

# REPORT FOR: CABINET

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<b>Date of Meeting:</b>	20 June 2012
<b>Subject:</b>	Pre-Submission Development Management Policies DPD
<b>Key Decision:</b>	Yes [affects All Wards]
<b>Responsible Officer:</b>	Andrew Trehern, Corporate Director Place Shaping
<b>Portfolio Holder:</b>	Councillor Keith Ferry, Portfolio Holder for Planning and Regeneration
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	No
<b>Enclosures:</b>	Schedule 1 - Responses Development Management Policies DPD  <i>[Due to the size of the DPD, it has been circulated to Cabinet Members, the Leader and Deputy Leader of the Conservative Group and key officer(s) only. A hard copy has been placed in the Members' Library. The document has been published with the agenda and can be viewed on the website.]</i>

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

This report summarises the changes that have been made to the Development Management Policies DPD to prepare it for pre-submission consultation and submission to the Planning Inspectorate for Examination in Public.

### **Recommendations:**

Cabinet is requested to recommend that Full Council:

1. Agree the Development Management Policies DPD for pre-submission consultation; and
2. Agree that the Portfolio Holder may approve any changes to the Development Management Policies DPD that are required, in response to the pre-submission consultation, prior to submission to the Planning Inspectorate for Examination in Public.

### **Reason: (For recommendation)**

To progress production of the Development Management Policies DPD in accordance with the adopted Local Development Scheme.

## **Section 2 – Report**

### **A. Introduction**

1. Harrow's Core Strategy was adopted on 16<sup>th</sup> February and comprises a spatial strategy for development to 2026 complimented by strategic planning policies covering thematic and neighbourhood issues. The London Plan (2011) also forms part of the development plan for Harrow and contains a comprehensive suite of 'planning decisions' policies on matters of relevance across the capital. For local development management policies, however, Harrow continues to rely on the saved provisions of the Unitary Development Plan (2004).

2. It is a corporate priority to prepare a new Development Management Policies development plan document (DPD), alongside other DPDs, to give effect to and support the Core Strategy. A draft suite of 'preferred option' development management policies was published for consultation during May and June last year, and the outcome of this consultation was reported to the LDF Panel on 19<sup>th</sup> July 2011. The focus of the LDF team during the second half of the year was the Core Strategy Examination in Public.

2. Annex 1 of the recently published National Planning Policy Framework (NPPF) gives 12 months for decision takers to give full weight to existing development plan policies beyond which they should be given due weight according to their consistency with the NPPF. In view of this deadline, and the age of the Harrow Unitary Development Plan, there is now a pressing need to

progress the Development Management Policies DPD through the development plan process to adoption early next year.

3. This report introduces the ‘pre-submission’ Development Management Policies DPD and explains how its preparation has responded to last year’s consultation, the adoption of the replacement London Plan (July 2011) and Harrow’s Core Strategy (February 2012), as well as the recent publication of the NPPF.

## **B. Options Considered**

4. In view of the Council’s commitment, set out in Harrow’s Local Development Scheme (LDS) and corporate priorities, to prepare a Development Management Policies DPD, and the local policy vacuum that would open up if the Unitary Development Plan saved policies are not replaced, the option not to progress with the preparation of the DPD can be discounted.

5. In terms of policy content, the 2011 consultation draft Development Management Policies DPD represented the Council’s ‘preferred option’ and included some possible alternative approaches, although in many policy areas the strong direction given by national policy and the London Plan mean that there are no realistic alternatives. The ‘pre-submission’ Development Management Policies DPD has been prepared taking account of responses to the 2011 ‘preferred option’ consultation document.

## **C. Pre-Submission Development Management Policies DPD**

6. The pre-submission Development Management Policies DPD will be published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (previously ‘Regulation 27’). This represents the final stage of consultation, being the version of the DPD that it is intended to submit for Examination in Public, and requires consultees to consider whether the plan meets legal requirements and is ‘sound’. The tests of soundness are explained later in this report (see ‘Next steps’).

7. The schedule attached to this report sets out in detail how the pre-submission Development Management Policies DPD addresses the responses received during the preferred option consultation. The preparation of the pre-submission document has also been informed by strategic policy documents that have been adopted in the period since the 2011 consultation; namely:

- the NPPF;
- the London Plan; and
- the Harrow Core Strategy.

8. The following paragraphs summarise and explain the main policy changes by chapter:

## **Character and Amenity**

9. This chapter contains criteria based policies for the design & layout of development, the protection of locally designated views, and for the management of shopfront and advertisement applications. A separate policy to deal specifically with the application of Lifetime Neighbourhoods principles has been added in response to the London Plan (various policies) and Core Strategy Policy CS1(E). The policy relating to the Borough's Areas of Special Character (ASC) has been imported into this chapter from the conservation and heritage chapter, reflecting the principal function of this policy as a local landscape/character designation rather than a heritage asset.

10. Policy 1 (*Achieving a High Standard of Development*) has been substantially revised to provide more comprehensive criteria for design and layout considerations and privacy and amenity. This responds in particular to Core Strategy Policy CS1(B) and the need to ensure comprehensive replacement policy criteria for the design and layout of development.

11. Policy 3 (*Protected Views and Vistas*) has been substantially revised to reflect London Plan policies 7.11 and 7.12, the London View Management Framework and the recently completed Harrow Views Assessment, which forms an addition to the evidence base.

12. Minor changes to wording and criteria of policies 4 (*Shopfronts and Signs*) and 5 (*Advertisements*) have been made to improve their application. Policy 6 (*Areas of Special Character*) has been amended to provide a clear statement against substantial harm, in response to consultee comments, and to provide criteria which more accurately represent the special characteristics of the designated areas.

## **Conservation and Heritage**

13. This chapter contains policies for the Borough's designated and non-designated heritage assets. Designated heritage assets comprise listed buildings, conservation areas, scheduled ancient monuments and registered parks and gardens. Non-designated heritage assets comprise locally listed buildings, archaeological priority areas and locally listed parks and gardens. As noted above, the Area of Special Character policy has been exported to the Character and Amenity chapter.

14. Policy 7 (*All Heritage Assets*) has been retained as a single, comprehensive policy of principles for all heritage assets but has been revised in response to consultation responses and the NPPF. Support was received for the policy's enabling development provisions, but these have been separated to form a specific new policy (Policy 8) and revised, in line with the NPPF, to deal with impacts and significance.

15. Policy 9 (*Conservation Areas*) and 10 (*Listed Buildings*) continue to provide specific, detailed criteria in relation to these designated assets, but have been revised in response to consultee comments to clearly state the

substantial weight that will be afforded to their protection. The criteria have been organised and amplified to set out how preservation and enhancement of assets will be achieved.

16. In response to consultee comments a new policy (Policy 11) has been introduced to manage development affecting locally listed buildings. Similarly, in response to comments, archaeology policies have been re-ordered to provide a logical progression – Policy 12 (*Scheduled Ancient Monuments*) and Policy 13 (*Archaeology*) – and have been substantially re-written to provide ensure appropriate levels of protection, consistent with the NPPF.

17. As with listed buildings, Policy 14 (*Nationally Registered Historic Parks and Gardens*) has been revised in response to consultee comments to underscore the presumption against harm or loss, and a new separate policy (Policy 15) has been added to deal specifically with locally listed sites.

### **Environmental Sustainability**

18. This chapter gives effect to the Core Strategy by setting out the detailed, local requirements for the mitigation of flood risk and for sustainable building design.

19. Policies 16 (*Managing Flood Risk*) and 17 (*On Site Water Management and Attenuation*) have been substantially revised, in light of consultee comments and the policy recommendations of new evidence base documents<sup>1</sup>. They now include design and layout criteria for sites at risk of flooding, a presumption against the loss of undeveloped floodplain, and afford substantial weight to the achievement of Greenfield run off rates.

20. Policy 18 (*Protection and Enhancement of River Corridors and Watercourses*) has been substantially revised to clarify the circumstances in which it will be applied, and to provide increased flexibility in the requirements for undeveloped buffer zones. The requirements for river restoration, previously in a separate policy, are now included in this policy and again flexibility has been introduced to allow for financial contributions in lieu of river restoration in some circumstances. These changes respond to consultee comments.

21. The preferred option policy on resource efficiency and environmental standards has been replaced by three new policies: Policy 19 (*Sustainable Design and Layout*); Policy 20 (*Decentralised Energy Systems*); and Policy 21 (*Renewable Energy Technology*). This is to ensure that local policies reflect the LDF preparation requirements of the London Plan<sup>2</sup> and the commitment given in Core Strategy Policy CS1(T) to bring forward policies which compliment those in the London Plan in respect of climate change.

22. Policy 22 (*Prevention and Remediation of Contaminated Land*) has been amended to set out the circumstances in which a risk assessment will

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<sup>1</sup> Specifically, the Level 2 Strategic Flood Risk Assessment and Harrow's Surface Water Management Plan.

<sup>2</sup> In particular: Policy 5.3 *Sustainable Design and Construction*; Policy 5.5 *Decentralised Energy Networks*; and Policy 5.7 *Renewable Energy*.

be required, in response to consultee comments, and to give effect to such assessments in the decision making process. The policy has also been updated to reflect the NPPF.

23. In response to consultee comments and the NPPF, the preferred option policy on non-native species management has been deleted. This is because such matters are adequately controlled through the requirements of other, dedicated legislation.

### **Green Belt, Metropolitan Open Land and Biodiversity**

24. Policies for the control of development in the Green Belt are provided in the NPPF and the London Plan. The London Plan also applies an equivalent approach to development in Metropolitan Open Land. This introductory text to this chapter has been substantially amended to signpost these provisions. The chapter goes on to provide local policies where these are needed to supplement the NPPF and London Plan, and to deal with local open space, biodiversity and landscape matters.

25. Policy 23 (*Redevelopment of Previously-Developed Sites within the Green Belt and Metropolitan Open Land*) has been substantially amended to reflect revised national policy in the NPPF and to ensure that there are robust, local criteria for the management of development proposals in these locations. The reasoned justification to the policy has been expanded to restore some of the detailed provisions that were in the PPG 2 annex but have not been reproduced as part of the NPPF.

26. A new policy (Policy 24) has been introduced on the use of Green Belt and Metropolitan Open Land. This responds to the NPPF, which states that local authorities should plan for the beneficial use of the Green Belt, and will ensure that existing UDP policies on uses are appropriately replaced.

27. Harrow's Core Strategy justifies a continuing presumption against the loss of open space, but allows for ancillary development (such as sport pavilions) where this is needed to enable proper functioning of the space. Pursuant to this approach, Policy 25 (*Protection of Open Space*) has been amended to provide tight criteria for reconfiguration, ancillary development and the use of existing ancillary of buildings.

28. The Core Strategy also seeks new open space to support growth across the Borough. New Policy 26 (*Provision of New Open Space*) gives effect to the requirement in respect of major residential development proposals.

29. Following consultation comments Policy 27 (*Protection of Biodiversity and Access to Nature*) and Policy 28 (*Enhancement of Biodiversity and Access to Nature*) provide strengthened criteria and give effect to Harrow's Biodiversity Action Plan. These policies relate to all biodiversity within the Borough, and consequently the preferred option policies relating to sites of nature conservation importance and areas with features of importance are unnecessary and have been deleted.

30. As with non-native species (above), sites of special scientific interest (SSSI) are protected by dedicated legislation. The preferred option policy relating to SSSIs has therefore been deleted.

31. Policies on sport, recreation and floodlighting are now contained in the community infrastructure chapter. Separate policies on allotments and cemeteries are considered unnecessary as these form part of local open space protected by Policy 25, and their enhancement is unlikely to be delivered through development management. A new policy on trees and landscaping has been introduced to ensure that existing UDP provisions are appropriately replaced.

## **Housing**

32. Strategic housing policies are contained in the London Plan and Harrow's Core Strategy. The introductory text this chapter has therefore been amended to clearly signpost these provisions, leaving the policies in this chapter to focus on local, qualitative aspects of housing development.

33. Policy 32 (*Housing Mix*) is a new policy to give effect to a housing mix which it is intended to set out in a Planning Obligations SPD. The provisions give effect to Core Strategy Policy CS1(l) and replace the preferred option 'new housing' policy which is considered superfluous in light of the adopted spatial strategy.

34. New policies have been introduced to provide criteria for conversions of offices and the conversion of houses to smaller units (Policies 33 and 34 respectively). These respond to the Core Strategy and ensure that existing UDP provisions are appropriately replaced.

35. A new policy (Policy 35) has also been introduced to provide criteria for the consideration of amenity space provision. Again this responds to the Core Strategy and ensures that existing UDP provisions are appropriately replaced.

36. Policies 37 (*Children and Young People's Play Facilities*), 38 (*Sheltered Housing, Care Homes and Extra Care Housing*) and 39 (*Large Houses in Multiple Occupation and Hostels*) have been retained with minor changes in response to consultee comments. These include clarification that play facilities will only be sought from developments involving a net increase in child yield, and the extension of Policy 38 to include extra care housing.

## **Employment and Economic Development**

37. This chapter sets out policies for the management of employment land supply and for supporting sustainable economic development in the Borough.

38. The Core Strategy recognises that there is a modest surplus of employment land in the Borough and sets out a sequential approach for the release of sites. Policies in this chapter have been substantially revised to achieve greater consistency with the Core Strategy. Policy 40 (*Managing Land Supply: Industrial and Business Use Land and Floorspace*) provides criteria for release and amplifies the sequential approach. Policy 41

(*Managing Land Supply: Town Centre Offices and Northolt Road*) make equivalent provisions for the management of office space supply.

39. New Policy 42 (*Economic Activities and Development*) provides support for economic development within business and industrial use areas, and for comprehensive redevelopment of estates. Policy 43 (*Working at Home*) continues to support appropriate home working activities and, in response to consultee comments, has been amended to require the incorporation of space for home working within major new residential development.

40. Policy 44 (*Hotel and Tourism Development*) has been amended to ensure that hotel development is inclusive to all and provides a proportion of wheelchair accessible bedrooms. This reflects the London Plan and consultee comments. An additional requirement for Travel Plans with major hotel proposals, and criteria for the consideration of guest house and B&B proposals, have been included to ensure that existing UDP provisions are appropriately replaced.

41. In response to consultee comments Policy 45 (*Loss of Public Houses*) has been amended to limit application of the policy to purpose-built pubs, and to include evening economy activities as being appropriate alternative uses for these premises.

## **Town Centres and Retail Development**

42. This chapter sets out the policies for town centre development and changes of use. The objective of the policies is to maintain and improve the vitality and viability of town centres.

43. Policy 46 (*New Town Centre Development*) is a new policy to give effect to the London Plan and Core Strategy by directing town centre development to town centre sites, and to set out strict criteria for the consideration of out of town proposals.

44. Policies 47 (*Primary Shopping Frontages*), 48 (*Secondary and Designated Shopping Frontages*) and 49 (*Other Town Centre Frontages and Neighbourhood Parades*) have been amended to improve clarity and, in response to consultee comments, increase flexibility. Specifically, they allow for proposals that would breach the proportion of non-retail frontage permitted within a centre to be approved if the proposal would, nonetheless, contribute to the centre's vitality and viability.

45. Policy 50 (*Vacant Shops in Town Centres and Neighbourhood Parades*) is a new policy setting out criteria for the use of shops in centres with a long-term vacancy problem. This has been introduced to ensure that existing UDP provisions are appropriately replaced.

46. Policy 51 (*Mixed Use Development in Town Centres*) has been amended, in response to consultee comments, to provide a positive context and supporting criteria for mixed use proposals.



47. Policy 52 (*Evening Economy*) has been simplified, by focusing on impacts, to allow greater flexibility for proposals that are appropriate to the centre in which they are located.

## **Transport and Waste**

48. This chapter sets out the local policy requirements of development in relation to transport and waste matters.

49. Policy 53 (*Parking Standards*) has been substantially revised in response to consultee comments and the London Plan. However the broad approach, of applying London Plan standards, remains. Flexibility has been built in for the consideration of proposals that would involve levels of provision not consistent with the London Plan, and criteria for car free development and car clubs have been amplified/clarified. An additional provision deals with the design and layout of parking areas.

50. To reflect the provisions of the Core Strategy a new policy (Policy 54) has been introduced to specify the requirements for transport assessments and to give effect to them in the decision making process. A further new policy (Policy 55) deals with the servicing requirements of new development, and has been introduced to ensure that existing UDP provisions are appropriately replaced.

51. Policy 56 (*Waste Management*) has been amended to amplify the requirements for on-site waste management in new development. In response to consultee comments, the policy now also requires major development proposals to provide a site waste management plan.

## **Community and Infrastructure**

52. This chapter sets out policies for the protection of existing, and the provision of new, community, sport and educational facilities.

53. Policy 57 (*New Community, Sport and Education Facilities*) has been amended to allow for the refurbishment and re-use of existing premises, and to set out criteria for the provision of new facilities. In response to consultees, the policy now also seeks community access to new educational and indoor sport development. The preferred option policy on the use of offices as education and training centres has been deleted (this had been located in the Employment and Economic Development chapter) and new criteria to deal with the impact of community and education uses in offices has been included in this policy.

54. New Policy 58 (*Retention of Existing Community, Sport and Education Facilities*) and 59 (*Enhancing Outdoor Sports Facilities*) provide criteria which seek to control the loss of, and support the enhancement of, existing facilities. This includes policy relating to floodlighting proposals. These policies have been introduced to ensure that existing UDP provisions are appropriately replaced, and to reflect the NPPF.

## **Telecommunications**

55. This chapter contains one policy (Policy 60) dealing with proposals for telecommunications development. In response to consultee comments, the policy and the NPPF, the policy has been amended to provide positive criteria for the consideration of proposals, and the consultation requirements of the Code of Best Practice have been moved from the policy into the reasoned justification text. The introductory text to the chapter has also been amended to give greater recognition to the importance and potential future growth of the telecommunications sector.

## **Implementation, Resources and Monitoring**

56. This chapter sets out policy on the use of Planning Obligations (Policy 61) and the use of the Council's enforcement powers (Policy 62). Policy 61 and the associated reasoned justification has been substantially amended to reflect the more focused role of Planning Obligations, following the adoption of a Harrow Community Infrastructure Levy. Minor amendments to Policy 62 clarify the approach to enforcement action, and the reasoned justification now includes reference to Harrow's new enforcement policy.

## **D. Compliance with tests of soundness**

57. The pre-submission consultation and Examination in Public will focus on the tests of soundness set out in the NPPF. To be a sound plan, the DPD must be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

58. In relation to each of these tests:

### **Positively Prepared**

59. The NPPF states that plans should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.

60. The Development Management Policies DPD gives effect to the London Plan and the Core Strategy which set out the Borough's development requirements and, in the case of the Core Strategy, was informed by a local infrastructure delivery plan.

### **Justified**

61. The NPPF states that the plan should be the most appropriate strategy when considered against the reasonable alternatives.

62. The evidence base underpinning the Core Strategy also justifies the provisions of the Development Management Policies DPD. The policies

represent the most appropriate local response to the London Plan and the Core Strategy policies.

### **Effective**

63. The NPPF states that the plan should be deliverable over its plan period and based on effective joint working on cross boundary matters.

64. The policies have been drafted to provide positive support for appropriate development and to focus on impacts that need to be managed.

### **Consistent with national policy**

65. The Development Management Policies DPD has been revised to ensure that it complies with the recently published NPPF, as well as taking on board consultee comments wherever possible.

## **E. Next steps**

66. Subject to Cabinet and Full Council approval, the Development Management Policies DPD will be published for pre-submission public consultation in accordance with Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement), for a six week period. The pre-submission consultation is scheduled to take place during July and August. Following the consultation, the LDF team will consider all representations received and if necessary produce and consult upon any minor modifications arising from that consultation. It is anticipated that the DPD will be submitted to the Planning Inspectorate in September and that Examination in Public will take place during December. This programme should enable adoption of the DPD to take place by April 2013.

## **F. Financial Implications**

67. The cost of preparing, publishing and consulting upon the Development Management Policies DPD, Site Allocations DPD and Harrow & Wealdstone Area Action Plan, are provided-for by LDF budget together with a dedicated allocation from Planning Delivery Grant (PDG) funds as set out in the Council's Medium Term Financial Strategy. The time table for progression of the three documents has been deliberately co-ordinated to maximise savings associated with simultaneous consultation, submission and Examination in Public.

## **G. Legal Comments**

68. The legal requirements for the preparation and consultation of Development Plan Documents are set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. A failure to comply with the statutory requirements may result in the DPD being found 'unsound' at the examination in public.

## H. Performance Issues

69. A key piece of LDF evidence base is the Annual Monitoring Report, which highlights the performance of existing UDP policies against relevant national and local indicators. The findings of the latest AMR have been used to inform the Sustainability Appraisal of the three DPDs, which seek to ensure the DPDs, where relevant, address areas of weak performance and to build on those areas where the Borough is performing well.

## I. Environmental Impact

Does the proposal comply with all relevant environmental legislation? Yes

70. It is a statutory requirement that DPDs are subjected to a Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment. A Sustainability Appraisal has been undertaken and will be published for public consultation and comment alongside the DPD.

