

## Respondents to consultation on the AAP Preferred Option

ID No.	Respondent	ID No.	Respondent
1	Eileen Kinnear	30	John Orchard
2	Keith Perrin	31	David Yeaman
3	Phillip O'Dell	32	CBRE - Dandara
4	Pat Burman	33	CGMS – Met Police
5	Tom Vahey	34	Harrow Civic Residents Association
6	Jonathan Barker	35	Roxborough Road Residents' Association
7	Sharon Ward	36	Dr M Lowrie
8	E. Spencer	37	Christopher Langley
9	Andrew Reed	38	Environment Agency
10	Thames Water	39	TfL Corporate Finance – Property Development
11	PPM Planning	40	Harrow Friends of the Earth
12	Helen Riley	41	Harrow Weald Tenants and Residents Association
13	Richard Maylan	42	Katherine and Jack Bye
14	BNP Paribas (on behalf of Post Office)	43	Penoyre & Prased LLP on behalf of ColArt
15	Mrs M Bristow	44	GVA on behalf of AIB Ltd
16	Alan Richardson	45	Kervin Fontaine-Waldron
17	Elaine Slow	46	Brian Murphy
18	Gabor Otvos	47	David Summers
19	Harrow Agenda 21	48	Helen Shorter
20	Savills on behalf of Lyon and Equitable House	49	Preston Bennett on behalf of MP&G Trading
21	Andrew Graham - Salvatorian College	50	CBRE on behalf of Land Securities
22	Hatch End Association	51	Roxborough Residents Association
23	Father McAllister	52	Harrow School - Estates
24	Greater London Authority	53	Mr H German
25	Campaign for a Better Harrow Environment	54	English Heritage
26	Governing Body of Whitefriars Community School	55	Perry Holt and Co on behalf of Aerospares
27	Russell Sutcliffe	56	Terence Frisch
28	Dr A Shah	Anon 1	Anonymous 1
29	Natural England	Anon 2	Anonymous 2

## General Comments

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
3	General	I object to preferred option for the Heart of Harrow. Including Station Road in the plan will only eventually lead to the one centre option with Wealdstone losing its distinct character as identified in the original document. This would severely impose a loss of amenity to my constituents.	Preferred Option	The selection of the preferred option was a decision made by the LDF Panel at its meeting of 26 July 2011 having considered and assessed the responses received to the AAP Issues and Options document, which was subject to public consultation from 13 May 2011 to 24 June 2011. No change
5	General	There are some good ideas being offered up but if there are insufficient parking facilities much will be lost. Crime is the number one concern now, this is a very recent development with a huge influx of Somalis threatening and robbing people in Wealdstone and Harrow weald also a lot of anti social behaviour on the buses, that is why people prefer to use their cars.	Parking and crime	Where sites to be allocated currently include public car parking facilities serving the town centres or a community use, re-provision of the car parking is required as part of the development. The concerns regarding crime and fear of crime are noted, and are addressed in the Area Action Plan through job creation, the regeneration proposals for Wealdstone town centre, and the urban realm enhancements proposed across the whole area. However, matters such as anti-social behaviour on the buses etc is a much wider social issue affecting all of London and is, unfortunately, beyond the scope of the AAP to address. No change
6	General	I have read the information about this plan and my comments follow: Overall I welcome the proactive work of Harrow Council in creating an Action Plan which will act as a template to encourage developers to put resources into following an overall and cohesive plan and also contribute some costs towards the overall development at a time when Council money is in short supply.	Overall principles	Support is noted
8	General	Would prefer buildings to be no taller than existing buildings in Harrow. Support in principle improved walking and cycling routes and green corridors.	Tall Buildings	Some taller buildings will be necessary to meet levels of growth. Much work has been undertaken to ensure the building heights proposed are suitable to their immediate location and add to rather than adversely impact upon the character of the area. <b>Further changes have been made to strengthen the policies on building heights.</b> Support noted for improved walking and cycling routes.
9	General	Please define what the new description "Heart of Harrow", is it the Intensification Area?	Definition	The Heart of Harrow is the name or branding the Council has given to the Intensification Area designation. <b>The</b>

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				Council has amended the introductory paragraphs to clarify this.
9	General	Please note Harrow on The Hill has no hyphens. Harrow-on-the-Hill Station has hyphens. Please be consistently correct.	Terminology	Noted and amendments made
14	General	POL has a number of holdings within the Borough. It is with regards to the following properties that we submit these representations: <ul style="list-style-type: none"> <li>■ Wealdstone CO (Counter) / OFF (Office), 4 – 12 Headstone Drive, Harrow, HA3 5QL; and</li> <li>■ Harrow CO, 14 – 16 College Road, Harrow, HA1 1BE.</li> </ul>	Opportunity sites No. 6 & 18	Post Office Limited's existing land holdings within the AAP area are noted.
19	General	Paras 1.1.1 & 1.1.3 refer to the London Plan and the borough's future housing needs. 2.2.1 states that Harrow is already densely populated for an outer London borough, and London's immediate post-war policy was to reduce London's population by creating new towns. Yet national and wider London policy requires us to accommodate 2800 new homes or 4160 new residents. Simultaneously Caroline Spelman and the Environment Agency are identifying a serious water supply problem for all of the Southeast, and Govt. spokesman Lady Wilcox (February 15) refers to the need to spread economic activity more uniformly across the whole UK. London and the SE are already experiencing congestion on roads and public transport (which has adverse consequences for pollution, comfort, people's leisure-time), at a time when more remote parts of the country are losing population. Modern communications (internet, email, video-conferencing, home-working) enable businesses to operate effectively without needing to be in any particular location. The drift to the SE damages both the SE which receives it and the other parts of the country which lose it. Harrow's proposed expansion accommodates this drift - we should be seeking a more rational national policy of uniform development across the UK. (West Germany before 1989 had no single centre of economic activity and greatly benefitted from this).	Overall principles	Beyond London, the recently abolished regional planning system sought to provide a national policy of more uniform development. In the absence of such a national policy, and regional plans to implement it, it is left to the market and to businesses and individuals to determine where best for them to locate.  Within London, the London Plan provides the strategic framework for reconciling, insofar as possible, requirements for and capacity to deliver new housing and growth across the capital. As a consequence of this strategic, plan-led approach, housing need may not be met in the borough from which it arises. This is certainly the case in Harrow where projections for household growth significantly outstrip the Borough's identified capacity to sustainably accommodate housing development over the plan period.  In a London context, Harrow's contribution to meeting London's housing needs is modest and recognises the borough's limited availability of developable land. No change
22	General	On this occasion we have been unable to examine the consultation document in depth but would like to support the proposals overall in principle. We consider the plans to improve the Heart of Harrow are imaginative and should put Harrow on the map as an	Overall principles	General support is noted as are the concerns regarding building heights, design quality, congestion and leisure and retail provision.

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		<p>important place to visit as well as to reside in</p> <p>We like the idea of the two centres of Harrow and Wealdstone being joined by an attractive, vibrant Station Road and also that the centres will be landscaped with small areas of greenery and trees.</p> <p>Of course, the devil may be in the detail and as residents and businesses on the outskirts of Harrow, we will keep an eye on the progress of these phases of development and will be particularly concerned about height of buildings, the quality of design, the congestion of traffic and parking and the variety of leisure and retail provision.</p>		
24	General	<p>The opening policies of the Area Action Plan set out the overarching principles for the three main spatial components of the intensification area: Harrow metropolitan town centre, Station Road and Wealdstone district centre. These policies place particular emphasis on high quality design, stimulation of employment growth and delivering a favourable mix of uses to promote regeneration and respond to housing need. The proposed approach to managing growth within the intensification area positively builds on the principles established following the issues and options consultation, and is strongly supported.</p>	Overall principles	Support is noted
25	General	<p>We have studied the Preferred Option Consultation Document. We are in agreement with much that it says in terms of regenerating the two town centres - eg careful attention to the design of new buildings, emphasis on the preservation and creation of new views, infilling of unsightly gaps and general streetscape improvements. However we do have a number of comments.</p> <p>The proposed major developments in the Intensification Area will inevitably have an adverse effect on those already living nearby. This fact is scarcely recognised in the consultation document. We suggest that chapter 4's objectives should include the protection of these residents and show the measures to be taken to achieve this.</p>	Objectives	<p>As set out in the accompanying sustainability assessment, the proposed major developments will have positive impact on the immediate area and those living within it, especially in terms of the regeneration of Wealdstone town centre, the improved amenity of Station Road, and the creation of a more prosperous Metropolitan town centre. Across the whole of the Heart of Harrow, new development will contribute to modern business premises – aiding local employment; secure improvements to local parks and open spaces; improve the quality of the public realm; provide new community facilities; and enhance the quality, accessibility and capacity of public transport. Adverse impacts, such as the bulk and scale of new development and traffic congestion are to be mitigated through quality design, the management of building heights, and through transport and road network improvements.</p> <p>No change</p>

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25	General	We remain unconvinced of the need for tall buildings in the two town centres, though we realise we may need to accept single landmark building in Harrow town centre of appropriately high architectural quality and design to justify its height. There are plenty of examples of award winning, low rise, high density housing in other London boroughs and there is a strong groundswell of opinion against tall buildings amongst Harrow residents. We shall return to this subject at a later date.	Tall buildings	Some taller buildings will be necessary to meet levels of growth. Much work has been undertaken to ensure the building heights proposed are suitable to their immediate location and add to rather than adversely impact upon the character of the area. Further changes have been made to strengthen the policies on building heights.
28	General	I welcome the Area Action Plan's statements about improving pedestrian and cycle facilities. A massive increase in cycling to levels seen in Dutch cities will have profound benefits for health, air quality and the local economy. This can only be achieved if roads are built with high quality cycle facilities which are convenient, safe and easy to understand, as per the Dutch guidelines. All new pedestrian routes through the development sites should also be accessible to cycles (either a segregated cycle path if there is space, or a shared use path). The Northwick Park Roundabout is outside the scope of this document but comprises a huge gap in cycling and pedestrian facilities in Harrow/Brent. It should be provided with humped zebra crossings with bidirectional priority cycle crossings set back 5m from each approach arm, and a segregated cycle path around the roundabout.	Pedestrian and cycling facilities	Support for improving the pedestrian and cycling facilities is noted. Northwick Park Roundabout is being modelled as part of the TfL modelling exercise. Appropriate mitigation measures may be required for the roundabout that will include pedestrian and cycle facilities, with proposals being taken forward through revisions to the Council's Transport – Local Implementation Plan
32	General	As a general comment and to inform good practice it is suggested that references are added to the photographs within the document. Whilst some of the wider townscape photographs are useful to provide context, the value of others, such as the barn at Chapter 3, are confusing without a specific reference.	Reference photos and diagrams	Agreed references have been added.
34	General	Harrow Civic Residents Association (HCRA) represents more than 300 households in Rosslyn Crescent, Frogna Avenue and Woodlands Road – all three roads fall within the “intensification area” covered by the proposals. The association would like to express its support for the broad aims and principles outlined in the consultation document. In particular we welcome: <ul style="list-style-type: none"> <li>• Plans to upgrade the entrances and environment at both Harrow and Wealdstone and Harrow-on-the-Hill stations</li> <li>• Plans to provide a better retail offer in Harrow Town Centre with better quality shops</li> </ul>	Overall principles	Support is noted

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		<ul style="list-style-type: none"> <li>• More leisure and cultural facilities and more green space</li> <li>• A commitment to high quality standards of architecture and design</li> </ul>		
37	General	<p>There is no Management Overview. This omission is quite unbelievable.</p> <p>There is no reference to or analysis of the public debate from either earlier iterations or, the Lets Talk campaign, or, The London's Mayors Report on District Shopping.</p>	Past consultation	<p>Section 1.3 provides the management overview in terms of timetable, delivery and implementation of the AAP. Section 1.4 provided a summary of the community engagement and the results of consultation on the four broad development options previously consulted upon. As set out in paragraph 1.4.7 the analysis of the responses and how these were taken forward in developing the Preferred Option are available in the consultation report, which is available on the Council website. This analysis was much too long to include in the document itself.</p> <p>No change</p>
37	General	<p>Whilst it is clear considerable time has been spent in writing the text, the lack of designs, illustrations or, examples of the buildings which will have an irreversible impact on Harrows Street Scape, its infrastructure and impact on socio economic immigration or emigration, fails to meet expectation. There is only one illustration, page 126, which is undoubtedly not typical of the proposals. Contemporary Housing design can include ideas from Pierre Davoine to Fielden Clegg Bradley and the consultation document should at least recognise the wide interpretation developers could submit.</p>	Illustrations	<p>The Council has invested in a 3D model and is working with Design for London to input consented and proposed buildings forms that will enable 360 degree analysis. This will hopefully be made available on the Council website. Snapshots of the resultant images are proposed to be included in the final AAP to help to illustrate the changes proposed.</p>
37	General	<p>The content, which does not mention the considerable socio economic and retail changes since the plans inception in 2008, is Jargon driven and fails to meet the English Crystal Clear Standards required for public debate. For example, on page 171 Design housing to be viewed and experienced at all sides. The paragraph continues, Provide a positive relationship with the railway in terms of view and plan, is just meaningless. In addition, it is hard to recognise from some of the chapters descriptions, just where in Harrow or Wealdstone the author is standing.</p> <p>There are many good aims and objectives, including Policy statements, the difficulty are in the interpretation shown in the text which often leaves so much wriggle room, the reader could drive a bus through.</p>	Clarity of text	<p>The Council has made various amendments to the text to clarify exactly what is sought by development in each sub-area of on individual sites. Where possible, planning jargon has been removed</p>
38	General	The Harrow and Wieldstone AAP area contains some areas of	Flooding	In discussion with the Environment Agency agreement

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		Flood Zone 2 and 3a and b. If the current draft of the document was submitted without being amended we would not find it sound.		has been reached about the applicability of the 3b Flood Zone in an urban setting such as Wealdstone. Further sequential and exception testing work is being carried out to ensure the sites to be allocated are deliverable and the policies can ensure development both mitigates and reduces flooding risk.
40	General	<p>Harrow Friends of the Earth welcome this opportunity to make further representations on the 'Heart of Harrow' Area Action Plan. While we remain sceptical as to whether the 'intensification area' model of development is the most appropriate one for Harrow, we are generally pleased with the current consultation document. It takes a realistic attitude to the challenges presented by previous decisions and, for the most part, makes a genuine attempt to address the need for environmental and social sustainability.</p> <p>We do not feel, though, that the document is sufficiently emphatic in pointing out the need to abandon, within the Intensification Area, a suburban mindset associated with energy-inefficient low-density housing (for the affluent, at least) and unbridled use of the private car. In our opinion, the 'Heart of Harrow' concept will only be successful if those who live or work within the Intensification Area are prepared to accept:</p> <ul style="list-style-type: none"> <li>• car-free housing to enable high densities while avoiding high-rise and providing high-quality amenity and recreational space;</li> <li>• a 20 m.p.h. speed limit throughout the area;</li> <li>• a hierarchy of transport priorities putting the needs of people with mobility problems, pedestrians, cyclists and public transport users above those of car drivers; and</li> <li>• the possibility of congestion charging and/or charges for private non-residential parking.</li> </ul> <p>Many inner London boroughs have long realised that such measures are essential if their housing and employment targets are to be met in a sustainable way that avoids problems such as gridlocked traffic and environmental degradation. As Harrow has now decided that its inner area is to be developed in a similarly intensive way, we believe that similar action is needed</p>	Modal shift	<p>While the Council agrees with the comments of Harrow Friends of the Earth, the Council considers that the AAP represents a stepping stone in challenging the suburban norms regarding car ownership and modal shift. However, the Council remains concerned that, beyond the Intensification Area, unlike much of inner London, outer West London still does not have the transport infrastructure to support and implement hard-line policies on modal shift. In particular, and despite much lobbying of Transport for London and the Mayor, outer west London is still lacking a network of fast and reliable orbital transport links. Whilst the Mayor's latest Transport Plan includes reference to the principle of an orbital transport network it contains no proposals for its implementation at this stage. Until such time as proposals are firmed up, and adequate funding committed, there has to be an acknowledgment that private car use will still be necessary in Harrow to enable our residents to access employment opportunities elsewhere in West London.</p> <p>No change (at this point in time)</p>

