

---

**REPORT FOR: PLANNING COMMITTEE**

---

**Date of Meeting:** 24 January 2018

**Subject:** Applications to designate Harrow Hill  
Neighbourhood Area and Harrow Hill  
Neighbourhood Forum

**Responsible Officer:** Paul Nichols, Divisional Director -  
Regeneration and Planning

**Exempt:** No

**Wards affected:** Harrow on the Hill and Greenhill

**Enclosures:** Appendix 1: Application for Harrow Hill  
Neighbourhood Area designation  
Appendix 2: Application for designation of  
Neighbourhood Forum (Harrow Hill  
Neighbourhood Forum) (including  
subsequent amendment to Constitution and  
update to membership list)  
Appendix 3: Representations received  
Appendix 4: Applicant's response to  
representations  
Appendix 5: Equality Impact Assessment

## **Section 1 – Summary and Recommendations**

This report responds to applications from the proposed Harrow Hill Neighbourhood Forum to designate a Neighbourhood Area and to be designated as the Neighbourhood Forum covering that Area. These applications were received on 21 September 2017.

The applications are made pursuant to the *Neighbourhood Planning (General) Regulations 2012 (as amended)* (referred to in this report as “the Neighbourhood Planning Regulations”). The applications are being reported to the Planning Committee as under the Regulations, applications to designate Neighbourhood Areas and Neighbourhood Forums are made to the Local Planning Authority (i.e. the Planning Committee).

Under the Regulations, the Council must decide the applications within 13 weeks after the application is first publicised, which includes a six week consultation period (which ran from 1 November 2017 to 13 December 2017).

As a result of the outcomes of the consultation process and officers’ assessment of the applications and supporting material against the requirements of the Regulations, it is considered that the boundary of the proposed neighbourhood area should be reduced to better reflect the character of the area and the membership of the proposed neighbourhood forum. The revised area excludes those areas that exclusively and distinctly large scale educational institution in character (Harrow School and John Lyon School) and hospital (Clementine Churchill Hospital) and which are not represented on the proposed neighbourhood forum.

Subject to a reduced neighbourhood area being agreed, it is recommended that the Committee agree to designate the proposed neighbourhood forum on the basis that its membership is more geographically representative of the reduced area and meets the other requirements for designating a forum (subject to some minor amendments to the draft Constitution). Membership of the Forum will be monitored on an on-going basis as there are a number of areas in the reduced Neighbourhood Area that do not currently have any representation on the Forum.

Alternatively, should the Committee decide to designate the entire neighbourhood area as applied for, the application to designate a neighbourhood forum must be refused as its membership will not be representative of in excess of 40% of the proposed area and therefore fail the statutory requirements for being designated as a neighbourhood forum.

### **Recommendations:**

The Planning Committee is requested to:

- a) Note the applications from Harrow Hill Neighbourhood Forum to designate a Neighbourhood Area (Appendix 1) and to be designated as

the Neighbourhood Forum covering that Area (Appendix 2).

- b) Note the representations received in response to the consultation period, which are summarised in section 6 and included in full as Appendix 3.
- c) Note the applicants' responses to the representations received (refer Appendix 4).
- d) Note officers' assessment of the two applications in Sections 7 (Neighbourhood Area) and 8 (Neighbourhood Forum) below.
- e) Refuse the neighbourhood area applied for (edged 'red' on Figure 5 of this report) but designate the revised area edged 'blue' on Figure 5 as the Harrow Hill Neighbourhood Area.
- f) Should the revised neighbourhood area [recommendation (e)] be agreed, designate the proposed Harrow Hill Neighbourhood Forum subject to the draft constitution being amended to refer to the revised area rather than the Area of Special Character and to include references to Greenhill Ward where appropriate.
- g) Alternatively, should the neighbourhood area as applied for be agreed [i.e. recommendation (e) amended], refuse the application to designate the proposed Harrow Hill Neighbourhood Forum.
- h) Delegate to the Divisional Director – Regeneration and Planning authority to undertake the necessary statutory processes required as a result of the decisions on the applications to designate a neighbourhood area and neighbourhood forum above.

**Reason: (For recommendations)**

Local Planning Authorities have a number of obligations with respect to neighbourhood planning; these include making decisions on requests to designate Neighbourhood Areas and Neighbourhood Forum. Some of these responsibilities have to be undertaken within the timeframes outlined in the Neighbourhood Planning Regulations. The report and recommendations seek to fulfil these obligations with respect to the proposed Harrow Hill Neighbourhood Area and Forum.

## **Section 2 – Report**

### **1. Introduction**

- 1.1 The report incorporates the corporate priority concerning:
  - a) Making a difference for communities
- 1.2 Neighbourhood Plans were introduced through the Localism Act 2011 and amended the Town and Country Planning Act 1990 accordingly. The Act enables communities to develop planning policies that will become part of the planning framework for their area. It also allows them to grant planning permission for certain types of new development.
- 1.3 Neighbourhood planning is delivered by 'neighbourhood forums' for their 'neighbourhood area'. Neighbourhood forums and areas need to be agreed by local planning authorities, following local publicity.
- 1.4 Facilitating neighbourhood planning within the borough enables communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area, thereby making a difference for communities.

### **2. Options considered**

- 2.1 The Council is obliged under the Neighbourhood Planning Regulations to decide any applications to designate a Neighbourhood Area and / or Neighbourhood Forum. In doing so, the Council must have regard to the Regulations and base its decision on the requirements set out therein. The Council can either approve or reject the request for designation of the Forum. For requests to designate a Neighbourhood Area, it can also amend the proposed boundary. Sections 7 and 8 provide an assessment of the applications received from the proposed Harrow Hill Neighbourhood Forum.
- 2.2 Due to the statutory timeframes for deciding applications (13 weeks), the required six week consultation period and the lead-in times for Committee reports, it was originally intended to seek delegated authority at the November Planning Committee to make the final decision, post consultation. However, due to a number of significant issues that arose during the consultation process, this approach was amended to defer Planning Committee's consideration of the matter until post consultation so that the Committee could consider the full consultation responses and determine the applications' itself. As decisions on the applications are due by 30 January 2018, a decision however must be made at this meeting, leaving little margin for slippage in timeframes.

- 2.3 Should one or both of the applications be refused, this does not prevent subsequent applications that address the reasons for refusal being submitted in the future. These options / scenarios are addressed in more detail in sections 7 and 8.

### **3. Background**

- 3.1 The National Planning Practice Guidance (NPPG) indicates that 'neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area'.
- 3.2 In undertaking neighbourhood planning, local communities can choose to:
- (a) set planning policies through a neighbourhood plan that is used in determining planning applications.
  - (b) grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order.
- 3.3 As introduced by the Localism Act 2011 the Town and Country Planning Act 1990 now provides a statutory regime for Neighbourhood Planning. It is not a legal requirement for this to be implemented in each neighbourhood, but a right which communities in England can choose to use. Communities may decide that they could achieve the outcomes they want to see through other planning routes, such as incorporating their proposals for the neighbourhood into the Local Plan, or through other planning mechanisms such as Local Development Orders and supplementary planning documents or through pre-application consultation on development proposals.
- 3.4 A neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 16 of the National Planning Policy Framework).
- 3.5 A neighbourhood plan can be used to address the development and use of land. This is because if successful at examination and referendum the neighbourhood plan comes into force as part of the statutory development plan. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise (see section 38(6) of the Planning and Compulsory Purchase Act 2004).

- 3.6 Neighbourhood planning can motivate local people and businesses to consider other ways to improve their neighbourhood than through the development and use of land. They may identify specific action or policies to deliver these improvements. Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable. For example, set out in a companion document or annex.
- 3.7 Where a community wants to take up the opportunities offered by neighbourhood planning, the legislation enables 3 types of organisation, known as 'qualifying bodies', to lead it:
- (a) a parish or town council
  - (b) a neighbourhood forum
  - (c) a community organisation
- 3.8 A local planning authority must:
- (a) take decisions at key stages in the neighbourhood planning process within the time limits that apply.
  - (b) provide advice or assistance to a parish council, neighbourhood forum or community organisation that is producing a neighbourhood plan or Order as required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).
- 3.9 The process of preparing a neighbourhood plan can be summarised as follows:

*Stage 1 – Getting established*

The first step for parish/town councils or prospective neighbourhood forums wishing to prepare a neighbourhood plan is to submit their proposed neighbourhood area to the local planning authority for designation. Prospective neighbourhood forums will also need to be designated by the local planning authority.

*Stage 2 – Preparing the plan*

Preparing to write a neighbourhood plan includes publicity, development of local partnerships, community consultation and engagement and the building of an evidence base. This will inform the development of a vision and/or aims for the plan. These in turn will inform the formulation of policy and, where appropriate, site allocations. Community engagement and consultation will be necessary at all stages of the plan-making process.

*Stage 3 – Bringing the plan into force*

The proposed neighbourhood plan will be submitted to the local planning authority, which will check that proper procedures have been

followed in its preparation and that any necessary assessments accompany the plan. Following a period of publicity, the local planning authority will arrange for an independent examination. It will also organise the public referendum, subject to the plan meeting legal requirements.

(Source: <http://locality.org.uk/wp-content/uploads/Neighbourhood-planning-roadmap-2016.pdf>)

- 3.10 To help deliver their vision, communities that take a proactive approach by drawing up a neighbourhood plan or Order and secure the consent of local people in a referendum, will benefit from 25% of the revenues from the Community Infrastructure Levy (CIL) arising from the development that takes place in their area (the 25% is an increase from the standard 15% of CIL receipts that local communities without a neighbourhood plan are able to more greatly influence the spending of).
- 3.11 This matter is being reported to the Planning Committee as under the Regulations, applications to designate Neighbourhood Areas and Neighbourhood Forums are made to the Local Planning Authority (i.e. the Planning Committee). Should the Neighbourhood Forum prepare a Neighbourhood Plan, this will be reported to the Cabinet as it will form part of the Council's Policy Framework (which is not within the Planning Committee's Terms of Reference).

#### **4. Statutory requirements for Neighbourhood Areas and Neighbourhood Forums**

##### *Neighbourhood Areas*

- 4.1 As noted above, a neighbourhood area is proposed by a prospective neighbourhood forum and designated by the LPA. Section 61(g) of the Town and Country Planning Act 1990 provides that a neighbourhood area can only be designated where a 'relevant body' has applied to the authority for an area specified in the application to be designated as a neighbourhood area. A relevant body has been defined as a parish council, or an organisation or body which is, or is capable of being, designated as a neighbourhood forum. The Court of Appeal has observed that where a neighbourhood forum application has been rejected an application by that forum to designate a neighbourhood area can be rejected. The National Planning Practice Guidance at 035 ID:41-035-20161116 confirms that provided the application is not by a parish Council, a LPA can refuse to designate an area applied for.
- 4.2 The neighbourhood area is the boundary for the area over which the neighbourhood forum is 'authorised to act' (as described in Daws Hill Neighbourhood Forum v Wycombe District Council 2014) . It will also form the boundary of the area in relation to which a neighbourhood development plan can be brought forward. Neighbourhood areas can cover areas across local planning authority boundaries and can be

any shape or size. Only one neighbourhood area can cover any given location.

4.3 As the LPA, Harrow Council has a statutory duty to determine applications to establish neighbourhood areas. In determining the application for designation, the Act requires the Council to:

- (a) consider whether the area is an appropriate area to be designated as a neighbourhood area; and
- (b) designate all or part of the proposed area as a neighbourhood area provided at least some of the proposed area has not already been designated as a neighbourhood area.

4.4 The above gives the Council considerable discretion in determining an application for designating a Neighbourhood Area.

