

# **Harrow Hill Neighbourhood Plan – applications to designate Neighbourhood Area and Neighbourhood Forum**

## **Compiled responses to consultation for applicants' consideration**

### **Overall figures**

1. A total of 122 consultation responses were received during the consultation period.
2. 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
3. The nature of the responses can be grouped as follows:
  - 100 responses were supportive of the forum and / or area, or the 'neighbourhood plan' in a general sense.
  - 5 responses were supportive of the forum and area, but sought an extension of the area
  - 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)
  - 3 responses objected to their names being included on the list of Forum members and the process upon which the applications had been made
  - 8 responses (6 individuals and 2 community groups) objected to the neighbourhood forum (1 individual did however support the proposed area)
  - 1 response requested revisions or removal from the proposed area, as well as objecting to the validity of the two applications overall.
4. Below are the responses for categories (a) to (f) above, with individual names / details removed [except for (d)].

**100 responses were supportive of the forum and / or area, or the 'neighbourhood plan' in a general sense.**

No	Comment	Postcode
1	This is just to say that I firmly support the Neighbourhood Plan for the Area of Harrow on the Hill.	
2	As a user and a visitor to Harrow on the hill, I support the plan as laid out	HA9 9SJ
3	<p>I am very much in favour of this Neighbourhood Plan.</p> <p>Harrow on the Hill is a village of special character, that must be actively maintained. We are a close-knit community here, and involve ourselves in the preservation of the characteristics of the area - but we require a stronger framework within which to work, in order to protect this area from destructive changes that are driven not by consideration for the residents, or for the School, or for the nature of the area - but by carelessness, neglect and greed. Once the characteristics are lost, they will be lost for every generation to come.</p> <p>Please allow this Neighbourhood Plan to be implemented.</p>	HA1 3EL
4	<ul style="list-style-type: none"> <li>• The proposal is to include the (major part of) several Conservation Areas and Area of Special Character on and around the Hill, largely to give them greater protection than they have at present</li> <li>• In essence the proposal has been welcomed by people who believe it presents an opportunity to have a greater say and to obtain more control over what happens in this area</li> <li>• I think the proposed Neighbourhood Area as shown on the map submitted with the application identifies this and I accept it</li> <li>• I am not sure about the purpose and role of the Neighbourhood Forum as I feel I do not know enough about it - although I have been making some enquiries and hope to continue to do so</li> <li>• I think there has been insufficient Public Consultation on the whole: I attended the meeting at St Dominic's held in May 2016. People were invited to give their views on the proposal and these were written on charts. I cannot trace that these comments have been distributed to those who attended the meeting - I cannot find such advice. Nor that there have been any more public meetings held in the period</li> <li>• I also note that in the documents submitted to you (Nos. 1 and 2) reference is made on several occasions to various entities - might be called "interested parties" for want of a better description - from whom it seems support is presumed. Although again I cannot trace written confirmation of this given within the period ended 31st October 2017 when the consultation commenced. Again, I need to carry out more research to trace this.</li> </ul>	

No	Comment	Postcode
	<ul style="list-style-type: none"> <li>I appear to be the only School Governor representative - as an Associate Member of on to the Forum</li> </ul>	
5	I work on Harrow on the Hill and support the proposed Neighbourhood Area and Neighbourhood Forum.	
6	I am writing in to support the proposed Harrow Hill Neighbourhood Area and Neighbourhood Forum.	HA1 3LP
7	Having reviewed the application, we are supportive of the application for the formation of the Harrow Hill Neighbourhood Area and the Harrow Hill Neighbourhood Forum.	HA2 0HY
8	I oppose the existing application by Harrow School to extend their theatre and sports facilities; as this will be detrimental to the local community and environment. I support The Local Neighbourhood Plan which offers a more acceptable and less damaging proposal. We need open green spaces in urban areas and visual access to important views be maximised.	
9	I support the proposed Neighbourhood Area and Neighbourhood Forum.	E1W 1YW
10	<p>I agree with the purpose and role of the proposed Neighbourhood Forum.</p> <p>I have lived on the Hill for over 40 years and really love this wonderful community. I would very much welcome the opportunity for this community to have a direct voice in its development and growth.</p>	HA2 0JD
11	I wish to express my support for the proposed Harrow Hill Neighbourhood Area and Neighbourhood Forum. I feel it would bring the residents together and create a great neighbourhood spirit which is lacking at the moment and very important to maintain the spirit of Harrow Hill area.	HA2 0JQ
12	As a resident of Harrow on the Hill at XX Byron Hill Road I write to confirm my general support for an official Harrow Hill Neighbourhood Forum, so that as residents in the area we can have a greater say in the decisions made on issues which affect us directly as a community	Byron Hill Road
13	I am a resident of Harrow on the Hill and I would like to confirm that I support the proposed Neighbourhood Area and Neighbourhood Forum.	Middle Path
14	I am writing to express my support for the formation of a neighbourhood plan for Harrow-on-the-Hill. I am a resident of Nelson Road.	Nelson Road
15	I am emailing to say that as someone who works on Harrow on the Hill, I support the proposed Neighbourhood Area and Neighbourhood	HA1 3LP

No	Comment	Postcode
	Forum.	
16	I understand that a forum is being considered for the local residents and businesses that are on Harrow on the Hill and am in favour of the proposed forum.	HA1 3LP
17	I have read the proposed documents and agree with the role and purpose of the Neighbourhood Forum	
18	I am writing to express my support for the proposed Harrow on the Hill Neighbourhood Area and Neighbourhood Forum.	
19	<p>I would just like to add my support for the Harrow on the Hill Neighbourhood Plan.</p> <p>I feel it is important that those who live and work in the area, have a say in shaping it's future.</p>	HA1 3ET
20	I am in favour of the Harrow Hill neighbourhood plan, boundary and forum.	HA1 3JP
21	I am in favour of the Harrow Hill Neighbourhood boundary and forum.	HA 1 3JP
22	<p>I've been following news on Development plans for Harrow on the Hill. In particular what appear wide differences between members of the local community, planners and local businesses, in particular Harrow School.</p> <p>I am keen for open and balanced debate to gain consensus among different voices. For this reason I support the Neighbourhood Plan being promoted for the Area of Harrow on the Hill.</p> <p>I live in Cunningham Park and regularly walk around the Hill area.</p>	
23	<p>THAT the Harrow Hill Trust hereby agrees to support the current application to the Council for the designation of Harrow Hill Neighbourhood Plan Area and the application for designation of the Harrow Hill Neighbourhood Forum on which the HHT is represented, so as to produce a Neighbourhood Plan for the area.</p>	
24	<p>The Roxborough Residents' Association supports the idea of the Harrow Neighbourhood Plan. We appreciate that there are matters still to be resolved about the boundaries of the Neighbourhood Area, but feel confident that these can be resolved without difficulty. We feel that the Neighbourhood Plan could make an important contribution to planning policy in the area.</p>	
25	<p>I am emailing to support the Harrow Hill community group application to Harrow Council to set a boundary for a Neighbourhood Area and to be formally designated as a Neighbourhood Forum. Think this is a great initiative and wish it had happened years ago.</p>	

