "...an increase in child yield numbers...". In	Suggested grammatical	Not Specified	None Given	None Sug	Remove the word 'numbers' for clarity. Child yield is a known

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Hatch End Association			general, "child numbers" might be simpler here and elsewhere.	changes	d	n	gested	planning term. See proposed modification DM25
3	24	Hatch End Association	Para 6.58		The Council's definition of "secure accommodation" in its change of use classification might help here.	Add definition	Not Specified	None Given	None Suggested	This is explained in paragraph 6.58
3	25	Hatch End Association	Policy 48		An argument for an increase in the permitted non-retail frontage from present levels to 50% has not been made or justified.	None suggested	Not Specified	None Given	None Suggested	This percentage has been used for its consistency with secondary frontage as used in the UDP, as these frontages typically have a similar type of retailing / other uses in them, and to help the vitality of these centres so they can respond to changing retail demands. It is shown through shop frontage surveys that Local centres have a broader role and so require a wider range of uses, as reflected in their existing make up, and so a 50% limit is appropriate.
3	26	Hatch End	Chapter 9		Is it too late to include, somewhere in this chapter, a welcome to any proposals which	Add support for disabled access at	Not Specified	None	None	This is expressed in the Core Strategy at CS1 A.b

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Association			introduced lifts in all stations in the borough which would help the disabled, elderly, or pram-pushing passengers to cross between platforms?	stations	specified	Given	Suggested	
3	27	Hatch End Association	Policy 59		Flood-lighting for sports facilities. For "will be supported...[where it would not be, etc]" substitute "will be approved...".	Suggested grammatical changes	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.
3	28	Hatch End Association	Policy 60		Telecommunications....the same comment as for Policy 59. Paragraph 11.7 argues against proliferation of new communications equipment, so that "approved" is arguably better than "supported".	Suggested grammatical changes	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.



**Respondent 4: Campaign for a Better Harrow Environment**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
4	29	Campaign for a Better Harrow Environment	Policy 16		On Policy 16 (Managing Flood Risk), building on sites which are at substantial risk of flooding might be acceptable if properly engineered. This could include using the ground level only for parking vehicles and raising habitable accommodation on piles. The policy stated is insufficiently robust. Giving dry means of escape and not allowing habitable basements in flood –prone areas is not good enough. When flooding occurs and flood water enters homes it is not quick or easy to dry out and clean up afterwards. Flooding is often accompanied by power cuts, epidemics, shortage of alternative accommodation etc. The only sensible way is <b>not to build homes which can be flooded</b> . Neither should developments be allowed which divert flood water to other areas where harm could be done. Paragraph D says that proposals which would involve the loss of undeveloped flood plain “will be resisted”. This should say “refused”.	The policy stated is insufficiently robust. Giving dry means of escape and not allowing habitable basements in flood – prone areas is not good enough. The only sensible way is <b>not to build homes which can be flooded</b> .  <b>Change resisted to refused.</b>	Not Specified	None Given	None Suggested	Policy is acceptable by the Environment Agency and conforms with the NPPF as it directs development away from areas of highest flood risk. In built up areas, re-development needs mean this principle cannot always be met. Therefore in these cases the Council will ensure that the new development is resilient and resistant to flood risk, and does not increase the risk of flooding elsewhere
4	30	Campaign for a Better Harrow Environment	4.32		In Paragraph 4.32 (Ensure separation of surface and foul water systems), one would feel more comfortable if the “major developments involving modifications to or extension of the surface water and foul water networks to maintain separation of the two systems” could be guaranteed to take place.	None suggested	Not Specified	None Given	None Suggested	Policy seeks this but it cannot be guaranteed in the document. This is a matter for Thames Water and the Council's drainage department at the application and build

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										stage of development, and would be subject to enforcement for compliance.
4	31	Campaign for a Better Harrow Environment	4.49		On Policy 16 (Rivers and Watercourses), para 4.49 is too weak. It says that proposals which adversely affect the condition or functioning of the river or watercourse within, adjacent to or downstream of the site, and proposals which fail to secure feasible enhancements or deculverting in accordance with this policy, will be resisted. We think that resisted should be replaced by <b>refused</b> .	Replace resisted with refused	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.
4	32	Campaign for a Better Harrow Environment	Policy 22C		Policy 22 C (Land Contamination) needs to be strengthened. It says that proposals which fail to demonstrate that intended use would be compatible with the condition of the land or which fail to exploit appropriate opportunities for decontamination will be resisted. Again, we think that resisted should be replaced by <b>refused</b> .	Replace resisted with refused	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.
4	33	Campaign for a Better Harrow Environment	Policy 34		a) Policy 34 supports the conversion of houses into multiple units. It lists criteria concerning the quality of conversions and the effects on neighbouring residents and admits (in paragraph 6.27) that further harm	Include monitoring proposals to demonstrate how this policy would be implemented	Not Specified	None Given	None Suggested	Disagree. Paragraph 6.27 seeks to highlight that where an area has suffered from poor conversions in the past does not see a

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					to the character of areas that have already experienced high conversion rates should be avoided. We agree with this, but there is no indication as to how this policy will be implemented. In order to be effective conversion rates must be carefully monitored and controlled not only in areas already damaged but also in areas where present rates are low but likely to rise under pressure for development.					precedence for future conversions.
4	34	Campaign for a Better Harrow Environment	Policy 37		b) Policy 37 deals with the increased need for play areas for children and young people resulting from residential developments. It states that a financial contribution to improvement of existing local facilities will be sought from developers, where these cannot be provided on site. This policy may work in some parts of the Borough but there is a danger that it may result in the over use of facilities close to the Intensification Area, where the pressure of increased population density will be much higher. This should be acknowledged in policy 37 and the option of contributing to the provision of additional space introduced. We suggest the following additional clause:	Add following clause to policy:  D. If the existing play facilities have already reached full capacity, contributions will be sought to equip new space.'	Not Specified	None Given	None Suggested	The policy seeks on site provision. Where this is not achievable any off site provision would be expected to take into account existing supply and demand, and so meet the additional demand through increased provision off site where not feasible on site.  For clarity, textual change in part A to replace the word 'expected' to 'required'. See proposed modification DM26  Text to be added in the R.J after the word

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					'D. If the existing play facilities have already reached full capacity, contributions will be sought to equip new space.'					'sought' to state," Offsite provision, including the creation of new facilities; improvements to existing provision; and/or an appropriate financial contribution secured by legal agreement towards this provision may be acceptable where it can be demonstrated that it fully satisfies the needs of the development whilst continuing to meet the needs of existing residents. See proposed modification DM27
4	35	Campaign for a Better Harrow Environment	Policy 46		Policy 46 prioritises the selection of sites for retail and leisure proposals throughout the Borough. There is strong economic justification for focusing these developments in town centres in order to strengthen their ability to attract custom but it is acknowledged that edge of centre and out of centre sites will be considered in the event that no site within a centre is suitable. We agree with the general strategy but feel that economic considerations are not the only ones for sites on the edge of centre or out of centre: the effect on existing neighbouring residential areas should also be taken into account. We therefore suggest adding 'or	We therefore suggest adding 'or neighbouring residents' to the last sentence of clauses Ab and Bd which deal with the potential harm of developments in these locations.	Not Specified	None Given	None Suggested	This is covered by Policy 1 C and so does not need adding here.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					neighbouring residents' to the last sentence of clauses Ab and Bd which deal with the potential harm of developments in these locations.					
4	36	Campaign for a Better Harrow Environment	Policy 53		As in the AAP, we feel that in Policy 53 Parking Standards 53 D the emphasis on car clubs needs to be stronger: Encouraging rather than supporting car clubs. The reasoned justification assumes that high levels of car ownership will continue. We question whether this is realistic in an area where intensification of development will increase demand for road space for both parking and driving even beyond the present levels, which are approaching saturation at times in many parts of central Harrow. We feel that modal shift away from single occupancy car use by able-bodied drivers should be a high priority for central Harrow, and for London as a whole	The emphasis on car clubs needs to be stronger: Encouraging rather than supporting car clubs.	Not Specified	Non Given	Non Suggested	Agreed – wording change from 'supporting' to be replaced with 'encouraging' to reflect the Council's position on sustainable transport. See proposed modification DM36
4	37	Campaign for a Better Harrow Environment	Policy 54		Transport Assessments (Policy 54) need to be realistic, not merely a 'stitch-up' between developers and council officers, as happened at Neptune Point. There needs to be provision for independent assessment of TA's by impartial third party experts to ensure that the assessments are realistic and robust.	There needs to be provision for independent assessment of TA's by impartial third party experts	Not Specified	Non Given	Non Suggested	Transport assessments are published as part of any planning application so they can be scrutinized. They are also compelled to comply with TfL guidance
4	38	Campaign for a	Schedule 4		Schedule 4 lists the protected views of Harrow-on the Hill and the Weald Ridge	Clarify if maximum height thresholds in	Not Specified	Non Given	Non Given	Agreed – clarify that it is in metres

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Better Harrow Environment			<p>proposed by SLR consultants in their assessment (December 2011). Changes have been made subsequently (July 2012). Some of these changes are apparently to aid interpretation, although more explanation is needed for lay people to be able to understand the significance (for example, are the values for maximum height thresholds in feet or metres?). Also the dimensions of the protected areas for several views have been altered. In 2 cases we feel that the changes substantially reduce protection of the view and undermine the assessment as part of the evidence base:</p> <p>a) <b><u>View 6: Harrow Recreation Ground</u></b>  The photograph was changed in response to a comment that now Neptune Point is complete, the yellow line indicating the height of the consultation viewing zone is too low. In the new photomontage, not only the yellow line but also the red line, indicating the threshold of the central viewing corridor has been raised. This is wholly unjustified as there are no tall buildings in the foreground or middle ground in this zone and if a development were to be permitted very little of the top of the hill would still be visible, disconnected from its base. Extending the threshold of this zone would also mean that no part of the Hill or St Mary's church would be visible from the lower levels of the recreation ground. We therefore suggest that, in order to be effective</p>	<p>feet or metres</p> <p>We therefore suggest that, in order to be effective in protecting this view, the red line should be made considerably lower than the yellow line, thus ensuring that some view of the Hill remains</p>	<p>defined</p>	<p>Given</p>	<p>Suggested</p>	<p>Changes to the landmark viewing corridor and wider setting consultation area were included in the views assessment upon the recommendation of the consultant taking into account the impact that Neptune Point and Bradstowe house already have upon this view.</p>

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Rea son	Cha nge	Council's Comments / Response
					<p>in protecting this view, the red line should be made considerably lower than the yellow line, thus ensuring that some view of the Hill remains, albeit shuttered by recent developments.</p> <p>b) <b>View 11: Wood Farm</b> Both the plan diagram and the photograph have been changed to reduce the red viewing corridor to a quarter or less of its original width. This now means that only the top of the Hill is within this zone whereas previously the whole Hill was included. This change was not prompted by comments via public consultation and, unlike view 2, does not apparently correct a mismatch between the diagram and photomontage. It does, however, substantially compromise protection of this view: several significant sites allocated for development in the Intensification Area, including Lyon House and Gayton Road, now lie in the less protected yellow consultation area rather than the better protected red viewing corridor.</p> <p>2. There appears to be confusion between Harrow View and Harrow Recreation Ground in the descriptions of the view: The same narrative is used in sections 4.1 and 4.6, though the view is different. Visual Management Guidance for both views states that "No new structures should be permitted which would breach the current skyline</p>					<p>No change. The viewcone was reduced in size due to the consultants opinion that the viewcone published for consultation was set too wide.</p> <p>This is an error, the correct text will be inserted from the Views Assessment document.</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					formed by St. Mary's and Harrow on the Hill." Whilst we welcome this, sadly it is a classic case of stable door closing, as the visual intrusion to the skyline caused by Bradstowe House and more particularly Neptune Point have already seriously damaged the view from Harrow Recreation Ground.					

#### Respondent 5: CBRE Dandara

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
5	39	CBRE Dandara	Policy 3	No	Proposed policy 3 of the above pre-submission DPD considers the protection of views and vistas within the Borough of Harrow, making specific reference to the Views Assessment document published in July 2012 as part of the evidence base for the Local Development Framework. The Views Assessment has not been subject to any consultation or independent testing.	None	Not Specified	None Given	None Suggested	The views assessment was published and made available on the Council's website, as is every other evidence base document. It was also consulted on in January 2012, and it is noted that CBRE responded to this consultation, as you reference in your subsequent representation.
5	40	CBRE Dandara	Policy 3	No	Policy 3 goes on to establish seven controls where a protected view exists. Controls a. and b. consider the way in which	None	Not Specified	None Given	None Suggested	Noted



ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Leg al	Rea son	Cha nge	Council's Comments / Response
					new development should respond to the red and yellow lines communicated within the eleven protected views, as detailed within the Views Assessment document and appended within Schedule 4 to the DM DPD. Control a. states that development should be refused if it exceeds the threshold height of the red line within the landmark viewing corridor. Control b. states that development in the wider setting consultation area (shown in yellow) should form an attractive element in its own right and preserve or enhance the viewers ability to recognise and appreciate the landmark.		d	n	gest ed	
5	41	CBRE Dandara	Policy 3	No	<p>Policy 3 provides five further controls (C. to G.) which state in outline:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Development should not harm the character and composition of the protected views, and preserve and enhance viewers ability to recognise and appreciate important landmarks;</li> <li><input type="checkbox"/> Development should not be overly intrusive or unsightly to the detriment of the view, or detract from the prominence of the landmark within the foreground and middle ground;</li> <li><input type="checkbox"/> Development should give context to and not harm the composition of the view when in the background;</li> </ul> <p>Viewing places should be accessible and managed to enhance experience of the view, and;</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Opportunities for new views should be exploited through the design of new development.</li> </ul>	methodology applied to identify the red and yellow line positions would have considered the outcome of the 51 College Rd appeal	Not Specified	Non e Give n	Non e Sug gest ed	The Views Assessment was carried out by an appropriately qualified professional consultant, and was subject to public consultation and revised accordingly. The Council is satisfied that its methodology and conclusions are robust.

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Rea son	Cha nge	Council's Comments / Response
					<p>2. Policy Testing</p> <p>2.1. The above policy significantly relies on the interpretation of the Views Assessment document in respect of the exact alignment of the red and yellow lines. The methodology contained within the Views Assessment document outlines how each of the existing protected views are assessed to confirm whether their protected status should remain. However, no methodology is provided which explains how the red and yellow lines that feature so prominently within the draft policy 3 have been prepared and tested. This appears to be a major omission, as the exact drawing of the lines carry the weight of the policy.</p> <p>2.2. Moreover, representations were made in February 2012 in respect of a draft of the Views Assessment Document (in relation to the Harrow and Wealdstone Intensification Area AAP), that pointed out how the definition of the development height restrictions contradicted the conclusions of the Secretary of State in an appeal at 51 College Road, Harrow in March 2010. It is recognised that the final Views Assessment document has been refined from this initial draft, however the methodology and degree of rigour in testing the definition of the red and yellow lines remains a concern, particularly when some aspects of the Views Assessment Document remain in conflict with the Secretary of State's decision of the appeal mentioned above. The attached Figures 1 to 4 highlight</p>					

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>this position. We would expect that the methodology applied to identify the red and yellow line positions would have considered the outcome of such a significant planning appeal, in which verified montages were prepared, presented and cross examined in front of an experienced Inspector. This level of rigour is not common, and would prove invaluable in what is often a difficult judgement as to where such a development height restriction should be located.</p> <p>That makes the lack of reference to the Secretary of State's decision strange, particularly as the author gave evidence at that public inquiry. Furthermore, the result of the Secretary of State's decision was discussed at the Core Strategy's EiP where the Inspector advised that reference to the acceptability of a tall building at 51 College Road by virtue of this decision should explicitly be included within the Core Strategy. The Core Strategy was subsequently revised and adopted accordingly.</p>					
5	42	CBRE Dandara	Policy 3	No	<p>As stated above, it is explicitly stated within the Core Strategy that 51 College Road, is an appropriate location for a tall building. Representations have been submitted in respect of the Harrow and Wealdstone Intensification Area AAP requesting that, to be consistent with the Core Strategy, the policy framework within the AAP should also make explicit reference to a tall building</p>	<p>Policy 3 of the DM DPD is clearly at odds with this and inconsistent with the Core Strategy by stating that development should not exceed the red line as it has clearly</p>	Not Specified	None Given	None Suggested	<p>The Views Assessment was carried out by an appropriately qualified professional consultant, and was subject to public consultation and revised accordingly. The Council is satisfied that its methodology and</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					being acceptable in principle at 51 College Road. The APP does state within the Site Specific Guidance for Site 18 that up to 19 storeys on the site is acceptable. Policy 3 of the DM DPD is clearly at odds with this and inconsistent with the Core Strategy by stating that development should not exceed the red line as it has clearly been accepted within the adopted CS that at 51 College Road it is acceptable to do so.	been accepted within the adopted CS that at 51 College Road it is acceptable to do so.				conclusions are robust.
5	43	CBRE Dandara	Policy 3	No	<p>Draft Policy 3 of the Development Management DPD is not considered to be justified, and therefore sound, due to:</p> <p>i. The lack of rigor in the methodology leading to the identification of the red and yellow lines within the Views Assessment Document;</p> <p>ii. The lack of reference to the appeal decision for 51 College Road, in which aspects of the Views Assessment document directly contradicts, and;</p> <p>iii. The lack of co-ordination with other DPD documents, such as the adopted Core Strategy.</p> <p>iv. The restrictions imposed by Policy 3, specifically the red and yellow lines, raise significant questions as to the ability to deliver the AAP objectives and target outputs due to the limitations on the scale of buildings it imposes..</p> <p>4.2. The Views Assessment document should in our opinion be reviewed separately to consider the above, and be revised as necessary. At the very least, Policy 3 should be consistent with the adopted Core</p>	Policy 3 should explicitly state that the principle of a tall building (thus breaking the threshold height lines) has been accepted at 51 College Road.	Not Specific	None	None	<p>The Views Assessment was carried out by an appropriately qualified professional consultant, and was subject to public consultation and revised accordingly. The Council is satisfied that its methodology and conclusions are robust.</p> <p>With regards to point 2, this is contained in the Core Strategy and Area Action Plan, and is not needed here.</p> <p>Regarding point 3, this DPD contains general policy for the whole Borough, and has been developed to be in conformity with the Core Strategy.</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Strategy, and therefore to be sound, Policy 3 should explicitly state that the principle of a tall building (thus breaking the threshold height lines) has been accepted at 51 College Road.					Site specifics are dealt with in the Area Action Plan, including indicative heights etc. The policy reflects the evidence base, and the subject site is dealt with in the Area Action Plan.

#### Respondent 6: Environment Agency

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
6	44	Environment Agency	Policy 16	Yes	We strongly support this policy as it addresses flood risk in line with the National Planning Policy Framework.	None	Not Specified	None Given	None Suggested	Support noted
6	45	Environment Agency	Policy 17	Yes	We fully support this policy and the commitment to both limit mains water consumption to 105 litres per person per day and to achieve greenfield runoff rates.	None	Not Specified	None Given	None Suggested	Support noted
6	46	Environment Agency	Policy 18	Yes	We strongly support this policy on all points. This will help protect biodiversity and manage flood risk in line with the National Planning Policy Framework. It will also help to achieve the objectives of the Water	None	Not Specified	None Given	None Suggested	Support noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Framework Directive.				ed	
6	47	Environment Agency	Policy 22	Yes	We strongly support this policy as it addresses the treatment of contaminated land. This is in line with the National Planning Policy Framework and will help to achieve the objectives of the Water Framework Directive.	None	Not Specified	None Given	None Suggested	Support noted
6	48	Environment Agency	Policy 27	Yes	We support this policy and the protection of biodiversity which in line with the National Planning Policy Framework.	None	Not Specified	None Given	None Suggested	Support noted
6	49	Environment Agency	Policy 28	Yes	We strongly support this policy and the commitment to enhancing biodiversity. This is in line with The National Planning Policy Framework.	None	Not Specified	None Given	None Suggested	Support noted

#### Respondent 7: Herts and Middlesex Wildlife Trust

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
7	50	Herts	Policy	Yes	Herts & Middlesex Wildlife Trust welcomes	The Council should	Not	Non	Non	Support noted.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		and Middlesex Wildlife Trust	16, 17 and 18		<p>the above Policies, which should help contribute to the achievement of more environmentally sound and sustainable development within Harrow.</p> <p>We welcome the attention that has been paid to developing policy sets targeting different aspects of environmental sustainability (Policies 16 to 22). In particular, the Policies 16, 17, and 18 relating to sustainable flood risk management and to rivers and water courses are welcome.</p> <p>Unsustainable levels of water abstraction and usage can have a severely detrimental impact on ecosystems, through removing water from the natural environment, altering river levels and flow rates, and changing the characteristics of associated habitats. Policies to reduce water consumption and also encourage natural drainage and groundwater recharge are strongly supported. The Council should expect all developments (including minor) to seek to include SUDS measures. We would add that the Council should encourage use of SUDS techniques which also help to achieve biodiversity goals. Building in the floodplain can dramatically alter the local hydrology, damage habitats and ecosystem function, and interrupt ecological networks. It is important that building in the floodplain is clearly opposed in local plans.</p> <p>HMWT are pleased to see Policy 18.</p>	expect all developments (including minor) to seek to include SUDS measures.	Specified	Give	Suggested	<p>Agreed change – Text will be added to Policy 17, part C, to state 'proposals for minor, householder and conversions'.</p> <p>Wording change of where 'possible' to where 'feasible'</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Restoration of more natural river systems has the potential to substantially improve ecological connectivity, and enable wildlife to move through built up areas.					
7	51	Herts and Middlesex Wildlife Trust	Policy 23 and 24	Yes	<p>It is important that the contribution that certain Green Belt sites (including previously developed land) can make to biodiversity. Planning proposals on these sites should ensure that impacts are avoided as far as possible, mitigated, and compensated for (as a last resort).</p> <p>Permission should not be granted for developments on these sites if the biodiversity impact is significant, and cannot be avoided or sufficiently mitigated.</p>	Cross reference to Policy 27.	Not Specified	None Given	None Suggested	Insert reference in the text to policy 27 and 28 in part A e to ensure biodiversity is fully recognised
7	52	Herts and Middlesex Wildlife Trust	Policy 27	Yes	<p>The above policy is generally supported, but could be improved and made more consistent with national policy.</p> <p>We welcome the policy to resist proposals that may adversely impact local biodiversity, and are pleased to see reference made to the Harrow BAP.</p> <p>The policy would be stronger and more in line with the NPPF (paragraph 118) if a clear hierarchy is communicated, to favour avoidance, mitigation and finally compensation for any losses of features or</p>	Stronger wording to communicate hierarchy of avoid, mitigate and compensate, for harm to biodiversity interests. Proposals not meeting this hierarchy and sufficiently addressing losses/damage should be refused, in line with the	Not Specified	None Given	None Suggested	<p>Support noted</p> <p>The introductory text to this policy covers the NPPF requirements. Agree that policy needs to include reference to mitigation.</p> <p>Policy text to be amended to read 'Potential impacts on Biodiversity should be avoided or appropriate mitigation sought'.</p>



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					habitats of biodiversity value. Compensation, and in particular off-site compensation, should only be accepted exceptionally	NPPF paragraph 118				
7		Herts and Middlesex Wildlife Trust	Policy 28	Yes	<p>The above policy is generally supported, but could be improved and made more consistent with national policy</p> <p>We welcome this encouragement for proposals to enhance local biodiversity. It is positive to see the various ways this can be achieved listed, as this adds clarity and substance to the policy. However, it is advised that the policy wording is adjusted or added to, in order to communicate that certain 'enhancements' are more valuable than others. Higher value enhancements should be expected in larger scale developments, where the potential opportunities are greater, and where the potential adverse impacts of the development are greater. Lower impact options in isolation, such as installing bird and bat boxes, would only be sufficient for householder and minor applications, where the impacts are less and opportunities more constrained.</p> <p>It would be beneficial also to communicate in the body text that enhancement proposals should be informed by ecological surveys of the site and surrounding areas, which would reveal where the potential opportunities lie.</p> <p>Proposals should seek to make maximum</p>	<p>Policy wording should be adjusted or added to, in order to communicate that certain 'enhancements' are more valuable than others. Higher value enhancements should be expected in larger scale developments, where the potential opportunities are greater, and where the potential adverse impacts of the development are greater. Lower impact options in isolation, such as installing bird and bat boxes, would only be sufficient for householder and minor applications, where the impacts are less and opportunities more constrained.</p>	Not Specified	None Given	None Suggested	<p>The types of enhancements that are needed / possible, depend on the developments context and size – to be determined at application stage.</p> <p>Harrow's Biodiversity Action plan has a range of improvements</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					beneficial impact to the local ecological network. This is facilitated through early discussions and integrating the concepts of landscape-scale, ecosystem based conservation, at an early point in proposal development.	It would be beneficial also to communicate in the body text that enhancement proposals should be informed by ecological surveys of the site and surrounding areas, which would reveal where the potential opportunities lie.				
7	53	Herts and Middlesex Wildlife Trust	Policy 30	Yes	<p>The above policy is generally supported, but could be improved and made more consistent with national policy.</p> <p>This policy should recognise more explicitly the biodiversity value of trees, as well as their amenity value.</p> <p>In some cases, trees judged of low value against arboricultural or amenity criteria can be of great value for wildlife. For instance rot holes, cracks and crevices in old, mature trees provide potential nesting sites for birds like woodpeckers and roosting sites for bats. Rotting wood also supports a large diversity of invertebrate species, which themselves attract other animals to the tree. The biodiversity value of trees should be considered before they are scheduled for removal. Proposals should seek to retain</p>	<p>"The design and layout of development on sites where there are existing trees should secure the retention and survival of any trees the subject of tree preservation orders and others of significant amenity or <u>biodiversity</u> value. Proposals that would lead to the unnecessary removal of any trees</p>	Not Specified	None Given	None Suggested	Tree preservation orders can only be placed based on amenity value. Therefore the policy would not be sound if the Council sought to place TPO's based on biodiversity value.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>mature trees with characteristics attractive to wildlife, as well as standing and fallen dead wood (health and safety considerations permitting). Where trees are removed, the felled wood and other dead wood should be retained on site, to create habitat for wildlife such as invertebrates, amphibians and small mammals.</p> <p>It is positive to see that the policy encourages landscaping which will benefit biodiversity.</p>	the subject of tree preservation orders and others of significant amenity or biodiversity value, or which would prejudice their survival, will be resisted.”				
7	54	Herts and Middlesex Wildlife Trust	General	Yes	<p>Paragraph 109 of the National Planning Policy Framework (NPPF) sets out that the planning system should “contribute to and enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity where possible... including by establishing coherent ecological networks that are more resilient to current and future pressures.”</p> <p>Paragraph 114 confirms that local planning authorities should... “set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.”</p> <p>Paragraph 117 states that, in order to minimise impacts on biodiversity, planning policies should <i>inter alia</i>:</p> <ul style="list-style-type: none"> <li>• plan for biodiversity at a landscape-</li> </ul>	None	Not Specified	None Given	None Suggested	Justification noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>scale;</p> <ul style="list-style-type: none"> <li>• identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration and creation;</li> <li>• promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets.</li> </ul> <p>Following Paragraph 165 of the NPPF, planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area. The Framework directs that this should include an assessment of existing and potential components of ecological networks.</p> <p>When determining planning applications, paragraph 118 of the NPPF states that local planning authorities should aim to conserve and enhance biodiversity by applying the principles listed in the document, amongst</p>					

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					<p>which:</p> <ul style="list-style-type: none"> <li>• If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;</li> <li>• Proposed development on land within or outside of a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;</li> <li>• Development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;</li> <li>• Opportunities to incorporate biodiversity in and around developments should be encouraged;</li> </ul>					

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<ul style="list-style-type: none"> <li>Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits or, the development in that location clearly outweigh the loss.</li> </ul> <p>Paragraph 176 states, "Where safeguards are necessary to make a particular development acceptable in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements."</p> <p>NOTE: The government circular 06/2005 <i>Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System</i>, has been retained and remains as valid guidance for local planning authorities on decisions affecting protected species and designated nature conservation sites.</p>					

**Respondent 8: Kingsfield Estate Residents Action Group**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
8	55	Kingsfield Estate Residents Action Group	Policy 24	Yes	<b>Policy 24 is supported.</b>	None	Not Specified	None Given	None Suggested	Support noted
8	56	Kingsfield Estate Residents Action Group	Policy 25 Item 4.(1)	No	we do not believe it to be compliant or sound as it goes against <b>paragraph 74</b> in the National Planning Policy Framework.	None suggested	Not Specified	None Given	None Suggested	No change – the Council believes that the policy is in conformity with the NPPF
8	57	Kingsfield Estate Residents Action Group	Policy 25 – 3	No	<b>Policy 5 – 3</b> The decision to allow building on St. Georges field is not consistent with National Policy nor, as the inspector admitted at the time, policy EP20.	None suggested	Not Specified	None Given	None Suggested	This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation The Core Strategy and this DPD address this issue and will be applicable to any future applications of this nature.
8	58	Estate Residents Action Group	Policy 25	No	We consider this should be changed so that all open space is protected from development as set out in para 74 of the NPPF. It is wrong that the inspectorate can overturn the council's decision to protect open space, as happened with St. Georges Playing Field Headstone. This private field bought by parishioners'	We consider this should be changed so that all open space is protected from development as set out in para 74 of the NPPF	Not Specified	None Given	None Suggested	This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation The Core Strategy and

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					contributions for recreation and sport, had a cricket and tennis club established in the late 1920s. Both of these clubs were harassed and caused to leave. The ground is now only used by Scouts, who have a scout hut, again bought by public contributions and help from the council, and are the only people allowed to use part of the field. The Scouts are granted short leases. There are also local people who have back garden access who are regarded as "trespassers".					this DPD address this issue and will be applicable to any future applications of this nature.
8	59	Estate Residents Action Group	Policy 25		<b>Paragraph B sub paragraph c</b> : we fear that this removes the protection of Open Space. In the case of St. George's playing field, over half will be developed for housing and a church car park, and the community will have only about 0.69 Hectares left, according to the Council. This area will probably be unsuitable for any sport requiring pitches, such as cricket. This goes against the inspector's wishes. When the inspector made his decision the tennis courts had been wrongly excluded from the open space, which has now been reinstated under the direction of the ombudsman. The whole field is 1.4 hectares (about 3.5 acres). We think that this paragraph c should be modified and not allow over half of open space to be lost, to build houses when housing targets are being met.	We think that this paragraph c should be modified and not allow over half of open space to be lost, to build houses when housing targets are being met.	Not Specified	Non Give n	Non Suggested	This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation The Core Strategy and this DPD address this issue and will be applicable to any future applications of this nature.  Disagree – part B.b allows for reconfiguration only where there would be no net loss of open space in accordance with Core Strategy policy.
8	60	Kingsfiel	Policy		We support this policy and hope that the	Define Function and	Not	Non	Non	Function and Viability



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		d Estate Resident s Action Group	25f		term " inappropriate use" includes the development of housing, whatever the condition of the open space. The terms "Function and Viability" are not clearly defined . S 106 agreements with developers should not be allowed regarding Open Space , especially when the Community loses over half of it. We would like to refer to 5.33 and 5.34 and 5.35 which points out the deficiency of open space, sport and recreation grounds in the LB Harrow.	Viability  S 106 agreements with developers should not be allowed regarding Open Space	Specified	e Given	e Suggested	have their normal definition  Section 106 agreements will only be made to secure public access on the basis of no net loss through this policy.
8	61	Kingsfield Estate Resident s Action Group	5.35		the last word in this paragraph should be" refused " and not "resisted". This is because the terms "viable" and " function " applied to open space is open to many interpretations. For example; St. Georges field once open for all professing members of the C.of E. is now firmly closed to the public, except for the scouts, but still functions as a wildlife haven which includes bats and birds. This field should be preserved, surely, if the government and Council are serious about sustainability and biodiversity	Substitute resisted with refused	Not Specified	Non e Given	Non e Suggested	This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation The Core Strategy and this DPD address this issue and will be applicable to any future applications of this nature.
8	62	Kingsfield Estate Resident s Action Group	Policy 27	Yes	We wholeheartedly support this policy and think that part of St. George's Playing Field could provide a nature reserve in a place deficient of such places. St. George's field is near the Wealdstone/Harrow intensification plan.	None	Not Specified	Non e Given	Non e Suggested	Support noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
8	63	Kingsfield Estate Residents Action Group	Policy 5.51	Yes	we support , there are bats in St. Georges field, who are probably in the loft of the Scout hut where they fled, when their ancient hedgerow in which they lived, was destroyed days before its protection by law came into force. Surely, the destruction of their environment goes against the council and the NPPF's policy on biodiversity.	None	Not Specified	None Given	None Suggested	Support noted
8	64	Kingsfield Estate Residents Action Group	5.5-5.55	Yes	<b>We also support 5.5 to, 5.55</b> inclusive; we totally support all of these .	None	Not Specified	None Given	None Suggested	Support noted
8	65	Kingsfield Estate Residents Action Group	Policy 28,30, 31 and 45	Yes	We wholeheartedly support all of these policies.	None	Not Specified	None Given	None Suggested	Support noted
8	66	Kingsfield Estate Residents Action Group	Policy 34		Preferably parking should be on site and not overflow onto the road. Parked cars are a hazard for cyclists.	Specify parking to be on site.	Not Specified	None Given	None Suggested	Assessment of adequacy of parking arrangements is set out in Policy 53.