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

## J. Risk Management Implications

33 Risk included on Directorate risk register? Yes

34 Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	To meet the test of 'soundness' of DPDs are required to comply with the legal requirements for preparing and consulting on DPDs under the Planning and Compulsory Purchase Act.	Officers will seek to ensure compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for consultation. The LDF team will maintain a log that chronicles legal compliance of the DPDs as they progress towards examination and adoption.
Reform of the plan-making system	The Government has now implemented many of its reforms including the publication, following consultation, of a new National Planning Policy Framework.	The recent publication of the NPPF has enabled the resulting national policy position to be fully reflected in the DPD which it is intended to submit.
Inappropriate consultation responses	A real risk with consultation on the DPDs is that consultees	The DPD is clear that the purpose is to give effect to the Core Strategy, including the agreed spatial strategy,

	will make representations in respect of matters that have already been dealt with through the Core Strategy and are therefore not up for further debate.	which includes the broad distribution and quantum of development to be accommodated, as well as the strategic objectives regarding the safeguarding of specific types of land use, including employment and open space.
Resourcing	The DPD is being prepared and published in tandem. There is a risk that at key stages in the plan making process, resources in the LDF team may not be sufficient to maintain the timetable agreed in the revised LDS.	Officers will monitor the workload in respect of the three DPDs being prepared and will seek to manage peaks or crunch points in the process. However, the workload associated with any one DPD is dependant on the level of community interest, number of responses received to consultation and the complexity of the matters raised. Where necessary, additional staff resources may need to be drafted in for short periods. This will be done in consultation with the Director of Planning and seek to give opportunities to those within the department who may wish to gain policy experience.

## K. Equalities implications

71. An equalities impact assessment will be undertaken of the three DPDs. This will build on the previous EQIA prepared for the Core Strategy and will be made available to view on the Council website at the time the documents are published for public consultation.

## L. Corporate Priorities

72. The DPD will help to deliver the following emerging corporate priorities:

- **Keeping neighbourhoods clean, green and safe:** by promoting a better quality built environment and public spaces, and considering options for enhancing green infrastructure and access to open spaces.
- **United and involved communities - a Council that listens and leads:** Engagement with the community and others is at the heart of the LDF process. The Development Management Policies DPD responds to the comments received during the 2011 'preferred option' consultation and, by giving effect to the Core Strategy, reflects the many formal and informal stages of consultation undertaken during the preparation of that document.
- **Supporting our Town centre, and local shopping centres and businesses:** The DPD will provide a positive and clear policy framework to guide the future development and growth within town centres and local parades, as well as securing appropriate investment in infrastructure and required environmental improvements.

### **Section 3 - Statutory Officer Clearance**

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 28 May 2012		
Name: Abiodun Kolawole	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 28 May 2012		

### **Section 4 – Performance Officer Clearance**

Name: David Harrington	<input checked="" type="checkbox"/>	on behalf of the Divisional Director Partnership, Development and Performance
Date: 25 May 2012		

### **Section 5 – Environmental Impact Officer Clearance**

Name: Andrew Baker	<input checked="" type="checkbox"/>	on behalf of the Divisional Director (Environmental Services)
Date: 24 May 2012		

### **Section 6 - Contact Details and Background Papers**

**Contact:** Matthew Paterson, Senior Professional Planning Policy, Place Shaping, 020 8736 6082

#### **Background Papers:**

Pre-Submission Development Management Policies DPD

**Call-In Waived by the  
Chairman of Overview  
and Scrutiny  
Committee**

**NOT APPLICABLE**

*[Call-in does not apply as the  
decision is reserved to Council]*

## Schedule 1: Responses for 'preferred option' Development Management Policies DPD (2011)

ID No.	Respondent	ID No.	Respondent
1	The Coal Authority	29	Mr Stewart Braddock Croft Partners (Pinner) LLP
2	Planning Potential Ltd	30	Jennifer Kitson Savills Planning
3	Claire Hancock CB Richard Ellis Ltd on behalf of Land Securities	31	Rose Freeman
4	Teri Porter CB Richard Ellis Ltd on behalf of Dandara	32	Ms Carolyn Wilson Senior Planner Mono Consultants Ltd
5	Alun Evans (CGMS Consulting)		
6	Mayor of London (Greater London Authority)		
7	Mr Jed Griffiths Planning Agent RNOH		
8	David Hammond Natural England, London & South East Region		
9	Mr Tim Owen		
10	Dr Ruth Boff The Pinner Association		
11	Chartered Town Planning Consultants Robin Bretherick Associates		
12	Anne Swinson Hatch End Association		
13	Planning Liaison Officer Environment Agency		
14	Mr John Ratcliff Representative Harrow Friends of the Earth		
15	Stuart Slatter Planning Potential		
16	Mr Mark Matthews Thames Water Property Services		
17	Mr alan richardson		
18	Graham Saunders English Heritage (London Region)		
19	Nick Stafford Preston Bennett Planning		
20	Mr M Weiser Associate Pegasus Planning Group		
21	Jewish Community Housing Association (NLP)		
22	roy warren (Sport England)		
23	Mr Marc Mesgian Planner Arcadis A Y H Plc		
24	Andrew Ransome Ransome&Company (Workspace Group PLC)		
25	Firle investments Ltd, C/o Provision Planning & Design		
26	RC Watson & Son Ltd, c/o Provision		
27	Maire McKeogh Planner RPS Planning		
28	Mr David Sklair		



ID	Rep No.	Section / Para	Summary of Comments	Change Suggested	Council Response
1	001	General	<p>Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage. We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address <a href="mailto:planningconsultation@coal.gov.uk">planningconsultation@coal.gov.uk</a> , on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website. Alternatively, please mark all paper consultation documents and correspondence for the attention of Planning and Local Authority Liaison. Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).</p>	None	None

2	002	General	<p>We act on behalf of Fairview New Homes Ltd, who are working with ColArt Fine Arts &amp; Graphics Ltd, and would appreciate confirmation of receipt of this submission. Whilst in the main we support the general direction of the emerging policy as contained in the Regulation 25 Consultation, we wish to put forward the following general and generic observations and on occasions, some specific commentary is provided. We note the acceptance in the early part of the document that the emerging Development Management Policies Document must be in accordance with higher level plans. Not only does this require the document to be in accordance with National Policy (and specifically we reference PPS3, PPS4, PPS5), but also that the emerging policy must be in accordance with the Regional Plan being the Replacement London Plan due for adoption late 2011, the emerging Harrow Core Strategy due for submission to secretary of state later this month (June 2011) and generally, to not be contradictory to any under Development Plan Documents. We acknowledge at this stage that the detailed policy wording will be a function of the refinement through the consultation, and at this stage, the draft policies are produced for direction purposes and we will comment as appropriate. With regards to all policies (policy 1 through to, and including, policy 52) there are a few generic points our client wishes to make, as referenced in the recent National Planning Policy Framework Practitioners Advisory Group Report; Development managing policies should avoid being over prescriptive Policies should be clearly stated, and contain only that which is necessary to guide development Policies should be drafted in such a way as to allow a flexible and responsive approach to the "plan, monitor and manage" regime Policies should be drafted to be cognisant of the Central Government's growth agenda and the first primary principle "in favour of sustainable development" The application of policies should be such that the context of sites specific considerations and viability should be able to be clearly defined to allow the correct application of the policy.</p>	Flexibility of policies throughout to support growth	The policies have been overhauled to ensure they support growth where appropriate, and give flexibility where needed.
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2	002	General	<p>We also note that of key consideration in the production of Development Plans is recent Government Announcements and Ministerial Statements, albeit that these are made in the absence of having robust policy in place, nevertheless the emerging policy will continue these themes;</p> <p>there is a new presumption in favour of sustainable development. This is a powerful new principle underpinning the planning system that will help ensure the default answer to development and growth is 'yes' rather than 'no'. A pro-growth National Planning Policy Statement is to be prepared. The planning system is considered too cumbersome and complicated, and has acted as a break on growth and development - a new simple document called the National Planning Policy Framework will be published. Immediately prioritising growth and jobs. The Government has given clear indications that expectations are that every Council should be encouraging and supporting growth. Council's must ensure they are not imposing unnecessary burdens in the way of development. As recently as the 15th June, Greg Clarke (MP) confirmed the Governments presumption in favour of sustainable development. The pro-development agenda theme is central to hisstatement in so far as he is encouraging Local Planning Authorities to plan positively for new development and approve all individual proposals wherever possible. His statement went on further to identify that Local Planning Authorities should prepare Local Plans on the basis of objectively assessed development needs, allowing sufficient flexibility to respond to rapid shifts in demand or economic changes. It is in light of all of the above comments that we provide specific commentary to the policies contained in the Draft Development Management Policies DPD</p>	Flexibility of policies throughout to support growth	The policies have been overhauled to ensure they support growth where appropriate, and give flexibility where needed.
3	003	General	<p>Having reviewed the consultation document in its entirety, Land Securities wishes to make one overarching comment on the content of the draft DMP DPD. It is considered that it needs to be made clear throughout the document that the DMP DPD includes policies to be applied to the area of the Borough outside the proposed Harrow and Wealdstone Intensification Area only. From the drafting of the various chapters within the DMP DPD, this is not always apparent.</p>	It needs to be clear that the DMP DPD includes policies to be applied to the area of the Borough outside the proposed H&W IA only	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.

4	004	1	<p>You will be aware that our client has made various representations to emerging policy documents over the years, including the Submission Draft Harrow Core Strategy and the other emerging Development Plan Documents (DPD's). Dandara welcome the opportunity to comment on the Draft Development Management Policies (DDMP DPD). Prior to do so, we would be grateful if the Council could clarify that policies contained within the DDMP DPD do not relate to sites within the Harrow and Wealdstone Intensification Area. The Area Action Plan (AAP) associated with the Intensification Area outlines that:- "Overall, the aim of preparing the AAP is to have a single, statutory plan, that provides clarity and certainty to landowners, developers, service providers and the community about how places and sites within the Intensification Area will develop, and against which investment decisions can be made and development proposals can be assessed". (para. 107 of the AAP). Â We agree that the AAP should be the single, statutory plan which contains the policies required to guide development within the Intensification Area. If this is the Council's intention, the DDMP DPD must clearly state that the policies contained therein do not relate to proposals within the Intensification Area. Notwithstanding that the DDMP DPD may not be of relevance to proposals for the College Road site as this is located within the Intensification Area, we have a number of comments on the emerging draft document. For ease of reference, we will comment upon each policy in turn.</p>	<p>It needs to be clear that the DMP DPD includes policies to be applied to the area of the Borough outside the proposed H&amp;W IA only</p>	<p>Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.</p>
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5	005	1	<p>Context to Representations – I draw your attention in particular to the policy background which supports the provision of policing. It is essential to ensure that the LPA understand the planning policy background which supports the MPA/S' representations. Provision for policing and supporting the MPA/S' objectives is a key strategic requirement in order to ensure that safe and secure communities are developed across the London Borough of Harrow. – Relevant Planning Policy – National &amp; Strategic Policy – PPS1 - paragraph 27 (iii) development plan preparation the need to promote communities which are healthy, safe and crime free is confirmed. PPS12 - requires emerging development plan policy to be consistent with the adopted development plan and 'soundness' requires DPD policies to be consistent with national policy. Adopted London Plan (2008) - Policies 3A.17, 3A.18, 3A.26, 3B.4, 4B.6 and supporting text ref 3.99 support the provision of relevant social infrastructure, which specifically refers to policing within its definition. Emerging London Plan (2009) - further reinforces the need for adequate policing facilities across London within Policies 2.6, 2.13, 2.15, 3.17, 4.4, 4.6, 7.3 &amp; 7.13. – It is clear therefore that a planning policy framework exists at National and strategic levels that protects and promotes policing as a community use. Government guidance within Planning Policy Statement 12 (PPS12) states that Local Development Framework Documents should reflect the strategic development plan (Para 4.2). The policy context above identifies the requirement for policing needs to be taken into consideration in the formulation of local policy documents and as such it is important for relevant policies to be reflected within the emerging Development Management Policies DPD. The MPA/S are mindful that significant additional development is likely to come forward within Harrow, through the introduction of new uses and the intensification of existing uses. The scale of development will increase demands on police resources, and the MPA/S request that the impact upon policing be regarded as a material consideration during the application determination process and reflected within the emerging development plan document.</p>	<p>The MPA/S request that the impact upon policing be regarded as a material consideration during the application determination process and reflected within the emerging development plan document.</p>	<p>The impacts on essential services are a material consideration in planning applications, however it would not be appropriate to list all of these here. The need for increased provision of essential infrastructure as a result of development is covered in Harrow's Core Strategy.</p>
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6	006	1.1	<p>The GLA notes the Council's intention that this DPD should set out development management policies in all parts of the borough, except for the Harrow and Wealdstone Intensification Area, where development management policies will reside within the Harrow and Wealdstone Area Action Plan. Officers do not have an objection to this approach, however, the Council should think carefully about how this relationship would work, and use clear cross-referencing between DPDs to avoid repetition, while ensuring clarity for the reader. The Council may wish to express the spatially specific nature of the Development Management Policies DPD and the Harrow and Wealdstone AAP diagrammatically at the start of this document to provide clarity to the reader. A borough map, shaded to indicate where development policies within each DPD would apply, should simply and quickly express the relationship between these two documents.</p>	<p>The Council may wish to express the spatially specific nature of the Development Management Policies DPD and the Harrow and Wealdstone AAP diagrammatically at the start of this document to provide clarity to the reader</p>	<p>Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.</p>
3	007	1.2	<p>Paragraph 1.2 of the consultation document confirms that the role of the DMP DPD is to provide "detailed local policies for the management of future development outside of the Harrow Intensification Area. Within the Intensification Area, the policies of the Harrow and Wealdstone Area Action Plan will fulfil this role." Land Securities welcomes this statement, but considers that it would be beneficial (for the purposes of clarity) to confirm that the DMP DPD therefore does not apply to sites within the Harrow and Wealdstone Intensification Area.</p>	<p>It would be beneficial (for the purposes of clarity) to confirm that the DMP DPD therefore does not apply to sites within the Harrow and Wealdstone Intensification Area.</p>	<p>Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.</p>

3	008	1.7	<p>Paragraph 1.7 of the draft DMP DPD confirms that the document will support the delivery of the vision for Harrow set out in the Core Strategy and in all other documents contained within the LDF. It is noted that the Harrow and Wealdstone AAP will have its own policies to deliver the Core Strategy vision, and in this way, the DMP DPD should be complementary to the AAP. For the avoidance of doubt, it is considered that it would be helpful to include a plan illustrating the boundary of the Intensification Area within the DMP DPD, confirming that the area within the boundary is subject to a separate DPD within the LDF, and that policies and proposals relating to sites within that boundary will be included within the AAP. Where development proposals span the boundary between the Intensification Area (covered by the AAP) and the wider Borough, it may be necessary for policies relating to both the AAP and the DMP DPD to be considered.</p>	<p>It would be helpful to include a plan illustrating the boundary of the Intensification Area within the DMP DPD, confirming that the area within the boundary is subject to a separate DPD within the LDF</p>	<p>Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.</p>
6	009	1.7	<p>Â The GLA welcomes the Council's intention that policies within the Development Management Policies DPD should be locally specific, and not repeat national and regional policies. It is also noted that the Council intends to refer to national policies, and/or the London Plan, where a local issue would be adequately dealt with by existing policies at the national or regional level. This will ensure the DPD remains concise, and is supported. Â However, the success of this approach is heavily dependant on clear and robust cross-referencing. The Council should, in particular, have regard to comments 5, and 17, in this appendix on energy, and strategic industrial locations, and ensure that relevant London Plan policies are clearly signposted to avoid any possible concerns of non-general conformity by way of omission.</p>	<p>The Council should, in particular, have regard to comments 5, and 17, in this appendix on energy, and strategic industrial locations, and ensure that relevant London Plan policies are clearly signposted to avoid any possible concerns of non-general conformity by way of omission.</p>	<p>Document amended to refer to relevant London Plan policies.</p>

3	010	1.10	Paragraph 1.10 of the consultation document states that "the policies in this Development Management Policies DPD play an important role in the delivery of the overall vision and objectives for the Borough as set out in the Core Strategy." It is noted that the policies within the document will be important in delivering the strategic vision and objectives for Harrow, but that they are limited to the area outside the Intensification Area (IA). Within the IA, the policies within the Harrow and Wealdstone AAP will be responsible for delivering the Core Strategy vision.	None	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.
3	011	1.14	Paragraphs 1.14-1.16 of the draft DMP DPD refers to the relevant national planning context within which the document is being prepared. It is considered that it would be helpful to acknowledge the changes to national policy that are imminent as a consequence of the emerging Localism Bill, including the draft National Planning Policy Framework (NPPF), and to confirm that future iterations of the DPD will seek to have regard to them as appropriate.	It would be helpful to acknowledge the changes to national policy that are imminent as a consequence of the emerging Localism Bill, including the draft National Planning Policy Framework (NPPF), and to confirm that future iterations of the DPD will seek to have regard to them as appropriate.	These policies have been amended to be in conformity with the now published NPPF.



7	012	1.14	This paragraph will need to be updated to refer to the fact that the Government is to prepare a National Planning Policy Framework (NPPF). A Government draft is likely to be available at the end of July 2011 and the final version is expected to be approved by April 2012. This will replace the current series of Planning Policy Guidance Notes and Planning Policy Statements. There should be reference to the role of planning in tackling climate change and the context of the Climate Change Act 2008. This issue is intrinsically linked to sustainable development, which will be freshly defined in the NPPF.	This paragraph will need to be updated to refer to the fact that the Government is to prepare a National Planning Policy Framework (NPPF).	The DPD has been amended to be in conformity with the now published NPPF.
3	013	1.19	Paragraph 1.19 of the draft DMP DPD again refers to how the document will seek to give effect to the spatial vision and objectives of the Core Strategy. It is considered that it should be clarified that the document's remit is for the area of the Borough outside the IA only.	It is considered that it should be clarified that the document's remit is for the area of the Borough outside the IA only.	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA
6	014	2	Supported, no specific comments.	None	None
8	015	2	Paragraph 2.3 refers to the protection of Green Belt, Metropolitan Open Land (MOL) and Open Spaces which is welcomed by Natural England and to be encouraged. The links to Planning Policy Statement 1 is acknowledged and the Council should seek to incorporate Green Infrastructure in all development opportunities, where appropriate, helping to comply with this Statement.	The Council should seek to incorporate Green Infrastructure in all development opportunities, where appropriate, helping to comply with this Statement.	Protection of open spaces is continued. The provision of new green infrastructure is encouraged in policy.

3	016	2.1	Paragraph 2.6 of the consultation document confirms that the Council will encourage new-build development to be secured on previously developed land, but that an exception to this may apply to "ancillary development necessary to support appropriate uses within Green Belt, Metropolitan Open Land and open space and to residential dwellings with garden space". It is noted that open space is not subject to the same restrictions in planning terms as Green Belt and MoL land, and this should be made clear within the text. Paragraph 2.22 of the draft DMP DPD confirms that the Council will apply policy on design considerations to all new development to respond to the local context. It is considered that this sentence should refer to all new development in areas of the Borough outside the IA.	Open space is not subject to the same restrictions in planning terms as Green Belt and MoL land, and this should be made clear. Should refer to all new development in areas of the Borough outside the IA.	In line with Harrow's Core Strategy, all development on any type of Open Space will be resisted including residential development on garden land, excepting necessary ancillary development.
9	017	2.1	In para 2.6 the final part of the exceptions "and to residential dwellings with garden space" is inconsistent with the Core Strategy and other parts of the Development Management DPD which state clearly that residential gardens will be protected from new-build development. As such, this final exception should be deleted.	Omit and to residential dwellings with garden space	In line with Harrow's Core Strategy, all development on any type of Open Space will be resisted including residential development on garden land, excepting necessary ancillary development.
10	018	2.1	Section 2 - Protecting Harrow's Character and Residential Amenity: 2.1: there is a "typo" in the second bullet point - "... are as ..." should be "... areas ...". In general The Pinner Association strongly agrees with the aims and aspirations of this section, especially paragraphs 2.2, 2.3, 2.5, 2.6, 2.22 and 2.26, and Policies 1,2,3 and 4.	Typos	The document has been re-written, retaining the aspirations supported.
11	019	2.1	Chapter 2. 2,2 Should say "a high standard of design" 2.4 See below (6.4) for min internal space standards.	Grammar	This section has been re-written.