No	Comment	Postcode
26	I am writing to confirm that I support this application.	
27	I support the proposed Neighbourhood Area and Neighbourhood Forum.	
28	I strongly support the proposed Harrow on the Hill Neighbourhood Area and Neighbourhood Forum.	
29	We support the proposed Neighbourhood Area and Neighbourhood Forum.	HA1 3NH
30	As Harrow on the Hill residents, we support this application.	
31	Please treat this email as support for the Neighbourhood Plan for Harrow on the Hill, on behalf of both myself and my wife.	HA1 3EL
32	This is to confirm my support for the proposed Neighbourhood Forum and Area.	High St
33	I support the proposed Neighbourhood Area and Neighbourhood Forum.	
34	<p>I am writing to you to say that I support the Neighbourhood Area Plan and Forum being put forward for Harrow in the Hill.</p> <p>I live in this area at XX Pickwick Place, HA1 3BG and have done so for over 20 years. I am also the Treasurer of the Roxborough Residents Association.</p> <p>The Area in question not only includes Conservation areas but also an area of Special interest, these need to be properly maintained and preserved.</p> <p>All the people living in this Area should be able to have a say and a make a commitment to its well-being through the Forum.</p>	HA1 3BG
35	<p>I am resident of no. 9 Nelson Road which is within the proposed Harrow on the Hill Neighbourhood Area for consultations.</p> <p>In light of recent unpopular developments in the area I feel it would be useful and positive for residents to have a framework from which to address local issues, which are otherwise ignored or swept under the rug. For this reason I am writing in support of the proposed Neighbourhood Forum.</p>	
36	I support the proposal for the formation of the HOTH Neighbourhood Plan.	HA1 3EN
37	This is to indicate that I am a resident of harrow on the hill and that I support the creation of the forum.	

No	Comment	Postcode
38	As a resident in the area concerned, I wish to indicate my support for the application to set up a Neighbourhood Area embracing Harrow on the Hill and a Neighbourhood Forum. I hope this will give residents a stronger voice in regard to planning decisions that directly affect our local environment.	HA1 3 ET
39	I support the Harrow Hill community group application to Harrow Council to set a boundary for a Neighbourhood Area and to be formally designated as a Neighbourhood Forum.	HA1 3ED
40	I support the proposal	
41	As a business owner, employer and Freeholder on Harrow on the Hill, I support the proposed Neighbourhood Area and Neighbourhood Forum.  I am very concerned to see that Harrow on the Hill's special status is maintained and protected.	HA1 3LP
42	I am happy to support this proposal but would request that membership is required to be representative of the wide diversity of the whole area and that quoracy of both general membership meetings and executive committee is also sufficient to ensure appropriate locally inclusive decisions are made and that it is not allowed to make decisions based on just a few.  Therefore the numbers quoted on page 6 ( Nos 13 and 15) in my opinion need review *The suggestion that a minimum 21 general members with a quoracy of 30% (7) and an executive committee of a minimum of 5 with a > quoracy of 60% (3) seems too few to be representative of us all.  It also needs to ensure that all those who are resident or hold businesses in the agreed area are all automatically made members, and can see agendas prior to meetings, can comment on proposals beforehand and are updated on line with emailed minutes following all meetings.  Ps just to clarify I am not opposed in principle to creating the Harrow Hill Neighbourhood Forum	West Street
43	I work in Harrow on the Hill for Woodward Surveyors and wish to express my support for the proposed Neighbourhood Area and Neighbourhood Forum	
44	I support the proposed Neighbourhood Area and Neighbourhood Forum	
45	My husband and I support the Neighbourhood area and neighbourhood forum for Harrow On The Hill.	
46	I support the proposed Harrow Hill Neighbourhood Area and Neighbourhood Forum.	Resident and owner of

No	Comment	Postcode
		property on South Hill Avenue
47	<p>I am a resident / homeowner on Harrow on the Hill and have been so since 2001.</p> <p>I am writing to confirm that I support the proposed Neighbourhood Area and Neighbourhood Forum.</p>	W1U 6AG
48	I fully support the formation of a Harrow Hill Neighbourhood Forum.	Edward Court Management
49	I support the proposed Neighbourhood Area and Neighbourhood Forum.	King Henry Mews
50	I support the proposed Neighbourhood Area and Neighbourhood Forum.	
51	This is to express my strong support for the setting up of the Harrow Hill Neighbourhood Forum. I think that this is a much needed body which can represent residents and those who work in Harrow on the Hill.	HA1 3JS
52	<p>I support the setting up of a Neighbourhood Plan for Harrow on the Hill.</p> <p>In particular anything that stops the ruination of the view of Harrow on the Hill from the Northwick Park side.</p> <p>Harrow School should be told to build their new block into the side of the hill at sub ground level. It should be discreet and environmentally friendly. Not an eye sore half way up the slopes.</p>	HA0 3TB
53	<p>I would like to add my support to the above mentioned plan - I have been a resident on the Hill for over 40 years but have loved the Hill for much longer! As a child growing up in a not pleasant part of NW10 I looked to the Hill as iconic - I was taken by my Aunt out to the Hill when I developed a love of poetry - we read Byron's poems by the Peachey Stone and she also took me to Harrow School plays in the Old Speech Room - I loved it - the feeling of history and what a lovely place it was - with amazing vistas over London or out west.....</p> <p>It is a unique area - and needs to be protected as such - and is a well-known landmark. Please let us have a Neighbourhood Plan to help preserve this lovely area for everyone to see and enjoy!</p>	HA2 0JG
54	I have been made aware of the proposal to create a neighbourhood plan for Harrow Hill. I think this is a very good idea and I strongly support it.	Lowlands Road Harrow.

No	Comment	Postcode
55	Please note I strongly support the above plan for Harrow on the Hill.	
56	I would like to express my support for the Neighbourhood Plan being promoted for the area of Harrow of the Hill. The Hill is a historic and valuable part of the borough of Harrow and I think it is important to respect and preserve its unique features and ensure this is taken into account in terms of planning permissions. High quality design for new houses is a must. We must also preserve the integrity and character of the existing houses and shop fronts, keeping special character items such as street lights and also involve and consult with the residents in local matters that concern them such as planning, parking, traffic management, open spaces and ecology etc.	
57	We strongly support the proposal to create a neighbourhood plan for Harrow Hill.	HA1 3AL
58	I am emailing re my support for the neighbourhood plan being proposed as more and more of Harrow has lost its unique personality and attraction.	
59	I support the Neighbourhood plan being promoted for the Area of Harrow –on – the Hill. People come from all over the country and world to look round this well-known area. Do not spoil it PLEASE.	
60	Please note that I support the Neighbourhood Plan being promoted for the Area of Harrow on the Hill.	HA2 0HL
61	I have been made aware of the proposal to create a Neighbourhood Plan for Harrow Hill. I think this is a good idea and I strongly support it.	Lowlands Road
62	I would like our support for the proposed plan to be noted and recorded.	HA2 OHL.
63	As a resident on the Hill for over60 years I warmly support the objectives of the Plan	
64	I'm emailing to express my support for the Neighbourhood Plan for Harrow on the Hill and I believe it is imperative that we have a say in shaping our community.	
65	I support the neighbourhood plan for Harrow on the Hill.	UB6 0LQ
66	I wish to confirm my support for the Neighbourhood Plan being promoted for the area of Harrow on the Hill. This area is an area of natural beauty, peace and heritage, and any development at all should be planned with great thought and care. I have known this area all my life.	HA1 4DJ.