**Respondent 9: GVA on behalf of Marylebone Property Investments**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
9	67	GVA on behalf of Marylebone Property Investments	Policy 30	No	Policy 30 is unsound because it is not effective. Policy 30 supports the retention and survival of trees that are the subject of tree preservation orders and others of significant amenity value. We would suggest that some flexibility is used in the wording of this policy to ensure that their value is balanced against the wider benefits proposed by developments.	We would suggest that the following wording is used: <i>(A) The design and layout of development on sites where there are existing trees should secure the retention and survival of any trees the subject of tree preservation orders and others of significant amenity value, unless their retention is outweighed by the overarching benefits of the development'.</i>	Not Specified	None Given	None Suggested	The Policy will be amended to delete the second sentence of part A and replace it with text as a new part B for clarity. This will state "The removal of trees subject to TPOs or assessed as being of significant amenity value will only be considered acceptable where it can be demonstrated that the loss of the tree(s) is outweighed by the wider public benefits of the proposal". This will ensure flexibility where needed.
9	68	GVA on behalf of Marylebone Property Investments	Policy 33	No	Policy 33, Part (d) is not sound because it is not effective. In instances where the demolition and redevelopment of redundant office buildings is not feasible, we would welcome the policy support for the conversion of office uses to residential as set out in Policy 33. However, Part (d) of the policy states that proposed apartments should be dual aspect wherever possible, and that a sole aspect apartment	We would instead suggest that the following wording is used: (d) Proposed apartments should be dual aspect where the form of the building allows.	Not Specified	None Given	None Suggested	The Council expects all development to meet the highest amenity standards, what is applicable to new build is also applicable to conversions. The policy has sufficient flexibility by use of the words 'generally be

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					overlooking a parking court or other shared use rear area would generally be unacceptable. We consider that this level of detail does not provide sufficient flexibility for the conversion of existing buildings to residential uses. Opportunities to retain embodied energy within buildings should be explored, but the process of converting existing uses can result in constraints on design. Furthermore, detailed guidance in relation to housing design is set out within the Mayor's Supplementary Planning Guidance on Housing and within the London Housing Design Guide.	<del>A sole aspect apartment into a parking court or other shared use rear area will generally be unacceptable.</del>				unacceptable' This does not completely preclude sole aspect developments. The retention of the full wording is necessary to ensure that wherever it is possible to achieve dual aspect, it is done.
9	69	GVA on behalf of Marylebone Property Investments	Policy 40	No	Parts (E. b) and (F) of Policy 40 are not sound because they are not consistent with national policy. The National Planning Policy Framework sets out that 'planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose' (Para 22). Part (E) of Policy 40 sets out the definition of surplus industrial and business use land and floorspace. However, Part (b) of this section states that floorspace will only be considered surplus to requirements where 'the assessment of demand and supply demonstrates that there are no other, sequentially more preferable sites that are surplus to requirements'. We consider that the inclusion of Part (E. b) would preclude suitable sites that are readily	We consider that the inclusion of Part (E. b) would preclude suitable sites that are readily available from being developed for alternative uses and should be removed. We would also suggest that Part (F), which sets out the sequential order of preference for site release is also deleted.	Not Specified	None Given	None Suggested	Part E.b to be amended to read "the assessment of supply and demand demonstrates that there are no other sequentially less preferable sites that are surplus to requirements" This is to rectify a mistake replacing the word "more" with "less".  Regardless of this minor wording change, the intent of the policy remains the same, to protect employment land that is in use or where there is a demand for it.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					available from being developed for alternative uses and should be removed. We would also suggest that Part (F), which sets out the sequential order of preference for site release is also deleted.					The release criteria are necessary to ensure that land that is least desirable and thus a low reasonable chance of it being used for future employment purposes is released over land that has higher prospects of being utilized for employment uses. This level of protection and the release criteria are in conformity with the NPPF as the policy allows for the release of sites that are no longer required, thus avoiding long term protection of employment land where there is no reasonable prospect of it being used for that purpose. No change.
9	70	GVA on behalf of Marylebone Property Investments	Policy 41		Further clarity is required to ensure that Part (B) of Policy 41 is effective. We welcome the provisions for redevelopment or change of use of purpose-built offices in town centres where buildings are no longer fit for office occupation and it is demonstrated that there is a surplus of office space throughout the Borough, as set out in Policy 41. Part (B), however, states that proposals for comprehensive redevelopment or change of	We would instead suggest that the following alternative wording is used: <i>(B) 'Within Intensification Areas, proposals for the comprehensive redevelopment or change of use of buildings which</i>	Not Specified	None Given	None Suggested	Part B applies across the Borough  Paragraph 7.36 explains the amount of floorspace that could be required.  For clarity in part B add the word 'existing' before buildings and remove 'which provide' and

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					use of buildings which provide over 1,000 square metres of office floorspace will be required to make viable provision for replacement office space or other appropriate economic uses. The wording of Part (C), 'in other locations beyond the Intensification Area' suggests that, Part (B) relates to areas within the Intensification Area, and this should be clarified. Furthermore, should the existing office floorspace referred to in Part (B) be surplus, we would suggest that there would not be a requirement for this floorspace to be reprovided elsewhere within the Borough.	<i>provide 1,000 or more square metres of office floorspace will be required to make viable provision for replacement office space or other appropriate economic uses, unless an assessment of demand and supply demonstrates that there is surplus office space in the Borough, taking into account any unimplemented planning permissions'.</i>				replace with 'of'.  Add sub heading before part C to state Offices outside of town centres  Part C to be re-worded to clarify that it refers to offices that are not in town centre locations or within the Northolt Road business use area

**Respondent 10: Preston Bennett**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
10	71	Preston Bennett	Introduction		It is noted at the outset that it is highlighted at various junctures of	There should remain a site-by-site analysis of other	Not Specific	None	None	This issue has been dealt with through the Core Strategy including at the

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					the DPD that residential garden land is no longer classified as 'previously developed land'. Whilst it is accepted that this is the case, it is reiterated that the Council's stance, as endorsed by Core Strategy Policy CS1, is wrong in proposing a Borough-wide restriction on any garden land, and is not in the spirit of this change of land classification within national policy. As per neighbouring Boroughs (i.e. Barnet and Hertsmere) and in line with various Appeal Inspector decisions, there should remain a site-by-site analysis of other planning issues and the surrounding character of the area to establish whether a development is appropriate, rather than an outright prohibition on development as it is on garden land. It was hoped, and is suggested, that the Development Management Policies would include such a position, to allow any development to be assessed on its wider merits and a distinction between residential garden land and other garden land, e.g. institutional uses.	planning issues and the surrounding character of the area to establish whether a development is appropriate, rather than an outright prohibition on development as it is on garden land.	d	n	gested	Examination. To change the presumption would be counter to the Core Strategy and unsound.  An SPD is to be produced to clarify what is and is not garden land development.
10	72	Preston Bennett	Policy 2		The overall objectives of this policy are supported. However, it is suggested that it is made clear that in some circumstances when	However, it is suggested that it is made clear that in some circumstances when converting	Not Specified	Non Given	Non Suggest	The requirement comes from the London Plan. Harrow's Residential Design Guide contains guidance that

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					converting buildings to residential it may not be possible to meet all Lifetime Homes considerations. As has been accepted when appropriate previously in Harrow, the policy should make clear that conversion schemes should strive to meet as many Lifetime criteria as possible, but with the understanding that there must be a degree of flexibility where is can be demonstrated that not all can be met (for identified and justified reasons).	buildings to residential it may not be possible to meet all Lifetime Homes considerations.			ed	acknowledges flexibility may be required on certain schemes.  Paragraph 2.29 will be expanded to highlight this.
10	73	Preston Bennett	Policy 26		This policy is strongly supported particularly Part A of the policy which states that proposals for major new development will be supported where they make provision for new publically accessible open space to mitigate against current deficiencies within the Borough. Where proposals for new development can achieve this, the benefits should indeed carry significant weight when ultimately determining the relevant planning application.	None	Not Specified	None Given	None Suggested	Support noted
10	74	Preston Bennett	Policy 33		As with Policy 2 above, the general objectives and intention of this policy are fully supported, and are considered to be an appropriate and potentially effective means of ensuring both delivery of additional	there needs to be a degree of flexibility when it comes to the application of Lifetime Homes Standards, to	Not Specified	None Given	None Suggested	This is a London plan and Core Strategy requirement. Harrow's Residential Design Guide gives detail on its implementation



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>housing, and the re-use of otherwise redundant property. However, it is reiterated that there needs to be a degree of flexibility when it comes to the application of Lifetime Homes Standards, to ensure that suitable development is held back from delivery. Part B of Policy 33 states that Lifetime Homes Standards need to be complied with. As above, the onus should be on the applicant to demonstrate what standards are met, and which aren't, together with full and reasoned justification for the latter without any shortfall necessarily automatically resulting in an unacceptable proposal.</p> <p>It is also considered that this policy and / or the supporting text should take account of the new guidance issued by Government on 6<sup>th</sup> September which included specific information on 'getting empty offices into use' which will expand permitted development pursuant to such proposals.</p>	<p>ensure that suitable development is held back from delivery.</p> <p>It is also considered that this policy and / or the supporting text should take account of the new guidance issued by Government on 6<sup>th</sup> September which included specific information on 'getting empty offices into use' which will expand permitted development pursuant to such proposals.</p>				At the current time this is only a proposal. Consideration will be given to this if it is implemented.
10	75	Preston Bennett	Policy 38		We fully support the Council's stance that such facilities are to be supported where they are proposed on previously-developed land.	None	Not Specified	None Given	None Suggested	Support noted
10	76	Preston Bennett	Policy 45		The supporting text to this policy states that the test related to 'criteria b' to demonstrate that the current pub use is no longer viable	Marketing period should be 6 – 12	Not Specified	None Given	None Suggested	Agreed – change to “12 months”.

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					should include marketing evidence over a period of two years. It is considered that this is too long and has the potential to allow a property to easily fall in to a state of unviable economic repair. It is accepted that marketing (presenting a robust marketing case) over a reasonable period is appropriate, but it is strongly considered that this should be a minimum of 6 months up to 12 months, a period that is accepted as appropriate elsewhere in the DPD within policies assessing the change of use of shops (Policy 50). There is a lack of justification as to why, in the case of public houses, the marketing evidence to justify a change of use should be double that of retail uses.	months	d	n	gest ed	

**Respondent 11: RP and G Ltd on behalf of Geoffrey Simm**

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
11	77	RP and G Ltd on behalf of Geoffrey Simm	5.31		This paragraph deals with three separate subjects relevant to open space. It should be split up to aid understanding and interpretation. There are also changes that would further aid clarity. The first part of the paragraph defines what is meant by 'open space' for the purposes of the DPD. It identifies types of open space and states that they "are protected	We proposed that paragraph 5.31 be reworded and restructured as follows: 5.31 In addition to the Green Belt and Metropolitan Open Land, open spaces	Not Specified	None Given	None Suggested	The wording of this paragraph reflects the position in the adopted Core Strategy.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>irrespective of ownership". However, the specifics of ownership are rarely relevant to the merits of a planning proposal. What is relevant in this context is accessibility in terms of the degree or complete absence of access by the general public. This can be important in respect of the tests set out in the NPPF, as dealt with by the second part of paragraph 5.31. This should, though, clearly cite paragraph 74 as its source since it is important that anyone reading this should appreciate that there is a specific context in the NPPF.</p> <p>The third part of 4.31 cites Policy 7.18 of the London Plan. This is clearly more restrictive than the NPPF in its scope for justifying the loss of open space. Since it predates the NPPF it should be made clear that it has less weight as a policy consideration as a consequence.</p>	<p>that are of local importance are identified on the Harrow Policies Map. They comprise parks and gardens, play areas, amenity spaces, natural conservation sites, playing pitches and other outdoor sports grounds, allotments and cemeteries/churchyards and are protected irrespective of accessibility.</p> <p>5.31a The National Planning Policy Framework (2012) paragraph 74 states that existing open space, sport and recreation facilities should not be built on unless one of three criteria are met: the site should clearly be surplus to requirements, or the loss would be replaced by equivalent or better</p>				<p>Harrow's local assessment shows that there is a significant qualitative short fall in accessible open space to meet the needs of the Borough's population, and for this reason the Core Strategy establishes a presumption against any net loss of open space, and with the exception of small scale ancillary facilities, resists development on open spaces. The policies in</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						<p>provision in terms of quantity and quality, or the need for and benefits of the development clearly outweigh the loss.</p> <p>5.31b Policy 7.18 of the London Plan resists the loss of local open space unless equivalent or better quality provision is made within the local catchment area.</p> <p>However, the NPPF provides additional criteria against which to assess the loss of open space. Since the NPPF post-dates the adoption of the London Plan more weight can be given to these additional criteria.</p>				<p>this section give effect to the Core Strategy</p> <p>However the paragraph will be re-worded for clarity.</p>
11	78	RP and G Ltd on behalf of Geoffrey Simm	Policy 25		Part A of this policy states that land identified as open space on the Proposals Map will not be released for development and offers no exceptions to this. Part B states that the reconfiguration of open space will be	We proposed that Policy 25 be reworded and restructured as follows:	Not Specified	None Given	None Suggested	There is no need to repeat NPPF policy here. The purpose of policy 25 is to give effect to Harrow's Core Stratgey

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>supported where it meets four sub-criteria.</p> <p>Distinguishing between total loss and reconfiguration in this manner in contrary to paragraph 74 of the NPPF, the criteria of which allow the total loss in principle of an open space facility to development. Part A should therefore be subject to the criteria of paragraph 74.</p> <p>The criteria of Part B are more properly to be considered as a local interpretation of the effect of paragraph 74. In this context criteria 'b' is ambiguous and ultimately contrary to paragraph 74. This is because the latter allows the possibility of equivalent or better provision in terms of quantity and quality, which could see variations in the size, type and use of open space and any replacement or enhanced off-site facility. Given these variables there are a wide range of possible outcomes, set against which a requirement for 'no net loss' is too vague at the very least, and also contrary to paragraph 74. For example, it could be crudely interpreted as meaning that a 1ha open space requires exactly 1ha of open space to be retained in some manner, but the mere area of open space involved is not the only measure of quantity. Criteria 'b' should therefore be deleted since the NPPF criteria and others within the policy offer sufficient checks and balances.</p> <p>Part E states that "Proposals that would be harmful to open space, having regard to the criteria set out in this policy, will be refused."</p>	<p>A. Land identified as open space on the Harrow Policies Map will not be released for development unless one of the following criteria are met:</p> <ul style="list-style-type: none"> <li>a. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</li> <li>b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</li> <li>c. the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</li> </ul> <p>B. The reconfiguration of land identified as</p>			ed	<p>which is consistent with the NPPF and justified by robust evidence.</p> <p>The policy deals with 2 separate issues, reconfiguration and ancillary development in the context of a presumption against loss established in the Core Strategy</p>

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Rea son	Cha nge	Council's Comments / Response
					<p>Part F adds: "Proposals for the inappropriate change of use of open space will be resisted." These are vague and, in any case, redundant tests. The question of whether a proposal will be harmful to open space or inappropriate as a change of use will already have been answered by having regard to the other four parts of the policy (as relevant to the nature of any particular proposal), as well as other policies of the DPD. Parts E and F should therefore be deleted.</p>	<p>open space on the Harrow Policies Map will be supported where:</p> <ul style="list-style-type: none"> <li>a. the reconfiguration is part of a comprehensive, deliverable scheme;</li> <li>b. the reconfiguration would achieve enhancements to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure a viable future for the open space; and</li> <li>c. the release would not be detrimental to any environmental function performed by the existing open space.</li> </ul> <p>C. proposals for ancillary development on land identified as open space on the Harrow Policies Map will be supported where:</p> <ul style="list-style-type: none"> <li>a. it is necessary to</li> </ul>				

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						<p>or would facilitate the proper functioning of the open space;</p> <p>b. it is ancillary to the use(s) of the open space;</p> <p>c. it would be appropriate in scale;</p> <p>d. it would not detract from the open character of the site or surroundings;</p> <p>e. it would not be detrimental to any other function that the open space performs; and</p> <p>f. it would contribute positively to the setting and quality of the open space.</p> <p>D. Proposals that would secure the future of existing ancillary buildings on open space will be supported where:</p> <p>a. there would be no loss of necessary capacity for the proper functioning of the open space; and</p> <p>b. there would be no</p>				

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						harm to the quality or proper functioning of the open space as a result of the proposal.				

**Respondent 12: RPS on behalf of Pearson Pension Property Fund**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
12	79	RPS on behalf of Pearson Pension Property Fund	General		See PDF Letter for general background on representations	None	Not Specified	None Given	None Suggested	Noted
12	80	RPS on behalf of Pearson Pension Property Fund	Policy 2	No	The policy states that the location, design and layout of development contribute towards the creation of lifetime neighbourhoods, which is considered acceptable by RPS. It is also accepted that non-residential development is to be appropriately located so as to sustain Town Centres, neighbourhood parades and local employment. RPS, however, considers that development and change of use proposals, in particular for retail uses, in sustainable locations outside	The Core Strategy should include reference that development and change of use proposals, in particular for retail uses, in sustainable locations outside of town and local centres would be supported by the	Not Specified	None Given	None Suggested	Harrow's Core Strategy directs retail and services to town centres in accordance with the National planning Policy Framework



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					of town and local centres, should be supported by the Council, where they would enhance retail choices and employment opportunities in these areas without causing a detrimental impact to the retail uses within the centres. This in particular is important for the DMP document to comply with the guidance within the NPPF and presumption in favour of sustainable development. The inclusion in the policy that non-residential uses are to be accessible to all is supported.	Council, where they would enhance retail choices and employment opportunities in these areas without causing a detrimental impact to the retail uses within the centres.				
12	81	RPS on behalf of Pearson Pension Property Fund	8.5	No	<p>Paragraph 8.5 of the draft DMP consultation document refers to the National Planning Policy Framework's (NPPF) requirement for a sequential approach to locating retail and leisure developments, firstly considering sites within town centres, followed by edge-of-centre locations. The paragraph states that only if suitable sites within town or edge-of-centre locations cannot be found then out-of-centre locations will be considered to ensure that development needs are met.</p> <p>RPS considers that for the DPD to comply with the Government's guidance within the NPPF and the 'presumption in favour of sustainable development', appropriate and sustainable sites in out-of-centre locations which would support local communities should be considered for retail development to contribute towards the Borough's needs.</p>	Paragraph 8.5 of the DMP document should be reworded to acknowledge that some further out-of-centre sites are required to meet the retail needs to support the predicted future population increase of Harrow.	Not Specified	None Given	None Suggested	The retail note at the end of this schedule sets out how the pipeline supply of retail development and allocations in the Site Allocations DPD and the AAP meets and exceeds the projected need for additional convenience retail floorspace over the period 2009-2025, and how the need for comparison retail floorspace will be met over the short to medium term (2009-2020) and the policy provisions made in the event of longer term need being realised (2020-2025).

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>The NPPF recognises out-of-centre sites as legitimate locations for retail use in the absence of suitable and available town centre or edge-of-centre sites. The DMP document should similarly recognise the contribution that such sites can make to meeting retail floorspace needs.</p> <p>As the site currently has consent for A1 retail and the sale of non-food comparison goods, is adjacent to an existing foodstore and other employment units within the South Harrow Industrial Estate, the site is considered to be an appropriate location for additional retail sales of a convenience or comparison nature.</p> <p>The 2009 Harrow Retail Study undertaken by NLP, which updates the 2006 Study, predicts that there will be a retail requirement of 38,912sqm comparison and 5,261sqm convenience floorspace by 2025. However, as indicated in the Site Allocations DPD, this excluded the following approvals:</p> <ul style="list-style-type: none"> <li>□ Extension of Tesco store, Station Road of 2,368sqm net comparison and 651sqm net convenience floorspace;</li> <li>□ Neptune Point supermarket of 3,440sqm gross convenience and 560sqm gross comparison floorspace; and</li> <li>□ 1,000sqm A1-A5 uses at Harrow View, Wealdstone.</li> </ul> <p>Despite these proposed developments there is still a significant requirement required for the plan period.</p> <p>Proposed site allocations provide a total of 8,500sqm retail floorspace. It is therefore evident that a greater number of sites are</p>					<p>In response to this contributor's representation to the Site Allocations DPD pre-submission consultation, the introductory text of that DPD has been revised to provide greater clarity on how retail development needs are to be met.</p> <p>The Council can demonstrate a sufficient supply of pipeline and allocated sites to meet and exceed the projected need for convenience retail floorspace over the period 2009-2025. Policy 46(B) of the Development Management Policies DPD sets out criteria for the consideration of new retail development in out of centre locations and therefore allows for any retail development associated with the higher (long range) comparison floorspace projections – in the event that they are sustained following a review of the Retail Study - to come</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					required to ensure both convenience and comparison goods floorspace requirements of approximately 44,173sqm by 2025 can be met. RPS, therefore, considers that the Retail Park should be recognised by the Council as an appropriate location for additional retail development, which would not cause any harm to neighbouring District centres, and should be considered as a preferable out-of-centre site where additional retail use is supported.					forward during the plan period. <b>No change.</b>
12	82	RPS on behalf of Pearson Pension Property Fund	8.8	No	Paragraph 8.8 of the draft DMP consultation document provides justification for Policy 4.6, and refers to the sequential approach for site selection for retail proposals. The paragraph indicates that sites within 300m of Primary Shopping Areas or within the boundary of town centres are the most sequentially preferable locations for development. It also states that proposals in edge-of-centre or out-of-centre locations need to demonstrate that there are no other sequentially preferable sites available. Whilst RPS agrees that a sequential approach to retail development should be applied, sustainable sites outside of the town or district centres which are already within retail use should not be discounted by the Council as suitable development sites. The National Planning Policy Framework recognises that out-of-centre sites are appropriate for retail development if there are no other suitable in- or edge-of-centre	The DMP document should be flexible in relation to retail site selection as there is an identified future need for approximately 44,173sqm convenience and comparison goods floorspace to 2026, which cannot be currently met through existing allocations and commitments. Therefore, additional sites outside of the sequentially preferable locations of District Centres and Primary	Not Specified	None Given	None Suggested	The retail note at the end of this schedule sets out how the pipeline supply of retail development and allocations in the Site Allocations DPD and the AAP meets and exceeds the projected need for additional convenience retail floorspace over the period 2009-2025, and how the need for comparison retail floorspace will be met over the short to medium term (2009-2020) and the policy provisions made in the event of longer term need being realised (2020-2025).  The relaxation of existing

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>locations available to meet identified retail needs.</p> <p>In relation to this, RPS considers that the Northolt Road Retail Park, which is more than 300m from the South Harrow Primary Shopping Area but which has consent for A1 use and non-food comparison goods and is adjacent to an existing foodstore, should be recognised as a suitable location for contributing towards the Borough's convenience goods floorspace needs.</p> <p>It is evident that the Council require additional retail floorspace to be delivered in the plan period to meet the predicted need of approximately 44,173sqm convenience and comparison goods floorspace, than is currently available to meet the identified requirements of Harrow.</p> <p>As the Retail Park is 340m from the District Centre and only approximately 400m from the Primary Shopping Area, and due to the sites current and adjacent uses, it should be considered as a preferable out-of-centre site where additional retail use is supported.</p>	Shopping Areas, such as the Northolt Road Retail Park, should be recognised as suitable and sustainable locations for contributing towards this required floorspace. These sites should be considered favourably by the Council for additional retail development rather than only				controls over retail sales on the site should be pursued through the planning application process (with appropriate impact assessment) and not the development plan process. <b>No change.</b>
12	83	RPS on behalf of Pearson Pension Property Fund	8.9	No	Paragraph 8.9 refers to out-of-centre retail developments posing the greatest threat to the vitality and viability of Town Centres, particularly comparison goods retailing. The National Planning Policy Framework recognises that out-of-centre sites are appropriate for retail development if there are no other suitable in- or edge-of-centre locations available to meet identified retail needs and that such need must be met in	Additional sites outside of District Centres and Primary Shopping Areas, such as the Retail Park, should be recognised as suitable and sustainable locations for	Not Specified	None Given	None Suggested	In line with national planning policy, the DPD seeks to direct new retail development first to in-centre, and then edge of centre locations. Also consistent with national planning policy, Policy 46 of the DPD sets out criteria for considering

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>full. RPS therefore considers that the Council should not resist development outside of town and district centres, particularly where retail uses already exist. It is evident that the Council requires additional retail floorspace to be delivered in the plan period to meet the predicted need of approximately 44,173sqm convenience and comparison goods floorspace, and to support the anticipated future population growth of Harrow. Therefore, it is considered that the Council should adopt a more flexible approach to retail site selection to enable additional sustainable sites to come forward to meet this predicted need.</p> <p>RPS considers that the Northolt Road Retail Park, which is 400m from the South Harrow Primary Shopping Area, but which has consent for non-food open A1 use, and is adjacent to an existing foodstore, should be recognised as a preferable out-ofcentre location. The Retail Park currently has consent for the sale of non-food comparison goods, and it is considered than additional and replacement food sales would not cause a significant impact in relation to traffic to the site, and technical reports could be undertaken to demonstrate this. Therefore, it is considered that the site should be recognised due to its good accessibility and proximity to other retail uses and the District Centre, as a preferable location for contributing towards the</p>	<p>contributing towards the comparison and convenience goods floorspace required for the plan period. The DMP document should acknowledge that the out-of-centre sites are legitimate and suitable in providing retail floorspace, as indicated in the National Planning Policy Framework, when there is a lack of in-and edge-of-centre locations available to meet identified retail floorspace requirements. The Retail Park therefore should be considered favourably by the Council for additional retail development rather than only being considered where no other sequentially</p>				<p>out of centre proposals. Paragraph 8.9 of the DPD states that out of centre development will be resisted except as a last resort to meeting need for additional retail capacity. The council considers that this is consistent with paragraph 23 of the NPPF which states that local planning authorities should '<i>set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres</i>'.  The retail note at the end of this schedule sets out how the pipeline supply of retail development and allocations in the Site Allocations DPD and the AAP meets and exceeds the projected need for additional convenience retail floorspace over the period 2009-2025, and how the need for comparison retail floorspace will be met over the short to medium term (2009-2020) and the</p>

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Boroughs convenience goods floorspace needs, or for additional comparison goods floorspace.	preferable sites are available.				<p>policy provisions made in the event of longer term need being realised (2020-2025).</p> <p>The site is out of centre and in the Council's view it would be inappropriate to identify it for development within the retail development policy or reasoned justification of the DPD. <b>No change.</b></p>
12	84	RPS on behalf of Pearson Pension Property Fund	Policy 46	No	<p>Whilst RPS agrees that new retail proposals are consistent with the use and function of centres, the Borough's spatial strategy, and a sequential approach to site selection, it is considered to be inappropriate for sites particularly in out-of-centre locations to be discounted for retail uses where there is a recognised need for additional retail floorspace to be provided.</p> <p>It has been demonstrated that the Council requires 38,912sqm net comparison and 5,261sqm net convenience floorspace by 2025, as the 2009 Harrow Retail Study predicts. However, this is a year short of the plan period, and the Council only has a supply of approximately 16,000sqm retail floorspace through existing commitments and proposed site allocations as indicated in the Site Allocations Development Plan Document.</p>	The DMP document should be more flexible in terms of consideration of less sequentially preferable out-of-centre sites, particularly which already are in retail use, to ensure that the predicted future retail floorspace needs to 2026 are met.	Not Specified	None Given	None Suggested	The retail note at the end of this schedule sets out how the pipeline supply of retail development and allocations in the Site Allocations DPD and the AAP meets and exceeds the projected need for additional convenience retail floorspace over the period 2009-2025, and how the need for comparison retail floorspace will be met over the short to medium term (2009-2020) and the policy provisions made in the event of longer term need being realised (2020-2025).