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46	General	<p>I like the idea of connecting places together via green walkways. Routes for cycling need to be improved and segregated from traffic wherever possible.</p> <p>Buildings need to be built to last using sustainable materials and renewable energy whenever possible.</p> <p>A larger pedestrianised area in central Harrow would be desirable. Harrow on the Hill station needs modernising with lifts or escalators and modern train indicators.</p>	Overall principles	General support is noted, as is the desire for a large pedestrianised area in Harrow town centre, and the reiterations regarding sustainable building standards and the need to modernise Harrow-on-the-Hill station.
47	General	What happens to applications for development within the IA before its adoption?	Determining current planning application	Applications will be assessed using the London Plan 2011, Harrow's Core Strategy 2012 and Saved UDP Policies 2004, alongside guidance contained in the Borough's SPDs. As the AAP continues to progress through the various stages towards adoption, the policies of the AAP will be given more weight as a material consideration in the determination of planning applications.
49	General	<p>Our client remains encouraged that there is the focus on creating a Harrow and Wealdstone Intensification Area, and it is anticipated that the significant level of homes and jobs that are proposed will have a hugely beneficial effect on the area and wider Borough. Whilst these targets are ambitious, it is considered that they can be achieved through the right mechanisms.</p> <p>The AAP provides clear guidance in respect of what is expected within the four defined sub-areas. This sub-area approach is considered appropriate and a good way to ensure guided delivery of appropriate housing and jobs.</p> <p>Our client obviously supports the objectives of the indicative masterplan for Wealdstone Central, and endorses the inclusion of their site at 37-41 Palmerston Road within Opportunity Site 07, being available and deliverable, and a site that the LPA are aware is appropriate given discussion held to date with the land-owner and their consultant team.</p> <p>The AAP acknowledges the important role that existing sites will play in delivering housing within the areas of principal focus. This acknowledges opportunities for mixed-use developments at higher densities in tall, landmark buildings will be encouraged. These sentiments are strongly supported in the context of the clear role that our client's site at 37-41 Palmerston Road, included within Opportunity Site 07, can play in significantly contributing to</p>	Opportunity site No. 7	Support for the AAP and Wealdstone regeneration noted.



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		<p>meeting the clear objectives of the AAP. We ask you to take note of this representation, and look forward to reviewing and commenting on any future iterations of emerging policy documents in due course. As such, please retain our details on the LDF database.</p>		
50	General	<p>Land Securities, in its role as a key landowner/developer within the Borough, welcomes the opportunity to participate in this period of consultation on Harrow Council's emerging Harrow and Wealdstone AAP and is committed to remain engaged in this process in order to ensure the preparation of a 'sound' spatial plan that delivers sustainable growth in the Borough over the plan period and beyond.</p> <p>Firstly as a point of clarification, throughout the document reference is made to 'the Kodak site' and 'Zoom Leisure site'. We would request that these references are removed as they are not appropriate in the context of the life of the AAP over the next 15 years. Zoom Leisure ceased trading in 2011 so it is no longer suitable to refer to this site as Zoom Leisure and we would suggest that it is referred to as 'Harrow View West'. Kodak is also consolidating, and has already sold some of its land to Land Securities, so we would suggest that this site is referred to as 'Harrow View East'. To ensure consistency within these representations we will refer the whole site as 'Harrow View'.</p>	Terminology	<p>Throughout the document the Council has referred to sites as they are commonly known by the local community. This is typically based on the current or previous use of the site and ensures the public can readily identify with each site being proposed. The Council is concerned that renaming sites may lead to confusion, especially where the proposed site reference is the name of the road rather than something more tangible and site specific. Experience shows that the renaming or re-branding of a site can take a significant period of time to catch on with the local community, and typically requires the redevelopment of the site to have taken place. In the context of the life of the AAP the Council is therefore more concerned with ensuring the community can connect with the proposed sites and therefore considers the colloquial site references to be the most appropriate.</p>
53	General	<p>I write regarding the Harrow and Wealdstone Area Action Plan from a long term resident of Wealdstone who has failed to see any constructive planning from Harrow Council.</p> <p>I would add that this document which we residents have been asked to consider, in the beggarly period of two weeks, raises no excitement or hope in this writer. In fact the opposite.</p> <p>Before I comment on matters from the Heart of Harrow document, may I describe why my wife and I wanted to come to Harrow to live and raise a family.</p> <p>In the 52 years I have been a resident of Wealdstone I have seen the High Street change from a village atmosphere which included a butcher who received live cattle every month, and who slaughtered and butchered them to customers tastes, a wet fishmongers who smoked his own fish and eels, and an iron monger which was a shop full of every item one could wish to find in boxes, hanging from the ceiling, or downstairs in the cellar. And</p>	The deterioration of Wealdstone	<p>The concerns are noted and are shared by many in the community. Unfortunately, the days of our high streets being populated by independent butches, fishmongers, iron mongers and bakers etc are over. The retail market has changed significantly in recent years, as have shopping habits, and our high streets have struggled to cope with such rapid change. Likewise our communities are changing as noted. While many parts of Harrow still enjoy a strong sense of community, other parts do not. The AAP proposals for Wealdstone seek to address its current decline through new employment growth and improvements to the environment and standard of development. While it is hoped that such measures will go some way to fostering a more cohesive community spirit in the area, it is beyond the scope of the plan to address many of the wider social issues raised, such as</p>

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		<p>many more of the same ilk.</p> <p>My road when we moved here was a neighbourly road, where a young couple like us were welcomed by our neighbours with offers “of any help needed”, or “ let us know if you need anything”.</p> <p>A peaceful and quiet, leafy green borough with its own efficient education authority, clean safe streets at night time and a safe happy place to bring children into the world to become solid British Citizens.</p> <p>Now our High Street is a melange of Burger bars, betting shops, kebab houses, and Middle Eastern greengrocers with goods all over the pavement and pound shops to name some. There are even retail shops that contain accountants and solicitors who sell no retail goods that the shops are for.</p> <p>The houses in our street are now full of foreign people who have no wish to be neighbours. Our street, like all roads in Harrow has become an open car park, as all the roads in Harrow have become. My wife will not venture outside at night alone. We still suffer the same flooding to my house that has occurred for 50 years with no interest or help from the Council.</p> <p>So by now I hope you can see why I am so critical of the past 50 years of planning by Harrow Council, and have no hope raised by this new Planning dream that we are being asked to comment on. In fact the very name Intensification describes my feelings about it. In the past 50 years it appears that Harrow Planners have given carte blanche to developers to concrete over every piece of ground they were asked for, without the thought for energy requirements, water services or refuse disposal.</p> <p>To illustrate my point I remember the old driving centre in Alexandra Avenue was closed and sold off to developers. The allotments adjacent to Kenmore Avenue and Byron Park were closed and the Driving Centre open here. Suddenly this new Driving Centre disappeared and a Council Dump appeared and disappeared, and now, suddenly Houses will be built upon it. Green ground to concrete. Progress? I think not and I am not a greenie.</p>		<p>neighbourly behaviour. However, it is important to note that all of the sites proposed for development in the AAP are sites with existing development on them. The adopted Core Strategy is explicit about there being no further net loss of Harrow’s existing open spaces, and the AAP conforms to this.</p> <p>No change</p>
53	General	<p>I asked your representatives at one of the drop in sessions, where will all the water be coming from for these new houses? He said Veolia (aka Thames Water) are happy with this building. Of course they are happy with these works as they will collect their water</p>	Utilities capacity	<p>The concerns are noted. Both at the local and regional level, discussions have taken place with utility providers to understand limits on network capacities or enhancements required to accommodate further growth.</p>

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		<p>charges every year. Whether they will be able to supply water to these buildings or not. Veolia have not built any new reservoirs in my memory and the present residents of Harrow have suffered water shortages with them before.</p>		<p>While the Council does rely on the utility provider to confirm this, we also note that providers are regulated and are required submit and get approval for their service plans, which are to include renewed, new or enhanced infrastructure. Nevertheless, the Council is not complacent. The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. However, the AAP does expand on this by including policies that require new development to take a long-term view of energy and water efficiency including the creation of a district energy network.</p> <p>No change</p>
56	General	<p>I read with interest your leaflet regarding the 'Masterplan' for Harrow's development over the next few years. It is full of fine words with very few specifics. Whilst I appreciate that a 'vision' is necessary to then evolve plans, it always seems that any consultation always results in the residents of Harrow having to put up with more and more unattractive buildings dotted around the town, that never appear to have any relation to what they have asked for need. The Council's agenda, even if foisted upon it by Central Government, always holds sway and we end up with more high rise, more non-vernacular, and identikit brutalist eyesores. In particular I would like to point out that as far as I am aware there is not one resident calling for a 'tall landmark building to put Harrow on the map' (if there is I really would like to meet them). By this I believe you refer to the continued obsession by Dandara, and some elements of the Council, to build a high-rise building to challenge the current landmark building of Harrow, the spire of St Mary's. Why does it need to be so tall? If you need more land for offices or flats, how about building over the Civic Centre car-park, or Kodak or Col-Art. In fact there are already plenty of empty offices in Harrow, why build more?</p>	Design standards and tall buildings	<p>In the absence of a plan for growth, the Council and the community will continue to have to react to proposals by developers, who will try and set the agenda for new development in Harrow. Dandara and Neptune Point being recent examples where the Council and community have not fully supported the proposals but where on appeal, and in the absence of a wider context, the principle of development has been demonstrated through site specific evidence.</p> <p>Where decisions have already been taken, either by the Council or otherwise, this must be acknowledge in the AAP. However, the importance and need for this AAP remains. It is essential that the Council and the community begin to set out our plan for the future development and growth of this area, and not just in terms of tall buildings but in respect of the types of development and the contribution of each to the vitality of our town centre and the ability to address key issues affecting the area.</p> <p>Some taller buildings will be necessary to meet planned levels of growth. Much work has been undertaken to ensure the building heights proposed are suitable to their immediate location and add to rather than adversely</p>

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				<p>impact upon the character of the area. Further changes have been made to strengthen the policies on building heights.</p> <p>The Civic Centre, Kodak and Colart are already included as proposals site in the AAP that will make a significant contribution to housing and employment numbers. With respect to offices, the reasons for the high levels of vacancy are due to the current age and inefficiency of the current stock. The levels of vacancy also mean there is no market for new office development as existing rent levels are too low. The AAP proposals are therefore about office renewal.</p>
56	General	<p>If you really want to make the centre of Harrow a place to be proud of, why not build a new Arts complex right on that site (Dandara). A theatre, gallery, central library right next to a main transport hub would be wonderful to rejuvenate the centre of Greenhill. Swop the site with Elliot Hall and the current Arts centre in Hatch End, worth I'm sure far more to property developers even if they had to work with certain criteria laid down by the listed buildings on the site. Indeed what an opportunity to build decent homes in a lovely setting surrounded by Green Belt in Hatch End, whilst giving Greenhill and the centre of Harrow something really worthwhile right in the heart of our Borough.</p> <p>Harrow could once more be a lovely, vibrant town, please don't throw this chance away by ignoring us. We have to live with what you do.</p>	Allocate site in the town centre for community use / theatre / library / gallery	<p>The AAP includes the requirement for development of 51 College Road to provide a new central library, replacing the Civic Centre and Gayton Road libraries. The full specification of the new library has yet to be confirmed but is likely to include exhibition/gallery and community meeting room spaces. There remain significant issues with the long-term viability of providing a theatre within Harrow town centre. However, options for provision are still being explored, especially through the relocation of the Council's Civic Centre into Harrow town centre and shared use of any newly created democratic space.</p> <p>While the Harrow Arts Centre at Hatch End is not ideally located to serve all in the borough, it does represent significant investment and continues to be well supported and heavily utilised. Until such time as proposals for new arts provision have been firmed up, the Council will continue to support and retain this important facility.</p>
Anon 2	General	24 hour surveillance re: gun and knife crime. A constant scanner at bus and tube station.	Crime	<p>The Council would support such a proposal; however this is a matter for Network Rail and Transport for London as owners and operators of these transport facilities and is pertinent not just to the AAP area but to the borough and across London. The Council will therefore continue to liaise with these organisations, as well as the MET Police, over this and other crime and safety prevention measures that could be implemented as part of any upgrade to key public transport facilities.</p> <p>No change</p>

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Anon 2	General	<p>I believe the Action Plan is stupid as do many other who live in and around Harrow. We are already over populated locally with our industrial land is being replaced by yet more flats and shops. It appears to me that Harrow Council are ashamed of the famous landmark of Harrow Hill and are trying to hide it behind shops and flats. Shame on you.</p> <p>You just ignore us. It is like the proposed developments around Harrow on the Hill station, the section 106 to provide a private (i.e. useless) bridge across the railway! It is to carry the services, that is not a benefit to the community.</p>	Objection to concept	<p>The example provided is the reason the Council considers the AAP to be essential. In its absence, development will still take place and will include site specific mitigation measures that have little relationship to wider needs of the area.</p> <p>The Council is certainly not 'ashamed' of the famous landmark of Harrow Hill. However, the Council remains convinced that the preservation and maintenance of the iconic Harrow Hill is not incompatible with development and growth of Harrow town centre, especially if supported by robust policies underpinned by sound evidence. Policy AAP8 therefore seeks to ensure development is required to enhance the setting of Harrow Hill.</p> <p>No change</p>
36	General	<p>The present version of the area action plan outlines the vision for central Harrow clearly and goes some way in explaining how it might be achieved. The emphasis on good design and creation of interconnected public realm is encouraging. However some aspects are dealt with too superficially and others need clarification</p>	Detail of text	General support is noted
26	General	<p>The Governing Body wishes to record its concern that a public consultation document, which includes specific references to Whitefriars Community School had not been referred to it for comment prior to publication. Experience has shown that publicly expressed proposals such as these which create uncertainty about the continued existence of a school or changes to its location, can cause inaccurate impressions, unsubstantiated rumours and have a damaging effect on the school in the local community.</p>	Public consultation	<p>Comments are noted and have been addressed through changes to text and supporting diagram for the Teacher's Centre site. <b>[Need to consult the Board of Governs on the draft]</b></p>
20	Support for various paragraphs	<p>We submit representations on behalf of Redefine International plc, freeholders of Lyon House and Equitable House, Harrow and applicants for the planning application submitted on 11 November 2011 for:</p> <p><i>"Demolition of Lyon House and Equitable House and redevelopment to provide new residential units including affordable accommodation, new offices (Class B1) and ground floor units for use for either Class A1, A2, A3 or D1 with landscaping and public realm works."</i></p>	None	Support for various paragraphs is noted.

