

**Harrow and Wealdstone Area Action Plan  
Regulation 22(1)(c) (v – vi) & (d) Consultation Statement**

**September 2012**

**LDF**

Local Development Framework

## 1. Introduction

1.1 Consultation on the Harrow and Wealdstone Area Action Plan 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 required the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken on the Area Action Plan at the Pre-Submission stage, a summary of the main issues raised to consultation, and to detail the Council's response to comments made.

## 2. Summary of consultation undertaken on the Area Action Plan Pre-Submission consultation document

- 2.1 On 20<sup>th</sup> June 2012, Harrow's Cabinet considered a report on the Harrow and Wealdstone Area Action Plan (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 AAP be referred to Full Council for approval for consultation.
- 2.2 On 5 July 2012, Full Council endorsed the Area Action Plan 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 In addition to the above Council sign-off, the Deputy Major for London also formally signed off on the AAP Pre-Submission document for public consultation on behalf of the Greater London Authority.
- 2.4 Formal notification of the AAP 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.
- 2.5 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**) on 27<sup>th</sup> July 2011. Enclosed with the letter was a hard copy of the AAP 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 AAP with the London Plan 2011 (see **Appendix G**).
- 2.6 Hard copies of the AAP 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 libraries across the Borough. Additional copies of the AAP 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.
- 2.7 A week prior to the close of consultation a reminder email and letter were sent out to those on the LDF consultation database to remind people of the closing date for making their comments.

## 3. 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, in particular, that each person, including a local planning authority, to:

- (a) to engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and
- (b) to have regard to activities of a person within subsection (9) so far as they are relevant to activities within subsection (3).

3.4 The duty under section 33A(2) Planning and Compulsory Purchase Act 2004 applies to the preparation of development plan 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 AAP, following the approach set out in the NPPF. The mechanisms for and evidence of cooperation and engagement is set out in the below.

Public Body	Council's Engagement and Cooperation
Local Planning Authorities and County Councils	<p>The production of Local Plan documents is a standing item on the West London Alliance (WLA) Planning Policy Officers meeting agenda. The WLA includes representatives from Harrow, Hillingdon, Ealing, Brent, Hammersmith &amp; Fulham, and Hounslow councils. The Planning Officers Group has an agreed TOR based around the sharing of information and experience, the early identification of potential sub-regional or cross-boundary issues, and the exploring of opportunities for joint working. The TOR also includes a process for any conflict resolution. Although Barnet are not part of the WLA, they attend these meetings given their relationship with Harrow and Brent. With regard to production of the AAP, this sub-regional forum plays three significant roles. The first is in ensuring each borough is taking responsibility to manage its growth apportionments as set out in the London Plan. Hence why at each quarterly meeting each borough provides an update as to where they are at with developing their respective plans. Secondly, it is used to understand Harrow's growth area proposal in the context of neighbouring and wider sub-regional growth area proposals. This is to ensure boroughs are not proposing strategies that would necessarily see them competing against each other for the same market resource, as well as to look for potential synergies to be exploited. Lastly, it is to look at cross boundary and sub-regional initiatives, including strategic infrastructure provision, particularly transport, healthcare and education. With regard to the latter, flooding is an issued shared between Brent and Harrow. Early discussions between the parties heavily influenced that Council decision to change its consultant's for the SFRA addendum to ensure a consistency in approach was taken to the whole catchment. This is likely to lead to further joint working, where the only practical solution to Brent's flood risk management is to undertake mitigation works in Harrow. The AAP in particular makes provision for this in the project to deculvert Kenton Recreation Ground and create additional storage capacity. The last meeting of the WLA Policy Officers Group was held on 4 October. It should be noted that the new Duty to Cooperate is now a standing item on the agenda. Harrow officers again gave an update on the AAP, post close of consultation, and again no concerns were raised by members to Harrow's AAP.</p> <p>In addition to briefing updates via WLA, both Harrow and Hillingdon councils regularly attend a meeting of the Hertfordshire and Buckinghamshire councils (Three Rivers, St Albans, Dacorum, Watford, Hertsmere, Chiltern and South Bucks) to discuss cross-boundary matters, potential for joint working and to update each other on local plan development and recent experiences. Our last meeting was held on 16 July 2012, where each borough gave an update on CIL and local plan preparation, and a discussion was held into housing delivery and how as neighbouring authorities we respond to requirements under the Duty to Cooperate. At that meeting no concerns were raised regarding Harrow's AAP.</p> <p>At the inception of the AAP, there was also being developed an initiative for a London – Luton Corridor. A forum of borough members was established, with Harrow being one, as the proposal sought to capture the Harrow and Wealdstone Intensification Area. While several meetings to progress proposals for the growth corridor were held, there is unfortunately little appetite between the parties to rapidly progress this work. However, initial consultation highlighted potential for a joined up approach to managing and attracting growth in this area, and helpfully for Harrow, this work did not identify any major cross boundary issues arising between the AAP and the proposal for the growth corridor. The Council will continue to engage in this proposal should this work be revitalised.</p>
The Environmental Agency	<p>At each stage of the Plan's preparation, all neighbouring local authorities were formally sent notification, however only Hertsmere and Three Rivers borough councils took the time to respond and then only to confirm that they have no comment to make. The Council will continue to update its neighbouring authorities on progress with its AAP and other local plan documents through the sub-regional forum meetings and will continue to formally engage them on any potential issues arising out of implementation.</p> <p>The EA have been actively involved in the SFRA underpinning the Core Strategy, the AAP and the other DPDs. The Council has sought the EA's advice on the scope of each SRFA tender brief and took on board the EA's feedback to these. Throughout the preparation of each SFRA, the Council met frequently with the EA to discuss and seek resolution to any potential issues of contention. Drafts of the level 1, 2 and level 2 addendum were also circulated to the EA for review, and any EA comments forwarded to the consultants to address prior to each being finalised and published for wider consideration alongside the emerging local plans. With regard to the AAP, the EA flagged up early its concerns with flood risk within Wealdstone town centre and the potential of conflict with Council's proposals for regeneration of the area. As a result of these concerns, the Council and the EA agreed to undertake the Level 2 SFRA addendum. Over its production, several meetings were held with the EA to discuss and agree a way forward that would justify, in principle, the of removal of the 3b flood zone from applying to the built up urban environment. The EA also offered advice, which the Council welcomed, on the detailed wording and scope of Policy AAP9: Flood Risk and Sustainable Drainage. The Council considers that the comments made by the EA, to the formal consultation on the AAP Pre-Submission document, speak volumes as to the close</p>

collaborative working between the two organisations, which the Council anticipates will continue into the implementation phase of the AAP, especially in respect of the consideration of proposals for individual sites but also in respect of strategic flood mitigation works, such as those proposed for Kenton Recreation Ground.

The Historic Buildings & Monuments Commission

English Heritage (EH) has and continues to be engaged in the preparation of Harrow's various local planning policy documents. As part of the formal submission and examination of the Harrow Core Strategy, discussions were held between the Council and EH regarding views protection and the establishment of a policy framework for the management of tall buildings and their potential impact on heritage assets. This helped to resolve many of contention prior to the Examination in Public on the Core Strategy. With respect to the issues of views, it was agreed that the Council should undertake a new views assessment to underpin the local views to be taken forward in the Local Plan. This work was done in 2011/12. With regard to tall buildings, it was agreed at the EiP on the Core Strategy that this would be best addressed through the AAP. EH were consulted on the draft 'Development Heights' policy and made formal representations to this which were taken into account by the Council in drafting the AAP Pre-Submission document. EH has made further representations to which the Council has again responded to. These mostly concern, seeking amendments to the wording of the policy to better mirror that in the NPPF, which the Council has accepted and proposed as minor modifications. In respect of the other comments made, these relate to improving the setting of heritage assets within the AAP area. However, the Council notes that while other parts of the borough exhibit a stronger heritage character, this is absent within the AAP area, and therefore there is limited potential for a heritage character to influence new build design considerations within the Heart of Harrow. Other opportunities are also limited in respect of better revealing heritage assets through redevelopment of sites, as there are very few listed buildings, with potential for only one site to achieve this outcome – the Kodak development and Headstone Manor – and this has already been granted outline planning permission. Nevertheless, the Council is committed to working with EN where this facilitates the conservation of heritage assets and their setting, acknowledging however that such opportunities are more likely to be present outside of the AAP area.

Natural England

Natural England (NE) has and continues to be engaged in the preparation of Harrow's various local planning policy documents. As part of the formal submission and examination of the Harrow Core Strategy, face-to-face discussions were held with officers from NE. While that meeting helped to resolve many of the outstanding issues between the parties in respect of Harrow's Core Strategy policies, it also heavily influenced the Council to introduce a new policy AAP12 into the AAP on Improving Access to Nature. The Council has continued to formally notify NE of publication of the AAP, and their comments have been taken into account. As a result, NE's response to the Pre-Submission AAP consultation was simply to note that they were satisfied with the document and had no substantive comments to make.

Mayor of London

The GLA have been involved in the preparation of the AAP since the project's inception. In recognition of the fact that the AAP seeks to give effect to the London Plan Harrow & Wealdstone Intensification Area designation both authorities determined that the document should be produced jointly with the Council taking the lead. At the inception stage, a Leadership Group and an Officer Steering Group were established. The Leadership Group comprised Divisional Directors and Team Leaders from the Council, the HCA, Design for London, Transport for London, GLA Plans Unit and Forum Chairs, and had responsibility for overseeing the project, getting any necessary political buy-in and ensuring the project was resourced and kept to programme. The Officer Steering Group shared the same membership but at officer level and were responsible for day-to-day management of the project. To facilitate joint working, the GLA agreed a planning officer secondment to the Council on a one day a week basis that has now been on-going for over two years and looks likely to continue. Design for London and the Council also jointly contracted an urban designer to advise on design matters for the AAP and to assist in the critique of the Consultants initial work. The Leadership signed-off on each stage of the Plan's preparation, prior to formal approval being sought. In addition to Council sign-off, sign-off was also sought from the Deputy Mayor prior to publication of each version of the Plan for public consultation. From a Council perspective, this collaborative working has helped to ensure potential issues are addressed immediately at the appropriate level, and has resulted in a comprehensive Plan that both authorities can fully support. It is envisaged that these working relationships will continue into the adoption and implementation stages of the AAP and, in particular, the long-term project management of the proposals set out.

Civil Aviation Authority

Other than formal notifications, the Council has had little engagement with the CAA over the development of its Local Planning Policies. The CAA was formally notified of publication of Harrow's AAP but has not made a representation at any of the consultation stages to date. The Council notes the CCA Guidance on Planning Consultation Requirements (CAA, 2 August 2012), which states at section 9, that "other than any consultation required by Section 110 of the Localism Act 2011, it is not necessary to consult the CAA about strategic planning documents". No proposals in the AAP fall within any of the categories listed as those which the CAA would wish to be notified. While the Council will continue to notify the CAA, in accordance with its Duty to Cooperate, there are currently no grounds identified that warrant more active engagement between the parties.

Homes and Communities Agency

The HCA were actively involved in the early preparation of the AAP. They were represented on both the Leadership Group and Officer Steering Group for the AAP, and helped that Council to draft the tender brief for its Viability Study for the Core Strategy and subsequent documents, such as the AAP. The HAC and the Council were also working closely together at the time preparing Harrow's Borough Investment Plan, until this initiative was scrapped. In addition to attendance at meetings on the AAP, the HCA also attended and presented to Harrow's Affordable Housing Delivery Group meetings, at which the preparation of the local plan documents is also a standing item. However, in the subsequent phases of the AAP's preparation, the functions of the HCA in London were handed to the Mayor, and therefore, the GLA have subsequently taken on board this role. Harrow's engagement with the Mayor of London is addressed above.

PCT

Harrow PCT is a Member of the Harrow Local Strategic Partnership, alongside the Council and other key agencies. At the Strategic level, the Council and the PCT work together to help promote good health amongst residents and to support vulnerable people who are eligible for social care, however, recent changes will see the responsibility for this aspect of the PCT's work fall solely to the Council. With regard to local planning, Council's planning policy officers have meet with the PCT on many occasions over the years to understand key health issues facing the borough, the need/demand/levels and specific requirements for new healthcare provision to serve existing and new communities and Harrow's changing demographics, as well as the PCT's proposed capital and estates strategies for the Borough. Unfortunately, the reforms to the NHS have impacted upon this relationship over the past year with the commissioning of local healthcare services now being devolved to local GPs. While the Council has actively sought to engage GPs, this continues to be on a one to one basis rather than with a GP consortium, and therefore has not been overly effective as yet in informing any review or update of the IDP. While the Council will continue to notify and consult the Harrow PCT and all known local GPs and health providers on such matters as local planning and publication of the Harrow AAP, it is likely to take time for these radical reforms to bed in and for more effective engagement to be achieved. No representations were received by bodies representing the health sector to the AAP at any of the formal notification stages. Of note, more recently the Council has sought to engage the PCT regarding development at two key sites within the Heart of Harrow where the Council has, through s106, negotiated provision for new health facilities to serve both the new and existing communities within the area. On both occasions the PCT has resisted being actively involved in the procurement of operators for these future premises and has effectively left this to the Council, the developer and local GPs to resolve – a dissatisfying outcome as far as the Council is concerned.

Office of Rail Regulation	The Council has sought on many occasions to engage Network Rail in discussions on its evidence base requirements, regarding rail capacity at Harrow-on-the-Hill and Wealdstone stations (Harrow Transport Audit) and station enhancements (Harrow Infrastructure Delivery Plan), and the emerging local plan proposals, but with no success. The Council has even approached TfL to try and broker discussions on its behalf but with the same result. Network Rail has been formally notified of publication of Harrow's AAP at all stages of consultation but has not made a representation. The Council will continue to seek the engagement of Network Rail in its consideration of the Council's proposals for station improvements.
Transport for London	TfL were represented on both the Leadership Group and the Officer Steering Group and have therefore been involved in the AAP since its inception. Initially, TfL worked closely with Baxters, who were the transport consultants commissioned as part of the consultant team, critiquing their methodology, assumptions and findings. However, in the latter stages of the AAP's preparation, TfL were responsible for commissioning consultants to undertake the AAP traffic impact assessment. They managed the consultant's use of the TfL model to run baseline and growth projections for all of the proposed development sites within the AAP, and lead on the consideration of potential mitigation measures modeling. Ultimately, TfL had responsibility for signing-off on the AAP traffic impact assessment. As with the rest of the GLA family, it is anticipated that the Council's close working relationship with TfL will continue into the implementation phase. Already TfL are working with the Council on the delivery of urban realm improvements within Harrow town centre, and have committed to work with the Council to further investigate options around the redevelopment of the Bus Station and Harrow-on-the-Hill Station, and to assist in the implementation of initiatives set out in the Green Travel Plan. With respect to other AAP transport improvements, both authorities hope to see these taken forward in the next review of the Local Implementation Plan.
Highway Authority	Harrow Council and TfL are the Highways Authority within Harrow. See comments above re engagement of TfL
Marine Management Organisation	Other than formal notifications, the Council has had little engagement with the Marine Management Organisation over the development of its Local Planning Policies, including the AAP. No representations have been received from this body to date, which is understandable given the Borough's land-locked location, and therefore the Council considers there to be no grounds currently identified that would warrant more active engagement between the parties.

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

- 4.1 22 consultation responses were received to the AAP Pre-Submission consultation document. These came from various statutory authorities and delivery partners (8), developers and agents (7), residents and interest groups (3) and individuals (4). **Appendix I** provides a full list of the respondents. In total, 125 individual comments were made that were considered and responded to by the Council (see **Appendix J and K**).

#### 5. Summary of the main issues / comments raised to the AAP Pre-submission consultation and the Council's response to these

- 5.1 The following section of the report summarises the main issues raised through consultation on the AAP Pre-submission and outlines the Council's proposed response to these and whether or not the Council has proposed a minor modification to address the issue raised. The following section of the report does not include reference to policies and allocations where the comments were all in support; offered only minor change; or no comments were received.

##### Whole DPD

- 5.2 Only one respondent (Cllr O'Dell) objected to the AAP in its entirety, having previously disagreed with the Council's selection of its Preferred Option for the Heart of Harrow following Issues and Options consultation. In response the Council referred to the detailed analysis undertaken of all comments received to the Issues and Options consultation, and determined to proceed based on the option that received the greatest support from a wide sector of community interests and on the findings of evidence, including the Sustainability Appraisal. Natural England noted their general satisfaction with the overall document, whilst Hertsmere Borough Council and Three Rivers District Council responded that they had no comments to make in relation to the policies and proposals of the AAP – this accords with our agreed approach with neighbouring authorities to formally acknowledge their engagement, having regard to the Duty to Cooperate, even if an authority has no comment to make. Of note, the Mayor of London confirmed that the AAP was in general conformity with his London Plan.

##### General comments

- 5.3 A number of respondents submitted representations that did not reference or related to a specific section, policy or site within the AAP. In such instances, the Council has grouped and treated these as general comments. Of particular note were the comments of Campaign for a Better Harrow Environment that were concerned with how the Council would manage the impacts of construction when development takes place across the Heart of Harrow and, in particular, what measures the Council would put in place, such as information boards on sites, to keep people informed of progress and to apologise for any ongoing inconvenience made necessary by the regeneration of an area or areas. NB: CBRE on behalf of Dandara Ltd also made a similar comment regarding the need for the Council to take a leadership role but referenced this to the paragraph in Chapter 2 that highlights some of the challenges facing Harrow town centre. One further general comment sought to query whether the Council had quantified the financial benefits and costs of growth to the borough as a result of implementing the AAP, highlighting the absence of a business plan. In response to these concerns the Council has proposed to add a further introductory section to the AAP chapter on Delivery, Implementation and Monitoring, regarding Council's leadership role and the need for the Council to work closely with all interested parties to actively project manage the implementation and delivery of the AAP.

##### Policy AAP 1: Development within Harrow town centre

- 5.4 The comments received sought to highlight a lack of connection between specific issues dealt with under other policies within the AAP that the respondent considered should also be recognised in this policy. In its response, the Council noted that the first three policies were intended to deal with matters specific to sub areas but not sites or topics. Site specific matters are addressed in the site allocations, and matters relevant to the whole of the AAP area are adequately addressed in topic based policies in the AAP. The Council therefore concluded that there was no need to repeat or deal with such matters again in Policy AAP1.

#### Policy AAP 5: Density and use of development

5.5 Three comments were received to this policy, two in support and one by English Heritage which sought to amend this policy and Policy AAP6 to consider the potential for high density development and tall buildings to be designed so that they enhance the significance of heritage assets, or for buildings to be demolished so that the significance of a heritage asset could be better revealed. With the exception of Headstone Manor and development of the adjacent Zoom Leisure Site – which the Council considers to be appropriately addressed in the site specific guidance to Opportunity Site 1 & 2 – the Council did not consider that development within the Heart of Harrow would presents such potential opportunities that would warrant inclusion of such wording within the policies. Further, the Council considered, were such a potential to arise, this could be adequately addressed through the appropriate application of Policy AAP4: Achieving a High Standard of Development throughout the Heart of Harrow, Part A(b).

#### Policy AAP 6: Development height

5.6 This Policy drew the most representations, the majority by CBRE on behalf of Dandara Ltd, who sought to amend the policy to deal directly with the provision of a tall building on their site. CBRE also objected to the reference to tall buildings making provision for viewing galleries and platforms. In response, the Council reiterated that the topic based policies of the AAP, and the evidence underpinning them (e.g. the Heart of Harrow Urban Design Analysis and the borough-wide Views Assessment), apply to the whole of the Heart of Harrow and were not intended to address site specific matters. Site specific matters, including any relevant material considerations for allocated sites, are appropriately left to the Sub Area and Site Specific Guidance set out in Chapter 5. The Council was satisfied that there was no conflict between the requirements of the Harrow Core Strategy, Policy AAP6 and the site allocations of the AAP. With regard to viewing galleries and platforms, the Council agreed the terminology was not consistent with the London Plan and proposed changes to make it so. In response to comments received by the GLA, which were also made by English Heritage but to a reference to building heights made in Chapter 2, the Council proposed to include a definition of 'taller', 'tall' and 'tall landmark' building in the Glossary section. With regard to English Heritage's other comments, the Council agreed that the wording of parts of the Policy should be amended to better mirror that of the NPPF but disagreed with the suggestion that applicants for taller and tall buildings be required to undertake a heritage assessment in addition to an urban design analysis. Of the remaining comments, one was made in support of the changes Council made to the Policy following the Preferred Options consultation; one sought to address matters outside the scope of the AAP; and further one from the GLA which offered revised wording to overcoming any potential confusion regarding the use of the term 'podium', which the Council has proposed to accept.

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

5.7 Of the five representations received to this policy, only that made by Thames Water was not in support. Thames Water considered that the Policy did not adequately cover sewerage infrastructure and sought amendments to require developers to demonstrate adequate water supply and sewerage infrastructure capacity to serve the proposed development. In response, the Council clarified that such a requirement was already provided for within the Core Strategy (Core Policy CS1Z) and therefore it was not necessary to repeat this requirement again in the AAP. The Council also noted that, in response to Thames Water's comments to the AAP Preferred Option Consultation, the Council had included in the RJ to this Policy, reference to those sites where Thames Water had raised potential capacity concerns and the need for developers of these sites to prepare a drainage strategy in liaison with Thames Water.

#### Policy AAP13: Housing within the Heart of Harrow

5.8 Only one representation was received to the Policy - that of the GLA, who invited the Council to introduce further detail within the RJ to justify the different affordable housing tenure split to apply to the Wealdstone sub area. In response, the Council agreed and has proposed amendments that highlight the significant portion of affordable housing being built in this area over the past 10 years when compared to the rest of the borough that justify a tenure split in favour of intermediate provision to accord to the AAP objective to regenerate Wealdstone.

#### Policy AAP16: Supporting the Service Sector in Harrow Town Centre

5.9 Two of the three representations supported the policy, while the third by Campaign for a Better Harrow Environment queried whether the approach outlined in Policy aligned to the recommended approach outlined in the Employment Land Review study. In response, the Council set out the issues raised in the study and how Policy AAP16 sought to address these.

#### Policy AAP17: Primary Shopping Areas and the Primary Shopping Frontage

5.10 The representation by the GLA was in support, while the two comments made by RPS on behalf of Person Pension Property Fund sought to query whether the AAP identified sufficient sites to meet the retail needs for the area and queries whether the sites allocated would come forward over the short to medium term period of the Plan. In essence, the RPS representation sought to make the case for further retail development on their client's site, which is an out-of-centre site outside of the AAP area. In response the Council confirmed that, within both the Site Allocations DPD and the AAP, sufficient sites had been allocated to meet the Borough's short and medium term retail projections, and in accordance with recommendations of the Retail Study, the Council had taken a more precautionary approach with respect long-term projects, preferring to address these through Policy (as advocated by the NPPF). The Council also highlighted the schemes currently under construction and those with planning permission, which together demonstrate a strong pipeline of retail development.

#### Policy AAP19: Transport, Parking and Access within the Heart of Harrow

5.11 Both representations supported the Policy but that of Campaign for a Better Harrow Environment sought to strengthen the requirements for the establishment of car clubs, which they also considered should receive priority over other parking needs. The Council agreed and has proposed a minor modification to address these concerns.

#### Policy AAP20: Harrow & Wealdstone Green Travel Plan

5.12 While the representation of Campaign for a Better Harrow Environment agreed that the aims of the Policy were laudable, they wanted the Policy to include a requirement for effective monitoring and delivery of the travel plan, including follow up actions to be taken by the Council where Travel Plans are not implemented. In response the Council clarified that the requirements for monitoring and implementation of the Travel Plan were set out in detail in the Travel Plan itself and implementation and enforcement secured through the section 106 agreement. However, the Council agreed that this should be explained in the RJ and have proposed a minor modification to this effect.

#### Policy AAP21: Harrow Waste Management Site

5.13 The GLA sought two changes to the Policy to ensure it more accurately reflected the more detailed policy criteria and requirements of the London Plan. Both changes were considered acceptable to the Council, although it notes that, with respect to the requirement to maintain or make compensatory provision for the maximum throughput capacity, the current depot site, although allocated for waste management is not in operational use, and therefore any throughput capacity is assumed to be theoretical. The only other representation received to the Policy was made by Campaign for a Better Harrow Environment who thought the Policy should include use of rail to transport waste given the site's location next to the mainline railway line. In response, the Council clarified that Network Rail had advised that they do not support proposals for railheads that would be accessed directly from the mainline, as would be the case for the depot site, due to operational capacity and safety concerns.

#### Chapter 5: Sub Area and Site Specific Guidance

5.14 Two representations were received that were relevant to the content of all of Chapter 5. The first by CBRE on behalf of Dandara who object to the use of concept plan illustrations and request these all be removed or caveated to highlight their status as sketches only. In its response the Council notes that such a caveat was included in the introduction to Chapter 5 in response to the same comment being made by the respondent at the Preferred Option stage. The other representation was from English Heritage which requested that all site illustrations should show the proximity of heritage assets. In response the Council noted that most of the site allocations made reference to listed buildings or conservation areas that neighboured the development site. However, the Council agreed that such information was always useful to highlights and would only require minor amendments to one or two other sites to satisfy this request.

#### Sub Area Wealdstone West

5.15 The only representation received was that by English Heritage who had raised concerns to the planning application on the Zoom Leisure site and the location of proposed development in relation to the Headstone Manor complex. The Council noted that the requirement to ensure Headstone Manor was provided an appropriate setting was already included as a site constraint to the Zoom Leisure development but agreed that this could usefully form a key objective to the sub area as a whole. However, the Council also noted that the Zoom Leisure (Kodak) development had already been granted outline planning permission, so the effect of such change was likely to be limited.

#### Site 2 – Kodak and Zoom Leisure

5.16 Representations were received by the GLA who confirmed that the changes to the site specific guidance, to more closely reflect the granted outline planning permission, were supported. However, they sought amendments in respect of the proposed boundary of the consolidated SIL and to the monitoring of the retail impacts of the granted outline planning application. Following further discussion with the GLA about the options available for re-drawing the SIL boundary, it was agreed that the best approach would be to draw the boundary tightly to just the employment use areas, thereby excluding non-SIL uses. With regard to the request to acknowledge in the text that retail development in this location must not undermine the vitality of nearby town centres, the Council considered that such a requirement would be ultra vires – with both authorities having recently granted planning permission for the quantum now set out in the AAP site allocation for this site. The only other comment was from a resident who is opposed to the development on the open space at the Zoom Leisure site and suggests a policy is required to protect all open space. In response the Council notes that such a policy already exists within the Core Strategy but that in the case of the Kodak development, the policy allows for the reconfiguration of open space where this would not result in a net loss – which in the case of the Kodak permission actually results in a small gain overall and was therefore acceptable and permission granted.

#### Site 3 – Teacher's Centre

5.17 Two representations were received both from local residents opposing the allocation of the site for a secondary school on the grounds on traffic impacts and cumulative impacts associated with existing neighbouring secondary schools. In response, the Council notes that the site has a long history of education use, that there is an identified need for a new secondary school to serve the area; that alternative sites had been evaluated but ruled out and that, in response to concerns regarding traffic, the boundary of the site had been extended to provide opportunity for on-site solutions to be explored.

#### Site 4 - ColArt

5.18 The representations received to this allocation were both made by the proponents of a proposed development of the site. The concerns raised related to the fact that Council had, in error, included an out dated site illustration, which had been the subject of amendment and agreement between the parties at pre-application discussions. In response, the Council acknowledged its error and proposed to replace the site illustration with the agreed updated version through the proposed minor modifications.

#### Wealdstone Central Sub Area

5.19 A representation was received by CgMs on behalf of the Metropolitan Police Service that sought to make the case for the allocation of the Wealdstone Police Station for housing-led redevelopment. The Council reiterated its previous comments and correspondence made to the agents for the Police Service, which clarified that the Core Strategy includes Policy CS1Z which resists the loss of community facilities unless adequate arrangements are in place for their replacement. The Council had therefore requested previously that the agents provide such evidence as appropriate to satisfy the Council the policy requirement and adequately

demonstrate how the Borough's future policing accommodation requirements were to be met. Again, such evidence had not been submitted, and again the Council responded that it could not support the allocation of this site as it would be contrary to the Core Strategy policy.

#### Site 18 – 17-51 College Road

5.20 Three representations were received to this site's allocation. The one from Campaign for a Better Harrow Environment requested that the Council re-visit the acceptance in principle of an up to 19 storey building on this site in light of the new views assessment. In response the Council noted that the fact the Council had undertaken a new borough-wide views assessment, this did not concern individual sites, and therefore did not overcome the material consideration in respect of site 18. The other two representations were made by proponents of a scheme for this site. Both representations were concerned with the expansion of the site boundary to take in neighbouring sites as well as their own, and the implication that a site-wide comprehensive scheme was therefore required which might prejudice them bring forward a scheme just for their portion for their portion of the site. In response the Council had set out its reasons for expanding the site boundary, which it considered would overcome many of the constraints previously identified to bringing the former post office site forward in isolation. The Council however agreed that the policy preference was to see a workable site-wide approach but that the intent of the policy was not to prevent an individual sites being developed where a site-wide solution could not be agreed. The representations also sought other changes associated with the requirement to establish a new view from within the site to St Mary's Church and in respect of building heights, provision for viewing platforms within a tall building, and provision for community/civic use. The Council considered that the policy position with respect to each of these requirements was clear and therefore, with the exception of only minor changes, did not support the amendments sought.



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).

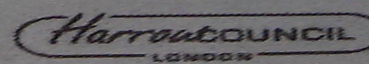
Representations may be accompanied by a request to be notified at a specific address about the submission of the DPDs to the Secretary of State for examination in public.

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

 **Harrow COUNCIL**  
LONDON

Reference Location:  
**Proposa**  
**EXTENSI**  
**Reason 1**  
**Referenc**  
**Location:**  
**Proposal:**  
**BUILDING**  
**ALTER PR**  
**EAST END**  
**Reason fo**  
**Reference**  
**Location:**  
**Proposal:**  
**P/0845/11**  
**TERRACE**  
**SOUTH OF**  
**NEW WIND**  
**Reason fo**

#### Lice Notice of Ap

An application  
Fridays UK Ltd  
for premises to  
Units 1-4, Lakes  
Outlet, Wemble

The application  
the supply of al  
every day. Late  
be permitted un

The full applicat  
the application  
of the licensing  
349-357 High  
HA9 6EP during  
advance to che  
be available at

Interested parti  
can make repr  
Authority by 21

All representa  
writing.

It is an offence  
Licensing Act 2  
or knowingly  
connection w  
The maximum

**BERWIN LEIG**

**NEW**



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



Stuart Liddington  
Local Plans 3/12 Kite Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Place Shaping  
Andrew Treherm  
Corporate Director

23 July 2012

Dear Sir / Madam,

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

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:

- The Harrow and Wealdstone Area Action Plan;
- The Development Management Policies DPD; and
- The Site Allocations DPD.

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 **27<sup>th</sup> July to 7<sup>th</sup> September 2012**.

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 & 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 DPDs.

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 DPDs’ from the 27<sup>th</sup> July to the 7<sup>th</sup> September 2012.

I am pleased to enclose a Statement of Representations Procedure, which provides details of how to comment on the DPDs and where the documents have been made available to view. In summary, comments 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); or
- by post to: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Station Road, Harrow, HA1 2UJ.

Harrow Council, Planning Department, P O Box 37, Civic Centre, Station Road, Harrow, HA1 2UY  
tel 020 8736 6069 email [info@harrow.gov.uk](mailto:info@harrow.gov.uk) web [www.harrow.gov.uk](http://www.harrow.gov.uk)

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 DPDs. **Comments must be received by 5pm on Friday 7<sup>th</sup> September 2012.**

Comments may be made in support of aspects of the DPDs 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, [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf), in the appendices to each DPD, and in the notes accompanying the standard response form.

The DPDs, Sustainability Appraisal and additional supporting evidence base, are available to view and download from the Council’s website: [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf). An interactive version of each DPD and Sustainability Appraisal is available via the Council’s consultation portal: <http://harrow-consult.limehouse.co.uk>, 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.

**Next stages**

Following the end of the consultation period, copies of all responses received will be forwarded to the Planning Inspectorate for consideration alongside the Submission DPDs, 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.

The Council anticipates the Examination in Public will take place in December 2012 or January 2013. We will regularly update our website [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf) 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 [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk).

Yours faithfully,

**Matthew Paterson**  
LDF Team Leader  
Harrow Council

## 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	Road Haulage Association	Genesis Housing Group (PCHA Maintenance)
Civil Aviation Authority Safety Regulation Group	Iceni Projects	Pathmeads Housing Association Ltd
London Borough of Hounslow	GLA Biodiversity Group Strategy Directorate	Genesis Housing Group
London Councils	London Underground	Home Group (Regional Development Director)
London Development Agency	Harrow Hill Chamber of Commerce	Dimensions (UK) Limited
Harrow and Hillingdon Geological Society	London Underground Limited Infrastructure Protection	Housing 21
Shepherds Bush Housing Association Limited	Drivers Jonas	Warren House Estate Residents Association
Paddington Churches Housing Association Ltd	RPS Group Plc	Worple Residents Association
Paradigm Housing Association	Pro Vision Plann & Design	Augustine Area Residents and Tenants Association
Housing Corporation	DPDS Consulting Group	Roxbourne Action Group (RAG)
Chiltern Hundreds Housing Association (Paradigm Housing Group)	Dalton Warner Davis	Aylwards Estate Residents' Association
Shepherds Bush Housing Association Limited	Oxalis Planning	Canning Road Residents Association
Stanmore Christian Housing Association Limited	Andrew Martin Associates	Cannons Community Association
Peabody Trust	Barton Willmore	Canons Park Estate Association
The Abbeyfield Harrow Society Limited	WS Planning	Canons Park Residents Association
The Guinness Trust	PB	Alexandra Avenue(Newton Farm) Tenant's Association
Innisfree Housing Association	Turley Associates	Barrowdene Residents Association
Sutherland Housing Association Limited	GL Hearn Property Consultants	Belmont Community Association
Inquilab Housing Association Limited	The London Planning Practice	Arrowhead Parade Tenants & Residents Association
Haig Homes	Halcrow Group	Bentley Priory Residents Association
Anchor Trust	Urban Initiatives	Bentley Way Association
Apna Ghar Housing Association Limited	Brown Associates	Blenheim Road Action Group
Network Housing Group	Strategic Leisure	Brookshill Residents Association
Origin Group	Capita Symonds	Afganstan Housing Association
Home Builders Federation	Knight, Kavanagh & Page	Cherry Croft Residents Association

CB Richard Ellis  
Nathaniel Lichfield and Partners  
URS Corporation Ltd  
WYG Planning & Design  
Tribal  
Tym & Partners  
  
CGMS Consulting  
DP9 Town Planning Consultants  
MEPK Architects  
Metropolis PD  
Octavia Housing  
Metropolitan Housing Trust Limited  
Notting Hill Housing Trust  
Housing 21  
Stadium Housing Association Limited  
Servite Houses  
LHA-ASRA Group  
Veldene Way Residents Association  
Victoria Terrace Residents Association  
Elmwood Area Residents' Association  
Elstree Village Association  
Gayton Residents Association  
Harrow Weald North Residents Association  
Harrow Weald Tenants and Residents Association  
Thurlby Close Residents Association  
Tyrell Close Tenants Association  
Gleneagles Tenants Association  
Golf Course Estate Association  
Atherton Place Tenants' Association  
South Hill Estates Harrow Ltd  
Herga Court Residents Association  
Gordon Avenue Residents Association  
Hobart Place Residents Association  
Grange Farm Residents Association  
Greenhill Manor Residents Association  
Greenhill Residents Association  
Greville Court Residents Association  
Grove Tenants & Residents Association  
Hardwick Court Maisonettes Association  
Jubilee Close & James Bedford Close Residents Association  
Kenmore Park Tenants and Residents Association  
Kenton Area Residents Association  
Honeybun Tenants Association  
Sonia Court Residents Association  
Rowlands Avenue Residents Association  
Roxborough Park Residents Association  
Roxborough Residents Assoc.  
Roxborough Road Residents Association  
Rusper Close Residents Association  
Queensbury Circle Tenants Association  
The Pinner Association  
The Pynnales Close Residents Association  
Sudbury Court Residents Association  
Eastcote Village Residents Association

MWH Global  
Gregory Gray Associates  
First Plan  
Daniel Rinsler & Co  
Yurky Cross Architects  
Jones Lang LaSalle  
UK Planning Manager  
Dandara Ltd  
Saunders Architects LLP  
Savills  
Alsop Verrill  
Colliers CRE  
CB Richard Ellis Ltd  
Berkeley Homes  
Cluttons LLP  
DTZ  
Elm Park Residents' Association  
Wilton Place Residents Association  
Rayners Lane Tenants & Residents Association  
South Harrow & Roxeth Residents Association  
The Clonard Way Association  
The Cresnet Residents Association  
South Hill Estates Residents Association  
South Hill Residents Association  
South Stanmore Tenants & Residents Association  
Lodge Close Tenants Association  
Pinnerwood Park Estate Residents Association  
Merryfield Court Residents Association  
Pinner Road & The Gardens Residents Association  
Pinnerwood Park C.A. Residents Association  
Manor Park Residents Association  
Letchford Terrace Residents Association  
Laburnum Court Residents Association  
Laing Estates Residents Association  
Hardwick Close Flats Association  
Harrow Civic Residents Association  
Oak Lodge Close Residents Association  
Harrow Federation of Tenants & Residents Associations  
Pinner Green Council Tenants Association  
Pinner Hill Residents Association  
Pinner Hill Tenants & Residents Association  
Nicola Close Residents Association  
Orchard Court Residents Association  
South West Stanmore Community Association  
Princes Drive Resident Association  
Priory Drive Residents Association  
Sheridan Place Residents Association  
Northwick Manor Residents' Association  
Nugents Park Res Association  
Mount Park Residents Association  
Harrow Hill Residents Association  
Hatch End Association  
The Waxwell Close Association  
Hathaway Close Residents Association  
Abchurch Residents Association