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Rea son	Cha nge	Council's Comments / Response	
					<p>Whilst the Harrow and Wealdstone Area Action Plan proposes to allocate a number of sites to contribute towards comparison retail sales and additional convenience, the exact amount of both comparison and convenience floorspace which could be delivered has not been determined. It is unclear whether the Council could accommodate all of the required 44,173sqm on the proposed site allocations and existing commitments, and therefore additional sites should be considered in addition to these to ensure that the Borough's future retail needs are met. RPS considers that a more flexible approach to retail site selection should be encouraged by the Council to enable suitable sites to come forward in less sequentially preferable locations to meet these retail needs, such as out-of-centre sites. This is so that the DMP document complies with the National Planning Policy Framework, which recognises that out-of-centre sites are suitable for retail development where there is a lack of other sites available.</p> <p>The Northolt Road Retail Park is in close proximity to South Harrow District Centre and the Primary Shopping Area. The site currently has consent for the sale of nonfood open A1 use, and it is considered that additional food sales would not cause a significant impact in relation to traffic to the site.</p> <p>Therefore, it is considered that the site should be recognised due to its good accessibility and proximity to other retail</p>						<p>Policy 47 provides robust criteria for new retail development to come forward in out of centre locations only when a search for in-centre and then edge-of-centre sites has been exhausted. The Council considers this approach to be consistent with the NPPF.</p> <p>The site is out of centre and in the Council's view it would be inappropriate to identify it for development within the retail development policy or reasoned justification of the DPD.</p> <p><b>No change.</b></p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					uses and the District Centre, as a preferable out-of-centre location for contributing towards the Boroughs comparison and convenience goods floorspace needs.					

### Respondent 13: Stewart Braddock – Croft Partnership

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
13	85	Stewart Braddock – Croft Partnership	Policy 11	No	This policy is in conflict with statutory planning law and should be amended. It is wrong in law to apply the same protections afforded to statutory listed properties to those which are locally listed. Statutory listed buildings are objectively assessed by English Heritage as being of architectural or historic interest and which are then included by the Department of Culture Media and Sport (DCMS) on the statutory list under the Planning (Listed Buildings and Conservation Areas) Act 1990. Buildings which are not included in the statutory list are, by definition, not of listable quality and therefore are not afforded the same statutory protection. It is therefore wrong to apply a policy for	Amended policy should read "When assessing proposals affecting locally listed buildings, including those that would involve demolition or compromise a building's setting, particular consideration will be given to preserving or enhancing their local architectural or historic significance. " END	No	This policy is in conflict with statutory planning law and should be amended. It is wrong in law to apply the same protections afforded to statutory listed properties to those which are locally listed. Statutory listed buildings are objectively assessed by English Heritage as being of architectural or historic interest and which are then	"When assessing proposals affecting locally listed buildings, including those that would involve demolition or compromise a building's setting, particular consideration will be given to preserving	This part of the policy will be removed, as it is agreed that is not legal. Consequential amendments will be made to the text.



ID	Re p No	Organisa tion Details	Para	Sou nd	Reason	Change	Leg al	Reason	Change	Council's Comments / Response
					reinstatement of a locally listed building after demolition as this would indicate that a locally listed building is subject to the same protections afforded to a statutory building which in law it does not.			included by the Department of Culture Media and Sport (DCMS) on the statutory list under the Planning (Listed Buildings and Conservation Areas) Act 1990. Buildings which are not included in the statutory list are, by definition, not of listable quality and therefore are not afforded the same statutory protection. It is therefore wrong to apply a policy for reinstatement of a locally listed building after demolition as this would indicate that the building is subject to the same protections afforded to a statutory building which in law it does not.	or enhancing their local architectural or historic significance ." END	

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
13	85	Stewart Braddock – Croft Partnership	7.46	No	The period for marketing should be reduced to a minimum of 12 months. Lack of Viability will be proven within this timescale and 24 months is unjustified.	Proposals for the change of use or redevelopment to uses that do not make provision for evening economy uses or community uses, as appropriate under criterion (a), will only be accepted where it has been demonstrated that the pub is no longer economically viable and that reasonable attempts have been made to market the site to other operators for re-use as a public house. Supporting evidence should include details of the appointment of a property consultant/estate agent to handle the marketing of the property, and records of where and how the property has been marketed for a minimum of one year.	Not Specified	None Given	None Suggested	Agreed – change to “12 months”.

Respondent 14: Thames Water

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
14	86	Thames Water	Policy 17	No	<p>We do not object to the policy in principle, but consider that it does not adequately cover sewerage and water infrastructure provision, which is essential to all development, and focuses mainly on SuDS. We support the use of sustainable drainage systems in appropriate circumstances. However, they are only one factor which affects water quality. A key factor which affects water quality is waste water treatment as treated effluent is normally discharged into the nearby watercourse. Therefore, sufficient waste water treatment infrastructure is required to service development to protect water quality.</p> <p>We support Part B (b) of the Policy which requires separation of surface and foul water systems.</p> <p>Regarding the remainder of the policy, a key sustainability objective for the preparation of the Local Development Framework/Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the new National Planning Policy Framework (NPPF), March 2012, states:</p>	<p>It is therefore important that Policy 17 is amended to specifically refer to water and sewerage/wastewater infrastructure or there should be a new Policy along the lines of:</p> <p><b><u>Proposed Addition to Infrastructure Policy 17 or Text for new Water/Wastewater Infrastructure Policy</u></b></p> <p><b>Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:</b></p> <ol style="list-style-type: none"> <li><b>sufficient capacity already exists or</b></li> <li><b>extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.</b></li> </ol> <p><b>When there is a capacity problem and improvements</b></p>	Not Specified	None Given	None Suggested	The Core Strategy already includes Core Policy CS1 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. Core Policy CS1 Z covers all social and physical infrastructure applicable to development including water supply and sewerage infrastructure. The Council does not consider it necessary to repeat the requirements of this Core Policy again in the Development Management DPD, especially where the effect would be to single out one type of

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p><b><i>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></b></p> <p>Paragraph 162 of the NPPF relates to infrastructure and states:</p> <p><b><i>“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</i></b></p> <p>Policy 5.14 of The London Plan, July 2011 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and states:</p> <p><b><i>“Strategic</i></b></p> <p><b><i>A - The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local authorities to:</i></b></p> <p><b><i>a) ensure that London has</i></b></p>	<p>in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development.”.</p> <p>Text along the following lines should be added to the Core Strategy to support the above proposed Policy :</p> <p><b><i>“The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the 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</i></b></p>				<p>infrastructure requirement, potentially giving it priority over all other infrastructure capacity considerations, such as transport, education, healthcare etc, which the Council considers should have equal weight.</p> <p>However, in light of the representations made by this respondent, it is proposed to modify the reasoned justification to Policy 17 to draw attention to the allocated development sites where Thames Water had raised concerns regarding waste water capacity and to highlight the need for the</p>

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reason	Change	Council's Comments / Response
					<p>adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth and climate change</p> <p>b) protect and improve water quality having regard to the Thames River Basin Management Plan</p> <p><b>Planning Decisions</b></p> <p>B - Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.</p> <p>C - Development proposals to upgrade London's sewage (including sludge) treatment capacity should be supported provided they utilize best available techniques and energy capture.</p> <p><b>LDF preparation</b></p>	<p><b>lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development."</b></p> <p>Such a policy is important as sewerage and water undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.</p>				<p>developer to prepare a drainage strategy in liaison with Thames Water, the purpose of which is to model the network capacity and ensure that, if mitigation is required, this is undertaken ahead of occupation of the development. The Council therefore considers that the combination of Core Policy CS1 Z and paragraph 4.20 of the Development Management Policies DPD adequately addresses the respondent's concerns.</p> <p><b>No change</b></p>

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reason	Change	Council's Comments / Response
					<p><i>E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel."</i></p> <p>Policy 5.15 of the London Plan relates to water use and supplies and states:</p> <p><b>“Strategic</b>  <i>A The Mayor will work in partnership with appropriate agencies within London and adjoining regional and local planning authorities to protect and conserve water supplies and resources in order to secure London's needs in a sustainable manner by:</i>  <i>a minimising use of mains water</i>  <i>b reaching cost-effective minimum leakage levels</i>  <i>c in conjunction with demand side measures, promoting the provision of additional sustainable water resources in a timely and efficient manner, reducing the water supply deficit and achieving security of supply in London</i>  <i>d minimising the amount of</i></p>					

ID	Re p No .	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reason	Change	Council's Comments / Response
					<p><i>energy consumed in water supply</i>  <i>e promoting the use of rainwater harvesting and using dual potable and grey water recycling systems, where they are energy and cost-effective</i>  <i>f maintaining and upgrading water supply infrastructure</i>  <i>g ensuring the water supplied will not give rise to likely significant adverse effects to the environment, particularly designated sites of European importance for nature conservation.</i></p> <p><b>Planning decisions</b>  <i>B Development should minimise the use of mains water by:</i>  <i>a incorporating water saving measures and equipment</i>  <i>b designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day.</i></p> <p><i>C New development for sustainable water supply infrastructure, which has been selected within water companies' Water</i></p>					

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reason	Change	Council's Comments / Response
					<p><i>Resource Management Plans, will be supported."</i></p> <p>We consider that the Development Management Document must specifically cover the key issue of the provision of water and sewerage infrastructure to service development in policy to accord with the London Plan. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of "soundness".</p> <p>Notwithstanding the preparation of a separate Infrastructure Delivery Plan, a separate policy on waste water and water supply infrastructure is necessary because it will not be possible to identify all of the water supply and wastewater/sewerage infrastructure required over the plan period due to the way we are regulated and plan in 5 year periods.</p> <p>The water companies' investment</p>					



ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reason	Change	Council's Comments / Response
					<p>programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP5 period which runs from 1<sup>st</sup> April 2010 to 31<sup>st</sup> March 2015 and does not therefore cover the whole Local Plan period. AMP6 will cover the period from 1<sup>st</sup> April 2015 to 31<sup>st</sup> March 2020, but we have not yet submitted our business plan for this period. Our draft Business Plan for AMP6 will be submitted to Ofwat in August 2013.</p> <p>Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements can not be required to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p> <p>It is important that developers demonstrate that adequate capacity exists both on and off the site to</p>					

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reason	Change	Council's Comments / Response
					serve the 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 water & sewerage infrastructure. Where there is a capacity problem 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					
14	87	Thames Water	Policy 16	No	<p>Thames Water generally support the policy, but consider that it could be improved in relation to flooding from sewers as pluvial flooding is particularly significant in urban areas.</p> <p>The technical Guidance to the National Planning Policy Framework which retains key elements of PPS25: Development and Flood Risk states that a sequential approach should be used by local planning authorities in areas to be at risk from forms of flooding other than from river and</p>	The policy should make specific reference to flooding from sewers and developers should be required to show that as a result of their development that Pluvial flooding will not occur either on or off site further down the catchment.	Not Specified	None Given	None Suggested	<p>This is dealt with in part A, where it references 'all sources'.</p> <p>However paragraph 4.4 will be amended to include reference to the types of flooding as mentioned</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>sea which includes "Flooding from Sewers".</p> <p>Policy 16 should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development.</p> <p>It is vital that sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided. It is also important not to underestimate the time required to deliver necessary infrastructure, for example:</p> <ul style="list-style-type: none"> <li>- local network upgrades take around 18 months</li> <li>- sewage treatment works upgrades can take 3-5 years</li> </ul> <p><i>This therefore increases the importance for Thames Water's proposed changes to Policy 17 regarding sewerage/waste water infrastructure to be taken into account.</i></p>					

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response

**Respondent 15: The Pinner Association**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
15	88	Pinner Association	2.4		<p>Chapter 2 Character and Amenity, paragraph 2.4, of the document states:            "... The National Planning Policy Framework (NPPF) sets out the matters to be considered when assessing housing design quality and its definition of previously-developed land specifically excludes residential gardens. The policies in this chapter seek to enable effective use to be made of previously-developed land and to provide an appropriate level of protection for Harrow's residential gardens..."</p> <p>In the opinion of The Pinner Association "an appropriate level of protection for Harrow's residential gardens" is a presumption against development on residential garden land. This is to protect the amenity of current and</p>	This presumption against development on residential garden land should apply to all relevant policies in the Harrow Development Management Policies DPD.	Not Specified	None Given	None Suggested	This presumption against development on garden land is set out in the Core Strategy. An SPD will be produced to further elaborate on the policy.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					future residents and to ensure the continuation of the bio-diversity and other benefits of residential garden land. This presumption against development on residential garden land should apply to all relevant policies in the Harrow Development Management Policies DPD.					
15	89	Pinner Association	Policy 15	Yes	The Pinner Association supports the extra protection proposed for Pinner Memorial Park under Policy 15: 3.96 In addition to the four formally designated historic parks and gardens, the Council has begun compiling a local register of Parks and Gardens which are considered to contribute to the character and local heritage of their area. The list currently comprises two sites:" including: "Pinner Memorial Park: grounds landscaped around West House, former home of Nelson's grandson and later location of the Book of Remembrance. Grounds and house, purchased through public subscription as a living memorial, for the public to enjoy, of World War II."	None	Not Specified	None Given	None Suggested	Support Noted

**Respondent 16: Drivers Jonas Deloitte on behalf of RNOH**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
16	90	Drivers Jonas Deloitte on behalf of RNOH	Policy 23	Yes	<p>Policy 23 refers to the redevelopment or infilling of strategic and other previously-developed sites in the Green Belt and Metropolitan Open Land (MOL). The Policy advises that development within the Green Belt will be supported where proposals do not have a greater impact on the openness of the site <b>having regard to:</b></p> <ul style="list-style-type: none"> <li>▪ the height of existing buildings on the site;</li> <li>▪ the proportion of the site that is already developed;</li> <li>▪ the footprint and distribution of existing buildings on the site; and,</li> <li>▪ the relationship of the proposals with any development on the site that is to be retained.</li> <li>▪ the visual amenity and character of the Green Belt and MOL;</li> <li>▪ the setting that openness provides for heritage assets within the Green Belt and MOL; and,</li> <li>▪ the contribution that the site and its surroundings make to the biodiversity.</li> </ul>	None	Not Specified	None Given	None Suggested	Support Noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>The Trust acknowledges the above criteria. It supports the wording of the policy which requires new development to 'have regard to', as apposed to 'be restricted by' the criteria. The Trust considers this approach is the correct interpretation of Green Belt policy contained within the NPPF, which does not seek to control the built form of new development in the Green Belt, but instead adopts a more flexible approach to the assessment of a development's impact on the openness of the Green Belt.</p> <p>The Trust supports the identification of the Royal National Orthopaedic Hospital as a strategic, previously-developed site within the Green Belt.</p>					
16	91	Drivers Jonas Deloitte on behalf of RNOH	Policy 24	Yes	The Trust recognises the importance of Harrow's Green Belt and Metropolitan Open Land and supports the Council's approach to 'beneficial uses' on such land. The Trust is pleased to note that draft Policy 24 recognises that development proposals can present an opportunity to enhance public access and visual amenity.	None	Not Specified	None Given	None Suggested	Support Noted
16	92	Drivers	Policy		Policy 30 'Trees and Landscaping' seeks to	Flexibility in policy to	Not	Non	Non	The Policy will be

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Jonas Deloitte on behalf of RNOH	30		secure the retention and survival of any trees that are subject to a Tree Preservation Order (TPO) or significant amenity value. At present, draft Policy 30 states that development proposals that would result in the unnecessary removal of any trees the subject of TPOs will be resisted. Whilst the Trust recognises the significance of protected trees, there are instances where it may be necessary to remove trees, even those with TPOs, in order to facilitate the delivery of more rational design solutions.	remove protected trees	Specified	Given	Suggested	amended to delete the second sentence of part A and replace it with text as a new part B for clarity. This will state "The removal of trees subject to TPOs or assessed as being of significant amenity value will only be considered acceptable where it can be demonstrated that the loss of the tree(s) is outweighed by the wider public benefits of the proposal". This will ensure flexibility where needed.
16	93	Drivers Jonas Deloitte on behalf of RNOH	Policy 53	Yes	The exceptional operational circumstances of the RNOH are considered to be sound justification for exceeding the London Plan parking standard on this site. The Trust therefore supports the flexibility of this policy in that proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements and any special safety considerations.	None	Not Specified	None Given	None Suggested	Support Noted
16	94	Drivers Jonas Deloitte on behalf of RNOH	Policy 61		The Trust acknowledges that financial contributions will be sought in the form of Planning Obligations for new development proposals. However, in light of the recently adopted Mayoral Community Infrastructure	None	Not Specified	None Given	None Suggested	The Council remains flexible in its consideration of viability matters when negotiating appropriate obligations



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Levy (CIL) and the emerging LB Harrow CIL, the Trust encourages the Council to consider development proposals within the current economic climate and recognise the financial constraints within which a number of landowners and developers are currently operating within.				ed	on development.

**Respondent 17: Greater London Authority**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	95	Greater London Authority	Paragraph 2.5	Yes	In addition to 'Secure by Design', the Council may also wish to reference the 'Safer Places' principles. These seek an integrated approach to crime prevention through passive design approaches which still promotes public permeability and legibility, which are essential for ensuring that new development appropriately connects to its surroundings, and respects local character and context.	Include references to Safer places	Yes	None Given	None Suggested	This is mostly covered in the R.J at 2.31, however an additional reference will be made for clarity
17	96	Greater London Authority	Policy 1 Achieving a High Stand	Yes	The Council is invited to replace "high standard of privacy" with "appropriate level of privacy" to promote the balance of private, semi-private, and public space in line with the principles of London Plan policies 7.3 and 7.6, and to recognise the fact that not all	replace "high standard of privacy" with "appropriate level of privacy"	Yes	None Given	None Suggested	Not agreed – the Council seeks a high standard of privacy with regards to context. Therefore it is not inconsistent with the London Plan, as the

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
			ard of Development, part C		new development and changes of use would be required to be very private.  The proposed Lifetime Neighbourhoods policy is supported. However, it would be useful to include a reference to the need for good access to services and facilities, as well as ensuring development promotes a healthy lifestyle, as these are also essential ingredients for the delivery of Lifetime Neighbourhoods.	include a reference to the need for good access to services and facilities, as well as ensuring development promotes a healthy lifestyle				London Plan policies deal with other aspects such as de-markation and design.
17	97	Greater London Authority	Policy 2 Achieving Lifetime Neighbourhoods	Yes	The proposed Lifetime Neighbourhoods policy is supported. However, it would be useful to include a reference to the need for good access to services and facilities, as well as ensuring development promotes a healthy lifestyle, as these are also essential ingredients for the delivery of Lifetime Neighbourhoods.	include a reference to the need for good access to services and facilities, as well as ensuring development promotes a healthy lifestyle	Yes	None Given	None Suggested	Agreed- reference will be added into the policy.
17	98	Greater London Authority	Paragraph 2.30	Yes	In line with comments made in representation 1 above, officers would welcome a reference to 'Safer Places' as well as 'Secure by Design' to ensure that there is a balance between security and safety, and permeability and connectivity, within neighbourhoods.	Include references to Safer places	Yes	None Given	None Suggested	This is mostly covered in the R.J at 2.31, however an additional reference will be made
17	99	Greater	Policy	Yes	The principle of using London View	Schedule 4 must	Yes	Non	Non	Grid references will be

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		London Authority	3 Protected Views and Vistas		Management Framework guidance and methodology for local views management and assessment is strongly supported. However, in order to implement the proposed height restrictions on development in certain local views, and to enable like for like assessments of impact, the supporting detail in Schedule 4 must include specifics with respect to: the exact location of the assessment point; the height of the camera position; and, the precise direction the camera should be pointing towards. Having discussed this matter with the Council, GLA officers understand this detail resides within the supporting Harrow Views Assessment. The Council is advised to carry this information forward into Schedule 4 for ease of reference.	include specifics with respect to: the exact location of the assessment point; the height of the camera position; and, the precise direction the camera should be pointing towards.		Give	Suggested	added for accuracy. An indicative height for the camera position is shown on each view cone based on OS data. It is recognized that there is a small margin of inaccuracy associated with OS data which is why the heights are shown as indicative. With regards to the precise direction of the lens, this is not definitive as the views are mainly multi-frame panoramas – it is considered that the photographs and viewcones are robust enough to enable detailed assessments as part of any planning application.
17	100	Greater London Authority	Policies 20 Decentralised Energy Systems, and 21 Renewable	Yes	In line with representations made at the previous consultation stage, the GLA supports the inclusion of energy policies with respect to promoting decentralised energy systems and renewable energy technologies. These policies will work in conjunction with the overarching approach of the Harrow Core Strategy, and strategic policy within the London Plan.  The Council's intention to ensure minor development also examines the feasibility for	However, to avoid any confusion by way of reverse inference, the Council is advised to simply state "Development proposals should..." rather than specifying a scale of development.	Yes	Non Give	Non Suggested	Agreed change. Re-word as stated for clarity.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
			wable Energy Technology		connection to decentralised energy networks, and use of renewable energy technologies, is supported in principle. However, to avoid any confusion by way of reverse inference, the Council is advised to simply state "Development proposals should..." rather than specifying a scale of development.					
17	101	Greater London Authority	Policy 23 Redevelopment of previously-developed sites within Green Belt and MOL	Yes	This policy is supported as a means of managing redevelopment at the four previously-developed sites within Green Belt/Metropolitan Open Land in the Borough. The assessment criteria are broadly supported, however, the Council is invited to consider whether the inclusion of a reference to development floorspace, under part A,c. of this policy, would provide an additional tool for assessing proposals.	The Council is invited to consider whether the inclusion of a reference to development floorspace, under part A,c. of this policy, would provide an additional tool for assessing proposals.	Yes	None Given	None Suggested	The Council believes that floorspace is not a good indicator on openness, as the NPPF removed this indicator
17	102	Greater London Authority	Policy 26	Yes	This policy is supported, however, in addition to the Harrow Green Grid, the Council is invited to make reference in supporting text to the All London Green Grid SPG, which was published in March 2012.	Make reference in supporting text to the All London Green Grid SPG, which was published in March 2012.	Yes	None Given	None Suggested	This reference will be added to paragraph 5.47 for accuracy.
17	103	Greater London	Policy 29	Yes	This policy is supported, however, for referencing purposes the Council should	For referencing purposes the	Yes	None	None	Reference to the document will be added

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Leg al	Rea son	Cha nge	Council's Comments / Response
		Authority	Pinner Chalk Mines		note that revised strategic guidance "Green infrastructure and open environments: London's foundations: Protecting the geodiversity of the capital" was published in March 2012.	Council should note that revised strategic guidance "Green infrastructure and open environments: London's foundations: Protecting the geodiversity of the capital" was published in March 2012.		Give n	Sug gest ed	for accuracy.
17	104	Greater London Authority	Policy 30 Trees and Landscaping	Yes	This policy is supported, however, the Council is advised that in July 2012 the Mayor published Green infrastructure & open environments: Preparing borough tree and woodland strategies SPG. The Council may wish to include a reference to this strategic guidance within the supporting text to this policy.	The Council is advised that in July 2012 the Mayor published Green infrastructure & open environments: Preparing borough tree and woodland strategies SPG. The Council may wish to include a reference to this strategic guidance	Yes	Non e Give n	Non e Sug gest ed	Reference will be added for users information.
17	105	Greater London Authority	Policy 32 Housing Mix	Yes	Officers note that the Council intends to prepare a Planning Obligations SPD which will include details of the target affordable housing mix to be sought as part of private residential development schemes. Officers also note that the target mix will be informed by the Council's Housing Strategy, which will	None	Yes	Non e Give n	Non e Sug gest ed	Noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					undergo regular review. Policy 32 effectively states that an appropriate mix of housing will be determined having regard to the Planning Obligations SPD, the need to prioritise family housing, and the site's characteristics and context. As written, Policy 32 is in general conformity with the London Plan. However, the Council is advised that, for the future Planning Obligations SPD to be in general conformity with the London Plan, it must not compromise operation of the affordable rent product by setting out threshold rent/income levels. The same principles also apply to the Council's Housing Strategy and Tenancy Strategy referred to in paragraph 6.5 of this chapter.					
17	106	Greater London Authority	Policy 33 Office conversions	Yes	This policy is supported as a means of managing the Borough's supply of office space outside of the Harrow and Wealdstone Intensification Area, and, where appropriate, promoting redevelopment/conversion for residential uses.	None	Yes	None Given	None Suggested	Support Noted
17	107	Greater London Authority	Policy 37 Children and Young People's Play Facilities	Yes	This policy is supported. However, for referencing purposes the Council should note that revised draft strategic guidance "Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation" was published in February 2012.	For referencing purposes the Council should note that revised draft strategic guidance "Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation"	Yes	None Given	None Suggested	Reference to be added for clarity

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
			es			was published in February 2012.				
17	108	Greater London Authority	Policy 40 Supporting Economic Activity and Development	Yes	The promotion of appropriate Industrial Business Park uses within the Honey Pot Lane SIL is supported.	None	Yes	None Given	None Suggested	Support Noted
17	109	Greater London Authority	Policy 44 Hotel and Tourism Development	Yes	In line with previous representations, the inclusion of the strategic target that hotels should achieve a minimum 10% provision of wheelchair accessible rooms is supported.	None	Yes	None Given	None Suggested	Support Noted
17	110	Greater London Authority	Policies 46-52	Yes	Supported, no specific comments.	None	Yes	None Given	None Suggested	Support Noted
17	111	Greater London Authority	Policy 53 Parking	Yes	This policy is supported. Specific reference to London Plan maximum car parking standards, electric vehicle charging points and car clubs is welcomed.	None	Yes	None Given	None Suggested	Support Noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
			standards					n	ed	
17	112	Greater London Authority	Policy 54 Transport assessments and travel plans	Yes	The reference to strategic principles and TfL guidance within London Plan Policy 6.3 is supported. However, the Council is invited to specifically reference the importance of submitting construction logistics plans and delivery and servicing plans within the supporting text to this policy.	The Council is invited to specifically reference the importance of submitting construction logistics plans and delivery and servicing plans within the supporting text to this policy.	Yes	None Given	None Suggested	Agreed – amend text at 9.16 to refer to submitting construction logistic plans and delivery and servicing plans.
17	113	Greater London Authority	Policy 55 Servicing	Yes	It is noted that this policy does not address freight transport. In line with London Plan Policy 6.14, officers would welcome a policy/part policy which would promote sustainable freight transport, and encourage uptake of the Freight Operators Recognition Scheme. New development should minimise the impact of freight through the submission of construction logistics plans and delivery & servicing plans (refer to representation 19 in this appendix). Where appropriate, the transfer of freight by rail and water should be strongly encouraged.	In line with London Plan Policy 6.14, officers would welcome a policy/part policy which would promote sustainable freight transport, and encourage uptake of the Freight Operators Recognition Scheme.	Yes	None Given	None Suggested	Freight infrastructure is not a significant strategic issue in Harrow, and therefore the Council feels that London Plan policy 6.14 B will be adequate to determine any such application.
17	114	Greater London Authority	General comments	Yes	Officers note that the DPD does not appear to include a specific policy with respect to safeguarding land for transport. Whilst officers would not necessarily expect this DPD to be used to safeguard land, TfL would welcome a reference that the Council would	TfL would welcome a reference that the Council would refuse proposals where they would conflict with London	Yes	None Given	None Suggested	This is an omission and text will be added to the justification in paragraph 2.26 stating that proposals that would prejudice land used for



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					refuse proposals where they would conflict with London Plan policies on safeguarding land for transport.	Plan policies on safeguarding land for transport.				transport will be refused
17	115	Greater London Authority	General comments	Yes	No mention of walking and cycling appears to be made by the transport section of this DPD. Whilst it is acknowledged that Policy 2 provides references to creating and strengthening walking and cycling routes, TfL recommends that this is reinforced in relation to transport, with specific mention of measures such as the Strategic Walking Network and Legible London, and the cycle standards and facilities promoted by London Plan Policy 6.9.	Whilst it is acknowledged that Policy 2 provides references to creating and strengthening walking and cycling routes, TfL recommends that this is reinforced in relation to transport, with specific mention of measures such as the Strategic Walking Network and Legible London, and the cycle standards and facilities promoted by London Plan Policy 6.9.	Yes	None Given	None Suggested	A reference will be inserted in Policy 54 to state (see policy 2C) as this is where the creation of lifetime neighborhoods, including walking and cycling are dealt with for clarity.  Reference to Legible London and strategic walking network will be added to the reasoned justification at 2.34
17	116	Greater London Authority	General comments	Yes	The DPD appears to make only limited reference to promoting the bus network. TfL would welcome the inclusion of additional detail such as the need to: allocate road space; ensure good access to bus stops; and, implement TfL's Accessible Bus Stop Design Guidance.	TfL would welcome the inclusion of additional detail such as the need to: allocate road space; ensure good access to bus stops; and, implement TfL's	Yes	None Given	None Suggested	Accessible bus stops are dealt with in Policy 2D. General access improvements are also covered in this policy

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						Accessible Bus Stop Design Guidance.				
17	117	Greater London Authority	Policy 56 Waste management	Yes	Part A of this policy states that: <i>"All proposals will be required to make on-site provision for the reduction of general waste..."</i> . Whilst the intention that general waste should be reduced is strongly supported, officers are unclear how this policy will manifest itself in practice. To avoid instances where less physical space would be provided for general waste it is suggested that "the reduction of" be deleted from this policy.	To avoid instances where less physical space would be provided for general waste it is suggested that "the reduction of" be deleted from this policy.	Yes	None Given	None Suggested	Agreed – amend by removing the words 'the reduction of' to avoid the stated problem.
17	118	Greater London Authority	Policy 56 Waste management	Yes	With respect to Part B of this policy, it is recommended that site waste management plans require proposals to achieve outcomes set out in London Plan policies 5.16B a-f and 5.18C.	It is recommended that site waste management plans require proposals to achieve outcomes set out in London Plan policies 5.16B a-f and 5.18C.	Yes	None Given	None Suggested	The London Plan policy is a strategic one, and this policy will contribute to achieving it's aims. This will be added to the text at 9.29 for clarity, stating 'this policy seeks to achieve the outcomes set out in London Plan policies 5.16B and 5.18C.