No	Comment	Postcode
67	As a local resident I am a writing to support this initiative.	HA2 0JD
68	<p>I write to support the proposal for a Harrow on the Hill Neighbourhood Plan.</p> <p>My wife and I have lived in Byron Hill Road since 1987 and love the area.</p> <p>We therefore strive to keep it at its peak by retaining all that is good about it and adopting initiatives to make the place even better.</p> <p>To this end we think that actually having a say in what goes on, via communication with neighbours and local representatives, is to be welcomed.</p> <p>This helps to maintain the 'good feel' factor in the area and allows one to play a greater, possibly decisive part, in what's going on.</p> <p>We are very conscious of the need to adhere to local history and architecture, and applaud the work of the Harrow on the Hill Trust.</p> <p>A Neighbourhood Plan, on top of the aforementioned, seems like a very good idea.</p>	HA2 0JD
69	I am emailing to show my support for the Neighbourhood Plan being promoted for the Area of Harrow on the Hill. I love the Hill and do not want Harrow School ruining the views by building unsightly buildings. It is an oasis and should remain so.	
70	Please note that I fully support the Neighbourhood Plan for the area of Harrow on the Hill.	HA5 1DQ
71	As a resident on the Hill for over 60 years, I warmly welcome the objectives of the Plan.	
72	I support the setting up of a neighbourhood forum for Harrow on the Hill	HA1 3JF
73	I would like to pledge my support for the Neighbourhood Plan being promoted for the Area of Harrow on the Hill as i am very concerned about current and proposed developments in this area.	
74	I support the Neighbourhood Plan being promoted for the Area of Harrow on the Hill.	
75	I support implementing a neighbourhood plan for this area. The LPA and their planning Officers do not take any notice of public opinion. This is contrary to the NPPF, but they don't care. Residents need to shape the communities that they live in, not unelected, uncaring bureaucrats!!	
76	This is confirm I support the idea of a Neighbourhood Plan for Harrow	HA1 3EN

No	Comment	Postcode
	on the Hill.	
77	I support the Neighbourhood Plan being promoted for the Area of Harrow on the Hill.	
78	Please note that I support the group that wants to keep the open spaces and protect the views of Harrow Hill and its heritage from further changes.	
79	I really support the setting up of a neighbourhood plan for the area of harrow on the hill and look forward to when it commences.	
80	I have been following with interest the planning disagreements which have erupted in the Borough. It seems to me that if local citizens are so concerned for their environment that they have gone to the lengths of setting up a Neighbourhood Area organisation, then the Council would be well advised to listen to their representations. I heartily approve of their application to set up the Harrow Hill Neighbourhood Forum and I hope you will give them the statutory backing that they need.	N7 8PP
81	I fully support the proposals for the Neighbourhood Area and the Neighbourhood Forum.  I totally agree with the proposed boundary which has been well thought out.  I also wholeheartedly agree with the purpose and role of the proposed Neighbourhood Forum.	HA2 0HR
82	I support the Neighbourhood Plan being promoted for the Area of Harrow on the Hill to  SAVE OUR METROPOLITAN OPEN LAND AND BEAUTIFUL VIEWS!  Please listen to your community.	HA3 8HS
83	I wish to register my support for the Neighbourhood Plan being promoted for the Area of Harrow on the Hill.	
84	I very much support the neighbourhood plan for the harrow on the hill area.  Please do not destroy this area! Everywhere I look there are more and more high rise flats coming up in Harrow.	HA1
85	Having lived in Harrow for nearly 10yrs I came to appreciate the wonderful vista up to Harrow on the hill. This must not be jeopardized by the interests of certain individuals and institutions and a neighbourhood plan giving everyone an equal say must be put in place. Vested interests must not be allowed to prevail!!	

No	Comment	Postcode
86	I support the Neighbourhood Plan being promoted for the Area of Harrow on the Hill.	
87	I support the neighbourhood plan being promoted for the Area of Harrow on the Hill.	
88	As residents of Leigh Court, Harrow on the Hill, we write to support the proposal to create a Neighbourhood Forum for our area.	
89	<p>I write on behalf of the Harrow Architects Forum and would like to support the proposals for Neighbourhood Area Designation as set out in the application made by the Harrow Hill Neighbourhood Forum as published on your website.</p> <p>We endorse the proposed Harrow Hill Neighbourhood Area Map also submitted.</p> <p>We support the application for Neighbourhood Forum status and believe the creation of a Neighbourhood Development Plan can only be good for the residents of Harrow on the Hill and for the borough. The creation of such a body will be a positive ideal for encouraging planning, environmental and social control over one of only a few unspoilt character areas in the borough and should be supported. Such a Forum will enable the people on the Hill to have the chance to shape life on the Hill more than ever before.</p>	HA1 2AW
90	I wish to acknowledge our support for the Harrow on the Hill Master Plan and am happy to be involved with any projects or developments that emerge from this process over the next period of time.	
91	<p>In my view there is a need for broad engagement by Hill residents in relation to a wide variety of changes affecting the Hill. Over the years local bodies - notably the Harrow on the Hill Trust and the more recently formed Harrow on the Hill Forum - have engaged with a range of local issues. The <i>Neighbourhood Planning Regulations 2012</i> provide a legislative framework for such engagement and it is appropriate that this be adopted for the future.</p> <p>The application as submitted provides for an open working body welcoming membership/engagement by any interested Hill resident, whether as an individual or representative of a local organisation.</p> <p>The reality will be that work will be done by a few, as is always the case. However the provision for involvement by any and all interested is there, whether or not residents seize the opportunity is up to them. The public consultation processes outlined in the regulations are unwieldy and must be slow, how workable/effective they will prove in practice remains to be seen.</p> <p>I agree with the Neighbourhood Area and boundary as proposed in the application. In particular, because of the wide distribution of Harrow School (and other school) buildings on the Hill, my view is that the schools falling within the proposed boundary must be included within</p>	HA2 0HZ