#### *Neighbourhood Forums*

4.5 As noted above, neighbourhood forums are community-led groups which seek to help shape growth and development within their relevant neighbourhood areas. Groups must apply to their LPA to be designated as a neighbourhood forum. Once designated, a neighbourhood forum can develop a neighbourhood plan for its neighbourhood area. As the LPA for its area, Harrow Council has a statutory duty to determine applications to designate neighbourhood forums.

4.6 The Act sets out four criteria that a prospective neighbourhood forum needs to meet if it is to be designated:

- (a) It is established for the express purpose of promoting or improving the social, economic and environmental wellbeing of an area that consists of or includes the neighbourhood area concerned;
- (b) Its membership is open to individuals who live in the neighbourhood area, individuals who work there (whether for businesses carried on there or otherwise) and individuals who are elected members (for London in respect of a London borough council) any of whose area falls within the neighbourhood area concerned;
- (c) Its membership includes a minimum of 21 individuals each of whom live in the area, work in the area or are elected members for the area; and
- (d) It has a written constitution.

4.7 The Act also requires the Council, in considering whether to designate a neighbourhood forum, to consider whether the:

- (a) Forum has secured, or taken reasonable steps to secure, membership that includes at least one individual from the three categories i.e. people who live, work or are elected members for the area;



- (b) Membership is drawn from different places in the area and different sections of the community in the area; and
- (c) The purpose of the forum reflects (in general terms) the character of the area.

4.8 The above requirements give the Council limited discretion in determining applications for the designation of a Neighbourhood Forum; the proposed Forum either meets the requirements or it doesn't.

4.9 Once designated, a forum ceases to have effect after 5 years. Harrow is also able to withdraw a designation where they consider that the Forum is no longer meeting the conditions by reference to which it was designated (i.e. if its Membership was no longer drawn from different places in the area).

## **5. Overview of the Applications to designate a Neighbourhood Area (Harrow Hill Neighbourhood Area) and Neighbourhood Forum (Harrow Hill Neighbourhood Forum)**

### *Harrow Hill Neighbourhood Area*

5.1 An application has been received from the proposed Harrow Hill Neighbourhood Forum to designate a Neighbourhood Area; the application is attached at Appendix 1. Figure 1 below shows the area applied for on a map, with Figure 2 showing the area on an aerial photo. The application was received on 21 September 2017.

5.2 The proposed Neighbourhood Area is based on the 'Harrow on the Hill Area of Special Character' identified in the Harrow Local Plan. Harrow Hill Area of Special Character is a topographical feature with an identifiable profile to the south of the Borough, forming the verdant 'shoulders' upon which sits St. Mary's Church and supplemented by a substantial body of open space around the Hill's lower slopes. Part of its character is the prominence that the Hill provides to the historic hilltop settlement, particularly St Mary's Church and the historic Harrow School buildings, and the setting created by the major open areas, including the cumulative contribution of groups and individual trees. The boundaries of the Harrow on the Hill area of special character take in playing fields and other spaces which form Metropolitan Open Land around the hilltop settlement.

5.3 The Hill also contains the Borough's highest concentration of listed and locally listed buildings, and much of its built environment also benefits from conservation area designation. Part of the Roxborough Park and The Grove Conservation Area is located outside the Area of Special Character so the proposed Neighbourhood Area includes that additional area, but not Lowlands Recreation Ground as that is also included in the Harrow and Wealdstone Opportunity Area and Harrow Metropolitan Centre.

- 5.4 The area applied for has a total area of 240 hectares. The Local Land and Property Gazetteer (LLPG) indicates 2,506 residential addresses and 229 non-residential addresses. Based on an average household size of 2.67 persons for Harrow on the Hill Ward, the 2,506 residential addresses in the area applied for translates into an indicative population of 6,685 people.

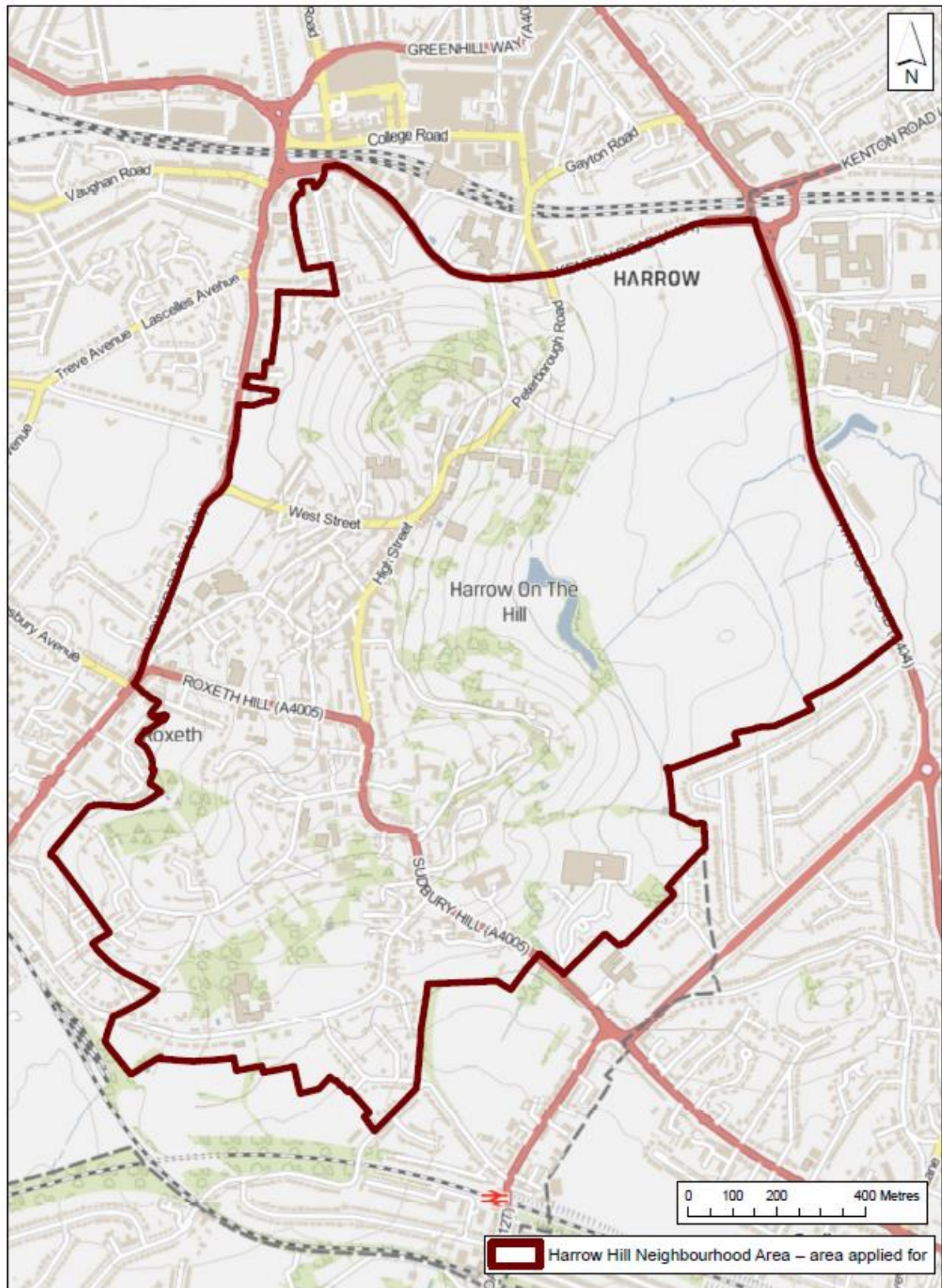
#### *Harrow Hill Neighbourhood Forum*

- 5.5 An application has also been received from the proposed Harrow Hill Neighbourhood Forum to be designated a Neighbourhood Forum under the Neighbourhood Planning Regulations; the application is attached at Appendix 2. The application was received on 21 September 2017. It is possible for applications for Neighbourhood Areas and Neighbourhood Forums to be considered concurrently, but there is the risk that any changes to the Area boundary made by the Local Planning Authority in deciding that application may mean the Forum is not considered representative of the revised Area (or vice-versa).

#### *Context of applications*

- 5.6 Council officers were indirectly aware that a potential neighbourhood area and forum were being considered for Harrow Hill. The first direct approach to officers by the proposed Forum was on Monday 4 September 2017, when the 'Chairman designate' of the proposed Forum contacted officers wishing to submit the completed applications. Officers advised the Chairman designate that the National Planning Practice Guidance relating to Neighbourhood Planning states that the community should consult the local planning authority before making an area application. The Chairman designate responded to officers indicating that the potential neighbourhood area and forum had been raised in a '15 minutes with the Leader' slot on 8 March 2016 but agreed to meet with officers on Wednesday 13 September 2017 (some 18 months after the 15 minute slot with the Leader).
- 5.7 At the meeting between Forum members and officers the concept of neighbourhood planning and the applications were discussed in general terms and informal verbal advice provided by officers based on the information provided by the applicant (i.e. including the clear indication that both Harrow School and John Lyon School were formal members of the proposed Forum). The applications (with minor amendments) were submitted to the Council on 21 September 2017.
- 5.8 The level of engagement with the LPA by the applicant prior to submission of the applications is considered modest compared to that perused by other proposed neighbourhood forums in other boroughs (noting that this is the first such applications in Harrow).

Figure 1: Harrow Hill Neighbourhood Area – as applied for



© Crown copyright and database rights 2018 Ordnance Survey 100018206  
© 2018 Europa Technologies Ltd. All rights reserved.



Figure 2: Harrow Hill Neighbourhood Area – as applied for (aerial photograph)



Legend

 Area applied for by Harrow Hill Neighbourhood Forum

## 6. Consultation arrangements and summary of responses

### *Consultation arrangements*

- 6.1 Regulations 6 and 9 of the Neighbourhood Planning (General) Regulations 2012 outline the publicity requirements for application/s to designate and Neighbourhood Area and Neighbourhood Forum respectively. As a minimum, the Council is required to publicise the application/s, details of how to make representations and the date any representations must be received by (being not less than six weeks from the date the application/s are first publicised). It must publicise the application/s on its website and in such other manner as it considers is likely to bring the application/s to the attention of people who live, work or carry on business in the area to which the area application relates.
- 6.2 The following consultation activities were undertaken in relation to the applications:
- (a) The applications were placed on the Council's website on 1 November 2017.
  - (b) A public notice of the applications was delivered to every residential property and business in the proposed Neighbourhood Area; this occurred on 1 November 2017.
  - (c) Notifications were sent to email contacts on the Council's Local Plan consultation database. Emails were also sent to those people who had previously responded to the consultation on the draft Harrow School Supplementary Planning Document (SPD) in 2015, as these people had expressed in interest in planning within the area. These emails were sent on 30 October 2017.
  - (d) The application documents were made available for inspection (by appointment) at the Harrow Civic Centre.
- 6.3 The above actions exceed the requirements of the Regulations. Letters to stakeholders on the Council's LDF Consultation Database (where no email address was available) were not posted as the most pertinent stakeholders (i.e. those living or working in the proposed Neighbourhood Area) would have received the public notice as part of the letter-drop process.

### *Summary of consultation responses*

- 6.4 A total of 122 consultation responses were received during the consultation period; a complete schedule of responses can be found as Appendix 3 to this report.
- 6.5 Respondents can be categorised as follows:
- (a) Residents / individuals: 107
  - (b) Community groups: 6
  - (c) Businesses / schools (including employees of schools): 4
  - (d) Government / statutory consultees: 5

- 6.6 The nature of the responses can be grouped as follows:
- (a) 100 responses were supportive of the forum and / or area, or the 'neighbourhood plan' in a general sense;
  - (b) 5 responses were supportive of the forum and area, but sought an extension of the area;
  - (c) 5 responses did not state a clear position either in support or opposition to the proposed area and / or forum (these were statutory consultees providing advice / observations);
  - (d) 3 responses objected to their names being included on the list of Forum members and the process upon which the applications had been made;
  - (e) 8 responses (6 individuals and 2 community groups) objected to the neighbourhood forum; and
  - (f) 1 response requested revisions or removal from the proposed area, as well as objecting to the validity of the two applications overall.