**Respondent 18: CGMS on behalf of the Metropolitan Police**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
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ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
18	119	CGMS on behalf of the Metropolitan Police	Policy 2	Yes	MOPAC/MPS support this policy, particularly supporting paragraph 2.30 which states that in order to achieve lifetime neighbourhoods, the design and layout of development should be informed by Secured by Design principles. This is consistent with Policy 7.3 of the London Plan and should therefore be retained.	None	Not Specified	None Given	None Suggested	Support Noted
18	120	CGMS on behalf of the Metropolitan Police	Policy 40	Yes	The MOPAC/MPS support part G and H of Policy 40 which allow essential community infrastructure such as police patrol bases and custody centres to be provided on sites that are surplus to requirements and support proposals that meet the infrastructure needs of emergency services where there is a proven need for that facility. This is consistent with the prevailing planning policy framework, in particular Policy 2.17 of the London Plan. This should therefore be retained.	None	Not Specified	None Given	None Suggested	Support Noted
18	121	CGMS on behalf of the Metropolitan Police	Policy 49	Yes	The MOPAC/MPS support the inclusion of community uses as acceptable uses within non-designated town centres and neighbourhood parades. This will ensure the future delivery of police facilities that enable better public access and it is recommended that this policy be retained.	None	Not Specified	None Given		Support Noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
18	122	CGMS on behalf of the Metropolitan Police	Policy 53	Yes	The MOPAC/MPS support part A.a. of Policy 53 which requires vehicle parking provision to have regard to the maximum standards set out in the London Plan.	None	Not Specified	None Given	None Suggested	Support Noted
18	123	CGMS on behalf of the Metropolitan Police	Policy 58	Yes	Policy 58 seeks to protect existing community uses unless there is no longer a need for that facility, there are similar facilities near by or the redevelopment of the site would secure an over-riding public benefit. The MOPAC/MPS support this policy.	None	Not Specified	None Given	None Suggested	Support Noted
18	124	CGMS on behalf of the Metropolitan Police	Glossary		As set out in our previous representations, it is necessary to ensure the emerging Development Management Policies DPD is consistent with national, strategic and local planning policies with regard to the definition of community facilities. It is therefore recommended that the glossary definition of community facilities is amended to reflect the definition provided within paragraph 10.3 of Policy 57 of the draft Development Management DPD. The definition should be revised as follows (additional wording underlined):  <b><i>Community Facilities: Community facilities include educational facilities, youth centres, advice centres, and community halls places of worship, church halls, public halls, day nurseries, consulting rooms, educational establishments, museums, indoor sport facilities and emergency services.</i></b>	Revise definition as follows:  <b><i>Community Facilities: Community facilities include educational facilities, youth centres, advice centres, and community halls places of worship, church halls, public halls, day nurseries, consulting rooms, educational establishments, museums, indoor</i></b>	Not Specified	None Given	None Suggested	Amend glossary to be consistent with the definition used in the Core Strategy

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						<u>sport facilities and emergency services</u>				

**Respondent 19: NLP on behalf of Capital Shopping Centres**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
19	125	NLP on behalf of Capital Shopping Centres	Policy 46 Section C	No	<p>CSC considers that section C of Policy 46 is inconsistent with the NPPF and is therefore unsound and should be deleted. Section C states that "retail, leisure and cultural development including extensions of 400 sqm or less will be assessed without the need for a sequential assessment". From the supporting text (paragraph 8.10) it is understood that this exception has been included to facilitate the provision of local shops and facilities to meet the needs of future residents and employees associated with large scale residential / economic development.</p> <p>In its current form, policy 46 could give rise to significant out of centre retail development, which would be detrimental to the overall aims of the DPD which is to</p>	<p>To ensure that the policy is consistent with national policy CSC considers that section C of policy 46 should be deleted:</p> <p>"Retail, leisure and cultural development including extensions of 400 sqm or less will be assessed without the need for a sequential assessment."</p> <p>This will not preclude appropriate</p>	Not Specified	None Given	None Suggested	<p>The NPPF does not preclude Council's from setting a figure where sequential assessments will be needed. This figure will allow for small scale extensions to existing retail premises, without the need for a sequential assessment which would be unduly burdensome for this scale of development.</p> <p>However the policy will be amended to state 'within town centre boundaries or designated neighborhood parades'</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>enhance the vitality and viability of defined centres.</p> <p>Paragraph 24 of the NPPF requires that the sequential test is applied to planning applications for main town centre uses that are not in an existing centre. Whilst paragraph 26 of the NPPF states that local authorities may wish to set a local threshold where impact assessments will not be required, with the exception of small scale rural development (paragraph 25), the NPPF does not permit similar thresholds where the sequential test will not be required.</p> <p>Policy 46 is therefore inconsistent with national policy and is therefore unsound.</p>	<p>retail facilities coming forward as part of large scale redevelopment schemes as long as the applicant demonstrates that the need would not be met on any other sequentially preferable site. Accordingly, we consider that the following text at paragraph 8.10 should be deleted:</p> <p>“for these reasons retail, leisure and cultural development or extensions of up to 400 sqm will not be required to comply with the sequential approach set out in this policy.”</p>				<p>and the threshold reduced to 100sqm to allay concerns about the impacts .</p> <p>Consequential change to text at 8.10 to change 400sqm to 100sqm.</p>
19	125	NLP on behalf of Capital Shopping Centres	8.11	No	In relation to impact assessments, CSC consider the nationally set impact assessment threshold contained within paragraph 8.11 is not justified as it is not the most appropriate strategy for the borough when considered against reasonable	In order to safeguard investment in designated centres we believe a locally set threshold for impact assessments	Not Specified	None Given	None Suggested	No local evidence to justify this and none submitted to justify a reduction No change

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>alternatives (a locally set threshold).</p> <p>The Council should use the Development Management Policies DPD as an opportunity to set an appropriate locally set threshold for impact assessments rather than relying upon the default national threshold which we do not consider to be appropriate to adequately protect designated centres within and adjacent to the Borough. CSC considers, given the planned investment within the designated centres both within the Borough and nearby, that out of centre proposals below the 2,500sqm threshold could still significantly harm the vitality and viability of designated centres by delaying or jeopardizing investment</p>	in the Borough should be 1,000sqm gross.				

#### Respondent 20: English Heritage

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
20	126	English heritage	Policy 1		In the context of managing tall buildings it is noted that the policy wording has not been amended to incorporate important elements of the evaluation criteria of the EH/CABE Guidance on Tall Buildings (2007). As		Not Specified	None Given	None Suggested	The Area Action Plan identifies suitable locations for tall buildings in the Intensification Area consistent with policy 7.7 of the London Plan. The question of tall buildings

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>previously advised the policy should be expanded to make explicit reference to the following additional points for consideration. In terms of the design and layout consideration matters such as the effect on historic context (including the significance of heritage assets), natural topographical features, open spaces, important views, and skyline, should be included. Inserting these elements would help ensure the policy reflects both the NPPF (for example paragraphs 54, 58,126 &amp;128) and the EH/CABE Guidance.</p> <p>In terms of the supporting text to Policy 1, we note that paragraph 2.17 seeks to provide clarity on where tall buildings will be encouraged. For example it is accepted that tall buildings may be appropriate in the Harrow and Wealdstone AAP, subject to meeting the relevant design and heritage policies. However, beyond the AAP, the details fall short in clarifying whether tall buildings will be appropriate or not. The London Plan (2011) policy 7.7 part F states that Borough's should consider areas which are appropriate, sensitive or inappropriate for tall and large buildings and identify them, in the LDF. This approach mirrors paragraphs 154 and 157 of the NPPF. At present the text is</p>					<p>throughout the rest of the Borough was addressed through the examination of Harrow's Core Strategy where it was found that a blanket approach to tall building proposals would not be justified by the available local evidence. London Plan 7.7 provides robust criteria for the consideration of windfall proposals for tall buildings and this is signposted in para 2.7, otherwise policy 1 of the DPD sets out general criteria for the consideration of proposals in the Borough, including general building height. It is not considered necessary to restate criteria set out in London Plan or the EH/CABE guidance. No change.</p>



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					not in compliance with the wider policy context.					
20	127	English heritage	Para 3.42		We note that the text was intended to be amended in order to provide further clarity on the management of change within the setting of conservation areas. However from the text provided, it is not clear whether the need to consider the contribution the setting of the conservation area provides to the significance of its designation, and its need to be conserved, is made clear. In our emailed comments we suggested that developments which sit outside of conservation areas but within their settings can have significant impacts on their character and appearance. For example if the developments are inappropriate they can compromise historic compositions or detracting from elements of historic significance such as consistency of building heights or proportions. Therefore it would be useful for a stronger steer to be provided on this important issue, to ensure that impacts on surrounding conservation areas are fully considered when proposals are put forward for developments in their settings.		Not Specified	None Given	None Suggested	Criteria B of the policy is clear that the criteria for preserving conservation areas apply to their setting as well as sites within conservation areas. For the avoidance of doubt this point is reaffirmed in the last sentence of paragraph 3.43 of the reasoned justification which is considered that this part of the DPD provides a robust basis for managing impacts on the setting of conservation areas. No change.

**Respondent 21: Sandra Lee Palmer**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
21	128	Sandra Lee Palmer	General		<p>In my opinion it is absolutely vital that <u>ALL</u> existing open spaces, parks, playing fields, sports grounds and the like are fully protected from any development. Since the 1980s we have seen far too many green open spaces lost to medium and high density development projects to the detriment of the local residents, old and new. With an ever-increasing population and fewer properties with a reasonably sized garden, we are in desperate need of open spaces where residents of all ages can go to benefit from individual and team sports and recreational activities. Open spaces are places where residents can go, indeed should go, to bond with their neighbours. Youngsters should be encouraged to be active and providing sports grounds in a clean and safe environment is key to achieving this.</p> <p>The primary concern of Harrow Council must be the residents who live and will live in the immediate vicinity, not the developers or religious groups from outside the area that wish to build on green open space rather than the many unused brownfield sites in the borough, both small and large. In such cases the sole beneficiaries are the applicants, because they always place their needs and profit targets before any possible advantage to the community.</p>	None specified	Not Specified	None Given	None Suggested	The aim of the policy is to protect open spaces, and the policy gives effect to the Core Strategy's presumption against any loss.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
21	129	Sandra Lee Palmer	General		<p>Two controversial decisions to build on playing fields in Harrow are the Krishna-Avanti Primary School on the William Ellis Playing Field and 27 houses and flats on St George's Playing Field. Residents fought very hard against developments on these green open spaces with full justification, but lost to the incorrect findings of the Planning Inspector. I hope that this consultation process is genuine and the Council will adopt a policy that fundamentally protects all open space in the borough, which is national and local planning policy.</p> <p>It is essential that the policy should not depend on how or when publicly or privately owned open spaces are used, or if they have been used at all in the past few years, as it is well known that owners often deliberately prevent the use of open spaces in order to justify the sale of the land. The important factor to remember is that ALL open spaces are vital to the enlarged and diverse communities and hence they have an inherent value to the neighbourhood that cannot be underestimated or even ignored.</p>		Not Specified	None Given	None Suggested	<p>Harrow's Core Strategy, adopted February 2012, provides a clear policy basis for the protection of open space and for directing new development to brownfield land. However the decisions referred to, including that of the subject site, pre-date the Core Strategy but were made in the context of the Harrow Unitary Development Plan (2004), the remaining saved provisions of which will be superseded upon the adoption of the Development Management Policies DPD (and the AAP in respect of the Intensification Area). In the case of Kodak the open space is to be re-provided (and increased) as well as finding of improvements that will increase the carrying capacity of existing sports facilities.</p> <p>The allocation contained in the Site Allocations DPD reflects the planning</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										history for this site, made under previous development plan policies, but following which there is nonetheless an approved scheme for residential development to enable the remainder of the field to be restored as open space that is accessible to the community. <b>No change.</b>
21	130	Sandra Lee Palmer	General		<p>There is a notice outside St George's Playing Field regarding the designation of the open space as part residential and part public open space. I believe that there is a genuine deficiency of open space, sport and recreation grounds in the area when the existing and future population is considered. The enclosed open land is suitable for both children and adult team activities. Hence the entire area of St George's Playing Field should be designated public or private open space for sports or recreational activities only. Similarly, the Old Lyonians Sports ground, also in Pinner View, but a larger field, is ideal for children and team sports. Both grounds have been used for decades for this purpose and the numerous new flats in the area clearly demonstrate the continued need.</p> <p>Public parks such as Harrow Recreation Ground and Headstone Manor Recreation Ground serve the residents of Harrow, not only the local residents. The Kodak Development with almost 1,000 homes, potentially some 4,000 new residents of different ages and different needs, will certainly put enormous pressure on existing public open spaces. I am bitterly opposed to any development on the greenfield site at Kodak. Why build on green open space and then expect people, especially young people, to use Headstone Manor that is oversubscribed after 4pm and at the weekends or to travel to the Roger Bannister sports ground that is some distance away? This is complete folly.</p>	None specified	Not Specified	None Given	None Suggested	See above

Respondent 22: Dr Diana Dolman

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
22	131	Dr Dolman	Policy 25		This policy states that land identified as open space on the Harrow Policies Map will not be released for development. This is essential in a borough with an increasing population and thus an increasing need for open space. However, it is necessary to emphasise the 'and' in each of A, B, C and D. Land WILL NOT be released for development (A); reconfiguration ONLY if there would be no net loss of space (B,b); C refers only to ancillary, not housing or other development.	None specified	Not Specified	None Given	None Suggested	For clarity, text will be added in the reasoned justification to state that criteria B a-d are not mutually exclusive.
22	132	Dr Dolman	Policy 25		But what hope have we that these policies will actually be adhered to when we have seen what happened to my local open space, St George's Playing Field? The whole of this is designated open space (see Fig 1.2 in Area Action Plan DPD) but planning permission was granted to build houses, leaving only a small portion open and green (thus a net loss of open space, against stated policies). Even though its previous access and use by the community has now been prevented by the church (but could and should be allowed again), as section 5.2 states, even open space without community access is still of value. How can we be sure that even if the Council adheres to its own policies, a Planning Inspector who has misunderstood the local situation will not come and trample on local decisions and policies? The reasons why St George's Playing Field should not be developed are clearly set out in 5.32. Housing in the borough must be on previously developed land—development on open space must be resisted. There are other examples in the Borough, but this is the one with which I am most familiar.	None specified	Not Specified	None Given	None Suggested	This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation The Core Strategy and this DPD address this issue and will be applicable to any future applications of this nature.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
22	133	Dr Dolman	Policy 25		In section 5.33 it is stated that the borough has a deficiency of open space. All our open space must be protected from development, as Harrow's increasing population will need it more than ever in the future, and lost open space cannot be replaced, especially in a borough with a deficiency of open space.	None specified	Not Specified	None Given	None Suggested	The aim of the policy is to protect open spaces, and the policy gives effect to the Core Strategy's presumption against any loss.

#### Respondent 23: Three Rivers Council

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
23	134	Three Rivers Council	Whole DPD	Yes	No comment	None	Yes		None	The Council notes that the Borough Council had no comments to make in relation to the proposed policies of the Development Management Policies DPD.

**Schedule of Representations to the Pre-Submission Consultation on the Development Management Policies DPD by Document Order**

**Whole document**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
1	001	Hertsmer e Borough Council	Whole DPD	Yes		None	Yes		None	The Council notes that the Borough Council had no comments to make in relation to the proposed policies of the Development Management Policies DPD.
17	114	Greater London Authority	General comments	Yes	Officers note that the DPD does not appear to include a specific policy with respect to safeguarding land for transport. Whilst officers would not necessarily expect this DPD to be used to safeguard land, TfL would welcome a reference that the Council would refuse proposals where they would conflict with London Plan policies on safeguarding land for transport.	TfL would welcome a reference that the Council would refuse proposals where they would conflict with London Plan policies on safeguarding land for transport.	Yes	None Given	None Suggested	This is an omission and text will be added to the justification in paragraph 2.26 stating that proposals that would prejudice land used for transport will be refused.
17	115	Greater London Authority	General comments	Yes	No mention of walking and cycling appears to be made by the transport section of this DPD. Whilst it is acknowledged that Policy 2 provides references to creating and strengthening walking and cycling routes, TfL recommends that this is reinforced in relation to transport, with specific mention of measures such as the Strategic Walking Network and Legible London, and the cycle standards and facilities promoted by London Plan Policy 6.9.	Whilst it is acknowledged that Policy 2 provides references to creating and strengthening walking and cycling routes, TfL recommends	Yes	None Given	None Suggested	A reference will be inserted in Policy 54 to state (see policy 2C) as this is where the creation of lifetime neighborhoods, including walking and cycling are dealt with for clarity.  Reference to Legible



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						that this is reinforced in relation to transport, with specific mention of measures such as the Strategic Walking Network and Legible London, and the cycle standards and facilities promoted by London Plan Policy 6.9.				London and strategic walking network will be added to the reasoned justification at 2.30
17	116	Greater London Authority	General comments	Yes	The DPD appears to make only limited reference to promoting the bus network. TfL would welcome the inclusion of additional detail such as the need to: allocate road space; ensure good access to bus stops; and, implement TfL's Accessible Bus Stop Design Guidance.	TfL would welcome the inclusion of additional detail such as the need to: allocate road space; ensure good access to bus stops; and, implement TfL's Accessible Bus Stop Design	Yes	None Given	None Suggested	Accessible bus stops are dealt with in Policy 2D. General access improvements are also covered in this policy.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						Guidance.				

### Chapter 1: Introduction and Planning Policy Context

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	15	Hatch End Association	1.13		Most, if not all, the comments below suggest points where the DPD may be unsound because of errors of internal consistency, lack of clarity, errors in terms used, printing errors (e.g., in line 2 of this paragraph Appendix G should be C), or the like. In addition, on a number of occasions (some are spelled out below), it is suggested that the Council will "support" developments; this is not normally a Council response to applications, rather it would be more appropriate to say "approved". Similarly, in the contrary situation, there are some inconsistencies where proposals may be either "resisted" or "refused".	Replace support with approve, and resist with refuse throughout	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.
10	71	Preston Bennett	Introduction		It is noted at the outset that it is highlighted at various junctures of the DPD that residential garden land is no longer classified as 'previously developed land'. Whilst it is accepted that this is the case, it is reiterated that the Council's stance, as endorsed by Core Strategy Policy CS1, is wrong in proposing a	There should remain a site-by-site analysis of other planning issues and the surrounding	Not Specified	None Given	None Suggested	This issue has been dealt with through the Core Strategy including at the Examination. To change the presumption would

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Borough-wide restriction on any garden land, and is not in the spirit of this change of land classification within national policy. As per neighbouring Boroughs (i.e. Barnet and Hertsmere) and in line with various Appeal Inspector decisions, there should remain a site-by-site analysis of other planning issues and the surrounding character of the area to establish whether a development is appropriate, rather than an outright prohibition on development as it is on garden land. It was hoped, and is suggested, that the Development Management Policies would include such a position, to allow any development to be assessed on its wider merits and a distinction between residential garden land and other garden land, e.g. institutional uses.	character of the area to establish whether a development is appropriate, rather than an outright prohibition on development as it is on garden land.				be counter to the Core Strategy and unsound.  An SPD is to be produced to clarify what is and is not garden land development.

## Chapter 2: Character and Amenity

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	95	Greater London Authority	Paragraph 2.5	Yes	In addition to 'Secure by Design', the Council may also wish to reference the 'Safer Places' principles. These seek an integrated approach to crime prevention through passive design approaches which still promotes public permeability and legibility, which are essential for ensuring that new development appropriately connects to its surroundings, and	Include references to Safer places	Yes	None Given	None Suggested	This is covered in the R.J at 2.30, however an additional reference will be made to Safer Places for clarity See proposed

ID	Re p No .	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
					respects local character and context.					modification DM4

### Policy 1: Achieving a High Standard of Development

ID	Re p No .	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
3	16	Hatch End Associati on	Policy 1 para 2.7		Policy 1 says that proposals not achieving high standards of design, privacy, etc "will be resisted". Para 2.7 says they "will be refused". This is one example where terminology is unsound through internal inconsistency. Moreover, the last two sentences of 2.7 are repetitions of the policy rather than justifications.	Terminology inconsistent and repetition to be amended	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.
3	17	Hatch End Associati on	Para 2.12		The spelling error in last line makes the intention unsound. Surely it is intended that external equipment should be DISCREETLY accommodated, i.e. unobtrusive, and not DISCRETELY accommodated, i.e separated?	Spelling error	Not Specified	None Given	None Suggested	Typographical error – change See proposed modification DM1
17	96	Greater London Authority	Policy 1 Achie	Yes	The Council is invited to replace “high standard of privacy” with “appropriate level of privacy” to promote the balance of private, semi-private, and public space	replace “high standard of privacy” with	Yes	None Given	None Sugg	Not agreed – the Council seeks a high standard of

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
			ving a High Standard of Development, part C		in line with the principles of London Plan policies 7.3 and 7.6, and to recognise the fact that not all new development and changes of use would be required to be very private.	"appropriate level of privacy"			este d	privacy with regards to context. Therefore it is not inconsistent with the London Plan, as the London Plan policies deal with other aspects such as de-markation and design.
20	126	English heritage	Policy 1		<p>In the context of managing tall buildings it is noted that the policy wording has not been amended to incorporate important elements of the evaluation criteria of the EH/CABE Guidance on Tall Buildings (2007). As previously advised the policy should be expanded to make explicit reference to the following additional points for consideration. In terms of the design and layout consideration matters such as the effect on historic context (including the significance of heritage assets), natural topographical features, open spaces, important views, and skyline, should be included. Inserting these elements would help ensure the policy reflects both the NPPF (for example paragraphs 54, 58, 126 &amp; 128) and the EH/CABE Guidance.</p> <p>In terms of the supporting text to Policy 1, we note that paragraph 2.17 seeks to provide clarity on where tall buildings will be encouraged. For example it is accepted that tall buildings may be appropriate in the Harrow and Wealdstone AAP, subject to meeting the relevant design and heritage policies. However, beyond the AAP, the details fall short in clarifying whether tall buildings will be appropriate or not. The London Plan (2011) policy 7.7 part F states that</p>		Not Specified	None Given	None Suggested	The Area Action Plan identifies suitable locations for tall buildings in the Intensification Area consistent with policy 7.7 of the London Plan. The question of tall buildings throughout the rest of the Borough was addressed through the examination of Harrow's Core Strategy where it was found that a blanket approach to tall building proposals would not be justified by the available local evidence. London Plan 7.7 provides robust criteria for

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Borough's should consider areas which are appropriate, sensitive or inappropriate for tall and large buildings and identify them, in the LDF. This approach mirrors paragraphs 154 and 157 of the NPPF. At present the text is not in compliance with the wider policy context.					the consideration of windfall proposals for tall buildings and this is signposted in para 2.7, otherwise policy 1 of the DPD sets out general criteria for the consideration of proposals in the Borough, including general building height. It is not considered necessary to restate criteria set out in London Plan or the EH/CABE guidance. No change.