Chichester Court Association  
Claire Court, Elm Hatch, Cherry Croft Residents Association  
Claire Gardens Residents Association  
Colman Court Residents Association  
Copley Residents Association  
Waxwell Close Association  
Wealdstone Residents Action Group  
Wemborough Residents Association  
West Harrow Residents Association  
Corbins Lane Residents Assoc.  
Cottesmore Tenants & Residents Association  
Crown Sreet & West Sreet Area Residents Association  
Cullington Close Tenants Association  
Dalkeith Grove Residents Association  
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  
Royal Association in Aid of Deaf People  
Royal National Institute For The Deaf  
Kenton Lane Action Group  
Kerry Court Residents Greensward Properties Ltd  
Grimsdyke Golf Club  
Stanmore Chamber of Trade  
Herts & Middx Wildlife Trust  
Tempsford Court Management Company Ltd  
Wembley Rugby Club  
English Golf Union  
Harrow Heritage Trust  
St Mary's Church  
Harrow High Street Association  
Friends of Bentley Priory National Reserve



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

Hazeldene Drive Tenants & Residents Association  
Harrow Dental Centre  
Abbey Dental Practice  
B Cohen Dental Practice  
Bridge Dental Practice  
Bright Dental Practice  
DentiCare  
Dr K A Nathan Dental Practice  
Dr Tikam Dental Surgery  
Family Dental Care  
G Bhuva & J Bhuva Dental Practice  
Harrow View Dental Surgery  
Harrow Weald Dental Practice  
M Ali Dental Practice  
N Bahra Dental Practice  
S Aurora Dental Practice  
Village Surgery  
Preston Medical Centre  
Streatfield Surgery  
GP Direct Medical Centre  
Pinn Medical Centre  
Simpson House Medical Centre  
Enderley Road Medical Centre  
Elliot Hall Medical Centre  
Aspri Medical Centre  
Bacon Lane Surgery  
Blackwell House Surgery  
Chandos Surgery  
Charlton Medical Centre  
Civic Medical Centre  
Dr. Eddington & Partners (1)  
Dr. Gould & Partners  
Dr. Merali & Partners (1)  
Dukes Medical Centre  
Fryent Way Surgery  
Hatch End Medical Centre  
Headstone Lane Medical Centre  
Headstone Road Surgery  
Honeypot Medical Centre  
Stimpsons  
Mr David Cobb  
Pegley D'Arcy Architecture  
John Phillips  
NVSM Ltd  
Roger Hammond  
Preston Bennett Holdings Ltd  
Studio V Architects  
Stephen Wax Associates Ltd  
W J McLeod Architect  
J G Prideaux  
Steene Associates (Architects) Ltd  
Stanmore College  
Racal Acoustics Ltd  
Lloyds TSB  
The White Horse PH

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

Mind in Harrow  
Community Link Up Inclusion Project  
Royal National Institute for Blind People  
Royal National Institute for the Deaf  
People First  
Disability Awareness in Action  
National Centre for Independent Living  
Headmaster, Harrow School  
Our Lady & St Thomas of Canterbury  
Pinner Hill Golf Club  
Pinner Historical Society  
Northwood & Pinner Chamber of Trade G Lines  
Peterborough and St Margarets High School for Girls  
Pinner Local History Society  
Pinner Local History Society  
David Kann Associates  
Aubrey Technical Services  
Mr M Solanki  
Mr A Modhwadia  
Mr S Freeman  
RKA Architecture  
Madhu Chippa Associates  
Mr J Benaim  
Orchard Associates  
KDB Building Designs  
Jeremy Peter Associates  
JC Decaux UK Ltd  
Dennis Granston  
K Handa  
Gillett Macleod Partnership  
D Joyner  
S Mistry  
Saloria Architects  
Simpson McHugh  
Jeffrey Carr  
KDA Designs  
Mr Gow  
Home Plans  
KCP Designs  
John Evans  
Sureplan  
J Loftus  
V Sisodia  
Anthony Byrne Associates  
Top Flight Loft Conversions  
S Vekaria  
A Frame  
David Barnard  
A Laight  
B Dyer  
Sheeley & Associates  
Michael Hardman  
Canopy Planning Services  
E Hannigan  
Plans 4 U

Curry Popeck Solicitors  
Allan Howard & Co Estate Agent  
Miss K Mehta  
Mrs Dedhar  
Mr Jay Lukha  
Mr Patel  
Mr Lodhi  
Mr James Palmer  
Mr Harshan  
Mr Sam Fongho  
Mr A Ahiya  
Ms Pauline Barr  
Apollonia Restaurant  
Mr Harsham  
Mr Mark Roche  
Ms Cacey Abaraonye  
Mr R Shah  
Mr Terry Glynn  
Nugents Park Residents Association  
Linda Robinson  
Roxborough Road Residents Association  
Bryan Cozens  
Merryfield Gardens Residents  
John Richards & Co  
Mr Cunliffe  
LRHEquipment Hire  
Mr H Patel  
Le Petit Pain  
Mrs Jacqueline Farmer  
Mr Rashmin Sheth  
R Raichura  
Pharaoh Associates Ltd  
Mr Paul Bawden  
Mr Kumar  
Mr Deva  
Mrs Jill Milbourne  
Mr Yousif  
Ms Michelle Haeems  
Mrs Mandy Hoellersberger  
Mr George Apedakih  
Mr H Khan  
Mr John Fitzpatrick  
Mr and Mrs Siddiqi  
Mr Shah  
Mr Goreeba  
Ms Anna Biszczanik  
Bhojani, Bhojani Properties Ltd  
Mr Damian Buckley  
Mr Asury  
Mrs Trivedi  
Mr Mark Fernandes  
Mr M Selvaratnam  
Miss Da Cruz  
Mr Mohammed Hyder  
Mr P Allam

G E Pottle & Co  
Geoffrey T Dunnell  
Jackson Arch & Surveying  
H Patel  
J Driver Associates  
John Hazell  
James Rush Associates  
Kenneth W Reed & Associates  
Naren Hathi  
Lawrence-Vacher Partnership  
Robin Bretherick Associates  
Patel Architects Ltd  
PCKO Architects  
Pearson Associates  
Pindoria Associates  
Richard Sneesby Architects  
Mr P Varsani  
Satish Vekaria  
S S & Partners  
Survey Design (Harrow) Ltd  
V J McAndrew  
Nafis Architecture  
N M Architects  
Mr Ian Murphy  
Gibbs Gillespie Estate Agent  
Mr AbdulNoor  
Mr B Nieto  
Ms Jean Altman  
Mr Murray  
Mrs Tsang  
Paige & Petrook Estate Agent  
Mr G Trow  
Mr Parekh  
Mrs Walker  
Mr Abood  
Mr Sanders  
Mr Tom Johnstone  
Mr Daniel Petran  
Marchill Management Ltd  
Mr Milan Vithlani  
Miss Wozniak  
Ms Erika Swierczewski  
Mr Anat  
Mr Patel  
Mr T Karuna  
Hair 2 Order  
Mr John Imade  
I Muthucumarasamy Inthusekaran  
Ms Marli Suren  
Mr M Meke  
Team 2 Telecommunications Ltd  
Mr Sadiq  
Mr Gilani  
Mr D Burton  
Foxon Property

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

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

Mr Reidman  
Mr Dillon  
Mr E Campbell  
Doctor A Savani  
Doctor Samantha Perera  
Ms Mc Gleen  
Mr Shemsi Maliqi  
Mr Delroy Ettienne  
Mrs Gohil  
Ms Yvonne Afendakis  
Miss M Lean  
Mr Z Hansraj  
Mr Raja  
Ms Grace Ellis  
Doctor Amin  
Mr Noel Sheil  
Mr Shah  
Mr Singh  
Mrs Cirillo  
Mr Gary Marston  
Mrs Lilley  
Mr Michael Foti  
Helen Stokes  
Mrs S Narayan  
Mr Depaie Desai  
Mr D Morgan  
Mrs K V Hirani  
Mr Christopher Dixon  
Mr and Mrs Patel  
Mrs M Patel  
Mr P Mantle  
Mrs D Nagewadia  
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 Karaikos  
High Lawns Hostel  
Mr Patel  
Ms Mullins  
Miss Innis Davis,  
Mr Sanjay Patel



Mrs Senanayake  
Ventra Management Ltd  
Mssr H Carolan  
Vantage Property Services  
Rawlinson Gold Estate Agent  
Mr R Shah  
Mr J Meegama  
Mr C Patel  
Mr N Shah  
Mr Alpesh Patel  
Mrs Deroy  
Mrs H Pereira  
Ms Alison Wood  
David Conway & Co Estate Agent  
Mr Sandu & H Singh  
Mr R Jani  
Mr Dar  
Bathrooms/Kitchens/Conservatories  
Mr Black  
D Shemie  
Mr A Kidwai  
MR Farhan Ebrahimjee  
Camerons Jones  
Mr D Saran  
Mr A Maragh  
Mr M Mockler  
Mr Bellank  
J B Webber Chemist  
Mr B Patel  
Panstar Group Ltd  
Stephen J Woodward Ltd  
Mr Hedvit Anderson  
Mrs Senanayake  
Mr Mitesh Vekaria  
Mr S Sharma  
Mr Jiten Soni  
Doctor A Savani  
Mrs Uzma Awam  
Mrs Nishma Palasuntheram  
Mr Mahmood Sheikh  
Mr Brian Watson  
Mr K Weerasinghe  
Ms Vanisha Patel  
Mr Vyas  
Mr A Clifford  
Mrs Shelagh Kempster  
Blue Ocean Property Consultant  
Mrs Roth  
Mr Kevin Conlon  
Mr Ramchurn  
Mr K Jabbari  
Mr McCormack  
Mrs Kettles  
Mr Rulamaalam Asokan  
Mr Alexis

Mrs Anastasia Marshall  
Mr V Sorocovich  
Dr Vara  
Hinton & Bloxham Estate Agent  
Raka Properties & Lets Ltd  
Mrs Liza  
Mr Prajesh Soneji  
Mr Shah  
Mrs Amanda Fogarty  
The Rollands Phelps  
Cameron & Associates  
PK Properties Estate Agent  
Mrs Ved  
Mrs N Hindocha  
Mr Richards  
Mr Jeff Panesar  
Mr M Haq  
Mr Sidhu  
Playfield Management  
SPLA  
Middlesex Properties  
Mr M Fazio  
Quainton Hall School  
Mr Goodman  
Mr A Hanefey  
Mr Kahn  
Mr Jonjan Kamal  
Luigi Hairdresser  
Ms Lindsey Simpson,  
Mr David Benson  
Mr D'Souza  
Mr Arshad Minhas  
Dr P Sadrani  
Mr Eric Lipede  
Mrs McKenzie  
Mr C Mohotti  
Mr Dalius  
Miss M Patel  
Mr K Nava  
Mrs Trivedi  
Mr MH Asaria  
Mr N Johnstone  
Miss F Khan  
Mr A Balasusriya  
Mr John Campbell  
Mr P Lewis  
Miss Shah  
Mrs Regunathan  
Mr Dattani  
Mr Brian Lampard  
Mr Ralph Jean-Jacques  
Mr Rupesh Valji  
Chase Macmillan Estate Agents  
Mrs O'Sullivan  
Mrs D Ahmed

Skippers Fish & Chips  
MPS Architects  
Mr Lavin  
Mr Stephenson Mallon  
Mr Pravin Bhudia  
Mrs Sandra Jenkins  
Mr P Nathan  
Cumberland Hotel  
MR Pulford  
Tisser and Aromatherapist  
Mr R Dutt  
Mr Lanagan  
Mrs Garner  
Ms J Sanagasegaran  
Mr Mohamed Ariff  
Mrs Elliot  
Mr N Radia  
Mrs S Akhtar  
MR Taylor  
Castle Estates  
Mr Sturrock  
Mr Mathew Hutchinson  
Mr Bhupinder Singh  
MRs J Ahilan  
Ms F Bajina  
Anscombe & Ringland Est Agent  
Mr NG Lakhani  
Mr Campbell  
Mrs R Draycott  
Stephen J Woodward Ltd  
Mr G Trow  
Burgoyne Johnston Evans  
Wilson Hawkins & Co  
Mr N Patel  
Mr Antonio Branca  
Mr Brijesh Mistry  
Mr Sanjay Naran  
Mr Mohamed Agwah  
Mr Ramzan Farooqi  
Mr A Jaroudi  
Mrs Jacqueline Pepper  
Mr Patrick Curran  
Mrs Jacqueline Pepper  
Mr Saleem  
Mr William Hunter  
Mrs Q Chow  
Mr Khan  
Mr Dene Burton  
Mr Deva  
Mr B Desai  
Miss J Parker  
Mr R Carnegie  
Mr James Kearney  
Mr A Ahmed  
Mr G Puvanagopan

Mr Raymond

Mr Dene Burton

Mr Patrick Curran

## Appendix D – Statement of Representation Procedure

### 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, <del>Thurs</del> 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, <del>Thurs</del> 9.00 – 8.00pm 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, <del>Thurs</del> 9.00 – 8.00pm 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, <del>Thurs</del> 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, <del>Thurs</del> 9.00 – 8.00pm 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, <del>Thurs</del> 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, <del>Thurs</del> 9.00 – 8.00pm 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, <del>Thurs</del> 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 2UJ; or
- by fax to: 020 8424 8151

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

**Comments must be received by 5pm on Friday 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



Stuart Liddington  
Local Plans 3/12 Kite Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Place Shaping  
Andrew Trehern  
Corporate Director

23 July 2012

Dear Sir / Madam,

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

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:

- The Harrow and Wealdstone Area Action Plan;
- The Development Management Policies DPD; and
- The Site Allocations DPD.

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 **27<sup>th</sup> July to 7<sup>th</sup> September 2012**.

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 & 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 DPDs.

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 DPDs' from the 27<sup>th</sup> July to the 7<sup>th</sup> September 2012.

I am pleased to enclose a Statement of Representations Procedure, which provides details of how to comment on the DPDs, and where the documents have been made available to view. In summary, comments 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); or
- by post to: FREEPOST RLZL-GGTG-YBTG, LDF Consultation, Planning Policy, Harrow Council, Civic Centre, PO Box 21, Station Road, Harrow, HA1 2UJ.

Harrow Council, Planning Department, P O Box 37, Civic Centre, Station Road, Harrow, HA1 2UY  
tel 020 8736 6069 email [info@harrow.gov.uk](mailto:info@harrow.gov.uk) web [www.harrow.gov.uk](http://www.harrow.gov.uk)

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 DPDs. **Comments must be received by 5pm on Friday 7<sup>th</sup> September 2012.**

Comments may be made in support of aspects of the DPDs, 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, [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf), in the appendices to each DPD, and in the notes accompanying the standard response form.

The DPDs, Sustainability Appraisal and additional supporting evidence base, are available to view and download from the Council's website: [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf). An interactive version of each DPD and Sustainability Appraisal is available via the Council's consultation portal: <http://harrow-consult.limehouse.co.uk>, 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.

**Next stages**

Following the end of the consultation period, copies of all responses received will be forwarded to the Planning Inspectorate for consideration alongside the Submission DPDs, 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.

The Council anticipates the Examination in Public will take place in December 2012 or January 2013. We will regularly update our website [www.harrow.gov.uk/ldf](http://www.harrow.gov.uk/ldf) 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 [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk).

Yours faithfully,

**Matthew Paterson**  
LDF Team Leader  
Harrow Council



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 DPDs 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



**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](mailto: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)
--	--	-------------------------------------

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)**

\*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.

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"/>



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

Name or Organisation :

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

Paragraph  Policy  Proposals Map

4. Do you consider the DPD is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound*	Yes	<input type="text"/>	No	<input type="text"/>

*\*The considerations in relation to the DPD being 'Sound' are explained in the National Planning Policy Framework, paragraph 182. If you have entered No to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

5. Do you consider the DPD is **unsound** because it is not:

(1) Justified	<input type="text"/>
(2) Effective	<input type="text"/>
(3) Consistent with national policy	<input type="text"/>
(4) Positively Prepared	<input type="text"/>

6. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

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

7. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.*

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination  Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:  Date:

## Appendix I – List of Respondents to the AAP Pre-Submission Consultation

<b>Respondent ID</b>	<b>Respondent</b>	<b>Respondent ID</b>	<b>Respondent</b>
1	Hertsmere Borough Council	13	CgMs on behalf of the Mayor's Office for MOPAC & MPS
2	Cllr Phillip O'Dell	14	Christopher Langley
3	Anne Swinson - Hatch End Association	15	GVA on behalf of AIB Ltd
4	Thames Water	16	Mr Michael Loundes on behalf of Lindengruppen (ColArt) Ltd
5	Greater London Authority	17	RPS on Behalf of Person Pension Property Fund
6	Natural England	18	The Environment Agency
7	Three Rivers District Council	19	Turley Associates
8	Mrs Sheridan Maple	20	Transport for London Property Development
9	Campaign for a Better Harrow Environment	21	Sandra Lee Palmer
10	CBRE on behalf of Dandara Ltd	22	English Heritage
11	The Roxborough Residents Association		
12	Preston Bennett on behalf of MP&G Trading Ltd		

## Appendix J - Schedule of Representations to the Pre-Submission Heart of Harrow AAP Ordered by Respondent

### Respondent 1: Hertsmere Borough Council

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
1	001	Hertsmere Borough Council	Whole DPD	Yes	We have no comments to make in relation to the policies proposed in the Harrow and Wealdstone Area Action Plan.	None	Yes	The Council notes that the Borough Council has no comments to make in relation to the AAP policies.

### Respondent 2: Councillor Phillip O'Dell – Ward Councillor for Wealdstone

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
2	002	Cllr O'Dell	Whole DPD	N/S	I object to preferred option for the Heart of Harrow. Including Station Road in the plan will only eventually lead to the one centre option with Wealdstone losing its distinct character as identified in the original document. This would severely impose a loss of amenity to my constituents.	N/S	N/S	The LDF Panel, at its meeting of 26 July 2011, considered the representations and the analysis of responses received to the AAP Issues and Options consultation and endorsed the officer recommendation that the preparation of the Council's preferred option for the AAP be based upon the support received to strategic spatial development Option 4 but having regard also to the comments and considerable support received to Option 3. Feedback from the representations was clearly in favour of the inclusion of Station Road. The AAP Preferred Option document was then approved by full Council on 15 December 2011 and subject to public consultation from 12 January to 23 February 2012. With the exception of this consultee, no other representations were received that objected to the overall spatial strategy the Council had set out in the AAP Preferred Option. Rather, numerous comments were made in support of the inclusion of Station Road. Based on this majority positive view of the benefits to be achieved through the inclusion of Station Road within the AAP, the Plan has been developed on that basis. <b>No change</b>
2	003	Cllr O'Dell	AAP Site 4: ColArt	N/S	ColArt Site - I oppose using this site for housing as the area is suffering from higher than average unemployment and the employment use must be retained. should be This will again lead to loss amenity to my residents from extra traffic and air quality	Suggests the respondent seeks to retain the ColArt site in its existing industrial land designation	N/S	The Employment Land Review highlights the lack of demand for industrial uses in the borough, especially large industrial units. The key consideration for this site is in securing new jobs equivalent in number to that achieved when Colart were in operation. Enabling residential development will be required to deliver new employment space and community use, and therefore the allocation of the site for employment-led mixed use development has not changed. <b>No change</b>
2	004	Cllr O'Dell	AAP Site 3: Teachers Centre	N/S	Teachers Centre - I oppose this site being used a school this will result in loss of amenity of my constituents by creating extra traffic congestion. The area is already severely affected by anti-social behaviour from the existing High Schools in the area. The area already lies within a CPZ any therefore any development of a school will add to the already recognised problems in the area.	Suggests respondent seeks the removal of the allocation of the site for D2 Education use. NB: no alternative use is offered by the respondent, so suggests the respondent wishes to see the site remain unallocated.	N/S	The site has a long history of education use, and therefore remains the Council's preferred option for a new secondary school, serving both the new Intensification Area as well as the wider borough. Further changes have been made to extend the boundary of site to take in the builder's yard on Cecil Road, the Whitefriars Industrial Estate and Aerospace House. The designation will provide for continued industrial use of these sites as well as for further education use, enabling the consideration of a much larger parcel of land to provide further options to accommodate a new school more comfortably on the site. It will also enable wider options to be considered to mitigate the traffic impacts arising from any school proposal. While TfL have modelled these impacts, the mitigation will need to respond to the final school proposal for the site, and

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
								being a free school, this remains unknown at this time. Further consultation with the community will therefore need to take place prior to application coming forward for a new school on the site. The Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. These requirements are specified in the AAP. <b>No change</b>

N/S – Not Specified

### Respondent 3: Anne Swinson - Hatch End Association

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
3	005	Anne Swinson Hatch End Association	Chapter 3: Vision and Spatial Strategy, paragraph 3.4/3.5	N/S	Was the quality of schools in the 21st century intentionally omitted?	N/S	N/S	The Council agrees that the borough schools are a valued and essential element of 21 <sup>st</sup> Century Metro-land and should be referenced in paragraph 3.5 – <b>see proposed minor modification no. AAP2</b>
3	006	Anne Swinson Hatch End Association	Policy AAP1: Development within Harrow town centre, Part A/g	N/S	Error	Final word "overtime" should read "over time".	N/S	Agreed, error needs correcting – <b>see proposed minor modification no. AAP3</b>
3	007	Anne Swinson Hatch End Association	Policy AAP3: Wealdstone, Part D/d	N/S	Clarity	The text "the primary and enabling development" is not clear. And should "conforms" read "conform"?	N/S	Agreed, error needs correcting – <b>see proposed minor modification no. AAP4</b>
3	008	Anne Swinson Hatch End Association	Policy AAP 6: Development height, paragraph 4.62	N/S	Landmark buildings should exclude "active ground floor activities" which are liable to be ephemeral or shoddy, such as stalls and the like.	Any retail element should therefore be described as having a "permanent" character.	N/S	Disagree. The requirement is for active ground floor uses, which may include but are not limited to just retail uses. The AAP (see Policy AAP 4 a) is clear that all development is to be of a high quality. Therefore the Council will require the provision of high build quality ground floor units to be provided for active uses (commercial or otherwise). However, it is beyond the scope of the Plan and the planning system to control the quality of the operator/occupier of such units – such matters are for the market to determine. <b>No change</b>
3	009	Anne Swinson Hatch End Association	Glossary	N/S	Error	Previously Developed Land - last sentence should be "whole of the "curtilage" not "cartilage".	N/S	Agreed, error needs correcting – <b>see proposed minor modification no. AAP36</b>

N/S – Not Specified

### Respondent 4: Thames Water

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
----	---------	------------	------------------------	-------	------------------	--------	-------	-------------------------------



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
4	010	Thames Water	Policy AAP9: Flood Risk and Sustainable Drainage	No Not effective & not consistent with national policy	<p>We do not object to the policy in principle, but consider that it does not adequately cover sewerage 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>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, relates to Water Quality and Wastewater Infrastructure and states:</p> <p><b><i>“LDF preparation E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.”</i></b></p> <p>Policy 5.15 relates to Water Use and Supplies.</p> <p>It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. Thames Water is concerned that the network in this area may be unable to support the demand anticipated from this development. The AAP therefore needs to consider the net increase in water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</p> <p>The list of issues covered in the AAP should therefore make reference to the provision of water and sewerage infrastructure to service development as follows:</p> <ul style="list-style-type: none"> <li>• The areas demand for water network infrastructure both on and off site and can it be met</li> <li>• The developments demand for sewerage network infrastructure</li> </ul>	<p>To accord with the NPPF and the London Plan text along the lines of the following section should be added to the AAP:</p> <p><b><i>“Water Supply &amp; Sewerage Infrastructure</i></b></p> <p><b><i>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure 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.</i></b></p>	N/S	<p>The Core Strategy already includes Core Policy CS1Z 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 CS1Z 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 AAP, 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>In light of the representation made by this respondent at the Preferred Option stage, the reasoned justification to policy AAP 9 was amended to draw attention to those AAP Opportunity Sites where Thames Water had raised concerns regarding waste service 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 CS1Z and paragraph 4.112 of the AAP adequately addresses the respondents concerns.</p> <p><b>No change</b></p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					<p>both on and off site and can it be met</p> <ul style="list-style-type: none"> <li>The surface water drainage requirements and flood risk of the area and down stream and can it be met</li> </ul> <p>In relation to flooding, Thames Water consider the AAP should include guidance 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 sea which includes "Flooding from Sewers".</p> <p>The AAP 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>			

N/S – Not Specified

#### Respondent 5: Greater London Authority

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	011	Greater London Authority	Whole DPD	Yes	It is my opinion that the proposed submission document is in general conformity with the London Plan. However, please note that the abovementioned report and appendix include representations which seek to clarify or improve policy with the consultation document.	None	Yes	The Council welcomes the Mayor's confirmation that the AAP is in general conformity with the London Plan, and thanks the GLA for their further comments as well as their continued engagement in the production of the AAP. Post adoption, the Council looks forward to continuing this positive relationship into the implementation phase.
5	012	Greater London Authority	Figure 1.1 Heart of Harrow AAP location	Yes	General comment - For ease of reference, the Council is invited to include the town centre boundaries for Harrow metropolitan town centre and Wealdstone district centre on this diagram, as well as Metropolitan Open Land, open space, opportunity sites, and the intensification area boundary.	Include the town centre boundaries in the diagram of Figure 1.1	Yes	The Council agrees that it would be useful to show the town centre boundaries in Figure 1.1 and will consider how this may be best achieved to ensure the Figure remains legible – <b>see proposed minor modification no. AAP1</b>
5	013	Greater London Authority	Policy AAP4: Achieving a high standard of development	Yes	Supported. With respect to Part A. j. of this policy (and supporting text in paragraph 4.37), the Council should include a reference to recycling.	E.g. "... <i>Make satisfactory on site provision for the disposal and storage of waste and recycling...</i> "	Yes	The Council agrees that it is useful to identify recycling as being separate to general waste in respect of requirements for storage and disposal – <b>see proposed minor modification no. AAP5</b>
5	014	Greater London Authority	Policy AAP5: Density and use of development	Yes	The intention to promote temporary uses for community benefit within dormant development sites is strongly supported in line with London Plan Policy 7.3	None	Yes	GLA support for Part F of the policy is noted.
5	015	Greater London	Policy AAP6:	Yes	With respect to taller buildings, the Council's intention to maintain a	The Council may, therefore, wish	Yes	The Council agrees that the suggested refinement of the wording of

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
		Authority	Development height, Part C/d.		sense of the prevailing building parapet height along street frontages (even where new development may exceed this) is supported.  However, officers are of the view that the use of the term "podium" in this context has the potential to cause confusion.	to refine with wording of Policy AAP6, part d, for clarity. As an example, the wording could be revised as follows: "Provide for an articulation of the prevailing parapet height of adjacent buildings, even in instances where development proposals would exceed this."		Policy AAP6(C)(d) would help to clarify the intent of the policy – <b>see proposed minor modification no. AAP7</b>
5	016	Greater London Authority	Policy AAP6: Development height	Yes	Whilst "taller", "tall" and "landmark" buildings are adequately defined in the supporting text to Policy AAP6, for ease of reference, the Council may also wish to provide concise definitions of these terms within the glossary.	Include in the Glossary the definitions for "taller", "tall" and "landmark" buildings	Yes	The Council agrees that it would be helpful to also include the definitions of "taller", "tall" and "landmark" buildings within the Glossary – <b>see proposed minor modification no. AAP35 and AAP37</b>
5	017	Greater London Authority	Policy AAP8: Enhancing the setting of Harrow Hill	Yes	Whilst the thrust of this policy is strongly supported, in line with the approach described in supporting paragraphs 4.91 and 9.92 (that a successful urban silhouette for Harrow Town centre is as much about views between buildings, as the buildings themselves), the Council may wish to replace the term "compact urban form" with "coherent urban form" in the policy and supporting text. This would help to convey the message that the Council is promoting key singular tall points to aid legibility within the town centre, rather than a singular consolidated cluster of tall buildings	Replace the term "compact urban form" with "coherent urban form" in the policy and supporting text.	Yes	The Council agrees that the suggested refinement of the wording of Policy AAP8(A)(a) would help to clarify the intent of the policy – <b>see proposed minor modification no. AAP10</b>
5	018	Greater London Authority	Policy AAP8: Enhancing setting of Harrow Hill	Yes	The inclusion of Figure 4.2, identifying protected views across the intensification area, is supported, as is the cross referencing to detailed policies within the Development Management Policies DPD with respect to protected views and vistas, and conserving heritage assets.	None	Yes	GLA support for the inclusion of Figure 4.2 and the cross referencing to the Development Management Policies DPD within Policy AAP8 is noted.
5	019	Greater London Authority	Policy AAP9: Flood risk and sustainable drainage	Yes	Broadly supported as a pragmatic approach to managing flood risk within the intensification area. The reference to sustainable urban drainage systems is supported in line with previous representations.	None	Yes	GLA support for Policy AAP 9 is noted.
5	020	Greater London Authority	Policy AAP10: Harrow & Wealdstone district energy network	Yes	This policy is supported. Paragraph 4.125 encapsulates well the heatload characteristics of the intensification area, and represents a pragmatic way to promote the development of an area-wide decentralised energy network(s) in this location.	None	Yes	GLA support for Policy AAP10 is noted
5	021	Greater London Authority	Policy AAP10: Harrow & Wealdstone district energy network	Yes	The reference to the need for biomass boilers within energy strategies to satisfy air quality standards in line with the Mayor's Air quality Strategy is supported.	None	Yes	GLA support for the inclusion of the reference in paragraph 4.127 to the need for biomass boilers within energy strategies to satisfy air quality standards in line with the Mayor's Air quality Strategy is noted.
5	022	Greater London Authority	Policy AAP11: Provision of open space, paragraph 4.137	Yes	Supported. The stated aspiration to achieve the 10 square metre per child provision of children's play space, in line with the Mayor's supplementary planning guidance, is welcomed in response to previous representations. The Council should note, however, that the Mayor has recently published draft updated supplementary planning guidance "Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation", the referencing in supporting text	Update the reference in the supporting text	Yes	GLA support for the targets for provision of children's play space is noted. The Council notes that the Mayor's SPG has been updated and agreed that the reference in paragraph 4.137 should be amended to reflect the current title of the SPG – <b>see proposed minor modification no. AAP11</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					should, therefore, be updated accordingly.			
5	023	Greater London Authority	Policy AAP11: Provision of open space, paragraph 4.146	Yes	Along with citing the Harrow Green Grid, the Council may wish to include an additional reference, within supporting paragraph 4.146, to the "All London Green Grid" supplementary planning guidance, which was published in March 2012.	Include an additional reference, within supporting paragraph 4.146, to the "All London Green Grid" supplementary planning guidance	Yes	The Council agrees that it would be useful to include a reference to the All London Green Grid SPG, to which the Harrow Green Grid seeks to implement at the borough level – <b>see proposed minor modification no. AAP12</b>
5	024	Greater London Authority	Policy AAP13: Housing within the heart of Harrow	Yes	With respect to Part C of this policy, the Council is invited to introduce further detail within the reasoned justification to express the local trends which have influenced the policy approach with respect to tenure split in Central Wealdstone.	Provide further detail within the reasoned justification to support the variation in tenure split in Central Wealdstone	Yes	The Council agrees that, to better support the variation in tenure split sought by the Policy for the Central Wealdstone sub area, further detail should be provided in the reasoned justification – <b>see proposed minor modification no. AAP13</b>
5	025	Greater London Authority	Policy AAP14: Consolidation of Wealdstone SIL	Yes	<p>The policy approach to consolidation of the Wealdstone preferred industrial location, identified as a strategic industrial location by London Plan Policy 2.17, is supported as a positive and pragmatic approach to managing change in this location following the ongoing consolidation in the operations of Kodak Ltd. at opportunity site 2.</p> <p>With respect to the detail of Policy AAP14, the requirement for robust economic analysis to justify consolidation, and the stated need to ensure accordance with London Plan Policy 2.17 is particularly supported. Given the scale of consolidation, expressed through site specific guidance within Chapter 5, and recently approved outline planning application P/3405/11, part C of this policy (which states that no further consolidation will be supported over the plan period) is supported.</p>	None	Yes	GLA support for Policy AAP14 is noted, especially in respect of Part C.
5	026	Greater London Authority	Policy AAP15: Supporting business in Wealdstone	Yes	This policy is supported as a positive and pragmatic approach to promoting the rejuvenation of local business and employment space within Wealdstone, and contributing to the renewal of the town centre.	None	Yes	GLA support for Policy AAP15 is noted.
5	027	Greater London Authority	Policy AAP16: Supporting the service sector in Harrow town centre	Yes	This policy is supported as a positive approach to promoting consolidation, reconfiguration and enhancement of office stock within Harrow town centre.	None	Yes	GLA support for Policy AAP16 is noted.
5	028	Greater London Authority	AAP17: Primary shopping areas	Yes	This policy is supported. The promotion of temporary uses to activate vacant ground floor high street units is particularly welcomed.	None	Yes	GLA support for Policy AAP17 and, in particular, Part F is noted.
5	029	Greater London Authority	AAP19: Transport, parking and access	Yes	This policy is broadly supported in line with London Plan policies 6.3, 6.9 and 6.13.	None	Yes	GLA broad support for Policy AAP19 is noted.
5	030	Greater London Authority	AAP21: Harrow Waste management site	Yes	<p>The Plan's interest in investigating intensification of the Civic Amenity site and depot sites is supported.</p> <p>Part A of this policy identifies criteria that the Council will consider a proposal for a new waste facility against. Whilst the principles within the criteria are supported, these are not exhaustive when considered against strategic criteria within London Plan Policy 5.17, part B.</p>	Revise the policy to accurately reflect the all the criteria within Policy 5.17, or an acknowledgement of/reference to the strategic criteria provided by this policy.	Yes	Any proposal for a waste management facility will require consideration against the policies of the London Plan; the West London Waste Plan DPD; the Harrow Core Strategy and the Area Action Plan. The Council considers there is potential for significant overlap, and therefore agrees that a reference to the strategic criteria of London Plan Policy 5.17 is more appropriate – <b>see proposed minor modifications no. AAP18</b>



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					Officers would, therefore, welcome the revision of the policy to accurately reflect the all the criteria within Policy 5.17, or an acknowledgement of/reference to the strategic criteria provided by this policy.			
5	031	Greater London Authority	AAP21: Harrow Waste management site	Yes	Paragraph 4.243 provides context to the potential for redevelopment of Harrow's waste management site to provide a waste treatment facility, and the need to accommodate Council depot operations which currently occupy the site.	In line with the principles of London Plan Policy 5.17, part H, the Council is advised to add a line which clarifies that whilst under certain circumstances intensification of this waste site may result in a contraction of depot land area, the maximum throughput of the Council's depot site would be maintained as a norm.	Yes	The requirement to make compensatory provision of equal throughput capacity is included in Policy 1 of the Pre-Submission draft of the West London Waste Plan as well as London Plan Policy 5.17H. However, the current depot site is not in existing waste use and therefore has a theoretical waste treatment capacity rather than an existing licensed maximum throughput. Nevertheless, the Council agrees a reference to the need to maintain the potential waste treatment capacity of the site should be included in the reasoned justification to Policy AAP21 – <b>see proposed minor modification no. AAP19</b>
5	032	Greater London Authority	Site 2: Kodak and Zoom Leisure	Yes	The GLA notes that the site specific guidance has been revised to closely reflect the approved outline planning application for this site (P/3405/11). This is supported as it reflects an evidence based, viable, proposition for employment regeneration at this site, and the consolidation of strategic industrial land, facilitated by acceptable enabling development.	None	Yes	GLA support for the revised site specific guidance for Site 2 is noted.
5	033	Greater London Authority	Site 2: Kodak and Zoom Leisure	Yes	<p>The diagram in support of site specific guidance for site 2 proposes a new, consolidated, Strategic Industrial Location (SIL) boundary. GLA officers acknowledge that there are challenges in re-drawing the boundary at this site in a way which takes account of the approved outline application, however, the inclusion of non-SIL compliant uses within this boundary (residential and retail) does not accord with the principles of London Plan Policy 2.17, and is not supported.</p> <p>Given the benchmark established at this site by the approved outline application, officers are content that this issue does not amount to a concern of non-general conformity, however, the GLA would welcome further joint engagement with the Council to discuss various options for presenting this diagram, and/or to refine the revised Wealdstone SIL boundary, before the submission stage.</p>	Further options for re-drawing the SIL boundary need to be considered.	Yes	Following further discussion with the GLA, the Council has agreed that the consolidated SIL boundary should, as far as practical, exclude non-SIL compliant uses. It should therefore be amended to include Waverley Industrial Estate and the employment areas identified on the illustrative masterplan diagram for Site 2: Kodak, which accords to the granted outline planning permission – <b>see proposed minor modification no. AAP21</b>
5	034	Greater London Authority	Site 2: Kodak and Zoom Leisure	Yes	In line with comments provided at the preferred options consultation stage, and following subsequent discussions with the Council, GLA officers will monitor the progress of the approved mixed-use redevelopment at this site, and will consider the strategic industrial designation of the Wealdstone Preferred Industrial Location accordingly, at the next review of the London Plan.	None	Yes	The Council will also monitor the progress of delivery of the approved mixed-use redevelopment of the site, and agrees that the most appropriate means by which to consider the long-term potential of the SIL designation is through the next review of the London Plan, and is happy to engage with the GLA in such discussions at that time.
5	035	Greater London Authority	Site 2: Kodak and Zoom Leisure	Yes	As discussed in representation 21 above, officers acknowledge that the site specific guidance has been brought into line with the approved planning application at the site. The supporting land uses now, therefore, include a large proportion of retail in this out of centre location. Whilst the GLA is content with the justification and mitigation embodied within the approved planning application at this site, for clarity, officers would welcome an acknowledgement in the supporting text that retail development in this location must not undermine the	Include an acknowledgement in the supporting text that retail development in this location must not undermine the vitality and viability of nearby town centres.	Yes	Not agreed. Both the Council and the GLA have stated they are content with this level of retail provision at this location, having already determined, in the course of granting outline planning permission, that this will not adversely impact on the vitality and viability of nearby town centres. To include a statement that the retail development in this location must not undermine the vitality and viability of nearby town centres would therefore be ultra vires. <b>No change</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					vitality and viability of nearby town centres.			