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		<p>These representations augment those submitted in January 2011 to the Core Strategy Preferred Options Consultation and June 2011 to the Issues and Options Consultation and Draft Site Allocations DPD.</p> <p>Our comments are in <b>bold</b>.</p> <p>In particular Redefine <b>supports</b> the following (paragraph references refer to the AAP): 3.3, 3.6.7, 4.3, 4.4.3, 4.5.1, 5.1, 5.1.2, 5.1.20, 5.1.41, 5.1.50</p>		
34	Design	<p>We would like to see an emphasis on carbon neutral design and, where possible, the incorporation of solar panels and wind turbines and other “green” building techniques and features, especially on large-scale developments.</p>	Sustainability	<p>The AAP forms only part of the development plan for Harrow. The new London Plan includes detailed policies regarding carbon reduction targets for residential and non-domestic buildings (Policy 5.2). It is therefore not necessary to repeat these again in the AAP.</p> <p>No change</p>
34	Public Realm	<p>Plans to enhance Harrow town centre, Wealdstone and Station Road must be complemented by regular street-cleaning and an onus on shops, businesses and landlords to maintain the area directly outside their properties. The litter-strewn area outside the Costcutter store on the corner of Rosslyn Crescent and Station Road is an example of a shabby, ill-kempt curtilage, which creates an unfavourable impression. We believe roads in mixed-use areas, such as the three roads that make up HCRA, need more regular cleaning than streets solely made up of residential properties as our three streets suffer from litter from nearby businesses, industrial properties and the higher volume of traffic and people passing through.</p>	Public realm	<p>The issue of on-going maintenance and street cleaning is a service matter for the Council’s Urban Realm team and is unfortunately outside of the scope of the AAP. Where applicable, the Council does take enforcement action out against premises that fail to maintain an acceptable level of forecourt cleanliness.</p> <p>No change</p>
34	Public Realm	<p>The plan promises road resurfacing, and improvements to pavements in Station Road. We think this should extend into feeder roads such as Rosslyn Crescent, Woodlands Road and Frogna Avenue, where the road surfaces and pavements are badly in need of repair.</p>	Public realm	<p>Much of the funding for the enhancement of the public realm and improvements to Station Road will come from new development. The ability to extend improvements beyond Station Road will depend on the levels of funding secured and other priorities for social and physical infrastructure provision. In the event that such funding is unable to extend to feeder roads, any new road surfacing and pavement replacement will need to be delivered through the Council’s highways maintenance budget.</p> <p>No change</p>
37	Employment	<p>There is no business plan to support statements of increased employment opportunity, no new retail markets identified to</p>	Employment targets	<p>The evidence base in terms of the requirement for new retail development is provided in the Retail Study (Sept</p>

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		<p>combat the decline in comparative shopping or plans to address the impact large scale building of social housing will have on retail income and its mix in Harrow or Wealdstone. It is especially worrying that the document maintains in Site Specific Guidance the creation of 2500 jobs whilst on page 66 it states efforts to secure wider use of old industrial land for employment opportunities have not been successful. Reliance on housing projects in themselves creating and developing new Local IT and small scale business in the service sector and subsequent inward investment is at odds with typical social housing project outcomes.</p>		<p>2009) undertaken by Nathaniel Lichfield and Partners: <a href="http://www.harrow.gov.uk/downloads/file/7390/harrow_retail_study_september_2009">http://www.harrow.gov.uk/downloads/file/7390/harrow_retail_study_september_2009</a> . This highlights that the retail sector is the third largest employment sector in Harrow but is only forecast for modest growth. This evidence has been used to prepare the Local Economic Assessment, which is effectively the Council's business plan for Harrow's economic growth and is available via the following link: <a href="http://www.harrow.gov.uk/downloads/download/2793/local_economic_assessment">http://www.harrow.gov.uk/downloads/download/2793/local_economic_assessment</a> . This further highlights that fact that Harrow Town Centre is regarded as one of the country's least risky towns and therefore less vulnerable to retail collapse/closure and best placed to withstand a weakening retail economy. Overall the AAP seeks to promote housing, leisure and entertainment uses, alongside urban realm, office and transport improvements to drive comparison retail demand. The provisions of Policy AAP15 C only apply where all other efforts to retain the existing business use on the site have been explored and exhausted. In such circumstances mixed use development proposals are considered acceptable where it is demonstrated that the new housing provides for enabling development (i.e. that it secures new employment opportunities on the site that would otherwise not be viable in either past or current market conditions). It should be noted that the new homes to be delivered through the AAP are a mix of both private market, and where viable, affordable (social) housing. No change</p>
37	Retail	<p>The London Mayors Report on District Shopping and, the central plank Retail forms in the development of Harrow and Wealdstone, highlights the need to be very clear how comparative shopping trends will develop and the impact this will have. Factory Outlet shopping developments in the UK and Europe are seen as one approach to mitigate internet shopping. Examples include Bicester and Freeport Braintree. Harrow is quoted as behind the curve of successful Town development such as Ealing, Watford,</p>	Retail development	<p>Harrow's retail sector is only forecast for modest growth. The AAP, in line with national and regional policy, maintains the 'town centre first' principle for new retail development. With respect to the AAP, it acknowledges that other initiatives are required to support existing and new retail development in the town centres, including new housing, leisure and entertainment uses within the town centres, alongside urban realm, office and transport</p>

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		<p>Uxbridge and many others. This shortcoming was made public in 2008 by The Member of Parliament for Harrow East, Tony McNulty, who was responsible for the success of Uxbridge.</p>		<p>improvements to drive comparison retail demand. The recent Mary Portas review into the future of our high streets highlights the issue of out-of-centre malls and the inability of centres to adapt to convenient, needs-based retailing, especially internet shopping. Against this changing retail landscape, the Council considers a conservative (in terms of quantum) and flexible (in terms of adaptability to change) approach, as set out in the AAP, is advisable. No change</p>
37	Housing	<p>The Heart of Harrow proposals are at odds with the success of these Towns who have built social and for sale property which is both distinct and visually attractive. Harrows proposals specifically refer to flatted developments. Such developments in Harrow are already seen as eye sores and building more will not create the desire for socially mobile or entrepreneurial couples or individuals to move into the area which is key to Harrow's success.</p> <p>The building of social housing with more than 3 bedrooms is contentious. There are many owner occupiers and Council House tenants whose children share a bedroom and encouraging applicants to move to Harrow and to have large families so jumping the queue will be offensive.</p> <p>A possible reason why Ealing and Uxbridge are successful is because their Planning Department, Councillors and residents have protected and complimented their street scape when setting the agenda for developing their Towns. Watford Council are zoning housing designs to compliment the area type which in turn attracts a wider range of residents, creating the social mix necessary to support retail business.</p>	<p>Concern over the amount and design of flatted development s proposed</p> <p>Concern over the creation of social housing – and who will move in</p> <p>Need to zone housing designs to compliment the area</p>	<p>The London Plan, Harrow's Core Strategy and the AAP all seek high quality residential development. Sites within the AAP offer the opportunity for modern contemporary residential designed developments. The AAP proposals are for flatted development within the town centre boundaries not across the area as a whole. It is not considered appropriate to seek family houses within the existing built-up environment of our town centres. However, across the whole of the Heart of Harrow area, the AAP seek to provide an appropriate mix of both flats and houses of a mix of sizes and tenures (private and affordable). Outside of the town centres, sites such as Kodak, Colart, the Driving Centre and the Civic Centre sites will balance out the flatted town centre schemes through greater provision of family housing. The need for family affordable housing is well demonstrated through the existing Strategic Housing Market Assessment.</p> <p>As with the examples provided, the AAP recognises that the Heart of Harrow area is made of places with very different existing characters. It therefore divides the area into seven sub-areas, ensuring new development respects the existing or drives a new distinct urban character within each sub-area. No change</p>
37	Design	<p>The Heart of Harrow suggests a Metroland dimension to the proposals which, notwithstanding the flatted and high rise building design are not, could and should be the objective of the plan. Ironically, whilst Harrow Council is prepared to generate revenue</p>	Attractive design	<p>The references to Metroland character are a desire to see the best elements of Harrow's suburban character maintained across the area as a whole in terms of green spaces and quality street environments but certainly not</p>



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		<p>from home owners by, for example, charging for street parking which has removed many front gardens, destroying the Metropole ambience so sought after by selective home buyers and potentially employers; no penalties are in force which has prevented the destruction of Harrows street scape by local business and residents. For example, the removal of architecturally important features creating a blandness of shop frontage and the installation of Satellite Dishes on the front of buildings, many of which are Council owned, has made Harrow look so run down and unattractive to investors and visitors alike.</p> <p>The boldness of the plan must be matched to market demands and, in recognising existing visual shortcomings, define imaginatively designed building which will attract the attention and visit to Harrow by investors and shoppers alike.</p>		<p>in terms of the built form, where the expectation is for new modern contemporary developments that add value and interest to an area, establishing a new 21<sup>st</sup> century Metroland character for this area. The text and policies have been amended where necessary to reinforce this desire.</p>
38	Flooding	<p>We notice that your Strategic Flood Risk Assessment (Level 2 SFRA) June 2011 does not include existing built footprint within the functional Floodplain (Flood Zone 3b). Flood zone 3b is not suitable for highly vulnerable, more vulnerable and less vulnerable development use classes. It is also not suitable for the sequential test. This is in accordance with Table D.3 in Planning Policy Statement 25- Development and Flood Risk.</p> <p>Some of your site allocations fall within flood zone 3b (though the existing built footprints does not) you will need to carry out one of the following options before you embark on the Sequential and if necessary exceptions test for these areas;</p> <p>Identify alternative sites outside Flood Zone 3b, or review your modelling and determine whether it is possible to amend your Level 2 SFRA, removing the Flood Zone 3b designation, or add a policy stating that the built footprint and vulnerability classification of sites in Flood Zone 3b will not be increased and; safe access and egress will be provided from the site during a flood event or a suitable emergency evacuation plan will be produced following consultation with your emergency planners. The logical place to put this would be the "design considerations" section for each site in flood zone 3b. You should also reference the recommendations sheets included in your Level 2 SFRA here. The Sustainability Appraisal does not include reference to the Level 2 Strategic Flood Risk Assessment in the text. Mentioning</p>	Flood zones 3a and b in Wealdstone	<p>In discussion with the Environment Agency agreement has been reached about the applicability of the 3b Flood Zone in an urban setting such as Wealdstone. Further sequential and exception testing work is being carried out to ensure the sites to be allocated are deliverable and the policies can ensure development both mitigates and reduces flooding risk.</p> <p>The updated recommendation sheets are referenced in the 'design considerations' for the relevant individual site allocations and the Sustainability Appraisal has been updated as suggested.</p>

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		<p>the Level 2 SFRA in the evidence base is not enough. This must be amended before submission.</p> <p>Without these changes the AAP will not be Justified as it is not based on robust evidence.</p>		
38	Sequential Test	<p><b>The Sequential Test</b></p> <p>The sequential and if necessary exceptions tests have not yet been carried out. I understand from your email of 13 February that you will be commissioning a Sequential test before the pre-submission consultation. This document should inform the location of development within Harrow and Wealdstone, ensuring that vulnerable uses are located in the areas of lowest flood risk. The Sequential test will also need to be referenced in your Sustainability Appraisal.</p> <p>Without addressing the above the AAP would not be Justified as it is not based on robust evidence.</p> <p>Without addressing the above the AAP would not be Effective as it may not be capable of being delivered if sites selected for development are refused planning permission due to failing the sequential test.</p>	Flood zones 3a and b in Wealdstone	<p>Further sequential and exception testing work is being carried out to ensure the sites to be allocated are deliverable and the policies can ensure development both mitigates and reduces flooding risk.</p> <p>The Sustainability Appraisal has been updated as suggested.</p>
42	Gardens	<p>There are proposals for family accommodation but we haven't seen sufficient reference to private gardens. Most families want gardens both for children to enjoy without needing close supervision and for crop growing. The latter could be catered for by provision of allotments – would there be additional space provided for them?</p>	Private gardens and allotments	<p>Developments which include family homes are expected to include provision for private gardens. All other forms of residential development are required to make provision for on-site communal amenity space and children's play space. Where there are justified reasons why the amenity standards cannot be meet on site, a contribution towards off-site provision or enhancement will be required, which may include additional allotment space.</p>
45	Community Facilities	<p>I wish to strongly commend the planning team for a well thought out document which does address issues that have been missed by a number of planning authorities.</p> <p>Particularly I would like to commend on the strong intentions to preserve and extend community facilities which are so vital. However there is one aspect that appears to have been overlooked that of the need for D1h which I do not see.</p> <p>The trend in many cities is that under used churches etc are closed and sites re-used for needed housing. This causes a dramatic shortage of D1h facilities for the growing need for places of worship, which has a knock on effect of a lower quality of life</p>	<p>Need to allocate sites for D1H facilities</p> <p>Introduce policies to protect the diminishing D1 sites and</p>	<p>Support is noted. It should also be noted that the Harrow Core Strategy also includes places of worship within its definition of community facilities and includes Core Policy 1Z which resists the loss of community facilities unless adequate arrangements are in place for their replacement or the enhancement of other existing facilities. This is a higher order overarching policy, so it is not necessary to repeat this policy again in the AAP.</p> <p>The Council also notes that the AAP area, and its immediate surrounds, already has a significant number of dedicated places of worship representing a wide</p>