### Policy 2: Achieving Lifetime Neighbourhoods

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	18	Hatch End Association	Policy 2c		In its everyday meaning "legible" is an awkward adjective to describe the pedestrian/cycling environment; "intelligible" would be clearer. In the final sentence, "(pedestrian and cyclist) permeability" is awkward; "flows" would be better, or possibly "...impede permeability by pedestrians and cyclists	Suggested grammatical changes	Not Specified	None Given	None Suggested	This terminology is used in the London Plan and is widely recognized. No change.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
10	72	Preston Bennett	Policy 2		The overall objectives of this policy are supported. However, it is suggested that it is made clear that in some circumstances when converting buildings to residential it may not be possible to meet all Lifetime Homes considerations. As has been accepted when appropriate previously in Harrow, the policy should make clear that conversion schemes should strive to meet as many Lifetime criteria as possible, but with the understanding that there must be a degree of flexibility where it can be demonstrated that not all can be met (for identified and justified reasons).	However, it is suggested that it is made clear that in some circumstances when converting buildings to residential it may not be possible to meet all Lifetime Homes considerations.	Not Specified	None Given	None Suggested	The requirement comes from the London Plan. Harrow's Residential Design Guide contains guidance that acknowledges flexibility may be required on certain schemes.  Paragraph 2.29 will be expanded to highlight this. See proposed modification DM2
12	80	RPS on behalf of Pearson Pension Property Fund	Policy 2	No	The policy states that the location, design and layout of development contribute towards the creation of lifetime neighbourhoods, which is considered acceptable by RPS. It is also accepted that non-residential development is to be appropriately located so as to sustain Town Centres, neighbourhood parades and local employment. RPS, however, considers that development and change of use proposals, in particular for retail uses, in sustainable locations outside of town and local centres, should be supported by the Council, where they would enhance retail choices and employment opportunities in these areas without causing a detrimental impact to the retail uses within the centres. This in particular is important for the DMP	The Core Strategy should include reference that development and change of use proposals, in particular for retail uses, in sustainable locations outside of town and local centres would be	Not Specified	None Given	None Suggested	Harrow's Core Strategy directs retail and services to town centres in accordance with the National planning Policy Framework

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					document to comply with the guidance within the NPPF and presumption in favour of sustainable development. The inclusion in the policy that non-residential uses are to be accessible to all is supported.	supported by the Council, where they would enhance retail choices and employment opportunities in these areas without causing a detrimental impact to the retail uses within the centres.				
17	96	Greater London Authority	Policy 2 Achieving a High Standard of Development,		The proposed Lifetime Neighbourhoods policy is supported. However, it would be useful to include a reference to the need for good access to services and facilities, as well as ensuring development promotes a healthy lifestyle, as these are also essential ingredients for the delivery of Lifetime Neighbourhoods.	include a reference to the need for good access to services and facilities, as well as ensuring development promotes a healthy lifestyle	Yes	None Given	None Suggested	Agreed- reference will be added into the policy. See proposed minor modification DM6
17	98	Greater London Authority	Paragraph 2.30	Yes	In line with comments made in representation 1 above, officers would welcome a reference to 'Safer Places' as well as 'Secure by Design' to ensure that there is a balance between security and safety, and	Include references to Safer places	Yes	None Given	None Suggested	This is mostly covered in the R.J at 2.31, however an additional reference will be made



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					permeability and connectivity, within neighbourhoods.				d	See proposed minor modification DM4
18	119	CGMS on behalf of the Metropolitan Police	Policy 2	Yes	MOPAC/MPS support this policy, particularly supporting paragraph 2.30 which states that in order to achieve lifetime neighbourhoods, the design and layout of development should be informed by Secured by Design principles. This is consistent with Policy 7.3 of the London Plan and should therefore be retained.	None	Not Specified	None Given	None Suggested	Support Noted

### Policy 3: Protected Views and Vistas

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
2	007	Harrow Agenda 21	Policy 3	Yes	We support this; many of us have seen views of the Hill lost in our lifetime. The St, George's centre at the top of Headstone Road and the building at Neptune's point and we dread what will happen on the site of Harrow's old post office. Despite the community's opposition the Inspectorate allowed Neptune Point.			None given	None Suggested	Noted
5	39	CBRE Dandara	Policy 3	No	Proposed policy 3 of the above pre-submission DPD considers the protection of views and vistas within the Borough of Harrow, making specific reference to the Views Assessment document published in July 2012 as part of the evidence base for the Local	None	Not Specified	None Given	None Suggested	The views assessment was published and made available on the Council's

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Development Framework. The Views Assessment has not been subject to any consultation or independent testing.				d	website, as is every other evidence base document. It was also consulted on in January 2012, and it is noted that CBRE responded to this consultation, as you reference in your subsequent representation.
5	40	CBRE Dandara	Policy 3	No	Policy 3 goes on to establish seven controls where a protected view exists. Controls a. and b. consider the way in which new development should respond to the red and yellow lines communicated within the eleven protected views, as detailed within the Views Assessment document and appended within Schedule 4 to the DM DPD. Control a. states that development should be refused if it exceeds the threshold height of the red line within the landmark viewing corridor. Control b. states that development in the wider setting consultation area (shown in yellow) should form an attractive element in its own right and preserve or enhance the viewers ability to recognise and appreciate the landmark.	None	Not Specified	None Given	None Suggested	Noted
5	41	CBRE Dandara	Policy 3	No	Policy 3 provides five further controls (C. to G.) which state in outline: <input type="checkbox"/> Development should not harm the character and composition of the protected views, and preserve and enhance viewers ability to recognise and appreciate important landmarks; <input type="checkbox"/> Development should not be overly intrusive or	methodology applied to identify the red and yellow line positions would have considered the outcome of	Not Specified	None Given	None Suggested	The Views Assessment was carried out by an appropriately qualified professional consultant, and

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
					<p>unsightly to the detriment of the view, or detract from the prominence of the landmark within the foreground and middle ground;</p> <p>□ Development should give context to and not harm the composition of the view when in the background; Viewing places should be accessible and managed to enhance experience of the view, and;</p> <p>□ Opportunities for new views should be exploited through the design of new development.</p> <p>2. Policy Testing</p> <p>2.1. The above policy significantly relies on the interpretation of the Views Assessment document in respect of the exact alignment of the red and yellow lines. The methodology contained within the Views Assessment document outlines how each of the existing protected views are assessed to confirm whether their protected status should remain. However, no methodology is provided which explains how the red and yellow lines that feature so prominently within the draft policy 3 have been prepared and tested. This appears to be a major omission, as the exact drawing of the lines carry the weight of the policy.</p> <p>2.2. Moreover, representations were made in February 2012 in respect of a draft of the Views Assessment Document (in relation to the Harrow and Wealdstone Intensification Area AAP), that pointed out how the definition of the development height restrictions contradicted the conclusions of the Secretary of State in an appeal at 51 College Road, Harrow in March 2010. It is recognised that the final Views Assessment document has been refined from this initial draft, however the methodology and degree of rigour in testing the definition of the red and yellow lines remains a concern, particularly when some aspects of the</p>	the 51 College Rd appeal				was subject to public consultation and revised accordingly. The Council is satisfied that its methodology and conclusions are robust.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Views Assessment Document remain in conflict with the Secretary of State's decision of the appeal mentioned above. The attached Figures 1 to 4 highlight this position. We would expect that the methodology applied to identify the red and yellow line positions would have considered the outcome of such a significant planning appeal, in which verified montages were prepared, presented and cross examined in front of an experienced Inspector. This level of rigour is not common, and would prove invaluable in what is often a difficult judgement as to where such a development height restriction should be located. That makes the lack of reference to the Secretary of State's decision strange, particularly as the author gave evidence at that public inquiry. Furthermore, the result of the Secretary of State's decision was discussed at the Core Strategy's EiP where the Inspector advised that reference to the acceptability of a tall building at 51 College Road by virtue of this decision should explicitly be included within the Core Strategy. The Core Strategy was subsequently revised and adopted accordingly.					
5	42	CBRE Dandara	Policy 3	No	As stated above, it is explicitly stated within the Core Strategy that 51 College Road, is an appropriate location for a tall building. Representations have been submitted in respect of the Harrow and Wealdstone Intensification Area AAP requesting that, to be consistent with the Core Strategy, the policy framework within the AAP should also make explicit reference to a tall building being acceptable in principle at 51 College Road. The APP does state within the Site	Policy 3 of the DM DPD is clearly at odds with this and inconsistent with the Core Strategy by stating that development should not	Not Specified	None Given	None Suggested	The Views Assessment was carried out by an appropriately qualified professional consultant, and was subject to public consultation and revised

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Specific Guidance for Site 18 that up to 19 storeys on the site is acceptable. Policy 3 of the DM DPD is clearly at odds with this and inconsistent with the Core Strategy by stating that development should not exceed the red line as it has clearly been accepted within the adopted CS that at 51 College Road it is acceptable to do so.	exceed the red line as it has clearly been accepted within the adopted CS that at 51 College Road it is acceptable to do so.				accordingly. The Council is satisfied that its methodology and conclusions are robust.
5	43	CBRE Dandara	Policy 3	No	<p>Draft Policy 3 of the Development Management DPD is not considered to be justified, and therefore sound, due to:</p> <p>i. The lack of rigor in the methodology leading to the identification of the red and yellow lines within the Views Assessment Document;</p> <p>ii. The lack of reference to the appeal decision for 51 College Road, in which aspects of the Views Assessment document directly contradicts, and;</p> <p>iii. The lack of co-ordination with other DPD documents, such as the adopted Core Strategy.</p> <p>iv. The restrictions imposed by Policy 3, specifically the red and yellow lines, raise significant questions as to the ability to deliver the AAP objectives and target outputs due to the limitations on the scale of buildings it imposes..</p> <p>4.2. The Views Assessment document should in our opinion be reviewed separately to consider the above, and be revised as necessary. At the very least, Policy 3 should be consistent with the adopted Core Strategy, and therefore to be sound, Policy 3 should explicitly state that the principle of a tall building (thus breaking the threshold height lines) has been accepted at 51 College Road.</p>	Policy 3 should explicitly state that the principle of a tall building (thus breaking the threshold height lines) has been accepted at 51 College Road.	Not Specified	None Given	None Suggested	<p>The Views Assessment was carried out by an appropriately qualified professional consultant, and was subject to public consultation and revised accordingly. The Council is satisfied that its methodology and conclusions are robust.</p> <p>With regards to point 2, this is contained in the Core Strategy and Area Action Plan, and is not needed here.</p> <p>Regarding point 3,</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										<p>this DPD contains general policy for the whole Borough, and has been developed to be in conformity with the Core Strategy.</p> <p>Site specifics are dealt with in the Area Action Plan, including indicative heights etc.</p> <p>The policy reflects the evidence base, and the subject site is dealt with in the Area Action Plan.</p>
17	99	Greater London Authority	Policy 3 Protected Views and Vistas	Yes	<p>The principle of using London View Management Framework guidance and methodology for local views management and assessment is strongly supported. However, in order to implement the proposed height restrictions on development in certain local views, and to enable like for like assessments of impact, the supporting detail in Schedule 4 must include specifics with respect to: the exact location of the assessment point; the height of the camera position; and, the precise direction the camera should be pointing towards. Having discussed this matter with the Council, GLA officers understand this detail resides within the supporting Harrow Views Assessment. The Council is advised to carry this information forward into Schedule 4 for ease of reference.</p>	<p>Schedule 4 must include specifics with respect to: the exact location of the assessment point; the height of the camera position; and, the precise direction the camera should be pointing towards.</p>	Yes	None Given	None Suggested	<p>Grid references will be added for accuracy. An indicative height for the camera position is shown on each view cone based on OS data. It is recognized that there is a small margin of inaccuracy associated with OS data which is why the heights are shown as indicative.</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										With regards to the precise direction of the lens, this is not definitive as the views are mainly multi-frame panoramas – it is considered that the photographs and viewcones are robust enough to enable detailed assessments as part of any planning application.

**Policy 4: Shopfronts and Signs**

No comments received

**Policy 5: Advertisements**

No Comments received

**Policy 6: Areas of Special Character**

No comments received

**Chapter 3: Conservation and Heritage**

No comments received

**Policy 7: Heritage Assets**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	19	Hatch End Association	Policy 7b/c		Shouldn't "its settings" be "their settings"?	Suggested grammatical changes	Not Specified	None Given	None Suggested	Agreed, typographical error – change See proposed minor modification DM7

### Policy 8: Enabling Development

No comments received

### Policy 9: Conservation Areas

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
20	127	English heritage	Para 3.42		We note that the text was intended to be amended in order to provide further clarity on the management of change within the setting of conservation areas. However from the text provided, it is not clear whether the need to consider the contribution the setting of the conservation area provides to the significance of its designation, and its need to be conserved, is made clear. In our emailed comments we suggested that developments which sit outside of conservation areas but within their settings can have significant impacts on their character and appearance. For example if the developments are inappropriate they can compromise historic compositions or detracting from elements of historic significance such as consistency of building heights or proportions. Therefore it would be useful for a stronger steer to be provided on this important issue,		Not Specified	None Given	None Suggested	Criteria B of the policy is clear that the criteria for preserving conservation areas apply to their setting as well as sites within conservation areas. For the avoidance of doubt this point is reaffirmed in the last sentence of paragraph 3.43 of the reasoned justification which is considered that this



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					to ensure that impacts on surrounding conservation areas are fully considered when proposals are put forward for developments in their settings.					part of the DPD provides a robust basis for managing impacts on the setting of conservation areas. No change.

### Policy 10: Listed Buildings

No comments received

### Policy 11: Locally Listed Buildings

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	20	Hatch End Association	Policy 11 and Para 3.68		Where a speculative demolition has been made and the local listing justifies it, "reconstruction" or "reinstatement" will be required. Some clarification or indication of exactly what will be required is necessary: a copy of the original, another building of the same type or size, of the same use, or what? The lack of definition is unsound and may cause legal argument.	Make the requirements clearer for reconstruction / reinstatement	Not Specified	None Given	None Suggested	This part of the policy will be removed, as it is not legal. See proposed minor modifications DM8 & DM9
13	85	Stewart Braddock – Croft Partnership	Policy 11	No	This policy is in conflict with statutory planning law and should be amended. It is wrong in law to apply the same protections afforded to statutory listed properties to those which are locally listed. Statutory listed buildings are objectively assessed by	Amended policy should read "When assessing proposals affecting locally listed buildings, including	No	This policy is in conflict with statutory planning law and should be amended. It is	"When assessing proposals	This part of the policy will be removed, as it is agreed that is not legal. Consequential

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>English Heritage as being of architectural or historic interest and which are then included by the Department of Culture Media and Sport (DCMS) on the statutory list under the Planning (Listed Buildings and Conservation Areas) Act 1990. Buildings which are not included in the statutory list are, by definition, not of listable quality and therefore are not afforded the same statutory protection. It is therefore wrong to apply a policy for reinstatement of a locally listed building after demolition as this would indicate that a locally listed building is subject to the same protections afforded to a statutory building which in law it does not.</p>	<p>those that would involve demolition or compromise a building's setting, particular consideration will be given to preserving or enhancing their local architectural or historic significance. "</p> <p>END</p>		<p>wrong in law to apply the same protections afforded to statutory listed properties to those which are locally listed. Statutory listed buildings are objectively assessed by English Heritage as being of architectural or historic interest and which are then included by the Department of Culture Media and Sport (DCMS) on the statutory list under the Planning (Listed Buildings and Conservation Areas) Act 1990.</p>	<p>affecting locally listed buildings, including those that would involve demolition or compromise a building's setting, particular consideration will be given to preserving or enhancing</p>	<p>amendments will be made to the text. See proposed minor modifications DM8 &amp; DM9</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
								Buildings which are not included in the statutory list are, by definition, not of listable quality and therefore are not afforded the same statutory protection. It is therefore wrong to apply a policy for reinstatement of a locally listed building after demolition as this would indicate that the building is subject to the same protections afforded to a statutory building which in law it does not.	their local architectural or historic significance." END	

**Policy 12: Scheduled Ancient Monuments**

No comments received

### Policy 13: Archaeology

No comments received

### Policy 14: Nationally Registered Historic Parks and Gardens

No comments received

### Policy 15: Locally Listed Parks and Gardens

No comments received

## Chapter 4: Environmental Sustainability

No comments received

### Policy 16: Managing Flood Risk

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
2	008	Harrow Agenda 21	Policy 16	Not Stated	Too many people are covering their front gardens completely. Harrow does not appear to summon those who concrete over it all. Especially crazy paving that is impermeable. We understood that a recent law forbade complete coverage. We therefore think that Harrow is not effective on this. Why are not people asked to uncover the correct percentage?			None given	None Suggested	Enforcement issue, outside the scope of this consultation.
4	29	Campaign for a	Policy 16		On Policy 16 (Managing Flood Risk), building on sites which are at substantial risk of flooding might be	The policy stated is	Not Spe	None	None	Policy is acceptable by the Environment

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Better Harrow Environment			acceptable if properly engineered. This could include using the ground level only for parking vehicles and raising habitable accommodation on piles. The policy stated is insufficiently robust. Giving dry means of escape and not allowing habitable basements in flood –prone areas is not good enough. When flooding occurs and flood water enters homes it is not quick or easy to dry out and clean up afterwards. Flooding is often accompanied by power cuts, epidemics, shortage of alternative accommodation etc. The only sensible way is <b>not to build homes which can be flooded</b> . Neither should developments be allowed which divert flood water to other areas where harm could be done. Paragraph D says that proposals which would involve the loss of undeveloped flood plain “will be resisted”. This should say “refused”.	insufficiently robust. Giving dry means of escape and not allowing habitable basements in flood –prone areas is not good enough. The only sensible way is <b>not to build homes which can be flooded</b> .  <b>Change resisted to refused.</b>	specified	Given	Suggested	Agency and conforms with the NPPF as it directs development away from areas of highest flood risk. In built up areas, re-development needs mean this principle cannot always be met. Therefore in these cases the Council will ensure that the new development is resilient and resistant to flood risk, and does not increase the risk of flooding elsewhere.
6	44	Environment Agency	Policy 16	Yes	We strongly support this policy as it addresses flood risk in line with the National Planning Policy Framework.	None	Not Specified	None Given	None Suggested	Support noted
14	87	Thames Water	Policy 16	No	Thames Water generally support the policy, but consider that it could be improved in relation to flooding from sewers as pluvial flooding is particularly significant in urban areas.  The technical Guidance to the National Planning Policy Framework which retains key elements of PPS25: Development and Flood Risk states that a	The policy should make specific reference to flooding from sewers and developers should be	Not Specified	None Given	None Suggested	This is dealt with in part A, where it references ‘all sources’.

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
					<p>sequential approach should be used by local planning authorities in areas to be at risk from forms of flooding other than from river and sea which includes "<i>Flooding from Sewers</i>".</p> <p>Policy 16 should therefore include reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development.</p> <p>It is vital that sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided. It is also important not to under estimate the time required to deliver necessary infrastructure, for example:</p> <ul style="list-style-type: none"> <li>- local network upgrades take around 18 months</li> <li>- sewage treatment works upgrades can take 3-5 years</li> </ul> <p><i>This therefore increases the importance for Thames Water's proposed changes to Policy 17 regarding sewerage/waste water infrastructure to be taken into account.</i></p>	<p>required to show that as a result of their development that Pluvial flooding will not occur either on or off site further down the catchment.</p>				

**Policy 17: On Site Water Management and Surface Water Attenuation**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
4	30	Campaign for a Better Harrow Environment	4.32		In Paragraph 4.32 (Ensure separation of surface and foul water systems), one would feel more comfortable if the "major developments involving modifications to or extension of the surface water and foul water networks to maintain separation of the two systems" could be guaranteed to take place.	None suggested	Not Specified	None Given	None Suggested	Policy seeks this but it cannot be guaranteed in the document. This is a matter for Thames Water and the Council's drainage department at the application and build stage of development, and would be subject to enforcement for compliance.
6	45	Environment Agency	Policy 17	Yes	We fully support this policy and the commitment to both limit mains water consumption to 105 litres per person per day and to achieve greenfield runoff rates.	None	Not Specified	None Given	None Suggested	Support noted
14	86	Thames Water	Policy 17	No	We do not object to the policy in principle, but consider that it does not adequately cover sewerage and water infrastructure provision, which is essential to all development, and focuses mainly on SuDS. We support the use of sustainable drainage systems in appropriate circumstances. However, they are only one factor which affects water quality. A key factor which affects water quality is waste water treatment as treated effluent is normally discharged into the nearby watercourse. Therefore, sufficient waste water treatment infrastructure is required to service development to protect water quality.  We support Part B (b) of the Policy which requires	It is therefore important that Policy 17 is amended to specifically refer to water and sewerage/waste water infrastructure or there should be a new Policy along the lines of:	Not Specified	None Given	None Suggested	The Core Strategy already includes Core Policy CS1 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. Core Policy CS1 Z covers all social

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>separation of surface and foul water systems.</p> <p>Regarding the remainder of the policy, a key sustainability objective for the preparation of the Local Development Framework/Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the new National Planning Policy Framework (NPPF), March 2012, states:</p> <p><b><i>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></b></p> <p>Paragraph 162 of the NPPF relates to infrastructure and states:</p> <p><b><i>“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</i></b></p> <p>Policy 5.14 of The London Plan, July 2011 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and states:</p> <p><b><i>“Strategic</i></b></p> <p><i>A - The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local authorities to:</i></p>	<p><b><u>Proposed Addition to Infrastructure Policy 17 or Text for new Water/Wastewater Infrastructure Policy</u></b></p> <p>Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:</p> <p>3. sufficient capacity already exists or</p> <p>4. extra capacity can be provided in time to serve</p>				<p>and physical infrastructure applicable to development including water supply and sewerage infrastructure. The Council does not consider it necessary to repeat the requirements of this Core Policy again in the Development Management DPD, especially where the effect would be to single out one type of infrastructure requirement, potentially giving it priority over all other infrastructure capacity considerations, such as transport, education, healthcare etc, which the Council considers should have equal weight.</p> <p>However, in light of the representations</p>



ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>a) ensure that London has adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth and climate change</p> <p>b) protect and improve water quality having regard to the Thames River Basin Management Plan</p> <p><b>Planning Decisions</b></p> <p>B - Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.</p> <p>C - Development proposals to upgrade London's sewage (including sludge) treatment capacity should be supported provided they utilize best available techniques and energy capture.</p> <p><b>LDF preparation</b></p> <p>E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel."</p> <p>Policy 5.15 of the London Plan relates to water use and supplies and states:</p> <p><b>"Strategic</b></p> <p>A The Mayor will work in partnership with appropriate agencies within London and</p>	<p>the development which will ensure that the environment and the amenities of local residents are not adversely affected.</p> <p>When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds</p>				<p>made by this respondent, it is proposed to modify the reasoned justification to Policy 17 to draw attention to the allocated development sites where Thames Water had raised concerns regarding waste water capacity and to highlight the need for the developer to prepare a drainage strategy in liaison with Thames Water, the purpose of which is to model the network capacity and ensure that, if mitigation is required, this is undertaken ahead of occupation of the development. The Council therefore considers that the combination of Core Policy CS1 Z and paragraph 4.20 of the Development Management</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p><i>adjoining regional and local planning authorities to protect and conserve water supplies and resources in order to secure London's needs in a sustainable manner by:</i></p> <p><i>a minimising use of mains water</i></p> <p><i>b reaching cost-effective minimum leakage levels</i></p> <p><i>c in conjunction with demand side measures, promoting the provision of additional sustainable water resources in a timely and efficient manner, reducing the water supply deficit and achieving security of supply in London</i></p> <p><i>d minimising the amount of energy consumed in water supply</i></p> <p><i>e promoting the use of rainwater harvesting and using dual potable and grey water recycling systems, where they are energy and cost-effective</i></p> <p><i>f maintaining and upgrading water supply infrastructure</i></p> <p><i>g ensuring the water supplied will not give rise to likely significant adverse effects to the environment, particularly designated sites of European importance for nature conservation.</i></p> <p><b>Planning decisions</b>  <i>B Development should minimise the use of mains water by:</i></p> <p><i>a incorporating water saving measures and equipment</i></p> <p><i>b designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day.</i></p>	<p><b>appropriate improvements which will be completed prior to occupation of the development.”.</b></p> <p>Text along the following lines should be added to the Core Strategy to support the above proposed Policy :</p> <p><b>“The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is</b></p>				<p>Policies DPD adequately addresses the respondent's concerns. See proposed minor modification DM12</p>

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
					<p><i>C New development for sustainable water supply infrastructure, which has been selected within water companies' Water Resource Management Plans, will be supported."</i></p> <p>We consider that the Development Management Document must specifically cover the key issue of the provision of water and sewerage infrastructure to service development in policy to accord with the London Plan. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of "soundness".</p> <p>Notwithstanding the preparation of a separate Infrastructure Delivery Plan, a separate policy on waste water and water supply infrastructure is necessary because it will not be possible to identify all of the water supply and wastewater/sewerage infrastructure required over the plan period due to the way we are regulated and plan in 5 year periods.</p> <p>The water companies' investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP5 period which runs from 1<sup>st</sup> April 2010 to 31<sup>st</sup> March 2015 and does not therefore cover the whole Local Plan period. AMP6 will cover the period from 1<sup>st</sup> April 2015 to 31<sup>st</sup> March 2020, but we have not yet submitted our business plan for this period.</p>	<p><b><i>adequate capacity both on and off the site to serve the 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. Where there is a capacity problem and no improvements are programmed by the water company, the Council will</i></b></p>				

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
					<p>Our draft Business Plan for AMP6 will be submitted to Ofwat in August 2013.</p> <p>Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements can not be required to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p> <p>It is important that developers demonstrate that adequate capacity exists both on and off the site to serve the 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 water &amp; sewerage infrastructure. Where there is a capacity problem 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</p>	<p><i>require the developer to fund appropriate improvements which must be completed prior to occupation of the development."</i></p> <p>Such a policy is important as sewerage and water undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through</p>				

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						phasing or the use of Grampian style conditions.				
7	50	Herts and Middlesex Wildlife Trust	Policy 16, 17 and 18	Yes	<p>Herts &amp; Middlesex Wildlife Trust welcomes the above Policies, which should help contribute to the achievement of more environmentally sound and sustainable development within Harrow.</p> <p>We welcome the attention that has been paid to developing policy sets targeting different aspects of environmental sustainability (Policies 16 to 22). In particular, the Policies 16, 17, and 18 relating to sustainable flood risk management and to rivers and water courses are welcome.</p> <p>Unsustainable levels of water abstraction and usage can have a severely detrimental impact on ecosystems, through removing water from the natural environment, altering river levels and flow rates, and changing the characteristics of associated habitats. Policies to reduce water consumption and also encourage natural drainage and groundwater recharge are strongly supported. The Council should expect all developments (including minor) to seek to include SUDS measures. We would add that the Council should encourage use of SUDS techniques which also help to achieve biodiversity goals. Building in the floodplain can dramatically alter the local hydrology, damage habitats and ecosystem function, and interrupt ecological networks. It is important that building in the floodplain is clearly opposed in local plans.</p>	The Council should expect all developments (including minor) to seek to include SUDS measures.	Not Specified	None Given	None Suggested	<p>Support noted.</p> <p>Agreed change – Text will be added to Policy 17, part C, to state 'proposals for minor, householder and conversions'.</p> <p>Wording change of where 'possible' to where 'feasible'</p> <p>See proposed minor modification DM11</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					HMWT are pleased to see Policy 18. Restoration of more natural river systems has the potential to substantially improve ecological connectivity, and enable wildlife to move through built up areas.					