6.7 Each of these categories of responses are addressed below

*Supportive of the forum and / or area, or the 'neighbourhood plan' in a general sense*

6.8 100 responses were supportive of the applications. Many of the responses made general reference to supporting the concept of neighbourhood planning rather than making specific reference to the appropriateness of the proposed Neighbourhood Area or Forum (i.e. the applications being consulted on and determined).

*Supportive of the forum and area, but sought an extension of the area*

6.9 Five representations supported the applications, but requested extensions of the proposed Neighbourhood Area:

- (a) Four representations requested the inclusion of whole of Roxborough Avenue and / or all of Roxborough Park. Reasons given included that the Neighbourhood Area should cover all of the area included in the Roxborough Residents Association.
- (b) One representation requested a slight extension to boundary further south of private road of South Hill Avenue/Mount Park to end at start of Brooke Avenue), indicating 'the houses in this area in keeping with the area within the conservation area and the corner of Brooke Avenue seems to be a more natural end point'.

6.10 The appropriateness of the proposed Neighbourhood Area boundary is addressed in detail in section 8 below.

*Statutory consultees providing advice / observations*

6.11 Five representations were received from statutory consultees / infrastructure providers. These representations are summarised below:

- (a) *National Grid*: advised there are no National Grid electricity and gas transmission apparatus (which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus) within the Neighbourhood Plan area.
- (b) *Natural England*: provides general advice in relation to when Natural England should be contacted in relation to the neighbourhood plan, the requirement to be consistent with the National Planning Policy Framework (citing the paragraphs relevant to the natural environment) and Local Plan, and providing details of potential information sources.
- (c) *Highways England*: notes that the applications just relate to the Area and Forum and that these will not have any impact upon the Strategic Road Network (SRN). Highways England would need to be consulted on any proposals that have the potential to impact on the safe and efficient operation of the SRN - in this case the M1, M25 or M40.
- (d) *Historic England*: Notes that the area covered by the proposed Neighbourhood Plan includes eight conservation areas and numerous listed buildings. Recognises the proposed boundary almost fully encompasses the eight designated conservation areas with the exception of a small area of the Roxborough Park and the Grove Conservation Area to the north of Lowlands Road. Advises that boundaries reflect or encompass the conservation area boundary, ensuring that the conservation area policies are operated in a consistent manner. Indicates however that this is not a matter they wish to comment on further; however advises to discuss with the Council if the significance of the conservation area could be affected. Provides general advice in relation to neighbourhood planning and the historic environment.
- (e) *Transport for London*: TfL notes that the northern border stops short of including Harrow-on-the-Hill Station and similarly with the two adjacent Sudbury Hill stations to the south. TfL expresses surprise as some area residents will use routes passing through the Neighbourhood area, to reach public transport nodes beyond (as well as the bus routes along some of its boundaries). They however also notes that the Forum wishes to address only challenges to the character of the existing Harrow Hill 'Area of Special Character' from development; transport infrastructure (with the possible exception of on-street parking) is not featured in the aims.

- 6.12 It should be noted that whilst comments were sought from statutory consultees, this is not required by the Regulations at this stage of the process. The requirement in relation to area and forum applications is to publish these on the Council's website and 'in such other manner as it considers is likely to bring the application/s to the attention of people who *live, work or carry on business* in the area'.

*Representations in relation to the process of submitting the applications*

- 6.13 Three of the responses objected to their names being included as forum members, stating that they were unaware that the applications were going to be made and objected to their names being included as members of the proposed Forum. These responses are from employees of Harrow School and John Lyon School (who are cited in the application material as representing their respective employers), as well as an individual.

- 6.14 In relation to the two individuals cited as representing Harrow School and John Lyon School, their representations can be summarised as follows:

- (a) They were unaware that the application had been made nor that material previously circulated by email (by the applicant) would form the basis of the application. Had they been aware, they would have taken advice / sought agreement from the organisation which they were nominated in the application as representing.
- (b) They had not agreed to their names being included on the list of Forum members that accompanied the application and that their inclusion on the list implied that they supported the application in its current form, which was not the case.
- (c) The potential for an application had only been discussed at a single meeting and subsequent correspondence had not been clear with respect to the intention to make an application.
- (d) Unaware of any other discussions that may have been held or any formal agreement in relation to the application, potential chairman / officers, or named members.

- 6.15 The individual that responded specifically in relation to their membership of the proposed Forum also makes similar comments, namely that the applications were submitted without having convened a meeting or members of the proposed forum being notified of the applicant's intention to do so.

- 6.16 On the basis of these three representations, it cannot be taken that the two individuals representing Harrow School and John Lyon School and the independent individual ever consented to their names being included in the list of proposed members. It is not a matter of them subsequently changing their minds once the application was made, nor is it appropriate for the applicant to have assumed consent had been given.



*Representations objecting to the neighbourhood forum*

6.17 Seven responses (5 individuals and 2 community groups) objected to the neighbourhood forum, on the following grounds:

- (a) *Harrow on the Hill Forum*: in its representation the Forum indicates that it supports the concept of a Neighbourhood Forum being established (broadly covering the Area of Special Character). It however identifies a number of concerns:
  - (i) Limited extent of consultation on or notification of the application.
  - (ii) List of proposed Neighbourhood Forum members indicates a number of members represent other groups but this is not the case and / or was not formally agreed (i.e. the Chair of the Harrow on the Hill Forum had volunteered in a personal capacity but is listed in the application as representing the Harrow on the Hill Forum).
  - (iii) In the absence of any known consultation or meeting, the 'Chairman Designate' is presumably self-appointed.
  - (iv) Concern that the applications are not supported by Harrow School. Notes that given that the primary aim of the Neighbourhood Forum is to develop a 'local plan' for the Neighbourhood Area, and that a substantial part of the proposed Area is in the School's Estate, it is difficult to see how such an agreed plan could emerge without the School's co-operation.
  - (v) Concludes that whilst supporting the concept of a new Neighbourhood Area/Forum/Plan for the Hill, the present application appears to be premature. The successful emergence of a Neighbourhood Plan requires wider active representation, more meaningful consultation and more local 'buy-in' to develop the level of consensus required.
- (b) *Hatch End Association*: Supports the principle of a Harrow on the Hill Neighbourhood Forum but have a number of concerns regarding governance (including the size of the Executive Committee - minority taking control of local policy), little information on financing / costs of the proposed Forum, long-term sustainability of the group and future disengagement potentially leading to minority interests being represented.
- (c) *Individuals*: A number of points were raised:
  - (i) Process sounds divisive, creates a sense of Harrow Hill being separate from the rest of Harrow and an attempt to be exclusive.
  - (ii) Do not believe that this self-appointed group represents

the views or interests of the local community. Further there is a huge democratic deficit in that there is no way that this self-elected group can stand for election or re-election. There may be flaws in the present arrangements but at least there is democratic accountability through the election of Councillors.

- (iii) Do not agree with the purpose of the forum which believe to have been proposed by people with their own agenda. There are already means for consultation on planning matters.
- (iv) Concern that some of the members listed in the application do not want to be part of the Forum.
- (v) Wants to know what qualifies the members of the proposed Forum to speak on their behalf.
- (vi) Concern that the Constitution of the Forum states that the Forum Committee will not be disclosed to the general public and lack of transparency.
- (vii) Concern that the Forum dissolved in five years, with all powers and assets passing to one or more affiliated members, the identity of which, as noted above, will not be known to the general public.
- (viii) No concrete provision for the opportunity to comment by email on any of the proposals that are discussed in future years, as there is presently.

*Representations against the applications and seeking amendments to the proposed Neighbourhood Area to remove areas*

6.18 A summary of the response from Harrow School against the applications is outlined below:

- (a) Neighbourhood Plans and Neighbourhood Development Orders can have a significant impact upon the economic, social and environmental character of an area and those who live or work in the area. Parliament requires strict conditions be met before those persons who would control the Neighbourhood Forum are given powers to formulate a Neighbourhood Area, Neighbourhood Plan and Neighbourhood Development Areas and that control over such matters is vested in the Local Planning Authority who must as a matter of law scrutinise carefully and fully and applications to designate a Neighbourhood Area and Neighbourhood Forum.
- (b) The Town and Country Planning Act 1990 sets requirements that must be met in relation to designating a Neighbourhood Forum and Neighbourhood Area (see previous sections). In relation to Forums, the LPA must be satisfied the stated

conditions are met. In terms of Neighbourhood Areas, the LPA must consider whether the area is appropriate and this includes taking into account the effect on the proper planning of the area having regard to the Development Plan and any relevant adopted Supplementary Planning Documents. Case law indicates the LPA has broad discretion when considering an application to designate a Neighbourhood Area, provided it has regard to the factual and policy matrix applying at the time the decision is made.

- (c) The Statement accompanying the neighbourhood area application is inadequate for the following reasons:
- i. Approximately 40% of the proposed area is exclusively owned by Harrow School and the School is a strong objector the application.
  - ii. The recently adopted (July 2015) Harrow School SPD provides guidance for development within its area / the School and as a SPD, should be given significant weight. The SPD was subject to significant consultation. The proposed Neighbourhood Area would overlap the SPD area and in the interests of proper planning and avoiding conflict between the SPD and any Neighbourhood Plan, the proposed Neighbourhood Area should be amended to exclude the Harrow School SPD area from the Neighbourhood Area.
  - iii. The Act requires that the LPA must have regard to the desirability of designating a body whose membership is drawn from different places in the Neighbourhood Area concerned and from different sections of the community in that area. Post code analysis of the members listed do not reflect a proper geographical spread. The eastern part of the area is largely in the ownership of the School who is unwilling to join the Forum.
  - iv. The application material for the proposed Forum fails to demonstrate an understanding of the demographic profile of the proposed area and how the membership is reflective of this.
  - v. Engagement carried out by the applicant prior to the applications being lodged is inadequate, including seeking agreement to lodge the application. No evidence of consultation with residents / businesses beyond the proposed boundaries.
  - vi. From an area of approximately 4,600 households, there are fewer than 25 members of the proposed Forum. No evidence that the residents, businesses, organisations and employees in the proposed Area have been properly consulted.
- (d) In relation to the application to designate a Neighbourhood Forum, the School makes the following comments:
- i. Proposed Forum is not representative of the residents and businesses within the area.
  - ii. The Forum has not been properly constituted.

- iii. Inadequate consultation has been undertaken and residents, businesses and organisations located in the area must be properly consulted before the application can have any validity.
- iv. The applicant has not been properly appointed as Chairman and no authority to act on behalf of the Neighbourhood Forum in making such an application.
- v. No evidence that all the persons stated to be members of the Neighbourhood Forum have agreed to be named members / included in the application. At least three of named persons actually object to the application. On this basis, the Forum fails to meet the requirement under the Act for a minimum 21 named members and therefore the Council does not have the power to approve the application.
- vi. The constitution of the proposed Neighbourhood Forum is unacceptable.
- vii. Forum membership would be unrepresentative – with businesses given the same voting rights regardless of size and number of employees.
- viii. Draft constitution would undermine the Harrow School SPD and decisions which are made by the elected members of the LPA.
- ix. There is no evidence to support assertion that ‘its current members, through involvement with other local community groups, will have ‘significant reach to a very large number of residents’. In an area of 4,600 households, there are fewer than 25 members.