No	Comment	Postcode
	<p>the Neighbourhood Area boundary if the Neighbourhood Forum is to have plausibility/meaning. The Hill has been a settlement for more than a thousand years; Harrow School has been an intimately integrated and progressively expanding part of it for 400 years; other schools more recent are also expanding. It is clear both historically and from the 20 year plan promulgated by the council for Harrow School in 2016 that educational institutional developments have not and will not occur in isolation. They will continue to have a major impact on local amenities of direct relevance to Hill residents including but not limited to traffic/roads and public transport. It is also evident from input by local residents' into successive planning applications that the schools are seen as having a major impact on the Hill's designated status as an Area of Special Character/Conservation Area with the benefits and limitations those designations carry.</p> <p>So the schools must be included within the Neighbourhood Area boundary as proposed. Some may well decline membership/active engagement with the processes of a Hill Neighbourhood Forum on the basis that potentially enabling local residents to have a more effective say in their development proposals will not likely serve their particular interests. Whether or not to take up and actively exercise Forum membership is a choice for any local resident or entity. Declining membership cannot however be a justification for self-exclusion from a proposed boundary if that boundary is judged as meaningful for the community in which the entity functions. Allowing self-exclusion from the boundary in such circumstances is to grant a veto to any large/powerful community entity and to subvert the manifest intent of the regulations.</p> <p>I agree with the proposed purpose and role of the Neighbourhood Forum. They must be broadly stated because the potential issues impacting on any community are broad as reflected by the numerous council Development Management (DM) policies of potential relevance listed in Document 2 in support of the application, with the additional specific considerations for the Hill as an Area of Special Character/Conservation Area.</p>	
92	<p>I have reviewed the documents supplied in relation to the establishment of the Harrow Hill Neighbourhood Area / Neighbourhood Plan and I support this proposal wholeheartedly. The designated area accurately represents what is usually referred to as Harrow on the Hill, which is a unique area within the bigger Harrow area. As such the plan for this area might require different considerations as opposed to the ones for the rest of Harrow. Being a resident of Harrow on the Hill I also support the establishment of the neighbourhood residents forum which creates a neighbourhood plan to meet the demand wishes of the residents.</p>	HA1 3NY
93	<p>I am a long term resident of Harrow on the Hill, having lived on the hill for over 15 years. I currently reside in Mount Park Road and previously lived on Crown Street. I have read the application to designate Harrow Hill Neighbourhood Area and Neighbourhood Forum and they have my full support. I believe it is important for local</p>	HA1 3JP

No	Comment	Postcode
	<p>residents to have a voice regarding planning decisions. I also believe that the boundaries suggested are appropriate. Harrow on the Hill is such a unique and special area, I believe that having greater input from residents will allow us to preserve the wonderful character whilst supporting sympathetic development in the area.</p>	
94	<p>I am writing to you to support the Harrow Hill Neighbourhood Plan. I believe that this democratic involvement will benefit all the residents and businesses on the Hill and the wider community.</p>	HA2 0JH
95	<p>I fully support the formation of the Harrow Hill Neighbourhood Forum and the designation of the Harrow Hill Neighbourhood Area.</p> <p>There is a need for a closer relationship between the council and the residents and also to allow local people a voice about the future of the area they live in.</p> <p>The argument of the inclusion of the areas outside of the existing conservation area such as Lowlands Recreation Ground are sound ones as they will undoubtedly impact on the conservation area at least in terms of views.</p>	
96	<p>The Elm Park Residents' Association wishes to heartily support the application by the proposed Harrow Hill Neighbourhood Area Forum to be not only approved but very much supported by Harrow Council.</p> <p>With over stretched budgets and workforce alike, Harrow Council is, in our opinion, much in need of such enterprising groups to push forward the interests of their neighbourhoods.</p> <p>We in Stanmore value the exceptional views to and from this landmark area and hope the Harrow Hill Neighbourhood Area Forum will continue to promote and protect this incredible asset - we wish them well in their endeavours.</p>	HA7 4AU
97	<p>I am writing to express my support for this initiative. The proposed area is sensible, I welcome the opportunity for our community to be involved in the development of our area.</p>	HA1 3JW
98	<p>I think that the Harrow on the Hill planning area is an excellent idea...as long as it doesn't make the conservation area rules any stricter. they are impossibly harsh at the moment and yet Harrow School is about to build an enormous eye sore which will blight the hill for years to come.</p>	Ha2 0Jz
99	<p>This is an excellent plan.</p> <p>We agree with the proposed Neighbourhood area and boundary.</p> <p>We agree with the purpose and role of the proposed neighbourhood forum.</p>	HA1 3JW
100	<p>As a local resident within this Neighbourhood Area, I fully approve of the application and hope that it will contribute to the improvement of</p>	HA1 3ED

<b>No</b>	<b>Comment</b>	<b>Postcode</b>
	the Hill and its surrounds. The Council should actively encourage this proposal and facilitate the introduction of the Forum and the planning process.	

## **5 responses supportive of the forum and area, but sought an extension of the area**

### **1. (Individual)**

I live at <redacted> Roxborough Avenue, postcode HA1 3BT and noticed the side of Roxborough Avenue, which includes my property, as well as my neighbours (row of Edwardian houses) and the town houses on the other side, have been excluded. It also excludes the newly developed Roxborough House block of apartments, (Old Jato building).

Would it be possible to include the whole of Roxborough Avenue in the proposed area. If there is a valid reason for the exclusion, could you please let me know what it is.

From a community point of view and shared interests, excluding this section of Roxborough Ave means that the Roxborough Residents Association would be split as it covers all of Roxborough Park and Roxborough Avenue.

### **2. (Individual)**

I am very concerned to learn that the northern side of Roxborough Avenue has been excluded from the proposed area map. It would appear that all the our Edwardian houses, the townhouses plus Hobart Court on that side of the road are outside of the plan. Also the new residential block at the end of the Avenue – Roxborough House, has also been excluded.

By excluding this section of Roxborough Ave it would mean that the Roxborough Residents Association would be split as it covers all of Roxborough Park and Roxborough Avenue. Obviously, we would very much like it, if the whole of Roxborough Avenue was included in the proposed area. It also doesn't make sense to exclude part of this road from the area plan. Therefore, we would appreciate it if this could be amended to include all of Roxborough Avenue.

Please could you therefore include us in the plan.

### **3. (Individual)**

I would like to comment on this plan as follows:

I think the idea of a Plan is a good idea and in general support it.

However, I don't think proper consolation has been given to the areas included in the Plan. I was very disappointed to find that it excludes the northern side of Roxborough Ave and other areas around the Hill which in my view should be included.

Therefore, I would request that Roxborough Ave is included or that the Plan is sent back to the committee for review.

Apart from excluding such areas as the northern side of Roxborough Ave it will split the area covered by the Roxborough Resident Association which is an active residents association covering both Roxborough Park and Roxborough Ave.

#### **4. (Individual)**

Further to the above. We live in an Edwardian house on the north side of Roxborough Avenue and wonder why our houses, Hobart Court and the townhouses also on the north side of Roxborough Avenue have been excluded from the Neighbourhood Area Forum proposal. In addition the new residential block under construction at the end of Roxborough Avenue on the south side (formally the site of Jato's offices) has also been excluded. We are extremely concerned by the aforementioned omission.

As members of the Roxborough Residents' Association for over 25 years, we feel to split the area covered by the Association does not make sense. It would be very much appreciated if the whole of Roxborough Avenue (both the north and south sides) could be included in an amended area plan, together with all of Roxborough Park, as both Roxborough Avenue and Roxborough Park are part of the Roxborough Residents' Association.

#### **5. (Individual)**

As a harrow resident, I would just like to submit my support for the application submitted for the creation of Harrow on the Hill Neighbourhood Forum and Area.

In addition I would love to see a slight extension to the boundary further south of the private road of South Hill Avenue / Mount Park, to end at the start of Brooke Avenue. 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.

Please let me know if I need to submit any further details to show my support for the application submitted.



**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)**

## **1. National Grid**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

### *About National Grid*

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operates the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

### *Specific Comments*

An assessment has been carried out with respect to National Grid's 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.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

### *Key resources / contacts*

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The electricity distribution operator in London Borough of Harrow Council is UK Power Networks. Information regarding the transmission and distribution network can be found at: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

[names and addresses provided]

## **2. Natural England**

Thank you for your email dated and received on 31st October 2017 notifying Natural England of your Neighbourhood Planning Area.