	077	Policy 1	<p>The introduction to Policy 1 is welcomed in that the DDMP DPD encourages the highest standard of urban design for new development appropriate to its local context whilst acknowledging that in some instances, it may not be required to reflect the character of the surrounding area in terms of built form. Paragraph 2.2 sets out that "a contemporary form of architecture may be suitable in appropriate locations such as regeneration or intensification areas to create an identity or a landmark feature". The College Road site is located within the Intensification Area in an area that the Harrow and Wealdstone Area Action Plan describes as "unimpressive with few opportunities for orientation" (paragraph 4.27). Indeed the Secretary of State in his conclusion on the appeal proposals relating to the College Road site (PINS Ref. APP/M5450/A/09/2115461, dated 22 nd July 2011) stated:- " I consider that well-designed buildings, marking the town centre rather better than any of the existing buildings, could enhance rather diminish the value of views".</p> <p>Therefore, we are of the view that the College Road site is an opportunity to deliver a contemporary form of architecture with a tall building element which will not only lead to the redevelopment of the former post office site but will regenerate this unimpressive area. It is our view that Policy 1 should be reworded to remove any ambiguity that a site has been identified to provide a landmark feature within the Intensification Area that could provide orientation for users of the town centre. The College Road site should be named as such within policy or the supporting justification.</p> <p>In line with the Replacement London Plan, Policy 1 seeks to optimise the potential of sites. This is welcomed by Dandara given that the intention is to maximise the opportunity to deliver development on their College Road site. However, it is important that policy and subsequent decisions do not place undue emphasis on an arbitrary density figure. With regard to the College Road proposal in respect of density, the Inspector and Secretary of State thereafter, established that the density of the appeal proposals for College Road was acceptable. The Inspector focused less so on the actual density and more so on whether the design and visual impact of proposal is acceptable. The Inspector concluded that:- " If the design and visual impact of a proposal is acceptable then it follows, in my opinion, that the density of the scheme is acceptable. If they are unacceptable, then I consider that the scheme should be rejected whether it not its density would be within acceptable limits". Policy 1 goes on to set out that the Council expects a design-led approach to be taken to sustainability measures to be incorporated. We would suggest that this element of the policy should read appropriate sustainability measures to be considered and not incorporated</p>	<p>Policy 1 should be reworded to remove any ambiguity that a site has been identified to provide a landmark feature within the Intensification Area that could provide orientation for users of the town centre.</p> <p>Flexibility on sustainability</p>	<p>The identification of a site to provide a landmark feature within the Intensification Area that could provide orientation for users of the town centre is acknowledged in the Area Action Plan, which covers the Intensification Area.</p> <p>Disagree. Sustainable development and energy efficiency forms and integral part to new development and will be sought in line with national requirements – flexibility in the choice of measures incorporated is therefore provided for.</p>
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5	078	Policy 1	Policy 1 seeks to optimise the potential of sites in order to create an inclusive environment that respects the character and setting of neighbouring development, the wider landscape and adds to the visual amenity of the place. The MPA/S support the reference to the Metropolitan Police initiative: 'Secured by Design'.	None	Support noted
8	079	Policy 1	Â This Policy is welcomed, especially in relation to the provision of integrated landscaping as part of proposals, having regard to the enhancement of biodiversity. The Council has set out a clear policy for the incorporation of biodiversity enhancement as part of an inclusive development proposal/planning application and this is to be commended and encouraged.	None	Support noted.
17	080	Policy 1	It is good that the first two aspects to be considered in respecting, inter alia, the wider landscape and the views associated with the site are scale and height, bulk & massing. However, it should be made much clearer that applications for developments far exceeding the height and/or mass of existing surrounding buildings will not be approved.	Applications for developments far exceeding the height and/or mass of existing surrounding buildings will not be approved	Policy revised to fully take account of surrounding heights and massing.
18	081	Policy 1	At present the Policy 1 Design of Development seeks to provide a broad criteria approach to the consideration of all development proposals, however it does not consider specifically tall buildings. We would suggest that as part of the Borough is being promoted as having the potential to accommodate tall buildings (i.e. Core Strategy), that greater clarity is provided on how these types of development will be assessed. With this in mind we would suggest the criteria based approach advocated in the EH/CABE Guidance on Tall Buildings (2007) (section 4.1.1-4.1.11) is reviewed and incorporated into Policy 1. This approach of greater clarity would ensure that this policy and the Development management document comply with PPS1 and PPS5. Policy 1 â€œ historic context The policy lacks specific reference to new designs respecting the historic context of the site and its surroundings. This is an unfortunate omission, especially as PPS1 promotes the need for developments to be integrated in to the existing urban form and the natural and built environment. However in order to achieve this aim, it is essential to understand the historic context and its contribution to the environment now and in the future (PPS5 Policy HE7)	Clarification on tall buildings.	The Core Strategy highlights that the Intensification Area is most appropriate for taller buildings, therefore the Area Action Plan contains the policies necessary to manage them. The design policies in this DPD have been amended to provide clearer guidance outside the IA.

4	082	Policy 2	<p>Policy 2 - Protection of Identified Views and Landmarks</p> <p>Policy 2 seeks to protect identified views and landmarks as identified on the Proposals Map. The policy goes on to outline that the Borough will exercise stringent controls over height, location and design of any buildings which might potentially impact on these views and landmarks. The DDMP DPD provides the following justification for this policy- Harrow possesses some of the most imposing landmarks and attractive skyline ridges and adds significant views to the quality of the local landscape; &amp; Poorly designed buildings can intrude on these views and would detract considerably from a key characteristic of the Borough. It is appreciated that there are important landmarks and views which the Council are seeking to protect but the wording of Policy 2 is considered to be overtly negative and inappropriate. The current wording suggests that new development will inherently have an unacceptable impact upon identified views and landmarks. As recognised within the London View Management Framework at a regional level, and by the current Secretary of State at a site specific level, this is not the case. Indeed, the London View Management Framework sets out that " new development should make a positive contribution to the characteristics and composition of the Designated Views" . The London Borough of Harrow should equally be embracing such development positively. Unlike Policy 2, it does not imply that new development will not be permitted. We would reiterate a quote from the appeal decision referenced earlier in this representation where the Secretary of State stated:- " I consider that well-designed buildings, marking the town centre rather better than any of the existing buildings, could enhance rather than diminish the value of views". The Secretary of State goes on to state:- "there is nothing inherently wrong in being able to see a piece of high quality architecture, even a tall one, within a densely urban scene, and that whilst there would be a significant change in views, it is important not to conflate visibility and harm". It is our view that Policy 2 does conflate visibility and harm. The policy should be reworded in such a way that it seeks to protect and enhance the place from which the view is seen as per the approach taken in the London View Management Framework. Moreover, the wording of policy in respect of "might potentially impact on these views and landmarks' is ambiguous and needs to be quantified to make the policy sound. The use of words "stringent' and "impact' must be removed. Only where proposals have a detrimental impact should they not be permitted. Indeed, from a site specific perspective, it follows that the current wording of Policy 2 has little regard to the Secretary of State's view in the appeal decision which confirmed the acceptability of a tall building on the College Road site. Indeed, policy must acknowledge the overall conclusion on the appeal proposal which clearly stated:- "I find no objection to the principle of a tall building (or buildings) on the appeal site (up to the height proposed in the appeal scheme)". It is evident from this statement that a tall building of up to 19-storeys on the College Road site has been accepted by the current Secretary of State. Nevertheless, Policy 2 seems to re-open the</p>	<p>The policy must reflect the current Secretary of State's decision.</p>	<p>The Secretary of States decision is reflected in the Core Strategy, and the Area Action Plan acknowledges the site as being acceptable for a tall building. The policy in this DPD has been amended following a new Views Assessment evidence base study to reflect its findings based on the London Views Management Framework.</p>
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17	083	Policy 2	This is an excellent and vitally important statement of Council policy. It must be adhered to rigorously, especially with regard to St Mary's Church.	None	Support Noted
8	084	Policy 3	Â Policy 3: Shopfronts and Signs Natural England does not wish to offer any substantive comments in respect of this Policy except to have regard to Planning Policy Guidance 19 - Outdoor Advertisement Control, especially in relation to MOL, Green Belt or designated nature sites.	Wording change	Policy revised to be in conformity with the NPPF.
3	020	2.22	Paragraph 2.22 of the draft DMP DPD confirms that the Council will apply policy on design considerations to all new development to respond to the local context. It is considered that this sentence should refer to all new development in areas of the Borough outside the IA.	This sentence should refer to all new development in areas of the Borough outside the IA.	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA
6	021	3	Supported, no specific comments.	None	Support Noted
10	022	3	Section 3 - Conservation and Heritage: Â In general The Pinner Association strongly agrees with the aims and aspirations of this section, especially paragraphs 3.2 and Policies 5, 6, 7, 8, 9, 10 and 11. Â In section 3.6 (third bullet point) hedges should be included as specific items for protection, as they are very important to the street scene in many Conservation Areas, and permission should be required for their substantive modification or removal. We support paragraphs 3.15 to 3.21 inclusive (protection for Locally Listed buildings), especially the clauses against the demolition. Â We strongly agree with the justifications in paragraphs 3.28 and 3.29.	Hedges should be included as specific items for protection	Support Noted Hedgerows are protected by legislation, much like TPOs.
12	085	Policy 5	Policy 5 (follows para 3.3) promises that the Council will continue to "identify and publicly document heritage assets". It would be helpful to indicate where this document is to be found, and its date; this should cover both nationally and locally listed buildings, complementing the assets already listed in the chapter.	Wording change	Clarification on where information can be found now included.

18	086	Policy 5	In general English Heritage welcomes the inclusion of a range of heritage policies within the Development Management document. However there are some concerns with regards to their structure, content, and consistency. Details of our concerns are set out below: Policy 5 seeks to set out the broad principles with regards to the conservation of heritage assets, supported by Policies 6-11 which provide more detailed guidance in relation to specific heritage types, supported by statements of justification. This approach is generally acceptable, however the structure of some of the policies and the justifications are not logical or consistent.	Structure of policies	This section has been re-written to address concerns following liaisons with EH and our Conservation Department
18	086	Policy 5	In the case of Policy 5 there are number of concepts which the text seeks to portray. Many of which reflect PP5. However the order of details discussed is not logical, plus there is a weighty reliance upon the need to consider PPS5. In order to provide clarity, capture the core principles of PPS5 and future proof against changes in national policy we would suggest that the following policy wording should be considered: The Council will seek to ensure the conservation and enjoyment of Harrow's heritage assets and wider historic environment. Proposals affecting any Heritage Asset in Harrow needs to:- i. enhance or better reveal the significance of the Asset or its setting; and ii. demonstrate an understanding of the significance of that Asset or its setting. This includes as a minimum reference to the Greater London Historic Environment Record (GLHER) or by a desk top analysis and reference to other documentation such as:- Â· Map regression (changes to historic maps over time); Â· Harrow Characterisation Study (2010); Â· Conservation Area Appraisal and Management Plans; Â· Harrow's List of Local Heritage Assets; and Â· Any other research source to the Heritage Asset affected. iii. describe the significance of the Heritage Asset in sufficient detail to determine its historic, archaeological, architectural or artistic interest to a level proportionate to its importance; iv. justify any damage to an asset and demonstrate the overriding public benefits which would outweigh the damage to the asset or its setting.	New Wording	This section has been re-written to address concerns following liaisons with EH and our Conservation Department

18	086	Policy 5	<p>The greater the damage to the significance of the asset, the greater the justification and public benefit that will be required before the application will gain support; and v. identify opportunities to mitigate or adapt to climate change and secure sustainable development through the re-use or adaption of Heritage Assets, to minimise the consumption of building materials and energy and the generation of construction waste. Where, as a result of implementing a consent, a new Heritage Asset is discovered, or the significance of an existing asset is amplified in a way that could not reasonably have been foreseen at the application stage, the developer will be expected to work with the Council to seek a solution that protects the significance of the new discovery, so far as is practical, within the existing scheme. Depending on the importance of the discovery, modifications to the scheme being implemented may be required. vi. encourage the maintenance, repair, restoration and reuse of heritage assets, especially those identified on the "Heritage At Risk"™ register. vii. identify and make positive use of heritage assets and their significance as a basis in which to stimulate environmental, economic and community regeneration. The above approach also helps ensure that climate change issues are addressed and that the Council demonstrates a commitment to heritage-led regeneration. These are issues which are stated clearly in PPS5 but not yet sufficiently covered in the draft Development Management document. In the case of the Justifications under para 3.3 it should be noted that Archaeological Priority Areas are not designated heritage assets.</p>	Policy re-wording	This section has been re-written to address concerns following liaisons with EH and our Conservation Department
19	087	Policy 5	<p>Â It is welcomed that Policy 5 includes a reference to the role that "enabling development" can play in ensuring the protection of existing heritage assets within the Borough. There are many examples whereby the funding to repair Listed Buildings to ensure their protection would not be available were it not for associated enabling development, and such opportunities should be properly considered. Whilst Policy 5 is supported, it is urged that the Council take a pragmatic and flexible approach when assessing enabling development proposals.</p>	None	Support Noted



3	088	Policy 6	Land Securities is of the view that it needs to be made clear that the policies within this chapter apply to the area of the Borough outside the IA only, and that the Harrow and Wealdstone AAP will include Development Management policies relating to conservation and heritage matters within the IA. Draft Policy 6 within the draft DMP DPD states, amongst other things, that "Proposals must preserve or enhance the character or appearance of a conservation area. Proposals for new development, alterations or extensions should therefore comply with the following criteria..." Given that Policy 6 specifically relates to Conservation Areas, it is considered that reference should be made within the text above to the fact that it refers to proposals for new development within Conservation Areas only.	IA not relevant	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA
18	089	Policy 6	Policy 6 lacks a clear statement of intent, in the vain that The Council will...'. Key issues which the Council could state is its commitment to continue to preserve and enhancement the special architectural or historic interest as expressed in the character or appearance of the conservation area, to ensure up to date conservation appraisals and management plans are in place, and undertake a programme of review of existing and potential designations. With regards to the existing text of Policy 6, the first part concerning the tests for conservation area designation, we would advise that this detail should be in the Justification and not in the Policy. The focus of this policy apart from setting out a broad commitment (as illustrated above) should be to help provide the tools in which to determine proposals within a conservation area. With this in mind we would advise that an explicit reference should be made to the relevant conservation area appraisal and management plan. These documents should help identify the significance of the designation and the appropriateness of the proposal without causing harm.	Policy 6 lacks a clear statement of intent. Re-wording.	This section has been re-written. Reference to Conservation SPDs and management strategies is included.
18	090	Policy 7	It is noted that there is no policy relating to locally listed buildings. Is this intentional? The concern is that Policy 7 refers to statutory listed buildings only, and that not including a specific policy to locally listed buildings provides a gap in the policy framework for the conservation of Harrow's heritage assets. We would advise that a policy should be included that helps capture the details of the Justification (para 3.15-3.21). To help draft the policy wording English Heritage recently published consultation draft on good practice guidance on this issue. Link below: <a href="http://www.english-heritage.org.uk/content/imported-docs/a-e/english-heritage-good-practiceguidance- for-local-listing-consultation-draft.pdf">http://www.english-heritage.org.uk/content/imported-docs/a-e/english-heritage-good-practiceguidance- for-local-listing-consultation-draft.pdf</a>	No policy on locally listed buildings.	New policy on Locally Listed Buildings included.

3	088	Policy 6	Land Securities is of the view that it needs to be made clear that the policies within this chapter apply to the area of the Borough outside the IA only, and that the Harrow and Wealdstone AAP will include Development Management policies relating to conservation and heritage matters within the IA. Draft Policy 6 within the draft DMP DPD states, amongst other things, that "Proposals must preserve or enhance the character or appearance of a conservation area. Proposals for new development, alterations or extensions should therefore comply with the following criteria..." Given that Policy 6 specifically relates to Conservation Areas, it is considered that reference should be made within the text above to the fact that it refers to proposals for new development within Conservation Areas only.	IA not relevant	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA
18	089	Policy 6	Policy 6 lacks a clear statement of intent, in the vain that The Council will...'. Key issues which the Council could state is its commitment to continue to preserve and enhancement the special architectural or historic interest as expressed in the character or appearance of the conservation area, to ensure up to date conservation appraisals and management plans are in place, and undertake a programme of review of existing and potential designations. With regards to the existing text of Policy 6, the first part concerning the tests for conservation area designation, we would advise that this detail should be in the Justification and not in the Policy. The focus of this policy apart from setting out a broad commitment (as illustrated above) should be to help provide the tools in which to determine proposals within a conservation area. With this in mind we would advise that an explicit reference should be made to the relevant conservation area appraisal and management plan. These documents should help identify the significance of the designation and the appropriateness of the proposal without causing harm.	Policy 6 lacks a clear statement of intent. Re-wording.	This section has been re-written. Reference to Conservation SPDs and management strategies is included.
18	090	Policy 7	It is noted that there is no policy relating to locally listed buildings. Is this intentional? The concern is that Policy 7 refers to statutory listed buildings only, and that not including a specific policy to locally listed buildings provides a gap in the policy framework for the conservation of Harrow's heritage assets. We would advise that a policy should be included that helps capture the details of the Justification (para 3.15-3.21). To help draft the policy wording English Heritage recently published consultation draft on good practice guidance on this issue. Link below: <a href="http://www.english-heritage.org.uk/content/imported-docs/a-e/english-heritage-good-practiceguidance- for-local-listing-consultation-draft.pdf">http://www.english-heritage.org.uk/content/imported-docs/a-e/english-heritage-good-practiceguidance- for-local-listing-consultation-draft.pdf</a>	No policy on locally listed buildings.	New policy on Locally Listed Buildings included.
3	023	3.14	Paragraph 3.14 of the consultation document notes that "retaining the original use of a listed building is important since this is most compatible with its character and fabric." It is considered that retaining the original use should be sought where possible or feasible	None	This section has been re-written to take into account concerns.

3	088	Policy 6	Land Securities is of the view that it needs to be made clear that the policies within this chapter apply to the area of the Borough outside the IA only, and that the Harrow and Wealdstone AAP will include Development Management policies relating to conservation and heritage matters within the IA. Draft Policy 6 within the draft DMP DPD states, amongst other things, that "Proposals must preserve or enhance the character or appearance of a conservation area. Proposals for new development, alterations or extensions should therefore comply with the following criteria..." Given that Policy 6 specifically relates to Conservation Areas, it is considered that reference should be made within the text above to the fact that it refers to proposals for new development within Conservation Areas only.	IA not relevant	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA
18	089	Policy 6	Policy 6 lacks a clear statement of intent, in the vain that The Council will...'. Key issues which the Council could state is its commitment to continue to preserve and enhancement the special architectural or historic interest as expressed in the character or appearance of the conservation area, to ensure up to date conservation appraisals and management plans are in place, and undertake a programme of review of existing and potential designations. With regards to the existing text of Policy 6, the first part concerning the tests for conservation area designation, we would advise that this detail should be in the Justification and not in the Policy. The focus of this policy apart from setting out a broad commitment (as illustrated above) should be to help provide the tools in which to determine proposals within a conservation area. With this in mind we would advise that an explicit reference should be made to the relevant conservation area appraisal and management plan. These documents should help identify the significance of the designation and the appropriateness of the proposal without causing harm.	Policy 6 lacks a clear statement of intent. Re-wording.	This section has been re-written. Reference to Conservation SPDs and management strategies is included.
18	090	Policy 7	It is noted that there is no policy relating to locally listed buildings. Is this intentional? The concern is that Policy 7 refers to statutory listed buildings only, and that not including a specific policy to locally listed buildings provides a gap in the policy framework for the conservation of Harrow's heritage assets. We would advise that a policy should be included that helps capture the details of the Justification (para 3.15-3.21). To help draft the policy wording English Heritage recently published consultation draft on good practice guidance on this issue. Link below: <a href="http://www.english-heritage.org.uk/content/imported-docs/a-e/english-heritage-good-practiceguidance- for-local-listing-consultation-draft.pdf">http://www.english-heritage.org.uk/content/imported-docs/a-e/english-heritage-good-practiceguidance- for-local-listing-consultation-draft.pdf</a>	No policy on locally listed buildings.	New policy on Locally Listed Buildings included.