6.18 Redacted versions of the representations against the proposed area and / or forum were provided to the applicant and Appendix 4 includes the applicant’s response to these. Sections 7 and 8 below address the representations as part of the assessment of the applications for proposed area and forum respectively.

## **7. Officer Assessment – Neighbourhood Area**

7.1 As noted above, the Council has discretion in determining the boundary of a neighbourhood area pursuant to section 61G of the Act. Such discretion has been tested and confirmed by the Court of Appeal (see Daws Hill Neighbourhood Forum v Wycombe District Council 2014).

7.2 The judgments of the High Court and Court of Appeal in the Daws Hill litigation state that in determining an application under section 61G the LPA should have regard to a specific ‘factual and policy matrix’ that applies to that area. On this basis and in the context of national legislation and guidance, Table 1 below sets out the specific factual and policy matrix, and its component elements, that officers have considered in assessing the application and developing their recommendations and the rationale for including these elements.

**Table 1: Factual and policy matrix elements and rationale for selection**

	<b>Factual and policy matrix element</b>	<b>Rationale for selection</b>
1	National Planning Practice Guidance (PPG) paragraph 033 Reference ID: 41-033-20140306	Part of the National Planning Practice Guidance. Provides specific guidance on What could be considerations when deciding the boundaries of a neighbourhood area
2	The strategic significance of sites	The Court of Appeal (Daws Hill Neighbourhood Forum v Wycombe District Council) has confirmed that local planning authorities have the discretion to consider the strategic significance of sites as part of the factual and policy matrix in deciding whether or not such sites should be included in a proposed neighbourhood area
3	Consultation responses	Consultation responses are a material consideration in determining the appropriateness of a neighbourhood area.
4	The character of the proposed Neighbourhood Area	<p>Character is considered to be a key element of the factual and policy matrix due to its inclusion in the following elements of guidance:</p> <ul style="list-style-type: none"> <li>a) NPPF paragraphs 126 and 131 recognise the importance of new development making a positive contribution to local character.</li> <li>b) National Planning Practice Guidance paragraph 033 Reference ID: 41-033-20140306 sets out nine considerations for deciding the boundary of a neighbourhood area. Four of these relate to the physical character of an area. These are: <ul style="list-style-type: none"> <li>i. the physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or style</li> <li>ii. whether the area forms all or part of a coherent estate either for businesses or residents</li> <li>iii. whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway</li> <li>iv. the natural setting or features in an area</li> </ul> </li> </ul>

	Factual and policy matrix element	Rationale for selection
		c) The Mayor of London's Character and Context Supplementary Planning Guidance identifies that character is a component in defining areas for neighbourhood plans.

7.3 It should be noted that the statement that accompanies the application to designate the proposed area does not specifically address any of the considerations outlined above but does meet the requirements under the Act to include a statement explaining why this area is considered appropriate to be designated as a Neighbourhood Plan. The statement simply seeks to adopt the Area of Special Character boundary with some minor modifications and explain why setting a neighbourhood area and progressing a neighbourhood plan is considered important.

*Assessment against Factual and Policy Matrix Element 1: National Planning Practice Guidance (NPPG)*

7.4 The National Planning Practice Guidance (paragraph 033 Reference ID: 41-033-20140306) sets out nine considerations for deciding the boundary of a neighbourhood area. The proposed neighbourhood area has been assessed against these considerations. This assessment is set out in Table 2 below:

**Table 2: Assessment of the proposed Neighbourhood Area against considerations set out in the NPPG**

	PPG consideration	Assessment
1	Village or settlement boundaries, which could reflect areas of planned expansion	<p>Such a consideration is not directly relevant to a built-up urban area. However, the proposed area includes a number of discrete or historic neighbourhoods / villages, including that covered by the Harrow on the Hill Village Conservation Area, Roxborough Park and the Grove, Roxeth Hill, Sudbury Hill and South Hill Avenue. There is however limited opportunity for expansion of existing settlements, with large portion of the proposed area designated as Metropolitan Open Land (see Figure 3 below).</p> <p><b>Summary: There is little scope for expansion of the existing urban area and therefore no justification (against this particular consideration) for any proposed neighbourhood area to</b></p>

	<b>PPG consideration</b>	<b>Assessment</b>
		<b>include non-built up areas beyond the existing urban area.</b>
2	The catchment area for walking to local services such as shops, primary schools, doctors' surgery, parks or other facilities	<p>The proposed area contains a number of each of these, but these are located predominantly in the western half of the proposed area. The only local 'amenities' in the eastern part of the area (i.e. that occupied by Harrow School) are a number of rights of way through the Harrow School playing fields, some Harrow School facilities covered by community use agreements, the Harrow School Golf Course and the Harrow Hill Golf Course (Pitch-and-Putt). Many of these facilities that are open to the public / other schools are significant in scale and serve a catchment wider than the immediate neighbourhood.</p> <p><b>Summary: there is a distinct difference with respect to the proposed area and the catchment / availability of local services, with the majority of local services being in the built-up area in the western-half of the proposed area. Facilities open to the public in the eastern part of the site, whilst serving a local function, also have a much broader catchment (recognised in the Local Plan site allocation for Harrow School and the 'Capital Ring' in the London Plan, for example).</b></p>
3	The area where formal or informal networks of community based groups operate	<p>There are a number of community based groups and residents associations within the area. The application material provides little detail as to the geographic extent of these, but by their nature (resident / community groups) the extent of their membership will be focused on the established residential areas.</p> <p><b>Summary: membership of formal or informal networks of community based groups in the area will be focused on residential areas but will have an interest in the wider area.</b></p>
4	The physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or	There are clear physical differences within the proposed neighbourhood area, namely a significant element of it (114 hectares or 47.5% %) is Metropolitan Open Land, including 100 hectares in a

	<b>PPG consideration</b>	<b>Assessment</b>
	style	<p>single continuous parcel in the eastern part of the area applied for (representing 41.7% of the total area applied for and 87.8% of all MOL with that area) (see Figure 3 below). This in contrast with built up residential, commercial and community / school areas. Within the built-up area, the scale and nature of development contains distinct differences – namely residential / commercial buildings, and institutional buildings (associated with education and health facilities).</p> <p><b>Summary: the proposed area contains a number of distinct characteristics – large continuous tracts of open space, residential / business, and large scale institutional establishments.</b></p>
5	Whether the area forms all or part of a coherent estate either for businesses or residents	<p>The proposed area comprises the Harrow School / John Lyon School ‘estate’ (i.e. buildings / grounds specifically used for educational purposes), several other schools (of modest area and surrounded by residential development i.e. Roxeth Primary School), residential areas (mostly in discernable estates and covered by their respective Conservation Areas) and small areas of commercial / business uses. The most discernable estate is Harrow School, particularly that area to the east of the High Street.</p> <p><b>Summary: the proposed area contains residential estates (with commercial / institutional facilities within these) and the Harrow School Estate / John Lyon School on the eastern and western boundaries of the proposed neighbourhood area.</b></p>
6	Whether the area is wholly or predominantly a business area	<p>The area contains a mixture of residential and non-residential uses. The most notable non-residential uses (by area) are Harrow School and John Lyon School, which combined represent in excess of 40% of the proposed neighbourhood area.</p> <p><b>Summary: by area, the proposed area is split almost evenly between residential and non-residential, demonstrating a clear difference between two elements of the area.</b></p>



	<b>PPG consideration</b>	<b>Assessment</b>
7	Whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway	<p>Harrow Hill and surrounding open land is a natural boundary potentially capable of defining the boundary of any proposed Neighbourhood Area. This is in part reflected in the boundary of the Harrow Hill Area of Special Character.</p> <p><b>Summary: Harrow Hill is a physical feature that defines a natural boundary.</b></p>
8	The natural setting or features in an area	<p>As noted above, Harrow Hill forms the natural setting of the area, with the school and surrounding residential areas on its slopes, St Mary's at the top of the hill and large tracts of open land at its base.</p> <p><b>Summary: the natural setting of the area is Harrow Hill and the open land that surrounds it.</b></p>
9	<p>Size of the population (living and working) in the area</p> <p>Electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a Neighbourhood Area; these have an average population of about 5,500 residents.</p>	<p>Based on the Local Land and Property Gazetteer (LLPG), there are approximately 2,506 residential properties in the area and 229 commercial properties, which include shops, education facilities, leisure facilities, doctors, offices, restaurants and pubs.</p> <p>Based on an average household size of 2.67 for Harrow on the Hill Ward, the 2,506 residential addresses in the area applied for translates into an indicative population of 6,685 people. The number of people living within the area is considered to generally reflect the 5,500 resident benchmark, noting that in the London context, populations covered by neighbourhood plans are often greater.</p> <p><b>Summary: the number of residents in the area applied for appears reasonable.</b></p>

7.5 Based on the above assessment against the NPPG, it can be concluded that whilst the Area of Special Character that forms the basis of the proposed neighbourhood area reflects the physical typography of 'the Hill', within that area there are a number of distinct character sub-areas, namely the residential / commercial village area which represents the location of the majority of the services in the area and community networks; Harrow School and John Lyon School estates, which are institutional in nature and with a distinctive built form; and the open land at the foot of the Hill, which is distinctly different in character to the rest of the proposed area and for which there is limited potential for urban expansion.

Figure 3: Neighbourhood Area (as applied for) and the extent of Metropolitan Open Land



Legend

- Metropolitan Open Land
- Area applied for by Harrow Hill Neighbourhood Forum

*Assessment against Factual and Policy Matrix section 2: Strategic significance of sites*

- 7.6 For the purposes of planning policy, there is not a definitive definition of strategic sites. As such, officers have considered if any land within the proposed neighbourhood area would be of strategic significance. Officers consider that the Harrow School allocation (within the Harrow Local Plan) is of strategic significance within the borough for the following reasons:
- a) Harrow's Core Strategy identifies Harrow School (along with John Lyon School) as a notable institution and major employer within the borough.
  - b) The School is an allocated site within the Harrow Site Allocations Local Plan (reference G01). The site allocation indicates that 'recognising the strategic importance of the School and its estate, the Council will support proposals for redevelopment that form part of an agreed masterplan to maintain or enhance the openness of Metropolitan Open and which secure community access to land and facilities. The Council will bring forward a supplementary planning document in partnership with Harrow School and the community to agree a masterplan to these ends'. The masterplan / SPD referred to in the site allocation was adopted in July 2015. The existence of a SPD as a relevant consideration for removing a strategic site from a proposed neighbourhood area was confirmed in *Daws Hill Neighbourhood Forum v Wycombe District Council* 2014.
- 7.7 It should be noted the Harrow School site allocation does not include a number of the School's boarding houses (i.e. Elmfield, Randalls, The Grove) or other buildings forming part of the Harrow School Estate (i.e. the Speech Room). These buildings are however contiguous to the Harrow School site allocation and have a discernibly different built character to the residential / commercial parts of the area (noting that boarding houses fall within the C2 Residential institution use class rather than C3 Dwelling houses, demonstrating that for planning purposes they are considered to be distinctly different in character). Furthermore, the Harrow School Site Allocation includes a number of buildings of a domestic residential nature (i.e. Yew Walk) or commercial nature (i.e. properties on the northern side of West Street) which have a character more similar to the surrounding residential / commercial areas than the School.
- 7.8 In light of the Harrow School allocation in the Harrow Local Plan, adopted Harrow School SPD (2015) and in the context of other Factual and Policy considerations addressed in this section, it is considered appropriate to exclude the majority of the Harrow School allocation from the proposed Neighbourhood Area, having regard to difference in character within the allocation (i.e. institutional / education buildings / grounds, in contrast to domestic residential dwellings / commercial properties) and in the interests of proper planning (as confirmed by the Court of Appeal).