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		<p>leading to problems with crime etc.            If this need is not addressed at this level of forward planning the problems will gradually escalate. For the plan to be sustainable sufficient levels of D1h facilities must be provided. As this plan follows many of the principles of the 'London Plan' it should be noted that these issues are addressed therein for example &gt;&gt;            3.86 Social infrastructure covers a wide range of facilities such as health provision, nurseries, schools, colleges and universities, community, cultural (Policy 4.6), play, recreation and sports facilities, Places Of Worship, fire stations, policing and other criminal justice or community safety facilities and many other uses and activities which contribute to making an area more than just a place to live.            My Recommendation would therefore be:            1. Introduce policies to protect the diminishing D1 sites. Some Councils seek and maintain a list of organizations who may require facilities and when a planning application for change of use comes in they give the list to the applicant instructing them to write to all on the list advising the availability of the site.            Only if it is unsuitable for all will they then consider the application to change the use from D1. This gives little work to the planning dept and is very effective.            2. On large developments ensure that provision is made to provide both general D1 and also D1h.            3. The Council should ACTIVELY assist D1 and D1h class groups who are seeking sites (not with finance but to find a site)            4. Some planners are promoting multi-use buildings to save resources. <b><i>This can work well with D1 but generally cannot work with D1h class</i></b>            (Can you see a synagogue and mosque share the same facility?)            Generally each religious group must have its own centre.            If these points are introduced into the plan then future problems will be avoided in trying to find facilities or sites after they have disappeared, as it is put in the London Plan ---- "Making an area more than just a place to live."            I would welcome the opportunity to meet with the inspector if it would be helpful regarding the D1-h aspect</p>	<p>require provision of D1 facilities on large developments</p> <p>Provide assistance in finding sites</p>	<p>variety of faiths. These include the Central Harrow Mosque, the Harrow &amp; Wealdstone Baptist churches, the Trinity Methodist Church, St Paul's &amp; Holy Trinity Church of England churches, the Harrow International Christian Centre, the London Ayyapan Temple, the Wealdstone Evangelical Church, the RCCG House of Joy of All Nations, the Middlesex New Synagogue, the Shree Kutch Satsung Swaminarayan Temple, the Harrow Spiritualist Church, the Harrow &amp; Wealdstone Progressive Synagogue, and the Catholic Church of Our Lady &amp; Saint Thomas of Canterbury.            While the Council does seek provision for or includes D1 uses within appropriate site allocations, these are, as suggested, for community facilities that can be used for a wide variety of activities including as a place of worship by different faith groups. Where a faith group wishes to have its own facility, they will need to purchase the site or part of the site to enable this. The Council already actively encourages faith groups to talk with us about their current and future requirements for new community facilities. We particularly welcome working with these groups in selecting sites for new facilities as, depending on the size/capacity, such facilities can give rise to adverse impacts if inappropriately located. Such site selection is not limited to one area but covers the whole borough.            With regard to a list, the Council is required under the Localism Act 2011 to keep a 'list of assets of community value'. These are assets owned by public bodies that the community can 'flag-up' as having an interest in. Should the public body decide to dispose of an asset on the list, sufficient time must be provided to enable community groups to raise the funds to purchase it. Harrow's list of assets of community value is currently being compiled and will be available shortly to view on the Council's website.</p>

## Tall Buildings / Views

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25	Building Heights	<p>We were led to believe that there would be specific guidance on this for Harrow in the AAP. However we are disappointed to note that at para 5.1.45 the consultation document merely repeats what is already in the London Plan and the Core Strategy. Certainly it promises that the AAP will provide “locally specific criteria ..... when assessing proposals for tall buildings within the Harrow &amp; Wealdstone Intensification Area.” However the Design Considerations set out for each key site do not achieve this. For example, Wealdstone Central Design Considerations include:</p> <p>“ – Maximum six storeys for main blocks – additional storeys requiring special justification based upon additional outcomes or architectural/design considerations”</p> <p>And Lyon Road Design Considerations include:</p> <p>“ – The northern building may be taller than others, to provide one of the ‘special character’ buildings along Station Road, and to benefit from large public realm opportunity adjacent.”</p> <p>These could in no sense be described as “specific criteria”. Consequently the door remains open for developers to try and work round them.</p>	Lack of guidance on tall buildings	The AAP Policy 6 has been the subject of significant amendment to take account of the comments made regarding building heights and tall buildings. It now provides cleaner definitions of taller and tall building, clarify the role taller and tall building are to play in delivering the spatial strategy for the Heart of Harrow, and the assessment criteria have been developed further
25	Views	<p>a) We draw attention to the error on the diagram at page 51 of the consultation document. The protected view labelled as ‘Roxborough Road footbridge’ is in fact the view from the Cunningham Park entrance to Harrow Recreation Ground. The additional, though partly overlapping view needs to be shown and the labelling corrected.</p> <p>b) The demolition of the present buildings at 51 College Road will open up new views of the Hill which will have a beneficial effect on that end of College Road generally. These will need to be taken into account in the re-development of that site.</p> <p>c) We note the intention to open up roof areas of tall buildings as viewing platforms, not only for residents, but also for visitors. There are a number of issues here, including safety of the public, access to otherwise private areas etc. We suggest that</p>	<p>Error in diagram</p> <p>New Views potential</p> <p>Restrict public access</p>	<p><b>Diagram has been amended</b></p> <p>The potential for new views to be established is incorporated into the site allocation for this site.</p> <p>Noted – this requirement has been removed on the basis of concerns with its application – however, the potential</p>

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		the facility should apply to only one or two specific buildings and that visits might be restricted to the annual September London Open House weekend.	to viewing areas	to establish them where viable will remain in line with London Plan policy.
27	Building Heights	<p>The Area Action Plan aspires to recreate the past glories of Harrow when it was regarded as the 'Capital City of Metro-land in London'. This is a worthy aim and reflects the pride that the local community has in its borough. However, the original 'Metro-land' was mainly low-rise residential housing with plenty of separation and open space most of which has been infilled over the years. Buildings of 4 storeys or more tend to look odd and out of place in and around Harrow. The older shopping centres of shops with 2 storeys of flats above them have a certain character which more modern concrete constructions tend to lack.</p> <p>Most of the high rise towers of flats build in the 60s have been demolished because they created a disconnected society. We don't want to recreate the problems. The new development at Neptune Point already looks out of place; disrupts the ambience of the area and it is not finished.</p> <p>I would urge the Council to remove any suggestion that new developments could be more than 4 storeys.</p>	Restrict the height of buildings to 4 storeys	See amendments made to Policy AAP6 which provides a more definitive definition of taller buildings based predominant surrounding building heights. This makes it more flexible and applicable to the local context than the application of a blanket fixed height. In addition, restricting development to a maximum of 4 storeys would not be viable, especially where the existing building may already exceed this threshold. In the context of Harrow town centre, this would effectively 'kill-off' any and all of the existing redevelopment opportunities identified. This therefore does not represent an appropriate or sustainable approach, and would lead the AAP to be found unsound.
46	Views and Tall Buildings	<p>I have looked quickly through the consultation document and attended a talk on it. Generally I am supportive of the proposals. A vast amount of good work has gone into them.</p> <p>My main comment is that the success or otherwise of the plans lies in the detail of the implementation.</p> <p>We do not want 19-storey developments in the centre of Harrow. We need good sightlines for St Mary's, Harrow from all parts of the Borough. Just because you can't see the view from College Road doesn't mean we can have tall buildings blocking the view from other parts of the Borough.</p>	Concern over tall buildings and their impact upon the Hill	General support for the AAP is noted. With respect to the 19 storey building, the principle of this has already been accepted by the Secretary of State. See comments in respect of Chapter 5 Policy AAP6 and the amended Policy AAP6
48	Tall Buildings	<p><u>Tall buildings</u>. Developers may want high rise to make sure their projects are viable, but too many too tall buildings will change the neighbourhood unacceptably. If the building on the old Post Office site is a certain height [which seems inevitable after the Inspector's ruling], other developers should not be allowed to use this as a precedent. There needs to be a limit overall to the number and height of tall buildings. If 'Metropolitan' justifies tall buildings, Harrow is a suburb not a metropolis, in danger of losing its character with too many high rises.</p>	Limit the number and height of tall buildings	The AAP Policy 6 has been the subject of significant amendment to take account of the comments made regarding building heights and tall buildings. It now provides cleaner definitions of taller and tall building, clarify the role taller and tall building are to play in delivering the spatial strategy for the Heart of Harrow, and the assessment criteria have been developed further.

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		<p>Parts of Station Road have a pleasant neighbourly character with small food shops and places to eat. 'Smartening up' could threaten this as a consequent rise in rents/prices means we will lose yet more small independent shops.</p> <p>Two areas of Harrow which seem to me to need attention are the underpass at the top of the Pinner Road, which is frightening for pedestrians, especially after dark, and the place in College Road opposite the bus station where cars drive over the pavement [far worse than the traffic through the pedestrianised St.Annes Road]. I have lived in Grange Road, Harrow for 38 years. The document is dense so I have only touched on a few areas which cause me concern.</p>	<p>Loss of independent shops</p> <p>Pedestrian safety</p>	<p>Based on past experience elsewhere within the borough, the Council does not consider that the 'Smartening up' of Station Road will result in a loss of independent shop.</p> <p>The underpass is being upgraded and enhanced as a requirement of the Neptune Point development. With regard to the road network around the Bus Station, this will be considered as part of the redevelopment of the Station.</p>
52	Tall Buildings / Views	<p>So far as tall buildings are concerned we would not wish to have any building in the town centre higher than the current highest building datum.</p> <p>The views of St Mary's on the shoulders of the Hill surrounded by the plain of Harrow around it is a significant attraction for the School and for visitors to the Hill and should be preserved. The views to the hill are very important for our image and that of the Borough. Those out from the Hill are equally important benefit for us and the community.</p> <p>In that sense we endorse the Harrow views assessment evidence base document as a valuable approach, but criticise some of its conclusions relating to tall buildings which seem to ignore its previous analysis. The views it relates to need to be preserved including their setting without interruption by tall buildings, and views from the Hill across the town centre warrant an equal level of protection.</p>	Limit height of tall buildings	<p>The AAP Policy 6 has been the subject of significant amendment to take account of the comments made regarding building heights and tall buildings. . With respect to placing a limit based on the current highest building, this would not acknowledge the principle that the Secretary of State has already confirmed that a 19 storey building on the former post office site is acceptable. It would also fail to acknowledge that even buildings below the highest currently in the town centre, if inappropriately located would block views and result in dominance etc. See comments in respect of Chapter 5 Policy AAP6 and the amended Policy AAP6</p>

## Transport / Parking

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24	Transport	Transport for London (TfL) has enjoyed active engagement in the ongoing production of this DPD and strongly supports the	Transport policies	Support and the continued engagement of TfL is welcomed, especially in the consideration of appropriate

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		<p>objectives of the Harrow and Wealdstone Area Action Plan. Both the GLA and TfL will continue to engage positively with the Council to refine the content of transport policy within the Area Action Plan.</p> <p>The DPD contains an accurate overview of the primary transport issues in the area, including highway congestion, poor east-west connections, and the scope to improve bus capacity.</p> <p>The commitment to ensure that development proposals contribute to overcoming these issues is strongly supported, as is the recognition of the potential to enhance interchange facilities at Harrow-on-the-Hill.</p> <p>Following the issues and options consultation stage, TfL has been working with the Council to assess the likely cumulative impact of development at the opportunity sites within the intensification area. This process has made use of the TfL sub-regional strategic transport models, and has also considered the implications of future growth elsewhere in the borough, combined with the growth assumed within the London Plan. Based on the preliminary results of the modelling it is evident that a number of junctions within the intensification area will experience a higher level of congestion as a result of intensification. In response to this TfL is continuing to work constructively with the Council and with developers, to secure packages of appropriate interventions/mitigation measures, to support development proposals within the intensification area, and to help deliver the improvements sought by the Area Action Plan.</p>	<p>Ongoing work on transport modelling for key junctions</p>	<p>interventions/mitigation measures to address identified capacity issues at junctions and to develop wider transport proposals to help deliver the package of transport improvements sought by the Area Action Plan</p>
25	Road Traffic	<p>It is known that Intensification, or Smart Growth as it is called in North America, can reduce urban sprawl and traffic congestion outside the intensification area at the expense of extra congestion inside the area. This occurs in spite of attempts to deter people from owning cars and applying high charges to those who retain them. Congestion means that internal combustion engines, which will predominate over electric for several decades, run inefficiently and emit more carbon dioxide and pollutants. The consultation document acknowledges that Harrow suffers road traffic congestion and that a number of junctions are likely to experience increased traffic flow due to the proposed redevelopments. All residents, drivers or not breathe the polluted air, which causes an increase in breathing related illness, and ultimately an increase in</p>	<p>Congestion and the resulting impact on air quality.</p>	<p>Much of the traffic congestion affecting the Borough and the Heart of Harrow area is caused by through traffic, not by journeys that commence or terminate in the borough. While new development will add to the existing congestion, increasing road capacity is not the solution. This will only encourage greater through traffic and see any road capacity created quickly consumed. The Council acknowledges that congestion and waiting times can lead to air quality issues. Therefore, the work we are undertaking with Transport for London is looking at traffic smoothing measures that can be implemented, alongside a package of other soft transport initiatives to promote and facilitate modal shift within the AAP area.</p>

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		<p>death rates compared to less polluted areas. Congestion is a non linear phenomenon; a small increase in the demand for road space can lead to disproportionate increases in waiting times, causing delays to essential road users including buses, unless priority measures are implemented. Thus it would run counter to the aims of <i>Creating Growth, Cutting Carbon</i>, the Department for Transport's White Paper (January 2011). Growth is strongly related to productivity, but productivity is reduced by time wastage arising from congestion.</p>		
41	Transport	<p>HWTRA is an organisation representing Council tenants and other residents on the large Harrow Weald housing estate and other smaller estates in the area. The estate is a socially deprived area with one of the highest rates of unemployment in the borough. We are pleased that the Action Plan will create new jobs in nearby parts of the borough and that it should provide better access to recreational and heritage facilities at Headstone Manor. We are concerned, however, that insufficient attention has been paid to the impact of the proposals on traffic congestion in other areas. Our particular concern is with the Courtenay Avenue and Harrow View corridor. We hope that no development occurs there that will add appreciably to the existing level of traffic. The single-deck H14 buses are already overcrowded and often delayed by traffic. This service should be improved and bus priority measures introduced. We would also like to see a new cycling and walking route that avoids the main road and gives access to the Kodak site and Headstone Manor from the east. This will require a new crossing of the railway.</p>	<p>Impact on traffic and congestion</p> <p>Bus route capacity and new ped/walking route over the railway</p>	<p>Support for job creation is noted. The development of the Kodak site will result in impacts upon the Courtenay Avenue and Harrow View corridor. These have been modelled and appropriate mitigation measures are currently being reviewed with Transport for London and the developer <b>Discuss with Transport the H14 bus</b>. The development of the Kodak and Zoom Leisure sites will see the creation of a new green link from Headstone Manor through to Wealdstone</p>
42	Parking	<p>Parking - The plans should be realistic and have provision for at least one car per household. Very few families, especially those with children would consider travelling by public transport at weekends whether it is for the weekly shop, visiting relatives or a day in the country.</p>	<p>Have a minimum parking figure for new development</p>	<p>The upper levels of the London Plan parking standards will be applied. These continue to be maximum requirements not minimums</p>
42	Transport	<p>Regarding the provision of pedestrian and cycling routes – the two modes of transport need to be separated. The legal (albeit much ignored) view is that cycling is a road activity. Unfortunately it has become common for cyclists to ignore this and to cycle on footways with little regard for pedestrians resulting in numerous</p>	<p>Refer to pedestrian and cycling separately, and provide</p>	<p>Current the Council is working with Transport for London to determine appropriate mitigation measures to address congestion. The next stage of that work will be to consider the detailed scheme proposals for the roading network in and serving the Heart of Harrow and will have</p>