We would like to take this opportunity to provide you with information sources you may wish to use in developing your plan, and to highlight some of the potential environmental risks and opportunities that neighbourhood plans may present. We have set this out in the annex to this letter.

### *Natural England's role*

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Your local planning authority should be able to advise you when we should be consulted further on your neighbourhood plan.

### *Planning policy for the natural environment*

Neighbourhood plans present significant opportunities, but also potential risks, for the natural environment. Your proposals should be in line with the National Planning Policy Framework. The key principles are set out in paragraph 109:

The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

You should also consider the natural environment policies in your area's Local Plan. Your neighbourhood plan should be consistent with these, and you may decide that your plan should provide more detail as to how some of these policies apply or are interpreted locally.

The attached annex sets out sources of environmental information and some natural environment issues you may wish to consider as you develop your neighbourhood plan.

### **3. Highways England**

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with 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.

After looking through the documents you have provided, we have no further comments to make as the current consultation is just concerning designation of the neighbourhood area and forum, therefore there is no potential impact on the SRN.

### **4. Historic England**

The Government, through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012), has enabled local communities to take a more proactive role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, to be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest is affected by the Plan. As Historic England's remit is to advise on proposals affecting the historic environment our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets.

The area covered by the proposed Neighbourhood Plan includes eight conservation areas and numerous listed buildings, some highly graded. We note that the area may also include locally listed buildings has archaeological interest.

#### *Proposed Boundaries*

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. The reason given for excluding this part is that it falls within the Area of Intensification identified in the Harrow and Wealdstone Action Plan. Historic England generally advises that boundaries reflect or encompass the conservation area boundary, ensuring that the conservation area policies are operated in a consistent manner. This is not a matter we wish to comment on further; however, it will be advisable to discuss with the Council if the significance of the conservation area could be affected.

#### *General Advice*

As part of the neighbourhood planning process, Historic England is keen to encourage a review of the local evidence base and the inclusion of policies that promote the positive management of heritage assets. In developing a robust

evidence base, upon which to develop policies that sustain and enhance positive elements of local character and their settings, we would encourage the Neighbourhood Forum to identify areas and topics that require updating or further analysis.

We suggest consulting the Greater London Archaeological Advisory Service (GLAAS) who can provide information from the Greater London Historic Environment Record. This includes information relating to the archaeological interest of the area. Further advice on techniques for identifying and managing character and heritage assets is available on Historic England's website. This includes links to: 'Local Heritage Listing'<sup>1</sup>, 'Understanding Place: Historic Area Assessments'<sup>2</sup> and 'The Setting of Heritage Assets'.<sup>3</sup>

In the event of agreement to designate the Neighbourhood Forum and the proposed boundary we would be happy to comment further on the developing plan. If you wish to discuss any of the above observations please do not hesitate to contact us. Finally, I must note that this opinion is based on the information provided by you and, for the avoidance of doubt, does not take precedence over our obligation to advise you on, and potentially object to development proposals which may subsequently arise from the eventual Neighbourhood Plan and which may have adverse effects on the environment.

*Footnotes:*

- 1 Local Heritage Listing is available at: <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>
- 2 Understanding Place: Historic Area Assessments is available at: <https://historicengland.org.uk/advice/planning/understanding-historic-places/>
- 3 The Setting of Heritage Assets is available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

## **5. Transport for London**

Thank you for consulting TfL for our view on the 'Harrow Hill' community group's application to set the boundary of a neighbourhood area and to be formally designated as a neighbourhood forum. The consultation summary requests that representations be confined to the appropriateness of the area and its boundary.

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. This is quite surprising 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). However, quite clearly 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.

TfL has no other comments.

### **3 responses objected to their names being included on the list of Forum members and the process upon which the applications had been made**

#### **1. Danny Beckley (Head of Estates and Grounds, Harrow School)**

Harrow School has received from the Council the application in your name with named members of the Forum listed in relation to a potential Harrow Hill Neighbourhood Plan. The School has been invited to comment on the application for the neighbourhood forum to be formally designated. I am most surprised that I had no knowledge or warning from you or anyone that this application had been made and that public consultation was to be carried out this month. I certainly did not realise that the documentation previously circulated by you by email was going forward into a formal application. Had I been informed that an application was being made in that form, I would have consulted the School and taken advice. I would certainly not have agreed to my name being on the list of Forum members impliedly in support of the application in its current form.

As you know, I attended as an observer a single meeting in 2016 called by you where the possibility of making such an application was discussed. As far as I am aware no subsequent meeting has been held and no discussion has taken place at a meeting of the proposed draft constitution or proposed area. I have no idea what other persons have said or might say in a meeting if one had been held. I did receive emails from you but never understood that an application was imminent or in what form. As far as I am aware, there has never been any formal discussion or agreement of who would be chairman, who might be officers, who the named supporters were (the first time I saw the list of named members was this week), or what the form of the application was.

Whether or not any such discussion did take place in my absence, I have now been able to consult the School and have taken advice. There is no way in which I or the School can support the constitution as drafted, nor can I or the School agree to the area proposed to be included in the application. In such circumstances I ask that my name be forthwith taken off the list of current and potential future Forum members, that it be made clear by you to the Council that neither I nor the School are in support of the application and that neither I or the School can be regarded as potential members of any Forum in the future which associates itself with the area and constitution as drafted. I also ask that this is made clear by you to all those who are being consulted on the current application. Those being consulted must wrongly and misleadingly believe that the School is in favour of the application. This undermines the validity of the whole consultation process.

As you know and would expect, I am no expert on these matters and I must consult with others and take advice before agreeing to any formal position being taken in the School's name. I do realise that you did circulate documents in October 2016 including to me and I should perhaps have made it clear at the time that I did not wish my name or that of Harrow School's to go any application document. However, I am surprised that if you wished to make a formal application you did not give proper and clear notice of this to me beforehand. I cannot speak for others, but I assume that other members on the list are in the same position as me. Before it was made, you did not call a meeting of at least those whose names would be on the application

to agree to the form of the application and to their names being on it. I am most disappointed that this was not done as I could and would have consulted with others, taken advice and have made my and the School's position clear to you and others in writing then before an application was made, not during the consultation period afterwards.

## **2. Michael Gibson (Bursar, John Lyon)**

The John Lyon School has been made aware by Harrow Council that an application in your name in connection with the above was lodged with them on 20 September 2017. I note that my name appears as one of the members of the Forum. I was unaware and had no information from you or anyone that this application was, or had been, made and that public consultation was to be carried out this month. I also was not aware that the documentation previously circulated by you by email was being taken forward into a formal application. Had I known this, I would have taken advice and consulted School Governors prior to my name being submitted to the Council on the application as it is currently laid out.

The School has now been asked to comment on the HHNF application. As you know, I attended the initial meeting as an observer in St Dominic's on 9 May 2016 where the idea of setting up a neighbourhood plan was initially discussed. I am not aware that any further meeting was convened and I have not been afforded the opportunity to comment on the proposed area defined by the plan or on the application itself. It would have been helpful to join this debate and meet with like-minded and interested parties so as to understand the plan's objectives and intentions.