*Assessment against Factual and Policy Matrix section 3: Consultation responses*

- 7.9 An overview of the consultation responses is provided in section 6 and the applicants' responses are included in Appendix 4.
- 7.10 Responses can be grouped into three categories and are considered below:
- a) Support for the proposed area
  - b) Requested inclusion of new sites within the area
  - c) Requested removal of sites from the area

*Support for the proposed area*

- 7.11 As noted above, 100 responses were supportive of the applications. Many of responses made general reference to supporting the concept of neighbourhood planning rather than making specific reference to the appropriateness of the proposed Neighbourhood Area or Forum.

*Requested inclusion of new sites*

- 7.12 Four responses requested that the proposed neighbourhood area was extended to include the full extent of the area covered by the Roxborough Residents Association (which covers both Roxborough Park and Roxborough Avenue). A further response requested an extension to the boundary further south of the private road of South Hill Avenue / Mount Park, to end at the start of Brooke Avenue. Section 61G(5) of the Act requires that the Council must designate some or all of a proposed neighbourhood area once an application is submitted. As such the Council is not able to designate additional areas to the original submitted neighbourhood area. Had the applicant undertaken more extensive consultation prior to submitting the neighbourhood area application, the desire for these residents to be included could have been reflected in the area applied for.

*Requested removal of sites*

- 7.13 Harrow School requested the proposed Neighbourhood Area to be 'significantly reduced at least to exclude the School's estate and other areas not represented'. The reasons put forward by the School are addressed as part of the assessment within this section. The School estate (including John Lyon School) is approximately 40% of the area applied for. The School has other landholdings interspersed throughout the area but these are generally individual residential or commercial properties indiscernible from surrounding residential properties.

### *Summary of Consultation responses*

- 7.14 Within the proposed neighbourhood area, consultation responses demonstrated support for the area by residents and businesses. However, this support was not universal when regard is given to the geography of the responses and the areas the respondents represent. Substantial areas were requested to be removed by landowners that would result in a significant portion of the eastern part / boundary of the area being removed, as well as a large area on the western boundary.
- 7.15 In light of the consultation responses supporting and objecting to the proposed area, officers consider that an appropriate alternative amended neighbourhood area should reflect the concentration of respondents in the west of the proposed area and should remove areas (set out below) as requested by landowners, having regard to other relevant considerations such as the character of these areas.

#### *Assessment against Factual and Policy Matrix section 4: The character of the proposed Neighbourhood Area*

- 7.16 The character of the proposed neighbourhood area is identified in a number of existing statutory development plan documents and conservation area designations.

#### *Harrow Core Strategy*

- 7.17 As noted above, the proposed Neighbourhood Area is based on the 'Harrow on the Hill Area of Special Character' identified in the Harrow Local Plan. This area has been included in various forms of the Harrow development plan since 1986 and used in the application of relevant policies within the development plan. Its definition and purpose pre-dates neighbourhood planning and it cannot be automatically assumed that it is an appropriate boundary for a Neighbourhood Area.
- 7.18 It is evident from the description of the Area of Special Character (see paragraphs 5.2 and 5.2 above) that within the area, there are distinct areas of different character, namely the historic hilltop settlement, Harrow School buildings, and the setting created by the major open areas around the hilltop settlement. The core of the Harrow School buildings and the open land at the base of the hill are distinctively different in character than the historic hilltop settlement which is residential in character, with some small businesses. This is evident in Figures 1 and 2 above, which show distinct differences in the settlement pattern across the area. It should be noted that the list of potential considerations for establishing appropriate neighbourhood area boundaries (see Table 2 above) does not list Local Plan designations as a typical basis for doing so.

## Conservation Areas

7.19 A significant proportion of the proposed Neighbourhood Area is covered by Conservation Areas designation (particularly the built-up areas), with there being a total of eight Conservation Areas. The character of these areas can be summarised as follows:

**Table 3: Character of area as defined by Conservation Areas within**

Conservation Area	Predominant character	Summary of architectural or historic interest
Roxeth Hill	Residential, with some commercial and community character	The conservation area forms one of the main approaches to the Hill from the south west. This 32 acre part of the western slope of Harrow on the Hill has an openly developed mainly residential, but also commercial and community character. The steeply sloping land throughout is the key defining feature. This provides good views of attractive buildings, particularly through staggered rooflines, and panoramic views out. The topography also affects density, with tight knit, small-scale terraces in small plots usually found along the lower slopes of the Hill, whilst larger villas and detached cottages and houses in larger plots are mainly found along the upper reaches.
Harrow School	Institutional (school, religious)	The Harrow School conservation area is set within Harrow to the south-west of the borough. It contains buildings that are some of the most well known in, and emblematic of, Harrow. St Mary's Church, for example, sits atop the hill, and is visible from all over the Borough. Just below it, the rooftops of Old Schools and Harrow School Chapel are also visible. Indeed, large, dramatic school buildings almost exclusively fill the conservation area and are crucial to its character. The topography and quality of the buildings combine to make this area particularly striking. Insulation by surrounding open-land creates a unique feeling of separateness from the rest of urban London and especially uninterrupted views across Harrow and towards the centre of London. The greenery in the form of trees, shrubbery and grass provides a leafy feel that breaks up the streetscene.
Harrow Park	Open Space with some low-density residential (Julian Hill / Harrow Park Road)	The character of the area is derived mainly from the spacious and open nature of the grounds of the golf course and the very low density of development. Extensive planting and tree cover combine with these factors to provide an almost rural setting. The landscaping makes this one of the most beautiful in the Borough, particularly in and around the outstanding Serpentine lake feature in the north east corner of the conservation area. The historic qualities of this landscaping have contributed to its designation as a historic park in 1999.
Harrow on the Hill Village	Residential, with some commercial / industrial	Harrow on the Hill Village Conservation Area forms the historic core of the Hill, scattered with the area's earliest buildings. Its unique townscape comprises a historical settlement of considerable antiquity and

Conservation Area	Predominant character	Summary of architectural or historic interest
	along High Street.	visual quality, set along an irregular network of ancient highways, and bounded by open spaces, which serve to accentuate its distinction from the surrounding London sprawl.
Sudbury Hill	Residential, with some larger buildings used for long-established health and educational facilities	Sudbury Hill Conservation Area forms the main approach to the Hill from the south and, at 77 acres (31 hectares), it is the largest conservation area in Harrow on the Hill. It is largely characterised by prominent detached and largely unchanged Victorian villas of great charm and character. Buildings form both individual landmarks and cohesive groups. There is a largely ribbon like plan form following the spine route of Sudbury Hill and London Road. This, combined with the winding nature of the roads, changes in gradient and dense vegetation, creates key internal views and an interesting and varied townscape. There are also key long distance and panoramic views due to the elevated land and detached nature of the properties to the north, and the more dispersed plan form and open land to the south.
South Hill Avenue	Residential / institutional (school)	South Hill Avenue Conservation Area is a particularly lush and pleasant part of Harrow on the Hill where a number of large, historic dwellings occupy a fine position on the Hill's undulating lower slopes. Here the quiet suburban streets are provided with a backdrop of greenery, with playing fields to the south and cricket pitches to the north. The visual quality of the streetscene is enhanced by densely planted gardens and lush boundaries. Such rich streetscape makes for a unique sense of place and high quality environment
Mount Park Estate	Residential	A number of handsome late Victorian and Edwardian houses occupy fine positions on the undulating lower slopes of Harrow Hill, forming the focus for the Mount Park Estate Conservation Area. The rich landscaped setting for these properties creates a feeling of seclusion and makes for an almost semi-rural character in what are otherwise urban environs.
Roxborough Park & The Grove	Residential and open space	Roxborough Park and the Grove Conservation Area is an attractive combination of high quality historic architecture and important public green open spaces, including the Grove Open Space and Church Fields, that serve to emphasize its distinction from the surrounding more modern commercial development of Harrow town centre and the other higher density urban sprawl. The area's undulating topography and unusually permeable pedestrian network complement and enhance the area's visual quality, creating attractive views within, into and out of the conservation area.

Note: the above is derived from the Character Appraisals for each Conservation Area, available: [http://www.harrow.gov.uk/info/200162/conservation/161/harrow\\_on\\_the\\_hill\\_conservation\\_areas](http://www.harrow.gov.uk/info/200162/conservation/161/harrow_on_the_hill_conservation_areas)

- 7.20 A number of small, isolated islands of residential development that are not included within Conservation Areas are however included in the Neighbourhood Area. The Harrow Characterisation Study<sup>1</sup> indicates these reflect a range of architectural style, including Post-War Mock Georgian, Post-War Infill Flatted Developments, and Modernist Flats. They are however residential in character, consistent with the surrounding area.

*Conclusion*

- 7.21 The assessment above demonstrates three distinct character types within the proposed Neighbourhood Area – large tracts of open space in the eastern part of the area (with one contiguous parcel of 100 hectares), large scale institutional buildings / grounds (Harrow School – northern central part of the area, John Lyon School on the western boundary) and residential areas with some commercial / industrial / educational activities (with the educational buildings within these areas being of a more modest area and indiscernible from surrounding predominately residential area) and open space. These are three quiet distinctive areas. Such variation in character within the proposed neighbourhood area applied for does not accord with NPPG paragraph 033 Reference ID: 41-033-20140306 bullet points 4, 5, 7 and 8.

*Officer recommendations*

- 7.22 In considering the various components of the factual and policy matrix as set out above, officers consider that on balance the entirety of the proposed neighbourhood area as submitted is not appropriate to be designated. Officers consider that the proposed neighbourhood area can be divided into three broad areas as outlined above, based on the factual and policy matrix, to inform their recommendations and the designation of a new amended Harrow Hill Neighbourhood Area. Table 4 below sets out the officer recommendations and reasoning for the inclusion or removal of each of these areas and Figure 4 shows these on a map.