**Policy 18: Protection and Enhancement of River Corridors and Watercourses**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
4	31	Campaign for a Better Harrow Environment	4.49		On Policy 16 (Rivers and Watercourses), para 4.49 is too weak. It says that proposals which adversely affect the condition or functioning of the river or watercourse within, adjacent to or downstream of the site, and proposals which fail to secure feasible enhancements or deculverting in accordance with this policy, will be resisted. We think that resisted should be replaced by <b>refused</b> .	Replace resisted with refused	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.
6	46	Environment Agency	Policy 18	Yes	We strongly support this policy on all points. This will help protect biodiversity and manage flood risk in line with the National Planning Policy Framework. It will also help to achieve the objectives of the Water	None	Not Specified	None Given	None Suggested	Support noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Framework Directive.				d	

### Policy 19: Sustainable Design and Layout

No comments received

### Policy 20: Decentralised Energy Systems

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	100	Greater London Authority	Policies 20 Decentralised Energy Systems, and 21 Renewable Energy Technology	Yes	<p>In line with representations made at the previous consultation stage, the GLA supports the inclusion of energy policies with respect to promoting decentralised energy systems and renewable energy technologies. These policies will work in conjunction with the overarching approach of the Harrow Core Strategy, and strategic policy within the London Plan.</p> <p>The Council's intention to ensure minor development also examines the feasibility for connection to decentralised energy networks, and use of renewable energy technologies, is supported in principle. However, to avoid any confusion by way of reverse inference, the Council is advised to simply state "Development proposals should..." rather than specifying a scale of development.</p>	However, to avoid any confusion by way of reverse inference, the Council is advised to simply state "Development proposals should..." rather than specifying a scale of development.	Yes	None Given	None Suggested	Agreed change. Re-word as stated for clarity. See proposed minor modification DM13

**Policy 21: Renewable Energy Technology**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	100	Greater London Authority	Policies 20 Decentralised Energy Systems, and 21 Renewable Energy Technology	Yes	<p>In line with representations made at the previous consultation stage, the GLA supports the inclusion of energy policies with respect to promoting decentralised energy systems and renewable energy technologies. These policies will work in conjunction with the overarching approach of the Harrow Core Strategy, and strategic policy within the London Plan.</p> <p>The Council's intention to ensure minor development also examines the feasibility for connection to decentralised energy networks, and use of renewable energy technologies, is supported in principle. However, to avoid any confusion by way of reverse inference, the Council is advised to simply state "Development proposals should..." rather than specifying a scale of development.</p>	However, to avoid any confusion by way of reverse inference, the Council is advised to simply state "Development proposals should..." rather than specifying a scale of development.	Yes	None Given	None Suggested	Agreed change. Re-word as stated for clarity. See proposed minor modification DM14

**Policy 22: Prevention and Remediation of Contaminated Land**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
4	32	Campaign for a Better Harrow Environm	Policy 22C		Policy 22 C (Land Contamination) needs to be strengthened. It says that proposals which fail to demonstrate that intended use would be compatible with the condition of the land or which fail to exploit appropriate opportunities for decontamination will be	Replace resisted with refused	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		ent			resisted. Again, we think that resisted should be replaced by <b>refused</b> .				d	used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.
6	47	Environment Agency	Policy 22	Yes	We strongly support this policy as it addresses the treatment of contaminated land. This is in line with the National Planning Policy Framework and will help to achieve the objectives of the Water Framework Directive.	None	Not Specified	None Given	None Suggested	Support noted

### Chapter 5: Open Space and the Natural Environment

No comments received

### Policy 23: Redevelopment of Previously-Developed Sites within Green Belt and Metropolitan Open Land

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
2	002	Harrow Agenda 21	Policy 23	No	Not consistent with national Policy as set out in Para 19 page 5 of the NPPF	None suggested	No	None given	None Sugg	The Council has considered this but disagrees

ID	Re p No .	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Chan ge	Council's Comments / Response
									ested	
2	003	Harrow Agenda 21	6	Not Stat ed	The infilling will be detrimental to wild life and really old houses and ruins will have no vehicular access. It will set precedents and cause development of out buildings such as cowsheds and barns and there will be multi development and not single dwellings	None suggested	No	None given	None Sugg ested	In accordance with the NPPF paragraph 89, infilling may be appropriate
2	004	Harrow Agenda 21	7	Not Stat ed	<p><b>NO</b> developments allowed on any ruins, if there is a risk to wildlife of any kind. We refer to the suggestion that a ruin in Pear Wood Stanmore be allowed to be pulled down and a mansion built in its place with a part of the wood leased out. The vehicular access needed would have greatly disturbed the wild life, especially that which uses the ruins for shelter.</p> <p>We talk of sustainability, we are losing animal and plant species, we need trees and greenery and peaceful places . The rich should not be able to “buy” these in the green belt denying access by the rest of the community. The value of green spaces to the physical and mental well being of the humans has been well recorded.</p> <p>There should be no further encroachment on London’s Green belt of any kind. There have been enough nibbles and one only sets a precedent and others follow, hence why there are now views of Bentley Priory from the Uxbridge Road.</p>	None suggested	No	None given	None Sugg ested	The policy is in accordance with the NPPF. Biodiversity impacts are dealt with in other policies.
2	005	Harrow Agenda	23 Secti	Not Stat	We think that Harrow College and its playing fields should be found another use and not built upon. We			None	None Sugg	Noted – sites uses are allocated in the

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		21	on C3	ed	suggest a music school; Watford has one, why cannot Harrow?			given	ested	Site Allocations DPD, and the College has been allocated for continued Education use as a minor modification in the Site Allocations DPD. Consequential changes will be made to the accompanying text to reflect this. See proposed minor modification DM15
2	006	Harrow Agenda 21	C4	Not Stated	Wood Farm in Wood lane should be left as a farm- we are losing too much agriculture land. It is difficult to believe that it cannot again be used for food production. <b>In paragraph 5.33</b> Harrow admits that there are substantial Open Space deficiencies (page 81 Chapter 5)			None given	None Suggested	Noted – sites uses are allocated in the Site Allocations DPD and this site in question has planning permission which has secured public access to open space.
3	21	Hatch End Association	Policy 23		Last line: for "spacial" substitute "special".	Suggested grammatical changes	Not Specified	None Given	None Suggested	Typographical error. Agreed change See proposed minor modification DM16

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	22	Hatch End Association	Para 5.20		The Wood Farm situation requires up-dating.	Up date the text	Not Specified	None Given	None Suggested	The current situation regarding this site is set out in the Site Allocations DPD.
16	90	Drivers Jonas Deloitte on behalf of RNOH	Policy 23	Yes	<p>Policy 23 refers to the redevelopment or infilling of strategic and other previously-developed sites in the Green Belt and Metropolitan Open Land (MOL). The Policy advises that development within the Green Belt will be supported where proposals do not have a greater impact on the openness of the site <b>having regard to:</b></p> <ul style="list-style-type: none"> <li>▪ the height of existing buildings on the site;</li> <li>▪ the proportion of the site that is already developed;</li> <li>▪ the footprint and distribution of existing buildings on the site; and,</li> <li>▪ the relationship of the proposals with any development on the site that is to be retained.</li> <li>▪ the visual amenity and character of the Green Belt and MOL;</li> <li>▪ the setting that openness provides for heritage assets within the Green Belt and MOL; and,</li> <li>▪ the contribution that the site and its</li> </ul>	None	Not Specified	None Given	None Suggested	Support Noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>surroundings make to the biodiversity.</p> <p>The Trust acknowledges the above criteria. It supports the wording of the policy which requires new development to 'have regard to', as apposed to 'be restricted by' the criteria. The Trust considers this approach is the correct interpretation of Green Belt policy contained within the NPPF, which does not seek to control the built form of new development in the Green Belt, but instead adopts a more flexible approach to the assessment of a development's impact on the openness of the Green Belt.</p> <p>The Trust supports the identification of the Royal National Orthopaedic Hospital as a strategic, previously-developed site within the Green Belt.</p>					
17	101	Greater London Authority	Policy 23 Redevelopment of previously-developed sites within Green Belt and	Yes	This policy is supported as a means of managing redevelopment at the four previously-developed sites within Green Belt/Metropolitan Open Land in the Borough. The assessment criteria are broadly supported, however, the Council is invited to consider whether the inclusion of a reference to development floorspace, under part A,c. of this policy, would provide an additional tool for assessing proposals.	The Council is invited to consider whether the inclusion of a reference to development floorspace, under part A,c. of this policy, would provide an additional tool for assessing	Yes	None Given	None Suggested	The Council believes that floorspace is not a good indicator on openness, as the NPPF removed this indicator

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
			MOL			proposals.				

#### Policy 24: Beneficial Use of the Green Belt and Metropolitan Open Land

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
2	009	Harrow Agenda 21	Policy 24	Not Stated	It is important that all Open Space is protected because Harrow is deficient of it and will be unable to meet the needs of its expected increase of population. Please refer to 5.33 There are concerns that section 106 will allow developers to promise enhancements in exchange for permission to build on too much of it. E.g. a hard all weather surface for sport .			None given	None Suggested	The policy conforms with paragraph 81 of the NPPF, and has safeguards built in. No change
7	51	Herts and Middlesex Wildlife Trust	Policy 23 and 24	Yes	It is important that the contribution that certain Green Belt sites (including previously developed land) can make to biodiversity. Planning proposals on these sites should ensure that impacts are avoided as far as possible, mitigated, and compensated for (as a last resort).  Permission should not be granted for developments on these sites if the biodiversity impact is significant, and cannot be avoided or sufficiently mitigated.	Cross reference to Policy 27.	Not Specified	None Given	None Suggested	Insert reference in the text to policy 27 and 28 in part A e to ensure biodiversity is fully recognised See proposed minor modification DM17
8	55	Kingsfield Estate	Policy 24	Yes	<b>Policy 24 is supported.</b>	None	Not Spe	None	None	Support noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Residents Action Group					specified	Given	Suggested	
16	91	Drivers Jonas Deloitte on behalf of RNOH	Policy 24	Yes	The Trust recognises the importance of Harrow's Green Belt and Metropolitan Open Land and supports the Council's approach to 'beneficial uses' on such land. The Trust is pleased to note that draft Policy 24 recognises that development proposals can present an opportunity to enhance public access and visual amenity.	None	Not Specified	None Given	None Suggested	Support Noted

#### Policy 25: Protection of Open Space

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
11	77	RP and G Ltd on behalf of Geoffrey Simm	5.31		This paragraph deals with three separate subjects relevant to open space. It should be split up to aid understanding and interpretation. There are also changes that would further aid clarity. The first part of the paragraph defines what is meant by 'open space' for the purposes of the DPD. It identifies types of open space and states that they "are protected irrespective of ownership". However, the specifics of ownership are rarely relevant to the merits of a planning proposal.	We proposed that paragraph 5.31 be reworded and restructured as follows: 5.31 In addition to the Green Belt and Metropolitan	Not Specified	None Given	None Suggested	The wording of this paragraph reflects the position in the adopted Core Strategy.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>What is relevant in this context is accessibility in terms of the degree or complete absence of access by the general public. This can be important in respect of the tests set out in the NPPF, as dealt with by the second part of paragraph 5.31. This should, though, clearly cite paragraph 74 as its source since it is important that anyone reading this should appreciate that there is a specific context in the NPPF.</p> <p>The third part of 4.31 cites Policy 7.18 of the London Plan. This is clearly more restrictive than the NPPF in its scope for justifying the loss of open space. Since it predates the NPPF it should be made clear that it has less weight as a policy consideration as a consequence.</p>	<p>Open Land, open spaces that are of local importance are identified on the Harrow Policies Map. They comprise parks and gardens, play areas, amenity spaces, natural conservation sites, playing pitches and other outdoor sports grounds, allotments and cemeteries/churchyards and are protected irrespective of accessibility.</p> <p>5.31a The National Planning Policy Framework (2012) paragraph 74 states that existing open space, sport and recreation facilities should not be built on unless one of</p>				<p>However the paragraph will be re-worded and added to as below for clarity See proposed minor modification DM18</p> <p>Harrow's local assessment shows that there is a significant qualitative short fall in accessible open space to meet the needs of the Borough's population, and for this reason the Core Strategy establishes a presumption against any net loss of open space, and with the exception of small scale ancillary facilities, resists development on</p>



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						<p>three criteria are met: the site should clearly be surplus to requirements, or the loss would be replaced by equivalent or better provision in terms of quantity and quality, or the need for and benefits of the development clearly outweigh the loss.</p> <p>5.31b Policy 7.18 of the London Plan resists the loss of local open space unless equivalent or better quality provision is made within the local catchment area.</p> <p>However, the NPPF provides additional criteria against which to assess</p>				<p>open spaces. The policies in this section give effect to the Core Strategy</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						the loss of open space. Since the NPPF post-dates the adoption of the London Plan more weight can be given to these additional criteria.				
2	011	Harrow Agenda 21	5.39	No	<p>There should be no net loss of open space as a result of configuration. We hope that the corollary of “unless there are over riding reasons in the public interest to do so “ is never put into practice and should be crossed out. Developers will promise all sorts of things and argue that what they plan is in the public's interest. Therefore we cannot agree with paragraph A : it goes against the Government NPPF Paragraphs 73, 74,78,and Harrow's Policy 25 which states” <b>A.</b> Land identified as Open Space on the Harrow Policies Map will NOT be released for development.” ( Headstone residents are now fighting the loss of Open space/playing field including tennis courts, which were wrongly excluded by a drafting error and now reinstated by order of the Ombudsman)</p> <p><b>Paragraph B subparagraph b</b> “ there will be no net loss of open space” . Surely, this refers to ALL open space, private or public. If half is built on there is a net loss. The cost of enhancement i.e. drainage, seeding and hard surfaces is too high if a net loss of space reduces the type of sport that can be played upon it- too small for football!</p>			None given	None Suggested	This re-configuration is allowed for in paragraph 74 of the NPPF and conforms with Core Strategy policies. See comment above (5.31)

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
8	56	Kingsfield Estate Residents Action Group	Policy 25 Item 4.(1)	No	we do not believe it to be compliant or sound as it goes against <b>paragraph 74</b> in the National Planning Policy Framework.	None suggested	Not Specified	None Given	None Suggested	No change – the Council believes that the policy is in conformity with the NPPF
8	57	Kingsfield Estate Residents Action Group	Policy 25 – 3	No	<b>Policy 5 – 3</b> The decision to allow building on St. Georges field is not consistent with National Policy nor, as the inspector admitted at the time, policy EP20.	None suggested	Not Specified	None Given	None Suggested	This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation The Core Strategy and this DPD address this issue and will be applicable to any future applications of this nature.
8	58	Estate Residents Action Group	Policy 25	No	We consider this should be changed so that all open space is protected from development as set out in para 74 of the NPPF. It is wrong that the inspectorate can overturn the council's decision to protect open space, as happened with St. Georges Playing Field Headstone. This private field bought by parishioners' contributions for recreation and sport, had a cricket and tennis club established in the late 1920s. Both of these clubs were harassed and caused to leave. The ground is now only used by Scouts, who have a scout hut, again bought by public contributions and	We consider this should be changed so that all open space is protected from development as set out in para 74 of the NPPF	Not Specified	None Given	None Suggested	This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation The Core Strategy and this DPD address this issue

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					help from the council, and are the only people allowed to use part of the field. The Scouts are granted short leases. There are also local people who have back garden access who are regarded as "trespassers".					and will be applicable to any future applications of this nature.
8	59	Estate Residents Action Group	Policy 25		<p><b>Paragraph B sub paragraph c</b> : we fear that this removes the protection of Open Space. In the case of St. George's playing field, over half will be developed for housing and a church car park, and the community will have only about 0.69 Hectares left, according to the Council. This area will probably be unsuitable for any sport requiring pitches, such as cricket. This goes against the inspector's wishes. When the inspector made his decision the tennis courts had been wrongly excluded from the open space, which has now been reinstated under the direction of the ombudsman. The whole field is 1.4 hectares (about 3.5 acres).</p> <p>We think that this paragraph c should be modified and not allow over half of open space to be lost, to build houses when housing targets are being met.</p>	We think that this paragraph c should be modified and not allow over half of open space to be lost, to build houses when housing targets are being met.	Not Specified	None Given	None Suggested	<p>This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation. The Core Strategy and this DPD address this issue and will be applicable to any future applications of this nature.</p> <p>Disagree – part B.b allows for reconfiguration only where there would be no net loss of open space in accordance with Core Strategy policy.</p>
8	60	Kingsfiel	Policy		We support this policy and hope that the term "	Define Function	Not	None	Non	Function and

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		d Estate Resident s Action Group	25f		inappropriate use” includes the development of housing, whatever the condition of the open space. The terms “Function and Viability” are not clearly defined . S 106 agreements with developers should not be allowed regarding Open Space , especially when the Community loses over half of it. We would like to refer to 5.33 and 5.34 and 5.35 which points out the deficiency of open space, sport and recreation grounds in the LB Harrow.	and Viability  S 106 agreements with developers should not be allowed regarding Open Space	Specified	Given	e Suggested	Viability have their normal definition  Section 106 agreements will only be made to secure public access on the basis of no net loss through this policy.
8	61	Kingsfield Estate Resident s Action Group	5.35		the last word in this paragraph should be” refused “ and not “resisted”. This is because the terms “viable” and “ function “ applied to open space is open to many interpretations. For example; St. Georges field once open for all professing members of the C.of E. is now firmly closed to the public, except for the scouts, but still functions as a wildlife haven which includes bats and birds. This field should be preserved, surely, if the government and Council are serious about sustainability and biodiversity	Substitute resisted with refused	Not Specified	None Given	None Suggested	This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation The Core Strategy and this DPD address this issue and will be applicable to any future applications of this nature.
11	78	RP and G Ltd on behalf of Geoffrey	Policy 25		Part A of this policy states that land identified as open space on the Proposals Map will not be released for development and offers no exceptions to this. Part B states that	We proposed that Policy 25 be reworded and restructured as	Not Specified	None Given	None Suggested	There is no need to repeat NPPF policy here. The purpose of policy 25 is to

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Simm			<p>the reconfiguration of open space will be supported where it meets four sub-criteria.</p> <p>Distinguishing between total loss and reconfiguration in this manner in contrary to paragraph 74 of the NPPF, the criteria of which allow the total loss in principle of an open space facility to development. Part A should therefore be subject to the criteria of paragraph 74.</p> <p>The criteria of Part B are more properly to be considered as a local interpretation of the effect of paragraph 74. In this context criteria 'b' is ambiguous and ultimately contrary to paragraph 74. This is because the latter allows the possibility of equivalent or better provision in terms of quantity and quality, which could see variations in the size, type and use of open space and any replacement or enhanced off-site facility. Given these variables there are a wide range of possible outcomes, set against which a requirement for 'no net loss' is too vague at the very least, and also contrary to paragraph 74. For example, it could be crudely interpreted as meaning that a 1ha open space requires exactly 1ha of open space to be retained in some manner, but the mere area of open space involved is not the only measure of quantity. Criteria 'b' should therefore be deleted since the NPPF criteria and others within the policy offer sufficient checks and balances.</p> <p>Part E states that "Proposals that would be harmful to open space, having regard to the criteria set out in this policy, will be refused." Part F adds: "Proposals for the inappropriate change of use of open space will be resisted." These are vague and, in any case, redundant tests. The question of whether a proposal</p>	<p>follows:</p> <p>A. Land identified as open space on the Harrow Policies Map will not be released for development unless one of the following criteria are met:</p> <p>a. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</p> <p>b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</p>			d	<p>give effect to Harrow's Core Strategy which is consistent with the NPPF and justified by robust evidence. The policy deals with 2 separate issues, reconfiguration and ancillary development in the context of a presumption against loss established in the Core Strategy</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>will be harmful to open space or inappropriate as a change of use will already have been answered by having regard to the other four parts of the policy (as relevant to the nature of any particular proposal), as well as other policies of the DPD. Parts E and F should therefore be deleted.</p>	<p>c. the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.  B. The reconfiguration of land identified as open space on the Harrow Policies Map will be supported where:  a. the reconfiguration is part of a comprehensive, deliverable scheme;  b. the reconfiguration would achieve enhancements to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure</p>				

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						<p>a viable future for the open space; and</p> <p>c. the release would not be detrimental to any environmental function performed by the existing open space.</p> <p>C. proposals for ancillary development on land identified as open space on the Harrow Policies Map will be supported where:</p> <p>a. it is necessary to or would facilitate the proper functioning of the open space;</p> <p>b. it is ancillary to the use(s) of the open space;</p> <p>c. it would be appropriate in scale;</p> <p>d. it would not detract from the</p>				



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						<p>open character of the site or surroundings; e. it would not be detrimental to any other function that the open space performs; and f. it would contribute positively to the setting and quality of the open space.</p> <p>D. Proposals that would secure the future of existing ancillary buildings on open space will be supported where:</p> <p>a. there would be no loss of necessary capacity for the proper functioning of the open space; and</p> <p>b. there would be no harm to the quality or proper</p>				

ID	Re p No .	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
						functioning of the open space as a result of the proposal.				
21	128	Sandra Lee Palmer	General / Policy 25		<p>In my opinion it is absolutely vital that <u>ALL</u> existing open spaces, parks, playing fields, sports grounds and the like are fully protected from any development. Since the 1980s we have seen far too many green open spaces lost to medium and high density development projects to the detriment of the local residents, old and new. With an ever-increasing population and fewer properties with a reasonably sized garden, we are in desperate need of open spaces where residents of all ages can go to benefit from individual and team sports and recreational activities. Open spaces are places where residents can go, indeed should go, to bond with their neighbours. Youngsters should be encouraged to be active and providing sports grounds in a clean and safe environment is key to achieving this.</p> <p>The primary concern of Harrow Council must be the residents who live and will live in the immediate vicinity, not the developers or religious groups from outside the area that wish to build on green open space rather than the many unused brownfield sites in the borough, both small and large. In such cases the sole beneficiaries are the applicants, because they always place their needs and profit targets before any possible advantage to the community.</p>	None specified	Not Specified	None Given	None Suggested	The aim of the policy is to protect open spaces, and the policy gives effect to the Core Strategy's presumption against any loss.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
21	129	Sandra Lee Palmer	General / Policy 25		<p>Two controversial decisions to build on playing fields in Harrow are the Krishna-Avanti Primary School on the William Ellis Playing Field and 27 houses and flats on St George's Playing Field. Residents fought very hard against developments on these green open spaces with full justification, but lost to the incorrect findings of the Planning Inspector. I hope that this consultation process is genuine and the Council will adopt a policy that fundamentally protects all open space in the borough, which is national and local planning policy.</p> <p>It is essential that the policy should not depend on how or when publicly or privately owned open spaces are used, or if they have been used at all in the past few years, as it is well known that owners often deliberately prevent the use of open spaces in order to justify the sale of the land. The important factor to remember is that ALL open spaces are vital to the enlarged and diverse communities and hence they have an inherent value to the neighbourhood that cannot be underestimated or even ignored.</p>		Not Specified	None Given	None Suggested	Harrow's Core Strategy, adopted February 2012, provides a clear policy basis for the protection of open space and for directing new development to brownfield land. However the decisions referred to, including that of the subject site, pre-date the Core Strategy but were made in the context of the Harrow Unitary Development Plan (2004), the remaining saved provisions of which will be superseded upon the adoption of the Development Management Policies DPD (and the AAP in respect of the Intensification Area). In the case of Kodak the open space is to be re-provided (and increased) as well

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										<p>as finding of improvements that will increase the carrying capacity of existing sports facilities.</p> <p>The allocation contained in the Site Allocations DPD reflects the planning history for this site, made under previous development plan policies, but following which there is nonetheless an approved scheme for residential development to enable the remainder of the field to be restored as open space that is accessible to the community.</p> <p><b>No change.</b></p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
21	130	Sandra Lee Palmer	General/Policy 25		<p>There is a notice outside St George's Playing Field regarding the designation of the open space as part residential and part public open space. I believe that there is a genuine deficiency of open space, sport and recreation grounds in the area when the existing and future population is considered. The enclosed open land is suitable for both children and adult team activities. Hence the entire area of St George's Playing Field should be designated public or private open space for sports or recreational activities only. Similarly, the Old Lionians Sports ground, also in Pinner View, but a larger field, is ideal for children and team sports. Both grounds have been used for decades for this purpose and the numerous new flats in the area clearly demonstrate the continued need.</p> <p>Public parks such as Harrow Recreation Ground and Headstone Manor Recreation Ground serve the residents of Harrow, not only the local residents. The Kodak Development with almost 1,000 homes, potentially some 4,000 new residents of different ages and different needs, will certainly put enormous pressure on existing public open spaces. I am bitterly opposed to any development on the greenfield site at Kodak. Why build on green open space and then expect people, especially young people, to use Headstone Manor that is oversubscribed after 4pm and at the weekends or to travel to the Roger Bannister sports ground that is some distance away? This is complete folly.</p>	None specified	Not Specified	None Given	None Suggested	See above.
22	131	Dr Dolman	Policy 25		<p>This policy states that land identified as open space on the Harrow Policies Map will not be released for development. This is essential in a borough with an increasing population and thus an increasing need for open space. However, it is necessary to emphasize the 'and' in each of A, B, C and D. Land WILL NOT be released for development (A); reconfiguration ONLY if there would be no net loss of space (B,b); C refers only to ancillary, not housing or other development.</p>	None specified	Not Specified	None Given	None Suggested	For clarity, text will be added in the reasoned justification to state that criteria B a-d are not mutually exclusive. See proposed minor modification DM19

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
22	132	Dr Dolman	Policy 25		<p>But what hope have we that these policies will actually be adhered to when we have seen what happened to my local open space, St George's Playing Field? The whole of this is designated open space (see Fig 1.2 in Area Action Plan DPD) but planning permission was granted to build houses, leaving only a small portion open and green (thus a net loss of open space, against stated policies). Even though its previous access and use by the community has now been prevented by the church (but could and should be allowed again), as section 5.2 states, even open space without community access is still of value. How can we be sure that even if the Council adheres to its own policies, a Planning Inspector who has misunderstood the local situation will not come and trample on local decisions and policies? The reasons why St George's Playing Field should not be developed are clearly set out in 5.32. Housing in the borough must be on previously developed land—development on open space must be resisted. There are other examples in the Borough, but this is the one with which I am most familiar.</p>	None specified	Not Specified	None Given	None Suggested	This relates to a planning application that has already been determined under the Harrow UDP 2004 and so is not relevant to this consultation The Core Strategy and this DPD address this issue and will be applicable to any future applications of this nature.
22	132	Dr Dolman	Policy 25		<p>In section 5.33 it is stated that the borough has a deficiency of open space. All our open space must be protected from development, as Harrow's increasing population will need it more than ever in the future, and lost open space cannot be replaced, especially in a borough with a deficiency of open space.</p>	None specified	Not Specified	None Given	None Suggested	The aim of the policy is to protect open spaces, and the policy gives effect to the Core Strategy's presumption against any loss.

**Policy 26: Provision of New Open Space**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
2	010	Harrow Agenda 21	Policy 26	Not Stated	Harrow is short of Hockey pitches. There is no mention of Lacrosse pitches. There may well be a shortage of junior football pitches when Kodak pitches are lost. Young boys and all girls are being short changed.			None given	None Suggested	Policy supports increased provision – see also policies 57-59. The use of any pitches are a management decision and outside the scope of this DPD.
10	73	Preston Bennett	Policy 26		This policy is strongly supported particularly Part A of the policy which states that proposals for major new development will be supported where they make provision for new publically accessible open space to mitigate against current deficiencies within the Borough. Where proposals for new development can achieve this, the benefits should indeed carry significant weight when ultimately determining the relevant planning application.	None	Not Specified	None Given	None Suggested	Support noted
17	102	Greater London Authority	Policy 26	Yes	This policy is supported, however, in addition to the Harrow Green Grid, the Council is invited to make reference in supporting text to the All London Green Grid SPG, which was published in March 2012.	Make reference in supporting text to the All London Green Grid SPG, which was published in March 2012.	Yes	None Given	None Suggested	This reference will be added to paragraph 5.47 for accuracy. See proposed minor modification DM20

**Policy 27: Protection of Biodiversity ad Access to Nature**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
6	48	Environment Agency	Policy 27	Yes	We support this policy and the protection of biodiversity which in line with the National Planning Policy Framework.	None	Not Specified	None Given	None Suggested	Support noted
7	52	Herts and Middlesex Wildlife Trust	Policy 27	Yes	<p>The above policy is generally supported, but could be improved and made more consistent with national policy.</p> <p>We welcome the policy to resist proposals that may adversely impact local biodiversity, and are pleased to see reference made to the Harrow BAP.</p> <p>The policy would be stronger and more in line with the NPPF (paragraph 118) if a clear hierarchy is communicated, to favour avoidance, mitigation and finally compensation for any losses of features or habitats of biodiversity value. Compensation, and in particular off-site compensation, should only be accepted exceptionally</p>	Stronger wording to communicate hierarchy of avoid, mitigate and compensate, for harm to biodiversity interests. Proposals not meeting this hierarchy and sufficiently addressing losses/damage should be refused, in line with the NPPF paragraph 118	Not Specified	None Given	None Suggested	<p>Support noted</p> <p>The introductory text to this policy covers the NPPF requirements. Agree that policy needs to include reference to mitigation. Policy text to be amended to read 'Potential impacts on Biodiversity should be avoided or appropriate mitigation sought'. See proposed minor modification DM21</p>
8	62	Kingsfield Estate Residents Action	Policy 27	Yes	We wholeheartedly support this policy and think that part of St. George's Playing Field could provide a nature reserve in a place deficient of such places. St. George's field is near the Wealdstone/Harrow	None	Not Specified	None Given	None Suggested	Support noted



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Group			intensification plan.				d	
8	63	Kingsfield Estate Residents Action Group	Policy 5.51	Yes	we support , there are bats in St. Georges field, who are probably in the loft of the Scout hut where they fled, when their ancient hedgerow in which they lived, was destroyed days before its protection by law came into force. Surely, the destruction of their environment goes against the council and the NPPF's policy on biodiversity.	None	Not Specified	None Given	None Suggested	Support noted
8	64	Kingsfield Estate Residents Action Group	5.5-5.55	Yes	<b>We also support 5.5 to, 5.55</b> inclusive; we totally support all of these .	None	Not Specified	None Given	None Suggested	Support noted

#### Policy 28: Enhancement of Biodiversity and Access to Nature

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
6	49	Environment Agency	Policy 28	Yes	We strongly support this policy and the commitment to enhancing biodiversity. This is in line with The National Planning Policy Framework.	None	Not Specified	None Given	None Suggested	Support noted
7		Herts	Policy	Yes	The above policy is generally supported, but could be	Policy wording	Not	None	Non	Support noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		and Middlesex Wildlife Trust	28		<p>improved and made more consistent with national policy</p> <p>We welcome this encouragement for proposals to enhance local biodiversity. It is positive to see the various ways this can be achieved listed, as this adds clarity and substance to the policy. However, it is advised that the policy wording is adjusted or added to, in order to communicate that certain 'enhancements' are more valuable than others. Higher value enhancements should be expected in larger scale developments, where the potential opportunities are greater, and where the potential adverse impacts of the development are greater. Lower impact options in isolation, such as installing bird and bat boxes, would only be sufficient for householder and minor applications, where the impacts are less and opportunities more constrained.</p> <p>It would be beneficial also to communicate in the body text that enhancement proposals should be informed by ecological surveys of the site and surrounding areas, which would reveal where the potential opportunities lie.</p> <p>Proposals should seek to make maximum beneficial impact to the local ecological network. This is facilitated through early discussions and integrating the concepts of landscape-scale, ecosystem based conservation, at an early point in proposal development.</p>	<p>should be adjusted or added to, in order to communicate that certain 'enhancements' are more valuable than others. Higher value enhancements should be expected in larger scale developments, where the potential opportunities are greater, and where the potential adverse impacts of the development are greater. Lower impact options in isolation, such as installing bird and bat boxes, would only be sufficient for householder and minor applications,</p>	Specified	Given	e Suggested	<p>The types of enhancements that are needed / possible, depend on the developments context and size – to be determined at application stage.</p> <p>Harrow's Biodiversity Action plan has a range of improvements that will inform decisions.</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						<p>where the impacts are less and opportunities more constrained.</p> <p>It would be beneficial also to communicate in the body text that enhancement proposals should be informed by ecological surveys of the site and surrounding areas, which would reveal where the potential opportunities lie.</p>				
8	65	Kingsfield Estate Residents Action Group	Policy 28,30,31 and 45	Yes	We wholeheartedly support all of these policies.	None	Not Specified	None Given	None Suggested	Support noted

**Policy 29: Pinner Chalk Mines**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	103	Greater London Authority	Policy 29 Pinner Chalk Mines	Yes	This policy is supported, however, for referencing purposes the Council should note that revised strategic guidance "Green infrastructure and open environments: London's foundations: Protecting the geodiversity of the capital" was published in March 2012.	For referencing purposes the Council should note that revised strategic guidance "Green infrastructure and open environments: London's foundations: Protecting the geodiversity of the capital" was published in March 2012.	Yes	None Given	None Suggested	Reference to the document will be added for accuracy. See proposed minor modification DM22