18	091	Policy 8	<p>Policies 8 and 9 - Archaeology/Ancient Monuments There is a need to reconfigure these two policies so that they are logical in their order and intent. This includes the following: · Insert a statement of intent at the start of Policy 8, which demonstrates a commitment to secure the understanding of the historic assets of archaeological interest. In addition the park boundary of Pinner Deer Park, Pinner Park Farm is a pale not pole. · Combine and amend the Justification paragraphs so that they are logical in thought and clarification for the policies 8 and 9. Details of this are provided below: 3.23 3.22 Where proposals may affect Archaeological Priority Areas or other remains, the Council will expect sufficient information to be submitted by the applicant to assess the archaeological implications of development and may require an archaeological field evaluation prior to determination of the application. All planning applications involving archaeology will require the approval of English Heritage. An Archaeological Priority Area may not necessarily affect individual homeowners whose property falls within this designation however, it is advisable to check with English Heritage before commencement of any development. Major proposals will be assessed for their archaeological potential. Where proposals may affect Archaeological Priority Areas or other remains, the Council will expect sufficient information to be submitted by the applicant to assess the archaeological implications of development and may require an archaeological field evaluation prior to determination of the application.</p>	Reconfigure Policies	This section has been re-written to address concerns following liaisons with EH and our Conservation Department including the insertion of the statement of intent
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18	091	Policy 8	<p>Planning applications involving archaeology will require the approval of English Heritage. 3.24 Development where heritage assets of archaeological interest have been identified may be subject to mitigation measures in order to understand the asset. This might include field investigation or excavation and the analysis, dissemination and archiving of results. The Council will also encourage community engagement and involvement in any programme of archaeological work. 3.27 3.25 Scheduled Ancient Monuments in Harrow make a major contribution to the Borough's heritage and are the most important sites of archaeological interest. The desirability of preserving an Ancient Monument and its setting is a material consideration in the determination of planning applications. 3.26 The owner of a Scheduled Ancient Monument is responsible for the protection of that monument, although the Secretary of State for Culture, Media and Sport has ultimate responsibility for ensuring that its treatment, repair or use is compatible with its preservation as a monument. Anyone wishing to undertake works including farming operations, which would have the effect of demolishing, destroying, damaging, removing, repairing, altering, adding to, flooding, or covering up a scheduled monument must first obtain from the Secretary of State for Culture, Media and Sport 'Scheduled Ancient Monument Consent'. The execution of such works without the necessary consent is a criminal offence. Based on the existing draft paragraphs 3.22, 3.24 and 3.25 are proposed to be removed.</p>	Continued from above	This section has been re-written to address concerns following liaisons with EH and our Conservation Department
3	092	Policy 9	<p>Draft Policy 9 relates to Ancient Monuments. Headstone Manor is identified as a Scheduled Ancient Monument within the text of the policy. The draft Harrow and Wealdstone AAP consultation document identifies Headstone Manor within the AAP boundary and therefore Land Securities is of the view that consideration of this site should be through the AAP process.</p>	Clarification on documents	<p>Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA. Therefore it is necessary to include Headstone Manor in this policy.</p>

18	093	Policy 10	Policies 10 and 11 Both policies do not have at their beginnings a clear statement of intent from the Council. This could come in the form a commitment, in the case of Policy 10, to sustain and enhance the local distinctiveness of those places identified as Areas of Special Character. In the case of Policy 11, the Council could state a commitment to conserve and enhance the special character and appearance of the historic parks and gardens of special historic interest.	Policies 10 and 11 Both policies do not have at their beginnings a clear statement of intent from the Council	This section has been re-written, with a statement of intent included.
6	024	4	“ While overarching energy policies reside within the response to climate change section of the Harrow Core Strategy, these offer only limited detail for assessing specific development proposals. “ Policies within this DPD will be used to guide the assessment of proposed development across the borough, however, at this stage the DPD does not provide any specific energy policies, nor does it clearly cross-reference with Core Strategy or London Plan energy policies. The Council is advised that the current level of energy related policies established within this DPD would not be in general conformity with the London Plan. “ The Council should, therefore, establish energy policies for development management purposes, in conformity with the London Plan, within this DPD. GLA officers are willing to engage with the Council, if required, to facilitate the development of energy policies within this document, and would welcome early drafts of energy policy text to review and informally comment on before the Pre-Submission stage.	Establish energy policies in conformity with tLP.	Section re-written, including policies for de-centralised energy systems and renewable energy
10	025	4	“ Section 4 - Environment: “ We especially support Policies 14 and 15 (relating to river courses).	None	Support noted
13	026	4.1	We are pleased that PPS23: Planning and Pollution Control is included here. “ PPS25 should be mentioned in the introduction. We suggest the following change to the wording: “ "Having regard to the precautionary principle requirements of PPS23: Planning and Pollution Control; and PPS25: Development and Flood Risk, the council will consider the potential impact of development on the environment and flood risk."	Wording change	Policies amended to conform with NPPF

13	094	Policy 12	In the second paragraph the wording should be changed to read "that the risk of flooding is minimised whilst not increasing the risk of flooding elsewhere, and where possible reducing flood risk overall." This better reflect the overarching aims of PPS25 which are particularly important in this area as it is a largely built up catchment with existing urban areas in the flood plain. Â The second bullet point is good as it seeks to protect existing floodplain but the wording should be changed to also include a commitment to seeking opportunities to "restore ' functional floodplain through redevelopment. This is in line with Core Strategy Policy (CP1: u) which states that opportunities to enhance or reinstate functional floodplain on previously developed sites will be sought. Restoration of functional floodplain is also supported in Harrow's SFRA (section 5.1.3.2) and the River Crane CFMP. We suggest changing the wording to: Â "...either by impeding flow or reducing storage capacity and wherever possible restores functional floodplain."	Wording change	Policies amended to conform with NPPF and to include provisions for restoration of flood plains
13	027	4.2	The use of 'may' should be replaced with 'will' to be consistent with Flood Risk Policy 12. So that the sentence reads "proposals for development within the flood plain will be refused planning permission where they increase flood risk or conflict with the sequential approach to flood risk set in PPS25".	Wording change	Policies amended to conform with NPPF
13	028	4.4	We support this paragraph	None	Support noted
8	095	Policy 13	Â This policy is broadly supported, especially where sustainable drainage systems can be incorporated into schemes as part of landscaping proposals, providing priority Habitat creation such as flood-plains or wet woodlands.	None	Support noted
13	096	Policy 13	A stronger commitment to reducing run-off rates to Greenfield run-off rates should be made within this Policy to reflect the aims of the Core Strategy (Section 4.30) and recommendations in Harrow's SFRA and overall aims of Mayor's London Plan. Â In the Justification (4.5) reference is made to the use of SDS in accordance with the Mayors London Plan with an aim to control run-off to ensure that drainage from the site is consistent with that of a Greenfield site. This is good, but we think that a commitment to achieving Greenfield run off rates on existing Greenfield and brownfield development should be included in Policy 13. Â We recommend the following wording to be included as a separate bullet point: Â "All new development on both Greenfield or brown field sites will achieve Greenfield run-off rates through the use of SDS and rainwater harvesting."	Wording change	Policy re-worded to attach substantial weight to Greenfield run off rates, in line with adopted Core Strategy policy

15	097	Policy 13	We note that Policy 13 requires that all development proposals are required to demonstrate to the Local Planning Authority that Sustainable Drainage Systems have been incorporated into the design under the proposal. We note that in not all instances are Sustainable Drainage Systems able to be accommodated. All sites are different, and have differing existing ground conditions or existing infrastructure. It will be beneficial if Policy 13 could be specifically re-worded to include a reference to where Sustainable Drainage Systems cannot be included in development proposals that a clear justification is provided to accompany the proposals. This justification should include (but not restricted to) the site specific circumstances, what is reasonably able to be delivered, overall development viability, and other site specific practical or technical considerations.	Flexibility in the consideration of SDS in new developments.	Flexibility in measures to achieve a reduction in flood risk incorporated into policy
13	029	4.5	We are pleased with the wording in Section 4.5 that supports the use of SDS to achieve the SDS objectives highlighted in Harrow's SFRA. This will encourage the use of the most sustainable SDS techniques.	None	Support noted

3	098	Policy 14	With regard to the draft environmental policies within this chapter, it is considered that it needs to be made clear within the introductory text on page 32 that the subsequent draft policies apply to sites within the Borough outside the IA boundary. Draft Policy 14 seeks the protection of river corridors and watercourses. This policy states, inter alia, that all new development shall maintain a minimum 8 metre wide undeveloped buffer zone from all ordinary watercourses and designated main rivers within the Borough. There may be instances where the Environment Agency agree to a lower buffer zone (i.e. under 8 metres) and hence for flexibility, it is suggested that "unless otherwise agreed with the Environment Agency" is added to the text of the policy.	Clarification on IA.  Flexibility in buffer zone.	Justification amended to include buffer limit to be agreed by EA if not 8 meters
4	099	Policy 14	Â Policy 14 sets out that "all new development shall seek to make space for water". We have reviewed the justification for the policy and remain unclear on what the policy is seeking to achieve and what is required by 'all new developments', particularly as it goes on to discuss watercourses and Main Rivers. If this policy is to remain in the emerging DPD, we would recommend that it is reworded to provide developers with clarity on this issue and a degree of flexibility must be introduced. For example, we do not believe that the College Road site should make space for water given its town centre location.	Clarity	Policy re-worded for clarity
8	100	Policy 14	Â Natural England welcomes this policy especially in relation to the protection and enhancement of local biodiversity and wildlife corridors.	None	Support noted



13	101	Policy 14	We support this policy but suggest the wording within the policy could be strengthened to confirm that "...a minimum 8m wide undeveloped buffer zone measured from the top of bank (or outer walls if culverted) from all ordinary watercourses and designated Main Rivers..."	Wording change to strengthen policy	Unnecessary addition. Reasoned Justification is clear.
3	102	Policy 15	Draft Policy 15 confirms that in some instances, financial contributions may be appropriate towards the restoration of rivers. It is worthy of note that any planning obligations sought should meet the requirements of the three legal tests set out within Community Infrastructure Levy Regulation 122 which could usefully be referenced here.	Wording change to have regard to CIL	Unnecessary repetition of regulations. Planning Obligations policy sets out the tests.
4	103	Policy 15	Dandara agree that it is important that some proposals restore rivers where appropriate. This policy is not of direct relevance to our client's proposal for the College Road site. However, there remains a concern over the proposed wording of policy which sets out, "where proposals are considered to affect nearby watercourses or sites that are close to a river..". Policy 15 must be reworded to clarify what constitutes nearby' and close to a river' to provide landowners and developers of certainty on what is required of them in policy terms.	Clarification	Clarified that it is within a sites boundary
6	104	Policy 15	The content of this policy is broadly supported. However, the Council should ensure that the relevant measures in the River Basin Management Plan (draft replacement London Plan policy 5.14) and the River Restoration Action Plan (draft replacement London Plan policy 7.28) have been taken into account, and are appropriately reflected by this policy.	Management and Action Plans to be taken into account	Policy re-worded and now take this into account and are referenced in Reasoned Justification
8	105	Policy 15	À Natural England encourages the consideration of river restoration and deculverting, where appropriate, and we would also refer to our comments under Policies 13 and 14 above.	None	Support Noted
13	106	Policy 15	We are happy with this policy overall but would request to see a commitment to the restoration of the Wealdstone Brook included within the policy. The Wealdstone Brook is mentioned in the justification but not why it has not been included in the policy. À The Wealdstone Brook should be added as an extra bullet point or alongside the Edgware Brook as similar works are required.	Reference to Wealdstone Brook	Reference changed to refer to projects in Thames River Basin Management Plan and London River Restoration Action Plan.

13	107	Policy 16	We suggest the following wording change to this policy "All land proposed for use as/ previously used for industrial, utility, commercial uses or land where contamination is known or suspected will require a Preliminary Land Contamination Risk Assessment..." The above will make the policy in keeping with the precautionary approach of PPS23. Ensuring new developments with potentially contaminating uses are directed away from areas where groundwater is sensitive, to reduce the risk of future pollution.	Wording change	Preliminary Land contamination Risk Assessments will be required for all land known or suspected to be contaminated – which should cover the land types mentioned
13	030	4.10	This justification should refer to your Contaminated Land Strategy, which identifies and sets a plan to investigate sites that are likely to be significantly contaminated. By encouraging developers to redevelop these potential Part 2a CL sites, they will fall out of the legislative process (the resources for which currently lie upon the LA & EA with support from DEFRA). It is likely that land will be cleaned up faster and to a higher standard through the planning regime than through Part 2a of the EPA.	Refer to Contaminated Land Study	Reference included in Reasoned Justification
4	108	Policy 17	Dandara concur that all proposals for new development, redevelopment and conversions should achieve a high standard of water use efficiency. This requirement is already covered by other regulations such as Building Regulations, the Code for Sustainable Homes, BRE Environmental Assessment Method, etc. Policy 17 sets out that applicants should demonstrate that they have secured satisfactory provision with the relevant statutory undertakers and utility companies if a development necessitates increased capacity in the Borough's water supply and sewerage network. This is considered to be outside the remit of the LPA's planning function. All developers need to ensure that satisfactory infrastructure is in place to deliver development but such negotiations including costs / compensation to utility companies should remain confidential.	Policy not required	This issue is covered in the Core Strategy and has been removed from this DPD
13	109	Policy 17	We support this policy.	None	Support Noted
13	031	4.12	This paragraph should be amended to include ..... " ... Building a house to 105 litres per day will save 79 kg of carbon dioxide and 15 cubic metres of water per year, per house over and above the 2010 building regulations (125l/p/d). it is important ..."	Wording change	This information is included in the Reasoned Justification
13	032	4.13	BREEAM is a wide ranging assessment tool for commercial premises. 50% credits can be achieved whilst only gaining the minimum requirements in the water category. To prevent this, the paragraph should be amended to: "In order to ensure water efficiency	Wording change	Commercial requirements set out in London Plan and

4	108	Policy 17	Dandara concur that all proposals for new development, redevelopment and conversions should achieve a high standard of water use efficiency. This requirement is already covered by other regulations such as Building Regulations, the Code for Sustainable Homes, BRE Environmental Assessment Method, etc. Â Policy 17 sets out that applicants should demonstrate that they have secured satisfactory provision with the relevant statutory undertakers and utility companies if a development necessitates increased capacity in the Borough's water supply and sewerage network. This is considered to be outside the remit of the LPA's planning function. All developers need to ensure that satisfactory infrastructure is in place to deliver development but such negotiations including costs / compensation to utility companies should remain confidential.	Policy not required	This issue is covered in the Core Strategy and has been removed from this DPD
13	109	Policy 17	We support this policy.	None	Support Noted
			for non-residential proposals developments should seek to acheave at lease 5 credits of the possible water creadits available under BREEAM standards assessment."		so not replicated here.
4	110	Policy 18	Â Policy 18 sets out that applicants will be expected to submit a management plan to the local planning authority for approval for the removal and management of any problem non-native species discovered on or around land affected by the proposed development at any stage of the planning process. Â It is unreasonable of the Council to expect a developer or landowner to remove and manage a problem on land that is not owned or controlled by them. There are clear legal implications in respect of the current wording of policy. To make the policy sound, policy should be reworded to remove reference to 'around land'. Notwithstanding this, given the powers of the Council under other legislation, such a policy is considered superfluous and outside of the LPA's planning function.	Wording change. Policy not required	Policy deleted – as it overlapped with existing legislation and so was therefore superfluous.
13	111	Policy 18	We support this policy.	None	Policy deleted – as it overlapped with existing legislation and so was therefore superfluous.
14	112	Policy 18	We support this policy, though it should perhaps be made clearer that it is intended to apply only to plant species and not e.g. grey squirrels or harlequin ladybirds.	Wording change	Policy deleted – as it overlapped with existing legislation and so was therefore superfluous.

4	110	Policy 18	Â Policy 18 sets out that applicants will be expected to submit a management plan to the local planning authority for approval for the removal and management of any problem non-native species discovered on or around land affected by the proposed development at any stage of the planning process. Â It is unreasonable of the Council to expect a developer or landowner to remove and manage a problem on land that is not owned or controlled by them. There are clear legal implications in respect of the current wording of policy. To make the policy sound, policy should be reworded to remove reference to 'around land'. Notwithstanding this, given the powers of the Council under other legislation, such a policy is considered superfluous and outside of the LPA's planning function.	Wording change. Policy not required	Policy deleted – as it overlapped with existing legislation and so was therefore superfluous.
13	111	Policy 18	We support this policy.	None	Policy deleted – as it overlapped with existing legislation and so was therefore superfluous.
14	112	Policy 18	We support this policy, though it should perhaps be made clearer that it is intended to apply only to plant species and not e.g. grey squirrels or harlequin ladybirds.	Wording change	Policy deleted – as it overlapped with existing legislation and so was therefore superfluous.
13	033	4.18	We support this paragraph but suggest the that Exceptions Test should be Exception Test.	Wording change	Agree
13	034	4.19	We support this paragraph.	None	Support Noted
6	035	5	Supported, no specific comments.	None	Support Noted
3	036	5.1	The introductory text to this chapter (paragraph 5.1) confirms that the Council will seek to preserve and enhance areas of open space and promote the Green Grid through S106 contributions as part of new development. It is considered that it would also be beneficial to refer to opportunities for the reconfiguration of open space or provision of qualitative improvements at this juncture.	Wording change	Potential for reconfiguration of space included in Policy

8	037	5.1	Paragraph 5.1 refers to the preservation of open spaces and promotion of the Green Grid which is welcomed and encouraged, the Council should also seek to increase the provision of open space and biodiversity, where appropriate, and especially in areas of deprivation for access to nature. Â In respect of new development opportunities and in order to ameliorate issues of deprivation to access to open/green spaces the Council may wish to consider Natural England's ANGST (Accessible Natural Green Space standards), which should be referenced in the Core Strategy for the Borough and a link to this can be included within this document. Â Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system: Â No person should live more than 300 metres from their nearest area of natural green-space; There should be at least one accessible 20 hectare site within 2 kilometres; There should be one accessible 100 hectares site within 5 kilometres; There should be one accessible 500 hectares site within 10 kilometres.	Wording change	Disagree. The Council does not consider national ANGST standards to be applicable to a London Borough. Harrow's PPG17 study sets out appropriate local standards that seek to increase the provision of areas of nature conservation and natural and semi-natural green spaces.
10	038	5.1	We strongly agree with paragraph 5.1 and trust that this aim will be adhered to in all future planning decisions Paragraph 5.2 - any development should be very small and only allowed if absolutely necessary.	None	Support Noted

7	113	Policy 19	The RNOH welcomes this policy which acknowledges the national importance of the hospital and its contribution to the local economy. The Council has already recognised the very special circumstances relating to the redevelopment of the RNOH, which is proceeding in phases as a PFI scheme.	None	Support Noted
12	114	Policy 19	Policy 19 There should be a distinct policy for Metropolitan Open Land as opposed to Green Belt as it is generally more urban in setting and, for example, is more suitable for playing fields with modest buildings than the more rural Green Belt.	Distinction between MOL and Green Belt	Disagree. The Council considers MOL the same as Green Belt, as referred to in Para 5.5.

20	115	Policy 19	<p>Harrow Development Management Policies DPD - Consultation June 2011 Representation on Policy 19 Planning Policy Guidance Note 2 (PPG2) "Green Belts" sets out the Government's policy in respect of development within the Green Belt (GB). This includes setting out the five purposes of including land within the GB and the use of land within them, which include: To check the unrestricted sprawl of built up areas; To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To preserve the setting and special character of historic towns To assist in urban regeneration by encouraging the recycling of derelict or other urban land. There is a presumption against inappropriate development in the GB and the construction of new buildings is also inappropriate unless it is for one of five purposes including " limited infilling or redevelopment of major existing developed sites identified in adopted Local Plans, which meet the criteria in paragraphs C3 or C4 of Annex C [of PPG2]". Annex C confirms that GBs that contain Major Developed Sites (MDS) include (amongst other uses) research and education establishments. Paragraph C2 confirms that if a MDS is specifically identified, " infilling or redevelopment which meets the criteria in paragraphs C3 or C4 is not inappropriate". Paragraph C4 is most relevant to the Clamp Hill site given that it supports the complete or partial redevelopment of an MDS where it offers the opportunity for environmental improvements without affecting the openness of the GB and the purposes of including land within it. The land at Clamp Hill (shown on the plan Ref - BRS2430_01-1a which follows by post) is located to the north of Stanmore. The site is currently occupied by the Shaw Trust who provide a care service for adults with various kinds of disabilities and medical conditions. The site serves those who live within the Borough of Harrow and the surrounding areas of Brent and Barnet as well as those from further afield. Activities provided on site include a day care service, educational courses leading to an NVQ in horticulture a fully paid work placement, as well as employment in the garden maintenance and retail shop. Clients of the Shaw Trust are involved in all activities on site from growing and nurturing horticultural products to the retail sales in addition to the educational and learning facilities offered</p>	<p>It is suggested that the DPD identifies an additional MDS in the GB at the Clamp Hill site to enable limited and infill and redevelopment, in accordance with Annex C of PPG2.</p>	<p>It is not considered the site constitutes a strategic development site within the Green Belt (and it is not identified as such within the Core Strategy) but may still constitute a previously-developed site within the Green Belt as set out in the NPPF.</p>
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20	115	Policy 19	Initial pre-application consultation with the London Borough of Harrow in respect of the development of this site was undertaken in 2008 and, on the basis of the lawful operation currently taking place, the Council confirmed the use of the site as "commercial ". The activities take place within a number of buildings, which include a large double height industrial shed, permanent glass houses and other permanent outbuildings that facilitate the horticultural, educational and retail activities of the Shaw Trust. The Shaw Trust have been present on site for many years and the Clamp Hill site is their permanent location to provide special care for adults of all ages. The existing facilities have been developed in a piecemeal manner and the care services provided would be significantly improved if they were accommodated within modern, purpose built care facilities on this site. The Plan (ref BRS.2430_01-1a ) shows the footprint of the existing buildings on site and confirms that they extend to almost 1ha of the 3.8 ha site. Access is shown of Clamp Hill and the plan also confirms the significant belt of mature trees and other vegetation that surrounds the site and provides a sylvan setting for the existing buildings. Given the existing, lawful buildings on site and the contained nature of the site, the opportunity exists to provide modern facilities for a care use (which the Council have acknowledged is a commercial use), without harming the openness of the GB. As a result of the excellent screening of the site from all public vantage points, there is also the opportunity to provide new care facilities within a designated MDS to facilitate and supplement the existing use and provide additional care facilities within the Borough. It is therefore suggested that the DPD identifies an additional MDS in the GB at the Clamp Hill site to enable limited and infill and redevelopment, in accordance with Annex C of PPG2.		
7	039	5.7	As a Major Developed Site, the RNOH redevelopment proposals have already been tested according to the criteria set out in PPG2.	No requirement for further testing?	Disagree. For new development proposals, the test will still be applicable.
8	116	Policy 20	This Policy is strongly welcomed and the commitment to increase biodiversity is commended and encouraged. The Council may wish to amend to wording of this policy to indicate the Council seeks "opportunities to increase the biodiversity and wildlife with the borough as a whole"	Wording change	Support Noted.