Having studied the proposed constitution I regret to say that the School cannot support it in its present form. I therefore request that my name be removed from the list of current members in the application. I would also ask that you make it clear to the Council, and other members listed in the application, that that the School are not in support of the HHNF in its current form and constitution drafting.

Finally, on a personal note, I am surprised that you chose not to inform me that the application was being submitted. I am no expert on these matters and would be expected to consult with School Governors and others prior to my name going forward as a representative of The John Lyon School. I should have received sufficient time to brief Governors and for them to make an informed decision before my name, as the School representative, was included on the application. The School shall be making a formal representation to the Council in due course.

## **3. Ted Allett**

I attended the meeting at St Dominic's School in May 2016, to discuss a proposal for establishing a Neighbourhood Forum. At that meeting, I volunteered in a personal capacity to help with the proposal.

On 15 October 2016, you distributed a draft constitution for the proposed Forum.

In September, you submitted applications to designate a Harrow Hill Neighbourhood Area and Forum with yourself as Chairman-Designate, without having convened a meeting of the proposed Forum or having notified volunteer members of the said Forum, of either your intention to do so or that you had done so.

I do not wish to be a member of a Forum run on such lines, so please accept this letter as my resignation from any resulting Neighbourhood Forum.

## **7 responses (5 individuals and 2 community groups) objected to the neighbourhood forum**

### **1. (Individual)**

This sounds divisive to me. Creates a sense of Harrow Hill being separate from the rest of Harrow. After their failed plan to make areas into car parks instead of amenities for all I feel there is an attempt to be exclusive.

### **2. (Individual)**

I write to express my concern about this group. I 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.

I therefore request that the Council strongly rejects the idea of the Harrow Hill Neighbourhood Forum.

### **3. (Individual)**

I am opposed to the application for a Harrow Hill Neighbourhood Area and Forum. I do not agree with the purpose of the forum which I believe to have been proposed by people with their own agenda. There are already means for consultation on planning matters.

### **4. (Individual)**

I recently received a letter regarding the consultation for a neighbourhood forum. Apologies for my delay in response but I was so confused when I received this letter that I had to do a lot of research.

I am seriously concerned about this group. I am unsure how a team of self-selected members have become part of this, I have also heard that some of those members listed don't want to be part of it and were shocked to see their names on the list when I asked them what they were involved in such a thing without mentioning it to anybody and what qualified them for this particular role to make decisions on my behalf. This team certainly do not speak for me and I very much reject the idea of this group being allowed to proceed. If the community has that little faith in the Council on making decent planning decisions they should at the very least give residents the same playing field on if they want to be part of neighbourhood plan. I know with ten years in construction, working on the Olympic bid, setting up a village community market and volunteering for local activities you think I may have heard something about it, but not a thing.

I would personally like to see a full CV of every single one of these members, I would personally like to interview each one before allowing them to speak on my behalf.



This same group of people make life in the village so miserable. They constantly complain, pulled the Trust apart with their fierce negativity and interference and barely support any community initiatives outside of their own objectives. I have had people knocking at my door campaigning against planning without clear facts. It is very frustrating.

Please acknowledge this e-mail as a rejection of this group. I will genuinely move out of Harrow to escape these people if it is allowed to proceed.

## **5. Harrow Hill Forum**

The Harrow on the Hill Forum ('This' Forum) was established by the Council in 1989, and is a recognised local organisation with nominated Councillor representatives. This Forum met with Paul Catherall in May 2016 to discuss the idea of a Neighbourhood Area/ Plan/Forum for the Hill. It also met on 23 November this year to consider its response to the Council's consultation on the application now made.

This Forum supports the concept of a Neighbourhood Forum being established (broadly covering the Area of Special Character) under the relatively new legislation that bestows powers to develop a statutory plan for the Area.

Indeed, at the meeting in May 2016, This Forum offered that were a Neighbourhood Forum to be set up, it would be prepared to "migrate" into it, i.e. its members would all agree to become members of the new Forum. The intention was that This Forum would then be dissolved, as it was felt that it would be confusing and unnecessary to have two Forums on the Hill (in addition to the long-established Harrow Hill Trust).

Sadly, that offer has not been taken up. Several members of This Forum did attend the Open Meeting at St. Dominic's School, also in May 2016, and had personally volunteered to play a part in developing the idea of a Neighbourhood Forum. However, this Forum is concerned by the lack of communication in the subsequent 18 months; more specifically:

- Volunteers were consulted on a draft Constitution in Autumn 2016, but the five volunteers attending the recent meeting of This Forum were unaware of any other consultation on or notification of the application.
- The Chair of This Forum had volunteered in a personal capacity but is listed in the application as representing This Forum. (Several other members of this Forum had similarly volunteered in a personal capacity but were listed as representing organisations.) This Forum was never asked to nominate a representative on the Neighbourhood Forum.
- The Chair of the Harrow Hill Trust confirmed that the Trust had not asked or been asked to be represented on the Neighbourhood Forum, but Debora Catherall is listed as representing the Trust.
- In the absence of any known consultation or meeting, the 'Chairman Designate' (Paul Catherall) is presumably self-appointed.

We also noted that it seems that none of the three churches represented on This Forum had been invited to be members of the proposed Forum.

A second major concern with the application is that it is not supported by Harrow School. Their representative on This Forum informed our meeting by email that, whilst reaffirming the School's support for This Forum, they had strong reservations about the Harrow Hill Neighbourhood Forum proposals.

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.

In conclusion, 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.

## **6. (Individual)**

*1<sup>st</sup> email:*

I write to you to inform you that I am very much in favour of the Harrow Hill Neighbourhood Area and Neighbourhood Forum.

*2<sup>nd</sup> email*

Further to my last email dated 10/12/17, I now revoke my previously given approval to the above Forum.

I now object to the above on the basis that :-

1. The Forum Committee will not be known to the general public.
2. The above-mentioned Forum can be 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.

I therefore strongly object to the formation of the Forum

*3<sup>rd</sup> email*

I write to object to the above Forum.

Having read the Constitution of the Forum, it states that the Forum Committee will not be disclosed to the general public.

The Forum has the potential to be dissolved in five years, with all funds, assets and powers passing to one or more affiliate members, of which, the identity will remain unknown.

There is also 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.

The application states that all necessary funds will be raised by the applicant, which potentially changes the planning process, for Hill residents, from tax-payer funded to privately funded.

## **7. Hatch End Association**

The Hatch End Association appreciates the information you have provided us on the Harrow on the Hill application for a Neighbourhood Forum for local development and planning. We had not been made aware of this Forum by the Council Officers and it is very pertinent to local democracy and the expression of local interest in the development of each community area in the Borough.

The UDP sets the framework for planning and development within the Borough. This defines how Harrow sees itself development and setting strategic policies and constraints on future development in order to maintain a consistent borough wide approach.

A neighbourhood forum gives legitimacy to local opinion and, provided it remains consistent with the Harrow Council UDP) could help in the following ways:

- Contribute to the UDP with specific requirements for the area.
- Bring forward with local support small scale developments within the neighbourhood scheme for housing development or reuse of land.
- Represent and protect areas that are special to the local community such as parkland, green belt, rights of way and conservation areas.
- Encourage local participation within planning proposals within the area.
- An active Forum with continuing local support within the community would be an excellent vehicle for achieving these objectives.