---

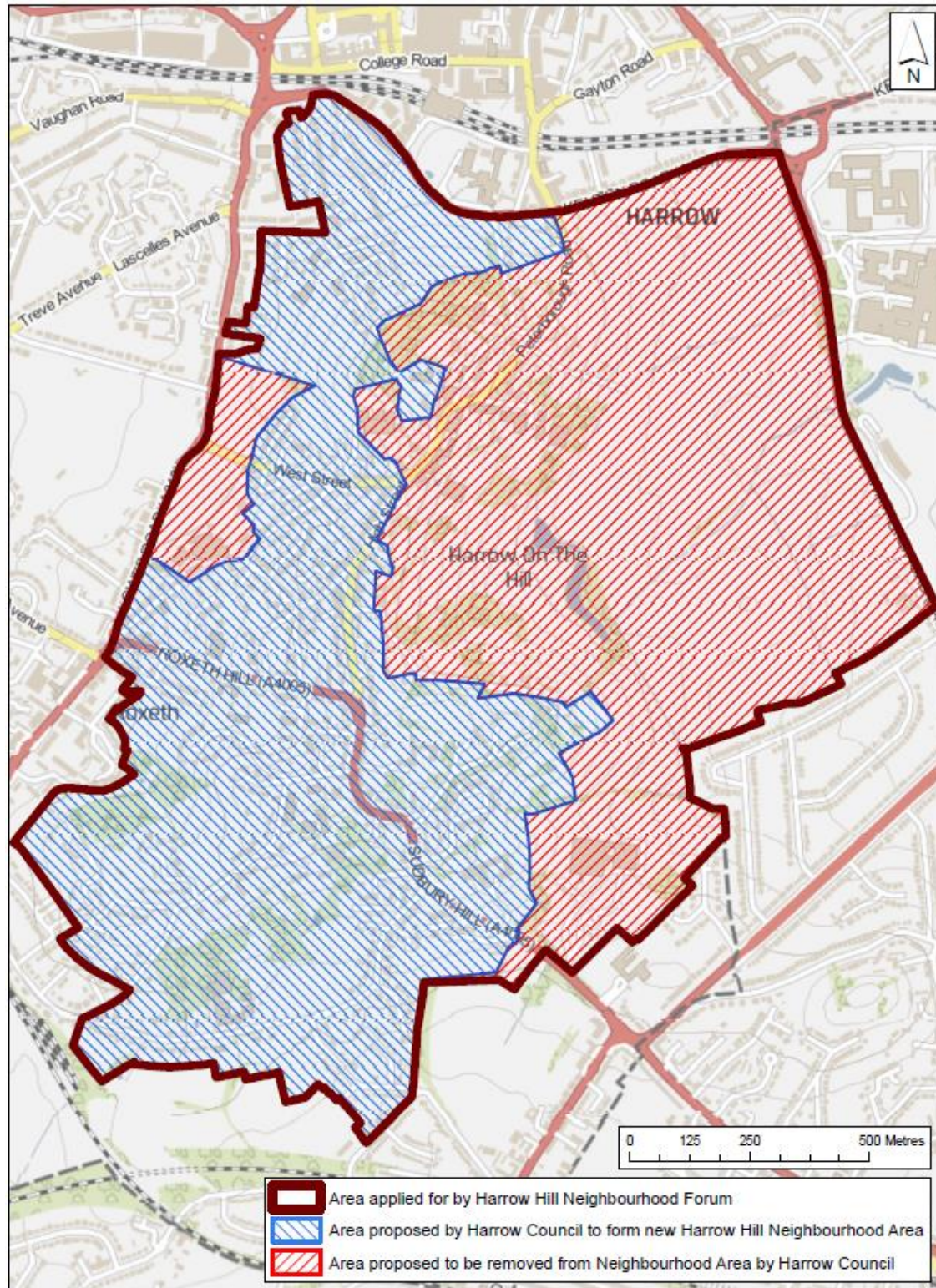
<sup>1</sup> See [http://www.harrow.gov.uk/download/downloads/id/1290/characterisation\\_study](http://www.harrow.gov.uk/download/downloads/id/1290/characterisation_study)



**Table 4: Areas recommended to be removed from area applied for**

Broad Area	Officer recommendation	Reasoning
Harrow School – built up area (as defined by Local Plan site allocation, Harrow School Conservation Area)	Remove	<ul style="list-style-type: none"> <li>• Educational institutional character (including boarding houses) distinctly different to surrounding areas</li> <li>• Strategic significance / site allocation</li> <li>• Area covered by proposals in the Harrow School SPD</li> <li>• Consultation response requested removal (noting that Harrow School is not represented on the Forum and there is no representation from this area – see section 8 below).</li> </ul>
Harrow School (MOL / site allocation)	Remove	<ul style="list-style-type: none"> <li>• Large tract of open land with character distinctly different to surrounding area</li> <li>• Forms one large contiguous area in the eastern part of the site – representing a clear boundary.</li> <li>• Strategic significance / site allocation</li> <li>• Consultation response requested removal (noting that Harrow School is not represented on the Forum and there is no representation from this area – see section 8 below).</li> </ul>
John Lyon School	Remove	<ul style="list-style-type: none"> <li>• Institutional character distinctly different to surrounding areas / located on edge of area applied for</li> <li>• Strategic significance / site allocation</li> <li>• Consultation response requested removal (noting that John Lyon School is not represented on the Forum).</li> </ul>
The Clementine Churchill Hospital	Remove	<ul style="list-style-type: none"> <li>• Institutional character distinctly different to surrounding areas / located on edge of area applied for</li> <li>• Not represented on the proposed Forum</li> </ul>

Figure 4: Harrow Hill Neighbourhood Area: Areas proposed to be removed.



© Crown copyright and database rights 2018 Ordnance Survey 100018208  
© 2018 Europa Technologies Ltd. All rights reserved.

Harrow COUNCIL  
LONDON

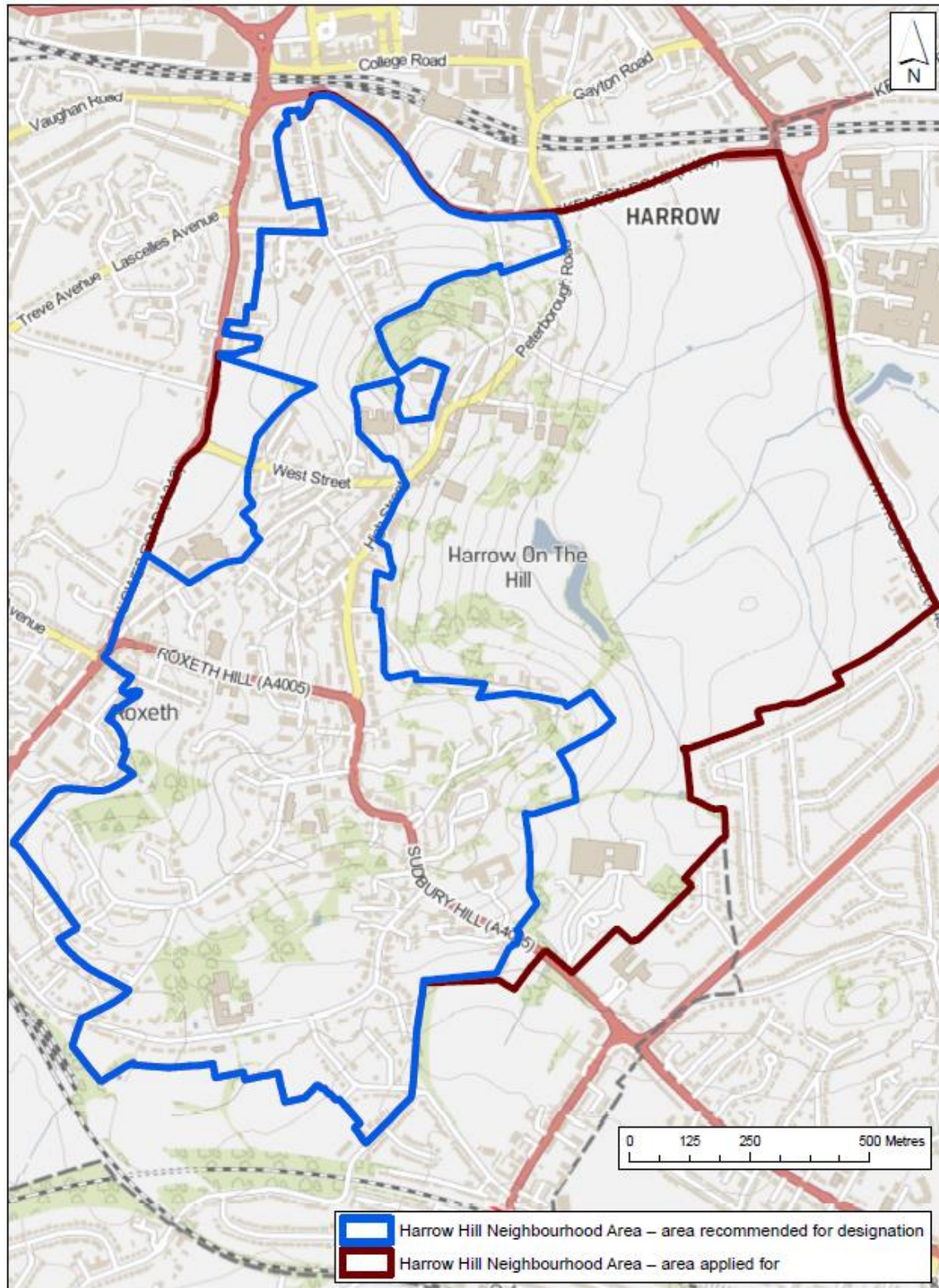
*Revised Harrow Hill Neighbourhood Area*

- 7.23 A revised boundary is depicted in Figure 5 reflecting the recommendations in Table 4. It excludes the following areas:
- a) The Harrow School estate to the east of the High Street / Peterborough Road, where the character of the buildings / area is institutional / metropolitan open land. Buildings to the east of the High Street owned by Harrow School but more commercial in nature / character, have been retained in the revised area. Boarding houses in the vicinity of Peterborough Road and Grove Hill and distinct from the surrounding area have been excluded due to their large, educational / residential institution character.
  - b) The Harrow School estate to the west of the High Street / in the vicinity of West Street that is educational institution in character (i.e. Ryan Theatre, Speech Room, Druries) have been removed. Properties owned by the School in this vicinity but more domestic residential in character (i.e. Yew Walk) have been retained in the area.
  - c) Churchfields has been retained in the revised boundary to reflect its open space / allotment / pathway function (noting the land is leased by Harrow School to the Council for these purposes).
  - d) Land owned by Harrow School to the west of the High Street and London Road has been retained as these are predominantly domestic residential and / or small scale land parcels surrounded by residential development. The character of the area is predominately residential / commercial, with some educational institution buildings interspersed throughout the area.
  - e) John Lyon School and the adjoining playing fields on the western boundary of the area have been excluded.
  - f) Clementine Churchill Hospital has been removed, as it has a distinctly different character and is on the periphery of the area.
- 7.24 The proposed boundary is considered to address legislative requirements and national policy guidance. It has taken account of consultation responses, it reflects local character types, where existing communities are located and it acknowledges the strategic significance of sites within the area.
- 7.25 The revised proposed area measures 118 hectares compared to the 240 hectares for the area applied for. Although this is significant decrease in size (51%), the revised area will retain 95% of the residential properties in the area applied for (2,388 of 2,506 residential addresses) which reflects the character of the areas recommended to be removed, namely large tracts of continuous open space and large scale educational institutions (including boarding houses). The decrease in non-residential properties is greater at 32%

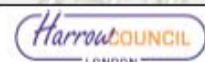
(156 properties in the recommended area compared to 229 in the area applied for). This again reflects that the areas recommended to be removed are predominately non-residential, namely educational institutions.

- 7.26 The revised Neighbourhood Area will mean that the following Conservation Areas are not included in the revised neighbourhood area in their entirety: Harrow Park Conservation Area, Harrow on the Hill Village Conservation Area, Roxborough Park and The Grove Conservation Area and a small portion of the Sudbury Hill Conservation Area. It would be preferable that such a situation is avoided (as per Historic England's advice). The only way to do this would be to designate the entire Neighbourhood Area as applied for, but without representation from Harrow School and John Lyon School (40% of the area), no Neighbourhood Forum could be designated. Alternatively, all of the area of the affected Conservation Areas could be excluded from the proposed Neighbourhood Area, but this would further reduce the area applied for and impact upon a greater number of domestic residential properties.
- 7.27 Establishing the suitability of a neighbourhood area includes the consideration of a number of factors, as set out in planning practice guidance. The assessment above notes significant differences in character within the area applied for and the proposed revised boundary largely reflects this. The Council has prepared character appraisals for conservation areas within the proposed neighbourhood area boundary. The Council considers using existing character appraisals as an evidence base, and engagement with the Council's Conservation Officer will ensure consistency and address Historic England's comments. It is therefore not proposed to amend the boundary in this regard.
- 7.28 The revised boundary excludes the majority of the Harrow School site allocation, which also forms the boundary of the Harrow School SPD. Some areas of the site allocation / SPD area are proposed to be retained in the neighbourhood area having regard to the character and function of those areas (i.e. domestic scale residential areas); the SPD does not include any specific proposals for these areas which reduces the potential for conflict between the SPD and any draft neighbourhood plan. The eleven key projects identified in the SPD (Core Landscape; Sports; Science; Music; Drama; Minor Sport; Entrance Building; Visitor parking; Re-routed access road; Dining Halls Service Area and Relocated 5-a-side) and the additional staff accommodation on Harrow Park do not fall within the revised boundary.