#### Respondent 6: Natural England

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
6	036	Natural England	Whole DPD	Yes	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Overall Natural England is satisfied with the document, it covers the areas and issues of interest to Natural England. The approach includes aspects of social, economic and environmental policies to assist in delivery of sustainable development. Delivery does not seem inappropriate subject to schemes being brought forward.</p> <p>Policies and approach also seem to be in general compliance with the London Plan and National Planning Policy Framework, again providing opportunities under environmental, social and economic headings.</p> <p>Subject to the above Natural England does not wish to offer any further substantive comments.</p>	None	Yes	The Council notes that Natural England is satisfied with the AAP and has no substantive comments it wishes to make.

#### Respondent 7: Three Rivers District Council

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
7	037	Three Rivers District Council	Whole DPD	Yes	Three Rivers District Council have no comment to make in relation to the proposed submission documents.	None	Yes	The Council notes that the District Council has no comments to make in relation to the AAP policies.

#### Respondent 8: Mrs Sheridan Maple

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
8	038	Mrs Sheridan Maple	Site 3: Teacher's Centre	N/S	<p>Why as a resident have I not been consulted properly with regards to the Whitefriars Teacher site as I live a few minutes walk from this site. Have the council not looked at the traffic congestion this is going to cause to us as a resident. Also valuable outside space will be taken from us. Also we are surrounded by schools we do not need another one in this area. We are already suffering with gangs and all the trouble this brings. The place is dirty from rubbish that is dropped by all the children that use the surrounding areas. The traffic especially in the morning and early evening is particularly heavy as people use Cecil Rd , Tudor Rd , Toorack Rd , Athelstone Rd , Cypress Rd , Whitefriars as a cut through from Headstone dr to get to Harrow Weald. We are also get a lot of traffic from the Mosque in Whitefriars. The Mosque users park anywhere they can this goes on day and</p>	Suggests respondent seeks the removal of the allocation of the site for D2 Education use. NB: no alternative use is offered by the respondent, so suggests the respondent wishes to see the site remain unallocated.	N/S	<p>Consultation on the proposals for the emerging Area Action Plan was advertised and undertaken widely (see Section 2 of this Consultation Statement and that published on the website in respect of consultation on the Issues and Options document and the Preferred Options document:  <a href="http://www.harrow.gov.uk/downloads/file/11354/aap_reg_25_2012_representations">http://www.harrow.gov.uk/downloads/file/11354/aap_reg_25_2012_representations</a>  The need for a new secondary school is identified in the Council's Infrastructure Assessment and Delivery Plan  <a href="http://www.harrow.gov.uk/downloads/file/10168/infrastructure_assessment_and_delivery_plan">http://www.harrow.gov.uk/downloads/file/10168/infrastructure_assessment_and_delivery_plan</a>  The site has a long history of education use, and therefore remains the Council's preferred option for a new secondary school, serving</p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					night but especially from early evening. Your parking restrictions are not working as you were told mosque times are from 12 to 2 your restriction are from 10 to 11 then 2 to 3. Completely useless. Have you not thought that the Col Art site would be much better to use as a school as you have the main road High Rd to take the traffic away from residential areas a much better use of space. The people of this area have suffered enough of changes especially when the council does not listen.			both the new Intensification Area as well as the wider borough. Further changes have been made to extend the boundary of site to take in the builder's yard on Cecil Road, the Whitefriars Industrial Estate and Aerospace House. The designation will provide for continued industrial use of these sites as well as for further education use, enabling the consideration of a much larger parcel of land to provide further options to accommodate a new school more comfortably on the site. It will also enable wider options to be considered to mitigate the traffic impacts arising from any school proposal. While TfL have modelled these impacts, the mitigation will need to respond to the final school proposal for the site, and being a free school, this remains unknown at this time. Further consultation with the community will therefore need to take place prior to application coming forward for a new school on the site. The Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. There is to be no net loss in the provision of open space on the site in accordance with Core Policy CS1F. These requirements are specified in the AAP. The ColArt site was considered and is being proposed for the expansion of the Salvatorian College, but the cost of acquiring the remainder of the site for a new school was deemed prohibitive. With respect to matters of rubbish and parking enforcement associated with use of the Mosque, these are matters outside the scope of the AAP. <b>No change</b>

N/S – Not Specified

#### Respondent 9: Irene wears on behalf of Campaign for a Better Harrow Environment

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
9	039	Irene Wears on behalf of Campaign for a Better Harrow Environment	General comment	Yes	Whilst we understand the need to keep the documents to a manageable size, it is unfortunate that most of the maps/diagrams are very difficult to use because they are so small. The problem is made worse by the use of a tiny font which is often superimposed on coloured or patterned backgrounds. The map on page 156 of the AAP is just one example of this. Not everyone is able to view the documents on line and, in so doing, to enlarge the images.	Maps and Diagrams should be larger	N/S	The Council does try and ensure all maps and diagrams are legible whilst trying also to keep the document to a reasonable size, both for publishing in hard and on-line versions. At draft stages the quality of the images is limited by the internal graphics expertise by our publishing software. The cost involved in getting professional publishing expertise makes this prohibitive at draft stages. However, as set out in the Statement of Community Involvement, if people do have problems viewing the images or text, the Council can make larger print copies of the document or specific images available upon request. <b>No change</b>
9	040	Irene Wears on behalf of Campaign for a Better Harrow Environment	General comment	Yes	In Appendix C of the AAP document (Making Representations), one purpose of the examination is said to be to consider whether the DPD is "sound". Soundness is discussed on page 211 where it is stated that the plan should be consistent with achieving sustainable development and that "the DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved". The Bruntland definition of sustainable development, which, we understand is still being used as the standard, is considered by professionals to be far too woolly. There are no numbers, only warm words. Defra is currently running a consultation seeking comments on	None	N/S	The comments regarding Defra's consultation on new national indicators for sustainable development are noted. In the context of Harrow's local plan, the spatial strategy set out in the Core Strategy broadly defines what constitutes sustainable development in the borough, and was the subject a detailed sustainability appraisal, taking account of the likely social, environmental and economic impacts of the plans objectives and all reasonable alternatives considered. The AAP gives effect to the spatial strategy and has also be subject to the same rigour of sustainability appraisal.

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					a new set of indicators i.e. statistics on various aspects for Sustainable Development in Government. The nine headline indicators and 25 supplementary indicators are grouped under economy, society and environment. It is to be hoped that a more rigorous set of indicators will be set up to replace the inadequate Bruntland definition and that they will be used wisely in formulating policy.			
9	041	Irene Wears on behalf of Campaign for a Better Harrow Environment	Paragraph 2.27 – 2.29	Yes	We note with approval the following new material in the Area Action Plan:  a) the new section on Urban Character and Infrastructure paras (2.27-2.29) which recognises the challenge in managing the relationship between the borough's "historic assets and new high quality, contemporary development within the Heart of Harrow	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
9	042	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP1: Development within Harrow Town Centre, Part H and paragraph 4.3	Yes	We note with approval the following new material in the Area Action Plan:  b) the material on the re-establishment of a network of walkways through sites (policy AAP1 h.)  d) the new material on building design (para 4.3, first indent) is reassuring. A number of issues will need to be addressed, including the use of non-reflective glass, especially for taller buildings, to reduce reflected glare.	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
9	043	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP6: Development Height	Yes	We note with approval the following new material in the Area Action Plan:  c) the more rigorous criteria and clearer definitions now set down in policy AAP6. We hope that this will ensure that any tall development proposed for the centre of Harrow will be of the highest quality. We also note the guidance on height given for individual allocated sites.	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
9	044	Irene Wears on behalf of Campaign for a Better Harrow Environment	Paragraph 2.40	Yes	On para 2.40 (Station Road), we welcome the adoption of a boulevard concept for this key artery. For traffic management purposes it would be worth looking at Ilford lane between Ilford and Barking, a major corridor between two town centres. There have been radical enhancements in pedestrian, cycle and bus circulation achieved by re-design of the highway layout, allowing efficient, rapid-transit style bus operations whilst retaining access and parking for shops and other frontages.	None	N/S	It is always useful to know of examples where transformation / public realm works have been undertaken that members of the community considers represents good design that could be applicable to a Harrow situation. The Council will take up the suggestion of the Campaign for a Better Harrow Environment to visit the Ilford Lane to see an example of how Station Road may be successfully re-designed.
9	045	Irene Wears on behalf of Campaign for a Better Harrow Environment	Paragraph 3.14	Yes	Para 3.14 refers to Wealdstone as a focus for growth as well as regeneration and refers to the objective of creating "an east-west link across the area, improving connections between Headstone Manor, Kodak, the District Centre and the Leisure centre". Much as we welcome this, we question the feasibility of the dramatic improvement required, including a new crossing of the West Coast Main Line railway (even if only for pedestrians and cyclists). We feel there is a risk of this becoming an unachievable aspiration, as the severance caused by the railway line will seriously inhibit the success of the Land Securities development of the Kodak site. This will create greater pressure on the exiting road network to the west including the Headstone Drive/ Harrow View junction mentioned above.	None	N/S	The AAP retains the proposal for bridge/underpass providing a new pedestrian and cycle connection across the railway line to connect the Kodak site with the proposal for a new secondary school on the Teachers Centre site. While evidence show that delivery of this enhanced connection is not currently viable as part of the Kodak development, the Council considers the potential for possible delivery should be retained should this prove viable at some time in the future. It should be noted that the transport impacts associated with the Kodak development have been assessed in detail in the course of the grant of the outline planning permission and there is no evidence to suggest that the absence of this additional connection across the railway line will seriously inhibit the success of the Kodak re-development or result in greater pressure on the existing road network, than that already identified in Kodak's transport



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
								assessment and mitigated against through the s106 agreement, including enhancements to the existing underpass, site access arrangements, and the Headstone Drive / Harrow View Junction. <b>No change</b>
9	046	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP19: Transport, Parking and Access within the Heart of Harrow, Part H	Yes	The policies listed at AAP19 on transport access and parking within the Heart of Harrow are acceptable, but the car club recommendations should go further by encouraging rather than merely supporting car club parking schemes and spaces for car club vehicles. Where appropriate these should receive priority over other parking needs with the exception of spaces for disabled drivers.	The car club recommendations should go further by encouraging rather than merely supporting car club parking schemes and spaces for car club vehicles. Where appropriate these should receive priority over other parking needs with the exception of spaces for disabled drivers.	N/S	The Council agrees that the Policy can be strengthened as suggested – <b>see proposed minor modification no. AAP16</b>
9	047	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP20: Harrow & Wealdstone Green Travel Plan	Yes	The laudable aims of the green travel plan policy at AAP20 need to be strengthened by provision for more effective monitoring and delivery, with follow-up action taken by the Council where developers either fail to implement, or abandon, green travel plans once a development has been completed. Continuous development should be the aim, rather than one-off plans designed only to secure approval of planning applications.	Include requirement for more effective monitoring and delivery of travel plans, including follow-up actions by the Council.	N/S	The requirements for monitoring the implementation of a Travel Plan are included in the Travel Plan itself, which has to be agreed with the Council. Standard requirements include the production of an annual monitoring report to be submitted to the Council for review. On grant of planning permission the delivery of the Travel Plan is included in the legal agreement, and is therefore binding upon the land and future owners, and any breaches in compliance with the requirements of the Travel Plan are therefore enforceable through legal means. In preference to including the above within the reasoned justification to Policy AAP20, the Council considers it appropriate to include a reference to the fact that implementation and enforcement of the agreed Travel Plan is to be secured through the legal agreement – <b>see proposed minor modification no. AAP17</b>
9	048	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP21: Harrow Waste Management Site	Yes	On the Harrow Waste Management Site policy AAP21, the traffic generation criteria (sub paragraph h) should ideally include use of rail transport to remove waste, given the proximity of the site to the West Coast Main Line. It is a pity that the trackbed of the former Stanmore branch line, over which the facility was built, was not safeguarded many years ago to retain rail access to the site.	Include use of rail to transport waste from the site.	N/S	In the course of preparing the West London Waste Plan discussions have taken place with Network Rail, who own and manage Britain's rail infrastructure, about the ability to provide a railhead facility to service this and other waste sites. However, Network Rail advised that they do not support proposals for a railhead that would be accessed directly from the mainline due to operational capacity and safety concerns. <b>No change</b>
9	049	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP5: Density and Use of Development	Yes	<b>Housing</b> - We note with approval that:  a) on housing, references in the previous draft to a possible trade-off between amenity and privacy in some cases and exceeding London Plan densities in others, as shown in the earlier draft have now been removed	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
9	050	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP11: Provision of Open Space	Yes	<b>Housing</b> - We note with approval that:  b) Policy AAP11 now stipulates that all residential developments should provide green space for private or shared use by occupants.	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
9	051	Irene Wears on behalf of Campaign for a Better Harrow Environment	Chapter 5 – table of Outputs Across the Sub Areas	Yes	<b>Housing</b> - At page 172 there is an error in the total of homes for Harrow Town Centre East; it should be 637, which brings the total for the Intensification Area to 3408. This is almost 25% above the minimum of 2800 set out in the Core Strategy objectives. We understand that at this early stage, it is impossible to be precise as some sites may not be developed and other new sites may become	Amend error in the table and provide an explicit statement that the housing target for the Intensification Area is 2,800 as set out in the Core Strategy.	N/S	The Council agrees that the figure in the table should match that provided in the section on target outputs for this sub area at page 165 – <b>see proposed minor modification no. AAP33</b>  The NPPF, London Plan and Harrow Core Strategy all clearly state that housing targets are expressed as minimums. While sites are

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					available. However a "broad quantum" figure which exceeds the minimum by 25% is a matter for concern to us. Harrow which is one of the more densely populated outer London boroughs and one which was already exceeding its housing target pre-Core Strategy. The Core Strategy target of 2800 new homes in the Intensification Area should be made explicit. The purpose of the list of 3408 potential dwellings is surely to show that the Core Strategy target is achievable even if all sites are not developed to their maximum potential.			allocated on the basis that they are likely to become available for redevelopment over the plan period, past experience shows that this is not always the case. The implications of having a minimum housing target, and past allocated sites not being developed out, means that the Council must allocate sufficient sites to comfortably exceed the target requirement. In doing so, this allows the Council to better monitor and manage housing delivery, and conversely, to resist proposals for inappropriate development (i.e. development not in accordance with the Local Plan). <b>No change</b>
9	052	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP4: Achieving a High Standard of Development throughout the Heart of Harrow	Yes	<b>Housing</b> - We are pleased to note the many references to plans for high quality development in the Intensification Area. However for housing developments it will be important to ensure that the impact of attractive, well designed buildings is not spoiled by the use of balcony areas for storage, drying washing etc as is already happening at the Neptune Point development. Such practices are unlikely to attract the young, professional home buyers that are sought.	Control the use of balcony areas for storage, drying washing etc.	N/S	Such matters are for the management company / body corporation of the building / site to require and enforce. <b>No change</b>
9	053	Irene Wears on behalf of Campaign for a Better Harrow Environment	Whole DPD	Yes	<b>Town centre cultural/leisure facilities</b> - As before the Plan is peppered with general references to public space/realm, active ground floor uses, mixed uses, and leisure/cultural/entertainment activities. The only firm statement relates to the proposed siting of the new Central library in College Road. We believe that the Plan should state what facilities it is intended to provide and (provisionally) where they would be located.	The Plan should state what facilities it is intended to provide and (provisionally) where they would be located.	N/S	The facilities / infrastructure intended to be provided through the AAP are set out in the Infrastructure Schedule on page 178, which also sets out the site or sub area within which each is to be located. Within Chapter 5, each sub area has a heading 'Infrastructure' which reiterate these requirements and the relevant site allocations include references to these facilities either in the land use description or in the site specific infrastructure. <b>No change</b>
9	054	Irene Wears on behalf of Campaign for a Better Harrow Environment	Whole DPD	Yes	<b>Town centre cultural/leisure facilities</b> - The effects of the recession which shows no sign of improving in the short to medium term, coupled with changing shopping patterns mean that we are probably destined to lose more of the most vulnerable town centre retailers. The plan acknowledges all of this, along with the Portas Review whose recommendations include community use of empty properties (see page 187). The Council is prepared to try this and it may work to some extent. However we still need to do much more to make Harrow an attractive and vibrant place to live/visit. Only then can we expect the key retailers to stay in Harrow so that residents spend their leisure time here and more visitors are attracted to the town. So along with restaurants and hotels etc, we need more things to attract people to the town centre. The careful identification and planning of this is central to the renewal of the town and its continued status as one of London's Metropolitan Centres. It should not be left to chance.  Features like a good town market and extras like an open air roller skating rink with seasonal ice skating and Christmas stalls would bring people into the town centre. The plan to have a performance area in Lowlands Recreation ground is noted but that is slightly off the shoppers' route and is obviously a fair weather venue. Ideally we need a town centre indoor performance space. An exhibition space would also be very valuable. Harrow has innumerable artists and craftsmen ready to display their skills and their wares. And local archaeological, astronomy, geological and historical societies could provide interesting exhibitions.  Understandably envious eyes are being cast towards modern retail centres like Ealing and Uxbridge. However changing shopping habits coupled with the effects of the recession mean that the future of such	Need to identify and plan for more things to attract people to the town centre.	N/S	AAP7 is about creating a quality new public realm within the town centre. Part D of the policy requires that this be designed carefully to accommodate and strengthen pedestrian and cycle links but also to enhance social use of such space, ensuring it is flexible in its function. In particular, as set out in Part B, there are a number of key new public spaces that are to be created or enhanced including the Junction Road underpass, the square at St John and Lyon roads, St Ann's Road, as well as on the development sites for 17-51 College Road (site 18) and the Greenhill way car park (site 13). Careful design will enable these spaces to be used for a variety of activities including markets, stalls, and potentially ice skating etc. The provision of new civic space at 17-51 College Road (site 18) and Greenhill way car park (site 13), will complement proposals for community facilities on these sites which, again, if designed well could incorporate uses that could make use of both in-door and out-door spaces. However, it is outside the scope of the AAP to prescribe the activities that should take place within these newly created spaces. Such decisions are a management matter. Rather the role and function of the AAP is to ensure such spaces are created and designed to allow a range of activities to take place. The Council considers the above provisions set out in the AAP achieve this. With regard to ensuring the built form of the town centre remains flexible to respond to changing trends, Policy AAP1 ensures new development within the town centre provides for a mix of town centre uses; active ground floor uses; and buildings are adaptable at ground and first floor building forms to respond to changing retail / town centre trends. Further, Policy AAP17 sets thresholds for non-retail use at street level in the primary shopping frontage but also provides for an exception to these where it can be demonstrated that

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					places must be uncertain. Harrow has a unique opportunity at this time to take the lead in creating a town centre that reflects the changing trends.			the proposal will make a significant contribution to the vitality and viability of the town centre. <b>No change</b>
9	055	Irene Wears on behalf of Campaign for a Better Harrow Environment	Sub area: Harrow Town Centre West	Yes	<b>Harrow Town Centre West</b> - We welcome the change of name for this sub-area and the adjustment to the boundary which should safeguard the southern edge of the Harrow Recreation Ground. We note that the land to the west of Neptune Point, between the railway and Pinner Road, is not mentioned as a key site. It is a large site, including housing as well as warehouses and if there are plans for its development they should be stated. Any new developments will need very sensitive transitional elements to blend into surrounding residential areas.	If there are plans for redevelopment of land to the west of Opportunity Site 14, the AAP should allocate and specify what is proposed for this area.	N/S	The land to the west of the new Neptune Point development was included within the Intensification Area boundary because it is a large site bordering the town centre boundary. However, it was not allocated as a potential development site within the AAP because the site continues to provide suitable industrial accommodation. <b>No change</b>
9	056	Irene Wears on behalf of Campaign for a Better Harrow Environment	Site 18: 17 - 51 College Road	Yes	<b>Harrow Town Centre Central</b> - With respect to site 18 (17-51 College Road) we acknowledge that this is potentially a larger site than previously considered and should therefore offer opportunities for more mixed uses and more coherent public realm. However we note too that site constraints may affect the eventual design and layout. We will not therefore comment further at this point. Instead, we look forward to seeing the developer's proposals in due course and we shall comment at that stage.	None	N/S	Noted
9	057	Irene Wears on behalf of Campaign for a Better Harrow Environment	Site 18: 17 - 51 College Road	Yes	<b>Harrow Town Centre Central</b> - One aspect that does concern us at this stage is the acceptance of a 19 storey building in principle on this site, so close to Harrow Hill. We acknowledge that this was the opinion of the Planning Inspector at the previous appeal and that this opinion was accepted at the Examination-in-Public of the Core Strategy. However since then new evidence has emerged which we feel offers a strong argument against a building of such height. According to the independent assessment of protected views (2012), site 18 lies in the yellow consultation zone of 3 viewpoints, Grove Open Space, Old Redding and the Roxborough footbridge, and within the red viewing corridor of a fourth, Wood Farm. Surely such convergence of views should be taken account of. Furthermore the London Plan Management Framework states that development that exceeds the threshold in the red viewing corridor 'is likely to harm the viewer's ability to recognise and appreciate the landmark'. Policy 3 (chapter 2) of the Development Management Policies DPD reflects this, stating that 'development should not exceed the threshold height of a landmark viewing corridor (shown in red)'. While the opinions of Planning Inspectors are obviously important, in this instance it places the Council in the difficult position of having to ignore their own evidence base. We therefore feel that this issue should be re-examined.	Re-examine the issue of the acceptance in principle of an up to 19 storey building on Opportunity Site 18: 17- 51 College Road.	N/S	The fact that the Council has undertaken a new Views Assessment does not overcome the material acceptance in principle of a tall building of up to 19 storeys on Site 18: 17 – 51 College Road. A key tenet of the planning system remains that planning applications be determined in accordance with the policies of the local plan, unless material considerations indicate otherwise. As an evidence base, the Views Assessment is not concerned with individual sites, rather it is a borough-wide study undertaken to inform the View Management policies of the Development Management Policies DPD and the Area Action Plan. As such, it cannot be used to make irrelevant any matter which is a material consideration in a particular case. <b>No change</b>
9	058	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP16: Supporting the Service Sector in Harrow Town Centre	Yes	<b>Town centre office blocks</b> - At para 4.199 the Plan refers to the evidence of the 2010 Harrow Employment Land Study which studied 28 office and industrial locations across the borough. In Harrow town centre, 76-132 College Road and the Lyon/Equitable House sites were investigated. There are of course also now unoccupied buildings farther down College Road which have the benefit of being rather more modern. The Study suggests that there may still be a future as offices for some of the more modern blocks, subject to improvements in town centre facilities and more generous parking ratios. The Study urges the Council, "to adopt a plan, monitor and manage approach" in the light of the universal economic uncertainties and the inevitably fluid situation in Harrow arising from the implementation of the Area Action Plan.	None	N/S	As set out in the Employment Land Study, the age of the majority of the office stock in Harrow town centre, and the high vacancy levels currently being experienced, mean that the rent levels being achieved are low – too low to drive investment in new build office development. The study also notes that current and projected trends for Harrow are not for large format offices for single private or public sector occupiers – rather the local office market is for more flexible smaller scale space but with access to good amenities and services. It is therefore crucial that the AAP address the levels of office vacancy and seek to renew and revitalise Harrow's office market. The Council considers the only approach to delivering such change is to allow these large vacant office buildings to come forward for mixed use redevelopment but on the basis that the

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					This is an obvious and important strategy. However, from Policy AAP 16 and the Reasoned Justification that follows, it is not at all clear to us that the Council is developing such a strategy. We do not underestimate the difficulties involved, but nonetheless we think this is vital. On the one hand, a revitalised office sector could prove invaluable to the future prosperity of the town centre. On the other, if this shows no signs of materialising, then changes of use would be an important part of Sustainable Development.			scheme includes re-provision of a portion of the existing office floorspace. The result is the provision of a new build office tailored to meet local needs and an overall reduction in the level of vacant office floorspace which, once it gets down to 10% (i.e. what the market considers to be normal churn) should begin to impact positively on office viability, and if the demand is there, as the Employment Land Review suggests it will be, then this will drive a new office market in the town centre. Nevertheless, the Council will continue to monitor the situation with regard to Harrow office market and the impacts of the policy and the AAP and will, if necessary, amend the approach should the policy not be effective in delivering the outcomes sought – see Core Strategy monitoring indicators TCR8 – TCR11. <b>No change</b>
9	059	Irene Wears on behalf of Campaign for a Better Harrow Environment	General comment	Yes	<b>Protection for existing residents</b> - We note that the Plan recognises the need for a transitional boundary between town centre development and neighbouring residential areas in Harrow Town Centre East (Key sub area objective 1). It nowhere states how this might be achieved. We suggest that this is something which will need to be built into the planning applications for large developments here and elsewhere in order to minimise the effects on quality of life due to increased noise, traffic congestion, loss of privacy, loss of sunlight etc. Site 23 (Gayton Road) is an example of a development area that could have a deleterious effects on properties in Ashburnham Avenue.	None	N/S	The Council agrees that this is best addressed through the case by case consideration of a planning applications as the appropriate transitional arrangements are likely to differ significantly between sites and proposals, and will depend on the site circumstances, the neighbouring site(s) context and the proposal, including scale, mass, layout etc. The Council considers the policies of the AAP to be comprehensive, and thereby enable the consideration of such matters in respect of transitional boundary issues. <b>No change</b>
9	060	Irene Wears on behalf of Campaign for a Better Harrow Environment	General comment	Yes	<b>Protection for existing residents</b> - In addition, it is the case that large parts of the Intensification Area are set to become building sites for long periods over the next 12-15 years. As new developments are being built and brought on stream, there will be knock-on effects on footways, roads, bus routes etc. The whole regeneration process needs to be managed sensitively for the sake of the people who use Harrow, particularly those who live there. This fact is not recognised in the Plan. We suggest that there should be an information campaign covering each major site as it starts to be developed. This could comprise road signs that apologise for inconvenience/explain what is happening; information at the sites and on local advertising hoardings to show progress and the finished product; illustrated articles in local newspapers; scale models on line and on show in local places so that people can see what is going on.	None	N/S	The Council expects the impacts of the construction of a new development to be contained within the curtilage of the development site and potential nuisance mitigated. The Council operates a Considerate Contractor Scheme, whereby contractors are encouraged to follow a Code of Practice to minimise nuisance during construction. Where construction activities impact or affect footways, roads, bus routes etc these are addressed under the Highways Act.  However, the Council agrees that the AAP should say more on the project management of the implementation of the AAP. Beyond the consideration of individual site proposals, and the management of these through the planning application process, the Council recognises there is a need to acknowledge that the AAP represents circa £1b in development and investment in the Heart of Harrow over a 15 year period, and therefore requires the Council to take responsibility for overseeing and managing the Plan's implementation and delivery across the area as a whole. The Council is in the process of developing an inward investment and marketing strategy – both to advertise the investment and development opportunities within the Heart of Harrow to commercial interests outside of the Borough and to communicate the delivery of the AAP. Its purpose will be to highlight the progress being made, recent successes, individual site marketing material, including illustrations and models; statistics, and to advertise events and key topics of interest. Two examples the Council are following are Opportunity Enfield: <a href="http://www.opportunityenfield.com">http://www.opportunityenfield.com</a> and Invest Ilford <a href="http://www.investilford.co.uk/home.aspx">http://www.investilford.co.uk/home.aspx</a> ) - <b>see proposed minor modification no. AAP34</b>

N/S – Not Specified

Respondent 10: CBRE on behalf of Dandara Ltd



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
10	061	CBRE on behalf of Dandara Ltd	Chapter 2	N/S	<p>This Chapter provides a general overview of the current situation across the AAP area and the Intensification Area identified within the London Plan 2011 and the broad strategy going forward. Paragraph 2.45 identifies the specific challenges of the town centre and identifies some of the key requirements that will be necessary to achieve the uplift sought. However, these are relatively small piecemeal responses to what is a broader underlying challenge and nowhere does the Chapter identify a specific role for the Council in delivering improvements beyond the policies of the AAP itself.</p> <p>Achieving the objectives and potential for the AAP as set out in the policy framework will require the Council to take a proactive approach and it must take on a leadership responsibility driving forward the policies and objectives of the plan recognising that, at times, it will need to be robust in its decision making and arguably make unpopular or controversial decisions.</p>	Our client believes that the Council needs to explicitly state and should commit itself, within the Plan to <i>"...take a robust and bold leadership role in bringing the Town Centre forward if its potential is to be realised and if it is to maintain its role, function and attract inward investment"</i> .	N/S	<p>The responsibilities of the Council in project managing the implementation of the AAP are to be included in a proposed minor modification to Chapter 6: Delivery, Implementation and Monitoring – <b>see proposed minor modification no. AAP34</b></p> <p>However, the Council queries why the respondent considers it probable that the Council will need to make unpopular or controversial decisions? The Council would argue that such hard decisions have been addressed in the course of preparing the AAP, and that, in approving the Pre-submission document for consultation and submission to the Secretary of State, the Council has confirmed its commitment to the growth and development of the Heart of Harrow in the form prescribed therein. In doing so, the Council has embraced the plan-led system, and will welcome and support applications that accord with the Core Strategy and the AAP, and that help to deliver the spatial vision and strategic objectives for the Heart of Harrow.</p> <p><b>No change</b></p>
10	062	CBRE on behalf of Dandara Ltd	Policy AAP1: Development within Harrow Town Centre	N/S	<p>This policy sets out the broad Character and Amenity criteria for promoting development within Harrow town centre. This policy fails to acknowledge Core Strategy Policy CS2 J or CS Paragraph 5.15 in respect of the fact that the town centre is the location to identify sites for taller and landmark buildings. Whilst it is accepted that there is later policy within the AAP dealing with development height the same is also true in respect of the other factors identified in this policy. Our client considers that within this policy and/or the supporting text it should be recognised that the principle of a tall building at College Road, up to 19-storeys in height and projecting above Harrow Weald Ridge, has been accepted by the Secretary of State. This is necessary to be consistent with the CS and also the comments made by the Inspector at the CS EiP.</p>	Within the policy and/or the supporting text it should be recognised that the principle of a tall building at College Road, up to 19-storeys in height and projecting above Harrow Weald Ridge, has been accepted by the Secretary of State.	N/S	<p>The Council disagrees and considers such change unnecessary on the following grounds: Policy CS2J applies to the whole of the Intensification Area, not just to the sub areas of Harrow Town Centre; The AAP gives effect to the Core Strategy but need not repeat these higher order policies; The policies of Chapter 4 of the AAP are not intended to be site specific – reference to 51 College Road within Policy AAP1 would be a departure from this intended approach; Lastly, the principle of a tall building at College Road, up to 19-storeys in height, is appropriately recognised in the AAP at Chapter 5: Sub Area and Site Specific Guidance for Site 18: 17 to 51 College Road.</p> <p><b>No change</b></p>
10	063	CBRE on behalf of Dandara Ltd	Policy AAP6: Development Height	No	<p>Policy AAP6: Development Height – In the context of their site at 51 College Road, our client objects generally to the content of this policy. Whilst reference to the site parameters in Chapter 5 for development sites is welcomed, they have particular concerns regarding the requirements of the remaining sub-sections not least as, being policy, greater weight would be attached to these than to the site specific parameters where a conflict between them occurred. The policy fails to recognise that the Secretary of State has already established that the principle of a tall building on the site of 51 College Road and that a tall building specifically on that site may project above the Weald Ridge. The acceptability of a tall building at 51 College Road is explicitly referenced within Paragraph 5.15 of the Core Strategy, and whilst the parameters in Chapter 5 do reflect this, it is not reflected in the Policy framework per-se. The Policy framework of the APP is therefore fundamentally inconsistent with the adopted Core Strategy. Moreover the CS specifically states that the Intensification Area is suitable for locating (at least one) tall building yet this is not reflected in the specific policy framework. The issue of the SoS's Decision was a discussion matter in the CS EiP and the Inspector there was of the view that it was appropriate in the CS to acknowledge specifically the decision at College Road. Subsequently the CS was revised and adopted on this basis and this therefore needs to be picked up under the AAP policy framework to be both consistent and sound.</p>	To be consistent with the Core Strategy, the AAP policy framework should specifically acknowledge that site at 51 College Road as being suitable for a tall building.	N/S	<p>Policy AAP6 applies to the whole of the Heart of Harrow and, in accordance with the Core Strategy (Policy CS2J), makes specific provision for tall, landmark buildings within the Intensification Area. As stated previously, the policies of the AAP are not intended to be site specific, such detail, for allocated sites, is appropriately left to the Sub Area and Site Specific Guidance set out in Chapter 5. In respect of 51 College Road, the material consideration (i.e. the appeal decision and the acceptance in principal of a tall building up to 19 storeys on this site) is included in the Site Specific Guidance for Site 18. The Council is therefore satisfied that there is no conflict between Policy AAP6: Development Height and site allocation 18: 17-51 College Road, and that the AAP is consistent with the Harrow Core Strategy.</p> <p><b>No change</b></p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
10	064	CBRE on behalf of Dandara Ltd	Policy AAP6: Development Height	No	<p>Further, we would reiterate our concerns from the representations submitted in February regarding the Views Assessment carried out, but untested through consultation/analysis, that forms part of the LDF evidence base. This has now manifested itself into the Development Management Policies DPD (see separate representation) and is explicitly referenced under E of Policy AAP6 as a test of acceptability for tall buildings. That Views Assessment continues to contradict the SoS's decision and the general approach to the policy framework fails to recognise the evidence and technical analysis that was undertaken for the appeal, robustly tested and analysed and which was accepted in his decision. Again, this is fundamentally inconsistent with the adopted Core Strategy which references the acceptability in principle of a tall building at 51 College Road. Furthermore, the Views Assessment and its current reference within both the AAP and DMP DPD have fundamental impacts on the provision of taller buildings generally within the AAP which raises questions over the ability of the AAP to deliver its target outputs. Given all of the above, our client considers that both the AAP and DMP DPD are unsound in respect to this issue.</p> <p>These comments on the issue of tall buildings, particularly in respect to the 51 College Road site are relevant throughout the AAP DPD where mention to views and vistas occurs.</p>	N/S	N/S	<p>The Views Assessment was commissioned to address the failings of the designated UDP local views as identified through the appeal hearing for 51 College Road. The draft Views Assessment was published alongside the AAP Preferred Option for consultation. The respondent, alongside others, made representations to the draft Views Assessment, which was subsequently amended to take account of these comments before being finalised. The comments received to the draft Views Assessment, and Council's response to these, is included in the Consultation Statement for the Regulation 18 stages of the AAP, available on the Council's website: <a href="http://www.harrow.gov.uk/downloads/file/12286/consultation_statement_for_the_area_action_plan">http://www.harrow.gov.uk/downloads/file/12286/consultation_statement_for_the_area_action_plan</a></p> <p>The Council is satisfied that the findings of the Views Assessment are robust having been carried out by an appropriately qualified professional consultant, undertaken in accordance with the London Views Management Framework methodology; and having been the subject of public consultation and revised accordingly.</p> <p>With regard to Site 18: 17-51 College Road, the Views Assessment shows that the site lies in the yellow consultation zone of three viewpoints: Grove Open Space, Old Redding and the Roxborough footbridge; and is within the red viewing corridor of a fourth, Wood Farm. View cones, by their nature, can overlay hundreds of properties, as the above views all do. Therefore, the Council does not consider it appropriate or necessary to exclude valid local views, robustly justified as being worthy of protection, on the basis of a material consideration affecting just one property, especially where the exact location of the proposed tall building within the site remains unknown and subject to planning and detail design considerations. The Council maintains that it is justified, on the basis of the robust evidence, to include these views within the AAP and Development Management Policies DPD, but to have regard to the material consideration (i.e. the appeal decision and the acceptance in principal of a tall building up to 19 storeys on this site) for Site 18 within the Site Specific Guidance. The Council is therefore satisfied that there is no conflict between the findings of the Views Assessment, the policies of the AAP and site allocation for Site 18: 17-51 College Road.</p> <p><b>No change</b></p>
10	065	CBRE on behalf of Dandara Ltd	Paragraph 4.70	No	<p>Para 4.70 – This paragraph introduces the premise that taller and tall landmark buildings are encouraged to provide viewing galleries and platforms. Again our client would reiterate their objection to any such provisions that was contained in their February 2012 submission. It is considered commercially unrealistic and generates numerous health, safety, security, management and service charge costs on a scheme once complete., The practicalities are therefore that the level of demand and interest is likely to be low and would be outweighed against the costs of maintaining such facilities. Those costs would need to be recovered through service charges as any potential income for allowing access could not be guaranteed, and this would have to be shared across all tenants and residents, including affordable units, increasing significantly the service charge imposed on that sector. Additionally, unlike the buildings in central London, there is not the equivalent catchment population on which to draw and sites where this requirement would apply would not attract or be suitable for the bar/restaurant or similar uses to underpin any access. Additionally, in the context of the architectural style that the AAP DPD seeks to define for tall/taller buildings, there is not the scale or mass</p>	Remove reference in paragraph 4.70 to the premise that taller and tall landmark buildings are encouraged to provide viewing galleries and platforms	N/S	<p>Policy AAP6E states that, in addition to the criteria listed therein, proposals for tall buildings will be considered in accordance with the criteria of the London Plan. London Plan Policy 7.7C, criteria (h), states that tall buildings should, amongst other things, "<i>incorporate publicly accessible areas on the upper floors, where appropriate</i>". Having regard to the criteria of the London Plan, paragraph 4.70 of the AAP seeks to highlight the outstanding views over London that can be achieved within the Heart of Harrow, and the fact that proposals for taller and tall landmark buildings within the Heart of Harrow provide an appropriate opportunity for the public to enjoy such views. However, the Council accepts that the wording of paragraph 4.70 is not wholly consistent with the London Plan and therefore considers it appropriate to amend the paragraph to better reflect criteria (h) of the London Plan Policy 7.7 – <b>see proposed minor modification no. AAP9</b></p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					in which to accommodate segregated lift cores etc which, amongst many other things, presents a security issue for residential occupiers. The increased demands that there would be and the need to accommodate equal access requirements all undermines viability further. Indeed, we would advocate that a building with a residential component that cannot be segregated is unsuitable for public access and for hosting viewing platforms/galleries. Buildings that accommodate such facilities, have separate lift cores and are predominantly in commercial use. It should also be noted that viewing access is encouraged within tall and taller buildings, which by the Core Strategy definition is anything over 30m equivalent to 10 storeys.			
10	066	CBRE on behalf of Dandara Ltd	Policy AAP22: Supporting Site Assembly	N/S	Our client supports the Council's stated commitment to use CPO powers where this is appropriate. This explicit statement underpins the robust leadership role they believe the Council should adopt and which has been referred to earlier. However, developers should not be expected nor required by the Council to design or develop beyond their boundaries if they are not willing to do so. There are many reasons why this may be the case, from financial to the implications of delay, and the costs involved. Developments should not be stifled by a desire of the Council to push boundaries and piecemeal development of a larger site might be more beneficial to delaying development coming forward particularly given that the Council will expect the developer to bear all of the cost requirements. It should also be recognised that the use of CPO powers is timely and not conclusive in that an application for CPO does not necessarily mean it will be granted. It is accepted of course that development should not prejudice the bringing forward of adjoining land and that this will require consideration to future redevelopment on neighbouring sites, however the Council's desire for site assembly should not become the landowner/developers responsibility with regards to design costs of a comprehensive scheme.	N/S	N/S	Support for Policy AAP22 is noted. As stated in the reasoned justification to the Policy, the use of CPO is a tool of last resort, and therefore the onus is the developer, not the Council, to demonstrate their case for Council's use of such powers.
10	067	CBRE on behalf of Dandara Ltd	Chapter 5 – conceptual illustrations for each site allocation		<p>Since the submission of their representations in February 2012, our client has met with the Council to discuss the site specific policy basis of the previous version of the AAP. In those discussions our client expressed considerable reservations that the indicative concept plans would be taken as representing the general 'approved' concept for the layout of that particular site. The basis of this concern being that these sketches have been prepared with no technical information or understanding of a site's constraints. In this respect such sketches are unlikely to be realistically achievable and therefore misleading, particularly to the lay person who may assume that a sketch is a proposal for a site. The Council's position was that these were only indicative with no such intent.</p> <p>However, as the recent GLA Stage II Report to the Harrow View proposals by Land Securities demonstrates the GLA very much take that view and give emphasis to the indicative concept layouts. In their Report (PDU#2830) they state at paragraph 10 "..... increased symmetry between the site layout promoted by the Harrow &amp; Wealdstone AAP and that proposed within the outline masterplan application".</p> <p>In response to our concerns, the Council agreed to caveat Site 18's indicative concept plan with the statement that the final design and layout "...may be wholly different to the conceptual illustration provided above". Our client believes that no concept plan should be included within the AAP. However, if the Council is not prepared to</p>	Remove all concept plans from the AAP or extend the caveat to all allocated sites	N/S	<p>At the meeting with agents for this site, the Council highlighted the fact that the vast majority of AAPs included illustrative drawings, many more detailed than that proposed within the Harrow AAP. However, in response to the concerns raised by the respondent at the AAP Preferred Option stage, to the use of site illustrations, the Council amended paragraph 5.2 of the introductory text to Chapter 5 to clearly state that "A conceptual illustration is provided to show how the site objectives, dependencies and design considerations might be addressed on the site. However, such illustrations are not intended to be prescriptive. The final layout and design will need to respond to the Area Action Plan policies and site specific guidance, set out below, and will need to be thoroughly tested through the planning application process".</p> <p>While the Council considered this was sufficient to cover all allocated sites within Chapter 5, for completeness, and because the respondent was the only one to raise this as an issue, the Council also amended the text to Site 18 as stated in the respondents comments. The Council is therefore satisfied that such amendments adequately address the concerns of the respondent.</p> <p><b>No change</b></p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					remove these then this caveat should be extended to all allocated/identified sites that include a conceptual layout plan to avoid ambiguity on the status of these "sketches".			
10	068	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, redline boundary	No	Site 18 – Our client objects to the inclusion of 51 College Road as part of a wider Site 18 and is of the view that the site should be considered independently of neighbouring properties, as per the previous drafts of the AAP. Whilst the Council's desire to bring about comprehensive redevelopment of this part of the Metropolitan Centre is acknowledged this could essentially be a timely and fruitless exercise, whereas our client has continually expressed a desire to bring its land holding forward. Whilst our client acknowledges the need to consider neighbouring properties there appears to be no reason for 51 College Road not be pursued as an individual site.	Identify 51 College Road as an individual site	N/S	The Council broadly agrees. It was the Council's understanding, through discussion with the agents, that layout and design considerations for the redevelopment of the former post office were constrained by existing adjoining buildings. The intention behind including the adjoining sites within the allocation boundary was to allow for such constraints to be potentially overcome through a workable solution for the whole site that enabled the development at 51 College Road to be delivered without constraint to the existing context, regardless of the timing of subsequent phases. However, this is predicated on a whole site solution being agreed between the parties. Where such an agreement can not be reached, prior to planning permission being sought for any individual parcel of land within the site, the Council agrees that the individual parcels should still be allowed to come forward for redevelopment on their own but on the understanding that the existing neighbouring property context still prevails. The Council therefore considers it appropriate to clarify this in both the Site Constraints and Delivery sections of the allocation – <b>see proposed minor modifications no. AAP27 and AAP31</b>
10	069	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Objective 5	N/S	They support the Key Site Objectives but would recommend that Objective 5 be expanded to include, at the end of the existing text the words: "...and establish a landmark marker for Harrow town centre".	Amend Objective 5 to include "...and establish a landmark marker for Harrow town centre".	N/S	It is not clear what is meant by 'a landmark marker'? The Council considers the existing objectives to be sufficient and clear without the inclusion of the suggested wording. <b>No change</b>
10	070	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Objective 6	N/S	Whilst opening up a new view(s) to St Mary's Church from the site is generally supported this should be flexible, in that the redevelopment of the site and the benefits for the Metropolitan Centre should be the key driver. The provision of such view(s) should be secondary to this and only be incorporated where possible where this would not have a negative impact on the design and layout of any development proposals. If the development provides such view(s), and notwithstanding our comments below, the Council should not also seek the provision of a viewing gallery/platform at roof level (para 4.70).	N/S	N/S	Consultation on the Core Strategy and the AAP has highlighted the visual disconnect between the town centre and Harrow on the Hill. While the Council agrees that redevelopment of the site is a priority, hence the site's allocation within the AAP, the Council maintains that one of the key objectives of such redevelopment is to open up a new view(s) to St Mary's Church, helping to reconnect and strengthen the relationship between the town centre and Harrow Hill, as a feature of significant cultural and historic importance to the Borough. The opening up of a new view(s) from within the site, and provision for tall buildings to incorporate publicly accessible areas on the upper floors, where appropriate, are two separate requirements. The Council considers there is no compelling argument to warrant a compromise or trade-off between the requirements, when redevelopment of the site offers the potential to deliver both outcomes sought. <b>No change</b>
10	071	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Leading and Supporting Land Uses	Yes	The Leading and Supporting Land Uses are all supported and our client is grateful for clarification that these are targets and not minimum numbers and has assumed that this remains the case. In addition, it should be noted that the actual number of units will depend ultimately on the mix of the development, together with need/demand and this creates the flexibility required. Consequently a smaller number of unit may, as part of a mixed use scheme ultimately come forward.	N/S	N/S	Support for the changes made to the leading and supporting land uses and housing targets, as a result of consultation at the AAP Preferred Option stage, is noted. As are the comments regarding actual unit numbers to be delivered.
10	072	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Design Consideration	N/S	Design Considerations – The first paragraph only highlights two elements of the Secretary of State's decision that was deemed acceptable.	Accordingly the paragraph should be amended to read as follows: "The Secretary of State has	N/S	The Council has read through the Secretary of State's decision letter of 22 July 2010, and the Planning Inspector's report, in particular paragraphs 159-171, and is satisfied that the wording of the AAP is an accurate reflection of their findings.