However, we do also have some potential concerns on governance requirements for a Neighbourhood Forum.

- We note the Forum is comprised of 21 elected persons to represent the community. The Executive Committee is 5 to 14 people, so the minimum quorum would be 3. This could lead to a minority taking control of local policy to the detriment of the broader community. We feel there should be governance protections against this to ensure unrepresentative voices do not claim to speak for the community as a whole.
- There is very little information on the costs and financing of the Forum. Organisations like the Hatch End Association have a very small levy across many households to meet our operating needs. This also gives us legitimacy within the community. Any Forum would need a broad base of subscriptions to enable the work they do. Although their operating costs may be low (like ours)

funding should come primarily from the community rather than other sources such as local business sponsorship.

- Any neighbourhood forum needs to be for the long term; to assimilate local needs and concerns and take these forward over time. We know how hard it is to maintain community support over time and it is only possible for the Hatch End Association to do this with our many committed Road Stewards to liaise with individual household and to collect subscriptions. The Harrow on the Hill neighbourhood Forum must set up structures and local commitment to provide continuity (and learning) over many years. Initial enthusiasm at local referenda can give impetus but subsequent disengagement can lead to minority interests being represented.

If these concerns can be addressed, and with the active support (and possible power of veto) of the Harrow Council to work with the neighbourhood Forum community as part of the UDP and local planning process, we would support the formation of the Harrow on the Hill neighbourhood Forum.

## **8. (Individual)**

- The proposal is to include the (major part of) several Conservation Areas and Area of Special Character on and around the Hill, largely to give them greater protection than they have at present
- In essence the proposal has been welcomed by people who believe it presents an opportunity to have a greater say and to obtain more control over what happens in this area
- I think the proposed Neighbourhood Area as shown on the map submitted with the application identifies this and I accept it
- I am not sure about the purpose and role of the Neighbourhood Forum as I feel I do not know enough about it - although I have been making some enquiries and hope to continue to do so
- I think there has been insufficient Public Consultation on the whole: I attended the meeting at St Dominic's held in May 2016. People were invited to give their views on the proposal and these were written on charts. I cannot trace that these comments have been distributed to those who attended the meeting - I cannot find such advice. Nor that there have been any more public meetings held in the period
- I also note that in the documents submitted to you (Nos. 1 and 2) reference is made on several occasions to various entities - might be called "interested parties" for want of a better description - from whom it seems support is presumed. Although again I cannot trace written confirmation of this given within the period ended 31st October 2017 when the consultation commenced. Again, I need to carry out more research to trace this.
- Only one School Governor represented on the Forum (as an associate member)

## **1 response requested revisions or removal from the proposed area, as well as objecting to the validity of the two applications overall.**

### **1. Harrow School**

This is Harrow School's response to the application made by Mr Paul Catherall to the London Borough of Harrow ostensibly on behalf of the Harrow Hill Neighbourhood Forum (HHNF). Due to the significance of the application and the issues it raises, the School<sup>1</sup> instructed senior planning counsel who has settled this response to the consultation on the following:

- A) To designate the area shown on the map included in Document 1 of the application as the Neighbourhood Area.
- B) For the HHNF to be designated a Neighbourhood Forum under the Neighbourhood Planning (General) Regulations 2012 as set out in Document 2 of the application.

#### *Summary of Harrow School's Position*

Harrow School objects to both A and B above; namely to the designation of the proposed area as the Neighbourhood Area and to the designation of the Neighbourhood Forum under the Act and Regulations.

Before the application was made the School by its representative Mr Daniel Beckley attended an open meeting in May 2016 called by the applicant concerning the concept of a Neighbourhood Plan. He attended two further meetings which discussed the concept. The School at no time gave its consent to the application, the draft constitution or to the proposed Neighbourhood Area. The first time that it had knowledge that an application had been made was when it received notification of this from the Council dated 1st November 2017. Mr Beckley wrote to the applicant on 7th November 2017 making it clear that neither he nor the School supported the application and was not willing to be stated to be a member of the Neighbourhood Forum on the application, requesting that this be notified by the applicant to others. The letter sent to applicant dated 7th November 2017 contains further details of Harrow School's position. A copy is attached together with a copy of the applicant's reply.

#### *Law and Policy*

In reaching our conclusions and formulating our response, the School took into account the following issues of law and policy which will no doubt be well known to the Council.

Both a Neighbourhood Plan and a Neighbourhood Development Order are capable of affecting the economic, social and environmental character of the designated Neighbourhood Area as well as the lives of those who live and work within it. A Neighbourhood Plan is a material consideration to be taken into account when planning decisions are made by the Local Planning Authority especially with respect

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<sup>1</sup> And its Keepers and Governors

to development in such an area. Parliament therefore requires strict conditions to be met before those persons who would control a Neighbourhood Forum are given powers to formulate a Neighbourhood Area, Neighbourhood Plan and Neighbourhood Development Orders. It is noted that the control over such matters is vested in the Local Planning Authority who must as a matter of law scrutinise carefully and fully any application to designate a Neighbourhood Area and Neighbourhood Forum.

It is further noted that the following matters and provisions apply in such a case:

Section 61F of the Town and Country Planning Act 1990 (inserted by the Localism Act 2011) requires that a prerequisite of designation is that the Local Planning Authority must be satisfied that all stated conditions are met. If any are not met, there is no power or discretion for the Local Planning Authority to designate the Forum.

Section 61G(5) of the 1990 Act requires the Local Planning Authority in determining an application for a Neighbourhood Area to consider whether the area is appropriate. This would include taking into account the effect on the proper planning of the area having regard to the Development Plan and any relevant adopted Supplementary Planning Guidance.

The Local Planning Authority has a broad discretion when considering an application to designate a Neighbourhood Area. As made clear by the Court of Appeal, if a local authority has regard to the factual and policy matrix applying at the time the decision is made, including in particular the Development Plan and other relevant policies [here this includes the NPPF, the Harrow Local Plan and the Harrow School SPD], its decision is beyond challenge – see *Daws Hill Neighbourhood Forum v Wycombe District Council* [2014] EWCA Civ 228, a decision of the Court of Appeal.

Government Guidance – DCLG “Neighbourhood Planning” – states that 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 para 16 NPPF) – see para 004 Ref ID 41-004-20170728. A Neighbourhood Plan therefore cannot be a device to detract from, counter or undermine the policies found in the Local Plan or in an SPD.

#### *Grounds of Objection*

A) *To designate the area shown on the map included in Document 1 of the application as the Neighbourhood Area.*

1. Regulation 5(1)(c) of the Neighbourhood Planning (General) Regulations 2012 requires that an application for a Neighbourhood Area must include a statement from the applicant explaining why the proposed area is considered appropriate to be designated as a neighbourhood area. The statement accompanying the application is wholly inadequate for the reasons set out below.
2. A substantial proportion of the area sought to be designated as the Neighbourhood Area (about 40%) is exclusively owned and occupied by Harrow School. The School is a strong objector to the Neighbourhood Area

boundary as set out in the application. As the Council is aware, there is already prescribed local planning guidance applying to the School estate as set out in the recently adopted (July 2015) Harrow School Supplementary Planning Document (SPD). The SPD should, in accordance with government policy in NPPF, be given significant weight as supplementary guidance to the Local Plan, the statutory Development Plan for its area.