**Figure 5: Harrow Hill Neighbourhood Area: Area applied for compared to area recommended to be designated**



© Crown copyright and database rights 2018 Ordnance Survey 100019208  
© 2018 Europa Technologies Ltd. All rights reserved.



## **8. Officer Assessment – Neighbourhood Forum**

- 8.1 As noted above, the Act sets out four criteria which the Council is required to consider in determining an application to designate a neighbourhood forum:
- a) It is established for the express purpose of promoting or improving the social, economic and environmental wellbeing of an area that consists of or includes the neighbourhood area concerned;
  - b) Its membership is open to individuals who live in the neighbourhood area, individuals who work there (whether for businesses carried on there or otherwise) and individuals who are elected members (for London in respect of a London borough council) any of whose area falls within the neighbourhood area concerned;
  - c) Its membership includes a minimum of 21 individuals each of whom live in the area, work in the area or are elected members for the area; and
  - d) It has a written constitution.
- 8.2 The Act also requires the Council, in considering whether to designate a neighbourhood forum, to consider whether the:
- a) Forum has secured, or taken reasonable steps to secure, membership that includes at least one individual from the three categories i.e. people who live, work or are elected members for the area;
  - b) Membership is drawn from different places in the area and different sections of the community in the area; and
  - c) The purpose of the forum reflects (in general terms) the character of the area.
- 8.3 Officers have assessed the proposed Forum in relation to the submitted proposed neighbourhood area.
- 8.4 Officers consider that the proposed Forum meets requirements the first two requirements outlined in paragraph 8.1 above (i.e. purpose and open membership) as these are clearly stated in the draft constitution.
- 8.5 Officers however consider that at the time the application was made, the proposed Forum did not have the minimum 21 members required under the Act. Whilst the application material listed 23 names of members, three of those members have written to the Chairman / the Council during the consultation period indicating that they were not aware of the applications being collectively agreed by the proposed Forum and submitted to the Council, nor had they agreed to their names being included in the list of members.
- 8.6 Discussions with HB Law have confirmed that if at the time of determining the 'forum designation application' its membership comprises less than 21 individuals, the Council should refuse the

'forum designation application' on the basis that its membership does not meet the criteria in section 61F(5)(c). If the 'forum designation application' is refused, the Council would not have the authority to designate a neighbourhood area. However, the timing for meeting this requirement is at the time the application is decided (rather than when made). Essentially, if the proposed Forum comprises 21 members at the time the Council determines the 'forum designation application', who in the opinion of the Council fairly represent the proposed neighbourhood area, the Council can designate the body as a neighbourhood forum and proceed to designate a neighbourhood area. The applicant has provided a revised list of members that exceed the 21 members required (see Appendix 2).

- 8.7 In terms of the proposed constitution, this is understood to be based on that used by other Neighbourhood Forums. Some of the representations against the proposed forum criticise the constitution in terms of quorums etc. This is however considered a matter for the group. From some of the responses (i.e. Harrow School, John Lyon School), the proposed constitution is one reason why they do not wish to participate as it means they / their representative would only have one vote despite being a significant portion of the proposed area (noting however that under the Act, only individuals can be members of the Forum).
- 8.8 In regard to the three further considerations identified in paragraph 8.2, officers consider that whilst a comparatively limited amount of publicity and community engagement has been undertaken in relation to securing membership (compared to other Forums), the Forum has members from the three required categories (residents, businesses, elected members).
- 8.9 Figure 6 shows the geographic spread of individuals listed on the revised Forum Membership list, based on the centre of postcode areas (for privacy reasons). From this figure it is evident that the forum does not have members from a significant proportion of the area applied for, namely the eastern part of the area occupied by Harrow School and John Lyon School (two of the largest educational institutions in the area by site area) and which collectively make up in excess of 40% of the area. There is also limited representation from the area to the north-east of Sudbury Hill. The location of members is a critical consideration in determining whether the membership is drawn from different sections of the community within the proposed neighbourhood area. The majority of the members are located in residential character areas of around Roxeth Hill and West Street, with there being significant areas where there is no representation on the Forum. It is also noted that a number of Forum members appear to be related and / or living / working at the same addresses, diminishing the extent that the listed 25 members can be considered representative of the area / community.
- 8.10 As such, officers do not consider it desirable to designate the proposed forum as a neighbourhood forum in relation to the entirety of the proposed area applied for due to the fact that membership is not

drawn from different places within the full extent of the neighbourhood area applied for.

- 8.11 Daws Hill Neighbourhood Forum v Wycombe District Council 2014 confirmed that the designations of a neighbourhood area and neighbourhood forum are 'inextricably interlinked'. The fact that Membership of the proposed Forum is not drawn from different places in the neighbourhood area means that it is not appropriate for the Council to designate it as the area for which the Forum is authorised to act in relation to. The application to designate a neighbourhood forum included three people who have advised that they consider that they had not expressly given their consent for the application to be lodged naming them as members and have asked not to be included in the membership list. Two of these individuals represent institutions comprising in excess of 40% of the neighbourhood area applied for. Consequently, the forum does not adequately represent the area applied for and without revision of the area applied for (based on the issues addressed in Section 7 above), the Forum application would need to be refused as it fails to meet the requirements of the Act.
- 8.12 Detailed assessment of the proposed boundary against the requirements of the Act and NPPG indicate potential issues with respect to the geographic appropriateness of the boundary; such considerations become even more relevant in the context of the concerns regarding the representativeness of the proposed Forum relative to the geographic area applied for. Section 7 above recommends an amended boundary based on a Factual and policy matrix outlined in Table 1.
- 8.13 An alternative to amending the proposed neighbourhood area would be to refuse the application to designate a neighbourhood forum on the basis that its membership is not geographically representative of the area applied for. This would however mean that no forum could be designated unless there was representation from the area covered by both Harrow School and John Lyon School. Without a designated forum, it is not possible to prepare a neighbourhood plan.
- 8.14 The applicant has asserted that it is not possible to have representation from areas covered by playing fields / open space (i.e. the majority of the area proposed to be excluded from the area applied for). In the case of Harrow School and John Lyon School, these areas form part of the overall schools where people work (and in the case of Harrow School, also live). Consequently these areas could be represented on the Forum by individuals who live and / or work there (and this was reflected in the original membership list and draft constitution).
- 8.15 The recommended amendments to the neighbourhood area applied for does not result in any members of the Forum being excluded on the basis that live or work outside the new boundary, demonstrating that the areas proposed to be removed are not represented on the Forum. Figure 7 below shows the membership of the proposed Forum relative to the recommended revised area. This shows a more closely



aligned relationship between the recommend area and the membership of the proposed Forum.

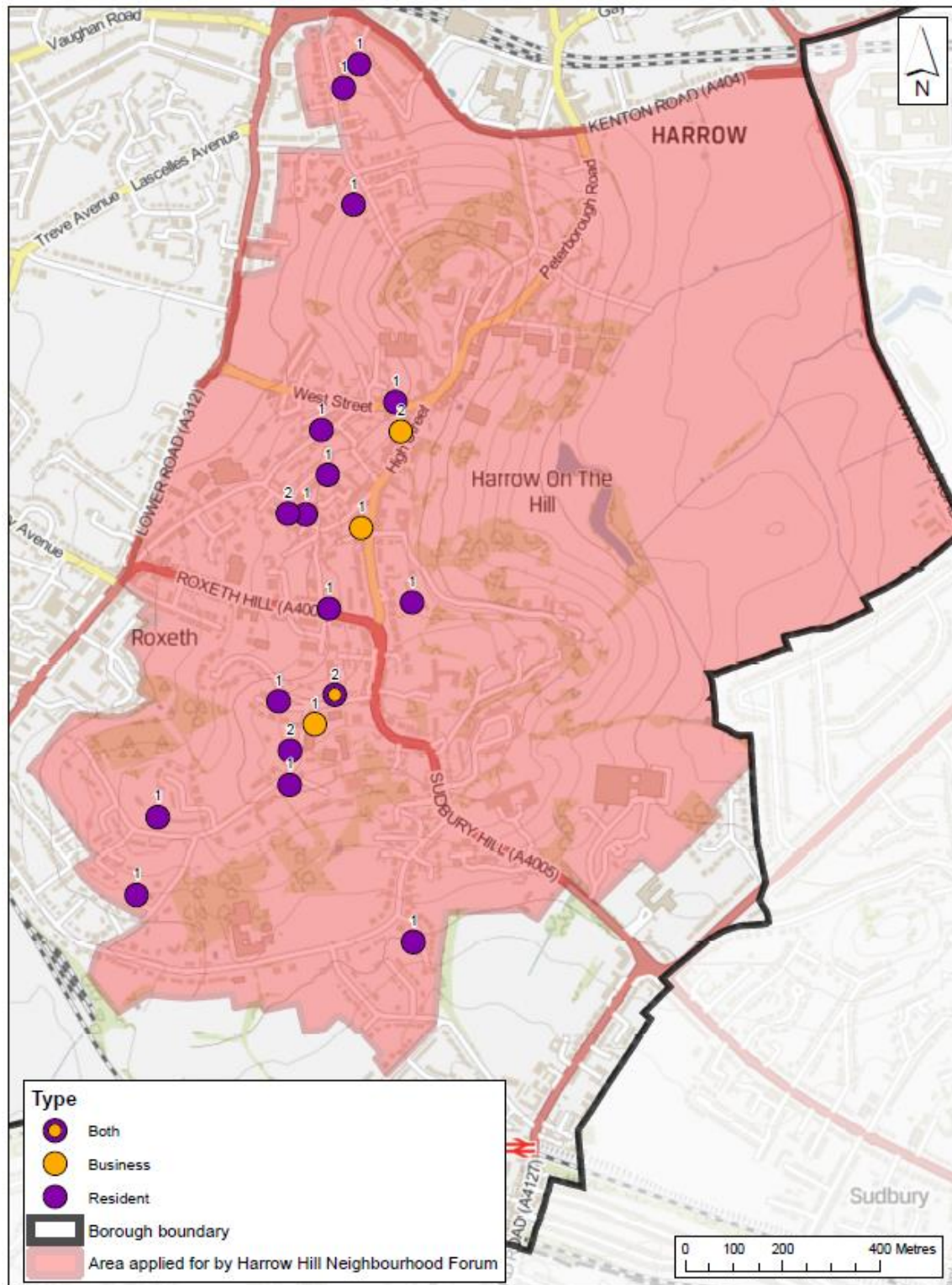
- 8.16 The draft Constitution will need to be amended to reflect the area recommended to be designated as it currently refers to the area applied for (i.e. the Harrow Hill Area of Special Character).
- 8.17 It is noted that paragraph 20 of the proposed Constitution indicates that 'Councillors representing the Harrow on the Hill Ward in Harrow Council will be invited to all Executive Committee meetings and will have the same voting rights as Executive Committee members'. In this regard, parts of the neighbourhood area applied for and also the area recommended to be designated include parts of Greenhill Ward. Consistent with the requirements of the Act that the Forum has secured, or taken reasonable steps to secure, membership that includes at least one individual from the three categories i.e. people who live or work in the area or are elected members for the area, the draft Constitution should be amended to also refer to Greenhill Ward Councillors.
- 8.18 As noted in paragraph 5.6 above Council officers had limited input into the appropriateness of the proposed neighbourhood area and that these discussions were in the context of assurances that both Harrow School and John Lyon School were fully supportive of the forum and application. The outcomes of the consultation process undertaken after the applications were submitted (citing employees of Harrow School and John Lyon School as members) indicate that this was not the case and it is not reasonable for officers to be held to any informal opinion on the appropriateness of the boundary and the representativeness of the Forum expressed prior to the applications being lodged since circumstances (i.e. forum membership) have changed significantly.
- 8.19 It should also be noted that initial comments related to the statement and whether or not the contained the information required by the Act, not an assessment of the merits of the application. Similarly, the decision to commence consultation on the applications was on the basis that the submitted material included the information required under the Act rather than an assessment of the merits of the applications.
- 8.20 It should also be noted that the Forum application material (but not the draft constitution itself) indicated that 'Forum Committee Members details are available to the Council but not for general publication'. In the interests of transparency and to enable anyone with an interest in the applications to determine whether or not they meet the requirements of the Act (i.e. type of member, geographic spread of membership), this information [names, nature of interest in area (i.e. resident, business, elected member) and post code] were published as part of the consultation process; such an approach is followed by other local planning authorities. By doing so, three persons listed as members of the Forum became aware that they had been listed as members even though that they consider that they were unaware of

the applications being lodged and had not expressly given their consent to be listed as members on the application. Officers will therefore continue to ensure that where appropriate, such details are public whilst addressing any privacy issues under relevant legislation.