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
			s			<i>already accepted that a tall building, up to 19-storeys in height, on this site is acceptable having regard to the urban design and views analysis work already undertaken. He has also stated that it would be acceptable for a building of this height to project above the Harrow Weald Ridge and that it would not adversely the character and setting of the adjoining conservation area, listed buildings or metropolitan open land provided that world class architectural design is achieved."</i>		<b>No change</b>
10	073	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Site Constraints, 4 <sup>th</sup> paragraph	N/S	Paragraph 4 refers to the opportunity to provide physical and visual permeability into, within and through the site and specifically that there should be "...the creation of new views to St Mary's Church". This issue is also picked up in the Key site Objectives, Site Constraints/Dependencies and Concept Diagram. The text is explicit that the requirement is to provide new views from the site but this is not reflected in the concept diagram and accordingly the diagram should be appropriately amended given the sites wider constraints, as identified across the AAP DPD, design constraints should not seek to restrict how the physical design of the site might come forward and this could stifle innovation, the achievement of architectural quality and the delivery of the wider objectives for Harrow Town Centre. The requirement to provide views across the site, as annotated within the concept diagram, will sterilise large areas and will limit the exploitation of the sites potential. As for views from within the site towards St Mary's, our client has reservations as to the inclusion and potential impacts of such a requirement, as stated above, and whilst accepting the objective to provide such view(s) seeks flexibility to ensure there is no pre-conceived idea as to where these should be located and that the creation of such view(s) will not be at the expense of design or economic redevelopment objectives. Their understanding is that this is what is intended but this is not, in their judgement, what is currently reflected in the Site 18 parameters as a result of the conceptual diagram.	Seeks flexibility to ensure there is no pre-conceived idea as to where the newly created view(s) should be located and that the creation of such view(s) will not be at the expense of design or economic redevelopment objectives.	N/S	As stated previously, and clearly stated in the AAP, the conceptual illustrations are not intended to be prescriptive. The reason for showing the creation of a new view(s) as extending from College Road was to highlight the fact that the new view(s) could be created anywhere along this view cone corridor, rather than limiting the consideration to the creation of a new view(s) only within the site, accepting however, that the latter is likely to be the most plausible outcome and therefore the opportunity identified within the text. With respect to flexibility, the Site Constraints and Design Considerations sections of the allocation are clear that the site offers the <u>opportunity</u> to open up new view(s) to St Mary's Church from within the site. The Council would therefore expect all opportunities to be explored and for robust justification to be provided should a proposal be put forward that did not realise this opportunity. <b>No change</b>
10	074	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Design Considerations, 7 <sup>th</sup> paragraph	No	In respect of the requirements for a tall landmark building and the need to meet the policy requirements of APP6, our client's objections in respect to this policy, as stated above, are reiterated above. At paragraph 7 our client objects to the use of the word 'significantly'. This is ambiguous and undefined and any development should be brought forward on the basis of a comprehensive urban analysis and on the basis of architectural quality as required by the London Plan and Core Strategy. They would propose the deletion of the words "...and significantly subordinate".	Delete the words "...and significantly subordinate".	N/S	The wording of the paragraph simply reiterates the requirements of Policy AAP6F, the justification for which is set out paragraphs 4.57 to 4.61 to that Policy. <b>No change</b>
10	075	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Site Specific Infrastructure	No	Our client objects strongly to the requirement to provide an Upper Level amenity area for the reasons set out previously. Further, both a viewing platform and the creation of a view to St Marys Church could significantly compromise the design, viability and deliverability of a significantly constrained site. The main objective for this site has to be its positive redevelopment and contribution to the Metropolitan	Delete requirement to provide an upper level amenity area.	N/S	The Council agrees. The terminology used is not consistent with that of Policy 7.7 C (h) of the London Plan – <b>see proposed minor modification no. AAP30</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					Centre.			
10	076	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Delivery	No	Our client is expecting to submit an application in early 2013 with a projected completion of 2016. Whilst they appreciate the Council's desire to include adjoining pockets of land, they have previously demonstrated that the land in their ownership can be brought forward without compromising the subsequent delivery of these additional sites in the future. This was quite clearly accepted in the Secretary of State's appeal decision. As stated previously our client is of the view that the inclusion of sites outside of their ownership within Site 18 is misleading as it is unlikely that they will ever be comprehensively developed. This is equally recognised within the Delivery section. There should be no requirement on our client to comprehensively design development for a wider site area than they have control of because they will progress their site before others are in a position to be brought forward.	Recommend that a final paragraph be added to this section which states that: <i>"The first phase of any development of this site should set the design parameters for subsequent phases as and when these occur. The development of Phase 1 should not compromise future delivery of these areas nor should those areas stifle or prevent the development of the former Post Office section of the site"</i> .	N/S	The Council broadly agrees. It was the Council's understanding, through discussion with the agents, that layout and design considerations for the redevelopment of the former post office were constrained by existing adjoining buildings. The intention behind including the adjoining sites within the allocation boundary was to allow for such constraints to be potentially overcome through a workable solution for the whole site that enabled the development at 51 College Road to be delivered without constraint to the existing context, regardless of the timing of subsequent phases. However, this is predicated on a whole site solution being agreed between the parties. Where such an agreement can not be reach, prior to planning permission being sought for any individual parcel of land within the site, the Council agrees that the individual parcels should still be allowed to come forward for redevelopment on their own but on the understanding that the existing neighbouring property context still prevails. The Council therefore considers it appropriate to clarify this in both the Site Constraints and Delivery sections of the allocation – <b>see proposed minor modifications no. AAP27 and AAP31</b>

N/S – Not Specified

#### Respondent 11: Roxborough Residents Association

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
11	077	Louise Leadbeater - Roxborough Residents Association	Paragraph 2.23	N/S	We would suggest that the provision of 2,800 additional homes and the increase of over 4,000 residents cannot be justified until a more robust analysis of traffic flows is carried out, as stated in para 2.23	A more robust analysis of traffic flows needs to be undertaken	N/S	The traffic impact assessment for the AAP was itself a refinement of the Borough-wide transport audit undertaken to inform the Core Strategy. While both studies confirm there are existing capacity issues at a number of junctions that will come under more stress as a result of the planned growth, neither identified any 'show-stoppers' – with the latter showing that measures could be implemented to mitigate growth impacts. The Council is satisfied that both studies were appropriate in detail to understand the cumulative impacts of forecast growth on traffic flows. While more detailed studies would be beneficial, there are budget constraints that unfortunately do limit the evidence gathered to that necessary to satisfactorily underpin the growth strategy and development quantum therein. <b>No change</b>
11	078	Louise Leadbeater - Roxborough Residents Association	Site 15: Bradstowe House	N/S	Planning permission for this was granted some years ago, at a time when permissions were granted on a more ad hoc basis than they are today. Given the close consideration the Council now gives to design of buildings and how they fit in to the surroundings, we would not have thought this project, if it were submitted for planning today, would receive Council approval in its current form. The adjacent underpass is highlighted in the AAP as a key pedestrian link and the building does nothing to enhance this link. We appreciate the Council must still be in discussions with the administrators, or their successors over the future of this site, however we think the wording in the design considerations could be more specific. Although this is a consented scheme, the applicant is in breach of its S106 commitments and an opportunity would appear to exist for the Council to force the arm of the current owner to create a design so that it compliments nearby Neptune Point and enhances the use of the underpass.	The wording in the design considerations could be more specific – however, no suggested wording provided	N/S	As the respondent states, this is a consented and implemented scheme – although stalled due to economic conditions. The priority for the Council is to see this development completed, and therefore the Council may need to be flexible rather than rigid in its negotiations with any new owner. However, if there are better outcomes to be achieved (i.e. through alignment of any renegotiated obligations with the AAP and Sub Area objectives), then the Council will pursue these, including design considerations and urban realm improvements. <b>No change</b>

N/S – Not Specified

**Respondent 12: Preston Bennett on behalf of MP&G Trading**

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
12	079	Preston Bennett on behalf of MP&G Trading	Site 6: Palmerston Road / George Gange Way	Yes	The proposed allocation of the Palmerston Road site (to include 37-41 Palmerston Road in respect of which proposal discussions are well progressed with the LPA) is strongly endorsed.	None	Yes	The Council notes that MP&G Trading strongly endorse the allocation of Site 6 within the AAP.

**Respondent 13: CgMs on behalf of MOPAC and the Metropolitan Police**

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
13	080	CgMs on behalf of MOPAC and the Metropolitan Police	AAP 15: Supporting the Business Sector in Wealdstone	Yes	The MOPAC/MPS support Policy AAP 15 which requires applicants for mixed use developments on employment sites to demonstrate that efforts to secure essential community infrastructure not appropriate for town centre locations (e.g. police patrol bases, custody centres) have been explored but have not been successful. This is consistent with the prevailing planning policy framework and should therefore be retained.	None	N/S	MOPAC/MPS support for Policy AAP15 is noted.
13	081	CgMs on behalf of MOPAC and the Metropolitan Police	AAP 16: Supporting the Service Sector in Harrow Town Centre	Yes	The MOPAC/MPS support Policy AAP 16 which recognises community facilities as appropriate uses within Harrow Town Centre. This is consistent with strategic and local planning policies and should be retained within the emerging AAP.	None	N/S	MOPAC/MPS support for Policy AAP16 is noted.
13	082	CgMs on behalf of MOPAC and the Metropolitan Police	Glossary	Yes	The MOPAC/MPS support the inclusion of a definition of community facilities (which includes policing facilities) within the glossary of the emerging AAP.	None	N/S	MOPAC/MPS support for the definition of 'community facilities' within the AAP Glossary is noted.
13	083	CgMs on behalf of MOPAC and the Metropolitan Police	Chapter 5, Sub Area: Wealdstone Central	N/S	<p><i>Wealdstone Police Station</i></p> <p>As per our November 2010 reps towards the 'Call for Sites' consultation and our comments towards the Harrow &amp; Wealdstone AAP in June 2011 and February 2012, the MOPAC/MPS recommend that Wealdstone Police Station is allocated for a residential-led development within the emerging AAP.</p> <p>The designation of particular policing facilities for redevelopment allows the MOPAC/MPS to implement their Estate Strategy which is seeking better and more accessible facilities and services to serve community policing and the disposal of exiting older properties which are no longer fit for purpose or inefficient to maintain. A key aspect of the Strategy it that there will be no closures until replacement facilities have been found and are fully operational which ensures that effective borough policing can be maintained.</p> <p>Wealdstone Police Station has been identified as being surplus to requirements. The previous operations from the site are therefore being relocated to Harrow Police Station and within the Harrow Civic Centre.</p> <p>The consideration of alternative uses at the site is consistent with</p>	Include Wealdstone Police Station within the AAP site allocations for a residential-led development.	N/S	<p>Officers of Harrow Council meet with the agents for MOPAC and the Metropolitan Police following representations made to the AAP Preferred Option consultation. At that meeting, the Council agreed that the redevelopment of the existing Wealdstone Police Station could form part of the AAP site allocations, as it would help contribute to the regeneration of Wealdstone. However, the Council clarified that Core Policy CS1Z resists the loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities. The Council therefore requested that MOPAC and the Metropolitan Police Service provide such evidence as appropriate (e.g. an up-to-date estates management strategy) to satisfy the policy requirements and demonstrate how the Borough's policing accommodation needs were to be met that would then justify releasing this site for community use. The Council informed the agents that without such evidence it would not be possible to allocate the site for an alternative use within the AAP as this would be contrary to the Core Strategy, noting also that the requirement for robust and credible evidence led-plan making had not altered under the NPPF.</p> <p>The agents acting on behalf of MOPAC and the Metropolitan Police advised that they would get back to the Council and supply such evidence as appropriate to satisfy the Council's requirements.</p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					<p>Saved UDP Policy C2 which allows the loss or change of use of community facilities where a suitable replacement is identified.</p> <p>In terms of potential alternative uses, the building lends itself to residential conversion due to its Grade II Listed status. In addition, the yard area to the rear of the site could provide a mix of uses including, but not limited to, residential, commercial and office floorspace.</p> <p>Given the site's location in the District Centre and primary shopping frontage, a mixed-use development would be entirely appropriate and in accordance with the NPPF, London Plan and Harrow's adopted Core Strategy. Furthermore, draft Policy AAP17 states that within primary shopping frontages, the use of ground floor premises for retail, financial and professional activities, restaurants &amp; cafés and pubs &amp; bars will be permitted provided that:</p> <ul style="list-style-type: none"> <li>• The length of the primary frontage in non-retail use at street level in the centre (excluding any extant planning permissions) would not exceed 25%;</li> <li>• The proposal would not result in a concentration of more than unit frontages in non-retail use;</li> <li>• The use would not create inactive frontage during the day; and</li> <li>• The use would not be detrimental to the amenity of neighbouring occupiers or highway safety.</li> </ul> <p>The area surrounding the site comprises a range of different uses although the High Street consists primarily of commercial uses at ground floor level with accommodation above. Neighbouring the site to the south, fronting the High Street, is a former public house. Planning permission was granted in August 2011 for redevelopment to provide 3/6 storey block of 31 flats and 675 sq. m. of retail floor space (LPA ref. P/2241/09). Development of this site is yet to commence. Adjacent to this a development is emerging which comprises 51 residential units on the land fronting the A409 (LPA ref. P/1770/09). Opposite the Police Station across the A409 are Swanley House and Christie House, are 6-storey residential apartments. The allocation of this site for residential-led redevelopment would therefore be in keeping with the neighbouring uses.</p> <p>The residential allocation would also comply with the NPPF's requirement for local planning authorities to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres and to recognise that residential development can play an important role in ensuring the vitality of centres (para 23).</p> <p>Balanced with this is the need for housing. The NPPF states that <i>'local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty home strategies... they should normally approve planning applications for change to residential use and any associated development from commercial buildings where there is an identified need for additional housing in that area, provided there are not strong economic reasons why such development would be</i></p>			<p>However, no such evidence was received by the Council to consider prior or subsequent to preparing and consulting on the AAP Pre-Submission document, and as such the site was not included as a site allocation within the AAP Pre-Submission document.</p> <p>The Council's position was again clearly set out in its response to the MOPAC and Metropolitan Police Service AAP Preferred Option representation (see the Cabinet paper report of 20 June 2012 and the Regulation 21(1)(c) Consultation Statement that was published on the Council's website alongside consultation on the AAP Pre-Submission document).</p> <p>Notwithstanding the above, the non-allocation of the site within the AAP would not prevent the site from coming forward for redevelopment at any time over the life of the Plan. Subject to appropriate evidence being submitted to satisfy the requirements of Core Policy CS1Z, a proposal for redevelopment of the site would be determined in accordance with the relevant policies of the AAP and the objectives for this sub-area.</p> <p><b>No change</b></p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					<p><i>inappropriate</i>' (para 51). Whilst the Council can demonstrate a 5-year supply of housing to meet the Mayor's target, this target represents a <b>minimum</b> and is appropriately assessed in parallel with London Plan Policy 3.4 which requires development plan preparation to optimise housing output.</p> <p>For the above reasons, the allocation of the Wealdstone Police Station site for residential-led mixed use redevelopment will ensure consistency with the NPPF, London Plan and Harrow's emerging Local Development Framework and will ensure that an effective police service can be maintained across the Borough.</p>			

N/S – Not Specified

#### Respondent 14: Christopher Langley

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
14	084	Christopher Langley	General comment	Yes	Despite serious shortcomings in content, the writer of this document should at least be complimented on improving its structure, and for once, giving a succinct explanation of how Harrow Planning Department see the issues and their proposals is written. Should such a professional presentation have been adopted earlier, the public response to its contents may well have resulted in a proper debate.	None	N/S	While the Council notes the comments, it is typical that as plans are prepared, they are refined and more detail added at each stage as greater clarity emerges about the final product.
14	085	Christopher Langley	General comment	N/S	The document highlights the lack of joined up thinking in the Council and, despite Harrow's excellent communication links, selective opportunities for growth and employment, fails to map an objective for Harrow's development of which the building of 3000 dwellings will have a major impact. There is no business plan.	N/S	N/S	<p>The Council disagrees and considers the AAP represents a blueprint for the comprehensive and coordinated regeneration of the whole of the Heart of Harrow. The allocations identified are not selective but represent available and deliverable sites.</p> <p><b>No change</b></p> <p>With regard to a business plan, the responsibilities of the Council in project managing the implementation of the AAP are to be included in a proposed minor modification to Chapter 6: Delivery, Implementation and Monitoring – <b>see proposed minor modification no. AAP34</b></p>
14	086	Christopher Langley	Chapter 3, AAP Objective 7	N/S	The documents insistence that now 3000 and not the original forecast of 2500 jobs will be created, is pure fiction and there is no reference to how such an aspiration could have been calculated or will be achieved. Also missing are any statements on the considerable reduced semi and unskilled skilled employment opportunity in Wealdstone and locally. Its impact on social cohesion for the housing proposals and the new skill mix required to meet the needs of employers locally and within commuting distance and how the new build will attract such residents as part of Harrow's inward investment program. Social housing starts, approved by Harrow Planning since the start of the consultation process in 1998 and included in the current issue, are an eyesore, adding to the many other examples of poor architectural design approved by Harrow Planning. Such buildings now resplendent with satellite dishes pock marking every orifice, to compliment other buildings, temporary fencing placed on balconies to hide the washing and having no regard to the local architecture add to the doom and gloom of the locality.	None	N/S	The jobs figure for the Heart of Harrow has always been quoted as 3,000, as confirmed in the Preferred Option (November 2010), the Pre-submission (April 2011) and adopted versions of the Core Strategy (February 2012) (see page 40 of the adopted Core Strategy). The jobs figure is derived from the Employment Land Review (2010) and confirmed through development scenario testing undertaken by consultants GVA as part of the site capacity analysis. With regard to semi and unskilled employment opportunities, the AAP makes provision for a wide range of employment accommodation, tailored to better meet local needs and opportunities. Overall, the Council also considers the AAP establishes robust policies to significantly improve the design quality of new development within the Heart of Harrow (see Policy AAP4: Achieving a High Standard of Development throughout the Heart of Harrow, in particular). Matters such as the visual blight caused by satellite dishes are included in the Residential Design SPD which is referenced in Policy AAP13: Housing within the Heart of Harrow, part B, although it should be noted that certain allowances are made



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
								by Government as of right as permitted development. However, there are no such constraints to building / site management companies or body corporations controlling and enforcing against such visual amenity impacts. <b>No change</b>
14	087	Christopher Langley	General comment	N/S	The document fails to financially quantify any of the proposals including council tax income, the extra cost to the Borough in education, social workers and policing or reflect or present the continuing changes in UK, Harrow Town Centre or District retailing despite several Government, the Mayor of London's report on the subject and, major retailers statements and well known local problems.	None	N/S	The evidence base in support of the Harrow Core Strategy and the Area Action Plan is comprehensive and, with the exception of Council tax income, cover all of the other matters listed. These have been used to inform the proposals and policies of the local plan and, where relevant, are cross-referenced in the local plan documents. All evidence base studies are made available to view and download on the Council's website. <b>No change</b>
14	088	Christopher Langley	General comment	N/S	The fact that Harrow Town Centre is, in the words of the author, a mess architecturally is an own goal. There is no input from the Town Manager or recognition of the importance of making Harrow different to or building on the success of others and especially, how others see Harrow.	None	N/S	In the course of preparing the AAP, the Council met several times with the Harrow Town Centre Form, which includes the town centre managers for St. Ann's and St. George's shopping centre's as well as representatives for the broader retail and commercial interests of the town centre. The consultation confirmed that there is no appetite to make Harrow town centre different. This is also borne out in Experian data on the relative strengths of town centres across the UK and the South East which shows Harrow Town Centre remains one of the more buoyant against a fairly bleak economic picture for retail and town centres generally. The strategy set out in the AAP therefore responds to this by seeking make provision for new retail development to maintain Harrow town centre's market share, whilst at the same time, it takes on board many of the recommendations of the recent Mary Portas review, with respect to improving the overall quality of the town centre environment, making provision to enable a diversification of town centre uses, and ensuring new development is able to adapted to better respond to changing circumstances. The Council therefore considers the strategy set out in the AAP is the most appropriate. <b>No change</b>

N/S – Not Specified

#### Respondent 15: GVA on behalf of AIB Ltd

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
15	089	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Objectives	Yes	Our client continues to support the proposed key site objectives. We consider that no amendments need to be made to this section.	None	N/S	AIB Ltd's support for the key site objectives for Site 18 is welcomed and noted.
15	090	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Land Uses	N/S	It is not clear whether the list of 'leading' and 'supporting' land uses are requirements (i.e. they must all be provided in order to accord with the AAP) or whether they are a list of acceptable uses that can be selected from (our assumption). In order to provide clarity, we recommend that these should be re-titled as 'acceptable leading' and 'acceptable supporting' land uses in order to confirm the position. We agree that Class D1 use is appropriate for a town centre site such as this however, bearing in mind the scale of the proposed development and the lack of evidence to demonstrate how this use could be	Recommend that 'Leading land use' and 'Supporting land use' be re-titled 'acceptable leading' and 'acceptable supporting' land uses.  And that  The Class D1 use is reclassified	N/S	Paragraph 5.2 of the introductory text to Chapter 5: Sub Area and Site Specific Guidance, clarifies that a leading use(s) and supporting uses are specified to direct the nature of the acceptable mix of uses for the site. <b>No change</b>  With respect to the Class D1 use, the Council maintains that this is a leading land use for the site. Funding sources are listed in the Infrastructure Schedule at Chapter 6.

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					funded, it is inappropriate to include this as a 'leading' use (on delivery grounds). We recommend that this use is reclassified from an 'acceptable leading land use' to an 'acceptable supporting land use'. Our client welcomes the additional flexibility provided by supporting a range of town centre uses on this site (which now includes Class A2, A4, D2, B1, C1 and C2 uses). These land uses are appropriate to this location and the flexible range of uses help to enable a viable development scheme to come forward on the site, tailored to meet local needs arising and future market demand.	from an 'acceptable leading land use' to an 'acceptable supporting land use'.		<b>No change</b>  The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
15	091	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Target Outputs	Yes	The target outputs for the site are supported by our client.	None	N/S	AIB Ltd's support for the target outputs for Site 18 is welcomed and noted.
15	092	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Site Description	Yes	The site description is also supported by our client.	None	N/S	AIB Ltd's confirmation of the site description for Site 18 is welcomed and noted.
15	093	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Site Constraints / Dependencies , 2 <sup>nd</sup> paragraph	N/S	In general our client supports the majority of the identified site constraints and dependencies. We note that the area of land relating to this site-specific allocation has now been extended to incorporate the buildings to the north east of the former Royal Mail sorting office. Site 18 now relates to 17-51 College Road, which comprises two separate land parcels. Our client is concerned about the wording of the second paragraph in this section, which specifically relates to the ambition to achieve a comprehensive solution for the whole site. We consider that this paragraph is confusing when read alongside the two last paragraphs in the 'Delivery' section, which supports the delivery of 2 separate developments on this site. While the principle of a site-wide approach is understandable we must ensure that this does not prejudice the redevelopment of the former Royal Mail site which is available for development now (unlike the remainder of the site which is subject to land assembly issues). We request that the paragraph in the 'Site Constraints' section is reworded to ensure that any future development on this site is not constrained or limited by the availability at any given time of the adjacent parcel of land.	We suggest that this paragraph is rephrased as follows: <i>'Site 18 comprises two distinct parcels of land which are under different ownerships. The former post office land is available for development now while the availability of the remainder of the site is dependant on land assembly. Land availability issues with the remainder of the site should not delay or compromise the early development of the former post office site and therefore the Council will accept separate planning applications for each land parcel. Proposals will be expected to demonstrate that they do not prejudice the delivery of development on the remainder of the site and that they contribute to the achievement of site wide objectives'.</i>	N/S	The Council broadly agrees. It was the Council's understanding, through discussion with the agents, that layout and design considerations for the redevelopment of the former post office were constrained by existing adjoining buildings. The intention behind including the adjoining sites within the allocation boundary was to allow for such constraints to be potentially overcome through a workable solution for the whole site that enabled the development at 51 College Road to be delivered without constraint to the existing context, regardless of the timing of subsequent phases. However, this is predicated on a whole site solution being agreed between the parties. Where such an agreement can not be reached, prior to planning permission being sought for any individual parcel of land within the site, the Council agrees that the individual parcels should still be allowed to come forward for redevelopment on their own but on the understanding that the existing neighbouring property context still prevails. The Council therefore considers it appropriate to clarify this in both the Site Constraints and Delivery sections of the allocation – <b>see proposed minor modifications no. AAP27 and AAP31</b>
15	094	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Design Considerations	N/S	Our client supports the recognition that the final design and layout of development on the site may be 'wholly different to the conceptual illustration' provided. This enables a design led approach to come forward to achieve the highest quality design for the site. Overall, our client supports the majority of the design considerations put forward. However, we remain concerned that some of the design considerations remain overly prescriptive and may not enable the most flexible and viable design to be achieved on the site. Our main concerns relate specifically to building heights and provision of civic/community uses, as detailed below:	None	N/S	Support for the majority of the design considerations is noted as are the concerns regarding building heights and provision of civic/community uses, which the Council addresses below.
15	095	GVA on behalf of	Site 18: 17 to	N/S	We support the retention of policy support for a tall building of up to	Accordingly, we recommend that	N/S	The building heights shown on the illustrative diagram and set out in

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
		AIB Ltd	51 College Road, Design Consideration s: Building Heights		19 storeys in height to be delivered on the site. This has been deemed as acceptable by the Secretary of State on the basis of sound design-based evidence and is a wholly logical policy position to take. Our client welcomes the opportunity to provide a quality landmark for the town centre to make a significant positive contribution to the town centre and the Harrow skyline. As per the illustrative design guidance, the site has capacity to accommodate further buildings in addition to the 19-storey principal building. The draft AAP requires these buildings to have building heights of 8-10 and 5-7 storeys (a reduction in the scale proposed in the Preferred Option draft). We consider there to be no evidence or justification to support such prescriptive building heights and it is our view that this does not allow for sufficient flexibility to allow the most appropriate design-led scheme to be brought forward.	the guidance on building heights for the further/supporting buildings is relaxed to require a design-led approach to determining height, massing and scale, which should specifically allow for taller buildings, as opposed to setting heights at this stage.		the Design considerations are derived from the Urban Character Assessment undertaken by East and responds to the requirements of Policy AAP6F that, where a proposal for a tall landmark building includes the development of other buildings on site, the height of all other buildings shall be significantly subordinate to the tall landmark building. The justification for the policy requirement is set at out paragraphs 4.57 to 4.61. Paragraph 4.61 also confirms that clusters of tall buildings are inappropriate within the context of the Heart of Harrow. The Council considers that the prescribed building heights respond to the local and wider context, and therefore, it will be for the developer to robustly justify through their proposed design, the case for heights in excess of those outlined <b>No change</b>
15	096	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road Design Consideration s: Civic and Community Uses	N/S	In relation to the final paragraph in this section, we do not consider this paragraph (which relates to provision of civic and community uses on the site) should be included as a 'Design Consideration'. The support for provision of Class D1 civic/community uses is identified in the acceptable land uses section and therefore there is no purpose for this inclusion and we request that this paragraph is removed.	Request that the last paragraph of the Design Considerations is removed.	N/S	The Council agrees that the provision of civic and community uses on the site is already identified in the leading land use and that the paragraph adds little in terms of design considerations. However, in preference to removing the paragraph, the Council considers the paragraph should be amended to include design considerations for the locating of civic and community uses within the site – <b>see proposed minor modification no. AAP29</b>
15	097	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Site Specific Infrastructure	No	Whilst we support the principle of providing community uses on this site as an 'acceptable supporting land use', our client is concerned about the specific reference to a new Harrow Central Library, on the basis that this requirement could have a significant impact on the viability of development. The Council has provided no evidence to demonstrate how such a facility could be funded or who/how it could be delivered. This questions whether or not the proposal is deliverable which suggests that this requirement is not sound.	In order to ensure that a viable and deliverable solution can be brought forward we recommend that the specific requirement/reference to a new Harrow Library should be deleted.	N/S	The details of the requirement for the new Central Library are provided in the Council's Infrastructure Assessment and Delivery Plan. Funding sources for the provision of the new Central Library are listed in the Infrastructure Schedule at Chapter 6. <b>No change</b>
15	098	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Delivery	N/S	Reflecting that the site has now been extended and incorporates the development of the land adjoining the north east of the former Royal Mail sorting office, we are pleased that the Council acknowledges that the development of the site is 'likely to come forward in at least two phases'. It is of paramount importance to our client that the redevelopment of the site is not held back or constrained in any way by the lack of availability of the adjacent land. Our client remains committed to supporting the redevelopment of the former Royal Mail sorting office. The deliverability of the site requires an effective site-specific policy in the Harrow AAP, which is sufficiently flexible to develop a viable scheme. We have expressed our client's remaining concerns about the wording of the site-specific policy, which we consider need further refinement and amendment through the schedule of minor amendments to be submitted to the approved AAP Inspector. Overall our client maintains its support for the Pre-Submission draft AAP proposals in relation to Site 18 in principle, however there our outstanding concerns which we consider could be positively addressed to ensure the future viability of a development proposal coming forward.	None	N/S	AIB Ltd's in principle support for the draft AAP proposals in relation to Site 18 are noted, as are the outstanding concerns outlined. The Council welcomes AIB Ltd's continual engagement in the AAP and shares AIB Ltd's desire to see this important town centre site brought forward for redevelopment.