3. The purpose of the SPD is to guide development within its area, having regard to Local Plan policy. It includes significant and important proposals for enhancement of the land within its area. Adoption of the SPD followed full and wide public consultation with local residents, businesses, and all other relevant bodies and organisations including the Greater London Authority, Historic England and other statutory consultees. Designation of the proposed Neighbourhood Area, which would overlap the majority of the SPD area, would undermine the purpose of the SPD. This clearly should be avoided in the interests of the proper planning of the Council's area. The only way to avoid the proposed Neighbourhood Plan being in potential conflict with the SPD would be to exclude the Harrow School SPD area from the Neighbourhood Area.
4. Section 61F(7)(a)(ii) of the 1990 Act requires that when determining whether to designate a Neighbourhood Forum the Local Planning Authority has 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. This is clearly not the case here and the postcodes of the members listed do not reflect a proper geographical spread of the proposed neighbourhood area (see map attached). Whilst there is a concentration of members to the west of the High Street there is very limited representation of residents, businesses and other organisations elsewhere, particularly at the southern and northern ends of the proposed area. The eastern part of the area is largely in the ownership of Harrow School who is unwilling to join the Forum. Further, as the criteria in Section 61F(7)(a)(ii) cannot reasonably be met if the School estate is included, it should be excluded from the Neighbourhood Area.
5. The proposed Forum is comprised of membership which is not representative of the community at large and the application fails to demonstrate an understanding of the demographic profile of the area. The area does not include membership from characteristic groups. In short, the application for the designation of the Neighbourhood Area fails to draw membership of the Forum from different sections of the community within that area. It should be significantly reduced at least to exclude the School's estate and other areas not represented.
6. The public engagement carried out by the applicant in respect of defining the extent and location of the Neighbourhood Area boundaries, including their appropriateness, is wholly inadequate. Despite attending two meetings and receiving correspondence from the applicant the School was not informed by the applicant of the making of the application. Had it been properly consulted, it would have objected to the inclusion of its estate and the area of the Harrow School SPD in the proposed Neighbourhood Area and would have wished to

have engaged in further dialogue concerning the appropriate boundaries of the Neighbourhood Area.

7. The School is not aware of any evidence that residents or businesses beyond but adjacent to the proposed boundaries were consulted on the proposed Neighbourhood Area boundary proposals and specifically as to whether they considered themselves to be a part of a distinct neighbourhood area and/or wished to be inside (or outside) the proposed area.
8. In an area of approximately 4,600 households, the Forum seems to have fewer than 25 members, as indicated by the application papers. There is no evidence that the residents, businesses, organisations and employees in the proposed Neighbourhood Area have been properly consulted. It cannot therefore be concluded on evidence that the proposed area is appropriate based on democratic support. The legislation requires this as a prerequisite.

*B) For the HHNF to be designated a Neighbourhood Forum under the Neighbourhood Planning (General) Regulations 2012 as set out in Document 2 of the application.*

1. The Neighbourhood Forum is not representative of the residents and businesses located within the Harrow Hill area. It has not been properly constituted and the applicant has not carried out adequate or proper consultation. In the circumstances any designation of the Neighbourhood Forum under the Act and Regulations as is proposed in the application would be wrong in law. Public engagement has been limited to one leaflet mail out, one public meeting in 2016, a stall at May Day 2016 and 2017 on the Hill, and undocumented meetings with some local organisations who are not affiliated with the Forum. Residents, businesses and organisations located in the area must be properly consulted before the application can have any validity. As the Council cannot be satisfied of this, there is no power for it to approve the application.
2. The applicant, Mr Paul Catherall, is self-appointed as chairman and has not been properly elected as chairman of the Neighbourhood Forum in this application nor has he any elected power to act on behalf of the Neighbourhood Forum in making such application. The application is for this reason invalid too.
3. There is no evidence that all the persons stated to be members of the Neighbourhood Forum have agreed to be named members or to their names being included in the list of supporters of the application. In fact, the contrary is true as the list comprises objectors to the application, including Mr Daniel Beckley, who is stated to be a supporting member of the Forum on behalf of Harrow School. Neither he nor Harrow School has agreed to support the application nor agreed to his name being placed on such a list. This is also understood to be the case with others including Michael Gibson from John Lyon School and Ted Allett of the Harrow Hill Forum. The School objects to the application on this ground, too, and without a minimum of 21 named members of the Forum, the application is invalid and not in accordance with section 61F(5)(c) of the 1990 Act. There is in such circumstances no power for the Council to approve the application.



4. The constitution of the proposed Neighbourhood Forum is totally unacceptable. It is drafted in such a way that very few persons on an executive committee, a minimum of five persons with a quorum of three, would be able to exercise significant if not total control over the Forum's planning and other decisions concerning the Neighbourhood Area<sup>2</sup>. In the draft constitution the chairman is accorded the casting vote at any executive committee or Forum general meeting which would give the chairman and a very small number of persons acting with him control over all activities and decisions the Forum may make. This is unacceptable and can lead to undemocratic decision making.
5. The executive committee is stated to be able to co-opt unelected members of their choice onto the committee<sup>3</sup>, including persons with no local knowledge or understanding of the area, who would have the same voting rights as any elected members and could also be elected as an officer by the committee. As there would be no need for them to stand for election, they cannot be required by the membership to stand down. This is unacceptable and unconstitutional.
6. The executive committee would be able to determine policies in relation to expenses, including awarding themselves expenses. If a small unrepresentative body as is proposed, this would be unacceptable.
7. The Forum membership would be unrepresentative. Membership is to be given to residents and businesses operating in the Neighbourhood Area, whatever the size of the business or the area each 'representative' holds within the Neighbourhood Area. Therefore only one vote at general meetings would be given to Harrow School – evidently the largest employer and land-owner in the area - the same voting rights being given to each business of whatever size and number of employees. This is clearly not in accordance with the spirit or the intent of the Localism Act 2011 which gave rise to Neighbourhood Plans and Forums. This is unacceptable.
8. One result of adoption of the draft constitution would be the undermining of the Harrow School SPD and decisions which are made by the elected members of the Local Planning Authority in accordance with such adopted guidance. This should be resisted by the Council.
9. The proposed Forum states that its current members, through involvement with other local community groups, will have "significant reach to a very large number of residents". There is no evidence of this and in an area of approximately 4,600 households in the proposed Neighbourhood Area (this figure is obtained by interrogation of GIS data) the Forum has it seems fewer than 25 members, as indicated by the application papers, which cannot lawfully be concluded to be representative of even a small part of the area.

Enclosures:

1. Letter dated 7th November 2017 from D Beckley to the applicant [see above];

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<sup>2</sup> Document 2 Appendix 1 page 6 Paras 13, 15 and 16

<sup>3</sup> Document 2 Appendix 1 page 6 Paras 15 Paras 19

2. Reply from applicant to D Beckley's letter 7th November 2017
3. Map of area showing location of residences of named members of proposed Forum