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		accidents. Referring to pedestrians and cyclists together adds to this attitude.	separate paths for each activity	consideration to a range of factors including improvements to cycling and pedestrian movements
47	Cycling	<p>Provisions for cyclists – this concept is referred to frequently in the document. Need to ensure that it is realistic and not just a “current vogue”. E.g. carefully determine where cycle racks should be located and quantity, weather proof etc. There are currently too many racks in the wrong places and insufficient in the right places. Are cycling provisions also child friendly?</p> <p>Allied to provision for cyclists, the document should make explicit reference to provision for mobility scooters (storage in buildings, pathways, access routes) and similarly for children’s’ buggies. Both of these “transport modes” are of increasing importance.</p>	<p>Concern over appropriateness of cycle facility placing</p> <p>Add reference to providing other storage facilities</p>	<p>As above.</p> <p>The Development Management policy, which is applicable and referenced in the AAP, already does make provision for mobility scooters</p>
52	Traffic / Parking	<p>Whilst Harrow School land does not feature within the boundary of the Intensification Area we do have some concerns as near neighbours.</p> <p>As a major land holder on Harrow on the Hill we would wish to be reassured that no additional traffic would be sent over the Hill.</p> <p>There does not seem to be a strategy for traffic in the document and this is a worry bearing in mind the proposed intensification of residential and commercial space.</p> <p>Parking is also a major issue on Harrow on the Hill and many roads have commuter parking which reduces the spaces for residents and visitors to the Hill thus causing further congestion and problems. Businesses in and around the high Street struggle due to the lack of parking facilities and an opportunity to provide public parking was lost when the Kings Head development was approved in its final form.</p> <p>To maximise the benefit of the heritage and tourist attractions on the Hill as well as local business, a park and ride bus service from a car park at the foot of the Hill may be a benefit.</p> <p>Parking in Harrow town centre does not seem to be specifically addressed in the document and we believe this needs further consideration or this too will worsen the situation on the Hill. We see further car parks being considered on the outskirts of the Intensification Area so that cars do not have to go to the centre.</p> <p>It is also important to us that there is an attractive and safe route for pedestrians in both directions between the Hill, the tube station and the town centre. The station complex and approach therefore</p>	<p>Traffic impact on Harrow Hill</p> <p>Lack of parking facilities</p> <p>Potential to develop a park and ride scheme</p> <p>Improve the pedestrian link to the Hill from the station</p>	<p>Transport for London have modelled the impact on the road network of development proposed by the AAP. The Council is now working with TfL in the consideration of appropriate interventions/mitigation measures to address identified capacity issues at junctions and to develop wider transport proposals to help deliver the package of transport improvements sought by the Area Action Plan. He end outcome sought is a no net increase in traffic impacts over the life of the plan based on the current year as a baseline.</p> <p>Parking facilities are to be reprovided as part of development proposals that currently include parking. A detailed town centre parking strategy is also to be prepared to inform of parking space numbers, useage and reasons why these are currently under of over performing, including routing.</p>

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		need a thorough upgrade.		

## Chapter 1

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Para 1.1.4	Why should it be clearly understood that not everywhere within the boundary will be subject to intense redevelopment? There is the potential for this and the document should acknowledge that a Town Centre Design Guide clearly giving guidance on the strategy for development will give rise to greater development activity which should be encouraged.	Development throughout the area	The Council agrees that the policies of the AAP should be robust enough, and provide sufficient criteria, against which to consider proposals across the Heart of Harrow.
9	Para 1.3.1	Where is the guidance proposed for the entire area to ensure co-ordinated development over the whole area and not just on current identified sites.	Guidance for non-allocated sites	The sub-area objectives and the policies of Chapter 5 provide this guidance. No change
9	Para 1.3.4	If the Council places great importance on the ability of the local community to support the proposals, then why not listen to the unanimous objections to tall buildings?	Tall buildings	Through the Dandara appeal, although this was dismissed, the Secretary of State established that the principle of a tall building within the town centre was acceptable. While the policy on tall and taller buildings has been amended to strengthen it further, the AAP can not overcome the 'in principle' acceptance.
30	Para 1.4.6	The combination of Options 3 and 4 will maintain Wealdstone as a District Centre and Harrow as a Metropolitan Town Centre allowing both centres to develop their own distinctiveness and character whilst allowing for the regeneration of the Station Road corridor. Station Road is the only one true High Road which has the capacity to be redeveloped. Harrow View, running from the Town Centre to the Goodwill junction, with private housing and small front gardens both sides of the road has little scope for improvement.	Strategic options	Strategic development options 3 & 4 were selected and developed further in the Preferred Option consultation document. The additional comments are noted. No change

## Chapter 2

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Chapter 2	Not enough analysis of the Town Centre problems of traffic,	More	The chapter is indented to provide a general portrait of

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		parking, poor quality low rise buildings, poor quality shopping, permeability etc.	analysis needed and	the key characteristics and issues of the Intensification Area. Therefore <b>no change</b>
9	Chapter 2	More radical solutions need to be explored and previous studies reconsidered (Alsop's Station Plan).	Radical solutions should be explored	The AAP must be a realistic and deliverable plan to pass the tests of soundness. More radical solutions, prepared in more favourable economic conditions, are unlikely to be viable in the plan period. Therefore <b>no change</b> .
9	Harrow town centre (page 13)	Requires more description and analysis.	Description and analysis.	This section intended as a brief portrait of Harrow town centre issues (as with the other character areas) rather than a detailed analysis. Therefore <b>no change</b> .
31	2.1	<p>Under 'Notable Institutions and Major Employers', Northwick Park Hospital and The Harrow Campus of Middx. University have been omitted, which although on the edge of the Action Area have a huge influence with regard to employee access to and from those institutions.</p> <p>The relationship between Northwick park Hospital, Middx. Uni. and Harrow Centre for pedestrians and public transport is abysmal and urgently needs to be addressed.</p>	Reference Northwick Park Hospital and Middlesex University Improve linkages between the hospital/uni and harrow	<b>Noted, text amended</b> to include reference to Northwick Park Hospital and Middlesex University (Harrow campus) within the London Borough of Brent.
19	2.1-2.5	<p><b>Harrow's rail connections</b></p> <p>Paras 2.1, 2.4.4 &amp; 2.5.1 overstate Harrow's rail links. Accept Harrow has good access to Euston, Marylebone and by Underground (with direct services beyond the centre to Elephant and Stratford). "Other parts of the southeast" that have direct access from Harrow are Clapham Junction (with a stopping service that then calls all stations to Croydon), Tring, Aylesbury and Milton Keynes - and with the decline of Virgin services serving Watford the connectivity there to the Midlands and northwest is poor. Harrow's rail connections to Heathrow and boroughs to the south and west are limited and to boroughs to the east do not exist.</p>	Revise the statement on Harrow's Rail connections	<b>Noted, text amended</b> to include more specific references to rail destinations served by Harrow on the Hill and Harrow and Wealdstone stations.
19	2.2	<p><b>Diversity</b></p> <p>Para 2.2 states that Harrow's population is diverse. Agree with this, but happily this diverse population is pretty well integrated and we can expect it to continue to do so - do not need consider</p>	Remove Diversity as a	Noted. The purpose of this paragraph is to present the current picture and the degree of further change expected over the plan period.

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		diversity needs to be identified as a policy objective.	policy objective	Therefore <b>no change</b> .
53	2.2.2	I now skip to your plan. Chapter 2.2.2 states that immigrants will increase by 6% by the end of the plan. More water. More energy. More refuse. Your man at "the drop in" stated that the refuse recycling rate will be increased dramatically from its near 50% rate now. I fear these new Harrow residents will disappoint you over this figure by what I have seen in Harrow.	Water/energy and refuse infrastructure capacity	Noted. Policies in the London Plan and DPDs seeks to ensure that population growth can be accommodated in the most sustainable way possible (e.g. by using water and energy efficiently, supplying green energy, etc). Therefore <b>no change</b> .
19	2.4	<b>Access at Harrow on the Hill</b> Paras 2.4.5, 2.4.6, 2.4.8 & 3.6.7 Agree the station is dispiriting - needs disabled access and access at first floor level to St. Ann's. St. Ann's being closed in the evenings does nothing for access from the station to the town centre. Agree there is a need for some activity in the town centre during the evenings - but not just youth culture.	Improved access to and nighttime activity in Harrow town centre	Agreement noted. Therefore <b>no change</b> .
9	Para 2.4.10	The building heights along Station Road are not 4 – 5 storeys. They are predominantly less.	Amend text	<b>Noted, text amended</b> to refer to generally 3-4 storeys (to south).
9	Para 2.4.11	It is not good continuity, it is poor quality continuity. More descriptive analysis is required.	More analysis needed	<b>Noted, text amended</b> to refer to the mix of built form in Station Road and the resulting overall incoherent character.
53	2.4.16	Chapter 2.4.16 states "Small features such as the street furniture styles and the hanging baskets on the street lights suggest the local, sometimes charming quality of the place". Is this before one smells the Kebab shops and are barged out the way by hordes of loud school children pushing their way past you on to buses. A charming feature!	None	Noted. <b>No change</b> .
9	Wealdstone (page 15)	More descriptive analysis is required.	More analysis needed	This section intended as a brief portrait of Wealdstone issues (as with the other character areas) rather than a detailed analysis. Therefore <b>no change</b> .
9	Transport (page 16)	This is too simplistic. Bus routes, car routes, parking areas, congestion points etc should all be described and analysed.	More analysis needed	These have been the subject of detailed modelling undertaken by TfL and it is not appropriate to include this level of detail in the AAP. Therefore <b>no change</b> .
25	2.5.1	Para 2.5.1 states that there are "good to excellent public transport accessibility levels (PTAL) across the intensification area." PTALs measure only the frequency and capacity of public transport services, not physical accessibility. Any reference to Harrow on the Hill station having "excellent accessibility" is therefore	Harrow on the Hill station should not be described as	PTALs is a widely recognised planning term and does not imply that physical access is inclusive. The accessibility shortcomings of Harrow on the Hill Station are already documented in Harrow's Core Strategy (2012) and Policy CS2(M) makes provision for developer

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		misleading, due to its lack of step-free access to ticket hall and platforms. This is acknowledged elsewhere in the document, but PTALs are widely used by developers to justify buildings such as Neptune Point, which will contribute almost nothing in financial terms towards making Harrow on the Hill station fully accessible, (despite TfL being the owner of the development site!).	Accessible.	contributions through the Community Infrastructure Levy in the event of specific proposals for improvements to the station. <b>Text amended</b> to acknowledge the continuing lack of inclusive access at Harrow on the Hill station.
25	2.5.2	Para 2.5.2 refers to "spare rail and tube capacity" This is true off peak, and of the Bakerloo and Overground as far as Queens Park at most times of day, but not the central London sections of all lines, over which many commuters from Harrow have to travel. On the Metropolitan, Chiltern and London Midland Lines, trains into Central London are extremely crowded in the morning peak and vice versa in the evening. The forthcoming Croxley rail link will also have an effect on train usage, especially at peak times. The capacities referred to are theoretical and do not take account of cancellations, delays or the fact that standing on over-crowded trains is the only option for most passengers at peak times, increasingly so with the new Metropolitan Line trains with fewer seats than the old ones. We shall comment further on this at the next consultation round, by which time the TfL study findings may be available.	Rail and Tube capacity findings do not reflect reality	Noted. The issues of 'crush load capacity planning' and of peak time congestion 'down the line' were discussed at the Core Strategy examination in public, where it was accepted that these are matters for TfL as the strategic transport planning authority for London. Harrow's Transport Study deals with the capacity of services within the Borough only and is consistent with the principle of a proportionate evidence base. Therefore <b>no change</b> .
25	2.5.3	Para 2.5.3 quotes spare capacity on some bus routes but fails to mention that the network has serious weaknesses, for example the lack of any direct services to places such as Ealing and Park Royal, severe overcrowding of the single route serving the Harrow-Wembley corridor, and extreme slowness of routes to places such as Heathrow and Edgware. Bus priority measures are mentioned at various points in the AAP but they are disappointingly timid in relation to the urgent need to maintain a reliable public transport system in Harrow - e.g para 2.5.10 refers to "some bus priority improvements" and 3.6.5 to the intention to "explore opportunities to improve bus access". Harrow View (2.5.12) also needs improvements in bus priority, though it is difficult to see how this could be achieved, except by extending the dual carriageway between the Kodak factory and Headstone Gardens junction.	Omission of weaknesses of transport network and buses	The Core Strategy recognises the need for improved orbital bus links and undertakes to work with TfL to deliver this. This is a matter for the Borough as a whole, not just the Intensification Area. Therefore <b>no change</b> .  <b>Text to paragraphs 2.5.10 and 2.5.12 amended</b> to refer to improvements to the operating conditions of buses.
19	2.5.3	<b>Harrow bus station</b> Para 2.5.3 agree Harrow bus station is inadequate for the current use it has. Do not see how it can cope with an "enhanced " service	Lack of capacity at Harrow bus	Noted. There are proposals for increased bus standing capacity on Kymberley Road pending a more comprehensive redevelopment of the bus station.