N/S – Not Specified

#### Respondent 16: Mr. Michael Loundes on behalf of Lindengruppen

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
16	099	Mr. Michael Loundes on behalf of Lindengruppen	Site 4: ColArt		Lindengruppen/ColArt welcomes the emphasis of the emerging policy on encouraging a mixed use development of the site where the value generated by high quality enabling housing can be harnessed to provide an appropriate and viable range of community benefits including jobs, education use and affordable housing use along with new public realm. The detailed comments made below are offered to ensure that the approved site specific policy will genuinely and viably support the achievement of the mutually shared vision for the site. 1. In order to support the viable provision of education land for an extension to the Salvatorian College it would be appropriate for the key diagram to be modified to show the potential use of the land to the north of the site currently shown as community/education use to be more appropriately identified for education/community/residential uses and for this revised designation to overlap the southern part of the land parcel currently shown only for education use.	Modify the site diagram to show the potential use of the land to the north of the site, currently shown as community/education use, to be education/community/residential uses and for this revised designation to overlap the southern part of the land parcel currently shown only for education use.	N/S	The Council agrees and understands, following pre-application discussions, that the amount of land required by the College for expansion has now been confirmed and would propose to amend the site illustration diagram to reflect this, and on the basis that the education land is set aside to remove the community use designation and amend the text accordingly – <b>see proposed minor modification no. AAP22</b>
16	100	Mr. Michael Loundes on behalf of Lindengruppen	Site 4: ColArt		The key diagram shows a 'key route' through land which cannot physically accommodate vehicles and pedestrians (third east-west route from the bottom). This alignment should be deleted and shown instead to replace that which is currently (fourth east-west route from the bottom) shown as a pedestrian only route. The north-south route linking the 'key routes' should also be shown as capable of accommodating circulation of all modes including pedestrians.	The key routes through the site require amending on the site diagram.	N/S	The Council agrees and acknowledges that, through pre-application discussions the key routes through the site had been amended and agreed but an error on the Council's part did not see these included in the site illustration in the Pre-Submission document – <b>see proposed minor modification no. AAP22</b>
16	101	Mr. Michael Loundes on behalf of Lindengruppen	Site 4: ColArt		It should also be noted that the former industrial buildings that sit behind the former office building are not physically or commercially capable of accommodating conversion to new or continued uses.	The reference to, and illustration showing, the possible retention of former industrial units, should be removed from the site diagram.	N/S	The Council agrees and acknowledges that, through pre-application discussions the possible retention of the industrial sheds been amended but an error on the Council's part did not see this amendment included in the site illustration in the Pre-Submission document – <b>see proposed minor modification no. AAP22</b>

N/S – Not Specified

#### Respondent 17: RPS Planning on behalf of Person Pensions Property Fund

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
17	102	RPS Planning on behalf of Person Pensions Property Fund	Paragraph 4.206	No Not Justified	Paragraph 4.206 of the Harrow and Wealdstone Area Action Plan (AAP) states that the 2009 Harrow Retail Study recommends that provision is made for 38,900sqm of retail floorspace for the plan period to 2026, and it is indicated that the focus for new retail development is to be within Harrow Town Centre.  RPS disagrees with this retail target of 38,900sqm as this is a lower target than what is actually recommended in the Harrow Retail Study. The Retail Study predicts that there will be a requirement for 38,912sqm net comparison and 5,261sqm net convenience floorspace by 2025, providing a total of 44,173sqm. This is also a year short of the plan period. In addition, as the Retail Study was undertaken in 2009, it is considered to be out of date and may not reflect current retail needs.	Paragraph 4.206 needs to be amended to appropriately reflect the 2009 Harrow Retail Study's prediction that 38,912sqm net comparison and 5,261sqm net convenience floorspace by 2025, providing a total of 44,173sqm, and additional sites identified to meet this requirement.	Yes	The Council agrees that the retail figures in the AAP should be consistent with the retail figures quoted in the adopted Core Strategy – <b>see proposed minor modification no. AAP15</b>
17	103	RPS Planning on behalf of Person Pensions Property Fund	General comment	No	RPS also considers the AAP to be too vague as it does not state what amount of this retail provision is to be delivered on the allocated sites proposed in the AAP, and what mix of convenience and comparison goods is necessary to be provided. Therefore, it is considered that the AAP is inappropriate in determining suitable sites to meet the retail requirement for the Borough to 2026, as it is unclear whether this	For the AAP to be sound, it needs to states the amount of retail floorspace, both convenience and comparison, which is aimed to be delivered in the Harrow and Wealdstone AAP	Yes	The AAP, along with the Site Allocations DPD, allocates a range sites for retail/mixed use development sufficient to meet Harrow's retail needs over the short to medium term (2009-2020), and includes policies for meeting unmet needs in other accessible locations that are well connected to the town centres. As set out in the Retail Study, beyond 2020, longer term projections should be

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					<p>requirement can be met on allocated sites and existing commitments.</p> <p>Therefore, RPS recommends that the Council needs to consider other suitable and available sites to contribute towards this retail provision, to ensure that the future needs of the Borough are appropriately met.</p>	intensification area on the allocated sites proposed. This is so that it can be determined how much of the Borough's required retail floorspace can be accommodated on identified sites, to then appropriately consider additional sites to ensure this requirement can be met.		<p>treated with caution and should only be used as a broad guide, particularly when translated into the development plan allocations. Indicative retail floorspace figures for allocated retail/mixed use development sites within the Heart of Harrow are provided in the Retail Study, and are transposed in the AAP into the jobs target set for each sub area and allocated site. The Council considers the approach set out in the AAP to be the most appropriate. It responds to the current economic climate and to the issues affecting our high street as identified in the Portas Review, and provides a policy framework aimed at enabling the retail sector in particular to adapt and respond to market needs, for land use within centres to diversify, and to improve the urban environment, ensuring the town centres retain their vitality.</p> <p><b>No change</b></p>
17	104	RPS Planning on behalf of Person Pensions Property Fund	AAP17: Primary Shopping Areas and the Primary Shopping Frontage	No Not justified	<p>The policy states that major retail development will be focused on allocated sites identified in the Harrow and Wealdstone Area Action Plan (AAP) and Primary Shopping Area (PSA) of Harrow Town Centre. Outside of this area the policy proposes a sequential approach to development on other sites focused on secondary shopping frontages in the town centre, followed by other sites within the town centre boundary, then sites within the PSA of Wealdstone District Centre, followed by other sites within the District Centre boundary. These locations are to be considered before any other allocated sites in the Borough.</p> <p>Whilst RPS agrees with focusing development within Harrow Town Centre and the AAP area, to enhance the vitality and viability of the town centre, it should be recognised that a number of these sites and locations proposed for retail development will not come forward in the early or middle phases of the plan period.</p> <p>Therefore, it is considered important that the Council acknowledges additional sustainable sites in other areas to meet the Boroughs retail needs of 44,173sqm floorspace to 2026, and to support the predicted population increase of 26,000 people between 2008 and 2028 as the ONS Projections to 2033 suggest.</p> <p>The accommodation of this additional retail floorspace should include sites outside of District Centres following a sequential approach which could contribute towards the delivery of the required retail floorspace in the short term, such as the Northolt Road Retail Park.</p>	<p>The AAP should recognise that other sites outside of the AAP area and in addition to other allocated sites proposed are required to ensure the Boroughs retail needs can be fully met by 2026, in particular sustainable and accessible out-of-centre sites which are in existing retail use.</p> <p>Due to the uncertainty over the level of comparison or convenience floorspace that sites in the AAP can contribute to meeting retail floorspace needs, they should be discounted from the supply and treated as windfall sites.</p>	Yes	<p>The AAP, along with the Site Allocations DPD, allocates a range sites for retail/mixed use development sufficient to meet Harrow's retail needs over the short to medium term (2009-2020), and includes policies for meeting unmet needs in other accessible locations that are well connected to the town centres.</p> <p><b>No change</b></p> <p>The Council also considers that, of the sites allocated for retail in the AAP, there is a steady pipeline of delivery, with sites such as Neptune point delivering this year, Tesco and one site in Havelock Place next year, Lyon Road and Bradstowe House the year after, with Kodak proposed for the year after that. This is complimented by retail development across the remainder of the Borough including HoneyPot Lane and Stanmore Car Park.</p> <p>The Council is also content that the sequential approach outlined in the AAP and the Development Management Policies DPD will direct retail development to locate in the most appropriate town centres. Further, the sites in the AAP are allocated for retail use and therefore are not windfall sites.</p> <p><b>No change</b></p>

#### Respondent 18: The Environment Agency

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
18	105	Environment Agency	AAP9: Flood Risk and Sustainable Drainage, Part B	Yes	We are really pleased to see such a positive policy towards the management and reduction of flood risk in this Policy.	None	N/S	The Environment Agency's support for Part B of Policy AAP9: Flood Risk and Sustainable Drainage is welcomed and noted.
18	106	Environment Agency	AAP9: Flood Risk and Sustainable Drainage,	Yes	Part E is particularly good as this sets a strong position on the reduction and management of surface water run off and fluvial flooding and water pollution will contribute significantly towards meeting the Water Framework Directive objectives for the local water bodies.	None	N/S	The Environment Agency's support for Part E of Policy AAP9: Flood Risk and Sustainable Drainage is welcomed and noted.



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
			Part E					
18	107	Environment Agency	Paragraph 4.117 – 4.120	Yes	We are pleased that net flood risk reduction measures have been listed and described in further detail within the reasoned justification. These special measures will play an important role in ensuring that those developments within areas previously designated within Flood Zone 3b (functional floodplain) will meet stringent flood risk criteria to ensure that the development and site users will be kept safe and the area will benefit from positive reductions in flood risk in the area through the redevelopment.	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
18	108	Environment Agency	Site 5: Harrow and Wealdstone Car Park	Yes	The development proposed in the Key Site area 5 (Wealdstone Infills) includes a proposal for 'housing with mixed use commercial' adjacent to the existing railway line. This site, named 'Harrow and Wealdstone Station Car Park' in the Level 2 SFRA draft addendum has significant flood risk to the site. We would like to raise awareness that developers may find it difficult to meet the AAP9 Policies, DM Policies and the requirements of the NPPF on this site as it is heavily constrained by a large percentage of the site lying within your Flood Zone 3a and with over 2.2m depth of water on site.	None	N/S	The comments are noted. The Council will require any proposal for redevelopment of this site to be accompanied by a detail Flood Risk Assessment and will, in the course of pre-application discussions and/or determining any planning application for the site, liaise with the Agency to seek their advise and input to ensure the final development is both appropriate and addresses the significant flood risk identified for the site.
18	109	Environment Agency	Site 5: Harrow and Wealdstone Car Park	Yes	Key Site area 5 (Wealdstone Infills) includes a proposal for 'housing with mixed use commercial' adjacent to the existing railway line. This site, named 'Harrow and Wealdstone Station Car Park' in the Level 2 SFRA draft addendum has significant flood risk to the site. We would like to raise awareness that developers may find it difficult to meet the AAP9 Policies, DM Policies and the requirements of the NPPF on this site as it is heavily constrained by a large percentage of the site lying within your Flood Zone 3a and with over 2.2m depth of water on site.	None	N/S	The comments are noted. The Council will require any proposal for redevelopment of this site to be accompanied by a detail Flood Risk Assessment and will, in the course of pre-application discussions and/or determining any planning application for the site, liaise with the Agency to seek their advise and input to ensure the final development is both appropriate and addresses the significant flood risk identified for the site.

#### Respondent 19: Turley Associates

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
19	110	Turley Associates	Site 4: ColArt	Yes	In order to support the viable provision of education land for an extension to the Salvatorian College it would be appropriate for the key diagram to be modified to show the potential use of the land to the north of the site currently shown as community/education use to be more appropriately identified for education/community/residential uses and for this revised designation to overlap the southern part of the land parcel currently shown only for education use.	Modify the site diagram to show the potential use of the land to the north of the site, currently shown as community/education use, to be education/community/residential uses and for this revised designation to overlap the southern part of the land parcel currently shown only for education use.	N/S	The Council agrees and understands, following pre-application discussions, that the amount of land required by the College for expansion has now been confirmed and would propose to amend the site illustration diagram to reflect this, and on the basis that the education land is set aside to remove the community use designation and amend the text accordingly – <b>see proposed minor modification no. AAP22</b>
19	111	Turley Associates	Site 4: ColArt	Yes	The key diagram shows a 'key route' through land which cannot physically accommodate vehicles and pedestrians (third east-west route from the bottom). This alignment should be deleted and shown instead to replace that which is currently (fourth east-west route from the bottom) shown as a pedestrian only route. The north-south route linking the 'key routes' should also be shown as capable of accommodating circulation of all modes including pedestrians.	The key routes through the site require amending on the site diagram.	N/S	The Council agrees and acknowledges that, through pre-application discussions the key routes through the site had been amended and agreed but an error on the Council's part did not see these included in the site illustration in the Pre-Submission document – <b>see proposed minor modification no. AAP22</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
19	112	Turley Associates	Site 4: ColArt	Yes	It should also be noted that the former industrial buildings that sit behind the former office building are not physically or commercially capable of accommodating conversion to new or continued uses.	The reference to, and illustration showing, the possible retention of former industrial units, should be removed from the site diagram.	N/S	The Council agrees and acknowledges that, through pre-application discussions the possible retention of the industrial sheds been amended but an error on the Council's part did not see this amendment included in the site illustration in the Pre-Submission document – <b>see proposed minor modification no. AAP22.</b>

N/S – Not Specified

### Respondent 20: Transport for London Property Development

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
20	113	Transport for London Property Development	Site 19: Harrow on the Hill car park west  &  Site 21: Harrow on the Hill car park east	Yes	TfL has a number of landholdings within the spatial scope of the Document. These are referenced as follows:  Proposal Site 19: Harrow on the Hill car park west Proposal Site 21: Harrow on the Hill car park east  A copy of TfL land holdings relating to the above sites is attached for your reference.  Overall TfL Property welcomes 'in principle' the inclusion of TfL land within Proposal Sites 19 and 21 subject to London Underground Limited's need to safeguard operational activities associated with site 19 which includes staff car parking and train crew accommodation. In addition, to the north west of the site is a London Underground Limited substation to which access will need to be retained as part of any future development.	None	N/S	TfL Property's in principle support for the allocation of these two sites within the AAP is welcomed and noted. With regard to the need to safeguard operational activities associated with Site 19, and the need to retain access to the substation, the Council considers it appropriate that these requirement be added as a site constraint – <b>see proposed minor modification no AAP32</b>
20	114	Transport for London Property Development	Site 19: Harrow on the Hill car park west  &  Site 21: Harrow on the Hill car park east	Yes	TfL is currently producing Feasibility Studies for both sites which will inform the viability and deliverability of any future scheme brought forward. It should be noted that without the agreement from TfL Property to release the land for the proposed uses set out in sites 19 and 21, the designation as illustrated is undeliverable. However TfL Property is happy to work with the Borough and potential developers to realise the Boroughs vision for the sites set out in the Harrow and Wealdstone Area Action Plan.	None	N/S	The comments are noted, and the Council welcomes the opportunity to continue to work with TfL property to realise future redevelopment of these sites.
20	115	Transport for London Property Development	Site 19: Harrow on the Hill car park west  &  Site 21: Harrow on the Hill car park east	Yes	<b>Conclusion</b> TfL Property would welcome the opportunity to meet with the Borough to discuss the sites, current operational activity and their future development potential. Furthermore the delivery of any proposals for high quality developments can only be achieved through the support of planning policy. We suggest that the above points are considered to ensure the Pre Submission Harrow and Wealdstone Area Action Plan is 'sound' and policies are clear and robust.	None	N/S	The comments are noted, and the Council welcomes the opportunity to continue to work with TfL property to realise future redevelopment of these sites.

N/S – Not Specified

### Respondent 21: Sandra-Lee Palmer

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
21	116	Sandra-Lee Palmer	Site 2: Kodak	N/S	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.	Construct a comprehensive planning policy that protects <u>ALL</u> green open space for the present and future.	N/S	Harrow's adopted Core Strategy includes Policy CS1F which protects all existing open space (both public and private) from development. However, the Policy does allow for the reconfiguration of existing open space where this can improve access or quality without reducing the quantity of the open space. The development at Kodak accords to the latter by reconfiguring the open space currently on the former Zoom Leisure site and providing a new green corridor through both sites, linking Wealdstone town centre to Headstone Manor and beyond, without any net loss – in fact the Council notes that the scheme will result in a modest increase overall. <b>No change</b>

N/S – Not Specified

## Respondent 22: English Heritage

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
22	117	English Heritage	Figure 1.1: Heart of Harrow Area Action Plan Location	Yes	It is not clear why opportunity site 1 and 20 are coloured a dark brown, as oppose to burnt red (as used for the other opportunity sites). The adjoining key does not include dark brown in its list of details.	Amend the key to clarify what the dark brown coloured sites are.	N/S	The dark brown colour is a result of the underlying green Metropolitan Open Space designation overlaid with the burnt red Opportunity Site designation. This is a cartographic issue with the over-layering of the different designations. The Council will look at options for overcoming this anomaly – <b>see proposed minor modification no. AAP1</b>
22	118	English Heritage	Paragraph 3.9, Objective 1	Yes	We would suggest that the Objectives of the AAP should be expanded to include a reference to conserving the areas heritage assets and wider historic environment. This could be expressed by using the Borough's characterisation study and other historical analysis as a basis in which to inform new exemplary design. The objective could then be to deliver developments that build upon and enhance the areas local and historic context, thus reflecting its diversity, with the purpose of achieving high quality design. This approach would reflect the NPPF (para's 58 and 126).	Amend Objective 1 to include a reference to conserving the areas heritage assets and wider historic environment.	N/S	The adopted Harrow Core Strategy divides the Borough into 9 sub areas, with Harrow and Wealdstone forming one such area. In addition to establishing the strategic borough-wide objectives, the first of which includes the protection of the historical and environmental features that contribute to Harrow's character and distinctiveness as a place to live, work and visit, the adopted Core Strategy also sets out the strategic objectives for each sub area. The AAP simply transposes these objectives, and having already been the subject of examination in public, the Council considers these objectives to be sound without further amendment. <b>No change</b>
22	119	English Heritage	Paragraphs 3.13 and 3.18	Yes	In both paragraphs encouragement is given to the development of tall buildings. It would be useful to get further clarity on what is meant by a tall 'landmark' building in the Heart of Harrow (para 3.13) and 'a limited number of tall and/or taller buildings' in Harrow town centre and Wealdstone (para 3.18). For example it is not clear from the text on the exact location and potential acceptable height levels of tall buildings in these broad areas. We are concerned that unless further clarity is provided proposals for tall buildings could cause harm to the historic environment, contrary to the Core Strategy and NPPF.	Provide further clarity by taller and tall landmark buildings.	N/S	Policy AAP6: Development Height provides the definitions for both 'taller' and 'tall landmark' buildings. These are also to be defined in the Glossary – see proposed modification no. AAP35 and 37. Policy AAP6 also establishes the policy framework against which the acceptability of taller or tall landmark building proposals will be determined. The Council does not consider it necessary to repeat these details in the section of the AAP that deals with the role of the AAP in fulfilling to Core Strategy's vision and spatial strategy. <b>No change</b>
22	120	English Heritage	Policy AAP1: Development within Harrow Town Centre	Yes	We would encourage the Council to include a bullet point within section A of the policy to address the need for developments to conserve and enhance the significance of heritage assets, including their settings, especially the existing setting of St Mary's Church and Harrow-on-the-Hill. At present the policy wording falls short of recognising the need to protect these key heritage features that help define the context of Harrow Town Centre. We note that the AAP includes policy AAP8: Enhancing the Setting of Harrow Hill, however there is a lack of connection between these policies.	Include a bullet point within section A of the policy to address the need for developments to conserve and enhance the significance of heritage assets, including their settings, especially the existing setting of St Mary's Church and Harrow-on-the-Hill	N/S	The first three policies of the AAP deal with issues specific to the different sub areas within the Heart of Harrow. Matters relevant to all are not included in these policies but rather are dealt with in the preceding relevant topic based policies. With regard to the need for developments to conserve and enhance the significance of heritage assets, including their settings, these are appropriately dealt with in Policy AAP4: Achieving a High Standard of Design of Development throughout the Heart of Harrow, Part A(b) and Policy AAP8: Enhancing the Setting of Harrow Hill. The Council does not consider there to be any disconnect between the policies.

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
								<b>No change</b>
22	121	English Heritage	Policy AAP6: Development Height	Yes	Reflective of our previous comments to the Preferred Option, we would suggest that the wording of the policy should be amended so that it mirrors closely the NPPF, in terms of conserving the historic environment.	AAP6 where reference is made to the protection and preservation of the historic character (Part C b. and Part E g.). We would advise that this should be expressed as 'conservation and enhancement of the significance of heritage assets and the wider historic environment'	N/S	The Council agrees that the wording of the policy should mirror closely to that of the NPPF – <b>see proposed minor modification no AAP6 and AAP8.</b>
22	122	English Heritage	Policy AAP6: Development Height	Yes	Reflective of our previous comments to the Preferred Option, we would suggest that the wording of the policy should be amended so that it mirrors closely the NPPF, in terms of conserving the historic environment.	In addition Part G of policy AAP6 could be expanded so that applicants are required to undertake both urban design analysis and heritage assessment, so ensuring the significance of heritage assets are understood and appropriately conserve in the light of tall building proposals.	N/S	The Council considers, and would expect, heritage assets to be identified and assessed as part of a comprehensive urban design analysis, and would not expect the assessment of any potential impacts upon the historic environment to be divorced to a separate assessment. <b>No change</b>
22	123	English Heritage	Policy AAP5: Density and Use of Development & Policy AAP6: Development Height	Yes	In the case of both AAP5 and AAP6, the wording of these policies do not consider the potential of high density developments or tall buildings being designed so that they help enhance the significance of heritage assets. Nor do the policies consider the possibility of existing buildings being removed so that the significance of heritage assets is better revealed. We would suggest that these possible scenarios are addressed and expressed in the two policies.	Amend the policies to provide for the potential for:  high density developments or tall buildings to be designed help enhance the significance of heritage assets; or  removal of existing buildings to better reveal the significance of a heritage asset.	N/S	As stated at paragraph 2.29, there are only eight listed building in the whole of the Heart of Harrow area. With the exception of Headstone Manor and development of the adjacent Zoom Leisure Site – which the Council considers is appropriately addressed in the site specific guidance to Site 1 & 2 – the Council does not consider that development within the Heart of Harrow would presents such potential opportunities that would warrant inclusion of such wording within the policies. Further, the Council would argue that, were such a potential to arise, this could be adequately addressed through the appropriate application of Policy AAP4: Achieving a High Standard of Development throughout the Heart of Harrow, Part A(b). <b>No change</b>
22	124	English Heritage	Chapter 5: Sub Area and Site Specific Guidance	Yes	Reflective of our comments to the Site Allocations DPD we would suggest that for each site map the proximity of heritage assets should be shown. In addition we would encourage you, as part of demonstrating a positive strategy for the conservation of the historic environment (NPPF para 126) that the significance of all relevant heritage assets are summarised, and expressed in the 'site constraints/dependencies' section. For example if a site falls within or is adjacent to a conservation area, the relevant headline details of the conservation area appraisal and management plan should be raised then used to inform the 'design considerations'. This approach would help ensure that the significance of the conservation area is understood and used to inform how the site could be developed.	For each site map the proximity of heritage assets should be shown and the significance of all relevant heritage assets be summarised and expressed in the 'site constraints /dependencies' section.	N/S	The Council agrees that this would be a useful addition to each site map. While the majority of the site allocations list the relevant heritage assets, this is not true of all of the sites, and the Council also agrees that this anomaly should be addressed – <b>see minor modification no. AAP23, AAP25 and AAP26</b>
22	125	English Heritage	Sub Area: Wealdstone West -	Yes	As raised in our previous letter, English Heritage commented upon the current Outline Planning Application for the redevelopment of the Kodak Site. In that response we raised concerns regarding the impact of the proposed development upon the setting of Headstone Manor (listed grade I) and its site as a Scheduled Monument within a complex of grade II* and grade II listed buildings. We raised the need for this collection of heritage assets to be appropriately protected through a robust policy framework so that the significance of the assets including their settings are not harmed through inappropriate	Suggested that one of the key considerations for the Wealdstone West sub area (para 3.6.2) should be that Headstone Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage	N/S	The Council agrees but considers that this is best included as a key sub area objective for the Wealdstone West sub area – <b>see proposed minor modification no AAP20</b>  With regard to Site 2: Kodak and Zoom Leisure, it should be noted that the site illustration and text were amended to reflect the fact that the outline planning application for this site has been approved.

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					<p>development. We suggested that one of the key considerations for the Wealdstone West sub area (para 3.6.2) should be that Headstone Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage assets. This would be achieved through thorough analysis of all the heritage assets, their significance and the contribution the setting makes to their significance. This includes assessing the assets individually and collectively. This approach is line with the NPPF and English Heritage's The Setting of Heritage Assets guidance (2011). It is noted that the sub-area site specific guidance (i.e. Site 1: Headstone Manor and environs, and Site 2: Kodak and Zoom Leisure) seek to address these issues. However the details provided in this part of the AAP are still not sufficiently robust to conserve the significance of the Headstone Manor complex and its various settings. For example the illustrations, supported by the text, promote development on land east of the Headstone Manor complex. It is noted that a viewing corridor is proposed, but we are still concerned that the significance of the Headstone Manor complex, as provided by its setting, could be harmed by the proximity and form of the development proposed. We therefore would urge you to address this concern and introduce additional clarity on how developments with the setting of Headstone Manor will address its significance.</p> <p>Finally we would encourage you to state clearly in the text that the Council will use the opportunity of using S106 funding resulting from the redevelopment of the Kodak site to help conserve and enhance Headstone Manor. This includes cross funding the long term future of the historic site and its setting.</p>	assets.		

N/S – Not Specified



## Schedule of Representations to the Pre-Submission Heart of Harrow AAP by Document Order

### Whole document

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
1	001	Hertsmere Borough Council	Whole DPD	Yes	We have no comments to make in relation to the policies proposed in the Harrow and Wealdstone Area Action Plan.	None	Yes	The Council notes that the Borough Council has no comments to make in relation to the AAP policies.
2	002	Cllr O'Dell	Whole DPD	N/S	I object to preferred option for the Heart of Harrow. Including Station Road in the plan will only eventually lead to the one centre option with Wealdstone losing its distinct character as identified in the original document. This would severely impose a loss of amenity to my constituents.	N/S	N/S	The LDF Panel, at its meeting of 26 July 2011, considered the representations and the analysis of responses received to the AAP Issues and Options consultation and endorsed the officer recommendation that the preparation of the Council's preferred option for the AAP be based upon the support received to strategic spatial development Option 4 but having regard also to the comments and considerable support received to Option 3. Feedback from the representations was clearly in favour of the inclusion of Station Road. The AAP Preferred Option document was then approved by full Council on 15 December 2011 and subject to public consultation from 12 January to 23 February 2012. With the exception of this consultee, no other representations were received that objected to the overall spatial strategy the Council had set out in the AAP Preferred Option. Rather, numerous comments were made in support of the inclusion of Station Road. Based on this majority positive view of the benefits to be achieved through the inclusion of Station Road within the AAP, the Plan has been developed on that basis. <b>No change</b>
5	011	Greater London Authority	Whole DPD	Yes	It is my opinion that the proposed submission document is in general conformity with the London Plan. However, please note that the abovementioned report and appendix include representations which seek to clarify or improve policy with the consultation document.	None	Yes	The Council welcomes the Mayor's confirmation that the AAP is in general conformity with the London Plan, and thanks the GLA for their further comments as well as their continued engagement in the production of the AAP. Post adoption, the Council looks forward to continuing this positive relationship into the implementation phase.
6	036	Natural England	Whole DPD	Yes	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.  Overall Natural England is satisfied with the document, it covers the areas and issues of interest to Natural England. The approach includes aspects of social, economic and environmental policies to assist in delivery of sustainable development. Delivery does not seem inappropriate subject to schemes being brought forward.  Policies and approach also seem to be in general compliance with the London Plan and National Planning Policy Framework, again providing opportunities under environmental, social and economic headings.  Subject to the above Natural England does not wish to offer any further substantive comments.	None	Yes	The Council notes that Natural England is satisfied with the AAP and has no substantive comments it wishes to make.
7	037	Three Rivers District Council	Whole DPD	Yes	Three Rivers District Council have no comment to make in relation to the proposed submission documents.	None	Yes	The Council notes that the District Council has no comments to make in relation to the AAP policies.

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
9	053	Irene Wears on behalf of Campaign for a Better Harrow Environment	Whole DPD	Yes	<b>Town centre cultural/leisure facilities</b> - As before the Plan is peppered with general references to public space/realm, active ground floor uses, mixed uses, and leisure/cultural/entertainment activities. The only firm statement relates to the proposed siting of the new Central library in College Road. We believe that the Plan should state what facilities it is intended to provide and (provisionally) where they would be located.	The Plan should state what facilities it is intended to provide and (provisionally) where they would be located.	N/S	The facilities / infrastructure intended to be provided through the AAP are set out in the Infrastructure Schedule on page 178, which also sets out the site or sub area within which each is to be located. Within Chapter 5, each sub area has a heading 'Infrastructure' which reiterate these requirements and the relevant site allocations include references to these facilities either in the land use description or in the site specific infrastructure. <b>No change</b>
9	054	Irene Wears on behalf of Campaign for a Better Harrow Environment	Whole DPD	Yes	<b>Town centre cultural/leisure facilities</b> - The effects of the recession which shows no sign of improving in the short to medium term, coupled with changing shopping patterns mean that we are probably destined to lose more of the most vulnerable town centre retailers. The plan acknowledges all of this, along with the Portas Review whose recommendations include community use of empty properties (see page 187). The Council is prepared to try this and it may work to some extent. However we still need to do much more to make Harrow an attractive and vibrant place to live/visit. Only then can we expect the key retailers to stay in Harrow so that residents spend their leisure time here and more visitors are attracted to the town. So along with restaurants and hotels etc, we need more things to attract people to the town centre. The careful identification and planning of this is central to the renewal of the town and its continued status as one of London's Metropolitan Centres. It should not be left to chance.  Features like a good town market and extras like an open air roller skating rink with seasonal ice skating and Christmas stalls would bring people into the town centre. The plan to have a performance area in Lowlands Recreation ground is noted but that is slightly off the shoppers' route and is obviously a fair weather venue. Ideally we need a town centre indoor performance space. An exhibition space would also be very valuable. Harrow has innumerable artists and craftsmen ready to display their skills and their wares. And local archaeological, astronomy, geological and historical societies could provide interesting exhibitions.  Understandably envious eyes are being cast towards modern retail centres like Ealing and Uxbridge. However changing shopping habits coupled with the effects of the recession mean that the future of such places must be uncertain. Harrow has a unique opportunity at this time to take the lead in creating a town centre that reflects the changing trends.	Need to identify and plan for more things to attract people to the town centre.	N/S	AAP7 is about creating a quality new public realm within the town centre. Part D of the policy requires that this be designed carefully to accommodate and strengthen pedestrian and cycle links but also to enhance social use of such space, ensuring it is flexible in its function. In particular, as set out in Part B, there are a number of key new public spaces that are to be created or enhanced including the Junction Road underpass, the square at St John and Lyon roads, St Ann's Road, as well as on the development sites for 17-51 College Road (site 18) and the Greenhill way car park (site 13). Careful design will enable these spaces to be used for a variety of activities including markets, stalls, and potentially ice skating etc. The provision of new civic space at 17-51 College Road (site 18) and Greenhill way car park (site 13), will complement proposals for community facilities on these sites which, again, if designed well could incorporate uses that could make use of both in-door and out-door spaces. However, it is outside the scope of the AAP to prescribe the activities that should take place within these newly created spaces. Such decisions are a management matter. Rather the role and function of the AAP is to ensure such spaces are created and designed to allow a range of activities to take place. The Council considers the above provisions set out in the AAP achieve this. With regard to ensuring the built form of the town centre remains flexible to respond to changing trends, Policy AAP1 ensures new development within the town centre provides for a mix of town centre uses; active ground floor uses; and buildings are adaptable at ground and first floor building forms to respond to changing retail / town centre trends. Further, Policy AAP17 sets thresholds for non-retail use at street level in the primary shopping frontage but also provides for an exception to these where it can be demonstrated that the proposal will make a significant contribution to the vitality and viability of the town centre. <b>No change</b>

## General Comments

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
9	039	Irene Wears on behalf of Campaign for a Better Harrow Environment	General comment	Yes	Whilst we understand the need to keep the documents to a manageable size, it is unfortunate that most of the maps/diagrams are very difficult to use because they are so small. The problem is made worse by the use of a tiny font which is often superimposed on coloured or patterned backgrounds. The map on page 156 of the AAP is just one example of this. Not everyone is able to view the documents on line and, in so doing, to enlarge the images.	Maps and Diagrams should be larger	N/S	The Council does try and ensure all maps and diagrams are legible whilst trying also to keep the document to a reasonable size, both for publishing in hard and on-line versions. At draft stages the quality of the images is limited by the internal graphics expertise by our publishing software. The cost involved in getting professional publishing expertise makes this prohibitive at draft stages. However, as set out in the Statement of Community Involvement, if people do have problems viewing the images or text, the Council can make larger print copies of the document or specific images available upon

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
								request. <b>No change</b>
9	040	Irene Wears on behalf of Campaign for a Better Harrow Environment	General comment	Yes	In Appendix C of the AAP document (Making Representations), one purpose of the examination is said to be to consider whether the DPD is "sound". Soundness is discussed on page 211 where it is stated that the plan should be consistent with achieving sustainable development and that "the DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved". The Bruntland definition of sustainable development, which, we understand is still being used as the standard, is considered by professionals to be far too woolly. There are no numbers, only warm words. Defra is currently running a consultation seeking comments on a new set of indicators i.e. statistics on various aspects for Sustainable Development in Government. The nine headline indicators and 25 supplementary indicators are grouped under economy, society and environment. It is to be hoped that a more rigorous set of indicators will be set up to replace the inadequate Bruntland definition and that they will be used wisely in formulating policy.	None	N/S	The comments regarding Defra's consultation on new national indicators for sustainable development are noted. In the context of Harrow's local plan, the spatial strategy set out in the Core Strategy broadly defines what constitutes sustainable development in the borough, and was the subject a detailed sustainability appraisal, taking account of the likely social, environmental and economic impacts of the plans objectives and all reasonable alternatives considered. The AAP gives effect to the spatial strategy and has also be subject to the same rigour of sustainability appraisal.
9	059	Irene Wears on behalf of Campaign for a Better Harrow Environment	General comment	Yes	<b>Protection for existing residents</b> - We note that the Plan recognises the need for a transitional boundary between town centre development and neighbouring residential areas in Harrow Town Centre East (Key sub area objective 1). It nowhere states how this might be achieved. We suggest that this is something which will need to be built into the planning applications for large developments here and elsewhere in order to minimise the effects on quality of life due to increased noise, traffic congestion, loss of privacy, loss of sunlight etc. Site 23 (Gayton Road) is an example of a development area that could have a deleterious effects on properties in Ashburnham Avenue.	None	N/S	The Council agrees that this is best addressed through the case by case consideration of a planning applications as the appropriate transitional arrangements are likely to differ significantly between sites and proposals, and will depend on the site circumstances, the neighbouring site(s) context and the proposal, including scale, mass, layout etc. The Council considers the policies of the AAP to be comprehensive, and thereby enable the consideration of such matters in respect of transitional boundary issues. <b>No change</b>
9	060	Irene Wears on behalf of Campaign for a Better Harrow Environment	General comment	Yes	<b>Protection for existing residents</b> - In addition, it is the case that large parts of the Intensification Area are set to become building sites for long periods over the next 12-15 years. As new developments are being built and brought on stream, there will be knock-on effects on footways, roads, bus routes etc. The whole regeneration process needs be managed sensitively for the sake of the people who use Harrow, particularly those who live there. This fact is not recognised in the Plan. We suggest that there should be an information campaign covering each major site as it starts to be developed. This could comprise road signs that apologise for inconvenience/explain what is happening; information at the sites and on local advertising hoardings to show progress and the finished product; illustrated articles in local newspapers; scale models on line and on show in local places so that people can see what is going on.	None	N/S	The Council expects the impacts of the construction of a new development to be contained within the curtilage of the development site and potential nuisance mitigated. The Council operates a Considerate Contractor Scheme, whereby contractors are encouraged to follow a Code of Practice to minimise nuisance during construction. Where construction activities impact or affect footways, roads, bus routes etc these are addressed under the Highways Act.  However, the Council agrees that the AAP should say more on the project management of the implementation of the AAP. Beyond the consideration of individual site proposals, and the management of these through the planning application process, the Council recognises there is a need to acknowledge that the AAP represents circa £1b in development and investment in the Heart of Harrow over a 15 year period, and therefore requires the Council to take responsibility for overseeing and managing the Plan's implementation and delivery across the area as a whole. The Council is in the process of developing an inward investment and marketing strategy – both to advertise the investment and development opportunities within the Heart of Harrow to commercial interests outside of the Borough and to communicate the delivery of the AAP. Its purpose will be to highlight the progress being made, recent successes, individual site marketing material, including illustrations and models; statistics, and to advertise events and key

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
								topics of interest. Two examples the Council are following are Opportunity Enfield: <a href="http://www.opportunityenfield.com">http://www.opportunityenfield.com</a> and Invest Ilford <a href="http://www.investilford.co.uk/home.aspx">http://www.investilford.co.uk/home.aspx</a> ) - <b>see proposed minor modification no. AAP34</b>
14	084	Christopher Langley	General comment	Yes	Despite serious shortcomings in content, the writer of this document should at least be complimented on improving its structure, and for once, giving a succinct explanation of how Harrow Planning Department see the issues and their proposals is written. Should such a professional presentation have been adopted earlier, the public response to its contents may well have resulted in a proper debate.	None	N/S	While the Council notes the comments, it is typical that as plans are prepared, they are refined and more detail added at each stage as greater clarity emerges about the final product.
14	085	Christopher Langley	General comment	N/S	The document highlights the lack of joined up thinking in the Council and, despite Harrows excellent communication links, selective opportunities for growth and employment, fails to map an objective for Harrow's development of which the building of 3000 dwellings will have a major impact. There is no business plan.	N/S	N/S	The Council disagrees and considers the AAP represents a blueprint for the comprehensive and coordinated regeneration of the whole of the Heart of Harrow. The allocations identified are not selective but represent available and deliverable sites. <b>No change</b>  With regard to a business plan, the responsibilities of the Council in project managing the implementation of the AAP are to be included in a proposed minor modification to Chapter 6: Delivery, Implementation and Monitoring – <b>see proposed minor modification no. AAP34</b>
14	087	Christopher Langley	General comment	N/S	The document fails to financially quantify any of the proposals including council tax income, the extra cost to the Borough in education, social workers and policing or reflect or present the continuing changes in UK, Harrow Town Centre or District retailing despite several Government, the Mayor of London's report on the subject and, major retailers statements and well known local problems.	None	N/S	The evidence base in support of the Harrow Core Strategy and the Area Action Plan is comprehensive and, with the exception of Council tax income, cover all of the other matters listed. These have been used to inform the proposals and policies of the local plan and, where relevant, are cross-referenced in the local plan documents. All evidence base studies are made available to view and download on the Council's website. No change
14	088	Christopher Langley	General comment	N/S	The fact that Harrow Town Centre is, in the words of the author, a mess architecturally is an own goal. There is no input from the Town Manager or recognition of the importance of making Harrow different to or building on the success of others and especially, how others see Harrow.	None	N/S	In the course of preparing the AAP, the Council met several times with the Harrow Town Centre Form, which includes the town centre managers for St. Ann's and St. George's shopping centre's as well as representatives for the broader retail and commercial interests of the town centre. The consultation confirmed that there is no appetite to make Harrow town centre different. This is also borne out in Experian data on the relative strengths of town centres across the UK and the South East which shows Harrow Town Centre remains one of the more buoyant against a fairly bleak economic picture for retail and town centres generally. The strategy set out in the AAP therefore responds to this by seeking make provision for new retail development to maintain Harrow town centre's market share, whilst at the same time, it takes on board many of the recommendations of the recent Mary Portas review, with respect to improving the overall quality of the town centre environment, making provision to enable a diversification of town centre uses, and ensuring new development is able to adapted to better respond to changing circumstances. The Council therefore considers the strategy set out in the AAP is the most appropriate. <b>No change</b>