#### *Conclusions - Forum*

- 8.21 The Forum application is considered to meet the requirements of the Regulations apart from the representation of the members from different places within the proposed neighbourhood area. In this regard, the recommended amendments to the neighbourhood area mean that the membership is more closely into alignment with the area it would be authorised to act in relation to. There however remain a number of locations where the representation is poor. It is hoped that this will change as work progresses on any neighbourhood plan. Officers will keep Forum membership (and other matters) under review, noting that the Act allows the LPA to withdraw a designation where they consider that the Forum is no longer meeting the conditions by reference to which it was designated (i.e. if its Membership was no longer drawn from different places in the area).
- 8.22 A number of minor amendments are required to the draft Constitution to reflect the revised neighbourhood area (if designated) and its inclusion of parts of Greenhill Ward.

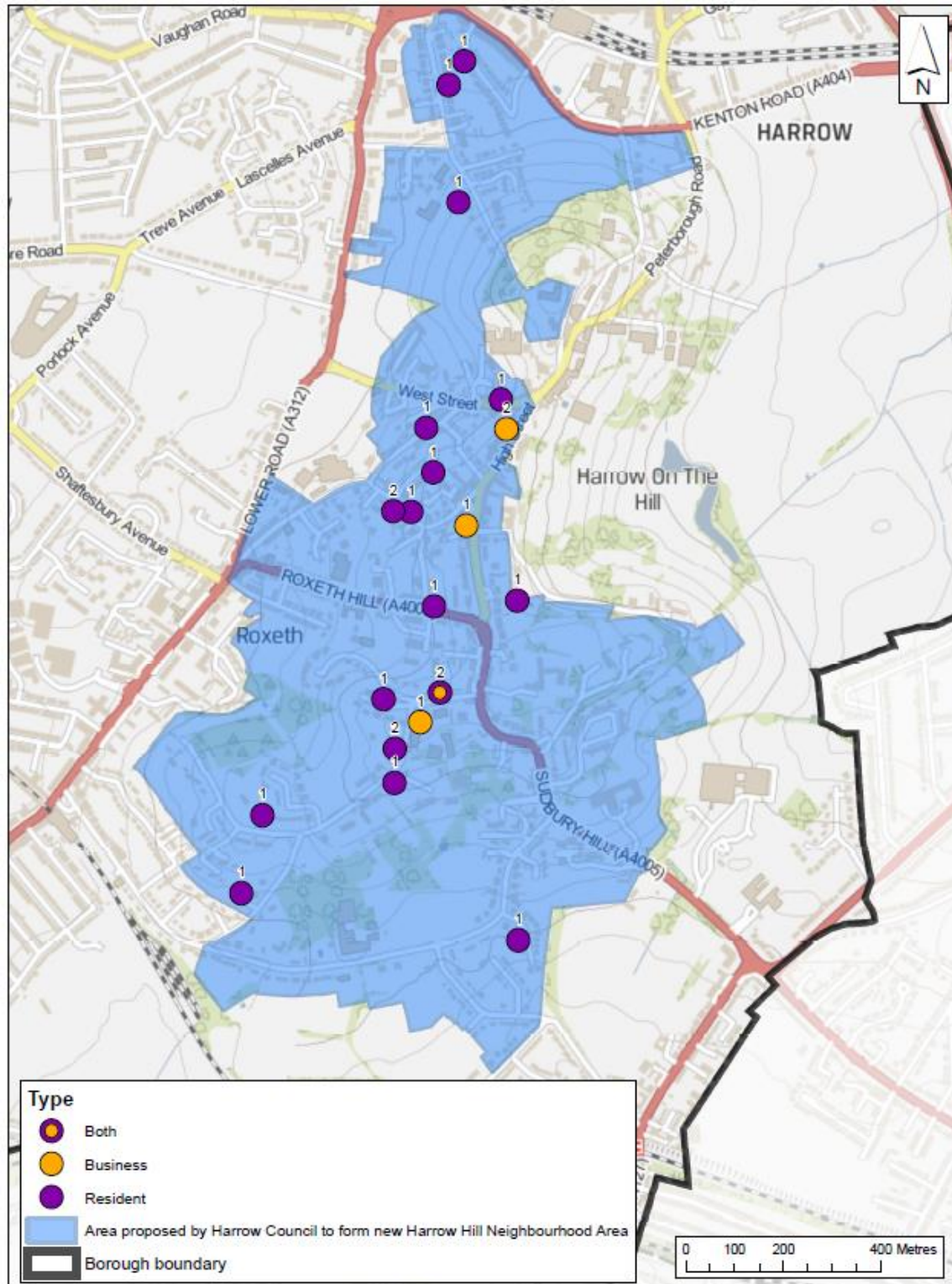
Figure 6 – Forum Membership (revised) – geographic spread relative to area applied for



© Crown copyright and database rights 2018 Ordnance Survey 100019206  
 © 2018 Europa Technologies Ltd. All rights reserved.

Note: based on centre of post code provided with the revised Forum membership list.

**Figure 7 – Forum Membership (revised) – geographic spread relative to area recommended to be designated a neighbourhood area**



© Crown copyright and database rights 2018 Ordnance Survey 100019206  
 © 2018 Europa Technologies Ltd. All rights reserved.

Note: based on centre of post code provided with the revised Forum membership list.

## **9. Next Steps**

9.1 Subject to the decisions made by Committee (including any requested amendments), officers will publish the below documents, in accordance with the Neighbourhood Planning Regulations as soon as possible on the Council's website. Consultation respondents and relevant stakeholders will be notified of the decisions. The documents to be published are:

- a. Harrow Hill Neighbourhood Area Decision Document; and
- b. Harrow Hill Neighbourhood Forum Decision Document.

## **10. Performance Issues**

10.1 Local Authorities have a statutory duty to facilitate neighbourhood planning, including making timely decisions where required. Initial discussions have been held with the proposed Neighbourhood Forum to understand their aspirations and how these may be achieved through the Neighbourhood Planning process. An on-going dialogue will be sought with the Forum to assist in their preparation of the draft Neighbourhood Plan and to aid resourcing and programming of the process within the Council. Many of the issues identified by the Forum cut across several Council directorates and a robust internal process will need to be established to ensure meaningful cross-Council engagement in the process and successful implementation of any Neighbourhood Plan.

## **11. Environmental Impact**

11.1 The potential environment impact of a draft Neighbourhood Plan is at the heart of the process, as the Neighbourhood Forum must demonstrate that a draft Neighbourhood Plan (or Order) contributes to sustainable development. This basic condition is consistent with the planning principle that all plan-making and decision-taking should help to achieve sustainable development. The Forum must demonstrate how its plan or Order will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures). Any proposals / conclusions will be tested at Independent Examination.

## **12. Risk Management Implications**

Risk included on Directorate risk register? No

Separate risk register in place? No

There are no significant risks arising from the designation of the proposed Neighbourhood Area and Neighbourhood Forum.

### **13. Legal Implications**

- 13.1 The Regulations set out the statutory requirements that applications to designate a neighbourhood area or designate a neighbourhood forum must meet. These are outlined in section 4 above. Sections 7 and 8 assess the applications against these legal requirements.
- 13.2 Once adopted a neighbourhood plan will form part of the development plan for the borough. There is a duty upon the Council to provide support and advice to communities wishing to bring forward a neighbourhood plan under the Neighbourhood Planning Regulations. The designation of a Neighbourhood Forum also ensures that the Council as local planning authority has a responsibility to consult the Forum in relation to plan making and planning applications received (those that the forum has indicated it wishes to be consulted upon).

### **14. Financial Implications**

- 14.1 The Department of Communities and Local Government provides financial support to local planning authorities (LPA) where neighbourhood planning is being progressed. The support is £5,000 for each Neighbourhood Area or Neighbourhood Forum designated (up to a maximum of five of each), and £20,000 once the LPA has set a date for a referendum following a successful examination where a neighbourhood plan has not previously been made for that area.
- 14.2 Should the Council favourably consider and approve the current applications for a Neighbourhood Area and Neighbourhood Forum, the Council should be able to claim £10,000 via the Government's online claims system. This grant can only be spent on neighbourhood planning. Experience of other boroughs however suggests that the grants are not sufficient to cover the revenue costs of considering and publicising the applications (i.e. letter drops and other publicity), as well as staff costs. Any costs above this grant amount will need to be met from the existing revenue budget for the Planning Policy Team. This has necessitated re-profiling of some of the proposed work programme as dealing with the current applications was not foreseen as the applicant failed to meaningfully engage with officers prior to submitting the application.

### **15. Equalities implications / Public Sector Equality Duty**

Was an Equality Impact Assessment carried out? See Appendix 5.

- 15.1 Any Neighbourhood Plan will become part of Council's development plan and must be in general conformity with the strategic policies of the Local Plan, which were subject to an Equality Impact Assessment. However, as the scale of a Neighbourhood Plan is much more local, the applications to designate a Neighbourhood Area and a Neighbourhood Forum have been subject to an Equality Impact Assessment which is included as Appendix 5. The assessment concludes there are no negative impacts at this point in time, noting that the forum's constitution states membership is open to everyone

who lives, works, undertakes business or is an elected member in the area. Their key objectives reflect they wish to engage with the wider community and foster community spirit.

15.2 A further assessment will need to be undertaken when the draft Neighbourhood Plan is submitted to the Council.

15.3 The Neighbourhood Planning Regulation 2012 requires the Council to ensure that those applying for neighbourhood forum and neighbourhood area status are representative of the area to be covered, or at least reasonable efforts undertaken. Harrow Hill Neighbourhood Forum is considered to satisfy this requirement (if the area is revised to exclude Harrow School and John Lyon Schools).

## 16. Council Priorities

16.1 The decision sought will help the Council meet the priority of a making a difference for communities by helping ensure the attractiveness of the borough as a place to live and demonstrating that the Council seeks and listens to the views of its residents.

## Section 3 - Statutory Officer Clearance

Name: Jessie Man	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 15.1.2018		
Name: Mrinalini Rajaratnam / Jimmy Walsh	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 12 January 2018		

Ward Councillors notified:	<b>YES</b>
EqlA carried out:	<b>YES</b>
EqlA cleared by:	See body of report

## **Section 4 - Contact Details and Background Papers**

**Contact:** David Hughes, Planning Policy Manager, 0208 736 6082

**Background Papers:**

National Planning Practice Guidance on Neighbourhood Planning:  
<https://www.gov.uk/guidance/neighbourhood-planning--2>