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		with extra trips.	station	Therefore <b>no change</b> .
19	2.5.4	<p><b>Car ownership and car use</b></p> <p>Paras 2.5.4 &amp; 2.5.5 refer to the need to encourage walking/cycling/public transport use, but recognise there is high car ownership. 3.4 describes the challenge to change travel habits and to generate more journeys by public transport, foot and bike. It is not clear whether the aim is to restrict car ownership or car use. Need to recognise that a car owner who uses public transport for his journey to work has a <b>greater</b> need for adequate secure parking at his home. Hitchin Way and its effect on Whichurch Lane and the Canons Park parade show the dangers of restricting car parking space at new developments - agree the aim of making it possible to make journeys without using the car, but many journeys cannot realistically be made by public transport (see clause 2 above), so do not consider making it impossible to own a car is a realistic policy (see also para 5.8.8).</p>	Car parking – need to provide spaces in residential developments.	Part of the <i>raison detra</i> for the Intensification Area was the accommodation of development in an area well served by public transport, where parking restraint in new development can help to deliver a range of sustainability benefits. Parking for individual proposals will be assessed in this context and against the policies of the Development Management Policies DPD and the London Plan. The Core Strategy includes a commitment to prepare a Green Travel Plan for the whole of the Intensification Area. Therefore <b>no change</b> .
25	2.5.8	Reference is made at para 2.5.8 to the Core Strategy Transport Audit (2010) and there is an acknowledgement that a number of local improvements could be made to ease traffic flow which might be funded by new development. Commenting on the draft Transport Local Implementation Plan over a year ago, we indicated a number of improvements that could be made at nil or very modest cost. Is there any reason why these could not be implemented, at least on a trial basis, immediately?	Bring forward some transport improvements	Noted. Immediate implementation of proposals a matter for the Local Implementation Plan; the AAP seeks to plan for the longer term improvements needed to sustainably support growth over the plan period. Therefore <b>no change</b> .
25	2.5.9	<p>Para 2.5.9 refers to refinement of TfL's sub regional transport modelling report which is due this spring, including impact of increased congestion on junction capacities. We would suggest early implementation of conclusions from this work</p> <p>Even if most of the proposed population increase in the Intensification Area eschews the motor car, their presence will still have an impact on vehicle traffic. This will flow more slowly if there are more pedestrians, partly due to greater frequency of pedestrian signal phases being activated, and partly because of greater occupancy time when the signals are on pedestrian phase and traffic is stopped. Reduction in the number of pelican crossings (on safety grounds) has further slowed traffic flows. This presents a particular challenge in Station Road, where the already heavy pedestrian flows are likely to be increased by the</p>	<p>Implement recommendations from transport modelling report as soon as possible</p> <p>More radical re-design of station road is necessary</p>	<p>The results of TfL's additional modelling work and the consideration to mitigation measures form part of the evidence base underpinning the AAP.</p> <p>The AAP must be a realistic and deliverable plan to pass the tests of soundness. Comprehensive redevelopment of Station Road to achieve a carriageway width</p>

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		<p>opening of the Mosque, Civic Centre site development and Tesco's expansion plans. Adjustments to signal timings, kerb alignments and minor changes to junctions (as envisaged at para 2.5.10, for example) will not satisfy the needs of all those (pedestrians, cyclists, motorists, delivery vehicles, buses and emergency vehicles), competing for very limited carriageway width. A more radical redevelopment of Station Road as a boulevard with pedestrians/cyclists/buses segregated from each other and from general traffic seems the only way forward unless certain categories of traffic are provided with alternative routes. However only cycling (via back roads) seems amenable to diversion away from Station Road.</p>	<p>to cope with the additional traffic and pedestrian demand-suggest boulevard with segregated cycle/bus lanes</p>	<p>necessary for the degree of segregation suggested is unlikely to be a viable proposition in the plan period. Therefore <b>no change</b>.</p>
25	2.5.11	<p>Para 2.5.11 acknowledges that significant cycling improvements could be made across the Intensification Area. If cycling is to be encouraged further, there is a need for proper, segregated cycle lanes. At present many cycle lanes are simply too dangerous to use because they are a part of the road which is dotted with parked cars. We suggest that consideration should be given to identifying quieter roads as alternative routes for cyclists, where verges could be converted to dedicated cycle lanes so that cycling is a more tranquil and safe experience. If appropriate markings are used, some underused footpath space might be suitable for shared use by pedestrians and cyclists.</p> <p>The document refers at para 2.5.7 to some spare car parking capacity in Harrow Town Centre on. At para 6.8.5, which deals with the redevelopment of Gayton Road, there is a suggestion that the car park there could be relocated elsewhere within the town centre. It does not say where, nor does it justify the use of costly town centre land for parking when the general emphasis is to encourage walking and cycling.</p>	<p>Need segregated cycle lanes</p> <p>Concern over proposals to relocate parking at Gayton Rd</p>	<p><b>Text amended</b> to recognise that some segregated cycle lanes may be appropriate at busier junctions.</p> <p>The text does not seek to 'relocate' provision from Gayton Road car park, but rather to make use of spare capacity at other town centre car parks. Therefore <b>no change</b>.</p>
9	Para 2.5.7	<p>Parking is in the wrong place. Why bring cars to the centre. Parking should be on the outskirts to collect cars from the suburban zones. Park and ride or better bus routes should then take visitors within the Intensification Area. This will separate pedestrians from vehicles.</p> <p>Through traffic should also be analysed, identified and solutions reached.</p>	<p>Park and Ride facilities should be introduced from the edge of the Intensification area</p>	<p>Park and ride facilities can be useful in some situations but risk undermining the objective of a more comprehensive modal shift from car use to public transport (or other sustainable modes). Therefore <b>no change</b>.</p>
9	Para 2.5.8	<p>This should be described in more detail.</p>	<p>More detail</p>	<p>Details included in the additional transport modelling</p>

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				work, forming part of the evidence base for the AAP. It would be inappropriate to set out details of specific improvements here. Therefore <b>no change</b> .
51	2.5.9	<p>With the level of development anticipated within the Intensification Area, there is clearly going to be a huge pressure on our roads and other infrastructure.</p> <p>2.5.9 refers to the impact assessments being undertaken by the Council and TfL and the need to encourage people to walk and cycle. This is an ideal that would reflect a growing trend in Central London, where many people cycle to work or pick up a “Boris Bike” to get around the core area. However, given the age profile of people in Harrow compared to Central London, the ideal is not entirely achievable. Cycling in an urban area is for young adults as opposed to older people and children and 2.2 states that the age structure in the Intensification Area is unlikely to change. This brings us to the fundamental question of whether the proposed density of development is sustainable?</p>	<p>Cycling may not be an appropriate solution given Harrow’s demographics</p> <p>Is the proposed density of development sustainable</p>	<p>Disagree that increased cycling is not achievable in Harrow. The scale of development to be accommodated within the Intensification Area has already been established in the Core Strategy.</p> <p>Therefore <b>no change</b>.</p>
9	Para 2.5.10	<p>Which part of Station Road? It is very long and goes through Harrow Town Centre.</p>	<p>Which part of Station Road</p>	<p>This paragraph deals with the Station Road sub area (the section of Station Road within Harrow town centre has already benefited from public realm improvements).</p> <p>Therefore <b>no change</b>.</p>
50	2.5.12	<p>Chapter 2 provides a portrait of current situation in respect of the intensification area, including Wealdstone.</p> <p>The draft AAP acknowledges that Transport for London is currently testing the cumulative impact of the development proposed within the Intensification Area. Paragraph 2.5.9 of states that <i>“the preliminary results show that a number of junctions in the area will experience a higher level of congestion as a result of the proposed intensification, reinforcing the need for localised mitigation, including modal shift towards walking and cycling.”</i></p> <p>Land Securities have engaged with TfL and Harrow Council in respect of the strategic modelling and we understand that it is to be published in due course. We wish to continue our engagement with TfL in the production of the strategic modelling for the wider area.</p> <p>In terms of transport and movement, paragraph 2.5.12 of the draft AAP states that <i>“depending on the mix of uses proposed, the redevelopment of the Kodak site is likely to have a</i></p>	<p>TfL modelling</p> <p>Remove reference to Kodak site having a disproportionately higher impact on the local transport network than other sites within the Intensification Area.</p>	<p>TfL have now completed the more detailed modelling work and this paragraph has been updated to provide a brief summary of the findings.</p>



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		<p><i>disproportionately higher impact on the local transport network than other sites within the Intensification Area where there is greater capacity.</i> We do not consider that it is appropriate to make this assumption at this stage particularly given the existing use of the site and the negotiations which are currently being undertaken with TfL and Harrow. There also appears to be no evidence to support this statement, particularly given that TfL have not completed their strategic modelling.</p> <p>We would request that this reference is removed from the AAP and reference is purely made to the requirements for improved access and walking and cycling links which Land Securities duly note and have sought to incorporate into the proposed scheme.</p>	<p>Replace with requirements for improved access and walking and cycling links</p>	
9	Para 2.5.13	Trams?	Trams	<p>There are no plans for a tram network, which would constitute a significant component of infrastructure that would duplicate the function of existing bus capacity. Therefore <b>no change</b>.</p>
40	Chapter 2	<p>While we welcome the emphasis on sustainable forms of transport, especially walking, within the area, we feel that insufficient attention has been paid to present deficiencies in links to other parts of the Borough. In particular, there is a need to ensure that residents of areas of Harrow with high rates of unemployment can access new employment opportunities in the Intensification Area. Large social housing estates, such as those at Harrow Weald and Pinner Hill, need special attention. The former is geographically quite close to the Kodak site but lacks a safe and pleasant walking or cycling route. The latter has no convenient public transport links to anywhere in Wealdstone, including the Kodak site.</p> <p>Indeed, the present lack of good east-west public transport links through Wealdstone is something that needs emphasis. The main railway line is not just a barrier for pedestrians and cyclists. It is also impenetrable by double-deck buses. New bus infrastructure and routes should, we believe, be added to the travel planning measures listed in 2.5.13.</p>	<p>Ensure links from outside the Intensification Area tow within it are improved</p> <p>New bus routes and infrastructure including improved east west links from Kodak should be included</p>	<p>The Intensification Area benefits from high public transport accessibility levels which, in part, reflect the high level of bus connectivity between this part of the Borough and other districts of Harrow. The Local Implementation Plan is the appropriate document for improvements including any new bus routes that may be required throughout the Borough. The role of the AAP is to focus on movement within the Intensification Area. Significant improvements to the railway (eg new vehicle bridges or tunnel deepening/widening) would constitute substantial and unnecessary components of new infrastructure within the plan period. Therefore <b>no change</b>.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
19	Chapter 2	<p><b>Station Road</b>            Para 2.4.13 states "Station Road is the key public and private link" with "heavy usage", "congested" and "uncomfortable environment". 2.5.8 offers improvements at junctions, changes to parking, wider footpaths and cycleways, but do not address how Station Road can cope with the increases in traffic which the development will create - do not see how the Core Strategy Transport Audit could conclude that the existing road could cope with the additional traffic from the new development (the development at Stanmore Park had a very detrimental effect on traffic in Stanmore). Para 2.5.10 confirms the problem and its aim to have "less traffic-intensive uses" at "major opportunity sites" in Station Road is fanciful.</p>	Traffic congestion	<p>The aim of the AAP (reflected in this paragraph) is to improve the environment of Station Road and the performance of some junctions (which were highlighted in the Transport Audit as having localised, peak time congestion issues) rather than to substantially increase the capacity of the road – which would be likely to simply draw in traffic for congested parts of the network elsewhere.            Therefore <b>no change</b>.</p> <p>'Less traffic intensive uses' does not necessarily mean less trips, but less trips by unsustainable modes leading to a modest reduction in car congestion. <b>Text amended</b> to clarify this point.</p>
19	Fig 2.8	<p>Fig 2.8 on p 18 - refers to joint use by cyclists and pedestrians. Potentially dangerous! Belmont Circle (outside the Action Area) is an example - shoppers inevitably drift about and stray into cycle paths - a shared area should never be in a shopping centre. This sort of joint use should be avoided! Joint use in parks would be safe if cycles had bells and the cyclists used them - why was this sensible practice discontinued?</p>	Joint use of paths for bikes and pedestrians should be avoided	<p>With appropriate segregation of pedestrian and cycle paths, cycle provision adjacent to busy roads is preferable to cyclists using a heavily congested vehicular carriageway.            Therefore <b>no change</b>.</p>
30	Chapter 2	<p>The projected increase of 4,160 new residents in the Intensification Area within the plan period will severely strain the transport infrastructure.            There will need to be a new Harrow Town Centre bus and train interchange with the added possibility of a (free) tram route to Wealdstone along Station Road.            Currently Harrow-on-the-Hill train station and bus station are poorly accessed, unattractive and unwelcoming gateways for visitors and potential businesses to Harrow.            Harrow and Wealdstone Station is an attractive period building but has poor accessibility.</p>	Improve the stations	<p>The impact of Intensification Area strategic growth upon transport capacity has already been assessed through the Core Strategy. The accessibility shortcomings of Harrow on the Hill Station are already documented in Harrow's Core Strategy (2012) and Policy CS2(M) makes provision for developer contributions through the Community Infrastructure Levy in the event of specific proposals for improvements to the station. Harrow &amp; Wealdstone station is fully accessible.            Therefore <b>no change</b>.</p>
32	Chapter 2	<p>This chapter provides an overview of the intensification area at the current time and College Road is identified within the Harrow Town Centre character area.            We would agree with the assessment for this character area and would comment that its current state reflects a number of lost</p>	Pool CIL receipts to fund improvements to the	<p>The accessibility shortcomings of Harrow on the Hill Station are already documented in Harrow's Core Strategy (2012) and Policy CS2(M) makes provision for developer contributions through the Community Infrastructure Levy <i>in the event of</i> specific proposals for</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>opportunities, a lack of general investment and a historic failing to take a holistic and bold approach in developing the town centre generally. A coordinated and comprehensive approach to the development of and investment in, together with enhancements to the general environment, advocated by the Intensification Area will make a real difference to the town centre.</p> <p>In terms of Transport &amp; Movement, we note the comments made in respect to Harrow-on-the-Hill station and the Harrow bus station and their potential for improvement. We would comment that the solution to this, and indeed many of the other initiatives within this section, are not ones that any individual developer can sustain but ones that should be addressed through an associated Community Infrastructure Levy whereby all appropriately located developments contribute to the wider delivery. Critical to delivering an improved public transport interchange, and the modal split proposed, will be Transport for London and their ability to prioritise improvements at the station. However, it is imperative that development is brought forward in the short term and this should not be stalled by a delay in infrastructure coming forward.</p> <p>It is also important to ensure that expectations are properly managed in respect to the financial burdens that each site will need to bear and how this manifests itself into the viability of an individual proposal and the wider package of benefits, including community, affordable housing etc that a scheme can sustain. Our experience is that the expectations as to what an individual development can deliver by way of infrastructure provision has historically stagnated investment in the town centre generally.</p>	<p>stations</p> <p>Development should be allowed to go ahead in advance of infrastructure improvement</p> <p>Need to ensure contribution demands are not too high to stifle investment</p>	<p>improvements to the station. Other CIL requirements are also listed in the Core Strategy and will be brought forward and consulted upon in a draft charging schedule later in 2012.</p> <p>Therefore <b>no change</b>.</p> <p>The implementation of a Harrow Community Infrastructure Levy, informed by viability, will put the funding of local infrastructure from development onto a more adequate and certain footing.</p> <p>Therefore <b>no change</b>.</p>

### Chapter 3

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
9	Para 3.2.1	I doubt if Harrow's appeal is highly valued by residents. What is its appeal? Harrow has few strengths that can be marketed.	What is Harrow's appeal	The Council disagrees, as does the market, with significant developer interest in many of the strategic opportunity sites allocated. Harrow's strengths include fantastic public transport connections, green leafy suburbs, easy access to a network of open spaces and parks, and excellent schools and other local amenities.