10	117	Policy 20	Â We agree with Policies 20 and 21 but wonder how they would be enforced in practice on new developments.	None	Policy re-worded to state when applications will be refused
13	118	Policy 20	We support this policy.	None	Support Noted
3	119	Policy 21	Draft Policy 21 states, amongst other things, that "development should promote the enhancement, restoration and, where appropriate, re-creation of the natural environment through design." Each application for planning permission will be subject to individual site-specific circumstances, and hence, to provide sufficient flexibility, it is considered that "where possible" should be added to the text above.	Wording change	Flexibility added to policy
8	120	Policy 21	Natural England welcomes this policy, especially in relation to enhancing the potential for the borough as a whole, the wording used here could be used to strengthen the wording of Policy 20 above.	None	Support Noted
13	121	Policy 21	We support this policy.	None	Support Noted
8	122	Policy 22	Natural England would not be supportive of application within or adjacent to SSSI's which have an effect on their ability to function, and expects to be consulted and informed of any such developments as they arise.	None	Noted
14	040	5.14	It should be made clearer that the 2 SSSIs cover only parts of Bentley Priory and Harrow Weald Common. Moreover, it is our understanding that the latter site has this status because of its geological, rather than biological, significance.	SSSI clarification	The extent of these is shown on the adopted policies map.
12	123	Policy 23	Â Policy 23 ( follows 5.14), nature conservation - nebulous, feeble compare Policy 22, sites of special scientific interest, with its stronger wording bearing on national importance. Whilst recognising a distinction between national and lesser importance, it is difficult to comprehend the meaning of the vague "need for development". What kind of development might this be something so essential to the borough's social and economic welfare, that it can over-ride the value of the sites?.	None	Policy re-worded to ensure Biodiversity is protected or enhanced
3	041	5.15	Paragraph 5.15 of the consultation document states, inter alia, that "the Council will seek to ensure that development does not cause a net loss of biodiversity and will in particular resist proposals that will harm sites and species". It is considered that "without sufficient mitigation" should be added to the end of this sentence, to reflect the wording of Draft Policy 23, to which paragraph 5.15 relates.	Wording change	Reference to mitigation added re replacement.
3	042	5.16	Paragraph 5.16 of the draft DMP DPD notes that all development proposals should seek to enhance biodiversity through a range of measures. The appropriateness of	Wording change	There are potential solutions to enhance



12	123	Policy 23	<p>Â Policy 23 ( follows 5.14), nature conservation - nebulous, feeble compare Policy 22, sites of special scientific interest, with its stronger wording bearing on national importance. Whilst recognising a distinction between national and lesser importance, it is difficult to comprehend the meaning of the vague "need for development". What kind of development might this be something so essential to the borough's social and economic welfare, that it can over-ride the value of the sites?.</p>	None	Policy re-worded to ensure Biodiversity is protected or enhanced
			<p>requiring all development proposals to enhance biodiversity is queried, as this implies that all householder applications and minor developments will be subject to this requirement. Furthermore, to ensure a sufficient level of flexibility is inherent within the policy, it is suggested that "where possible" is added to the text of the policy.</p>		biodiversity for all types of applications, which should be considered – where possible is included in text.
3	124	Policy 24	<p>Draft Policy 24 concerns areas with features of nature conservation importance. The policy as currently drafted defines features including "hedgerows" as examples of nature conservation interests to which this emerging policy will apply. It is considered that the policy is too broad in its coverage and needs an element of pragmatism built-in. For example, the supporting text to the policy (paragraph 5.20) recognises that the Hedgerow Regulations 1997 protects important hedgerows of historical and ecological importance. It is considered that the text of the policy should reflect this, and refer instead to hedgerows of historical or ecological importance (rather than the generic "hedgerows" currently included).</p>	Wording change	Reference removed due to statutory protection
8	125	Policy 24	<p>These policies are welcomed. Under paragraph 5.22, Natural England welcomes the links between Health and Open space provision, as well as the other recognised benefits identified in this section. Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the Green Grid section of the Core Strategy. The London Landscape Framework can be found at: <a href="http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx">http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx</a> The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites.</p>	None	This is now covered by the Harrow Core Strategy
10	126	Policy 24	<p>Â Policy 24 is too weak - no new development that would have "a direct or indirect adverse impact upon features of nature conservation importance" should be allowed.</p>	None	Disagree. Natural England are satisfied with the policy.

12	127	Policy 24	Â Should 'railway corridors' be added to river and canal corridors?	Wording change	These are covered by Green Chains, and are specified in Harrow's Green Grid where appropriate
13	128	Policy 24	We support this policy but it could be improved by adding the following to the wording. "... that are lost. The area of compensation should be greater than that lost. Appropriate management ...." This is because habitat creation is not always as simple as planting the correct species. The new site will need time to establish it's self and may take a long time to be able to support the number of plant and animal species it is compensating for. Providing a larger site reduces the chance of failure and leads to a net gain in habitat as aspired to the Natural Environment and Rural Communities Act 2006, sec 40.	Wording change	Policy reworded to refer to equivalent value, to ensure the loss is made up for fully.
3	129	Policy 25	<p>Draft Policy 25 relates to open space and greenfield land. It is firstly considered that it should be made clear that this policy relates to these spaces in areas outside the IA. As currently drafted, the policy sets out a presumption against any net loss of public or private open space unless it can be demonstrated otherwise that there would be no adverse impact as a consequence of the loss of that open space. It is considered that the text of the policy should be expanded to recognise circumstances where reconfiguration, qualitative improvements, or the potential for alternative provision may be realistic options in the context of redevelopment opportunities.</p> <p>Draft Policy 25 goes on to note that proposals on open space [or greenfield land] or on land adjacent to it should have regard to criteria including "it is ancillary to the use of the open space or greenfield land or to any buildings on that land." It is considered that this text should be prefixed by the assertion "where the loss of open space has not been sufficiently justified..." for clarity. Furthermore, it is not considered reasonable to require land adjacent to existing open space to have regard to the specific criteria within the policy, as they are not subject to this designation.</p>	IA not relevant. Wording change	<p>Policy now allows for reconfiguration and qualitative improvements</p> <p>Ancillary uses covered by policy as revised. Harrow Core Strategy contains a presumption against the net loss of any open space. Policy amended to exclude land outside the designation.</p>

8	130	Policy 25	These policies are welcomed. Under paragraph 5.22, Natural England welcomes the links between Health and Open space provision, as well as the other recognised benefits identified in this section. Natural England has recently produced the London Landscape Framework which gives further guidance on the natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the Green Grid section of the Core Strategy. The London Landscape Framework can be found at: <a href="http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx">http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx</a> The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites.	None	This is now covered by the Harrow Core Strategy
10	131	Policy 25	Â Policy 25 - we disagree with the premise of this, as there would always be an impact from the loss of any open space, including gardens, and there should be a very strong presumption against any development on open space or greenfield land. No offsetting of the use of any open space or greenfield land should be allowed. No redevelopment of existing structures on any open space or greenfield land that exceeds the footprint of the existing structure should be allowed.	None	Harrow Core Strategy now contains a presumption against any loss of open space, which is reflected in this policy
12	132	Policy 25	Â (follows 5.21): do the square brackets in second and third lines imply any doubt about inclusion of the relevant text ? There should not be such a doubt.	Wording change	Reworded to avoid confusion.

19	133	Policy 25	<p>Â It is noted that within Policy 25 there is a presumption against any net loss of public or private open space. Whilst the principles of this policy are understood, Policy 25 is not supported in its current form . In situations where there is private open space which has no community amenity value, it is possible that proposed developments can in fact open up this space, with significant benefits. In these circumstances, where a net' loss of the space may result, a development could potentially ensure that the remainder of the space is opened up to become publically usable, with significant benefits, particularly in areas deficient in open space provision. In such circumstances, development should be considered. Designated 'Private Open Space' can potentially be contrary to the definition of Open Space in the Town and Country Planning Act 1990 which is defined as land laid out as public garden, or used for the purposes of public recreation. However, private open space is generally neither a public garden nor used for public recreation as it has no public access. Whilst the land has some amenity value by virtue of being open and grassed, there is no private law right in planning to a view. The provision of new publically accessible amenity greenspace as part of Harrow's "Green Grid" for the benefit of a new development dwellings and wider local community carry significant "community benefit". It is therefore recommended that an additional 'bullet point' should be added alongside those listed as considerations for development on open space, which reads along the lines of: "It results in net gain of publically usable open space in areas deficient of such existing space." There is also a strong objection to the comments within Paragraph 5.24 in respect of garden land . We welcome the apparent 'softening' of this approach since the recent Core Strategy consultation which appeared to propose a policy that would restrict any residential development on residential gardens. It is considered that such an interpretation of PPS3 is wrong, with the objectives and intent of the amended policy not being to restrict development that would otherwise be appropriate. Whilst it is acknowledged that gardens have been removed from the definition of previously developed land', there has been no changes to the fundamental and strategic policy objectives of PPS3, namely to achieve the efficient use of land, sustainable forms of development, good quality design and increase in the type, quantity and mix of housing (PPS3, Paras 9 and 10). It is therefore not the intention of PPS3 that there is a presumption against development, and it has since (post PPS3 amendment) been confirmed by Inspectors in determining a number of Planning Appeals that the restriction of appropriate residential development is not the intention of PPS3 policy. At the time of commenting on the Core Strategy, two recent examples of Appeal Decisions within the Borough of Harrow were enclosed in support of our objection of the policy. There should not be this presumption against development. As was demonstrated and proven with the comparative appeal cases, there can, in certain cases, still be development of garden land that is appropriate, where determined on its merits, the planning and housing objectives of PPS3 are met and taking into account other material considerations. Emerging policy should clearly not introduce " blanket protection " for residential gardens, nor mean that development of garden land is now fundamentally inappropriate or automatically unacceptable, nor an in principle presumption that development on garden land should be refused. Â The fact that a site may be garden land should not</p>	Too restrictive	<p>The Harrow Core Strategy contains a presumption against the loss of open space and of garden land, and so the policies in this DPD will be in conformity with that presumption.</p>
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21	134	Policy 25	<p>Policy 25: Open Space and Green Land This policy deals with the issue of development in garden space. Supporting text in 5.2.4 explains in what circumstances the policy is applied. This text should be expanded to refer to situations where flatted developments are demolished and re-built, often because the accommodation is outdated and doesn't comply with current standards or provide high quality accommodation. Such redevelopments can have an implication for communal garden areas (which may need to be reconfigured), but it is important that flexibility is applied in these circumstances to ensure that the most appropriate form of development can come forward, and that such sites re not unduly constrained. We suggest the following additional wording: "Redevelopment schemes involving, for example, existing blocks of flats, will often require a reconfiguration of communal garden space. Such schemes will be treated on their merits and and flexibility maybe applied as appropriate to ensure the optimum use of the land can be made and that development is not unduly constrained, whilst ensuring that appropriate levels of outdoor amenity space are provided."</p>	Wording change to allow flexibility	The Harrow Core Strategy contains a presumption against the loss of open space and of garden land, and so the policies in this DPD will be in conformity with that presumption.
3	043	5.22	<p>Paragraph 5.22 provides justification for Draft Policy 25. It states, inter alia, that "such spaces and greenfield land shall therefore be retained unless proposals adequately fulfil the criteria in policy, for consideration." It is considered, for the reasons noted above, that "...unless their loss is justified..." should be included after "...therefore be retained..." in the quoted text from paragraph 5.22.</p>	Wording change	The Harrow Core Strategy contains a presumption against the loss of open space and of garden land, and so the policies in this DPD will be in conformity with that presumption.
3	135	Policy 26	<p>Draft Policy 26 concerns sport and recreation. It is considered that it should be made clear that this policy relates to sport and recreation on sites outside the IA. It is also considered that the text of the policy would benefit from amendment to read "The Council will seek proposals for new sports, leisure and cultural facilities and the replacement or enhancement of existing facilities where appropriate, having regard to need/usage and local standards..."</p>	IA not relevant Wording change	Policies amended to include criteria on need. Standards for provision are contained in Harrow's PPG17 study.

22	136	Policy 26	Â Policy 26 - Sport and Recreation Support with amendment Sport England welcomes the inclusion of Policy 26 - Sport and Recreation. However, within Appendix E: Evidence Base and Strategies of Harrow's Core Strategy reference is made to the Harrow PPG17 Open Space, Sport and Recreation Study 2011. Therefore reference needs to be made to the Harrow PPG17 Open Space, Sport and Recreation Study 2011 in order to demonstrate that there is an evidence base that supports the policy.	Reference to PPG 17 study	Reference to this study is now included.
10	137	Policy 27	Policy 27 - we disagree with this policy as no development of actively used allotment sites should be allowed (it is impossible to "relocate" an allotment into which years of effort has been expended). If it is deemed that an allotment site is no longer in sufficient use then it should revert to a public open space.	No loss of allotment	The Harrow Core Strategy contains a presumption against the loss of open space and of garden land, and so the policies in this DPD will be in conformity with that presumption
8	138	Policy 29	Â Natural England commends and encourages the Council in requiring details of potential effects on biodiversity to be demonstrated in such applications.	None	Support noted
12	139	Policy 29	( follows 5.27), the justification, in 5.28 should be strengthened by inserting "only" after "permitted" in the first sentence.	Wording change	Policy re-worded
13	140	Policy 29	We support this policy.	None	Support noted.

6	044	6	The Mayor's draft replacement London Plan recognises that there may be scope for a more dispersed distribution of student accommodation in London. On this basis, the Council should consider whether it would be appropriate to include a policy for the promotion of student accommodation within this DPD. Whilst the Mayor is not proposing a specific student accommodation benchmark for Harrow the draft replacement London Plan, the borough is accessible to parts of central London, and could provide a suitable location to help maintain London's status as a world city for higher and further education. GLA officers would welcome the opportunity to discuss this matter with the Council if required. The Council may also wish to consider how student accommodation would contribute to mixed and balanced communities.	Consideration of student accommodation	Not required. In liaison with the GLA in the development of the SHLAA, this subject was not raised.
8	045	6	Natural England has no substantive comments to make on this chapter, however, we refer to our earlier comments with regards to ANGST standards above.	None	None

10	046	6	We support paragraphs 6.5 and 6.14, and strongly agree with Policies 30, 32 and 33. For the amenity of the future residents there should be a presumption against the development of high rise flats, particularly as social housing. There is no discussion of the quality of build required for either social or affordable housing developments. The Council should require developers to provide schedules of all materials to be used as well as full plans showing the structure to ensure the safety of the future residents. In particular, timber frame types of construction can lead to an increased risk in the case of fire.	Design emphasis	Considered under Policy 1
12	047	6	Should Government policy on conversion of office space to residential uses (announced alongside the 2011 Budget ) be acknowledged ?	DCLG Commercial to Residential consultation consideration	New policy to deal with this issue
6	048	6.1	The commitment to provide a range of housing within the borough, including for students, people on low incomes, families, people with disabilities or special needs, the elderly and sites for gypsies and travellers is supported. Regarding the latter however, it is noted that this DPD does not set out a development management policy for dealing with applications for gypsy and traveller sites. The Council are, therefore, advised to include such a policy within the Housing chapter of this DPD, or, to provide a cross-reference with Harrow Core Strategy Policy CS1, point Y.	Gypsy Traveller policy? Or Cross reference	Reference to Core Strategy policy CS1 Y now included.
3	049	6.3	Paragraph 6.3 of the draft DMP DPD confirms that "there are many sites outside of the Intensification Area that will come forward for residential development in the future and it is on these sites that the following policies will be of relevance." Land Securities welcomes this explicit acknowledgement.	None	None
11	050	6.4	Chapter 6. 6.4 Space standards should be more flexible, with scope for variations in individual circumstances (eg some town centre flats over shops, student accom, etc). Replace 'minimum' with 'indicative' as recommended in the recent London Plan EIP report (para 3.70). The approach needs to be properly justified for Harrow. 6,5 Given the wider housing need and shortage, it is unreasonable to restrict family housing in Harrow to such limited locations.	Flexibility over space standards	Disagree. Standards now adopted in the London Plan

3	141	Policy 30	Draft Policy 30 and Draft Policy 33 both refer to a preference for sites with high accessibility levels. It is considered that the text of these policies should instead refer to sites that are, or that can be made, accessible.	Wording change regarding accessibility.	Policies amended and reference removed
4	142	Policy 30	The general policy direction is welcomed by Dandara in terms of the sequential approach which encourages new housing proposals on previously-developed land on sites with high accessibility to public transport facilities. However, there is a concern that Policy 30 seeks all new housing developments to provide "an appropriate mix of housing types, tenures and sizes [and where appropriate include affordable housing and special needs housing]". Our review of the housing market in Harrow supports the statement that younger professionals will be attracted to new housing in the town centre. Given this, the proposed residential-led mixed use scheme for the former post office site will appropriately comprise flatted units. Policy 30 could be read that a wholly flatted development would not be compliant. We are of the opinion that the policy should be reworded to ensure flexibility on the housing types proposed and importantly ensure the best use of previously developed land. Â With regard to affordable housing, Dandara welcome that Policy 30 acknowledges that affordable housing is not appropriate in all locations through the statement "where appropriate [new housing developments] include affordable housing". We are of the view that to enable the delivery of the objectives of the Intensification Area, emerging policies should allow some sites to come forward without making provision for affordable housing. Furthermore, it is our understanding that the affordable housing requirement in Harrow is for larger family homes instead of flatted properties. Â The College Road site is a tightly constrained site in Harrow Town Centre where the residential element of the proposal will comprise flatted units in order to maximise the potential of the site and to provide for the identified need amongst younger professionals. With this being the case, it is suggested that any proposal would be better placed to contribute various other planning benefits such as improvements to Station Road, a library, or civic amenity, transport improvements, etc as opposed to delivering affordable housing in a form that is not needed. This notion appears to be supported by officers but should be reflected in emerging policy documents.	Feasibility and flexibility of housing mix in all developments.	New housing mix policy has been added and flexibility is incorporated. Harrow's Core Strategy allows for other planning benefits to be considered and the London Plan allows for off site affordable housing provision where not feasible on site.



6	143	Policy 30	Notwithstanding the comment above, the reference to minimum residential space standards in the draft replacement London Plan is supported. For clarity, the Council may wish to include the full London Plan policy citation: "Policy 3.5" and "Table 3.3" . The Council should identify the requirement that 100% of new houses must meet Lifetime Homes standards, and that a minimum of 10% should be wheelchair accessible. While officers note that reference to these standards is made in other parts of Chapter 6 (primarily in relation to homes in multiple occupancy, and care homes) this should also be reflected in the Council's "New Housing" policy. The Council may simply provide a cross-reference to Core Strategy policy CS 1, which identifies these requirements.	Wording change to emphasise space standards and Lifetime Homes and wheelchair housing requirements.	These standards are now referenced and also included in the Core Strategy
6	144	Policy 30	The Council should clearly cross-reference this policy with Core Strategy policy CS 1, which sets out the 10 unit threshold for affordable housing policy, as well as the Council's 40% affordable housing target, and the approach toward seeking the maximum reasonable amount of affordable housing on individual sites. The GLA supports the Council's intention of applying a sequential approach for the location of new housing development, including a preference for brownfield sites. The Council are, however, advised to consider whether the wording of the line, within the policy box, on page 51: "The Council shall only consider land on the edge of the urban area that is close to public transport and local services" may prove to be overly restrictive at the point of policy implementation. It also may not take into account any planned future improvements or upgrades to local infrastructure. The GLA welcomes the reference to Harrow's Residential Design Guide SPD 2010 within Policy 30. However, while the desire to keep the Development Management Policies DPD as concise as possible is acknowledged, officers would expect to see further detail on residential design standards set out within this DPD. The Council should have regard to draft replacement London Plan policy 3.5, and the Mayor's Housing SPG (EiP Draft), and include policies within this DPD that seek the highest quality residential design for the borough.	The Council should clearly cross-reference this policy with Core Strategy policy CS 1	Policies amended to include references. Design criteria are set out in Policy 1.
7	145	Policy 30	The RNOH Trust objects to the wording of draft Policy 30, which advises that the Council shall only consider housing on the edge of the urban area that is close to public transport and local services. The Council should recognise that development proposals for housing on the edge of the urban area are appropriate when they include a suitable package of mitigation measures to improve public transport and local services.	Objects to wording. Should consider housing on edge of urban area if they include improvements to public transport and local services	Policy added to deal with major developed sites in the green belt. Strategy for managing the distribution of growth is set out in the Core Strategy.