## Chapter 1: Introduction

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	012	Greater London Authority	Figure 1.1 Heart of Harrow AAP location	Yes	General comment - For ease of reference, the Council is invited to include the town centre boundaries for Harrow metropolitan town centre and Wealdstone district centre on this diagram, as well as Metropolitan Open Land, open space, opportunity sites, and the intensification area boundary.	Include the town centre boundaries in the diagram of Figure 1.1	Yes	The Council agrees that it would be useful to show the town centre boundaries in Figure 1.1 and will consider how this may be best achieved to ensure the Figure remains legible – <b>see proposed minor modification no. AAP1</b>
22	117	English Heritage	Figure 1.1: Heart of Harrow Area Action Plan Location	Yes	It is not clear why opportunity site 1 and 20 are coloured a dark brown, as oppose to burnt red (as used for the other opportunity sites). The adjoining key does not include dark brown in its list of details.	Amend the key to clarify what the dark brown coloured sites are.	N/S	The dark brown colour is a result of the underlying green Metropolitan Open Space designation overlaid with the burnt red Opportunity Site designation. This is a cartographic issue with the over-layering of the different designations. The Council will look at options for overcoming this anomaly – <b>see proposed minor modification no. AAP1</b>

## Chapter 2: Context, Issues, Challenges and Opportunities

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
9	041	Irene Wears on behalf of Campaign for a Better Harrow Environment	Paragraph 2.27 – 2.29	Yes	We note with approval the following new material in the Area Action Plan:  a) the new section on Urban Character and Infrastructure paras (2.27-2.29) which recognises the challenge in managing the relationship between the borough's "historic assets and new high quality, contemporary development within the Heart of Harrow	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
9	044	Irene Wears on behalf of Campaign for a Better Harrow Environment	Paragraph 2.40	Yes	On para 2.40 (Station Road), we welcome the adoption of a boulevard concept for this key artery. For traffic management purposes it would be worth looking at Ilford lane between Ilford and Barking, a major corridor between two town centres. There have been radical enhancements in pedestrian, cycle and bus circulation achieved by re-design of the highway layout, allowing efficient, rapid-transit style bus operations whilst retaining access and parking for shops and other frontages.	None	N/S	It is always useful to know of examples where transformation / public realm works have been undertaken that members of the community considers represents good design that could be applicable to a Harrow situation. The Council will take up the suggestion of the Campaign for a Better Harrow Environment to visit the Ilford Lane to see an example of how Station Road may be successfully re-designed.
10	061	CBRE on behalf of Dandara Ltd	Chapter 2	N/S	This Chapter provides a general overview of the current situation across the AAP area and the Intensification Area identified within the London Plan 2011 and the broad strategy going forward. Paragraph 2.45 identifies the specific challenges of the town centre and identifies some of the key requirements that will be necessary to achieve the uplift sought. However, these are relatively small piecemeal responses to what is a broader underlying challenge and nowhere does the Chapter identify a specific role for the Council in delivering improvements beyond the policies of the AAP itself.  Achieving the objectives and potential for the AAP as set out in the policy framework will require the Council to take a proactive approach and it must take on a leadership responsibility driving forward the policies and objectives of the plan recognising that, at times, it will need to be robust in its decision making and arguably make unpopular or controversial decisions.	Our client believes that the Council needs to explicitly state and should commit itself, within the Plan to "...take a robust and bold leadership role in bringing the Town Centre forward if its potential is to be realised and if it is to maintain its role, function and attract inward investment".	N/S	The responsibilities of the Council in project managing the implementation of the AAP are to be included in a proposed minor modification to Chapter 6: Delivery, Implementation and Monitoring – <b>see proposed minor modification no. AAP34</b>  However, the Council queries why the respondent considers it probable that the Council will need to make unpopular or controversial decisions? The Council would argue that such hard decisions have been addressed in the course of preparing the AAP, and that, in approving the Pre-submission document for consultation and submission to the Secretary of State, the Council has confirmed its commitment to the growth and development of the Heart of Harrow in the form prescribed therein. In doing so, the Council has embraced the plan-led system, and will welcome and support applications that accord with the Core Strategy and the AAP, and that help to deliver the spatial vision and strategic objectives for the Heart of Harrow. <b>No change</b>
11	077	Louise Leadbeater - Roxborough Residents	Paragraph 2.23	N/S	We would suggest that the provision of 2,800 additional homes and the increase of over 4,000 residents cannot be justified until a more robust analysis of traffic flows is carried out, as stated in para 2.23	A more robust analysis of traffic flows needs to be undertaken	N/S	The traffic impact assessment for the AAP was itself a refinement of the Borough-wide transport audit undertaken to inform the Core Strategy. While both studies confirm there are existing capacity



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
		Association						issues at a number of junctions that will come under more stress as a result of the planned growth, neither identified any 'show-stoppers' – with the latter showing that measures could be implemented to mitigate growth impacts. The Council is satisfied that both studies were appropriate in detail to understand the cumulative impacts of forecast growth on traffic flows. While more detailed studies would be beneficial, there are budget constraints that unfortunately do limit the evidence gathered to that necessary to satisfactorily underpin the growth strategy and development quantum therein. <b>No change</b>

### Chapter 3: Vision and Spatial Strategy

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
3	005	Anne Swinson Hatch End Association	Chapter 3: Vision and Spatial Strategy, paragraph 3.4/3.5	N/S	Was the quality of schools in the 21st century intentionally omitted?	N/S	N/S	The Council agrees that the borough schools are a valued and essential element of 21 <sup>st</sup> Century Metro-land and should be referenced in paragraph 3.5 – <b>see proposed minor modification no. AAP2</b>
9	045	Irene Wears on behalf of Campaign for a Better Harrow Environment	Paragraph 3.14	Yes	Para 3.14 refers to Wealdstone as a focus for growth as well as regeneration and refers to the objective of creating “an east-west link across the area, improving connections between Headstone Manor, Kodak, the District Centre and the Leisure centre”. Much as we welcome this, we question the feasibility of the dramatic improvement required, including a new crossing of the West Coast Main Line railway (even if only for pedestrians and cyclists). We feel there is a risk of this becoming an unachievable aspiration, as the severance caused by the railway line will seriously inhibit the success of the Land Securities development of the Kodak site. This will create greater pressure on the exiting road network to the west including the Headstone Drive/ Harrow View junction mentioned above.	None	N/S	The AAP retains the proposal for bridge/underpass providing a new pedestrian and cycle connection across the railway line to connect the Kodak site with the proposal for a new secondary school on the Teachers Centre site. While evidence show that delivery of this enhanced connection is not currently viable as part of the Kodak development, the Council considers the potential for possible delivery should be retained should this prove viable at some time in the future. It should be noted that the transport impacts associated with the Kodak development have been assessed in detail in the course of the grant of the outline planning permission and there is no evidence to suggest that the absence of this additional connection across the railway line will seriously inhibit the success of the Kodak re-development or result in greater pressure on the existing road network, than that already identified in Kodak's transport assessment and mitigated against through the s106 agreement, including enhancements to the existing underpass, site access arrangements, and the Headstone Drive / Harrow View Junction. <b>No change</b>
14	086	Christopher Langley	Chapter 3, AAP Objective 7	N/S	The documents insistence that now 3000 and not the original forecast of 2500 jobs will be created, is pure fiction and there is no reference to how such an aspiration could have been calculated or will be achieved. Also missing are any statements on the considerable reduced semi and unskilled skilled employment opportunity in Wealdstone and locally. Its impact on social cohesion for the housing proposals and the new skill mix required to meet the needs of employers locally and within commuting distance and how the new build will attract such residents as part of Harrow's inward investment program. Social housing starts, approved by Harrow Planning since the start of the consolation process in 1998 and included in the current issue, are an eyesore, adding to the many other examples of poor architectural design approved by Harrow Planning. Such	None	N/S	The jobs figure for the Heart of Harrow has always been quoted as 3,000, as confirmed in the Preferred Option (November 2010), the Pre-submission (April 2011) and adopted versions of the Core Strategy (February 2012) (see page 40 of the adopted Core Strategy). The jobs figure is derived from the Employment Land Review (2010) and confirmed through development scenario testing undertaken by consultants GVA as part of the site capacity analysis. With regard to semi and unskilled employment opportunities, the AAP makes provision for a wide range of employment accommodation, tailored to better meet local needs and opportunities. Overall, the Council also considers the AAP establishes robust policies to significantly improve the design quality of new development within the Heart of Harrow (see Policy AAP4:

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					buildings now resplendent with satellite dishes pock marking every orifice, to compliment other buildings, temporary fencing placed on balconies to hide the washing and having no regard to the local architecture add to the doom and gloom of the locality.			Achieving a High Standard of Development throughout the Heart of Harrow, in particular). Matters such as the visual blight caused by satellite dishes are included in the Residential Design SPD which is referenced in Policy AAP13: Housing within the Heart of Harrow, part B, although it should be noted that certain allowances are made by Government as of right as permitted development. However, there are no such constraints to building / site management companies or body corporations controlling and enforcing against such visual amenity impacts. <b>No change</b>
22	118	English Heritage	Paragraph 3.9, Objective 1	Yes	We would suggest that the Objectives of the AAP should be expanded to include a reference to conserving the areas heritage assets and wider historic environment. This could be expressed by using the Borough's characterisation study and other historical analysis as a basis in which to inform new exemplary design. The objective could then be to deliver developments that build upon and enhance the areas local and historic context, thus reflecting its diversity, with the purpose of achieving high quality design. This approach would reflect the NPPF (para's 58 and 126).	Amend Objective 1 to include a reference to conserving the areas heritage assets and wider historic environment.	N/S	The adopted Harrow Core Strategy divides the Borough into 9 sub areas, with Harrow and Wealdstone forming one such area. In addition to establishing the strategic borough-wide objectives, the first of which includes the protection of the historical and environmental features that contribute to Harrow's character and distinctiveness as a place to live, work and visit, the adopted Core Strategy also sets out the strategic objectives for each sub area. The AAP simply transposes these objectives, and having already been the subject of examination in public, the Council considers these objectives to be sound without further amendment. <b>No change</b>
22	119	English Heritage	Paragraphs 3.13 and 3.18	Yes	In both paragraphs encouragement is given to the development of tall buildings. It would be useful to get further clarity on what is meant by a tall 'landmark' building in the Heart of Harrow (para 3.13) and 'a limited number of tall and/or taller buildings' in Harrow town centre and Wealdstone (para 3.18). For example it is not clear from the text on the exact location and potential acceptable height levels of tall buildings in these broad areas. We are concerned that unless further clarity is provided proposals for tall buildings could cause harm to the historic environment, contrary to the Core Strategy and NPPF.	Provide further clarity by taller and tall landmark buildings.	N/S	Policy AAP6: Development Height provides the definitions for both 'taller' and 'tall landmark' buildings. These are also to be defined in the Glossary – see proposed modification no. AAP35 and 37. Policy AAP6 also establishes the policy framework against which the acceptability of taller or tall landmark building proposals will be determined. The Council does not consider it necessary to repeat these details in the section of the AAP that deals with the role of the AAP in fulfilling to Core Strategy's vision and spatial strategy. <b>No change</b>

#### Chapter 4: Heart of Harrow Policies

##### Policy AAP1: Development within Harrow town centre

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
3	006	Anne Swinson Hatch End Association	Policy AAP1: Development within Harrow town centre, Part A/g	N/S	Error	Final word "overtime" should read "over time".	N/S	Agreed, error needs correcting – <b>see proposed minor modification no. AAP3</b>
9	042	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP1: Development within Harrow Town Centre, Part H and paragraph 4.3	Yes	We note with approval the following new material in the Area Action Plan:  b) the material on the re-establishment of a network of walkways through sites (policy AAP1 h.)  d) the new material on building design (para 4.3, first indent) is reassuring. A number of issues will need to be addressed, including the use of non-reflective glass, especially for taller buildings, to reduce reflected glare.	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
10	062	CBRE on behalf of	Policy AAP1:	N/S	This policy sets out the broad Character and Amenity criteria for	Within the policy and/or the	N/S	The Council disagrees and considers such change unnecessary on

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
		Dandara Ltd	Development within Harrow Town Centre		promoting development within Harrow town centre. This policy fails to acknowledge Core Strategy Policy CS2 J or CS Paragraph 5.15 in respect to the fact that the town centre is the location to identify sites for taller and landmark buildings. Whilst it is accepted that there is later policy within the AAP dealing with development height the same is also true in respect to the other factors identified in this policy. Our client considers that within this policy and/or the supporting text it should be recognised that the principle of a tall building at College Road, up to 19-storeys in height and projecting above Harrow Weald Ridge, has been accepted by the Secretary of State. This is necessary to be consistent with the CS and also the comments made by the Inspector at the CS EiP.	supporting text it should be recognised that the principle of a tall building at College Road, up to 19-storeys in height and projecting above Harrow Weald Ridge, has been accepted by the Secretary of State.		the following grounds: Policy CS2J applies to the whole of the Intensification Area, not just to the sub areas of Harrow Town Centre; The AAP gives effect to the Core Strategy but need not repeat these higher order policies; The policies of Chapter 4 of the AAP are not intended to be site specific – reference to 51 College Road within Policy AAP1 would be a departure from this intended approach; Lastly, the principle of a tall building at College Road, up to 19-storeys in height, is appropriately recognised in the AAP at Chapter 5: Sub Area and Site Specific Guidance for Site 18: 17 to 51 College Road. <b>No change</b>
22	120	English Heritage	Policy AAP1: Development within Harrow Town Centre	Yes	We would encourage the Council to include a bullet point within section A of the policy to address the need for developments to conserve and enhance the significance of heritage assets, including their settings, especially the existing setting of St Mary's Church and Harrow-on-the-Hill. At present the policy wording falls short of recognising the need to protect these key heritage features that help define the context of Harrow Town Centre. We note that the AAP includes policy AAP8: Enhancing the Setting of Harrow Hill, however there is a lack of connection between these policies.	Include a bullet point within section A of the policy to address the need for developments to conserve and enhance the significance of heritage assets, including their settings, especially the existing setting of St Mary's Church and Harrow-on-the-Hill	N/S	The first three policies of the AAP deal with issues specific to the different sub areas within the Heart of Harrow. Matters relevant to all are not included in these policies but rather are dealt with in the preceding relevant topic based policies. With regard to the need for developments to conserve and enhance the significance of heritage assets, including their settings, these are appropriately dealt with in Policy AAP4: Achieving a High Standard of Design of Development throughout the Heart of Harrow, Part A(b) and Policy AAP8: Enhancing the Setting of Harrow Hill. The Council does not consider there to be any disconnect between the policies. <b>No change</b>

#### Policy AAP2: Station Road

No comments received

#### Policy AAP3: Wealdstone

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
3	007	Anne Swinson Hatch End Association	Policy AAP3: Wealdstone, Part D/d	N/S	Clarity	The text "the primary and enabling development" is not clear. And should "conforms" read "conform"?	N/S	Agreed, error needs correcting – <b>see proposed minor modification no. AAP4</b>

#### Policy AAP4: Achieving a High Standard of Development throughout the Heart of Harrow

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	013	Greater London Authority	Policy AAP4: Achieving a high standard of development	Yes	Supported. With respect to Part A. j. of this policy (and supporting text in paragraph 4.37), the Council should include a reference to recycling.	E.g. "... <i>Make satisfactory on site provision for the disposal and storage of waste and recycling...</i> "	Yes	The Council agrees that it is useful to identify recycling as being separate to general waste in respect of requirements for storage and disposal – <b>see proposed minor modification no. AAP5</b>
9	052	Irene Wears on behalf of	Policy AAP4: Achieving a	Yes	<b>Housing</b> - We are pleased to note the many references to plans for high quality development in the Intensification Area. However for	Control the use of balcony areas	N/S	Such matters are for the management company / body corporation of the building / site to require and enforce.

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
		Campaign for a Better Harrow Environment	High Standard of Development throughout the Heart of Harrow		housing developments it will be important to ensure that the impact of attractive, well designed buildings is not spoiled by the use of balcony areas for storage, drying washing etc as is already happening at the Neptune Point development. Such practices are unlikely to attract the young, professional home buyers that are sought.	for storage, drying washing etc.		<b>No change</b>

#### Policy AAP5: Density and Use of Development

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	014	Greater London Authority	Policy AAP5: Density and use of development	Yes	The intention to promote temporary uses for community benefit within dormant development sites is strongly supported in line with London Plan Policy 7.3	None	Yes	GLA support for Part F of the policy is noted.
9	049	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP5: Density and Use of Development	Yes	<b>Housing</b> - We note with approval that:  a) on housing, references in the previous draft to a possible trade-off between amenity and privacy in some cases and exceeding London Plan densities in others, as shown in the earlier draft have now been removed	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
22	123	English Heritage	Policy AAP5: Density and Use of Development	Yes	In the case of both AAP5 and AAP6, the wording of these policies do not consider the potential of high density developments or tall buildings being designed so that they help enhance the significance of heritage assets. Nor do the policies consider the possibility of existing buildings being removed so that the significance of heritage assets is better revealed. We would suggest that these possible scenarios are addressed and expressed in the two policies.	Amend the policies to provide for the potential for:  high density developments or tall buildings to be designed help enhance the significance of heritage assets; or  removal of existing buildings to better reveal the significance of a heritage asset.	N/S	As stated at paragraph 2.29, there are only eight listed building in the whole of the Heart of Harrow area. With the exception of Headstone Manor and development of the adjacent Zoom Leisure Site – which the Council considers is appropriately addressed in the site specific guidance to Site 1 & 2 – the Council does not consider that development within the Heart of Harrow would presents such potential opportunities that would warrant inclusion of such wording within the policies. Further, the Council would argue that, were such a potential to arise, this could be adequately addressed through the appropriate application of Policy AAP4: Achieving a High Standard of Development throughout the Heart of Harrow, Part A(b). <b>No change</b>

#### Policy AAP6: Development Height

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
3	008	Anne Swinson Hatch End Association	Policy AAP 6: Development height, paragraph 4.62	N/S	Landmark buildings should exclude “active ground floor activities” which are liable to be ephemeral or shoddy, such as stalls and the like.	Any retail element should therefore be described as having a “permanent” character.	N/S	Disagree. The requirement is for active ground floor uses, which may include but are not limited to just retail uses. The AAP (see Policy AAP 4 a) is clear that all development is to be of a high quality. Therefore the Council will require the provision of high build quality ground floor units to be provided for active uses (commercial or otherwise). However, it is beyond the scope of the Plan and the planning system to control the quality of the operator/occupier of such units – such matters are for the market to determine. <b>No change</b>
5	015	Greater London Authority	Policy AAP6: Development	Yes	With respect to taller buildings, the Council's intention to maintain a sense of the prevailing building parapet height along street frontages	The Council may, therefore, wish to refine with wording of Policy	Yes	The Council agrees that the suggested refinement of the wording of Policy AAP6(C)(d) would help to clarify the intent of the policy – <b>see</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
			height, Part C/d.		(even where new development may exceed this) is supported.  However, officers are of the view that the use of the term "podium" in this context has the potential to cause confusion.	AAP6, part d, for clarity. As an example, the wording could be revised as follows: "Provide for an articulation of the prevailing parapet height of adjacent buildings, even in instances where development proposals would exceed this."		<b>proposed minor modification no. AAP7</b>
5	016	Greater London Authority	Policy AAP6: Development height	Yes	Whilst "taller", "tall" and "landmark" buildings are adequately defined in the supporting text to Policy AAP6, for ease of reference, the Council may also wish to provide concise definitions of these terms within the glossary.	Include in the Glossary the definitions for "taller", "tall" and "landmark" buildings	Yes	The Council agrees that it would be helpful to also include the definitions of "taller", "tall" and "landmark" buildings within the Glossary – <b>see proposed minor modification no. AAP35 and AAP37</b>
9	043	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP6: Development Height	Yes	We note with approval the following new material in the Area Action Plan:  c) the more rigorous criteria and clearer definitions now set down in policy AAP6. We hope that this will ensure that any tall development proposed for the centre of Harrow will be of the highest quality. We also note the guidance on height given for individual allocated sites.	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
10	063	CBRE on behalf of Dandara Ltd	Policy AAP6: Development Height	No	Policy AAP6: Development Height – In the context of their site at 51 College Road, our client objects generally to the content of this policy. Whilst reference to the site parameters in Chapter 5 for development sites is welcomed, they have particular concerns regarding the requirements of the remaining sub-sections not least as, being policy, greater weight would be attached to these than to the site specific parameters where a conflict between them occurred. The policy fails to recognise that the Secretary of State has already established that the principle of a tall building on the site of 51 College Road and that a tall building specifically on that site may project above the Weald Ridge. The acceptability of a tall building at 51 College Road is explicitly referenced within Paragraph 5.15 of the Core Strategy, and whilst the parameters in Chapter 5 do reflect this, it is not reflected in the Policy framework per-se. The Policy framework of the APP is therefore fundamentally inconsistent with the adopted Core Strategy. Moreover the CS specifically states that the Intensification Area is suitable for locating (at least one) tall building yet this is not reflected in the specific policy framework. The issue of the SoS's Decision was a discussion matter in the CS EIP and the Inspector there was of the view that it was appropriate in the CS to acknowledge specifically the decision at College Road. Subsequently the CS was revised and adopted on this basis and this therefore needs to be picked up under the AAP policy framework to be both consistent and sound.	To be consistent with the Core Strategy, the AAP policy framework should specifically acknowledge that site at 51 College Road as being suitable for a tall building.	N/S	Policy AAP6 applies to the whole of the Heart of Harrow and, in accordance with the Core Strategy (Policy CS2J), makes specific provision for tall, landmark buildings within the Intensification Area. As stated previously, the policies of the AAP are not intended to be site specific, such detail, for allocated sites, is appropriately left to the Sub Area and Site Specific Guidance set out in Chapter 5. In respect of 51 College Road, the material consideration (i.e. the appeal decision and the acceptance in principal of a tall building up to 19 storeys on this site) is included in the Site Specific Guidance for Site 18. The Council is therefore satisfied that there is no conflict between Policy AAP6: Development Height and site allocation 18: 17-51 College Road, and that the AAP is consistent with the Harrow Core Strategy. <b>No change</b>
10	064	CBRE on behalf of Dandara Ltd	Policy AAP6: Development Height	No	Further, we would reiterate our concerns from the representations submitted in February regarding the Views Assessment carried out, but untested through consultation/analysis, that forms part of the LDF evidence base. This has now manifested itself into the Development Management Policies DPD (see separate representation) and is explicitly referenced under E of Policy AAP6 as a test of acceptability for tall buildings. That Views Assessment continues to contradict the SoS's decision and the general approach to the policy framework fails to recognise the evidence and technical analysis that was undertaken for the appeal, robustly tested and analysed and which was accepted in his decision. Again, this is	N/S	N/S	The Views Assessment was commissioned to address the failings of the designated UDP local views as identified through the appeal hearing for 51 College Road. The draft Views Assessment was published alongside the AAP Preferred Option for consultation. The respondent, alongside others, made representations to the draft Views Assessment, which was subsequently amended to take account of these comments before being finalised. The comments received to the draft Views Assessment, and Council's response to these, is included in the Consultation Statement for the Regulation 18 stages of the AAP, available on the Council's website: <a href="http://www.harrow.gov.uk/downloads/file/12286/consultation_statem">http://www.harrow.gov.uk/downloads/file/12286/consultation_statem</a>



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					<p>fundamentally inconsistent with the adopted Core Strategy which references the acceptability in principle of a tall building at 51 College Road. Furthermore, the Views Assessment and its current reference within both the AAP and DMP DPD have fundamental impacts on the provision of taller buildings generally within the AAP which raises questions over the ability of the AAP to deliver its target outputs. Given all of the above, our client considers that both the AAP and DMP DPD are unsound in respect to this issue.</p> <p>These comments on the issue of tall buildings, particularly in respect to the 51 College Road site are relevant throughout the AAP DPD where mention to views and vistas occurs.</p>			<p><a href="#">ent for the area action plan</a></p> <p>The Council is satisfied that the findings of the Views Assessment are robust having been carried out by an appropriately qualified professional consultant, undertaken in accordance with the London Views Management Framework methodology; and having been the subject of public consultation and revised accordingly.</p> <p>With regard to Site 18: 17-51 College Road, the Views Assessment shows that the site lies in the yellow consultation zone of three viewpoints: Grove Open Space, Old Redding and the Roxborough footbridge; and is within the red viewing corridor of a fourth, Wood Farm. View cones, by their nature, can overlay hundreds of properties, as the above views all do. Therefore, the Council does not consider it appropriate or necessary to exclude valid local views, robustly justified as being worthy of protection, on the basis of a material consideration affecting just one property, especially where the exact location of the proposed tall building within the site remains unknown and subject to planning and detail design considerations. The Council maintains that it is justified, on the basis of the robust evidence, to include these views within the AAP and Development Management Policies DPD, but to have regard to the material consideration (i.e. the appeal decision and the acceptance in principal of a tall building up to 19 storeys on this site) for Site 18 within the Site Specific Guidance. The Council is therefore satisfied that there is no conflict between the findings of the Views Assessment, the policies of the AAP and site allocation for Site 18: 17-51 College Road.</p> <p><b>No change</b></p>
10	065	CBRE on behalf of Dandara Ltd	Paragraph 4.70	No	<p>Para 4.70 – This paragraph introduces the premise that taller and tall landmark buildings are encouraged to provide viewing galleries and platforms. Again our client would reiterate their objection to any such provisions that was contained in their February 2012 submission. It is considered commercially unrealistic and generates numerous health, safety, security, management and service charge costs on a scheme once complete., The practicalities are therefore that the level of demand and interest is likely to be low and would be outweighed against the costs of maintaining such facilities. Those costs would need to be recovered through service charges as any potential income for allowing access could not be guaranteed, and this would have to be shared across all tenants and residents, including affordable units, increasing significantly the service charge imposed on that sector. Additionally, unlike the buildings in central London, there is not the equivalent catchment population on which to draw and sites where this requirement would apply would not attract or be suitable for the bar/restaurant or similar uses to underpin any access. Additionally, in the context of the architectural style that the AAP DPD seeks to define for tall/taller buildings, there is not the scale or mass in which to accommodate segregated lift cores etc which, amongst many other things, presents a security issue for residential occupiers. The increased demands that there would be and the need to accommodate equal access requirements all undermines viability further. Indeed, we would advocate that a building with a residential component that cannot be segregated is unsuitable for public access and for hosting viewing platforms/galleries. Buildings that accommodate such facilities, have separate lift cores and are predominantly in commercial use. It should also be noted that viewing access is encouraged within tall and taller buildings, which by the Core Strategy definition is anything over 30m equivalent to 10</p>	Remove reference in paragraph 4.70 to the premise that taller and tall landmark buildings are encouraged to provide viewing galleries and platforms	N/S	<p>Policy AAP6E states that, in addition to the criteria listed therein, proposals for tall buildings will be considered in accordance with the criteria of the London Plan. London Plan Policy 7.7C, criteria (h), states that tall buildings should, amongst other things, “<i>incorporate publicly accessible areas on the upper floors, where appropriate</i>”.</p> <p>Having regard to the criteria of the London Plan, paragraph 4.70 of the AAP seeks to highlight the outstanding views over London that can be achieved within the Heart of Harrow, and the fact that proposals for taller and tall landmark buildings within the Heart of Harrow provide an appropriate opportunity for the public to enjoy such views. However, the Council accepts that the wording of paragraph 4.70 is not wholly consistent with the London Plan and therefore considers it appropriate to amend the paragraph to better reflect criteria (h) of the London Plan Policy 7.7 – <b>see proposed minor modification no. AAP9</b></p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					storeys.			
22	121	English Heritage	Policy AAP6: Development Height	Yes	Reflective of our previous comments to the Preferred Option, we would suggest that the wording of the policy should be amended so that it mirrors closely the NPPF, in terms of conserving the historic environment.	AAP6 where reference is made to the protection and preservation of the historic character (Part C b. and Part E g.). We would advise that this should be expressed as 'conservation and enhancement of the significance of heritage assets and the wider historic environment'	N/S	The Council agrees that the wording of the policy should mirror closely to that of the NPPF – <b>see proposed minor modification no AAP6 and AAP8.</b>
22	122	English Heritage	Policy AAP6: Development Height	Yes	Reflective of our previous comments to the Preferred Option, we would suggest that the wording of the policy should be amended so that it mirrors closely the NPPF, in terms of conserving the historic environment.	In addition Part G of policy AAP6 could be expanded so that applicants are required to undertake both urban design analysis and heritage assessment, so ensuring the significance of heritage assets are understood and appropriately conserve in the light of tall building proposals.	N/S	The Council considers, and would expect, heritage assets to be identified and assessed as part of a comprehensive urban design analysis, and would not expect the assessment of any potential impacts upon the historic environment to be divorced to a separate assessment. <b>No change</b>
22	123	English Heritage	Policy AAP6: Development Height	Yes	In the case of both AAP5 and AAP6, the wording of these policies do not consider the potential of high density developments or tall buildings being designed so that they help enhance the significance of heritage assets. Nor do the policies consider the possibility of existing buildings being removed so that the significance of heritage assets is better revealed. We would suggest that these possible scenarios are addressed and expressed in the two policies.	Amend the policies to provide for the potential for:  high density developments or tall buildings to be designed help enhance the significance of heritage assets; or  removal of existing buildings to better reveal the significance of a heritage asset.	N/S	As stated at paragraph 2.29, there are only eight listed building in the whole of the Heart of Harrow area. With the exception of Headstone Manor and development of the adjacent Zoom Leisure Site – which the Council considers is appropriately addressed in the site specific guidance to Site 1 & 2 – the Council does not consider that development within the Heart of Harrow would presents such potential opportunities that would warrant inclusion of such wording within the policies. Further, the Council would argue that, were such a potential to arise, this could be adequately addressed through the appropriate application of Policy AAP4: Achieving a High Standard of Development throughout the Heart of Harrow, Part A(b). <b>No change</b>

### Policy AAP7: Creating a New Public Realm

No comments received

### Policy AAP8: Enhancing the Setting of Harrow Hill

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	017	Greater London Authority	Policy AAP8: Enhancing the setting of Harrow Hill	Yes	Whilst the thrust of this policy is strongly supported, in line with the approach described in supporting paragraphs 4.91 and 9.92 (that a successful urban silhouette for Harrow Town centre is as much about views between buildings, as the buildings themselves), the Council may wish to replace the term "compact urban form" with "coherent urban form" in the policy and supporting text. This would help to convey the message that the Council is promoting key singular tall points to aide legibility within the town centre, rather than a singular	Replace the term "compact urban form" with "coherent urban form" in the policy and supporting text.	Yes	The Council agrees that the suggested refinement of the wording of Policy AAP8(A)(a) would help to clarify the intent of the policy – <b>see proposed minor modification no. AAP10</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					consolidated cluster of tall buildings			
5	018	Greater London Authority	Policy AAP8: Enhancing setting of Harrow Hill	Yes	The inclusion of Figure 4.2, identifying protected views across the intensification area, is supported, as is the cross referencing to detailed policies within the Development Management Policies DPD with respect to protected views and vistas, and conserving heritage assets.	None	Yes	GLA support for the inclusion of Figure 4.2 and the cross referencing to the Development Management Policies DPD within Policy AAP8 is noted.

### Policy AAP9: Flood Risk and Sustainable Drainage

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
4	010	Thames Water	Policy AAP9: Flood Risk and Sustainable Drainage	No Not effective & not consistent with national policy	<p>We do not object to the policy in principle, but consider that it does not adequately cover sewerage 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>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>“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....”</b></p> <p>Paragraph 162 of the NPPF relates to infrastructure and states:</p> <p><b>“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.”</b></p> <p>Policy 5.14 of The London Plan, July 2011, relates to Water Quality and Wastewater Infrastructure and states:</p> <p><b>“LDF preparation E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.”</b></p> <p>Policy 5.15 relates to Water Use and Supplies.</p> <p>It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development.</p>	<p>To accord with the NPPF and the London Plan text along the lines of the following section should be added to the AAP:</p> <p><b><u>“Water Supply &amp; Sewerage Infrastructure</u></b></p> <p><b><i>It is essential that developers demonstrate that adequate water supply and sewerage infrastructure 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.</i></b></p>	N/S	<p>The Core Strategy already includes Core Policy CS1Z 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 CS1Z 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 AAP, 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>In light of the representation made by this respondent at the Preferred Option stage, the reasoned justification to policy AAP 9 was amended to draw attention to those AAP Opportunity Sites where Thames Water had raised concerns regarding waste service 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 CS1Z and paragraph 4.112 of the AAP adequately addresses the respondents concerns.</p> <p><b>No change</b></p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					<p>Thames Water is concerned that the network in this area may be unable to support the demand anticipated from this development. The AAP therefore needs to consider the net increase in water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</p> <p>The list of issues covered in the AAP should therefore make reference to the provision of water and sewerage infrastructure to service development as follows:</p> <ul style="list-style-type: none"> <li>• The areas demand for water network infrastructure both on and off site and can it be met</li> <li>• The developments demand for sewerage network infrastructure both on and off site and can it be met</li> <li>• The surface water drainage requirements and flood risk of the area and down stream and can it be met</li> </ul> <p>In relation to flooding, Thames Water consider the AAP should include guidance 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 sea which includes "<i>Flooding from Sewers</i>". The AAP 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>			
5	019	Greater London Authority	Policy AAP9: Flood risk and sustainable drainage	Yes	Broadly supported as a pragmatic approach to managing flood risk within the intensification area. The reference to sustainable urban drainage systems is supported in line with previous representations.	None	Yes	GLA support for Policy AAP 9 is noted.
18	105	Environment Agency	AAP9: Flood Risk and Sustainable Drainage, Part B	Yes	We are really pleased to see such a positive policy towards the management and reduction of flood risk in this Policy.	None	N/S	The Environment Agency's support for Part B of Policy AAP9: Flood Risk and Sustainable Drainage is welcomed and noted.
18	106	Environment Agency	AAP9: Flood Risk and Sustainable Drainage,	Yes	Part E is particularly good as this sets a strong position on the reduction and management of surface water run off and fluvial flooding and water pollution will contribute significantly towards meeting the Water Framework Directive objectives for the local water	None	N/S	The Environment Agency's support for Part E of Policy AAP9: Flood Risk and Sustainable Drainage is welcomed and noted.

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
			Part E		bodies.			
18	107	Environment Agency	Paragraph 4.117 – 4.120	Yes	We are pleased that net flood risk reduction measures have been listed and described in further detail within the reasoned justification. These special measures will play an important role in ensuring that those developments within areas previously designated within Flood Zone 3b (functional floodplain) will meet stringent flood risk criteria to ensure that the development and site users will be kept safe and the area will benefit from positive reductions in flood risk in the area through the redevelopment.	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.

### Policy AAP10: Harrow & Wealdstone District Energy Network

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	020	Greater London Authority	Policy AAP10: Harrow & Wealdstone district energy network	Yes	This policy is supported. Paragraph 4.125 encapsulates well the heatload characteristics of the intensification area, and represents a pragmatic way to promote the development of an area-wide decentralised energy network(s) in this location.	None	Yes	GLA support for Policy AAP10 is noted
5	021	Greater London Authority	Policy AAP10: Harrow & Wealdstone district energy network	Yes	The reference to the need for biomass boilers within energy strategies to satisfy air quality standards in line with the Mayor's Air quality Strategy is supported.	None	Yes	GLA support for the inclusion of the reference in paragraph 4.127 to the need for biomass boilers within energy strategies to satisfy air quality standards in line with the Mayor's Air quality Strategy is noted.

### Policy AAP11: Provision of Open Space

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	022	Greater London Authority	Policy AAP11: Provision of open space, paragraph 4.137	Yes	Supported. The stated aspiration to achieve the 10 square metre per child provision of children's play space, in line with the Mayor's supplementary planning guidance, is welcomed in response to previous representations. The Council should note, however, that the Mayor has recently published draft updated supplementary planning guidance " <i>Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation</i> ", the referencing in supporting text should, therefore, be updated accordingly.	Update the reference in the supporting text	Yes	GLA support for the targets for provision of children's play space is noted. The Council notes that the Mayor's SPG has been updated and agreed that the reference in paragraph 4.137 should be amended to reflect the current title of the SPG – <b>see proposed minor modification no. AAP11</b>
5	023	Greater London Authority	Policy AAP11: Provision of open space, paragraph 4.146	Yes	Along with citing the Harrow Green Grid, the Council may wish to include an additional reference, within supporting paragraph 4.146, to the " <i>All London Green Grid</i> " supplementary planning guidance, which was published in March 2012.	Include an additional reference, within supporting paragraph 4.146, to the " <i>All London Green Grid</i> " supplementary planning guidance	Yes	The Council agrees that it would be useful to include a reference to the All London Green Grid SPG, to which the Harrow Green Grid seeks to implement at the borough level – <b>see proposed minor modification no. AAP12</b>
9	050	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP11: Provision of Open Space	Yes	<b>Housing</b> - We note with approval that:  b) Policy AAP11 now stipulates that all residential developments should provide green space for private or shared use by occupants.	None	N/S	The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.