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
29	Key Issues Challenges 3.3	Under section 3.3 Issues, there is reference to Green Space and landscaping which is mentioned only in the last two bullet points, and appears passive. Section 3.4 in respect of challenges refers to securing environmental improvements in advance of, or parallel with growth in the area and this is to be welcomed.	Green space	Unclear how these statements are construed as passive. The order of the bullet points does not convey priority or lack of in respect of the issues identified. Support for the securing environmental improvements is noted
53	3.3	Chapter 3.3 states "Harrow town centre shopping malls are inward looking and make no contribution to the public realm". They certainly are physically and mentally inward looking, which is why all sensible residents go out of the Borough to shop.	Inward looking shopping malls	Comments are noted
9	Para 3.4	The tenth paragraph does not reflect the statement in para 2.5.8, however they are more accurate.	Consistency	<b>Noted and amendments made to paragraph 2.5.8</b>
38	3.4	Bullet points should be added here stating the following: <i>"manage and reduce the impacts of climate change and increased risk of flooding through the layout and form of the development and appropriate application of sustainable drainage techniques.</i>  <i>Remediation of existing contamination and reducing the risk of future contamination through strategic development."</i>	Addition of bullet points as stated	Agreed. Suggested additions have been included
9	Para 3.5	It will not require taller buildings. Higher densities can be achieved with maximum 6 – 10 storeys dependent on the area.	Limit tall buildings	See amendments to Policy AAP6
31	3.5	'Enhancing Harrow's profile';- The feasibility of the installation of a lightweight electric tram system linking Harrow & Wealdstone Station/Wealdstone Centre, Harrow on the Hill Station/ Shopping Centre and possibly the Leisure Centre and maybe the Kodak site should be examined in some detail as a priority as it would help alleviate the presently overstretched bus service and congested Station Road, while greatly improving links between key areas, bringing the whole entity more cohesively together with a low carbon ecologically sound transport system, which would help raise the overall profile of the whole Action Area. A link with Northwick Park Hospital and the Harrow Campus of the Middx. University I believe should also be considered.  There should also be a stronger emphasis on the creation of a new transport hub (for trains, buses and trams?, in close liaison with tfl) accessible at all levels at the entrance to the St. Anne's Shopping Centre/ Harrow on the Hill Train and Bus Station. I	Explore possibility of tram system  Emphasise the creation	In discussion with Transport for London, it was concluded that trams would not be a viable nor feasible option to pursue for the Heart of Harrow.  Both the Core Strategy and the AAP are clear on the intention to provide a modern transport interchange

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		believe this should be at the heart of any new development.	of a transport hub	through redevelopment of the Bus Station and Harrow-on-the-Hill Station
40	3.5	We are also concerned about the coupling of 'taller buildings' with 'higher residential densities' in 3.5 (para 3). It is acknowledged that tall blocks of flats are not a suitable environment for family housing (see, for example, the current Government consultation <a href="#">Allocation of accommodation: guidance for local housing authorities in England</a> ). There are many examples within London which show they are not necessary for the achievement of high density, as long as the car is not allowed to dominate.	Tall buildings and higher densities	See the amendments to Policy AAP6 which address these issues
42	3.5	Section 3.5 says “ Achieving the Core Strategy targets will require taller buildings and higher residential densities to be woven into the existing urban fabric.” If taller buildings are to be “woven into the residential areas” there needs to be a maximum height. Most of the AAP indicates up to 8 storeys. We consider there should not be <b>any</b> buildings taller than nine storeys in <b>any</b> part of Harrow.	Limit tall building heights	See the amendments to Policy AAP6 which clarifies the definition of taller and tall buildings
54	3.5	It is noted that under Opportunities (para 3.5) reference is made to the need for taller buildings and higher densities to be delivered in the AAP in order to achieve Core Strategy development targets. However it should be made clear that these forms of development should always be considered within the context of their potential impact upon the existing local and historic character of Harrow and Wealdstone, and beyond. For example we would seek to ensure that taller buildings and higher density levels do not cause harm to the significance of heritage assets, including their settings. This could be addressed through modification to policy AAP6: Development Heights so that the significance of heritage assets are fully assessed and conserved. In connection with the Harrow Town Centre sub-area, tall buildings may be considered appropriate (para 3.6.7 and 4.4.4). We would suggest that, where tall buildings are proposed, the impact of them should be carefully balanced against their potential impact upon the setting of the Harrow-on-the-Hill conservation area and its range of heritage assets. At present the text (para 3.6.7) suggests opening up sight lines to St Mary’s Church, however no mention is made of the setting of the heritage assets that define Harrow-on-the-Hill nor the need to conserve its significance by avoiding inappropriate development in its setting.	Need to ensure taller buildings don’t adversely impact on heritage  Suggested modification to policy 6 – significance of heritage assets	See the amendments to Policy AAP6 which clarifies the definition of taller and tall buildings Paragraph 3.6.7 is amended to refer to the safeguarding of the setting of the Harrow Hill. conservation area and its range of heritage assets

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
54	3.5	Conserving the area's heritage assets and wider historic environment should be seen as an opportunity rather than just a challenge (para 3.4 and 3.5). PPS5 policy HE3 and London Plan policy 7.9 clearly places the positive and proactive management of the historic environment as a priority and as a potential catalyst for regeneration which can deliver social, economic and environmental benefits.	Add conserving heritage as an opportunity	Agreed in part. The Council considers the conservation of heritage assets to be both an opportunity and challenge. Section 3.5 has therefore been amended to include this as an opportunity as well
9	Fig 3.1 Harrow & Wealdstone Intensification Area sub areas	There is no such place as Wealdstone West. It is Harrow View. It is and will always be completely separated from Wealdstone by the railway.	Change name of Wealdstone West to harrow View	The sub areas are based on an urban character analysis. The Wealdstone West sub area is defined its large industrial sites and therefore extends east of the railway to also include the Colart site
47	3.6	P.23 Section 3.6 P.23 et seq. Area-Based Issues, etc. A number of "other considerations" in this section are prefaced " <b>Explore ...</b> ". Instead, a more affirmative statement should be adopted – " <b>Improve ....</b> "	Replace word as stated	In the majority of instances where 'explore' is the preface it is in the context of 'explore opportunities to improve', highlighting the fact that there are either barriers, or alternatives and options available that need to be considered in respect of such improvement. The context is therefore correct.
9	Para 3.6.2	– It cannot physically be well connected to Wealdstone Centre. Improving the image of Wealdstone from the railway is a nonsense. The speed of trains here is very high.	Physical connection	The Council considers that opportunities exist, and that should be pursued through the AAP, to enhance connections between development of the Kodak site and Wealdstone town centre – despite the physical barrier the railway line presents
19	3.6.2	<b>Access from Kodak site to Wealdstone</b> Para 3.6.2 describes improvements to access from the Kodak site into Wealdstone - the new pedestrian/cycle link across the railway shown in fig 1.2 is essential - it will hamper the commercial life of Wealdstone if this is not built (and will undermine the stated aim of reducing car use). It is a concern that Land Securities appear not to show or favour this part of the development in their plans. Improvements to the railway bridge described in 3.6.3 - assume these are to make it more pedestrian friendly and secure - increasing the height available for traffic must be uneconomic. Prone to flood - how much is this due to failing to keep drains clear/inadequate maintenance/cost-cutting?	New access over railway from Kodak, and improve existing links	The AAP retains the proposal for bridge/underpass providing a new pedestrian and cycle connection across the railway line to connect the Kodak site with the proposal for a new secondary school on the Teachers Centre site. While evidence show that delivery of this enhanced connection is not currently viable as part of the Kodak development, the Council considers the potential for possible delivery should be retained should this prove viable at some time in the future. The improvements to the bridge are in respect of enhancing the environment for pedestrian use. Localised flood under the bridge is due to the change in levels.
50	3.6.2	Paragraph 3.6.2 of the AAP outlines the key issues, challenges and opportunities for Wealdstone West. Land Securities support	Key issues for	Support is noted.

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		<p>the acknowledgment by the Council of the opportunity for major redevelopment on the Kodak site and the requirement for good integration to deliver the regeneration benefits for Wealdstone. We note that the Council have highlighted that a key consideration is the opportunity for new views/vistas from the Kodak site. We assume that this reference is related to Chapter 6 which sets out the site specific guidance for Site 02 and seeks the creation of a new vista to Headstone Manor from Harrow View.</p>	Wealdstone West	Reference does refer to Chapter 6 and the creation of views to Headstone Manor
54	3.6.2	<p>English Heritage has recently commented upon current Outline Planning Application for the redevelopment of the Kodak Site. In our response we raised concerns regarding the impact of the proposed development upon the setting of Headstone Manor (listed grade I) and its site as a Scheduled Monument within a complex of grade II* and grade II listed buildings. This collection of heritage assets is a key element of Harrow's historic environment and we would seek to ensure that the policy framework for the conservation of this site and its setting is sufficiently robust, so that the significance of the assets is not harmed through inappropriate development. With these points in mind we would suggest that the one of the key considerations for the Wealdstone West sub area (para 3.6.2) is to ensure that Headstone Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage assets. This is achieved through thorough analysis of all the heritage assets, their significance and the contribution the setting makes to their significance. This includes assessing the assets individually and collectively. This approach is line with Planning Policy Statement 5: Planning for the Historic Environment (PPS5) (2010) and English Heritage's <i>The Setting of Heritage Assets</i> guidance (2011).</p>	Add key consideration of ensuring headstone Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage assets	<p>Agreed. Suggested further key consideration for the Wealdstone West sub area has been included.</p> <p>It should be note that the Council has concluded, in its response to the current Kodak planning application, that the development on the Zoom Leisure sites represents an encroachment however the retention of a portion of the existing open space will provide a buffer to Headstone Manor, coupled with building heights of two to three storeys in scale, will ensure an acceptable relationship is maintained. Careful scrutiny of building materials and landscaping of the open space are required through reserve matters.</p>
9	Para 3.6.3	<p>If the area is under performing it should be regenerated properly in its own right not just a link between Kodak and the leisure centre. Its low key nature is its problem. It is not a strong compliment to Harrow Metropolitan character. It is dying, worn out and shabby. The low key nature should not be safeguarded. It should have as great a presence as Harrow Town Centre, but in a different way,</p>	Regeneration of Wealdstone	The wholesale regeneration of Wealdstone is currently undeliverable. Through delivery of the AAP objectives and key opportunity sites over the next fifteen year, these will provide the opportunity and demand to significantly redevelop Wealdstone town centre
38	3.6.3	<p>We suggest the wording of the 10 bullet point is altered to include:  <i>"...taking into account of the fact that a significant portion of Wealdstone town centre falls within Flood Zone 3 and</i></p>	Reword bullet point 10	Agreed, the suggested amendment has been made

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		<i>development should be set back a minimum of 8 metres from the outer edges of the culverted Wealdstone Brook.”</i>		
53	3.6.3	Chapter 3.6.3 states “add diversity to the existing small scale and specialist retail offer”. Yes please....”Enhance the role of the town square”. Where is the town square??	Retail	Support for the objective for the sub area is noted. The town square is located between the High Street and Headstone Drive
19	3.6.4	Welcome action on Belmont trail in 3.6.4 (but question how realistic it is for the railway bridge, Masons Ave, Peel Rd., Palmerston Rd., Elmgrove Rd. and Hindes Rd. to be part of the Green Grid).	Green grid	While these proposals may not take the traditional form of green corridors, the greening of street environments within the Heart of Harrow are crucial to delivery of the green grid and the establishment of a true network.
40	3.6.4	The reference to 'contemporary reinterpretations of suburban housing types' in 3.6.2 signals to us low density and car dependence and we are not sure what is meant by 'a metroland / Victorian suburban form' (3.6.4). We hope for improvements in the text here.	Clarification	Agreed. Means that new development should have regard to the existing character and context but instead of replicating this, it should be reinterpreted through modern design and contemporary buildings. An addition to this effect has been added to this bullet point
9	Para 3.6.5	Trams? Improve the image of existing buildings and “strongly promote” not “consider” redevelopment where possible. Wider streets, planting, boulevards etc. should be provided through a Town Centre Design Guide.	Textual changes  Need a Town Centre Design Guide	In discussion with Transport for London, it was concluded that trams would not be a viable nor feasible option to pursue for the Heart of Harrow. The suggested amendment to para 3.6.5 re ‘strongly promote’ is agreed and made The AAP takes the place of the proposed Town Centre Design Guide, and as a development plan document has significantly more weight in controlling new development and delivering change, such as that desired for Station Road
9	Para 3.6.7	The recent public realm improvements and new bus routes have not started to create a dramatic uplift. I am not convinced that there needs to be strong connections to Lowlands Recreation Ground. For what purpose?	Need for link to Lowlands Rec	Comments re recent improvement and no dramatic uplift are noted The improvement to Lowlands Recreation Ground are to serve the town centre, being the only green space within the town centre boundary, and to make provision for outdoor events.
9	3.6.7	It needs to be reaffirmed as a Metropolitan Centre but this does not mean tall buildings. Proper Town Centre Design Guidance is required. This should not be superficial it needs to be more than that.	Need a Town Centre Design Guide	This is clarified in the amendments made to Policy AAP6 The AAP takes the place of the proposed Town Centre Design Guide, and as a development plan document has significantly more weight in controlling new development and delivering change
19	3.6.7	Para 3.6.7 "Co-ordinated material palette" is Council-speak and is unintelligible.	Clarity of text	Agree. Text has been amended to now read - Ensure new developments within the town centre use similar



ID	Section / Para	Summary of Comments	Topic /Change	Council Response
19	3.6.7	<p>Para 3.6.7 also states the need to improve the visual relationship between the town centre and Harrow Hill (which is also stated elsewhere in the consultation). Yet (5th para from the end) it makes sympathetic comments about tall buildings. These statements are incompatible - other locations in West London (like Uxbridge and Heathrow) do not have the same contrast between tall buildings and historic/natural features that Harrow does, and they can accommodate tall buildings. This is not the case in Harrow!</p>	Concern over tall buildings	<p>materials, providing a more coherent character.</p> <p>See amendments to Policy AAP6</p>
32	3.6.7	<p>We fully support the Council's assessment of its own profile and we fully support the objective that the Borough must raise its profile and embrace change. The Borough missed out on the growth and benefits of the 1990's which adjoining boroughs all benefited from. However, Harrow is well poised now to exploit the potential investment benefits coming forward. We believe that this is crucial if the Borough is to retain its existing Metropolitan status and to establish a secure and buoyant housing and employment market, with modern and appropriate community facilities, high quality public realm and an active town centre which meets modern retail and leisure requirements, which caters for all sectors of the community, and which contributes to the wider economy. It is considered that the poor design of buildings, which has a subsequent impact on the image of both Harrow and Wealdstone town centres and the Station Road area and subsequent investment, needs to be appropriately reflected as an issue under Section 3.3.</p> <p>Paragraph 3.67 relating specifically to Harrow Town Centre does not make reference to residential uses which it is acknowledged elsewhere in the draft APP. Residential uses will ensure round the clock use of the town centre, adding to its vitality and supporting the night time economy the APP seeks to achieve and which is wholly appropriate given the town's Metropolitan status. Similarly under paragraph 3.67, the bullet point '<i>explore building forms that are appropriate to its Metropolitan status, which may include tall buildings</i>' needs to be revised. During the Core Strategy EIP the Inspector was very forthright that the principle of a tall building at 51 College Road had been established and that this had to be reflected within the document. The Core Strategy was</p>	<p>Raising Harrow's profile</p> <p>Poor design of existing buildings to be reflected in paragraph</p> <p>Need to acknowledge residential uses</p> <p>Acknowledge</p>	<p>Support is noted to raising Harrow's profile and objective of retaining the existing Metropolitan status of Harrow town centre</p> <p>Agree that section 3.3 needs to identify the poor quality of recently built development as an issue – amendments have therefore been made</p> <p>Agree that a reference to the benefits that new residential development will bring to the town centre</p> <p>The reference to 'exploring building forms that are appropriate to its Metropolitan status' has been deleted.</p> <p>The amendments to Policy AAP6 make it clear that the role and function of tall buildings is not required to acknowledge the town centre's Metropolitan status but as landmarks providing orientation to locations of significant public interest.</p>