11	146	Policy 30	Policy 30. The mix requirement should only apply to larger schemes. Conversions and smaller sites will be constrained by other factors. The long-standing fig of 120 sq m needs to be reconsidered and justified in relation to current needs. Given the wider housing need and shortage, and the need to exceed targets, it is unreasonable to impose a sequential approach to housing provision, at least in this form. The penultimate sentence should be deleted. It is unreasonable to exclude otherwise acceptable housing development within the Greater London settlement boundary solely because it is not close to public transport and services.	Housing mix not always feasible. Unreasonable to impose a sequential approach to housing provision and if they are not close to public transport or services.	Strategy for managing the distribution of growth is set out in the Core Strategy and so this section has been removed.
19	147	Policy 30	Â Whilst there is no objection to the general objectives for housing in Policy 30 , we object to the comment at the end of the Policy stating "the council shall only consider land on the edge of the urban area that is close to public transport and local services". Whilst such a consideration may be appropriate for larger housing developments, small-scale proposals for new housing should not be automatically precluded as a result of location. Policy 30 is supported . As a result of the ageing population, there will continue to be a growing demand for elderly care home facilities, and these should be encouraged in appropriate locations.	Location should not define housing acceptability	Strategy for managing the distribution of growth is set out in the Core Strategy and so this section has been removed.
23	148	Policy 30	In line with London Plan policies there should be some support for Live/Work units as per the previous UDP which said 'The Council encourages the development of work/live units; that is low cost, small workshop or office floorspace with ancillary, integral living accommodation'. This is cosidered a highly sustainable concept but one which seems to have dropped off the radar?	In line with London Plan policies there should be some support for Live/Work units	Live /work units are no longer supported in tLP.
24	149	Policy 30	Workspace agrees that a mix of housing types should be sought within residential developments. Workspace also agrees that a housing mix is prescribed in this policy. Paragraph 23 of PPS3 states that developers should bring forward proposals for market housing which reflect demand and the profile of households requiring market housing, in order to sustain mixed communities. Therefore, the housing mix should be considered on a site by site basis.	None	Housing Mix policy is flexible to allow for site specific circumstances to be considered

25	150	Policy 30	<p>We are supportive of the Council's approach to prioritise the development of previously developed land but object to the sequential approach being proposed for the following reasons: The sequential approach would favour the redevelopment of existing housing sites in the first instance, this makes the assumption that all existing housing sites are more sustainably located than other previously developed land; This approach will compound existing problems on unsustainably located housing sites and delay suitable redundant/derelict sites coming forward; The sequential approach is not an effective development control tool as land owners often only have a single site available for development. If other sites are considered to be sequentially preferable but are not within the applicant's control it cannot be assumed that these sites will come forward for redevelopment; It is suggested that the sequential approach be set aside and the policy be amended to read: Policy 30 - New Housing "New housing developments [including conversions], shall have regard to the following criteria: They shall seek to provide an appropriate mix of housing types, tenures and sizes [and where appropriate include affordable housing and special needs housing]; and If converting a single dwelling house, the original internal habitable floor area is more than 120 sqm and has at least 5 habitable rooms. The preferred location for housing is on previously-developed land. The following sites will be considered acceptable for residential development in principle: Sites with high accessibility to public transport facilities; Redevelopment of existing housing sites at higher densities where appropriate; Re-use of buildings, including empty properties; or Redundant / derelict sites. The Council shall only consider land on the edge of the urban area that is close to public transport and local services. Proposals involving residential development shall take account of the requirements set in the Residential Design Guide SPD 2010 ."</p>	Object to sequential approach. Wording change	This policy has been amended. Approach to site selection is a strategic matter and is covered in Harrow's Core Strategy.
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26	151	Policy 30	<p>Â - ROYAL MAIL DEPOT, ELMGROVE ROAD, HA1 2ED Â We act on behalf of RC Watson &amp; Co Ltd (owners of the above site) We are supportive of the Council's approach to prioritise the development of previously developed land but object to the sequential approach being proposed for the following reasons: The sequential approach would favour the redevelopment of existing housing sites in the first instance, this makes the assumption that all existing housing sites are more sustainably located than other previously developed land;Â This approach will compound existing problems on unsustainably located housing sites and delay suitable redundant/derelict sites coming forward; Â The sequential approach is not an effective development control tool as land owners often only have a single site available for development. If other sites are considered to be sequentially preferable but are not within the applicant's control it cannot be assumed that these sites will come forward for redevelopment; Â It is suggested that the sequential approach be set aside and the policy be amended to read: Policy 30 - New Housing Â "New housing developments [including conversions], shall have regard to the following criteria: Â They shall seek to provide an appropriate mix of housing types, tenures and sizes [and where appropriate include affordable housing and special needs housing]; and If converting a single dwelling house, the original internal habitable floor area is more than 120 sqm and has at least 5 habitable rooms. The preferred location for housing is on previously-developed land. The following sites will be considered acceptable for residential development in principle: Â Sites with high accessibility to public transport facilities; Redevelopment of existing housing sites at higher densities where appropriate; Re-use of buildings, including empty properties; or Redundant / derelict sites. Â The Council shall only consider land on the edge of the urban area that is close to public transport and local services. Proposals involving residential development shall take account of the requirements set in the Residential Design Guide SPD 2010 ."</p>	Object to sequential approach. Wording change	This policy has been amended. Approach to site selection is a strategic matter and is covered in Harrow's Core Strategy.
6	051	6.9	<p>The Council may wish to reword this paragraph. While the essence of seeking a variety of housing types, and supporting mixed and balanced communities is supported, the phrasing "create a sense of balanced and mixed communities" presents challenges in terms of its definition. The Council may wish to remove the reference to "sense" to make the statement more tangible.</p>	Wording change	Wording amended

6	152	Policy 31	With regard to the second bullet, and the reference to instances where "it is not possible to achieve the required quality of provision through redevelopment without a net loss of residential units" , the Council are advised to identify the circumstances where this would be "not possible" . This may be outlined within the supporting policy text.	Clarity required on circumstances where it is not possible to achieve required quality of provision without loss of residential.	This policy has been amended – reference to loss of quality removed.
14	153	Policy 31	The first sentence does not read properly. Could it perhaps be rephrased along the following lines: The Council shall resist proposals involving the net loss of the number of residential units including any net loss in the number of affordable housing units and shall only consider redevelopment involving such loss under the following circumstances :	Wording change	Policy revised
11	154	Policy 32	It is unreasonable to provide play facilities on-site for 'one or more additional units' . Individual purchasers of houses with private gardens should be able to make their own provision and choice of play equipment. Contributions are unnecessary in these and other cases.	Wording clarification	Contributions will be required where a development results in a net increase in child yield. Off site provision may be acceptable. Policy revised.
15	155	Policy 32	We note that Policy 32 requires that where there exists the creation of at least one or more additional units, it is expected that provision is made on site for children and young peoples' play space facilities (alternatively a financial contribution towards facilities in the local area will be sought). There is no recognition in this policy (or the post text justification) as to the fact that not all housing typologies will cater for children or young people, or indeed give rise to this requirement. A For example, a one bed flat in a town or district centre location is not likely to generate accommodation suitable for children. Similarly, accommodation for the elderly too, would not. This policy therefore does not seem to be appropriate to the type of development proposed, and we will therefore suggest amending the policy to reflect (discount) suitable typologies that would not ordinarily trigger the occupation for children. Similarly, the policy must be cognisant of site specific considerations, locational considerations (such as where these are in areas of good open space provision), and matters of viability. Again, this policy should be flexible enough to respond and facilitate development opportunities, rather than become an obstacle to development.	Wording clarification	Contributions will be required where a development results in a net increase in child yield. Off site provision may be acceptable. Policy revised.

21	156	Policy 32	Policy 32: Children and Young People's Play Facilities This policy states that proposals which result in the creation of one additional unit will be required to provide on site play space. the Mayors SPG on Children and Young People's Play and Informal Recreation (2008) determines requirements based on child yield. This is the correct approach since some residential units (such as small units) or housing aimed at a particular sector of society, will not generate a child yield, an so should not be obliged to contribute to play facilities. the policy text should be amended to state that: "New residential proposals which result in a net increase in child yield will be expected to provide..."	Link to Mayor's SPG	Contributions will be required where a development results in a net increase in child yield. Off site provision may be acceptable. Policy revised.
6	157	Policy 33	In addition to sheltered housing and care homes, the Council are also advised to indicate their support for extra care housing, across all tenures.	Wording change	Policy amended to include Extra Care Housing
11	052	6.18	6.18 - 67.19 HMOs by their very nature are highly unlikely to be able to comply with the minimum or 'indicative' space standards now included in the RDG and set out in the draft revised London Plan. The figs are pitched so high that they will inevitably rule out most, if not all, HMOs. There should also be more flexibility in the application of Lifetime and Accessible Homes standards.	Flexibility request	Disagree. Space standards should accord with tLP and RDG. Likewise with Lifetime and Accessible Homes standards should also be complied with to ensure good quality accommodation that is also accessible.

3	053	7	<p>It is noted that there are a number of references to Harrow Metropolitan Centre and its role throughout this chapter. Land Securities is of the view that Harrow Town Centre should be considered through the AAP process that is currently running concurrently with the DMP DPD. It should also be made clear that the employment policies and designated areas (e.g. Industrial Business Use Areas) within the DMP DPD refer only to sites outside the IA, and that employment and economic development within the IA (including consideration of sites including Kodak) will be considered through the emerging Harrow and Wealdstone AAP. Paragraph 7.5 within the draft DMP DPD states that the Council will support the Borough's economy by protecting existing employment floorspace. It is considered that a better and more flexible approach would be to maintain sufficient employment floorspace, and that the text within paragraph 7.5 should be revised to reflect this.</p>	<p>Wording change. Reference to sites within IA.</p>	<p>Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.</p> <p>Policy amended to include release criteria</p>
7	054	7	<p>This section fails to recognise the contribution of public sector employment to the economy of the Borough. The RNOH is one of the largest single employers in the area: its redevelopment and retention will have significant effects for employment provision and for the stimulation of the local economy.</p>	<p>Public sector employment recognition</p>	<p>RNOH site allocated for continued employment use in the Site Allocations DPD</p>

15	055	7	<p>We note from recent review, and our simultaneous representation submitted to the Harrow and Wealdstone Area Action Plan Consultation, that at paragraph 7.3 reference is made to the London Plan designated Strategic Industrial Locations which includes the local designation of the Wealdstone Industrial Area as a "Preferred Industrial Location". Paragraph 7.3 goes on to identify Honeypot Lane in Stanmore as an identified "Industrial Business Park". The last sentence of paragraph 7.3 advocates that other smaller industrial sites across the borough are defined as "Industrial Business Use Areas". There appears to be no reference in Chapter 7 of the fact that the Harrow and Wealdstone Area Action Plan is being prepared to be directly and specifically responsible for setting policies within the intensification area. This should be included. We note that Policy 35 is the first employment and economic development policy proposed and this deals with "Industrial Business Use Areas". As discussed above these are defined as other smaller industrial sites across the borough. There appears to be no policy to control development on either "Industrial Business Park" or the "Preferred Industrial Location" as defined. From discussions with officers, the Wealdstone Strategic Industrial Location (referred to as the Wealdstone Preferred Industrial Location in the UDP) was designated by the GLA as a Strategic Industrial Location (SIL) in the London plan, and based on interpretation of the GLA designation, currently includes various industrial sites in Wealdstone including; British Rail Goods Yard, Barratt Way Industrial Estate, Christchurch Industrial Estate, Cliveden Centre, Crystal Centre, Hawthorn Centre, Kodak Site, Palmerston Road, Rosslyn Crescent, Waverly Industrial Park, Whitefriars Industrial Estate and the ColArt Site. From recent discussion with Officers at your Council, we have been advised that the GLA has recently reviewed/reassessed the SIL's in the London Plan and consider the Wealdstone SIL requires amendment and that the Council is being encouraged to review their Wealdstone Preferred Industrial Location accordingly - through the Area Action Plan (to now only designate the Kodak Site and the Waverley Industrial Estate). We consider that the AAP represents the perfect opportunity to review the Wealdstone Preferred Industrial Location, and agree that the amended boundary should reflect the recent discussions with the GLA regarding the SIL. We consider that the review should be evidence led and have regard to the findings of the employment land review which ranks the Industrial Sites within the borough including those sites contained within the Wealdstone Preferred Industrial Location in order of quality of employment land and space. Those sites which rank highly should obviously be given priority over those sites which rank policy. Officers have advised that this issue will be considered in the second round of consultation on the Area Action Plan which is expected towards the end of this year, and we suggest that this approach is carried through in tandem in the Development Management DPD, given that these two DPD's are inextricably linked.</p>	Reference to IA. Policies to be specific.	Policies revised to cover all types of employment land. SIL designation revised as part of the Area Action Plan revision.
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3	158	Policy 35	Draft Policy 35 and its supporting text within paragraphs 7.11-7.16 relates to Industrial and Business Use Areas as defined on the Proposals Map. It is considered that it should be made clear within both the policy and the accompanying text that both relate only to sites within the Borough outside the IA boundary.	IA not relevant	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.
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5	159	Policy 35	<p>Policy 35 - Industrial and Business Use Areas This policy sets out those uses which will be considered appropriate within Industrial and Business Use Areas. The MPA/S have identified the potential of relevant employment sites in helping them meet the goals of their estate strategy. In particular, the provision of patrol bases, custody centres and relevant pan-London policing facilities are vital to the successful implementation of the MPA/S' estate strategy. The nature of these uses are similar to that carried out on most employment sites and therefore are ideally suited to employment sites and similar locations. Whilst falling outside the 'B' Use Class definition, these policing facilities are employment-generating uses. Generally the policing uses represent no material alteration from an Employment (B1) or Warehousing (B8) use as they possess an employment density similar to or in excess of 'B' Class uses. Vehicle movement will also be similar to a typical employment/industrial use. These facilities do not require continued public access and therefore have no requirement to be located in town centre areas. This approach is supported by the strategic development plan within Policy 3B.4. 'Industrial Locations' which states that policies in DPD's 'should develop local policies and criteria to manage industrial sites having regard to helping meet strategic and local requirements for... social infrastructure.' Furthermore, Policy 2.17 of the Emerging London Plan defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations. Mindful of the above and in order to comply with strategic policy in this regard, reference should be made within Policy 35 to the provision of other employment-generating uses as appropriate alternative uses on employment sites. The MPA/S therefore recommend that an additional bullet point be added to Policy 35 as follows (additional wording underlined):- <u>Where employment densities are similar to existing, Industrial and Business Use Areas may also accommodate alternative employment-generating uses, including facilities for emergency services.</u></p>	Reference to the provision of other employment-generating uses as appropriate alternative uses on employment sites.	Provision for essential infrastructure is supported through the Core Strategy. Policy amended to reflect this. The London Plan also supports the use of industrial land for emergency services uses.
6	160	Policy 35	<p>The content of this policy is supported. However, the Council should clarify whether it is the intention of this policy to cover Strategic Industrial Locations (SIL) and local industrial / business areas, or, only the local ones. The GLA would not object to the Council using draft replacement London Plan policy 2.17 to deal with SIL, however, adequate cross-referencing must be provided to inform the reader of this.</p>	Clarification required.	Policy revised to incorporate all employment land.

24	161	Policy 35	<p>Workspace supports the proposed uses within industrial and business area, however, it is considered that this policy fails to reflect a number of key economic areas and is consequently not flexible to meet the economic needs of this part of outer London. The issues that should be raised within this policy are considered below: Small and medium sized enterprises It is recognised that small and medium sized enterprises are referred to in the supporting text, however, the actual policy does not reference them and its rigid approach to economic development fails to understand the markets in which small and medium sized enterprises work within. Consequently, small and medium sized enterprises should be actively encouraged in such locations. However, for this policy to be successful it will need to: take account of the locational needs of these enterprises; regeneration opportunities afforded by such enterprises; and how employment space for these enterprises could be delivered. Small and medium sized enterprises provide an important and significant contribution to the Outer London and Harrow economies. The potential economic and social benefits of promoting the development of small and medium enterprises include: The creation of jobs at low cost of capital; Contribution to the Gross Domestic Product (GDP); Expansion of the entrepreneurial base; Flexibility to adapt to market changes; Support for large scale enterprises; Entry into market niches which are not profitable for larger enterprises. All the above may never be fully realised if such enterprises are not encouraged throughout the borough including on industrial and business use area. Small and medium sized enterprises often operate within clusters and networks. Networking allows the small and medium sized enterprises to combine the advantages of smaller scale and greater flexibility with economies of scale and scope in larger markets - regionally, nationally and globally. The links take different shapes in which different firms join together to co-produce, co-market, or co-purchase, cooperate in new product development, or share of information. It is important that these clusters and networks are supported and developed by the provision of appropriate accommodation at a variety of locations. Small and medium sized enterprises have an important role in leading entry into emerging sectors that do not necessary fit comfortably within the traditional planning use classes. It is important this policy flexible to encourage the economic development of small and medium sized enterprises regardless of use class. For example, small and medium sized enterprises are particularly strong in developing the art and cultural sectors, which struggle to find suitable premises due to planning land use class restrictions. Such enterprises often have to compete with Class A occupiers, which prevents their development on cost grounds. This space is often not appropriate and the planning use class system is too rigid in which to support their growth. Enabling Development This policy is not flexible and does not take account of the future economy and potential for future economic development. As currently written, this policy is ineffective and could prevent land from being utilised for more effective land uses. This policy should allow the redevelopment of inefficient employment areas for mixed-use developments that incorporate modern and flexible employment floorspace for small and medium sized enterprises. New employment floorspace will help sustain existing employment use at such sites and enables sufficient flexibility and building quality to secure its continued use in the longer term. This will provide benefit in</p>	<p>Not flexible to meet the economic needs and to support SMEs.</p> <p>This policy should allow the redevelopment of inefficient employment areas for mixed-use developments that incorporate modern and flexible employment floorspace for small and medium sized enterprises</p>	<p>New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amenity</p>
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24	161	Policy 35	<p>CONT... thriving markets. To regenerate under-used and inefficient employment floorspace a higher-value use is often required to enable development. The associated higher-value land use as part of a mixed-use development will secure the delivery of this employment floorspace. Without this higher value element, the redevelopment would be unviable. This approach can deliver increased economic efficiencies by increasing the economic output of an area and can also deliver much needed housing. Workspace have successfully adopted this approach at variety of sites across London. This approach is also consistent within national planning policy set out in the Ministerial Statement dated 23rd March 2011 and PPS4. The Ministerial Statement seeks to promote jobs and economic growth and it is stated that the Government's clear expectation is that the answer to development and growth should wherever possible be 'yes'. This Ministerial Statement goes on to state that when deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing. PPS4 and the Ministerial Statement both state that in determining planning applications, local planning authorities are required to ensure that they give appropriate weight to the need to support economic recovery and that applications that secure sustainable growth are treated favourably. It is therefore clear that the Council should support proposals that would increase economic output, support the development of small and medium sized enterprises and increase housing supply. It is also worth noting that the Government has published a detailed consultation paper, "Relaxation of planning rules for change of use from commercial to residential". The aim of the proposals are to remove the need to make planning applications for changes of use of premises from business and possibly industrial and warehouse to residential. It is better that the Council plan for a comprehensive mixed-use scheme that includes significant economic development rather than risk the loss of such units to residential. Class D Training Centres Workspace considers that this policy should support skills and training facilities within industrial and business use areas. These facilities are important for the development of the local, regional and national economies and also important for the social generation and well-being. Such facilities are particularly important for the development and growth of small and medium sized enterprises, which form the engine of economic growth at a local level and London-wide level. It is important that training facilities are provided close to major sources of employment to create a synergy between business and education and create important links. Industrial and business use areas provide an important location in which develop training facilities.</p>		<p>New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amenity</p>
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27	162	Policy 35	<p>These representations object to Policy 35 'Industrial and Business Use Areas' and Policy 36 'Business Use Areas'. They also object to the glossary definition of Employment Areas, which defines them as sites protected for employment use [B1, B2 or B8] against loss to other uses. Policy 35 'Industrial and Business Use Areas', states inter alia, that the Council shall support the following uses within Industrial Use Areas, Light Industry [Use Class B1 (c)]; General Industry [Use Class B2]; Storage and distribution [Use Class B8]; or Proposals that are ancillary to industrial use. Policy 36 'Business Use Areas', states inter alia, that the Council shall support the following uses within Business Use Areas; General business [Use Class B1]; B1(a) offices up to 500 sqm are encouraged to meet local need; General industry [Use Class B2] that is considered more suitable outside of the Industrial and Business Use Areas in terms of its scale; Storage and distribution [Use Class B8]; or Ancillary uses and small-scale facilities that serve the needs of employees. It is considered that these policies and definition are contrary to the approach which is set out in the Draft Core Strategy and Strategic Objective 2 which supports the flexible approach to maintaining Strategic Industrial Locations (SILs) and other employment land to meet business needs. It is also inconsistent with the approach in Core Policy 1 'Overarching Objectives', which states, inter alia, that in accordance with the London Plan, Harrow's SILs will be protected for industrial and (wherever appropriate) related uses is also supported (Para 4.1). Further, Core Strategy Policy CS1 'Managing Growth in Harrow', states that SILs will be promoted for appropriate economic development uses in accordance with the London Plan (Part N). The London Plan Industrial Capacity SPG, adopted March 2008, recognises at para 1.9 that potential users of industrial land may include use classes other than B1 (b), B1(c), B2 and B8, such as sui generis uses. It is essential that the draft Development Management DPD is consistent with the draft Core Strategy which supports the widest range of employment uses. This approach is advocated by PPS4 (2009), EC2.1 (h) which states that Local Planning Authorities should ensure that the development plan identifies a range of sites to facilitate a broad range of economic development. Policy EC2.1 (b) of PPS4 also states that: mmk JLB0105 200611 "Policies should be flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances." Proposed Inclusion For clarity, these representations propose the inclusion of sui generis uses within Policy 35 and Policy 36 and a definition of appropriate uses on employment and industrial land within the glossary of the Core Strategy, as follows; "Appropriate development on employment and industrial land comprises all business falling within use Classes B1, B2, B8 and closely related uses not falling within a use class, sui generis uses, (such as cash and carry businesses and builders merchants) but which are commonly found in industrial estates." The sui generis uses referred to above are commonly found in industrial estates and are an established and accepted use of employment allocated land. They each generate employment, often at greater levels than B1, B2 and B8. Thus sui generis uses are an important part of the economy.</p>	<p>Object. These policies and definition are contrary to the approach which is set out in the Draft Core Strategy and Strategic Objective 2 which supports the flexible approach to maintaining Strategic Industrial Locations (SILs) and other employment land to meet business needs.</p>	<p>New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amenity</p>
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5	163	Policy 36	As above(policy 35), Policy 36 should also be amended to include reference to other employment-generating uses as appropriate uses within Business Use Areas. The MPA/S recommend that an additional bullet point be added to Policy 36 as set out above.	To include reference to other employment-generating uses as appropriate uses within Business Use Areas	New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amentiy
24	164	Policy 36	Workspace supports the proposed uses within the business area, however, as with Policy 35, it is considered that this policy is too rigid to meet the needs of small and medium sized enterprises and the variety of markets in which they occupy. The policy should also consider the following matters: i,§ Small and medium enterprises - As referred to above under Policy 35, small and medium sized enterprises have an important role in leading entry into emerging sectors that by definition do not necessarily fit comfortably within the traditional Class B planning use classes. It is important this policy is sufficiently flexible to encourage the economic development of small and medium sized enterprises regardless of use class. i,§ Class D training centres - As referred to above under Policy 35, it is important that training facilities are encouraged in areas in close proximity to existing employment areas as these facilities are essential for driving the economy forward by increasing the skills and expertise of existing businesses. Such facilities are also important providing employment opportunities within the local workplace.	Policy too rigid to meet needs of SMEs.	New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amentiy