### Policy AAP12: Improving Access to Nature

No comments received

### Policy AAP13: Housing within the Heart of Harrow

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	024	Greater London Authority	Policy AAP13: Housing within the heart of Harrow	Yes	With respect to Part C of this policy, the Council is invited to introduce further detail within the reasoned justification to express the local trends which have influenced the policy approach with respect to tenure split in Central Wealdstone.	Provide further detail within the reasoned justification to support the variation in tenure split in Central Wealdstone	Yes	The Council agrees that, to better support the variation in tenure split sought by the Policy for the Central Wealdstone sub area, further detail should be provided in the reasoned justification – <b>see proposed minor modification no. AAP13</b>

### Policy AAP14: The Consolidation of the Wealdstone Strategic Industrial Location

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	025	Greater London Authority	Policy AAP14: Consolidation of Wealdstone SIL	Yes	<p>The policy approach to consolidation of the Wealdstone preferred industrial location, identified as a strategic industrial location by London Plan Policy 2.17, is supported as a positive and pragmatic approach to managing change in this location following the ongoing consolidation in the operations of Kodak Ltd. at opportunity site 2.</p> <p>With respect to the detail of Policy AAP14, the requirement for robust economic analysis to justify consolidation, and the stated need to ensure accordance with London Plan Policy 2.17 is particularly supported. Given the scale of consolidation, expressed through site specific guidance within Chapter 5, and recently approved outline planning application P/3405/11, part C of this policy (which states that no further consolidation will be supported over the plan period) is supported.</p>	None	Yes	GLA support for Policy AAP14 is noted, especially in respect of Part C.

### Policy AAP15: Supporting the Business Sector in Wealdstone

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	026	Greater London Authority	Policy AAP15: Supporting business in Wealdstone	Yes	This policy is supported as a positive and pragmatic approach to promoting the rejuvenation of local business and employment space within Wealdstone, and contributing to the renewal of the town centre.	None	Yes	GLA support for Policy AAP15 is noted.
13	080	CgMs on behalf of MOPAC and the Metropolitan Police	AAP 15: Supporting the Business Sector in Wealdstone	Yes	The MOPAC/MPS support Policy AAP 15 which requires applicants for mixed use developments on employment sites to demonstrate that efforts to secure essential community infrastructure not appropriate for town centre locations (e.g. police patrol bases, custody centres) have been explored but have not been successful. This is consistent with the prevailing planning policy framework and should therefore be retained.	None	N/S	MOPAC/MPS support for Policy AAP15 is noted.

### Policy AAP16: Supporting the Service Sector in Harrow Town Centre

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	027	Greater London Authority	Policy AAP16: Supporting the service sector in Harrow town centre	Yes	This policy is supported as a positive approach to promoting consolidation, reconfiguration and enhancement of office stock within Harrow town centre.	None	Yes	GLA support for Policy AAP16 is noted.
9	058	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP16: Supporting the Service Sector in Harrow Town Centre	Yes	<p><b>Town centre office blocks</b> - At para 4.199 the Plan refers to the evidence of the 2010 Harrow Employment Land Study which studied 28 office and industrial locations across the borough. In Harrow town centre, 76-132 College Road and the Lyon/Equitable House sites were investigated. There are of course also now unoccupied buildings farther down College Road which have the benefit of being rather more modern. The Study suggests that there may still be a future as offices for some of the more modern blocks, subject to improvements in town centre facilities and more generous parking ratios. The Study urges the Council, "to adopt a plan, monitor and manage approach" in the light of the universal economic uncertainties and the inevitably fluid situation in Harrow arising from the implementation of the Area Action Plan.</p> <p>This is an obvious and important strategy. However, from Policy AAP 16 and the Reasoned Justification that follows, it is not at all clear to us that the Council is developing such a strategy. We do not underestimate the difficulties involved, but nonetheless we think this is vital. On the one hand, a revitalised office sector could prove invaluable to the future prosperity of the town centre. On the other, if this shows no signs of materialising, then changes of use would be an important part of Sustainable Development.</p>	None	N/S	As set out in the Employment Land Study, the age of the majority of the office stock in Harrow town centre, and the high vacancy levels currently being experienced, mean that the rent levels being achieved are low – too low to drive investment in new build office development. The study also notes that current and projected trends for Harrow are not for large format offices for single private or public sector occupiers – rather the local office market is for more flexible smaller scale space but with access to good amenities and services. It is therefore crucial that the AAP address the levels of office vacancy and seek to renew and revitalise Harrow's office market. The Council considers the only approach to delivering such change is to allow these large vacant office buildings to come forward for mixed use redevelopment but on the basis that the scheme includes re-provision of a portion of the existing office floorspace. The result is the provision of a new build office tailored to meet local needs and an overall reduction in the level of vacant office floorspace which, once it gets down to 10% (i.e. what the market considers to be normal churn) should begin to impact positively on office viability, and if the demand is there, as the Employment Land Review suggests it will be, then this will drive a new office market in the town centre. Nevertheless, the Council will continue to monitor the situation with regard to Harrow office market and the impacts of the policy and the AAP and will, if necessary, amend the approach should the policy not be effective in delivering the outcomes sought – see Core Strategy monitoring indicators TCR8 – TCR11. <b>No change</b>
13	081	CgMs on behalf of MOPAC and the Metropolitan Police	AAP 16: Supporting the Service Sector in Harrow Town Centre	Yes	The MOPAC/MPS support Policy AAP 16 which recognises community facilities as appropriate uses within Harrow Town Centre. This is consistent with strategic and local planning policies and should be retained within the emerging AAP.	None	N/S	MOPAC/MPS support for Policy AAP16 is noted.

#### Policy AAP17: Primary Shopping Areas and the Primary Shopping Frontage

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	028	Greater London Authority	AAP17: Primary shopping areas	Yes	This policy is supported. The promotion of temporary uses to activate vacant ground floor high street units is particularly welcomed.	None	Yes	GLA support for Policy AAP17 and, in particular, Part F is noted.
17	102	RPS Planning on behalf of Person Pensions Property Fund	Paragraph 4.206	No Not Justified	Paragraph 4.206 of the Harrow and Wealdstone Area Action Plan (AAP) states that the 2009 Harrow Retail Study recommends that provision is made for 38,900sqm of retail floorspace for the plan period to 2026, and it is indicated that the focus for new retail development is to be within Harrow Town Centre.	Paragraph 4.206 needs to be amended to appropriately reflect the 2009 Harrow Retail Study's prediction that 38,912sqm net comparison and 5,261sqm net convenience floorspace by 2025,	Yes	The Council agrees that the retail figures in the AAP should be consistent with the retail figures quoted in the adopted Core Strategy – <b>see proposed minor modification no. AAP15</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					RPS disagrees with this retail target of 38,900sqm as this is a lower target than what is actually recommended in the Harrow Retail Study. The Retail Study predicts that there will be a requirement for 38,912sqm net comparison and 5,261sqm net convenience floorspace by 2025, providing a total of 44,173sqm. This is also a year short of the plan period. In addition, as the Retail Study was undertaken in 2009, it is considered to be out of date and may not reflect current retail needs.	providing a total of 44,173sqm, and additional sites identified to meet this requirement.		
17	103	RPS Planning on behalf of Person Pensions Property Fund	Policy AAP17: Primary Shopping Areas and the Primary Shopping Frontage	No	<p>RPS also considers the AAP to be too vague as it does not state what amount of this retail provision is to be delivered on the allocated sites proposed in the AAP, and what mix of convenience and comparison goods is necessary to be provided. Therefore, it is considered that the AAP is inappropriate in determining suitable sites to meet the retail requirement for the Borough to 2026, as it is unclear whether this requirement can be met on allocated sites and existing commitments.</p> <p>Therefore, RPS recommends that the Council needs to consider other suitable and available sites to contribute towards this retail provision, to ensure that the future needs of the Borough are appropriately met.</p>	For the AAP to be sound, it needs to states the amount of retail floorspace, both convenience and comparison, which is aimed to be delivered in the Harrow and Wealdstone AAP intensification area on the allocated sites proposed. This is so that it can be determined how much of the Borough's required retail floorspace can be accommodated on identified sites, to then appropriately consider additional sites to ensure this requirement can be met.	Yes	<p>The AAP, along with the Site Allocations DPD, allocates a range sites for retail/mixed use development sufficient to meet Harrow's retail needs over the short to medium term (2009-2020), and includes policies for meeting unmet needs in other accessible locations that are well connected to the town centres. As set out in the Retail Study, beyond 2020, longer term projections should be treated with caution and should only be used as a broad guide, particularly when translated into the development plan allocations. Indicative retail floorspace figures for allocated retail/mixed use development sites within the Heart of Harrow are provided in the Retail Study, and are transposed in the AAP into the jobs target set for each sub area and allocated site. The Council considers the approach set out in the AAP to be the most appropriate. It responds to the current economic climate and to the issues affecting our high street as identified in the Portas Review, and provides a policy framework aimed at enabling the retail sector in particular to adapt and respond to market needs, for land use within centres to diversify, and to improve the urban environment, ensuring the town centres retain their vitality.</p> <p><b>No change</b></p>
17	104	RPS Planning on behalf of Person Pensions Property Fund	AAP17: Primary Shopping Areas and the Primary Shopping Frontage	No Not justified	<p>The policy states that major retail development will be focused on allocated sites identified in the Harrow and Wealdstone Area Action Plan (AAP) and Primary Shopping Area (PSA) of Harrow Town Centre. Outside of this area the policy proposes a sequential approach to development on other sites focused on secondary shopping frontages in the town centre, followed by other sites within the town centre boundary, then sites within the PSA of Wealdstone District Centre, followed by other sites within the District Centre boundary. These locations are to be considered before any other allocated sites in the Borough.</p> <p>Whilst RPS agrees with focusing development within Harrow Town Centre and the AAP area, to enhance the vitality and viability of the town centre, it should be recognised that a number of these sites and locations proposed for retail development will not come forward in the early or middle phases of the plan period.</p> <p>Therefore, it is considered important that the Council acknowledges additional sustainable sites in other areas to meet the Boroughs retail needs of 44,173sqm floorspace to 2026, and to support the predicted population increase of 26,000 people between 2008 and 2028 as the ONS Projections to 2033 suggest.</p> <p>The accommodation of this additional retail floorspace should include sites outside of District Centres following a sequential approach which could contribute towards the delivery of the required retail floorspace in the short term, such as the Northolt Road Retail Park.</p>	<p>The AAP should recognise that other sites outside of the AAP area and in addition to other allocated sites proposed are required to ensure the Boroughs retail needs can be fully met by 2026, in particular sustainable and accessible out-of-centre sites which are in existing retail use.</p> <p>Due to the uncertainty over the level of comparison or convenience floorspace that sites in the AAP can contribute to meeting retail floorspace needs, they should be discounted from the supply and treated as windfall sites.</p>	Yes	<p>The AAP, along with the Site Allocations DPD, allocates a range sites for retail/mixed use development sufficient to meet Harrow's retail needs over the short to medium term (2009-2020), and includes policies for meeting unmet needs in other accessible locations that are well connected to the town centres.</p> <p><b>No change</b></p> <p>The Council also considers that, of the sites allocated for retail in the AAP, there is a steady pipeline of delivery, with sites such as Neptune point delivering this year, Tesco and one site in Havelock Place next year, Lyon Road and Bradstowe House the year after, with Kodak proposed for the year after that. This is complimented by retail development across the remainder of the Borough including Honeypot Lane and Stanmore Car Park.</p> <p>The Council is also content that the sequential approach outlined in the AAP and the Development Management Policies DPD will direct retail development to locate in the most appropriate town centres. Further, the sites in the AAP are allocated for retail use and therefore are not windfall sites.</p> <p><b>No change</b></p>

No comments received

**Policy AAP19: Transport, Parking and Access within the Heart of Harrow**

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	029	Greater London Authority	AAP19: Transport, parking and access	Yes	This policy is broadly supported in line with London Plan policies 6.3, 6.9 and 6.13.	None	Yes	GLA broad support for Policy AAP19 is noted.
9	046	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP19: Transport, Parking and Access within the Heart of Harrow, Part H	Yes	The policies listed at AAP19 on transport access and parking within the Heart of Harrow are acceptable, but the car club recommendations should go further by encouraging rather than merely supporting car club parking schemes and spaces for car club vehicles. Where appropriate these should receive priority over other parking needs with the exception of spaces for disabled drivers.	The car club recommendations should go further by encouraging rather than merely supporting car club parking schemes and spaces for car club vehicles. Where appropriate these should receive priority over other parking needs with the exception of spaces for disabled drivers.	N/S	The Council agrees that the Policy can be strengthened as suggested – <b>see proposed minor modification no. AAP16</b>

**Policy AAP20: Harrow & Wealdstone Green Travel Plan**

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
9	047	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP20: Harrow & Wealdstone Green Travel Plan	Yes	The laudable aims of the green travel plan policy at AAP20 need to be strengthened by provision for more effective monitoring and delivery, with follow-up action taken by the Council where developers either fail to implement, or abandon, green travel plans once a development has been completed. Continuous development should be the aim, rather than one-off plans designed only to secure approval of planning applications.	Include requirement for more effective monitoring and delivery of travel plans, including follow-up actions by the Council.	N/S	The requirements for monitoring the implementation of a Travel Plan are included in the Travel Plan itself, which has to be agreed with the Council. Standard requirements include the production of an annual monitoring report to be submitted to the Council for review. On grant of planning permission the delivery of the Travel Plan is included in the legal agreement, and is therefore binding upon the land and future owners, and any breaches in compliance with the requirements of the Travel Plan are therefore enforceable through legal means. In preference to including the above within the reasoned justification to Policy AAP20, the Council considers it appropriate to include a reference to the fact that implementation and enforcement of the agreed Travel Plan is to be secured through the legal agreement – <b>see proposed minor modification no. AAP17</b>

**Policy AAP21: Harrow Waste Management Site**

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	030	Greater London Authority	AAP21: Harrow Waste management site	Yes	The Plan's interest in investigating intensification of the Civic Amenity site and depot sites is supported.  Part A of this policy identifies criteria that the Council will consider a proposal for a new waste facility against. Whilst the principles within the criteria are supported, these are not exhaustive when considered against strategic criteria within London Plan Policy 5.17, part B. Officers would, therefore, welcome the revision of the policy to accurately reflect the all the criteria within Policy 5.17, or an	Revise the policy to accurately reflect the all the criteria within Policy 5.17, or an acknowledgement of/reference to the strategic criteria provided by this policy.	Yes	Any proposal for a waste management facility will require consideration against the policies of the London Plan; the West London Waste Plan DPD; the Harrow Core Strategy and the Area Action Plan. The Council considers there is potential for significant overlap, and therefore agrees that a reference to the strategic criteria of London Plan Policy 5.17 is more appropriate – <b>see proposed minor modifications no. AAP18</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					acknowledgement of/reference to the strategic criteria provided by this policy.			
5	031	Greater London Authority	AAP21: Harrow Waste Management site	Yes	Paragraph 4.243 provides context to the potential for redevelopment of Harrow's waste management site to provide a waste treatment facility, and the need to accommodate Council depot operations which currently occupy the site.	In line with the principles of London Plan Policy 5.17, part H, the Council is advised to add a line which clarifies that whilst under certain circumstances intensification of this waste site may result in a contraction of depot land area, the maximum throughput of the Council's depot site would be maintained as a norm.	Yes	The requirement to make compensatory provision of equal throughput capacity is included in Policy 1 of the Pre-Submission draft of the West London Waste Plan as well as London Plan Policy 5.17H. However, the current depot site is not in existing waste use and therefore has a theoretical waste treatment capacity rather than an existing licensed maximum throughput. Nevertheless, the Council agrees a reference to the need to maintain the potential waste treatment capacity of the site should be included in the reasoned justification to Policy AAP21 – <b>see proposed minor modification no. AAP19</b>
9	048	Irene Wears on behalf of Campaign for a Better Harrow Environment	Policy AAP21: Harrow Waste Management Site	Yes	On the Harrow Waste Management Site policy AAP21, the traffic generation criteria (sub paragraph h) should ideally include use of rail transport to remove waste, given the proximity of the site to the West Coast Main Line. It is a pity that the trackbed of the former Stanmore branch line, over which the facility was built, was not safeguarded many years ago to retain rail access to the site.	Include use of rail to transport waste from the site.	N/S	In the course of preparing the West London Waste Plan discussions have taken place with Network Rail, who own and manage Britain's rail infrastructure, about the ability to provide a railhead facility to service this and other waste sites. However, Network Rail advised that they do not support proposals for a railhead that would be accessed directly from the mainline due to operational capacity and safety concerns. <b>No change</b>

#### Policy AAP22: Supporting Site Assembly within the Heart of Harrow

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
10	066	CBRE on behalf of Dandara Ltd	Policy AAP22: Supporting Site Assembly	N/S	Our client supports the Council's stated commitment to use CPO powers where this is appropriate. This explicit statement underpins the robust leadership role they believe the Council should adopt and which has been referred to earlier. However, developers should not be expected nor required by the Council to design or develop beyond their boundaries if they are not willing to do so. There are many reasons why this may be the case, from financial to the implications of delay, and the costs involved. Developments should not be stifled by a desire of the Council to push boundaries and piecemeal development of a larger site might be more beneficial to delaying development coming forward particularly given that the Council will expect the developer to bear all of the cost requirements. It should also be recognised that the use of CPO powers is timely and not conclusive in that an application for CPO does not necessarily mean it will be granted. It is accepted of course that development should not prejudice the bringing forward of adjoining land and that this will require consideration to future redevelopment on neighbouring sites, however the Council's desire for site assembly should not become the landowner/developers responsibility with regards to design costs of a comprehensive scheme.	N/S	N/S	Support for Policy AAP22 is noted. As stated in the reasoned justification to the Policy, the use of CPO is a tool of last resort, and therefore the onus is the developer, not the Council, to demonstrate their case for Council's use of such powers.

#### Chapter 5: Sub Area and Site Specific Guidance

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
----	---------	------------	------------------------	-------	------------------	--------	-------	-------------------------------

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
10	067	CBRE on behalf of Dandara Ltd	Chapter 5 – conceptual illustrations for each site allocation		<p>Since the submission of their representations in February 2012, our client has met with the Council to discuss the site specific policy basis of the previous version of the AAP. In those discussions our client expressed considerable reservations that the indicative concept plans would be taken as representing the general 'approved' concept for the layout of that particular site. The basis of this concern being that these sketches have been prepared with no technical information or understanding of a site's constraints. In this respect such sketches are unlikely to be realistically achievable and therefore misleading, particularly to the lay person who may assume that a sketch is a proposal for a site. The Council's position was that these were only indicative with no such intent.</p> <p>However, as the recent GLA Stage II Report to the Harrow View proposals by Land Securities demonstrates the GLA very much take that view and give emphasis to the indicative concept layouts. In their Report (PDU#2830) they state at paragraph 10 "..... increased symmetry between the site layout promoted by the Harrow &amp; Wealdstone AAP and that proposed within the outline masterplan application".</p> <p>In response to our concerns, the Council agreed to caveat Site 18's indicative concept plan with the statement that the final design and layout "...may be wholly different to the conceptual illustration provided above". Our client believes that no concept plan should be included within the AAP. However, if the Council is not prepared to remove these then this caveat should be extended to all allocated/identified sites that include a conceptual layout plan to avoid ambiguity on the status of these "sketches".</p>	Remove all concept plans from the AAP or extend the caveat to all allocated sites	N/S	<p>At the meeting with agents for this site, the Council highlighted the fact that the vast majority of AAPs included illustrative drawings, many more detailed than that proposed within the Harrow AAP. However, in response to the concerns raised by the respondent at the AAP Preferred Option stage, to the use of site illustrations, the Council amended paragraph 5.2 of the introductory text to Chapter 5 to clearly state that "A conceptual illustration is provided to show how the site objectives, dependencies and design considerations might be addressed on the site. However, such illustrations are not intended to be prescriptive. The final layout and design will need to respond to the Area Action Plan policies and site specific guidance, set out below, and will need to be thoroughly tested through the planning application process".</p> <p>While the Council considered this was sufficient to cover all allocated sites within Chapter 5, for completeness, and because the respondent was the only one to raise this as an issue, the Council also amended the text to Site 18 as stated in the respondents comments. The Council is therefore satisfied that such amendments adequately address the concerns of the respondent.</p> <p><b>No change</b></p>
22	124	English Heritage	Chapter 5: Sub Area and Site Specific Guidance	Yes	<p>Reflective of our comments to the Site Allocations DPD we would suggest that for each site map the proximity of heritage assets should be shown. In addition we would encourage you, as part of demonstrating a positive strategy for the conservation of the historic environment (NPPF para 126) that the significance of all relevant heritage assets are summarised, and expressed in the 'site constraints/dependencies' section. For example if a site falls within or is adjacent to a conservation area, the relevant headline details of the conservation area appraisal and management plan should be raised then used to inform the 'design considerations'. This approach would help ensure that the significance of the conservation area is understood and used to inform how the site could be developed.</p>	For each site map the proximity of heritage assets should be shown and the significance of all relevant heritage assets be summarised and expressed in the 'site constraints /dependencies' section.	N/S	<p>The Council agrees that this would be a useful addition to each site map. While the majority of the site allocations list the relevant heritage assets, this is not true of all of the sites, and the Council also agrees that this anomaly should be addressed – <b>see minor modification no. AAP23, AAP25 and AAP26</b></p>

### Sub Area Wealdstone West

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
22	125	English Heritage	Sub Area: Wealdstone West -	Yes	<p>As raised in our previous letter, English Heritage commented upon the current Outline Planning Application for the redevelopment of the Kodak Site. In that response we raised concerns regarding the impact of the proposed development upon the setting of Headstone Manor (listed grade I) and its site as a Scheduled Monument within a complex of grade II* and grade II listed buildings. We raised the need for this collection of heritage assets to be appropriately protected through a robust policy framework so that the significance of the assets including their settings are not harmed through inappropriate development. We suggested that one of the key considerations for the Wealdstone West sub area (para 3.6.2) should be that Headstone</p>	Suggested that one of the key considerations for the Wealdstone West sub area (para 3.6.2) should be that Headstone Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage assets.	N/S	<p>The Council agrees but considers that this is best included as a key sub area objective for the Wealdstone West sub area – <b>see proposed minor modification no AAP20</b></p> <p>With regard to Site 2: Kodak and Zoom Leisure, it should be noted that the site illustration and text were amended to reflect the fact that the outline planning application for this site has been approved.</p>



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					<p>Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage assets. This would be achieved through thorough analysis of all the heritage assets, their significance and the contribution the setting makes to their significance. This includes assessing the assets individually and collectively. This approach is line with the NPPF and English Heritage's The Setting of Heritage Assets guidance (2011). It is noted that the sub-area site specific guidance (i.e. Site 1: Headstone Manor and environs, and Site 2: Kodak and Zoom Leisure) seek to address these issues. However the details provided in this part of the AAP are still not sufficiently robust to conserve the significance of the Headstone Manor complex and its various settings. For example the illustrations, supported by the text, promote development on land east of the Headstone Manor complex. It is noted that a viewing corridor is proposed, but we are still concerned that the significance of the Headstone Manor complex, as provided by its setting, could be harmed by the proximity and form of the development proposed. We therefore would urge you to address this concern and introduce additional clarity on how developments with the setting of Headstone Manor will address its significance.</p> <p>Finally we would encourage you to state clearly in the text that the Council will use the opportunity of using S106 funding resulting from the redevelopment of the Kodak site to help conserve and enhance Headstone Manor. This includes cross funding the long term future of the historic site and its setting.</p>			

#### AAP Opportunity Site 1: Headstone Manor

No comments received

#### AAP Opportunity Site 2: Kodak & Zoom Leisure

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
5	032	Greater London Authority	Site 2: Kodak and Zoom Leisure	Yes	The GLA notes that the site specific guidance has been revised to closely reflect the approved outline planning application for this site (P/3405/11). This is supported as it reflects an evidence based, viable, proposition for employment regeneration at this site, and the consolidation of strategic industrial land, facilitated by acceptable enabling development.	None	Yes	GLA support for the revised site specific guidance for Site 2 is noted.
5	033	Greater London Authority	Site 2: Kodak and Zoom Leisure	Yes	<p>The diagram in support of site specific guidance for site 2 proposes a new, consolidated, Strategic Industrial Location (SIL) boundary. GLA officers acknowledge that there are challenges in re-drawing the boundary at this site in a way which takes account of the approved outline application, however, the inclusion of non-SIL compliant uses within this boundary (residential and retail) does not accord with the principles of London Plan Policy 2.17, and is not supported.</p> <p>Given the benchmark established at this site by the approved outline application, officers are content that this issue does not amount to a concern of non-general conformity, however, the GLA would welcome further joint engagement with the Council to discuss various options</p>	Further options for re-drawing the SIL boundary need to be considered.	Yes	Following further discussion with the GLA, the Council has agreed that the consolidated SIL boundary should, as far as practical, exclude non-SIL compliant uses. It should therefore be amended to include Waverley Industrial Estate and the employment areas identified on the illustrative masterplan diagram for Site 2: Kodak, which accords to the granted outline planning permission – <b>see proposed minor modification no. AAP21</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					for presenting this diagram, and/or to refine the revised Wealdstone SIL boundary, before the submission stage.			
5	034	Greater London Authority	Site 2: Kodak and Zoom Leisure	Yes	In line with comments provided at the preferred options consultation stage, and following subsequent discussions with the Council, GLA officers will monitor the progress of the approved mixed-use redevelopment at this site, and will consider the strategic industrial designation of the Wealdstone Preferred Industrial Location accordingly, at the next review of the London Plan.	None	Yes	The Council will also monitor the progress of delivery of the approved mixed-use redevelopment of the site, and agrees that the most appropriate means by which to consider the long-term potential of the SIL designation is through the next review of the London Plan, and is happy to engage with the GLA in such discussions at that time.
5	035	Greater London Authority	Site 2: Kodak and Zoom Leisure	Yes	As discussed in representation 21 above, officers acknowledge that the site specific guidance has been brought into line with the approved planning application at the site. The supporting land uses now, therefore, include a large proportion of retail in this out of centre location. Whilst the GLA is content with the justification and mitigation embodied within the approved planning application at this site, for clarity, officers would welcome an acknowledgement in the supporting text that retail development in this location must not undermine the vitality and viability of nearby town centres.	Include an acknowledgement in the supporting text that retail development in this location must not undermine the vitality and viability of nearby town centres.	Yes	Not agreed. Both the Council and the GLA have stated they are content with this level of retail provision at this location, having already determined, in the course of granting outline planning permission, that this will not adversely impact on the vitality and viability of nearby town centres. To include a statement that the retail development in this location must not undermine the vitality and viability of nearby town centres would therefore be ultra vires. <b>No change</b>
21	116	Sandra-Lee Palmer	Site 2: Kodak	N/S	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.	Construct a comprehensive planning policy that protects <u>ALL</u> green open space for the present and future.	N/S	Harrow's adopted Core Strategy includes Policy CS1F which protects all existing open space (both public and private) from development. However, the Policy does allow for the reconfiguration of existing open space where this can improve access or quality without reducing the quantity of the open space. The development at Kodak accords to the latter by reconfiguring the open space currently on the former Zoom Leisure site and providing a new green corridor through both sites, linking Wealdstone town centre to Headstone Manor and beyond, without any net loss – in fact the Council notes that the scheme will result in a modest increase overall. <b>No change</b>

### AAP Opportunity Site 3: Teachers Centre

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
2	004	CIlr O'Dell	AAP Site 3: Teachers Centre	N/S	Teachers Centre - I oppose this site being used a school this will result in loss of amenity of my constituents by creating extra traffic congestion. The area is already severely affected by anti-social behaviour from the existing High Schools in the area. The area already lies within a CPZ any therefore any development of a school will add to the already recognised problems in the area.	Suggests respondent seeks the removal of the allocation of the site for D2 Education use. NB: no alternative use is offered by the respondent, so suggests the respondent wishes to see the site remain unallocated.	N/S	The site has a long history of education use, and therefore remains the Council's preferred option for a new secondary school, serving both the new Intensification Area as well as the wider borough. Further changes have been made to extend the boundary of site to take in the builder's yard on Cecil Road, the Whitefriars Industrial Estate and Aerospace House. The designation will provide for continued industrial use of these sites as well as for further education use, enabling the consideration of a much larger parcel of land to provide further options to accommodate a new school more comfortably on the site. It will also enable wider options to be considered to mitigate the traffic impacts arising from any school proposal. While TfL have modelled these impacts, the mitigation will need to respond to the final school proposal for the site, and being a free school, this remains unknown at this time. Further consultation with the community will therefore need to take place prior to application coming forward for a new school on the site. The

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
								Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. These requirements are specified in the AAP. <b>No change</b>
8	038	Mrs Sheridan Maple	Site 3: Teacher's Centre	N/S	Why as a resident have I not been consulted properly with regards to the Whitefriars Teacher site as I live a few minutes walk from this site. Have the council not looked at the traffic congestion this is going to cause to us as a resident. Also valuable outside space will be taken from us. Also we are surrounded by schools we do not need another one in this area. We are already suffering with gangs and all the trouble this brings. The place is dirty from rubbish that is dropped by all the children that use the surrounding areas. The traffic especially in the morning and early evening is particularly heavy as people use Cecil Rd ,Tudor Rd ,Toorack Rd ,Athelstone Rd ,Cypress Rd ,Whitefriars as a cut through from Headstone dr to get to Harrow Weald. We are also get alot of traffic from the Mosque in Whitefriars. The Mosque users park anywhere they can this goes on day and night but especially from early evening. Your parking restrictions are not working as you were told mosque times are from 12 to 2 your restriction are from 10 to 11 then 2 to 3. Completely useless. Have you not thought that the Col Art site would be much better to use as a school as you have the main road High Rd to take the traffic away from residential areas a much better use of space. The people of this area have suffered enough of changes especially when the council does not listen.	Suggests respondent seeks the removal of the allocation of the site for D2 Education use. NB: no alternative use is offered by the respondent, so suggests the respondent wishes to see the site remain unallocated.	N/S	Consultation on the proposals for the emerging Area Action Plan was advertised and undertaken widely (see Section 2 of this Consultation Statement and that published on the website in respect of consultation on the Issues and Options document and the Preferred Options document: <a href="http://www.harrow.gov.uk/downloads/file/11354/aap_reg_25_2012_representations">http://www.harrow.gov.uk/downloads/file/11354/aap_reg_25_2012_representations</a> The need for a new secondary school is identified in the Council's Infrastructure Assessment and Delivery Plan <a href="http://www.harrow.gov.uk/downloads/file/10168/infrastructure_assessment_and_delivery_plan">http://www.harrow.gov.uk/downloads/file/10168/infrastructure_assessment_and_delivery_plan</a> The site has a long history of education use, and therefore remains the Council's preferred option for a new secondary school, serving both the new Intensification Area as well as the wider borough. Further changes have been made to extend the boundary of site to take in the builder's yard on Cecil Road, the Whitefriars Industrial Estate and Aerospace House. The designation will provide for continued industrial use of these sites as well as for further education use, enabling the consideration of a much larger parcel of land to provide further options to accommodate a new school more comfortably on the site. It will also enable wider options to be considered to mitigate the traffic impacts arising from any school proposal. While TfL have modelled these impacts, the mitigation will need to respond to the final school proposal for the site, and being a free school, this remains unknown at this time. Further consultation with the community will therefore need to take place prior to application coming forward for a new school on the site. The Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. There is to be no net loss in the provision of open space on the site in accordance with Core Policy CS1F. These requirements are specified in the AAP. The ColArt site was considered and is being proposed for the expansion of the Salvatorian College, but the cost of acquiring the remainder of the site for a new school was deemed prohibitive. With respect to matters of rubbish and parking enforcement associated with use of the Mosque, these are matters outside the scope of the AAP. <b>No change</b>

#### AAP Opportunity Site 4: ColArt

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
2	003	Clr O'Dell	AAP Site 4: ColArt	N/S	ColArt Site - I oppose using this site for housing as the area is suffering from higher than average unemployment and the employment use must be retained. should be This will again lead to	Suggests the respondent seeks to retain the ColArt site in its existing industrial land	N/S	The Employment Land Review highlights the lack of demand for industrial uses in the borough, especially large industrial units. The key consideration for this site is in securing new jobs equivalent in number to that achieved when Colart were in operation. Enabling

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					loss amenity to my residents from extra traffic and air quality	designation		residential development will be required to deliver new employment space and community use, and therefore the allocation of the site for employment-led mixed use development has not changed. <b>No change</b>
16	099	Mr. Michael Loundes on behalf of Lindengruppen	Site 4: ColArt		Lindengruppen/ColArt welcomes the emphasis of the emerging policy on encouraging a mixed use development of the site where the value generated by high quality enabling housing can be harnessed to provide an appropriate and viable range of community benefits including jobs, education use and affordable housing use along with new public realm. The detailed comments made below are offered to ensure that the approved site specific policy will genuinely and viably support the achievement of the mutually shared vision for the site. 1. In order to support the viable provision of education land for an extension to the Salvatorian College it would be appropriate for the key diagram to be modified to show the potential use of the land to the north of the site currently shown as community/education use to be more appropriately identified for education/community/residential uses and for this revised designation to overlap the southern part of the land parcel currently shown only for education use.	Modify the site diagram to show the potential use of the land to the north of the site, currently shown as community/education use, to be education/community/residential uses and for this revised designation to overlap the southern part of the land parcel currently shown only for education use.	N/S	The Council agrees and understands, following pre-application discussions, that the amount of land required by the College for expansion has now been confirmed and would propose to amend the site illustration diagram to reflect this, and on the basis that the education land is set aside to remove the community use designation and amend the text accordingly – <b>see proposed minor modification no. AAP22</b>
16	100	Mr. Michael Loundes on behalf of Lindengruppen	Site 4: ColArt		The key diagram shows a 'key route' through land which cannot physically accommodate vehicles and pedestrians (third east-west route from the bottom). This alignment should be deleted and shown instead to replace that which is currently (fourth east-west route from the bottom) shown as a pedestrian only route. The north-south route linking the 'key routes' should also be shown as capable of accommodating circulation of all modes including pedestrians.	The key routes through the site require amending on the site diagram.	N/S	The Council agrees and acknowledges that, through pre-application discussions the key routes through the site had been amended and agreed but an error on the Council's part did not see these included in the site illustration in the Pre-Submission document – <b>see proposed minor modification no. AAP22</b>
16	101	Mr. Michael Loundes on behalf of Lindengruppen	Site 4: ColArt		It should also be noted that the former industrial buildings that sit behind the former office building are not physically or commercially capable of accommodating conversion to new or continued uses.	The reference to, and illustration showing, the possible retention of former industrial units, should be removed from the site diagram.	N/S	The Council agrees and acknowledges that, through pre-application discussions the possible retention of the industrial sheds been amended but an error on the Council's part did not see this amendment included in the site illustration in the Pre-Submission document – <b>see proposed minor modification no. AAP22</b>
19	110	Turley Associates	Site 4: ColArt	Yes	In order to support the viable provision of education land for an extension to the Salvatorian College it would be appropriate for the key diagram to be modified to show the potential use of the land to the north of the site currently shown as community/education use to be more appropriately identified for education/community/residential uses and for this revised designation to overlap the southern part of the land parcel currently shown only for education use.	Modify the site diagram to show the potential use of the land to the north of the site, currently shown as community/education use, to be education/community/residential uses and for this revised designation to overlap the southern part of the land parcel currently shown only for education use.	N/S	The Council agrees and understands, following pre-application discussions, that the amount of land required by the College for expansion has now been confirmed and would propose to amend the site illustration diagram to reflect this, and on the basis that the education land is set aside to remove the community use designation and amend the text accordingly – <b>see proposed minor modification no. AAP22</b>
19	111	Turley Associates	Site 4: ColArt	Yes	The key diagram shows a 'key route' through land which cannot physically accommodate vehicles and pedestrians (third east-west route from the bottom). This alignment should be deleted and shown instead to replace that which is currently (fourth east-west route from the bottom) shown as a pedestrian only route. The north-south route linking the 'key routes' should also be shown as capable of accommodating circulation of all modes including pedestrians.	The key routes through the site require amending on the site diagram.	N/S	The Council agrees and acknowledges that, through pre-application discussions the key routes through the site had been amended and agreed but an error on the Council's part did not see these included in the site illustration in the Pre-Submission document – <b>see proposed minor modification no. AAP22</b>
19	112	Turley Associates	Site 4: ColArt	Yes	It should also be noted that the former industrial buildings that sit	The reference to, and illustration	N/S	The Council agrees and acknowledges that, through pre-application

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					behind the former office building are not physically or commercially capable of accommodating conversion to new or continued uses.	showing, the possible retention of former industrial units, should be removed from the site diagram.		discussions the possible retention of the industrial sheds been amended but an error on the Council's part did not see this amendment included in the site illustration in the Pre-Submission document – <b>see proposed minor modification no. AAP22.</b>