### Policy 30: Trees and Landscaping

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
7	53	Herts and	Policy 30	Yes	The above policy is generally supported, but could be improved and made more consistent with national	"The design and	Not Spe	None	None	Tree preservation orders can only be

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Middlesex Wildlife Trust			<p>policy.</p> <p>This policy should recognise more explicitly the biodiversity value of trees, as well as their amenity value.</p> <p>In some cases, trees judged of low value against arboricultural or amenity criteria can be of great value for wildlife. For instance rot holes, cracks and crevices in old, mature trees provide potential nesting sites for birds like woodpeckers and roosting sites for bats. Rotting wood also supports a large diversity of invertebrate species, which themselves attract other animals to the tree. The biodiversity value of trees should be considered before they are scheduled for removal. Proposals should seek to retain mature trees with characteristics attractive to wildlife, as well as standing and fallen dead wood (health and safety considerations permitting). Where trees are removed, the felled wood and other dead wood should be retained on site, to create habitat for wildlife such as invertebrates, amphibians and small mammals.</p> <p>It is positive to see that the policy encourages landscaping which will benefit biodiversity.</p>	<p>layout of development on sites where there are existing trees should secure the retention and survival of any trees the subject of tree preservation orders and others of significant amenity <u>or biodiversity</u> value.</p> <p>Proposals that would lead to the unnecessary removal of any trees the subject of tree preservation orders and others of significant amenity <u>or biodiversity</u> value, or which would prejudice</p>	<p>ified</p>	<p>Given</p>	<p>Suggested</p>	<p>placed based on amenity value. Therefore the policy would not be sound if the Council sought to place TPO's based on biodiversity value.</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						their survival, will be resisted.”				
8	65	Kingsfield Estate Residents Action Group	Policy 28,30,31 and 45	Yes	We wholeheartedly support all of these policies.	None	Not Specified	None Given	None Suggested	Support noted
9	67	GVA on behalf of Marylebone Property Investments	Policy 30	No	Policy 30 is unsound because it is not effective. Policy 30 supports the retention and survival of trees that are the subject of tree preservation orders and others of significant amenity value. We would suggest that some flexibility is used in the wording of this policy to ensure that their value is balanced against the wider benefits proposed by developments.	We would suggest that the following wording is used: <i>(A) The design and layout of development on sites where there are existing trees should secure the retention and survival of any trees the subject of tree preservation orders and others of significant amenity value, unless their retention is outweighed by</i>	Not Specified	None Given	None Suggested	The Policy will be amended to delete the second sentence of part A and replace it with text as a new part B for clarity. This will state “The removal of trees subject to TPOs or assessed as being of significant amenity value will only be considered acceptable where it can be demonstrated that the loss of the tree(s) is outweighed by the wider public benefits of the proposal”. This will ensure flexibility

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						<i>the overarching benefits of the development'.</i>				where needed.
16	92	Drivers Jonas Deloitte on behalf of RNOH	Policy 30		<p>Policy 30 'Trees and Landscaping' seeks to secure the retention and survival of any trees that are subject to a Tree Preservation Order (TPO) or significant amenity value. At present, draft Policy 30 states that development proposals that would result in the unnecessary removal of any trees the subject of TPOs will be resisted.</p> <p>Whilst the Trust recognises the significance of protected trees, there are instances where it may be necessary to remove trees, even those with TPOs, in order to facilitate the delivery of more rational design solutions.</p>	Flexibility in policy to remove protected trees	Not Specified	None Given	None Suggested	The Policy will be amended to delete the second sentence of part A and replace it with text as a new part B for clarity. This will state "The removal of trees subject to TPOs or assessed as being of significant amenity value will only be considered acceptable where it can be demonstrated that the loss of the tree(s) is outweighed by the wider public benefits of the proposal". This will ensure flexibility where needed.
17	104	Greater London Authority	Policy 30 Trees and Lands	Yes	This policy is supported, however, the Council is advised that in July 2012 the Mayor published Green infrastructure & open environments: Preparing borough tree and woodland strategies SPG. The Council may wish to include a reference to this	The Council is advised that in July 2012 the Mayor published Green	Yes	None Given	None Suggested	Reference will be added for users information.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
			caping		strategic guidance within the supporting text to this policy.	infrastructure & open environments: Preparing borough tree and woodland strategies SPG. The Council may wish to include a reference to this strategic guidance			d	

#### Policy 31 Streetside Greenness and Forecourt Greenery

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
8	65	Kingsfield Estate Residents Action Group	Policy 28,30,31 and 45	Yes	We wholeheartedly support all of these policies.	None	Not Specified	None Given	None Suggested	Support noted

#### Chapter 6: Housing

No comments received



**Policy 32: Housing Mix**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	105	Greater London Authority	Policy 32 Housing Mix	Yes	Officers note that the Council intends to prepare a Planning Obligations SPD which will include details of the target affordable housing mix to be sought as part of private residential development schemes. Officers also note that the target mix will be informed by the Council's Housing Strategy, which will undergo regular review. Policy 32 effectively states that an appropriate mix of housing will be determined having regard to the Planning Obligations SPD, the need to prioritise family housing, and the site's characteristics and context. As written, Policy 32 is in general conformity with the London Plan. However, the Council is advised that, for the future Planning Obligations SPD to be in general conformity with the London Plan, it must not compromise operation of the affordable rent product by setting out threshold rent/income levels. The same principles also apply to the Council's Housing Strategy and Tenancy Strategy referred to in paragraph 6.5 of this chapter.	None	Yes	None Given	None Suggested	Noted

**Policy 33: Office Conversion**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
9	68	GVA on behalf of Marylebone	Policy 33	No	Policy 33, Part (d) is not sound because it is not effective. In instances where the demolition and redevelopment of redundant office buildings is not feasible, we would	We would instead suggest that the following wording is	Not Specified	None Given	None Suggested	The Council expects all development to meet the highest

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Property Investments			welcome the policy support for the conversion of office uses to residential as set out in Policy 33. However, Part (d) of the policy states that proposed apartments should be dual aspect wherever possible, and that a sole aspect apartment overlooking a parking court or other shared use rear area would generally be unacceptable. We consider that this level of detail does not provide sufficient flexibility for the conversion of existing buildings to residential uses. Opportunities to retain embodied energy within buildings should be explored, but the process of converting existing uses can result in constraints on design. Furthermore, detailed guidance in relation to housing design is set out within the Mayor's Supplementary Planning Guidance on Housing and within the London Housing Design Guide.	used: (d) Proposed apartments should be dual aspect where the form of the building allows. <del>A sole aspect apartment into a parking court or other shared use rear area will generally be unacceptable</del>			d	amenity standards, what is applicable to new build is also applicable to conversions. The policy has sufficient flexibility by use of the words 'generally be unacceptable' This does not completely preclude sole aspect developments. The retention of the full wording is necessary to ensure that wherever it is possible to achieve dual aspect, it is done.
10	74	Preston Bennett	Policy 33		As with Policy 2 above, the general objectives and intention of this policy are fully supported, and are considered to be an appropriate and potentially effective means of ensuring both delivery of additional housing, and the re-use of otherwise redundant property. However, it is reiterated that there needs to be a degree of flexibility when it comes to the application of Lifetime Homes Standards, to ensure that suitable development is held back from delivery. Part B of Policy 33 states that Lifetime Homes Standards need to be complied with. As above, the onus should be on the applicant	there needs to be a degree of flexibility when it comes to the application of Lifetime Homes Standards, to ensure that suitable development is held back from	Not Specified	None Given	None Suggested	This is a London plan and Core Strategy requirement. Harrow's Residential Design Guide gives detail on its implementation

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>to demonstrate what standards are met, and which aren't, together with full and reasoned justification for the latter without any shortfall necessarily automatically resulting in an unacceptable proposal.</p> <p>It is also considered that this policy and / or the supporting text should take account of the new guidance issued by Government on 6<sup>th</sup> September which included specific information on 'getting empty offices into use' which will expand permitted development pursuant to such proposals.</p>	<p>delivery.</p> <p>It is also considered that this policy and / or the supporting text should take account of the new guidance issued by Government on 6<sup>th</sup> September which included specific information on 'getting empty offices into use' which will expand permitted development pursuant to such proposals.</p>				<p>At the current time this is only a proposal. Consideration will be given to this if it is implemented.</p>
17	106	Greater London Authority	Policy 33 Office conversions	Yes	This policy is supported as a means of managing the Borough's supply of office space outside of the Harrow and Wealdstone Intensification Area, and, where appropriate, promoting redevelopment/conversion for residential uses.	None	Yes	None Given	None Suggested	Support Noted

### Policy 34: Conversion of Houses and Other Residential Premises

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
4	33	Campaign for a Better Harrow Environment	Policy 34		c) Policy 34 supports the conversion of houses into multiple units. It lists criteria concerning the quality of conversions and the effects on neighbouring residents and admits (in paragraph 6.27) that further harm to the character of areas that have already experienced high conversion rates should be avoided. We agree with this, but there is no indication as to how this policy will be implemented. In order to be effective conversion rates must be carefully monitored and controlled not only in areas already damaged but also in areas where present rates are low but likely to rise under pressure for development.	Include monitoring proposals to demonstrate how this policy would be implemented	Not Specified	None Given	None Suggested	Disagree. Paragraph 6.27 seeks to highlight that where an area has suffered from poor conversions in the past does not set a precedence for future conversions.
8	66	Kingsfield Estate Residents Action Group	Policy 34		Preferably parking should be on site and not overflow onto the road. Parked cars are a hazard for cyclists.	Specify parking to be on site.	Not Specified	None Given	None Suggested	Assessment of adequacy of parking arrangements is set out in Policy 53.

### Policy 35: Amenity Space

No comments received

### Policy 36: Protection of Housing

No comments received

### Policy 37: Children and Young People's Play Facilities

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	23	Hatch End Association Hatch End Association	Policy 37		COMMENT First line reads "...a net increase in child yield..."; para. 6.53 first line reads "...an increase in child yield numbers...". In general, "child numbers" might be simpler here and elsewhere.	Suggested grammatical changes	Not Specified	None Given	None Suggested	Remove the word 'numbers' for clarity. Child yield is a known planning term.
4	34	Campaign for a Better Harrow Environment	Policy 37		<p>d) Policy 37 deals with the increased need for play areas for children and young people resulting from residential developments. It states that a financial contribution to improvement of existing local facilities will be sought from developers, where these cannot be provided on site. This policy may work in some parts of the Borough but there is a danger that it may result in the over use of facilities close to the Intensification Area, where the pressure of increased population density will be much higher. This should be acknowledged in policy 37 and the option of contributing to the provision of additional space introduced. We suggest the following additional clause:</p> <p>'D. If the existing play facilities have already reached full capacity, contributions will be sought to equip new space.'</p>	<p>Add following clause to policy:</p> <p>D. If the existing play facilities have already reached full capacity, contributions will be sought to equip new space.'</p>	Not Specified	None Given	None Suggested	<p>The policy seeks on site provision. Where this is not achievable any off site provision would be expected to take into account existing supply and demand, and so meet the additional demand through increased provision off site where not feasible on site.</p> <p>For clarity, textual change in part A to replace the word 'expected' to 'required'.</p> <p>Text to be added in the R.J after the word 'sought' to state," Offsite provision, including the creation of new</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										facilities; improvements to existing provision; and/or an appropriate financial contribution secured by legal agreement towards this provision may be acceptable where it can be demonstrated that it fully satisfies the needs of the development whilst continuing to meet the needs of existing residents.”
17	107	Greater London Authority	Policy 37 Children and Young People's Play Facilities	Yes	This policy is supported. However, for referencing purposes the Council should note that revised draft strategic guidance “Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation” was published in February 2012.	For referencing purposes the Council should note that revised draft strategic guidance “Shaping Neighbourhoods : Children and Young People’s Play and Informal Recreation” was published in February 2012.	Yes	None Given	None Suggested	Reference to be added for clarity

**Policy 38: Sheltered Housing, Care Homes and Extra Care Housing**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
10	75	Preston Bennett	Policy 38		We fully support the Council's stance that such facilities are to be supported where they are proposed on previously-developed land.	None	Not Specified	None Given	None Suggested	Support noted

**Policy 39: Large Houses in Multiple Occupation, Hostels and Secure Accommodation**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	24	Hatch End Association	Para 6.58		The Council's definition of "secure accommodation" in its change of use classification might help here.	Add definition	Not Specified	None Given	None Suggested	This is explained in paragraph 6.58

**Chapter 7: Employment and Economic Development**

No comments received

**Policy 40: Supporting Economic Activity and Development**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
9	69	GVA on behalf of Marylebone Property Investments	Policy 40	No	Parts (E. b) and (F) of Policy 40 are not sound because they are not consistent with national policy. The National Planning Policy Framework sets out that 'planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose' (Para 22). Part (E) of Policy 40 sets out the definition of surplus industrial and business use land and floorspace. However, Part (b) of this section states that floorspace will only be considered surplus to requirements where 'the assessment of demand and supply demonstrates that there are no other, sequentially more preferable sites that are surplus to requirements'. We consider that the inclusion of Part (E. b) would preclude suitable sites that are readily available from being developed for alternative uses and should be removed. We would also suggest that Part (F), which sets out the sequential order of preference for site release is also deleted.	We consider that the inclusion of Part (E. b) would preclude suitable sites that are readily available from being developed for alternative uses and should be removed. We would also suggest that Part (F), which sets out the sequential order of preference for site release is also deleted.	Not Specified	None Given	None Suggested	Part E.b to be amended to read "the assessment of supply and demand demonstrates that there are no other sequentially less preferable sites that are surplus to requirements" This is to rectify a mistake replacing the word "more" with "less".  Regardless of this minor wording change, the intent of the policy remains the same, to protect employment land that is in use or where there is a demand for it. The release criteria are necessary to ensure that land that is least desirable and thus a low reasonable chance of it being used for future employment purposes is released over land



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										that has higher prospects of being utilized for employment uses. This level of protection and the release criteria are in conformity with the NPPF as the policy allows for the release of sites that are no longer required, thus avoiding long term protection of employment land where there is no reasonable prospect of it being used for that purpose. No change.
17	108	Greater London Authority	Policy 40 Supporting Economic Activity and Development	Yes	The promotion of appropriate Industrial Business Park uses within the Honey Pot Lane SIL is supported.	None	Yes	None Given	None Suggested	Support Noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
18	120	CGMS on behalf of the Metropolitan Police	Policy 40	Yes	The MOPAC/MPS support part G and H of Policy 40 which allow essential community infrastructure such as police patrol bases and custody centres to be provided on sites that are industrial and business sites that are surplus to requirements and support proposals that meet the infrastructure needs of emergency services where there is a proven need for that facility. This is consistent with the prevailing planning policy framework, in particular Policy 2.17 of the London Plan. This should therefore be retained.	None	Not Specified	None Given	None suggested	Support Noted

#### Policy 41: Town Centre Offices and Northolt Road Business Use Area

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
9	70	GVA on behalf of Marylebone Property Investments	Policy 41		Further clarity is required to ensure that Part (B) of Policy 41 is effective. We welcome the provisions for redevelopment or change of use of purpose-built offices in town centres where buildings are no longer fit for office occupation and it is demonstrated that there is a surplus of office space throughout the Borough, as set out in Policy 41. Part (B), however, states that proposals for comprehensive redevelopment or change of use of buildings which provide over 1,000 square metres of office floorspace will be required to make viable provision for replacement office space or other appropriate economic uses. The wording of Part (C),	We would instead suggest that the following alternative wording is used: <i>(B) 'Within Intensification Areas, proposals for the comprehensive redevelopment or change of</i>	Not Specified	None Given	None Suggested	Part B applies across the Borough Paragraph 7.36 explains the amount of floorspace that could be required.  For clarity in part B add the word 'existing' before buildings and remove 'which

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
					'in other locations beyond the Intensification Area' suggests that, Part (B) relates to areas within the Intensification Area, and this should be clarified. Furthermore, should the existing office floorspace referred to in Part (B) be surplus, we would suggest that there would not be a requirement for this floorspace to be reprovided elsewhere within the Borough.	<i>use of buildings which provide 1,000 or more square metres of office floorspace will be required to make viable provision for replacement office space or other appropriate economic uses, unless an assessment of demand and supply demonstrates that there is surplus office space in the Borough, taking into account any unimplemented planning permissions'.</i>				provide' and replace with 'of'.  Add sub heading before part C to state Offices outside of town centres  Part C to be reworded to clarify that it refers to offices that are not in town centre locations or within the Northolt Road business use area.

**Policy 42: Managing Economic Activities and Development**

No comments received

**Policy 43: Working at Home**

No comments received

**Policy 44: Hotel and Tourism Development**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	109	Greater London Authority	Policy 44 Hotel and Tourism Development	Yes	In line with previous representations, the inclusion of the strategic target that hotels should achieve a minimum 10% provision of wheelchair accessible rooms is supported.	None	Yes	None Given	None Suggested	Support Noted

**Policy 45: Loss of Public Housing**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
8	65	Kingsfield Estate Residents Action Group	Policy 28,30,31 and 45	Yes	We wholeheartedly support all of these policies.	None	Not Specified	None Given	None Suggested	Support noted
10	76	Preston Bennett	Policy 45		The supporting text to this policy states that the test related to 'criteria b' to demonstrate that the current pub use is no longer viable should include marketing evidence over a period of two years. It is considered that this is too long and has the potential to allow a	Marketing period should be 6 – 12 months	Not Specified	None Given	None Suggested	Agreed – change to “12 months”.

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					property to easily fall in to a state of unviable economic repair. It is accepted that marketing (presenting a robust marketing case) over a reasonable period is appropriate, but it is strongly considered that this should be a minimum of 6 months up to 12 months, a period that is accepted as appropriate elsewhere in the DPD within policies assessing the change of use of shops (Policy 50). There is a lack of justification as to why, in the case of public houses, the marketing evidence to justify a change of use should be double that of retail uses.				d	
13	85	Stewart Braddock – Croft Partnership	7.46	No	The period for marketing should be reduced to a minimum of 12 months. Lack of Viability will be proven within this timescale and 24 months is unjustified.	Proposals for the change of use or redevelopment to uses that do not make provision for evening economy uses or community uses, as appropriate under criterion (a), will only be accepted where it has been demonstrated that the pub is no longer economically viable and that reasonable attempts have been made to	Not Specified	None Given	None Suggested	Agreed – change to 12 months

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						market the site to other operators for re-use as a public house. Supporting evidence should include details of the appointment of a property consultant/estate agent to handle the marketing of the property, and records of where and how the property has been marketed for a minimum of one year.				

### Chapter 8: Town Centres and Neighbourhood Parades

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
12	81	RPS on behalf of Pearson	8.5	No	Paragraph 8.5 of the draft DMP consultation document refers to the National Planning Policy Framework's (NPPF) requirement for a sequential	Paragraph 8.5 of the DMP document	Not Specified	None Given	None Sugg	The retail note at the end of this schedule sets out

ID	Rep No	Organisation Details	Para	Sou nd	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Pension Property Fund			<p>approach to locating retail and leisure developments, firstly considering sites within town centres, followed by edge-of-centre locations. The paragraph states that only if suitable sites within town or edge-of-centre locations cannot be found then out-of-centre locations will be considered to ensure that development needs are met.</p> <p>RPS considers that for the DPD to comply with the Government's guidance within the NPPF and the 'presumption in favour of sustainable development', appropriate and sustainable sites in out-of-centre locations which would support local communities should be considered for retail development to contribute towards the Borough's needs.</p> <p>The NPPF recognises out-of-centre sites as legitimate locations for retail use in the absence of suitable and available town centre or edge-of-centre sites. The DMP document should similarly recognise the contribution that such sites can make to meeting retail floorspace needs.</p> <p>As the site currently has consent for A1 retail and the sale of non-food comparison goods, is adjacent to an existing foodstore and other employment units within the South Harrow Industrial Estate, the site is considered to be an appropriate location for additional retail sales of a convenience or comparison nature.</p> <p>The 2009 Harrow Retail Study undertaken by NLP, which updates the 2006 Study, predicts that there will be a retail requirement of 38,912sqm comparison and 5,261sqm convenience floorspace by 2025. However, as indicated in the Site Allocations DPD, this excluded the following approvals:</p> <ul style="list-style-type: none"> <li>□ Extension of Tesco store, Station Road of 2,368sqm net comparison and 651sqm net convenience floorspace;</li> </ul>	should be reworded to acknowledge that some further out-of-centre sites are required to meet the retail needs to support the predicted future population increase of Harrow.	d		este d	<p>how the pipeline supply of retail development and allocations in the Site Allocations DPD and the AAP meets and exceeds the projected need for additional convenience retail floorspace over the period 2009-2025, and how the need for comparison retail floorspace will be met over the short to medium term (2009-2020) and the policy provisions made in the event of longer term need being realised (2020-2025).</p> <p>In response to this contributor's representation to the Site Allocations DPD pre-submission consultation, the introductory text of that DPD has been revised to provide greater clarity on</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>□ Neptune Point supermarket of 3,440sqm gross convenience and 560sqm gross comparison floorspace; and</p> <p>□ 1,000sqm A1-A5 uses at Harrow View, Wealdstone.</p> <p>Despite these proposed developments there is still a significant requirement required for the plan period. Proposed site allocations provide a total of 8,500sqm retail floorspace. It is therefore evident that a greater number of sites are required to ensure both convenience and comparison goods floorspace requirements of approximately 44,173sqm by 2025 can be met.</p> <p>RPS, therefore, considers that the Retail Park should be recognised by the Council as an appropriate location for additional retail development, which would not cause any harm to neighbouring District centres, and should be considered as a preferable out-of-centre site where additional retail use is supported.</p>					<p>how retail development needs are to be met.</p> <p>The Council can demonstrate a sufficient supply of pipeline and allocated sites to meet and exceed the projected need for convenience retail floorspace over the period 2009-2025. Policy 46(B) of the Development Management Policies DPD sets out criteria for the consideration of new retail development in out of centre locations and therefore allows for any retail development associated with the higher (long range) comparison floorspace projections – in the event that they are sustained following a review of the Retail Study - to</p>



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										come forward during the plan period. <b>No change.</b>

#### Policy 46: New Town Centre Development

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
4	35	Campaign for a Better Harrow Environment	Policy 46		Policy 46 prioritises the selection of sites for retail and leisure proposals throughout the Borough. There is strong economic justification for focusing these developments in town centres in order to strengthen their ability to attract custom but it is acknowledged that edge of centre and out of centre sites will be considered in the event that no site within a centre is suitable. We agree with the general strategy but feel that economic considerations are not the only ones for sites on the edge of centre or out of centre: the effect on existing neighbouring residential areas should also be taken into account. We therefore suggest adding 'or neighbouring residents' to the last sentence of clauses Ab and Bd which deal with the potential harm of developments in these locations.	We therefore suggest adding 'or neighbouring residents' to the last sentence of clauses Ab and Bd which deal with the potential harm of developments in these locations.	Not Specified	None Given	None Suggested	This is covered by Policy 1 C and so does not need adding here.
12	82	RPS on behalf of Pearson Pension	8.8	No	Paragraph 8.8 of the draft DMP consultation document provides justification for Policy 4.6, and refers to the sequential approach for site selection for retail proposals. The paragraph indicates that sites	The DMP document should be flexible in	Not Specified	None Given	None Suggested	The retail note at the end of this schedule sets out how the pipeline

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
		Property Fund			<p>within 300m of Primary Shopping Areas or within the boundary of town centres are the most sequentially preferable locations for development. It also states that proposals in edge-of-centre or out-of-centre locations need to demonstrate that there are no other sequentially preferable sites available.</p> <p>Whilst RPS agrees that a sequential approach to retail development should be applied, sustainable sites outside of the town or district centres which are already within retail use should not be discounted by the Council as suitable development sites. The National Planning Policy Framework recognises that out-of-centre sites are appropriate for retail development if there are no other suitable in- or edge-of-centre locations available to meet identified retail needs.</p> <p>In relation to this, RPS considers that the Northolt Road Retail Park, which is more than 300m from the South Harrow Primary Shopping Area but which has consent for A1 use and non-food comparison goods and is adjacent to an existing foodstore, should be recognised as a suitable location for contributing towards the Borough's convenience goods floorspace needs.</p> <p>It is evident that the Council require additional retail floorspace to be delivered in the plan period to meet the predicted need of approximately 44,173sqm convenience and comparison goods floorspace, than is currently available to meet the identified requirements of Harrow.</p> <p>As the Retail Park is 340m from the District Centre and only approximately 400m from the Primary Shopping Area, and due to the sites current and adjacent uses, it should be considered as a preferable out-of-centre site where additional retail</p>	<p>relation to retail site selection as there is an identified future need for approximately 44,173sqm convenience and comparison goods floorspace to 2026, which cannot be currently met through existing allocations and commitments. Therefore, additional sites outside of the sequentially preferable locations of District Centres and Primary Shopping Areas, such as the Northolt Road Retail Park, should be recognised as suitable and sustainable locations for</p>			d	<p>supply of retail development and allocations in the Site Allocations DPD and the AAP meets and exceeds the projected need for additional convenience retail floorspace over the period 2009-2025, and how the need for comparison retail floorspace will be met over the short to medium term (2009-2020) and the policy provisions made in the event of longer term need being realised (2020-2025).</p> <p>In line with national planning policy, the DPD seeks to direct new retail development first to in-centre, and then edge of centre locations. Also consistent with national planning policy, Policy 46 of the DPD sets out</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					use is supported.	contributing towards this required floorspace. These sites should be considered favourably by the Council for additional retail development rather than only				<p>criteria for considering out of centre proposals. Paragraph 8.9 of the DPD states that out of centre development will be resisted except as a last resort to meeting need for additional retail capacity. The council considers that this is consistent with paragraph 23 of the NPPF which states that local planning authorities should <i>'set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres'</i>.</p> <p>The site is out of centre and in the Council's view it would be inappropriate to identify it for development within the retail</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										development policy or reasoned justification of the DPD. <b>No change.</b>
12	83	RPS on behalf of Pearson Pension Property Fund	8.9	No	<p>Paragraph 8.9 refers to out-of-centre retail developments posing the greatest threat to the vitality and viability of Town Centres, particularly comparison goods retailing. The National Planning Policy Framework recognises that out-of-centre sites are appropriate for retail development if there are no other suitable in- or edge-of-centre locations available to meet identified retail needs and that such need must be met in full. RPS therefore considers that the Council should not resist development outside of town and district centres, particularly where retail uses already exist. It is evident that the Council requires additional retail floorspace to be delivered in the plan period to meet the predicted need of approximately 44,173sqm convenience and comparison goods floorspace, and to support the anticipated future population growth of Harrow. Therefore, it is considered that the Council should adopt a more flexible approach to retail site selection to enable additional sustainable sites to come forward to meet this predicted need.</p> <p>RPS considers that the Northolt Road Retail Park, which is 400m from the South Harrow Primary Shopping Area, but which has consent for non-food open A1 use, and is adjacent to an existing foodstore, should be recognised as a preferable out-of-centre location. The Retail Park currently has consent for the sale of non-food comparison goods,</p>	Additional sites outside of District Centres and Primary Shopping Areas, such as the Retail Park, should be recognised as suitable and sustainable locations for contributing towards the comparison and convenience goods floorspace required for the plan period. The DMP document should acknowledge that the out-of-centre sites are legitimate and suitable in providing retail floorspace, as	Not Specified	None Given	None Suggested	In line with national planning policy, the DPD seeks to direct new retail development first to in-centre, and then edge of centre locations. Also consistent with national planning policy, Policy 46 of the DPD sets out criteria for considering out of centre proposals. Paragraph 8.9 of the DPD states that out of centre development will be resisted except as a last resort to meeting need for additional retail capacity. The council considers that this is consistent with paragraph 23 of the NPPF which states that local planning

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
					<p>and it is considered than additional and replacement food sales would not cause a significant impact in relation to traffic to the site, and technical reports could be undertaken to demonstrate this. Therefore, it is considered that the site should be recognised due to its good accessibility and proximity to other retail uses and the District Centre, as a preferable location for contributing towards the Boroughs convenience goods floorspace needs, or for additional comparison goods floorspace.</p>	<p>indicated in the National Planning Policy Framework, when there is a lack of in- and edge-of-centre locations available to meet identified retail floorspace requirements. The Retail Park therefore should be considered favourably by the Council for additional retail development rather than only being considered where no other sequentially preferable sites are available.</p>				<p>authorities should <i>'set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres'</i>.</p> <p>The retail note at the end of this schedule sets out how the pipeline supply of retail development and allocations in the Site Allocations DPD and the AAP meets and exceeds the projected need for additional convenience retail floorspace over the period 2009-2025, and how the need for comparison retail floorspace will be met over the short to medium term (2009-2020) and the policy provisions made in the event of longer term need being realised (2020-</p>