19	165	Policy 38	In its current form, we object to Policy 38 relating to changes of use from B1 to D1. It is fully accepted that full marketing evidence should be produced to support any such proposals, and that site's should have good public transport accessibility and level access, there are concerns about a number of the other criteria. It is stated that the site should not be in close proximity to residential properties. Whilst it is of course correct that the protection of residential amenities should be of primary concern, if it can be demonstrated that the intensity of the proposed use would not be detrimental to amenities over and above that of the existing B1 use, the site's location should not be a sole determining factor. Please note our strong objection to the third consideration, stating that the site is not within a designated Business Area or town centre. If sufficient marketing can be provided to justify the change of use, the sites location should not necessarily override this. Indeed, a college use is considered to be a wholly compatible town centre use, with the wider economic benefits that students would bring to local shops and businesses. This 'trickle down' effect is hugely beneficial to a local area than a vacant office building which would offer no economic benefits. The fact that a college would provide employment opportunities would suggest that it is also a wholly compatible use with Business Area employment objectives. It should also be noted that there are a number of approved colleges within the Borough which operate within the same buildings as space still used for B1 office purposes. Such uses can operate in the same building without undue concerns or disturbance. Again, this should not be a single determining factor is an applicant can prove the uses can co-exist appropriately.	Object to criteria. Refinement required.	Policy amended to cover change of use of offices generally and increased flexibility. Supports the change of use to economic generating uses, including education.
24	166	Policy 38	Workspace objects to Policy 38, as it constitutes a rigid policy that could potentially undermine the effective use of existing floorspace that no longer has an economic function. Class D education and training centres have a strong connection with existing businesses as they are important for improving the expertise and skills set of business, which improves competitiveness in the market place. It is unreasonable to prevent such facilities within town centres and business areas. This approach could undermine economic and educational connections and could result in unsustainable travel patterns. It is unreasonable to prevent Class D education and training centres within buildings that contain existing businesses. Both uses can co-exist without impacting on the other and in fact Workspace can cite several examples within their portfolio where Class D and Class B uses sit alongside each other successfully.	Object. Too rigid.	Policy amended to cover change of use of offices generally and increased flexibility. Supports the change of use to economic generating uses, including education.

28	167	Policy 38	Policy 38: change of use from B1 office to D1 Non residential Education and training centres. The Economic Development team does not think a specific policy on this type of change of uses is required. It is understood that the recent flood of applications for D1 uses was due to the requirement of existing education establishments to provide evidence of having a valid planning permission to access funding. It is therefore considered that the number of such applications will reduce in the coming months. Specifically, the Economic Development Unit is not sure that criteria #5 that the proposal would not be within close proximity to existing offices within the same building is a valid planning reason for refusing permission. The assumption is that the building would be within the same ownership and that any effect on an existing (office) use within the same building would be an issue between existing leaseholders and their landlord for them to resolve rather than a planning issue. If the policy is aimed at limiting loss of B1 accommodation, rather than limiting the amount of D1 uses, then the policy should be more generic and not just focus on change of uses to D1.	Policy not required	Policy amended to cover change of use of offices generally and increased flexibility. Supports the change of use to economic generating uses, including education.
23	168	Policy 39	In line with London Plan policies there should be some support for Live/Work units as per the previous UDP which said 'The Council encourages the development of work/live units; that is low cost, small workshop or office floorspace with ancillary, integral living accommodation'.	Live/work units supported	Policy amended to support live/work units
3	169	Policy 40	Draft Policy 40 concerns development involving tourism. This policy states, amongst other things, that "planning permission may be considered for the development or expansion of hotel facilities or larger trip-generating tourist attractions where these are to be located in town centres and where public transport links and accessibility is good." It is considered that this text should be amended to refer to the sequential approach for town centre uses (including hotels) within PPS4, and to recognise that hotels may also be suitable where public transport links and accessibility can be improved to a satisfactory standard.	Wording change	Policy amended to include sequential approach to site selection. Support given for smaller Hotels etc
6	170	Policy 40	While the commitment to ensure tourism development is wheelchair accessible is supported, the Council should state the requirement that a minimum 10% of hotel rooms should be wheelchair accessible, in line with draft replacement London Plan Policy 4.5. The Council may wish to add this detail to the fourth bullet within the policy box.	Wording change	Policy amended to include requirement
28	171	Policy 40	Policy 40: The inclusion of future changes of use from hotel uses in the last sentence within same policy is confusing. It is not clear what the purpose of this part of the policy is. If it is to generally stop the loss of employment uses, then this should be in a generic separate policy that covers loss of other employment uses (not just hotel uses).	Wording change	Policy re-worded to avoid confusion



3	172	Policy 41	Draft Policy 42 relates to the loss of public houses. In order for the redevelopment or change of use of a public house to be deemed acceptable, one of the criteria within draft Policy 41 is for another community-based facility to be proposed as part of any redevelopment. It is considered that in order to provide sufficient flexibility, "where possible" should be added to the end of this particular criterion.	Wording change to allow flexibility	Policy revised to include viability
10	173	Policy 41	We support Policy 41	None	Support noted
29	174	Policy 41	We object to this policy as it is wrong in planning law, unreasonable and too prescriptive in the nature of allowable use changes. Public Houses (Class A4) have a permitted change of use under The Town and Country Planning (General Permitted Development) Order 1995A to Class A3, A2 and A1. This restrictive policy proposed should therefore be deleted as it cannot be in direct conflict with existing statute law. Furthermore, Class A4 is a retail use by nature of its A class designation and therefore changes of use should be determined by policies relating to Retail Development and not by a specific policy seeking to retain all public houses as community based facilities which fall within a different use class (D1 and D2). It is wholly unreasonable to restrict a change of use from a public house by the 4 cumulative criteria proposed. Harrow is a London borough which offers residents a wide range of drinking establishments. Restrictions of this nature are only appropriate where there is only say one public house in an entire, isolated village not a Borough of the UK's capital.	Object. Wrong in planning law.	Policy amended to reflect permitted changes of use.
3	056	7.35	Paragraph 7.35 within the draft DMP DPD confirms that "a flexible approach to the loss of employment floorspace could result in consequential impacts on the local economy." Land Securities notes this viewpoint, although advises against a blanket "protectionist" policy, which would be contrary to guidance in PPS4 that requires emerging policies to be sufficiently flexible to deal with changing circumstances. It is considered that seeking to maintain a sufficient supply of employment floorspace is a more appropriate approach.	Wording change	Text amended to reflect this approach
3	057	8	This chapter makes a number of references to Harrow Metropolitan Centre. It is noted that Harrow Town Centre falls within the boundary of the IA and hence should be considered through the AAP process. The DMP DPD should not pre-empt detailed policies within the AAP relating to Harrow Metropolitan Centre, nor Wealdstone District Centre.	IA emphasis not required	See comments above re AAP and DM policy coverage

10	058	8	We support the Council in their aim to ensure "that the shopping centres in the Borough retain their vitality and vibrancy within the main centres" (paragraph 8.1), and we hope that the Council will seek to improve the vitality in many of the town centres in the borough. We very strongly support paragraphs 8.7 and 8.8, and strongly agree with Policies 42, 43 44 and 46. Å	None	Support noted
12	059	8	We welcome the policies in defence of retail development, and support all efforts to maintain the minimum percentages ( by no means excessive), while acknowledging the recognition of permanent behavioural changes of consumers. In Local Centres, the Council should resist split development of premises as part non- retail(A3 ) and part retail with shop display frontage as this has proved too difficult to enforce	Resist split development of premises as part non- retail(A3 ) and part retail with shop display frontage as this has proved too difficult to enforce	Support noted
3	060	8.1	Paragraph 8.1 of the draft DMP DPD states that "Government guidance requires new shops and leisure facilities to be located in town centres..." It is considered that this should be supplemented by "...first, in accordance with the sequential approach outlined in PPS4."	Wording change	Revised to reflect NPPF
6	061	8.1	For clarity, the Council may wish to state in paragraph 8.1 that development management policies for retail/economic growth in Harrow Metropolitan town centre and Wealdstone District centre will be set out in detail within the Harrow and Wealdstone Area Action Plan.	Wording change	See comments above re AAP and DM policy coverage

28	175	Policy 42	Why not redesignate it all as secondary frontage? Especially if high vacancy rates.	All parades as secondary frontages	An element of primary frontage is required to secure a level of core retail use. The Retail Study does not suggest otherwise. Boundaries are changed where necessary through the Site Allocations DPD
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28	176	Policy 43	The criteria are generally acceptable, however, the Economic Development Unit is concerned that the following 2 criteria could severely limit the type of business that could be accommodated in a Secondary Frontage. - the designated frontage must retain an active frontage (A definition of what constitutes an "Active Frontage" should be included in the glossary.) - a window display is maintained Will policy 43 help the look of district, neighbourhood and local shopping centres, where there is decline, For example where figures exceed 20% of empties, will this help secure new investment? Would these criteria mean that for example a solicitors office would not be allowed as it is unlikely to have a window display. Does it constitute an active frontage? Paras 8.17, 8.18, 8.19, 8.20: suggest that these paragraphs are moved to after para 8.8 to help flow of chapter.	Wording change	Policy amended to include flexibility, and increased percentages in non retail, especially if high vacancy rates are evident.
5	177	Policy 44	Policy 44 states that the Council will encourage commercial, community or other non-residential uses on the ground floor of neighbourhood parades, provided that an active frontage is retained. The MPA/S support the inclusion of community uses as acceptable uses within neighbourhood parades which will ensure the future delivery of police facilities that enable better public access .		Support Noted
6	178	Policy 44	This policy is supported in line with draft replacement London Plan policy 4.9. However, the Council should review the text of the first paragraph of the policy box, and consider whether the intention is to refer to "A1 uses" rather than "non-A1 uses" . The Council should clarify whether, or not, neighbourhood parades in this policy are the same as local centres defined in paragraph 8.19 of the document. (Refer to comment 23 in this appendix).	Wording change and clarification	Policy revised to clarify this
6	062	8.18	The wording of paragraph 8.18 is not supported as it does not draw out the different roles of the District centres, relative to Harrow Metropolitan centre. The paragraph should be reworded to indicate that Harrow Metropolitan centre will contain a larger proportion of higher order comparison goods, retail and leisure, and the District centres will support a range of convenience and comparison goods retail and leisure, but at a smaller scale than that in Harrow town centre.	Wording change	Harrow Metropolitan centre is covered by the Area Action Plan

6	063	8.19	Officers note that the list of small shops, of a local nature, in paragraph 8.19 differ to those highlighted in paragraph 8.14. This would suggest "local centres" are defined differently to "Neighbourhood parades" in this DPD. The London Plan combines neighbourhood and local centres into one category, however, the GLA would have no objection if the Council wished to introduce greater resolution within this DPD by separating the two. The Council should, however, clarify the situation (i.e. whether "local centres" are defined differently to "Neighbourhood parades" in this DPD) so the distinction is clear when policy is being applied.	The Council should, however, clarify the situation (i.e. whether "local centres" are defined differently to "Neighbourhood parades" in this DPD) so the distinction is clear when policy is being applied.	Policy amended – local centres and neighbourhood parades to have same criteria
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15	179	Policy 45	We note that Policy 45 makes it clear that unless otherwise indicated in the Sites Specific Allocation DPD there shall be a presumption against the loss of employment floorspace in Town Centres. Given the overlap between the Harrow and Wealdstone Area Action Plan and the Site Specific Allocation DPD, we believe that further clarification could be provided by specifically referring to the Area Action Plan in this policy, in this DPD. Additionally with regards to the blanket approach to the presumption against the loss of employment floorspace, we feel that this is wholly inflexible and does not permit the reasoned and justified reduction in employment floorspace that is currently being promoted by the Core Strategy and supported by evidence. We feel that this conflict in the reasoning should be omitted and that the Policy 45 should be updated to reflect the typical 'criteria based' assessment for the consideration of loss of employment floorspace - as promoted elsewhere in the Councils LDF.	IA not relevant. Policy too rigid	Policies in this section have been amended to reflect the flexible approach of the Core Strategy relating to employment generating uses and their suitability on employment land
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24	180	Policy 45	<p>Workspace considers that this policy fails to understand the economic dynamics of employment floorspace and as such, objects to this policy as it could stifle economic regeneration and growth within mixed-use schemes. Policy 45 states that there is a presumption against the loss of employment floorspace within town centres but does allow mixed-use development. It is unclear from the policy whether employment floorspace may be redeveloped with a mixed-use development or whether the existing floorspace should be converted. This policy also does not recognise that several office buildings within Harrow are no longer economically viable. The implementation of the requirements of this policy would demonstrate a lack of understanding of employment land, the use of employment floorspace and property markets. Workspace has witnessed a marked shift in the manner in which the commercial sector use their properties in recent years with an increase in job densities as companies seek to utilise space and reduce cost of operations. This has been achieved by the increase of home working, hot-desking and innovative solutions to storage. Consequently, changing work practices has resulted in many companies seeking reduced space to perform the same function as before. It is clear from Workspace's experience that existing potential employment levels can be maintained or increased on a significantly reduced level of floorspace. This policy should focus on the potential economic output within mixed-use developments and rigid in respect to floorspace expectations. The policy also states that there is an expectation that community and retail uses should provided. The overall mix should be considered on a site-by-site basis and take account of the schemes viability and the potential regeneration benefits.</p>	<p>Objects to this policy as it could stifle economic regeneration and growth within mixed-use schemes.</p>	<p>Policies in this section have been amended to reflect the flexible approach of the Core Strategy relating to employment generating uses and their suitability on employment land</p> <p>New policy added that is supportive of mixed sue development.</p>
30	181	Policy 45	<p>the Harrow and Wealdstone AAP Issues and Options consultation paper refers to the significant level of vacant office floorspace within the Intensification Area and to the fact that numerous large office occupiers have already left the area. Planning policy needs to reflect market trends and therefore a blanket protection of office floorspace will not best serve the future regeneration of Harrow town Centre. I trust you will be able to take into account our representations. We therefore recommend a revision to Policy 45 to reflect this.</p>	<p>Planning policy needs to reflect market trends and therefore a blanket protection of office floorspace will not best serve the future regeneration of Harrow town Centre</p>	<p>Policies in this section have been amended to reflect the flexible approach of the Core Strategy relating to employment generating uses and their suitability on employment land. Criteria for release of employment land to other uses is now included.</p>

3	064	8.22	Paragraph 8.22 of the consultation document confirms that "the Council supports community uses in Harrow Metropolitan Centre, as this is considered the most accessible location provided they do not detract from community uses in other centres or reduce the service in other locations within the Borough." Land Securities is of the view that it would be inappropriate for all community uses to be located within Harrow Metropolitan Centre, as they should be based within the heart of the communities they serve.	Wording change	Policy amended as stated
31	182	Policy 46	Thank you for including the main town centre uses as defined by PPS4 in the introduction to section 8. With a view to the future, and with regard to the deficiencies of leisure and cultural facilities in your town centres, as identified in the Core Strategy and the Harrow & Wealdstone AAP, we object to the first sentence of this policy which would prohibit the construction (or conversion) of a building for a performance space if it had to comply with the approach to retail frontages. If this policy refers to Policy 43 then it should state the relevant criteria for clarity to cover other main town uses such as a new theatre or cinema.	Object to wording that would would prohibit the construction (or conversion) of a building for a performance space if it had to comply with the approach to retail frontages	This requirement has been removed.
10	065	9	Paragraph 9.1 and Policy 47 appear to be mutually non-compatible - are the number of parking spaces in new developments to be restricted to one per unit (as per Policy 47 and the London Plan) or is this restriction now abolished (as per paragraph 9.1 - removed by HMG in Jan. '11)? The artificial restriction of one vehicle per unit is unreal in a relatively affluent area with a high level of car ownership such as much of this borough. We strongly disagree with the restriction to one vehicle per unit in Policy 47, and with the assumption that "new developments in the most accessible parts of the Borough to be car-free" in paragraph 9.3. Â There is no mention of the continuing problem of the traffic congestion and parking difficulties caused by the "school run" traffic in the borough. Although some schools have been required to enforce travel plans under Section 106 conditions of planning consent, this does not happen in practice. At school leaving times the local bus services, and particularly Harrow Bus Station, get overstretched, so additional, alternative, transport solutions are required. Â	Parking change	Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.

3	183	Policy 47	<p>Draft Policy 47 relates to parking standards. It should firstly be made clear that these standards relate to developments within the rest of the Borough outside the IA. Furthermore, where the draft policy states that "residential development shall not exceed one space per unit" it is considered that "unless fully justified" should be added. This would provide sufficient flexibility to consider site-specific circumstances, and provide for instances where applicants can demonstrate there would be no adverse impact on the local highway network should an increased number of car parking spaces be proposed.</p>	<p>IA not relevant. Wording to allow flexibility in policy.</p>	<p>Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.</p>
4	184	Policy 47	<p>Â Policy 47 outlines that developments, including redevelopments and changes of use, should not exceed the maximum parking standards set out in the London Plan. Key points from the emerging policy from Dandara's perspective are as follows:- Â Residential developments shall not exceed 1 space per unit; Developments shall provide the minimum level of car parking provision necessary for people with disabilities and servicing; Developments in appropriate locations in town centres and within CPZ's and where they are supported by a high public transport accessibility are encouraged to be car-free; The Council shall encourage S106 contributions towards car clubs and pool car schemes in place of private parking in new developments...and seek the provision of electric charging points as part of any car parking provision; Developments shall meet the minimum standards for cycle parking set out in the London Plan. Â Whilst Dandara generally agree with the policy objectives outlined above, i.e. parking for people with disabilities and servicing, contribute toward car clubs, electric charging points, cycle parking, there is a very real concern that the policy is at odds with Planning Policy Guidance 13: Transport (PPG 13) (amended January 2011). The amendments to PPG 13 in January 2011 removed national planning restrictions put in place in 2001 that required Council's to limit the number of parking spaces allowed in new residential developments yet this is precisely what Policy 47 seeks to achieve. It is appreciated that a balance needs to be struck between meeting the needs of drivers and encouraging more sustainable measures. Nevertheless, to comply with national planning policy, Council's should not set out to restrict the amount of parking on site as Policy 47 currently does. To strike the right balance, Policy 47 should be less prescriptive and should allow for greater flexibility for appropriately located developments to provide an appropriate level of parking within these developments rather than apply an arbitrary standard which does not take into consideration the specifics of a development or its location.</p>	<p>Conflict with PPG13. Policy should be less prescriptive and allow flexibility in provision of car parking.</p>	<p>Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.</p>

5	185	Policy 47	<p>This policy seeks to apply the London Plan parking standards for all developments including redevelopments and change of use applications. However, the MPA/S recommend that reference should be made within this policy to specialised land uses, where the parking requirement should be assessed on an individual basis. This policy should therefore be expanded to include reference to meeting operational need. This is supported by the Consolidated Draft Replacement London Plan (December 2010) which seeks to ensure that the provision of parking at ambulance, fire and policing facilities will be assessed on their own merit. The amended wording has since been endorsed by the Mayor of London as set out in his March 2011 Panel Report. Mindful of the above, it is recommended that the following wording is included after the first paragraph of Policy 47 (additional wording underlined):- The parking requirement for emergency service, such as ambulance, fire and policing facilities will be assessed on an individual basis, having regard to specific operational need of a particular use.</p>	<p>Reference should be made within this policy to specialised land uses, where the parking requirement should be assessed on an individual basis</p>	<p>Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.</p>
6	186	Policy 47	<p>Supported. The Council should, however, make reference to draft replacement London Plan policy 6.13, which sets out the London Plan standards for the provision of electric charging points.</p> <p>Paragraph 9.2 refers to the amended PPG13: Transport (January 2011), which sought to relax maximum parking standards and allow local authorities to apply a more flexible approach to car parking. The GLA family response to this change has been to uphold the prevalence of the London Plan in providing guidance for development in London. The Council's intention to maintain maximum standards in accordance with the London Plan is, therefore, strongly supported.</p>	<p>The Council should, however, make reference to draft replacement London Plan policy 6.13, which sets out the London Plan standards for the provision of electric charging points.</p>	<p>Reference added in the Reasoned Justification</p>



7	187	Policy 47	The RNOH Trust objects to the draft wording of this policy. The policy states that developments, including redevelopments and changes of use, should not exceed the maximum parking standards set out in the London Plan, but then contradicts this by stating that residential developments shall not exceed one space per unit. Both the current London Plan (consolidated with further alterations since 2004, adopted February 2008) and the Draft Replacement London Plan (published for consultation October 2009) allow for more than one car parking space to be provided per unit for residential developments that provide two or more bed spaces. Policy 47 should be amended so that car parking is provided in accordance with the standards set within the London Plan. Further, to allow greater flexibility for developments, the policy should allow a greater provision of car parking where exceptional circumstances can be demonstrated to justify an additional amount.	Object. Wording change	Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.
11	188	Policy 47	It is unreasonable not to allow some individual residential developments to have more than one parking space eg larger family houses	Unreasonable.	Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.