### Sub Area Wealdstone Central

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
13	083	CgMs on behalf of MOPAC and the Metropolitan Police	Chapter 5, Sub Area: Wealdstone Central	N/S	<p><i>Wealdstone Police Station</i></p> <p>As per our November 2010 reps towards the 'Call for Sites' consultation and our comments towards the Harrow &amp; Wealdstone AAP in June 2011 and February 2012, the MOPAC/MPS recommend that Wealdstone Police Station is allocated for a residential-led development within the emerging AAP.</p> <p>The designation of particular policing facilities for redevelopment allows the MOPAC/MPS to implement their Estate Strategy which is seeking better and more accessible facilities and services to serve community policing and the disposal of exiting older properties which are no longer fit for purpose or inefficient to maintain. A key aspect of the Strategy is that there will be no closures until replacement facilities have been found and are fully operational which ensures that effective borough policing can be maintained.</p> <p>Wealdstone Police Station has been identified as being surplus to requirements. The previous operations from the site are therefore being relocated to Harrow Police Station and within the Harrow Civic Centre.</p> <p>The consideration of alternative uses at the site is consistent with Saved UDP Policy C2 which allows the loss or change of use of community facilities where a suitable replacement is identified.</p> <p>In terms of potential alternative uses, the building lends itself to residential conversion due to its Grade II Listed status. In addition, the yard area to the rear of the site could provide a mix of uses including, but not limited to, residential, commercial and office floorspace.</p> <p>Given the site's location in the District Centre and primary shopping frontage, a mixed-use development would be entirely appropriate and in accordance with the NPPF, London Plan and Harrow's adopted Core Strategy. Furthermore, draft Policy AAP17 states that within primary shopping frontages, the use of ground floor premises for retail, financial and professional activities, restaurants &amp; cafés and pubs &amp; bars will be permitted provided that:</p> <ul style="list-style-type: none"> <li>• The length of the primary frontage in non-retail use at street level in the centre (excluding any extant planning permissions) would not exceed 25%;</li> <li>• The proposal would not result in a concentration of more than unit frontages in non-retail use;</li> <li>• The use would not create inactive frontage during the day;</li> </ul>	Include Wealdstone Police Station within the AAP site allocations for a residential-led development.	N/S	<p>Officers of Harrow Council meet with the agents for MOPAC and the Metropolitan Police following representations made to the AAP Preferred Option consultation. At that meeting, the Council agreed that the redevelopment of the existing Wealdstone Police Station could form part of the AAP site allocations, as it would help contribute to the regeneration of Wealdstone. However, the Council clarified that Core Policy CS1Z resists the loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities. The Council therefore requested that MOPAC and the Metropolitan Police Service provide such evidence as appropriate (e.g. an up-to-date estates management strategy) to satisfy the policy requirements and demonstrate how the Borough's policing accommodation needs were to be met that would then justify releasing this site from community use. The Council informed the agents that without such evidence it would not be possible to allocate the site for an alternative use within the AAP as this would be contrary to the Core Strategy, noting also that the requirement for robust and credible evidence led-plan making had not altered under the NPPF.</p> <p>The agents acting on behalf of MOPAC and the Metropolitan Police advised that they would get back to the Council and supply such evidence as appropriate to satisfy the Council's requirements. However, no such evidence was received by the Council to consider prior or subsequent to preparing and consulting on the AAP Pre-Submission document, and as such the site was not included as a site allocation within the AAP Pre-Submission document.</p> <p>The Council's position was again clearly set out in its response to the MOPAC and Metropolitan Police Service AAP Preferred Option representation (see the Cabinet paper report of 20 June 2012 and the Regulation 21(1)(c) Consultation Statement that was published on the Council's website alongside consultation on the AAP Pre-Submission document).</p> <p>Notwithstanding the above, the non-allocation of the site within the AAP would not prevent the site from coming forward for redevelopment at any time over the life of the Plan. Subject to appropriate evidence being submitted to satisfy the requirements of Core Policy CS1Z, a proposal for redevelopment of the site would be determined in accordance with the relevant policies of the AAP and the objectives for this sub-area.</p> <p><b>No change</b></p>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					<p>and</p> <ul style="list-style-type: none"> <li>The use would not be detrimental to the amenity of neighbouring occupiers or highway safety.</li> </ul> <p>The area surrounding the site comprises a range of different uses although the High Street consists primarily of commercial uses at ground floor level with accommodation above. Neighbouring the site to the south, fronting the High Street, is a former public house. Planning permission was granted in August 2011 for redevelopment to provide 3/6 storey block of 31 flats and 675 sq. m. of retail floor space (LPA ref. P/2241/09). Development of this site is yet to commence. Adjacent to this a development is emerging which comprises 51 residential units on the land fronting the A409 (LPA ref. P/1770/09). Opposite the Police Station across the A409 are Swanley House and Christie House, are 6-storey residential apartments. The allocation of this site for residential-led redevelopment would therefore be in keeping with the neighbouring uses.</p> <p>The residential allocation would also comply with the NPPF's requirement for local planning authorities to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres and to recognise that residential development can play an important role in ensuring the vitality of centres (para 23).</p> <p>Balanced with this is the need for housing. The NPPF states that <i>'local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty home strategies... they should normally approve planning applications for change to residential use and any associated development from commercial buildings where there is an identified need for additional housing in that area, provided there are not strong economic reasons why such development would be inappropriate'</i> (para 51). Whilst the Council can demonstrate a 5-year supply of housing to meet the Mayor's target, this target represents a <b>minimum</b> and is appropriately assessed in parallel with London Plan Policy 3.4 which requires development plan preparation to optimise housing output.</p> <p>For the above reasons, the allocation of the Wealdstone Police Station site for residential-led mixed use redevelopment will ensure consistency with the NPPF, London Plan and Harrow's emerging Local Development Framework and will ensure that an effective police service can be maintained across the Borough.</p>			

#### AAP Opportunity Site 5: Wealdstone Infills

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
18	108	Environment Agency	Site 5: Harrow and Wealdstone	Yes	The development proposed in the Key Site area 5 (Wealdstone Infills) includes a proposal for 'housing with mixed use commercial' adjacent to the existing railway line. This site, named 'Harrow and Wealdstone Station Car Park' in the Level 2 SFRA draft addendum has significant	None	N/S	The comments are noted. The Council will require any proposal for redevelopment of this site to be accompanied by a detail Flood Risk Assessment and will, in the course of pre-application discussions and/or determining any planning application for the site, liaise with



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
			Car Park		flood risk to the site. We would like to raise awareness that developers may find it difficult to meet the AAP9 Policies, DM Policies and the requirements of the NPPF on this site as it is heavily constrained by a large percentage of the site lying within your Flood Zone 3a and with over 2.2m depth of water on site.			the Agency to seek their advise and input to ensure the final development is both appropriate and addresses the significant flood risk identified for the site.
18	109	Environment Agency	Site 5: Harrow and Wealdstone Car Park	Yes	Key Site area 5 (Wealdstone Infills) includes a proposal for 'housing with mixed use commercial' adjacent to the existing railway line. This site, named 'Harrow and Wealdstone Station Car Park' in the Level 2 SFRA draft addendum has significant flood risk to the site. We would like to raise awareness that developers may find it difficult to meet the AAP9 Policies, DM Policies and the requirements of the NPPF on this site as it is heavily constrained by a large percentage of the site lying within your Flood Zone 3a and with over 2.2m depth of water on site.	None	N/S	The comments are noted. The Council will require any proposal for redevelopment of this site to be accompanied by a detail Flood Risk Assessment and will, in the course of pre-application discussions and/or determining any planning application for the site, liaise with the Agency to seek their advise and input to ensure the final development is both appropriate and addresses the significant flood risk identified for the site.

#### **AAP Opportunity Site 6: Palmerstone Road/ George Gange Way**

No comments received

#### **Sub Area Wealdstone East**

No comments received

#### **AAP Opportunity Site 7: Harrow Leisure Centre**

No comments received

#### **AAP Opportunity Site 8: Civic Amenity Site**

No comments received

#### **Sub Area Station Road**

No comments received

#### **AAP Opportunity Site 9: Civic Centre**

No comments received

#### **AAP Opportunity Site 10: Station Road Opportunity Area**

No comments received

#### **AAP Opportunity Site 11: Tesco**

No comments received

#### **AAP Opportunity Site 12: Greenhill Way North**

No comments received

### AAP Opportunity Site 13: Greenhill Way Car Park

No comments received

### Sub Area Harrow Town Centre West

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
9	055	Irene Wears on behalf of Campaign for a Better Harrow Environment	Sub area: Harrow Town Centre West	Yes	<b>Harrow Town Centre West</b> - We welcome the change of name for this sub-area and the adjustment to the boundary which should safeguard the southern edge of the Harrow Recreation Ground. We note that the land to the west of Neptune Point, between the railway and Pinner Road, is not mentioned as a key site. It is a large site, including housing as well as warehouses and if there are plans for its development they should be stated. Any new developments will need very sensitive transitional elements to blend into surrounding residential areas.	If there are plans for redevelopment of land to the west of Opportunity Site 14, the AAP should allocate and specify what is proposed for this area.	N/S	The land to the west of the new Neptune Point development was included within the Intensification Area boundary because it is a large site bordering the town centre boundary. However, it was not allocated as a potential development site within the AAP because the site continues to provide suitable industrial accommodation. <b>No change</b>

### AAP Opportunity Site 14: Neptune Point

No comments received

### AAP Opportunity Site 15: Bradstowe House

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
11	078	Louise Leadbeater - Roxborough Residents Association	Site 15: Bradstowe House	N/S	Planning permission for this was granted some years ago, at a time when permissions were granted on a more ad hoc basis than they are today. Given the close consideration the Council now gives to design of buildings and how they fit in to the surroundings, we would not have thought this project, if it were submitted for planning today, would receive Council approval in its current form. The adjacent underpass is highlighted in the AAP as a key pedestrian link and the building does nothing to enhance this link. We appreciate the Council must still be in discussions with the administrators, or their successors over the future of this site, however we think the wording in the design considerations could be more specific. Although this is a consented scheme, the applicant is in breach of its S106 commitments and an opportunity would appear to exist for the Council to force the arm of the current owner to create a design so that it compliments nearby Neptune Point and enhances the use of the underpass.	The wording in the design considerations could be more specific – however, no suggested wording provided	N/S	As the respondent states, this is a consented and implemented scheme – although stalled due to economic conditions. The priority for the Council is to see this development completed, and therefore the Council may need to be flexible rather than rigid in its negotiations with any new owner. However, if there are better outcomes to be achieved (i.e. through alignment of any renegotiated obligations with the AAP and Sub Area objectives), then the Council will pursue these, including design considerations and urban realm improvements. <b>No change</b>

### AAP Opportunity Site 16: College Road West

No comments received

### Sub Area Harrow Town Centre Central

No comments received

### AAP Opportunity Site 17: Havelock Place

No comments received

**AAP Opportunity Site 18: 17 – 51 College Road**

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
9	056	Irene Wears on behalf of Campaign for a Better Harrow Environment	Site 18: 17 - 51 College Road	Yes	<b>Harrow Town Centre Central</b> - With respect to site 18 (17-51 College Road) we acknowledge that this is potentially a larger site than previously considered and should therefore offer opportunities for more mixed uses and more coherent public realm. However we note too that site constraints may affect the eventual design and layout. We will not therefore comment further at this point. Instead, we look forward to seeing the developer's proposals in due course and we shall comment at that stage.	None	N/S	Noted
9	057	Irene Wears on behalf of Campaign for a Better Harrow Environment	Site 18: 17 - 51 College Road	Yes	<b>Harrow Town Centre Central</b> - One aspect that does concern us at this stage is the acceptance of a 19 storey building in principle on this site, so close to Harrow Hill. We acknowledge that this was the opinion of the Planning Inspector at the previous appeal and that this opinion was accepted at the Examination-in-Public of the Core Strategy. However since then new evidence has emerged which we feel offers a strong argument against a building of such height. According to the independent assessment of protected views (2012), site 18 lies in the yellow consultation zone of 3 viewpoints, Grove Open Space, Old Redding and the Roxborough footbridge, and within the red viewing corridor of a fourth, Wood Farm. Surely such convergence of views should be taken account of. Furthermore the London Plan Management Framework states that development that exceeds the threshold in the red viewing corridor 'is likely to harm the viewer's ability to recognise and appreciate the landmark'. Policy 3 (chapter 2) of the Development Management Policies DPD reflects this, stating that 'development should not exceed the threshold height of a landmark viewing corridor (shown in red)'. While the opinions of Planning Inspectors are obviously important, in this instance it places the Council in the difficult position of having to ignore their own evidence base. We therefore feel that this issue should be re-examined.	Re-examine the issue of the acceptance in principle of an up to 19 storey building on Opportunity Site 18: 17- 51 College Road.	N/S	The fact that the Council has undertaken a new Views Assessment does not overcome the material acceptance in principle of a tall building of up to 19 storeys on Site 18: 17 – 51 College Road. A key tenet of the planning system remains that planning applications be determined in accordance with the policies of the local plan, unless material considerations indicate otherwise. As an evidence base, the Views Assessment is not concerned with individual sites, rather it is a borough-wide study undertaken to inform the View Management policies of the Development Management Policies DPD and the Area Action Plan. As such, it cannot be used to make irrelevant any matter which is a material consideration in a particular case. <b>No change</b>
10	068	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, redline boundary	No	Site 18 – Our client objects to the inclusion of 51 College Road as part of a wider Site 18 and is of the view that the site should be considered independently of neighbouring properties, as per the previous drafts of the AAP. Whilst the Council's desire to bring about comprehensive redevelopment of this part of the Metropolitan Centre is acknowledged this could essentially be a timely and fruitless exercise, whereas our client has continually expressed a desire to bring its land holding forward. Whilst our client acknowledges the need to consider neighbouring properties there appears to be no reason for 51 College Road not be pursued as an individual site.	Identify 51 College Road as an individual site	N/S	The Council broadly agrees. It was the Council's understanding, through discussion with the agents, that layout and design considerations for the redevelopment of the former post office were constrained by existing adjoining buildings. The intention behind including the adjoining sites within the allocation boundary was to allow for such constraints to be potentially overcome through a workable solution for the whole site that enabled the development at 51 College Road to be delivered without constraint to the existing context, regardless of the timing of subsequent phases. However, this is predicated on a whole site solution being agreed between the parties. Where such an agreement can not be reached, prior to planning permission being sought for any individual parcel of land within the site, the Council agrees that the individual parcels should still be allowed to come forward for redevelopment on their own but on the understanding that the existing neighbouring property context still prevails. The Council therefore considers it appropriate to clarify this in both the Site Constraints and Delivery sections of the allocation – <b>see proposed minor modifications no. AAP27 and AAP31</b>
10	069	CBRE on behalf of	Site 18: 17-51	N/S	They support the Key Site Objectives but would recommend that	Amend Objective 5 to include	N/S	It is not clear what is meant by 'a landmark marker'? The Council

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
		Dandara Ltd	College Road, Objective 5		Objective 5 be expanded to include, at the end of the existing text the words: "...and establish a landmark marker for Harrow town centre".	"...and establish a landmark marker for Harrow town centre".		considers the existing objectives to be sufficient and clear without the inclusion of the suggested wording. <b>No change</b>
10	070	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Objective 6	N/S	Whilst opening up a new view(s) to St Mary's Church from the site is generally supported this should be flexible, in that the redevelopment of the site and the benefits for the Metropolitan Centre should be the key driver. The provision of such view(s) should be secondary to this and only be incorporated where possible where this would not have a negative impact on the design and layout of any development proposals. If the development provides such view(s), and notwithstanding our comments below, the Council should not also seek the provision of a viewing gallery/platform at roof level (para 4.70).	N/S	N/S	Consultation on the Core Strategy and the AAP has highlighted the visual disconnect between the town centre and Harrow on the Hill. While the Council agrees that redevelopment of the site is a priority, hence the site's allocation within the AAP, the Council maintains that one of the key objectives of such redevelopment is to open up a new view(s) to St Mary's Church, helping to reconnect and strengthen the relationship between the town centre and Harrow Hill, as a feature of significant cultural and historic importance to the Borough. The opening up of a new view(s) from within the site, and provision for tall buildings to incorporate publicly accessible areas on the upper floors, where appropriate, are two separate requirements. The Council considers there is no compelling argument to warrant a compromise or trade-off between the requirements, when redevelopment of the site offers the potential to deliver both outcomes sought. <b>No change</b>
10	071	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Leading and Supporting Land Uses	Yes	The Leading and Supporting Land Uses are all supported and our client is grateful for clarification that these are targets and not minimum numbers and has assumed that this remains the case. In addition, it should be noted that the actual number of units will depend ultimately on the mix of the development, together with need/demand and this creates the flexibility required. Consequently a smaller number of unit may, as part of a mixed use scheme ultimately come forward.	N/S	N/S	Support for the changes made to the leading and supporting land uses and housing targets, as a result of consultation at the AAP Preferred Option stage, is noted. As are the comments regarding actual unit numbers to be delivered.
10	072	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Design Considerations	N/S	Design Considerations – The first paragraph only highlights two elements of the Secretary of State's decision that was deemed acceptable.	Accordingly the paragraph should be amended to read as follows: <i>"The Secretary of State has already accepted that a tall building, up to 19-storeys in height, on this site is acceptable having regard to the urban design and views analysis work already undertaken. He has also stated that it would be acceptable for a building of this height to project above the Harrow Weald Ridge and that it would not adversely the character and setting of the adjoining conservation area, listed buildings or metropolitan open land provided that world class architectural design is achieved."</i>	N/S	The Council has read through the Secretary of State's decision letter of 22 July 2010, and the Planning Inspector's report, in particular paragraphs 159-171, and is satisfied that the wording of the AAP is an accurate reflection of their findings. <b>No change</b>
10	073	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Site Constraints, 4 <sup>th</sup> paragraph	N/S	Paragraph 4 refers to the opportunity to provide physical and visual permeability into, within and through the site and specifically that there should be "...the creation of new views to St Mary's Church". This issue is also picked up in the Key site Objectives, Site Constraints/Dependencies and Concept Diagram. The text is explicit that the requirement is to provide new views from the site but this is not reflected in the concept diagram and accordingly the diagram	Seeks flexibility to ensure there is no pre-conceived idea as to where the newly created view(s) should be located and that the creation of such view(s) will not be at the expense of design or economic redevelopment	N/S	As stated previously, and clearly stated in the AAP, the conceptual illustrations are not intended to be prescriptive. The reason for showing the creation of a new view(s) as extending from College Road was to highlight the fact that the new view(s) could be created anywhere along this view cone corridor, rather than limiting the consideration to the creation of a new view(s) only within the site, accepting however, that the latter is likely to be the most plausible

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					should be appropriately amended given the sites wider constraints, as identified across the AAP DPD, design constraints should not seek to restrict how the physical design of the site might come forward and this could stifle innovation, the achievement of architectural quality and the delivery of the wider objectives for Harrow Town Centre. The requirement to provide views across the site, as annotated within the concept diagram, will sterilise large areas and will limit the exploitation of the sites potential. As for views from within the site towards St Mary's, our client has reservations as to the inclusion and potential impacts of such a requirement, as stated above, and whilst accepting the objective to provide such view(s) seeks flexibility to ensure there is no pre-conceived idea as to where these should be located and that the creation of such view(s) will not be at the expense of design or economic redevelopment objectives. Their understanding is that this is what is intended but this is not, in their judgement, what is currently reflected in the Site 18 parameters as a result of the conceptual diagram.	objectives.		outcome and therefore the opportunity identified within the text. With respect to flexibility, the Site Constraints and Design Considerations sections of the allocation are clear that the site offers the <u>opportunity</u> to open up new view(s) to St Mary's Church from within the site. The Council would therefore expect all opportunities to be explored and for robust justification to be provided should a proposal be put forward that did not realise this opportunity. <b>No change</b>
10	074	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Design Considerations, 7 <sup>th</sup> paragraph	No	In respect of the requirements for a tall landmark building and the need to meet the policy requirements of APP6, our client's objections in respect to this policy, as stated above, are reiterated above. At paragraph 7 our client objects to the use of the word 'significantly'. This is ambiguous and undefined and any development should be brought forward on the basis of a comprehensive urban analysis and on the basis of architectural quality as required by the London Plan and Core Strategy. They would propose the deletion of the words "...and significantly subordinate".	Delete the words "...and significantly subordinate".	N/S	The wording of the paragraph simply reiterates the requirements of Policy AAP6F, the justification for which is set at out paragraphs 4.57 to 4.61 to that Policy. <b>No change</b>
10	075	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Site Specific Infrastructure	No	Our client objects strongly to the requirement to provide an Upper Level amenity area for the reasons set out previously. Further, both a viewing platform and the creation of a view to St Marys Church could significant compromise the design, viability and deliverability of a significantly constrained site. The main objective for this site has to be its positive redevelopment and contribution to the Metropolitan Centre.	Delete requirement to provide an upper level amenity area.	N/S	The Council agrees. The terminology used is not consistent with that of Policy 7.7 C (h) of the London Plan – <b>see proposed minor modification no. AAP30</b>
10	076	CBRE on behalf of Dandara Ltd	Site 18: 17-51 College Road, Delivery	No	Our client is expecting to submit an application in early 2013 with a projected completion of 2016. Whilst they appreciate the Council's desire to include adjoining pockets of land, they have previously demonstrated that the land in their ownership can be brought forward without compromising the subsequent delivery of these additional sites in the future. This was quite clearly accepted in the Secretary of State's appeal decision. As stated previously our client is of the view that the inclusion of sites outside of their ownership within Site 18 is misleading as it is unlikely that they will ever be comprehensively developed. This is equally recognised within the Delivery section. There should be no requirement on our client to comprehensively design development for a wider site area than they have control of because they will progress their site before others are in a position to be brought forward.	Recommend that a final paragraph be added to this section which states that: <i>"The first phase of any development of this site should set the design parameters for subsequent phases as and when these occur. The development of Phase 1 should not compromise future delivery of these areas nor should those areas stifle or prevent the development of the former Post Office section of the site"</i> .	N/S	The Council broadly agrees. It was the Council's understanding, through discussion with the agents, that layout and design considerations for the redevelopment of the former post office were constrained by existing adjoining buildings. The intention behind including the adjoining sites within the allocation boundary was to allow for such constraints to be potentially overcome through a workable solution for the whole site that enabled the development at 51 College Road to be delivered without constraint to the existing context, regardless of the timing of subsequent phases. However, this is predicated on a whole site solution being agreed between the parties. Where such an agreement can not be reach, prior to planning permission being sought for any individual parcel of land within the site, the Council agrees that the individual parcels should still be allowed to come forward for redevelopment on their own but on the understanding that the existing neighbouring property context still prevails. The Council therefore considers it appropriate to clarify this in both the Site Constraints and Delivery sections of the allocation – <b>see proposed minor modifications no. AAP27 and AAP31</b>

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
15	089	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Objectives	Yes	Our client continues to support the proposed key site objectives. We consider that no amendments need to be made to this section.	None	N/S	AIB Ltd's support for the key site objectives for Site 18 is welcomed and noted.
15	090	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Land Uses	N/S	It is not clear whether the list of 'leading' and 'supporting' land uses are requirements (i.e. they must all be provided in order to accord with the AAP) or whether they are a list of acceptable uses that can be selected from (our assumption). In order to provide clarity, we recommend that these should be re-titled as 'acceptable leading' and 'acceptable supporting' land uses in order to confirm the position. We agree that Class D1 use is appropriate for a town centre site such as this however, bearing in mind the scale of the proposed development and the lack of evidence to demonstrate how this use could be funded, it is inappropriate to include this as a 'leading' use (on delivery grounds). We recommend that this use is reclassified from an 'acceptable leading land use' to an 'acceptable supporting land use'. Our client welcomes the additional flexibility provided by supporting a range of town centre uses on this site (which now includes Class A2, A4, D2, B1, C1 and C2 uses). These land uses are appropriate to this location and the flexible range of uses help to enable a viable development scheme to come forward on the site, tailored to meet local needs arising and future market demand.	Recommend that 'Leading land use' and 'Supporting land use' be re-titled 'acceptable leading' and 'acceptable supporting' land uses.  And that  The Class D1 use is reclassified from an 'acceptable leading land use' to an 'acceptable supporting land use'.	N/S	Paragraph 5.2 of the introductory text to Chapter 5: Sub Area and Site Specific Guidance, clarifies that a leading use(s) and supporting uses are specified to direct the nature of the acceptable mix of uses for the site. <b>No change</b>  With respect to the Class D1 use, the Council maintains that this is a leading land use for the site. Funding sources are listed in the Infrastructure Schedule at Chapter 6. <b>No change</b>  The Council welcomes the acknowledgment of the changes made to the Pre-Submission draft of the AAP as a result of the comments received to consultation at the Preferred Option stage.
15	091	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Target Outputs	Yes	The target outputs for the site are supported by our client.	None	N/S	AIB Ltd's support for the target outputs for Site 18 is welcomed and noted.
15	092	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Site Description	Yes	The site description is also supported by our client.	None	N/S	AIB Ltd's confirmation of the site description for Site 18 is welcomed and noted.
15	093	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Site Constraints / Dependencies , 2 <sup>nd</sup> paragraph	N/S	In general our client supports the majority of the identified site constraints and dependencies. We note that the area of land relating to this site-specific allocation has now been extended to incorporate the buildings to the north east of the former Royal Mail sorting office. Site 18 now relates to 17-51 College Road, which comprises two separate land parcels. Our client is concerned about the wording of the second paragraph in this section, which specifically relates to the ambition to achieve a comprehensive solution for the whole site. We consider that this paragraph is confusing when read alongside the two last paragraphs in the 'Delivery' section, which supports the delivery of 2 separate developments on this site. While the principle of a site-wide approach is understandable we must ensure that this does not prejudice the redevelopment of the former Royal Mail site which is available for development now (unlike the remainder of the site which is subject to land assembly issues). We request that the paragraph in the 'Site Constraints' section is reworded to ensure that any future development on this site is not constrained or limited by the availability at any given time of the adjacent parcel of land.	We suggest that this paragraph is rephrased as follows: <i>'Site 18 comprises two distinct parcels of land which are under different ownerships. The former post office land is available for development now while the availability of the remainder of the site is dependant on land assembly. Land availability issues with the remainder of the site should not delay or compromise the early development of the former post office site and therefore the Council will accept separate planning applications for each land parcel. Proposals will be expected to demonstrate that they do not prejudice the delivery of development on the remainder of the site and that they</i>	N/S	The Council broadly agrees. It was the Council's understanding, through discussion with the agents, that layout and design considerations for the redevelopment of the former post office were constrained by existing adjoining buildings. The intention behind including the adjoining sites within the allocation boundary was to allow for such constraints to be potentially overcome through a workable solution for the whole site that enabled the development at 51 College Road to be delivered without constraint to the existing context, regardless of the timing of subsequent phases. However, this is predicated on a whole site solution being agreed between the parties. Where such an agreement can not be reached, prior to planning permission being sought for any individual parcel of land within the site, the Council agrees that the individual parcels should still be allowed to come forward for redevelopment on their own but on the understanding that the existing neighbouring property context still prevails. The Council therefore considers it appropriate to clarify this in both the Site Constraints and Delivery sections of the allocation – <b>see proposed minor modifications no. AAP27 and AAP31</b>



ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
						contribute to the achievement of site wide objectives'.		
15	094	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Design Consideration s	N/S	Our client supports the recognition that the final design and layout of development on the site may be 'wholly different to the conceptual illustration' provided. This enables a design led approach to come forward to achieve the highest quality design for the site. Overall, our client supports the majority of the design considerations put forward. However, we remain concerned that some of the design considerations remain overly prescriptive and may not enable the most flexible and viable design to be achieved on the site. Our main concerns relate specifically to building heights and provision of civic/community uses, as detailed below:	None	N/S	Support for the majority of the design considerations is noted as are the concerns regarding building heights and provision of civic/community uses, which the Council addresses below.
15	095	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Design Consideration s: Building Heights	N/S	We support the retention of policy support for a tall building of up to 19 storeys in height to be delivered on the site. This has been deemed as acceptable by the Secretary of State on the basis of sound design-based evidence and is a wholly logical policy position to take. Our client welcomes the opportunity to provide a quality landmark for the town centre to make a significant positive contribution to the town centre and the Harrow skyline. As per the illustrative design guidance, the site has capacity to accommodate further buildings in addition to the 19-storey principal building. The draft AAP requires these buildings to have building heights of 8-10 and 5-7 storeys (a reduction in the scale proposed in the Preferred Option draft). We consider there to be no evidence or justification to support such prescriptive building heights and it is our view that this does not allow for sufficient flexibility to allow the most appropriate design-led scheme to be brought forward.	Accordingly, we recommend that the guidance on building heights for the further/supporting buildings is relaxed to require a design-led approach to determining height, massing and scale, which should specifically allow for taller buildings, as opposed to setting heights at this stage.	N/S	The building heights shown on the illustrative diagram and set out in the Design considerations are derived from the Urban Character Assessment undertaken by East and responds to the requirements of Policy AAP6F that, where a proposal for a tall landmark building includes the development of other buildings on site, the height of all other buildings shall be significantly subordinate to the tall landmark building. The justification for the policy requirement is set at out paragraphs 4.57 to 4.61. Paragraph 4.61 also confirms that clusters of tall buildings are inappropriate within the context of the Heart of Harrow. The Council considers that the prescribed building heights respond to the local and wider context, and therefore, it will be for the developer to robustly justify through their proposed design, the case for heights in excess of those outlined <b>No change</b>
15	096	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road Design Consideration s: Civic and Community Uses	N/S	In relation to the final paragraph in this section, we do not consider this paragraph (which relates to provision of civic and community uses on the site) should be included as a 'Design Consideration'. The support for provision of Class D1 civic/community uses is identified in the acceptable land uses section and therefore there is no purpose for this inclusion and we request that this paragraph is removed.	Request that the last paragraph of the Design Considerations is removed.	N/S	The Council agrees that the provision of civic and community uses on the site is already identified in the leading land use and that the paragraph adds little in terms of design considerations. However, in preference to removing the paragraph, the Council considers the paragraph should be amended to include design considerations for the locating of civic and community uses within the site – <b>see proposed minor modification no. AAP29</b>
15	097	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Site Specific Infrastructure	No	Whilst we support the principle of providing community uses on this site as an 'acceptable supporting land use', our client is concerned about the specific reference to a new Harrow Central Library, on the basis that this requirement could have a significant impact on the viability of development. The Council has provided no evidence to demonstrate how such a facility could be funded or who/how it could be delivered. This questions whether or not the proposal is deliverable which suggests that this requirement is not sound.	In order to ensure that a viable and deliverable solution can be brought forward we recommend that the specific requirement/reference to a new Harrow Library should be deleted.	N/S	The details of the requirement for the new Central Library are provided in the Council's Infrastructure Assessment and Delivery Plan. Funding sources for the provision of the new Central Library are listed in the Infrastructure Schedule at Chapter 6. <b>No change</b>
15	098	GVA on behalf of AIB Ltd	Site 18: 17 to 51 College Road, Delivery	N/S	Reflecting that the site has now been extended and incorporates the development of the land adjoining the north east of the former Royal Mail sorting office, we are pleased that the Council acknowledges that the development of the site is 'likely to come forward in at least two phases'. It is of paramount importance to our client that the redevelopment of the site is not held back or constrained in any way by the lack of availability of the adjacent land. Our client remains committed to supporting the redevelopment of the former Royal Mail sorting office. The deliverability of the site requires an effective site-specific policy in the Harrow AAP, which is sufficiently flexible to	None	N/S	AIB Ltd's in principle support for the draft AAP proposals in relation to Site 18 are noted, as are the outstanding concerns outlined. The Council welcomes AIB Ltd's continual engagement in the AAP and shares AIB Ltd's desire to see this important town centre site brought forward for redevelopment.

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
					develop a viable scheme. We have expressed our client's remaining concerns about the wording of the site-specific policy, which we consider need further refinement and amendment through the schedule of minor amendments to be submitted to the approved AAP Inspector. Overall our client maintains its support for the Pre-Submission draft AAP proposals in relation to Site 18 in principle, however there are our outstanding concerns which we consider could be positively addressed to ensure the future viability of a development proposal coming forward.			

#### AAP Opportunity Site 19: Harrow on the Hill Car Park West

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
20	113	Transport for London Property Development	Site 19: Harrow on the Hill car park west  & Site 21: Harrow on the Hill car park east	Yes	TfL has a number of landholdings within the spatial scope of the Document. These are referenced as follows:  Proposal Site 19: Harrow on the Hill car park west Proposal Site 21: Harrow on the Hill car park east  A copy of TfL land holdings relating to the above sites is attached for your reference.  Overall TfL Property welcomes 'in principle' the inclusion of TfL land within Proposal Sites 19 and 21 subject to London Underground Limited's need to safeguard operational activities associated with site 19 which includes staff car parking and train crew accommodation. In addition, to the north west of the site is a London Underground Limited substation to which access will need to be retained as part of any future development.	None	N/S	TfL Property's in principle support for the allocation of these two sites within the AAP is welcomed and noted. With regard to the need to safeguard operational activities associated with Site 19, and the need to retain access to the substation, the Council considers it appropriate that these requirements be added as a site constraint – <b>see proposed minor modification no AAP32</b>
20	114	Transport for London Property Development	Site 19: Harrow on the Hill car park west  & Site 21: Harrow on the Hill car park east	Yes	TfL is currently producing Feasibility Studies for both sites which will inform the viability and deliverability of any future scheme brought forward. It should be noted that without the agreement from TfL Property to release the land for the proposed uses set out in sites 19 and 21, the designation as illustrated is undeliverable. However TfL Property is happy to work with the Borough and potential developers to realise the Boroughs vision for the sites set out in the Harrow and Wealdstone Area Action Plan.	None	N/S	The comments are noted, and the Council welcomes the opportunity to continue to work with TfL property to realise future redevelopment of these sites.
20	115	Transport for London Property Development	Site 19: Harrow on the Hill car park west  & Site 21: Harrow on the Hill car park east	Yes	<b>Conclusion</b> TfL Property would welcome the opportunity to meet with the Borough to discuss the sites, current operational activity and their future development potential. Furthermore the delivery of any proposals for high quality developments can only be achieved through the support of planning policy. We suggest that the above points are considered to ensure the Pre Submission Harrow and Wealdstone Area Action Plan is 'sound' and policies are clear and robust.	None	N/S	The comments are noted, and the Council welcomes the opportunity to continue to work with TfL property to realise future redevelopment of these sites.

## AAP Opportunity Site 20: Lowland Recreation Ground

No comments received

## AAP Opportunity Site 21: Harrow on the Hill Car Park East

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
20	113	Transport for London Property Development	Site 19: Harrow on the Hill car park west  &  Site 21: Harrow on the Hill car park east	Yes	TfL has a number of landholdings within the spatial scope of the Document. These are referenced as follows:  Proposal Site 19: Harrow on the Hill car park west Proposal Site 21: Harrow on the Hill car park east  A copy of TfL land holdings relating to the above sites is attached for your reference.  Overall TfL Property welcomes 'in principle' the inclusion of TfL land within Proposal Sites 19 and 21 subject to London Underground Limited's need to safeguard operational activities associated with site 19 which includes staff car parking and train crew accommodation. In addition, to the north west of the site is a London Underground Limited substation to which access will need to be retained as part of any future development.	None	N/S	TfL Property's in principle support for the allocation of these two sites within the AAP is welcomed and noted. With regard to the need to safeguard operational activities associated with Site 19, and the need to retain access to the substation, the Council considers it appropriate that these requirement be added as a site constraint – <b>see proposed minor modification no AAP32</b>
20	114	Transport for London Property Development	Site 19: Harrow on the Hill car park west  &  Site 21: Harrow on the Hill car park east	Yes	TfL is currently producing Feasibility Studies for both sites which will inform the viability and deliverability of any future scheme brought forward. It should be noted that without the agreement from TfL Property to release the land for the proposed uses set out in sites 19 and 21, the designation as illustrated is undeliverable. However TfL Property is happy to work with the Borough and potential developers to realise the Boroughs vision for the sites set out in the Harrow and Wealdstone Area Action Plan.	None	N/S	The comments are noted, and the Council welcomes the opportunity to continue to work with TfL property to realise future redevelopment of these sites.
20	115	Transport for London Property Development	Site 19: Harrow on the Hill car park west  &  Site 21: Harrow on the Hill car park east	Yes	<b>Conclusion</b> TfL Property would welcome the opportunity to meet with the Borough to discuss the sites, current operational activity and their future development potential. Furthermore the delivery of any proposals for high quality developments can only be achieved through the support of planning policy. We suggest that the above points are considered to ensure the Pre Submission Harrow and Wealdstone Area Action Plan is 'sound' and policies are clear and robust.	None	N/S	The comments are noted, and the Council welcomes the opportunity to continue to work with TfL property to realise future redevelopment of these sites.

## Sub Area Harrow Town Centre East

No comments received

## AAP Opportunity Site 22: Lyon Road

No comments received

## AAP Opportunity Site 23: Gayton Road

No comments received

### Outputs and Housing Trajectory

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
9	051	Irene Wears on behalf of Campaign for a Better Harrow Environment	Chapter 5 – table of Outputs Across the Sub Areas	Yes	<b>Housing</b> - At page 172 there is an error in the total of homes for Harrow Town Centre East; it should be 637, which brings the total for the Intensification Area to 3408. This is almost 25% above the minimum of 2800 set out in the Core Strategy objectives. We understand that at this early stage, it is impossible to be precise as some sites may not be developed and other new sites may become available. However a “broad quantum” figure which exceeds the minimum by 25% is a matter for concern to us. Harrow which is one of the more densely populated outer London boroughs and one which was already exceeding its housing target pre-Core Strategy. The Core Strategy target of 2800 new homes in the Intensification Area should be made explicit. The purpose of the list of 3408 potential dwellings is surely to show that the Core Strategy target is achievable even if all sites are not developed to their maximum potential.	Amend error in the table and provide an explicit statement that the housing target for the Intensification Area is 2,800 as set out in the Core Strategy.	N/S	The Council agrees that the figure in the table should match that provided in the section on target outputs for this sub area at page 165 – <b>see proposed minor modification no. AAP33</b>  The NPPF, London Plan and Harrow Core Strategy all clearly state that housing targets are expressed as minimums. While sites are allocated on the basis that they are likely to become available for redevelopment over the plan period, past experience shows that this is not always the case. The implications of having a minimum housing target, and past allocated sites not being developed out, means that the Council must allocate sufficient sites to comfortably exceed the target requirement. In doing so, this allows the Council to better monitor and manage housing delivery, and conversely, to resist proposals for inappropriate development (i.e. development not in accordance with the Local Plan). <b>No change</b>

### Chapter 6: Delivery, Implementation and Monitoring

No comments received

### Chapter 7: Retail, Employment and Other Planning Designations

No comments received

### Appendix B: Glossary

ID	Rep No.	Respondent	Policy / Para / Figure	Sound	Reason / Comment	Change	Legal	Council's Comments / Response
3	009	Anne Swinson Hatch End Association	Glossary	N/S	Error	Previously Developed Land - last sentence should be “whole of the “curtilage” not “cartilage”.	N/S	Agreed, error needs correcting – <b>see proposed minor modification no. AAP36</b>
13	082	CgMs on behalf of MOPAC and the Metropolitan Police	Glossary	Yes	The MOPAC/MPS support the inclusion of a definition of community facilities (which includes policing facilities) within the glossary of the emerging AAP.	None	N/S	MOPAC/MPS support for the definition of ‘community facilities’ within the AAP Glossary is noted.