ID	Re p No .	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
										2025).  The site is out of centre and in the Council's view it would be inappropriate to identify it for development within the retail development policy or reasoned justification of the DPD. <b>No change.</b>
12	84	RPS on behalf of Pearson Pension Property Fund	Policy 46	No	<p>Whilst RPS agrees that new retail proposals are consistent with the use and function of centres, the Borough's spatial strategy, and a sequential approach to site selection, it is considered to be inappropriate for sites particularly in out-of-centre locations to be discounted for retail uses where there is a recognised need for additional retail floorspace to be provided.</p> <p>It has been demonstrated that the Council requires 38,912sqm net comparison and 5,261sqm net convenience floorspace by 2025, as the 2009 Harrow Retail Study predicts. However, this is a year short of the plan period, and the Council only has a supply of approximately 16,000sqm retail floorspace through existing commitments and proposed site allocations as indicated in the Site Allocations Development Plan Document.</p> <p>Whilst the Harrow and Wealdstone Area Action Plan proposes to allocate a number of sites to contribute</p>	The DMP document should be more flexible in terms of consideration of less sequentially preferable out-of-centre sites, particularly which already are in retail use, to ensure that the predicted future retail floorspace needs to 2026 are met.	Not Specified	None Given	None Suggested	The retail note at the end of this schedule sets out how the pipeline supply of retail development and allocations in the Site Allocations DPD and the AAP meets and exceeds the projected need for additional convenience retail floorspace over the period 2009-2025, and how the need for comparison retail floorspace will be met over the

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
					<p>towards comparison retail sales and additional convenience, the exact amount of both comparison and convenience floorspace which could be delivered has not been determined. It is unclear whether the Council could accommodate all of the required 44,173sqm on the proposed site allocations and existing commitments, and therefore additional sites should be considered in addition to these to ensure that the Borough's future retail needs are met. RPS considers that a more flexible approach to retail site selection should be encouraged by the Council to enable suitable sites to come forward in less sequentially preferable locations to meet these retail needs, such as out-of-centre sites. This is so that the DMP document complies with the National Planning Policy Framework, which recognises that out-of-centre sites are suitable for retail development where there is a lack of other sites available.</p> <p>The Northolt Road Retail Park is in close proximity to South Harrow District Centre and the Primary Shopping Area. The site currently has consent for the sale of nonfood open A1 use, and it is considered that additional food sales would not cause a significant impact in relation to traffic to the site. Therefore, it is considered that the site should be recognised due to its good accessibility and proximity to other retail uses and the District Centre, as a preferable out-of-centre location for contributing towards the Boroughs comparison and convenience goods floorspace needs.</p>					<p>short to medium term (2009-2020) and the policy provisions made in the event of longer term need being realised (2020-2025).</p> <p>Policy 47 provides robust criteria for new retail development to come forward in out of centre locations only when a search for in-centre and then edge-of-centre sites has been exhausted. The Council considers this approach to be consistent with the NPPF.</p> <p>The site is out of centre and in the Council's view it would be inappropriate to identify it for development within the retail development policy or reasoned justification of the DPD.</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
										<b>No change.</b>
19	125	NLP on behalf of Capital Shopping Centres	Policy 46 Section C	No	<p>CSC considers that section C of Policy 46 is inconsistent with the NPPF and is therefore unsound and should be deleted. Section C states that “retail, leisure and cultural development including extensions of 400 sqm or less will be assessed without the need for a sequential assessment”. From the supporting text (paragraph 8.10) it is understood that this exception has been included to facilitate the provision of local shops and facilities to meet the needs of future residents and employees associated with large scale residential / economic development.</p> <p>In its current form, policy 46 could give rise to significant out of centre retail development, which would be detrimental to the overall aims of the DPD which is to enhance the vitality and viability of defined centres.</p> <p>Paragraph 24 of the NPPF requires that the sequential test is applied to planning applications for main town centre uses that are not in an existing centre. Whilst paragraph 26 of the NPPF states that local authorities may wish to set a local threshold where impact assessments will not be required, with the exception of small scale rural development (paragraph 25), the NPPF does not permit similar thresholds where the sequential test will not be required.</p> <p>Policy 46 is therefore inconsistent with national policy and is therefore unsound.</p>	<p>To ensure that the policy is consistent with national policy CSC considers that section C of policy 46 should be deleted:</p> <p>“Retail, leisure and cultural development including extensions of 400 sqm or less will be assessed without the need for a sequential assessment.”</p> <p>This will not preclude appropriate retail facilities coming forward as part of large scale redevelopment schemes as long as the applicant demonstrates that the need</p>	Not Specified	None Given	None Suggested	<p>The NPPF does not preclude Council's from setting a figure where sequential assessments will be needed. This figure will allow for small scale extensions to existing retail premises, without the need for a sequential assessment which would be unduly burdensome for this scale of development.</p> <p>However the policy will be amended to state ‘within town centre boundaries or designated neighborhood parades’ and the threshold reduced to 100sqm to allay concerns about the impacts .</p> <p>Consequential</p>



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						would not be met on any other sequentially preferable site. Accordingly, we consider that the following text at paragraph 8.10 should be deleted:  "for these reasons retail, leisure and cultural development or extensions of up to 400 sqm will not be required to comply with the sequential approach set out in this policy."				change to text at 8.10 to change 400sqm to 100sqm.
19	125	NLP on behalf of Capital Shopping Centres	8.11	No	In relation to impact assessments, CSC consider the nationally set impact assessment threshold contained within paragraph 8.11 is not justified as it is not the most appropriate strategy for the borough when considered against reasonable alternatives (a locally set threshold).  The Council should use the Development Management Policies DPD as an opportunity to set	In order to safeguard investment in designated centres we believe a locally set threshold for impact assessments in	Not Specified	None Given	None Suggested	No local evidence to justify this and none submitted to justify a reduction No change

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					an appropriate locally set threshold for impact assessments rather than relying upon the default national threshold which we do not consider to be appropriate to adequately protect designated centres within and adjacent to the Borough. CSC considers, given the planned investment within the designated centres both within the Borough and nearby, that out of centre proposals below the 2,500sqm threshold could still significantly harm the vitality and viability of designated centres by delaying or jeopardizing investment	the Borough should be 1,000sqm gross.				

**Policy 47: Primary Shopping Frontages**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	110	Greater London Authority	Policies 46-52	Yes	Supported, no specific comments.	None	Yes	None Given	None Suggested	Support Noted

**Policy 48: Secondary and Designated Shopping Frontages**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
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ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	25	Hatch End Association	Policy 48		An argument for an increase in the permitted non-retail frontage from present levels to 50% has not been made or justified.	None suggested	Not Specified	None Given	None Suggested	This percentage has been used for its consistency with secondary frontage as used in the UDP, as these frontages typically have a similar type of retailing / other uses in them, and to help the vitality of these centres so they can respond to changing retail demands. It is shown through shop frontage surveys that Local centres have a broader role and so require a wider range of uses, as reflected in their existing make up, and so a 50% limit is appropriate.
17	110	Greater London Authority	Policies 46-52	Yes	Supported, no specific comments.	None	Yes	None Given	None Suggested	Support Noted

**Policy 49: Other Town Centre Frontages and Neighbourhood Parades**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	110	Greater London Authority	Policies 46-52	Yes	Supported, no specific comments.	None	Yes	None Given	None Suggested	Support Noted
18	121	CGMS on behalf of the Metropolitan Police	Policy 49	Yes	The MOPAC/MPS support the inclusion of community uses as acceptable uses within non-designated town centres and neighbourhood parades. This will ensure the future delivery of police facilities that enable better public access and it is recommended that this policy be retained.	None	Not Specified	None Given		Support Noted

#### Policy 50: Vacant Shops in Town Centres and Neighbourhood Parades

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
2	012	Harrow Agenda 21	Policy 50	Not Stated	The increased number of supermarket selling space will have a detrimental effect on small shops. There will therefore be a surplus and many shops will be empty. Therefore, there should be reconfiguration and some shops should be replaced by flats/parking spaces for the use of shoppers visiting the other shops which are surviving. This would relieve pressure on shoppers and retailers who are losing custom because of no or limited parking nearby.			None given	None Suggested	This is not in conformity with the NPPFs town centre first policy
2	013	Harrow Agenda	8.35	Not Stat	Shops turning into residential units is happening. E.g West Harrow, Har5ro on the Hill and Roxborough			None	None	Harrow's Core Strategy has

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		21		ed	Road.			given	Suggested	identified neighborhood parades and the policies in this DPD seek to prevent this.
17	110	Greater London Authority	Policies 46-52	Yes	Supported, no specific comments.	None	Yes	None Given	None Suggested	Support Noted

**Policy 51 Mixed-Use Development in Town Centres**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	110	Greater London Authority	Policies 46-52	Yes	Supported, no specific comments.	None	Yes	None Given	None Suggested	Support Noted

**Policy 52: Evening Economy**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
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ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
2	014	Harrow Agenda 21	Policy 52 para 8.45	Not Stated	Any chance of the often mentioned multi- purpose hall? Wealdsone or harrow- either will do. The loss of car parks especially the one at Rayners lane will be a great loss to the Community: the planned loss of North Harrow Methodist Church, likewise. Harrow with other London Boroughs must tell the London Assembly that they are ruining the suburbs and making them unpleasant to live in. As people move out it will put pressure on the countryside. The population strategies need looking at and development needs to be away from the SE which is facing many problems including water shortage.			None given	None Suggested	Sites are allocated in the Site Allocations DPD or the Area Action plan DPD.  This is beyond the scope of this DPD.
17	110	Greater London Authority	Policies 46-52	Yes	Supported, no specific comments.	None	Yes	None Given	None Suggested	Support Noted

### Chapter 9: Transport and Waste

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	26	Hatch End Association	Chapter 9		Is it too late to include, somewhere in this chapter, a welcome to any proposals which introduced lifts in all stations in the borough which would help the disabled, elderly, or pram-pushing passengers to cross between platforms?	Add support for disabled access at stations	Not Specified	None Given	None	This is expressed in the Core Strategy at CS1 A.b

**Policy 53: Parking Standards**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
4	36	Campaign for a Better Harrow Environment	Policy 53		As in the AAP, we feel that in Policy 53 Parking Standards 53 D the emphasis on car clubs needs to be stronger: Encouraging rather than supporting car clubs. The reasoned justification assumes that high levels of car ownership will continue. We question whether this is realistic in an area where intensification of development will increase demand for road space for both parking and driving even beyond the present levels, which are approaching saturation at times in many parts of central Harrow. We feel that modal shift away from single occupancy car use by able-bodied drivers should be a high priority for central Harrow, and for London as a whole	The emphasis on car clubs needs to be stronger: Encouraging rather than supporting car clubs.	Not Specified	None Given	None Suggested	Agreed – wording change from 'supporting' to be replaced with 'encouraging' to reflect the Council's position on sustainable transport.
16	93	Drivers Jonas Deloitte on behalf of RNOH	Policy 53	Yes	The exceptional operational circumstances of the RNOH are considered to be sound justification for exceeding the London Plan parking standard on this site. The Trust therefore supports the flexibility of this policy in that proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements and any special safety considerations.	None	Not Specified	None Given	None Suggested	Support Noted
17	111	Greater London Authority	Policy 53 Parking standards	Yes	This policy is supported. Specific reference to London Plan maximum car parking standards, electric vehicle charging points and car clubs is welcomed.	None	Yes	None Given	None Suggested	Support Noted

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
18	122	CGMS on behalf of the Metropolitan Police	Policy 53	Yes	The MOPAC/MPS support part A.a. of Policy 53 which requires vehicle parking provision to have regard to the maximum standards set out in the London Plan.	None	Not Specified	None Given	None Suggested	Support Noted

#### Policy 54: Transport Assessments and Travel Plans

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
4	37	Campaign for a Better Harrow Environment	Policy 54		Transport Assessments (Policy 54) need to be realistic, not merely a 'stitch-up' between developers and council officers, as happened at Neptune Point. There needs to be provision for independent assessment of TA's by impartial third party experts to ensure that the assessments are realistic and robust.	There needs to be provision for independent assessment of TA's by impartial third party experts	Not Specified	None Given	None Suggested	Transport assessments are published as part of any planning application so they can be scrutinized. They are also compelled to comply with TfL guidance.

#### Policy 55: Servicing

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	112	Greater London	Policy 54	Yes	The reference to strategic principles and TfL guidance within London Plan Policy 6.3 is supported.	The Council is invited to	Yes	None	None	Agreed – amend text at 9.16 to refer



ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
		Authority	Transport assessments and travel plans		However, the Council is invited to specifically reference the importance of submitting construction logistics plans and delivery and servicing plans within the supporting text to this policy.	specifically reference the importance of submitting construction logistics plans and delivery and servicing plans within the supporting text to this policy.		Given	Suggested	to submitting construction logistic plans and delivery and servicing plans.
17	113	Greater London Authority	Policy 55 Servicing	Yes	It is noted that this policy does not address freight transport. In line with London Plan Policy 6.14, officers would welcome a policy/part policy which would promote sustainable freight transport, and encourage uptake of the Freight Operators Recognition Scheme. New development should minimise the impact of freight through the submission of construction logistics plans and delivery & servicing plans (refer to representation 19 in this appendix). Where appropriate, the transfer of freight by rail and water should be strongly encouraged.	In line with London Plan Policy 6.14, officers would welcome a policy/part policy which would promote sustainable freight transport, and encourage uptake of the Freight Operators Recognition Scheme.	Yes	None Given	None Suggested	Freight infrastructure is not a significant strategic issue in Harrow, and therefore the Council feels that London Plan policy 6.14 B will be adequate to determine any such application.

**Policy 56: Waste Management**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
17	117	Greater London Authority	Policy 56 Waste management	Yes	Part A of this policy states that: " <i>All proposals will be required to make on-site provision for the reduction of general waste...</i> ". Whilst the intention that general waste should be reduced is strongly supported, officers are unclear how this policy will manifest itself in practice. To avoid instances where less physical space would be provided for general waste it is suggested that "the reduction of" be deleted from this policy.	To avoid instances where less physical space would be provided for general waste it is suggested that "the reduction of" be deleted from this policy.	Yes	None Given	None Suggested	Agreed – amend by removing the words 'the reduction of' to avoid the stated problem.
17	118	Greater London Authority	Policy 56 Waste management	Yes	With respect to Part B of this policy, it is recommended that site waste management plans require proposals to achieve outcomes set out in London Plan policies 5.16B a-f and 5.18C.	It is recommended that site waste management plans require proposals to achieve outcomes set out in London Plan policies 5.16B a-f and 5.18C.	Yes	None Given	None Suggested	The London Plan policy is a strategic one, and this policy will contribute to achieving it's aims. This will be added to the text at 9.29 for clarity, stating 'this policy seeks to achieve the outcomes set out in London Plan policies 5.16B and 5.18C.

## Chapter 10: Community Infrastructure

No comments received

### Policy 57: New Community, Sport and Education Facilities

No comments received

**Policy 58: Retention of Existing Community, Sport and Education Facilities**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
18	123	CGMS on behalf of the Metropolitan Police	Policy 58	Yes	Policy 58 seeks to protect existing community uses unless there is no longer a need for that facility, there are similar facilities near by or the redevelopment of the site would secure an over-riding public benefit. The MOPAC/MPS support this policy.	None	Not Specified	None Given	None Suggested	Support Noted

**Policy 59: Enhancing Outdoor Sports Facilities**

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	27	Hatch End Association	Policy 59		Flood-lighting for sports facilities. For "will be supported...[where it would not be, etc]" substitute "will be approved...".	Suggested grammatical changes	Not Specified	None Given	None	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.

**Chapter 11: Telecommunications**

No comments received

## Policy 60: Telecommunications

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
3	28	Hatch End Association	Policy 60		Telecommunications....the same comment as for Policy 59. Paragraph 11.7 argues against proliferation of new communications equipment, so that "approved" is arguably better than "supported".	Suggested grammatical changes	Not Specified	None Given	None Suggested	Throughout the document the terms resist / refuse and support / approve have been used interchangeably. It is not considered that these terms will leave decision makers in any doubt as to how the policy should be applied. No change.

## Chapter 12: Implementation, Resources and Monitoring

No comments received

## Policy 61: Planning Obligations

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
16	94	Drivers Jonas Deloitte on behalf of RNOH	Policy 61		The Trust acknowledges that financial contributions will be sought in the form of Planning Obligations for new development proposals. However, in light of the recently adopted Mayoral Community Infrastructure Levy (CIL) and the emerging LB Harrow CIL, the	None	Not Specified	None Given	None Suggested	The Council remains flexible in its consideration of viability matters when negotiating

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					Trust encourages the Council to consider development proposals within the current economic climate and recognise the financial constraints within which a number of landowners and developers are currently operating within.				d	appropriate obligations on development.

### Glossary

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
18	124	CGMS on behalf of the Metropolitan Police	Glossary		As set out in our previous representations, it is necessary to ensure the emerging Development Management Policies DPD is consistent with national, strategic and local planning policies with regard to the definition of community facilities. It is therefore recommended that the glossary definition of community facilities is amended to reflect the definition provided within paragraph 10.3 of Policy 57 of the draft Development Management DPD. The definition should be revised as follows (additional wording underlined):  <b><i>Community Facilities: Community facilities include <u>educational facilities, youth centres, advice centres, and community halls places of worship, church halls, public halls, day nurseries, consulting rooms, educational establishments, museums, indoor sport facilities and emergency services.</u></i></b>	Revise definition as follows:  <b><i>Community Facilities: Community facilities include <u>educational facilities, youth centres, advice centres, and community halls places of worship, church halls, public halls, public halls, day nurseries, consulting</u></i></b>	Not Specified	None Given	None Suggested	Amend glossary to be consistent with the definition used in the Core Strategy

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
						<u>rooms, educational establishments, museums, indoor sport facilities and emergency services.</u>				

#### Schedule 1; Town Centre Frontages

No comments received

#### Schedule 2: Method for Applying Changes of Use Shops Policy

No comments received

#### Schedule 3: Harrow Land Drainage Byelaws

No comments received

#### Schedule 4: Harrow Protected Views

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
4	38	Campaign for a Better Harrow Environment	Schedule 4		Schedule 4 lists the protected views of Harrow-on the Hill and the Weald Ridge proposed by SLR consultants in their assessment (December 2011). Changes have been made subsequently (July 2012). Some of these changes are apparently to aid interpretation, although more explanation is needed	Clarify if maximum height thresholds in feet or metres	Not Specified	None Given	None Suggested	Agreed – clarify that it is in meters

ID	Re p No	Organis ation Details	Para	Sou nd	Reason	Change	Leg al	Reas on	Cha nge	Council's Comments / Response
					<p>for lay people to be able to understand the significance (for example, are the values for maximum height thresholds in feet or metres?). Also the dimensions of the protected areas for several views have been altered. In 2 cases we feel that the changes substantially reduce protection of the view and undermine the assessment as part of the evidence base:</p> <p>c) <b><u>View 6: Harrow Recreation Ground</u></b>  The photograph was changed in response to a comment that now Neptune Point is complete, the yellow line indicating the height of the consultation viewing zone is too low. In the new photomontage, not only the yellow line but also the red line, indicating the threshold of the central viewing corridor has been raised. This is wholly unjustified as there are no tall buildings in the foreground or middle ground in this zone and if a development were to be permitted very little of the top of the hill would still be visible, disconnected from its base. Extending the threshold of this zone would also mean that no part of the Hill or St Mary's church would be visible from the lower levels of the recreation ground. We therefore suggest that, in order to be effective in protecting this view, the red line should be made considerably lower than the yellow line, thus ensuring that some view of the Hill remains, albeit shuttered by recent developments.</p> <p>d) <b><u>View 11: Wood Farm</u></b>  Both the plan diagram and the photograph have been changed to reduce the red viewing corridor to a quarter or less of its original width. This now means that only the top of the Hill is within this zone whereas previously the whole Hill was included. This</p>	<p>We therefore suggest that, in order to be effective in protecting this view, the red line should be made considerably lower than the yellow line, thus ensuring that some view of the Hill remains</p>				<p>Changes to the landmark viewing corridor and wider setting consultation area were included in the views assessment upon the recommendation of the consultant taking into account the impact that Neptune Point and Bradstowe house already have upon this view.</p> <p>No change.  The viewcone was reduced in size due to the consultants opinion that the viewcone published</p>

ID	Rep No	Organisation Details	Para	Sound	Reason	Change	Legal	Reason	Change	Council's Comments / Response
					<p>change was not prompted by comments via public consultation and, unlike view 2, does not apparently correct a mismatch between the diagram and photomontage. It does, however, substantially compromise protection of this view: several significant sites allocated for development in the Intensification Area, including Lyon House and Gayton Road, now lie in the less protected yellow consultation area rather than the better protected red viewing corridor.</p> <p>2. There appears to be confusion between Harrow View and Harrow Recreation Ground in the descriptions of the view: The same narrative is used in sections 4.1 and 4.6, though the view is different. Visual Management Guidance for both views states that "No new structures should be permitted which would breach the current skyline formed by St. Mary's and Harrow on the Hill." Whilst we welcome this, sadly it is a classic case of stable door closing, as the visual intrusion to the skyline caused by Bradstowe House and more particularly Neptune Point have already seriously damaged the view from Harrow Recreation Ground.</p>					<p>for consultation was set to wide.</p> <p>This is an error, the correct text will be inserted from the Views Assessment document.</p>

### Schedule 5: Archaeology

No comments received

### Appendix A: Harrow Unitary Development Plan (2004): Deleted Policies and Schedules



No comments received

**Appendix B: Implementation and Monitoring**

No comments received

## NOTE ON SUPPLY OF RETAIL FLOORSPACE AS AT OCT 2012

### Planning for New Retail Floorspace – Policy Requirements

Paragraph 23 of the NPPF states that local planning authorities should:

- allocate a range of suitable sites to meet the scale and type of retail...development needed in town centres...;
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If suitable edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre; [and]
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.

London Plan Policy 4.7 *Retail and Town Centre Development* states that boroughs should:

- identify future levels of retail and other commercial floorspace need in light of integrated strategic and local assessments
- take a proactive partnership approach to identify capacity and bring forward development within or, where appropriate, on the edge of town centres
- firmly resist inappropriate out of centre development
- manage existing out of centre retail and leisure development in line with the sequential approach, seeking to reduce car dependency, improve public transport, cycling and walking access and promote more sustainable forms of development

Policy CS1L of Harrow's Core Strategy supports proposals for convenience and non-major comparison retail within the Borough's district and local centres. Proposals for major comparison retail development are directed to Harrow town centre's primary shopping area. Paragraph 4.23 of the reasoned justification to the policy identifies the evidenced retail floorspace projections (see below) and goes on to caution: '...that long-term projections are subject to change and should therefore only be used as a broad guide'.

### Planning for New Retail Floorspace – Evidence

The Harrow Retail Study (2009) projects a need for 38,912m<sup>2</sup> comparison retail floorspace and 5,261m<sup>2</sup> convenience floorspace over the period 2009 to 2025. The projection takes into account forecast expenditure growth within the catchment area of the study, the role of other forms of trading (such as internet shopping), the potential for increased sales density/reduced vacancy levels from existing retail floorspace, and the pipeline supply of new retail floorspace at the time of the study. The projection assumes that the Borough will maintain its market share of expenditure.

The Study disaggregates the floorspace projections into five yearly periods as follows:

	2009-2015	2015-2020	2020-2025	<b>2009-2025</b>
Comparison	11,869m <sup>2</sup>	12,848m <sup>2</sup>	14,194m <sup>2</sup>	<b>38,912m<sup>2</sup></b>
Convenience	3,366m <sup>2</sup>	1,017m <sup>2</sup>	882m <sup>2</sup>	<b>5,261m<sup>2</sup></b>

The Study urges caution in the use and interpretation of the projections. In particular, paragraph 17.2 states that:

- 'The long term floorspace projections (up to 2020 and beyond) shown in Section 16.0 should be treated with caution and should only be used as a broad guide, particularly when translated into the development plan allocations or when used to guide development control decisions. Long term forecasts may be subject to change due to unforeseen circumstances. Projected surplus expenditure is primarily attributable to projected growth in spending per capita. If the growth in expenditure is lower than that forecast then the scope for additional space will reduce. Long term projections should be monitored and kept under-review. Recommendations on monitoring and updating projections are set out in Section 18.0'.

The need for caution in the use of the projections is repeated at paragraph 18.3, 18.5 and 18.35. At paragraph 18.36 it is recommended that the Retail Study be updated in 4-5 years' time (i.e. 2013-2014).

### Planning for New Retail Floorspace – Capacity of Consented Schemes and Site Allocations

The following table represents the 'pipeline' supply of new retail floorspace based on approvals following the completion of the Retail Study in 2009. It should be noted that the Neptune Point Morrisons store was included as a

commitment in the formulation of the Retail Study projections, but that Bradstowe House was excluded (as a stalled development site).

The small units at Kodak and the Bradstowe House floorspace are attributed to comparison retailing as they are consented for A1-A5 uses.

<b>Consented Schemes (post Retail Study)</b>		
<b>Site</b>	<b>Comparison (m<sup>2</sup>)</b>	<b>Convenience (m<sup>2</sup>)</b>
Kodak site supermarket	560	3,440
Kodak site small units (A1-A5)	1,000	-
Tesco supermarket extension	2,368	651
Tesco small units (A1-A3)	437	-
Bradstowe House retail	1,617	-
Equitable House/Lyon House retail	500 <sup>1</sup>	-
<b>Totals:</b>	<b>6,482m<sup>2</sup></b>	<b>4,091m<sup>2</sup></b>

The following table shows the potential retail floorspace of sites allocated in the Harrow & Wealdstone AAP. The floorspace of all sites is attributed to comparison retailing as they are allocated for A1-A5 uses.

<b>AAP Allocations</b>		
<b>Site</b>	<b>Comparison (m<sup>2</sup>)</b>	<b>Convenience (m<sup>2</sup>)</b>
Wealdstone infills (site 5)	1,000	-
Civic Centre small units (site 9)	1,000	-
Greenhill Way car park (site 13)	5,000	-
College Road west (site 16)	3,000	-
Havelock Place (site 17)	5,000	-
51 College Road (site 18)	5,000	-
<b>Total:</b>	<b>20,000m<sup>2</sup></b>	-

The following table shows the potential retail floorspace of sites allocated in the Site Allocations DPD. For the purposes of this note and consistent with the Core Strategy, the floorspace of all sites with a capacity of 1,000m<sup>2</sup> or less is attributed to comparison retailing, and those over 1,000m<sup>2</sup> is attributed to convenience retailing. However, it should be noted that the sites with a capacity of 1,000m<sup>2</sup> or less may also be suitable for convenience retailing development.

<b>Site Allocations DPD</b>		
<b>Site</b>	<b>Comparison (m<sup>2</sup>)</b>	<b>Convenience (m<sup>2</sup>)</b>
Land between High Street and Love Lane (site R1)	1,000	-
Units south of Rayners Lane Station (site R2)	500	-
Harrow West conservative Association (site R3)	1,000	-
Roxeth Library and Clinic (site R5)	1,000	-
Land at junction Kenton Road	1,000	-

<sup>1</sup> The approved scheme allows for 1,548m<sup>2</sup> A1-A3 and D1 uses. Therefore a notional figure of 500m<sup>2</sup> has been attributed to retail assuming that the remainder comes forward as D1 use.

/Honeypot Lane (site R6)		
Anmer Lodge and Stanmore Car Park (site R7)	-	2,000
North Harrow Methodist Church (site G07)	-	2,000
<b>Totals:</b>	<b>4,500m<sup>2</sup></b>	<b>4,000m<sup>2</sup></b>

The following table summarises the sum of pipeline and proposed allocated supply of comparison and convenience retail floorspace.

Source	Totals	
	Comparison (m <sup>2</sup> )	Convenience (m <sup>2</sup> )
Consented Schemes	6,482	4,091
Allocations	24,500	4,000
<b>Totals:</b>	<b>30,982m<sup>2</sup></b>	<b>8,091m<sup>2</sup></b>

### Commentary

For the short/medium term period (2009-2020) the Retail Study floorspace projections amount to 24,717m<sup>2</sup> comparison retail floorspace and 4,383m<sup>2</sup> convenience retail floorspace. It can be seen from the tables above the consented schemes and allocations meet and exceed the projected need for comparison floorspace in the short-medium term, and that the projected need for convenience floorspace is almost entirely met by schemes that are already consented. There are sufficient consented and allocated sites to meet and exceed the convenience floorspace projections for the entire period 2009-2025.

In view of the inherent uncertainty associated with the long term (2020-2025) projections, clearly highlighted in the Retail Study and reflected in the reasoned justification to Core Strategy Policy CS1, it is considered that short/medium term projections provide a reasonable planning basis for allocating sites in the Area Action Plan<sup>2</sup> and Site Allocations DPD. In line with the Study's recommendation, the floorspace projections will be reviewed in forthcoming years.

The implication of paragraph 23 of the NPPF is that out-of-centre sites should not be allocated, but that local planning authorities should set policies for meeting identified needs/considering proposals that cannot be accommodated on in-centre or edge of centre sites. Policy 46 of the Development Management Policies DPD sets out criteria for the consideration of new retail development in out of centre locations and therefore allows for any retail development associated with the higher (long range) comparison floorspace projections – in the event that they are sustained following a review of the Retail Study - to come forward during the plan period.

<sup>2</sup> Which includes all of the consented developments.