14	189	Policy 47	<p>We support this policy, especially with reference to car-free developments and the restriction of other residential development to one space per unit. One omission, however, is any mention of the importance of providing attractive safe walking routes to the nearest public transport.</p>	<p>One omission, is any mention of the importance of providing attractive safe walking routes to the nearest public transport.</p>	<p>Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.</p> <p>Safe walking routes and public realm improvements are covered in the Design chapter.</p>
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15	190	Policy 47	<p>We note that this policy advocates the maximum of one parking space per residential unit. Every development proposal is different, and there is no recognition that larger family dwellings situated in the less densely populated areas may benefit from more than one parking space per unit. Additionally, there appears to be little reference or recognition to PTAL ratings, and the degree of accessibility to public transport, shops and services. Whilst it is appropriate for the Council to encourage lower parking provision and reduce the reliance on private car-ownership, there are instances such as providing larger family housing accommodation where the market would require more than one parking space per unit. We note that para 52 and 53 of PPG13 makes reference to Local Authorities setting levels to reflect local circumstances, and through Transport Assessments, maintain a flexible approach to site specific and locational considerations. Therefore, we believe the parking standard should be refined to reference that on balance, residential development shall not ordinarily exceed an average of one space per unit, however this should be supported by a reasoned justification. Finally, on a general point, we note that the concept of Development Management is a positive stance, allowing engagement with developers to bring forward and facilitate sustainable growth, rather than the regulatory approach of Development Control. We note that the Killian Pretty Review made clear recommendations to deliver a more positive and proactive approach to Development Management (rather than Development Control), and to reduce unnecessary complexity and burdens. The Development Management Policies DPD will therefore need to set the framework for a positive predisposition to encouraging sustainable growth and development, and should maintain sufficient flexibility and consideration of specific considerations. We trust that you will find the above in order and that you will give due consideration to our comments on behalf of our joint client whilst taking forward and refining the Draft Development Management Policies into the next round of Consultations (regulation 27). We reserve the opportunity for our client to make further representations on other draft policies that may emerge, or on later consultations, and we request to be kept informed of any future publications / consultations.</p>	Flexibility in parking standards	Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.
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28	191	Policy 47	This needs to be amended to support residents wishing to stop and park outside a local shop, pop into the shop, make their transaction and return their car. (Small transactions with the type of businesses detailed in section 8.19 - pharmacy, small supermarket and newsagent),	Parking standards to be amended.	Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.
6	066	9.7	Paragraph 9.7 refers to the collection of a contribution towards off site cycle parking provision. TfL would expect all cycle parking to be provided on site, unless there is clear justification for not doing so. TfL will assess proposals on a site by site basis, to ensure they would accord with the London Plan.	Cycle provision to be on-site	Policy amended to require development to comply with London Plan cycle parking standards

6	192	Policy 48	This policy is broadly supported, however, the Council should strengthen it to require developers to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials in line with London Plan policy 4A.28 and draft replacement London Plan policy 5.18.	Policy should be strengthened to require site waste management plans	Requirement for Major development to produce management plan added
3	067	10	There are numerous references within this chapter to the requirement for community uses to be located in areas which are easily accessible by sustainable modes of transport. It is considered that it would be beneficial to refer instead to areas which are, or which can be made, accessible.	Wording change	This is now supported by the Core Strategy
6	068	10	Supported, no specific comments.	None	None

3	193	Policy 49	Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.		Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria
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5	194	Policy 49	Â Policy 49 seeks to protect existing community uses unless it can be demonstrated that there is no longer a need for that facility, where there are similar facilities near by and the facility can be relocated elsewhere within the Borough. The MPA/S support this policy.		Support noted
22	195	Policy 49	Policy 49 - Community and Education Facilities Â Object Â Sport England welcomes the inclusion of Policy 49 - Community and Education Facilities. However, Policy 49 needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. This is required in order to maximise the community access of new facilities and increase their value to community users. Furthermore, Policy 49 needs to support the provision of new facilities and give guidance regarding their location in order to provide justification for the principle and location of the new facilities	Needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. Wording change.	Policy amended to support this and new policy added re New facilities
31	196	Policy 49	We support this policy but it is unclear what is meant by the term 'community facilities'. We see there is an entry in the Glossary for this term but it is by no means adequate. For clarity and greater certainty of intended outcomes, and so that guidelines are clear and consistent, we recommend a description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the enhancement and development of community facilities to reflect the identified deficiency of these in the Borough. In the justification of this policy at para.10.2 examples of Use Classes are listed. For consistency and clarity we suggest that sui generis buildings are also included with examples being theatres, nightclubs and launderettes, as these are components of community facilities. If the council is particularly concerned about educational facilities then it could provide an individual policy for this issue.	Clarification on the definition of community facilities.	These shall be in accordance with definitions within the Core Strategy
5	069	10.2	The supporting text of Policy 49 identifies a range of Class D1 and D2 uses which are to be supported and protected in Harrow. However, the MPA/S note that policing facilities are not included anywhere within this chapter. Policing facilities are defined within Policies 3A.17 and 3A.18 of the adopted London Plan as a community facility and therefore represent a key aspect of social infrastructure. Further, the emerging London Plan specifically includes 'Policing' within the Social Infrastructure definition and draft Policy 3.17 states development proposals should support the provision of additional social infrastructure mindful of strategic and local need. Â It is clear that the provision of appropriate policing facilities is a strategic issue and that therefore this should be	Policing to be included. Wording change.	Policing facilities are recognised in the Core Strategy as community facilities, no need to replicate this again.

3	193	Policy 49	Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.		Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria
5	194	Policy 49	Â Policy 49 seeks to protect existing community uses unless it can be demonstrated that there is no longer a need for that facility, where there are similar facilities near by and the facility can be relocated elsewhere within the Borough. The MPA/S support this policy.		Support noted
22	195	Policy 49	Policy 49 - Community and Education Facilities Â Object Â Sport England welcomes the inclusion of Policy 49 - Community and Education Facilities. However, Policy 49 needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. This is required in order to maximise the community access of new facilities and increase their value to community users. Furthermore, Policy 49 needs to support the provision of new facilities and give guidance regarding their location in order to provide justification for the principle and location of the new facilities	Needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. Wording change.	Policy amended to support this and new policy added re New facilities
31	196	Policy 49	We support this policy but it is unclear what is meant by the term 'community facilities'. We see there is an entry in the Glossary for this term but it is by no means adequate. For clarity and greater certainty of intended outcomes, and so that guidelines are clear and consistent, we recommend a description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the enhancement and development of community facilities to reflect the identified deficiency of these in the Borough. In the justification of this policy at para.10.2 examples of Use Classes are listed. For consistency and clarity we suggest that sui generis buildings are also included with examples being theatres, nightclubs and launderettes, as these are components of community facilities. If the council is particularly concerned about educational facilities then it could provide an individual policy for this issue.	Clarification on the definition of community facilities.	These shall be in accordance with definitions within the Core Strategy
			reflected in the emerging Development Management Policies DPD - as required by PPS12. In order to ensure the emerging DPD can be judged 'sound' it is thus recommended that reference is made within paragraph 10.2 to allow other community		

3	193	Policy 49	Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.		Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria
5	194	Policy 49	Â Policy 49 seeks to protect existing community uses unless it can be demonstrated that there is no longer a need for that facility, where there are similar facilities near by and the facility can be relocated elsewhere within the Borough. The MPA/S support this policy.		Support noted
22	195	Policy 49	Policy 49 - Community and Education Facilities Â Object Â Sport England welcomes the inclusion of Policy 49 - Community and Education Facilities. However, Policy 49 needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. This is required in order to maximise the community access of new facilities and increase their value to community users. Furthermore, Policy 49 needs to support the provision of new facilities and give guidance regarding their location in order to provide justification for the principle and location of the new facilities	Needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. Wording change.	Policy amended to support this and new policy added re New facilities
31	196	Policy 49	We support this policy but it is unclear what is meant by the term 'community facilities'. We see there is an entry in the Glossary for this term but it is by no means adequate. For clarity and greater certainty of intended outcomes, and so that guidelines are clear and consistent, we recommend a description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the enhancement and development of community facilities to reflect the identified deficiency of these in the Borough. In the justification of this policy at para.10.2 examples of Use Classes are listed. For consistency and clarity we suggest that sui generis buildings are also included with examples being theatres, nightclubs and launderettes, as these are components of community facilities. If the council is particularly concerned about educational facilities then it could provide an individual policy for this issue.	Clarification on the definition of community facilities.	These shall be in accordance with definitions within the Core Strategy
			facilities, which do not fall within Use Classes D1 or D2, to be supported by Policy 49.. The MPA/S therefore recommend the following amendment to paragraph 10.2 (additional wording underlined):- Â ...Examples of Class D2 uses include cinemas,		

3	193	Policy 49	Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.		Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria
5	194	Policy 49	Â Policy 49 seeks to protect existing community uses unless it can be demonstrated that there is no longer a need for that facility, where there are similar facilities near by and the facility can be relocated elsewhere within the Borough. The MPA/S support this policy.		Support noted
22	195	Policy 49	Policy 49 - Community and Education Facilities Â Object Â Sport England welcomes the inclusion of Policy 49 - Community and Education Facilities. However, Policy 49 needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. This is required in order to maximise the community access of new facilities and increase their value to community users. Furthermore, Policy 49 needs to support the provision of new facilities and give guidance regarding their location in order to provide justification for the principle and location of the new facilities	Needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. Wording change.	Policy amended to support this and new policy added re New facilities
31	196	Policy 49	We support this policy but it is unclear what is meant by the term 'community facilities'. We see there is an entry in the Glossary for this term but it is by no means adequate. For clarity and greater certainty of intended outcomes, and so that guidelines are clear and consistent, we recommend a description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the enhancement and development of community facilities to reflect the identified deficiency of these in the Borough. In the justification of this policy at para.10.2 examples of Use Classes are listed. For consistency and clarity we suggest that sui generis buildings are also included with examples being theatres, nightclubs and launderettes, as these are components of community facilities. If the council is particularly concerned about educational facilities then it could provide an individual policy for this issue.	Clarification on the definition of community facilities.	These shall be in accordance with definitions within the Core Strategy
			sports halls, indoor and outdoor sports and leisure uses and bingo halls. Other community uses which do not fall within Use Classes D1 or D2, will also be supported. Â In order for the emerging DPD to be consistent with the strategic development plan,		



3	193	Policy 49	Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.		Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria
5	194	Policy 49	Â Policy 49 seeks to protect existing community uses unless it can be demonstrated that there is no longer a need for that facility, where there are similar facilities near by and the facility can be relocated elsewhere within the Borough. The MPA/S support this policy.		Support noted
22	195	Policy 49	Policy 49 - Community and Education Facilities Â Object Â Sport England welcomes the inclusion of Policy 49 - Community and Education Facilities. However, Policy 49 needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. This is required in order to maximise the community access of new facilities and increase their value to community users. Furthermore, Policy 49 needs to support the provision of new facilities and give guidance regarding their location in order to provide justification for the principle and location of the new facilities	Needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. Wording change.	Policy amended to support this and new policy added re New facilities
31	196	Policy 49	We support this policy but it is unclear what is meant by the term 'community facilities'. We see there is an entry in the Glossary for this term but it is by no means adequate. For clarity and greater certainty of intended outcomes, and so that guidelines are clear and consistent, we recommend a description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the enhancement and development of community facilities to reflect the identified deficiency of these in the Borough. In the justification of this policy at para.10.2 examples of Use Classes are listed. For consistency and clarity we suggest that sui generis buildings are also included with examples being theatres, nightclubs and launderettes, as these are components of community facilities. If the council is particularly concerned about educational facilities then it could provide an individual policy for this issue.	Clarification on the definition of community facilities.	These shall be in accordance with definitions within the Core Strategy
			the MPA/S note that the above recommendation should be considered alongside our representations towards chapter 13 - glossary (set out below).		
3	070	10.3	Paragraph 10.3 of the consultation document notes, amongst other things, that "if the	None	The retention of

3	193	Policy 49	Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.		Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria
5	194	Policy 49	Â Policy 49 seeks to protect existing community uses unless it can be demonstrated that there is no longer a need for that facility, where there are similar facilities near by and the facility can be relocated elsewhere within the Borough. The MPA/S support this policy.		Support noted
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			sole redevelopment of a community or education facility is not possible, the facility should still be provided as part of any mixed-use scheme to ensure a community or education function is maintained." It is considered that this may be appropriate but only		facilities is subject to demand.

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			where there is evidence of need.		
10	197	Policy 50	We agree with Policy 50.	None	Support Noted

12	198	Policy 50	Policy 50 is over concentrated on buildings, streets etc. The reference to "visual amenity" is too inadequate and weak in relation to the damaging effects on open space; see, for example, the brutal mast dominating the view from Shaftesbury Playing Fields in Green Belt in Hatch End.	Reference to visual amenity inadequate.	Visual amenity impacts are assessed on a site by site basis.
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32	199	Policy 50	<p>The MOA monitors all emerging development plan policies and supplementary planning guidance that relate to telecommunications development and those which would have an impact on their member's agreements to supply a mobile telecommunications service in the UK. Mono Consultants undertake this project on behalf of the MOA. We refer specifically to Policy 50 : Telecommunications, and whilst we encourage the inclusion of a policy facilitating telecommunications development within the LDF we consider certain criteria within the policy to be overly restrictive and thereby not within the provisions of the national guidance in PPG8. In particular the criteria relating to equipment installed within streets is ambiguous and open to interpretation, there is no reference to what sequential test the policy is referring to and no such sequential test is contained within PPG8. PPG8 and the Code of Best Practice requires that a series of options are considered to siting and design and provides advice on such matters. We would therefore consider this criteria unacceptable and request it is removed from the policy. We also do not consider that the policy requires a criteria relating to consultation with educational facilities, such practice is enshrined within the Code of Best Practice as part of the consultation process, but has no relevance to the siting and design of telecommunications development, which PPG8 confirms are the key elements to be addressed by the planning system. We therefore strongly object to the inclusion of this criteria and request that it is removed from the policy On this basis we would suggest an alternative policy which reads; Proposals for telecommunications development will be permitted provided that the following criteria are met: - (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</p> <p>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.</p> <p>Justification: Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council are keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and location on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document.....</p>	<p>Too restrictive. Criteria should be deleted. Wording change.</p>	<p>Agree to revision of policy to incorporate some but not necessarily all of the comments. A key objective of the policy is to safeguard visual and residential amenity from telecommunications equipment whilst considering the need for such apparatus. Policy revised to be compliant with NPPF.</p>
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16	072	12	<p>The LDF in providing a strategy for the future development of the area has a key role in helping to co-ordinate new development with the requisite infrastructure. This includes the provision of adequate water resources together with the necessary treatment and distribution systems, and wastewater treatment capacity and disposal routes. It is essential infrastructure is put in place prior to development going ahead and that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. At present Policy 51 does not capture the essence of the need for the co-ordination of infrastructure in tandem with development. The policy also directly refers to planning obligations but does not refer to other mechanisms for the delivery of infrastructure, e.g. via planning condition. Therefore we suggest a reference to We suggest the following wording: "New development and growth will be coordinated and phased in tandem with the provision of appropriate physical and social infrastructure to ensure development results in sustainable communities and potential adverse impacts are mitigated. Proposals, which fail to make satisfactory provision for affordable housing, infrastructure and other site-specific requirements made necessary by the development shall be refused."</p>	Wording change	The Core Strategy adequately covers this requirement. The planning obligations policy has been revised to be more specific and to refer to conditions.
5	073	12.1	<p>As set out above, it is necessary to ensure the emerging Development Management Policies DPD reflects the strategic development plan, with regard to the definition of community facilities. The MPA/S therefore recommend that the definition be amended as follows (additional wording underlined):- <u>Community Facilities: Community facilities include educational facilities, youth centres, advice centres, policing facilities and community halls.</u></p>	Definition change	Policing facilities are recognised in the Core Strategy as community facilities, no need to replicate this again.

3	200	Policy 51	<p>Draft Policy 51 concerns planning obligations. Once again, it would be helpful to clarify that this policy relates to sites outside the IA boundary. It is also considered that the policy as currently drafted would benefit from amendment to remove reference to possible obligations such as affordable housing and infrastructure (as not all proposals will be for residential development, for example). It is considered that it would be more appropriate for the policy to simply read "proposals which fail to make satisfactory provision through a planning obligation for requirements made necessary by the development shall be refused." The supporting text to the policy then lists possible obligations that may be sought, although ultimately this will very much depend on site-specific circumstances and development viability considerations.</p>	IA Clarification Rewording for clarification	<p>See previous comments re DPD coverage.</p> <p>The planning obligations policy has been revised to be more specific and to refer to conditions.</p>
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4	201	Policy 51	<p>Â Policy 51 outlines that proposals which fail to make satisfactory provision through a planning obligation for affordable housing, infrastructure and other site-specific requirements made necessary by the development shall be refused. Whilst the policy requirement is acceptable in principle, developers require certainty on the planning obligations which will be sought. The text which accompanies Policy 51 sets out that the Council will prepare an SPD to give greater guidance of the types and scale of planning obligations that are likely to be sought. The SPD is urgently required to support not only policies in the emerging DDMP DPD but the emerging Core Strategy, Site Allocations and AAP DPD's. Clarity is required on the Council's priorities, costs associated with certain projects, funding mechanism, etc. In the absence of the SPD (or an indication of planning obligations that will be sought in pre-application meetings), Policy 51 has limited basis and should not be included within the DDMP DPD</p>	Without SPD, policy should be omitted.	The planning obligations policy has been revised to be more specific and to refer to the use of conditions.
6	202	Policy 51	<p>This policy is welcomed. However "transport" should be added to the policy wording. The London Plan clearly prioritises financial contributions for transport and affordable housing. In addition, developers must have regard to the Mayoral Community Infrastructure Levy (CIL) when assessing their transport infrastructure contribution, as required by draft replacement London Plan policy 8.3. The Mayoral CIL will support the delivery of Crossrail, a major strategic transport improvement. The Harrow CIL should have regard to funding local transport improvements, recognising that some transport infrastructure, for example bus network improvements, are not chargeable through a CIL, and will need to be collected through a conventional section 106 mechanism.</p>	Transport should be included as an obligation.	The planning obligations policy has been revised to be more specific. CIL is covered in the Core Strategy and will include transport infrastructure generally.

11	203	Policy 51		Should say subject to scheme viability	Council expects developers to have taken into account the cost of any onsite planning obligations that would be required of the scheme including affordable housing as part of any land deal. The Council will only consider viability on other grounds in exceptional circumstances, e.g. if it is subsequently discovered that the land is constrained in any way for instance, contamination, flood plain, archaeology, etc.
			Should say subject to scheme viability. There must be more flexibility.		
5	074	12.2	A list of proposed items for which planning obligations will be sought is outlined in paragraph 12.2 of the supporting text to Policy 51. The MPA/S support the list of beneficiaries of planning obligations, which will seek to ensure that the impact of development upon social infrastructure is mitigated. However, the MPA/S are aware that significant additional development is likely to come forward in the borough which may increase demands on police facilities. Policy 3A.18 of the London Plan states that policies in DPDs should assess the need for social infrastructure and community facilities, including police facilities, in their area, and ensure that they are capable of being met wherever possible. Policy 3A.26 of the London Plan also highlights the importance of 'ensuring communities benefit from development including through Section 106 agreements' and improving safety and security. For this reason, it is essential that policing facilities are identified as a community facility within the emerging Development Management Policies DPD.	Policing facilities are identified as a community facility within the emerging Development Management Policies DPD	Policing facilities are recognised in the Core Strategy as community facilities, no need to replicate this again.



11	075	12.2	12.2 List is excessive, I suggest, at least in the current climate.	Reduce list	The list has been revised.
3	076	12.4	Paragraph 12.4 of the consultation document recognises that the Council will negotiate planning obligations on an application by application basis. Land Securities welcomes the recognition that each site will require bespoke obligations, although notes that in each instance regard must be had to the three statutory tests within Community Infrastructure Levy Regulation 122.	Regard must be had to the three statutory tests within Community Infrastructure Levy Regulation 122.	The tests, as set out in the NPPF are referenced
10	204	Policy 52	Â Policy 52 on "Enforcement" will only be of use if it is actually enacted, and the necessity for such action could easily be avoided if site visits by Building Regulations Inspectors included a requirement to check for compliance with the necessary planning consents.	None	None
12	205	Policy 52	Â We regret the weakness of both Council policy and Government guidance in the over-dependence on expediency, in Policy 52 and paragraph 12.6.	None	None