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		subsequently revised to reflect this position. It is therefore not appropriate or consistent with the Core Strategy to state that, in the context of 51 College Road, that there is a requirement to revisit this exercise given that this has already been undertaken and concluded and that, at least in respect to this site the principle of a tall building has been established. Furthermore, the future design of buildings must balance aspirations with economic reality and viability to ensure deliverability.	the principle of a tall building on 51 College Road	
51	Key Issues Challenges 3.6.7	<p>In 3.6.7 , a “new retail complex” is envisaged, with “major new floor space”. I would suggest that new retail development could not be justified in Harrow as it could never compete with regional centres in Shepherds Bush (Westfield), Brent Cross and Watford. National and international retailers are reducing the number of property outlets, rather than increasing as the growing and irreversible trend to internet shopping is changing the face of our high streets. A bigger challenge facing Harrow is how to deal with the inevitable number of high street vacancies. Market forces will determine that rents will fall and retailing in the town centre may become more affordable for local entrepreneurs. The Council’s challenge should be how to make the shopping and leisure experience in Harrow unique and enticing. The Mary Portas Review was probably not published when you were drafting the consultation, but I am sure you are aware of it now and would suggest that you consider its recommendations</p> <p>In 5.7.9 it states that the Council will limit the proportion of non retail activity to 15% of primary frontage. How about a whole area dedicated to bars and cafes?</p>	<p>Lack of retail demand for large premises</p> <p>Consider recommendations from Mary Portas review, think of more local – unique offer.</p> <p>Dedicate an area to leisure uses</p>	<p>Agreed. It was hoped that Debenhams would consider significant redevelopment of their existing store and site to provide for a new major retail complex but discussion with the owner of the building have not resulted in such commitments, so this has been amended. New retail will however come forward as a requirement of the town centre policy that new development provide active ground frontage.</p> <p>The Mary Portas review was considered and is referenced at Chapter 8. Amendments have also been made to the policies dealing with retail and shopping frontages. Although the % thresholds for the primary and secondary frontages remain, the policy is more flexibly and enables the consideration of uses that benefit the town centre and also temporary uses to address periods of high vacancies.</p>
13	Section 3	<p>There is a major omission in the Key issues, challenges and opportunities [section 3] – that of sustainability, particularly in the context of global warming. Harrow has a Climate Change Strategy and a Sustainable Community Strategy, but they are not listed among the issues to be taken into account [3.3]. They should be. They should have the roles of over-riding borough-wide strategic considerations which guide and direct this AAP, and this should be stated clearly in 3.3. This should then lead to adding extra challenges to the list in 3.4 along the lines of:</p> <ul style="list-style-type: none"> <li>- contributing substantially to reducing Harrow’s greenhouse gas emissions and carbon footprint</li> </ul>	major omission in the Key issues, challenges and opportunities of sustainability	<p>Agreed. Section 3.3 has been amended to include the issue of climate change, in particular issues of flooding, drought, island heat effect, and energy costs and reliability. Section 3.4 has been amended to refer to the need to address the impacts of climate change through sustainable design including, greening the built and urban environment, reducing carbon emissions and water use, increasing the energy efficiency of buildings and the use of renewable energy sources.</p>

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		- creating living and working environments that help and encourage residents to lead low-carbon and energy-efficient lives		
40	Chapter 3	We are generally in agreement with the analysis here. We note, however, that, both here and in chapter 2, there are references to the undesirability of guard rails, but no systematic approach to how they can be removed without jeopardising pedestrian safety or the perception of safety. In our opinion, the most important step in enabling and encouraging walking as a mode of transport would be the introduction of a 20 m.p.h. limit throughout the Intensification Area. This, we believe, would enable all guard rails that obstruct pedestrian desire lines to be safely removed.	Introduce a 20mph speed limit	The decluttering of Station Road is to form a package of transport measures to be implemented, including the transformation of the road into a green boulevard that readdresses the existing traffic dominance of the environment

## Chapter 4

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Para 4.1.6	"New exemplary buildings" is a subjective comment and means nothing.	Clarity	Agree. This has been amended to refer to a modern and contemporary take on the Metro-land character that prevails across most of the rest of the Borough.
9	Fig 4.1 Artist's impression of a 21 <sup>st</sup> Century reinterpretation of the classic Metro-land poster	What is the relevance of this? Why are there two yellow lumps intruding into the skyline completely contrary to the Views Assessment? Do not let Dandara influence the proper analysis. This drawing just demonstrates how intrusive tall bulky buildings will be.	Amend drawing	This drawing has been omitted from the final document
19	Fig on Pg 29	p29 - the text "office with views of the green belt" overlooks the objection that the office would be visible from the green belt. The fig shows office blocks intruding on the skyline - which we would rather avoid.  Metro-Land was a rather ambiguous concept - hyped as being countryside but ended up with a vast movement of population to suburban life - which was pleasant and greenish (and still is) - but	Amend drawing  Concept of	This drawing has been omitted from the final document  The concept of Metro-land within the AAP is to promote a modern and contemporary take on the Metro-land character that prevails across most of the rest of the Borough (i.e. retaining the best elements and ensuring these are designed into new development schemes).

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		was not the rural idyll being hyped. Do we really want to repeat this piece of misrepresentation?	Metroland	
30	Section 4	The poster for 'Harrow-The Heart Of Metroland' with the Dandara-like buildings breaking the Harrow Weald Ridge skyline was considered to be divisive at the last group forum held at the Civic Centre. Whilst the colour of the blocks has changed from red to an almost obscure lime there is still the perception that Harrow Council supports tall buildings that destroy the sky-line of the Weald Ridge and Harrow Hill. Public consultation has proved that there is little support for tall buildings in such prominent and intrusive locations.	Amend drawing	This drawing has been omitted from the final document
13	Vision 4.2.1	Ref 4.2.1 core strategy – vision for the Intensification Area [IA] Good to see that high standards of sustainability are expected from new developments. Highlight this as a requirement for developers, encourage them to be imaginative for this.	Highlight Sustainability	Support is noted
53	4.2.1	Chapter 4.2.1.. 2,800 new homes. Energy. Water. Refuse???	Utilities provision	Each dealt with through specific policies in Chapter 5
13	Vision 4.2.2	4.2.2 AAP Vision new homes: add low carbon / energy-efficient	add low carbon / energy-efficient	Amended to include 'sustainable high quality new homes' as 'sustainable development covers both matters raised plus significant others (renewable energy, water management, use of durable materials etc)
13	Objectives 4.3.1	4.3.1 Objectives item 1 add "..., and visibly assists sustainable and energy-efficient living" [after "...a strong sense of community"]	Add criteria	These objectives come from the adopted Core Strategy, and for consistency reasons, and the fact they have been through previous consultation and an examination in public, should not be subject to amendment.
9	Para 4.3.5	How will the improvements increase the Borough's "visibility". Incorrect word, it should not be taken as physical visibility.	Clarity of text	As above
19	4.3.5	<b>Emphasis on west London sub-region</b> Para 4.3.1 5 refers to Harrow's role in the west London sub-region. Harrow also borders Barnet, which is outside this region and does not appear to get considered - e.g public transport links in that direction are poor. Consider Harrow's exclusive focus on boroughs to the west is not in its best interests.	Consider sub region to East	As above
13	4.3.10	item 10 I don't see why all the key borough facilities need to be located in the town centre; isn't it sufficient that they should be in the IA? This should give more flexibility over premises, costs etc. The IA generally has good connections to the rest of the borough.	Key facilities should be located anywhere in IA	As above.
36	Objectives	Hopefully the regeneration of central Harrow will benefit all		As above. Under the plan-led approach, the policies of

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		residents of the borough but the high density development proposed to finance this will have a disproportionately adverse impact on those who already live in or near the intensification area. Apart from a few comments about treating transition areas sensitively, there is no acknowledgement within the AAP of this issue and no policy explaining how it will be dealt with. At the very least, it should be included as one of the objectives in chapter 4. It should be made clear that there will be no relaxation of the planning regulations for the sake of intensification. There should also be a commitment to early and comprehensive consultation with neighbours	Concern over transitional areas impact re high density development  Commit to early consultation	Chapter 5 and the site allocations provide the criteria and standards against which proposals will be assessed. Various amendments have been made as a result of the consultation which has sought to strengthen these and ensure they are applied robustly. The new Localism Act has finally introduced a requirement upon developers to consult the community on their proposals prior to submitting their planning application. This is to provide for earlier engagement, enabling the community to influence the overall concept of development schemes before they are fully worked up. The Council is to publish guidelines shortly on our expectations for pre-application developer consultation.
9	Para 4.4.2	What is the opportunity area mainly to the east of Station Road? How will this be developed; currently it is in individual small ownership. More detailed analysis and planning should be provided. If you are suggesting it here, why not elsewhere in the Intensification Area where there are not identified sites i.e. south end of Station Road on the east side?	More detail re multiple ownership site assembly	The AAP policies provide criteria that enable the assessment and determination of development proposals for both allocated and non-allocated sites, such as those east of Station Road. However, the reason no sites within this area are identified for allocation is that none are considered available or deliverable (i.e. they are not sites put forward through various calls for sites)
9	Para 4.4.3	They are key sites and they are in transitional area. Their scale should therefore reflect this and no suggestion of tall buildings should be made.	Transitional zone management and tall buildings	Within the Harrow town west sub-area, although a transition, development is intended to define and form a solid edge to the town centre boundary. Within the Harrow town east sub area, the allocations make clear the need for transition across the sites.
9	Para 4.4.4	There is NO appropriate part of the Intensification Area to locate tall buildings. The views assessment demonstrates this. The church and The Hill sufficiently mark the Town Centre's Borough wide role and importance.	Objection to Tall Buildings	While the important feature of the Harrow town centre skyline is Harrow Hill and St Ann's spire, the views assessment seeks only to safeguard identified views from visually intrusive development. As clearly set out by the Secretary of State in the Dandara appeal decision, the fact that the proposal broke the ridgeline did not make it unacceptable.
9	Para 4.4.5	How is an east west link going to be formed round the railway? This is not necessary nor crucial. Kodak should be seen as independent of Wealdstone. Wealdstone needs serious regeneration in its own right or it will die.	No need for new link over railway	See previous comment to the same respondent about the same issue
9	Fig 4.2 Intensification	Why repeat figure 1.2?	Duplication of key diagram	The diagram has been split up in the final document. The first to provide a simple summary of the changes

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	Area key diagram			proposed by the AAP, the second to reflect the layers of changes from the new maps/figures in support of the policy topics
29	Section 4.5	The provision of more green space and improved green grid is welcomed and supported, please see comments above also	Open Space & Green Grid	Support is noted
9	Para 4.5.1	No taller buildings required.	No taller buildings required.	See previous comments and amendments to Policy AAP6
25	Town centre office blocks	It is acknowledged that there is vacant office space in Harrow town centre and that much of this is in urgent need of upgrading to meet the needs of the 21 <sup>st</sup> century and so to attract new businesses to Harrow (para 2.4.8). However the Spatial Strategy at 4.5.1 envisages a smaller office market with reduced floor space. Thus it seems that some of the existing office space, including some prime sites, will not be needed at all and could be earmarked for other uses, thus aligning the AAP more closely with the widely accepted principles of Sustainable Development.	Office supply	The strategy is about office renewal. Where offices are currently vacant these should be redeveloped as part of a mixed use scheme, with the residential component enabling the re-provision of new office floorspace within the development. This therefore reduces the overall levels of office vacancy across the town centre and provides for modern office stock. Only when the vacancy rate is significantly reduced will this begin to drive a new more buoyant office market in the town centre.
9	Fig 4.3: Artist's impression	Unintelligible drawing.	Unintelligible drawing.	Noted
9	Intensification Area key diagram	This plan is too simplistic and only deals with identified development sites. It fails to recognise the more difficult issues.	Lack of analysis	Is intended to provide a simple overview of the changes proposed by the AAP. The Council considers it does this but has looked at measures to refine this further
47	Fig 4.2	P.32 Fig,4.2 Some colours are not shown in the Key. Are the delineations of the various uses in each of the Opportunity Sites fixed or are they indicative to show what type of provision would be accommodated on the site rather than the exact position, plot layout? I hope the former.	Error in key	The diagram has been refined as a result of the comments received and includes a more accurate key. The uses shown are the leading land uses for the allocated sites as set out in chapter 6 but the layout of the uses on individual sites is illustrative.
13	Vision	There is a great deal that's good in the overall vision and balance of the draft AAP.	None	General support for the vision and balance of the AAP is noted
32	Vision and Strategy	This chapter outlines the overall vision and spatial strategy for the AAP and its associated sub-areas. In light of the discussions and Inspector's comments made at the Core Strategy Examination-in-Public, we would support reference to the fact that Harrow town centre is the most appropriate location for a tall 'landmark' building and the importance attached to our client's site. Our client supports the approach that the Council has now adopted in the identification of individual sites within the AAP	None	Support for the use of site names rather than the current developer is noted. Amendments will be made to ensure this is applied consistently

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>in that these are identified by their location and not by virtue of the proposed developer/existing owner or, for that matter, its existing or previous occupier. However, there are a few instances where the relevant change has not occurred and these should be amended as well.</p>		
50	Vision and Spatial Strategy	<p>This chapter outlines the overall vision and spatial strategy for the AAP. Land Securities support the key objectives for the AAP to deliver the vision for the Intensification Area. We particularly welcome the acknowledgement for 'consolidation' of industrial areas and mixed use development of sites no longer suited to large scale manufacturing/warehousing uses to achieve the objectives of the Intensification Area and the Harrow View (Kodak/Zoom Leisure) site will make a significant contribution to meeting employment and housing targets and provision of new community and green infrastructure within the Intensification Area.</p>	None	Support for the overall vision and spatial strategy is noted
27	Strategic Vision	<p>The borough has considered creating a new Library, a Theatre, an improved Leisure centre and performance spaces many times over the last quarter of a century. These were not built during the times of economic plenty. It seems unlikely that there will be funding whilst we are encumbered with a debt laden economy. The Area Action Plan seems to have reactive approach for the creation of civic amenities based on contributory investment from developers. This failed with St Georges when the proposed Theatre was removed from the construction.</p> <p>The community needs clear and urgent direction for these civic amenity developments to ensure support across the borough. They will be supported and valued because they can improve facilities and enhance the appeal of the area.</p>	Viability of new cultural facilities	<p>A detailed delivery programme has been prepared to support new development within the Heart of Harrow. This is being supported by the preparation and introduction of a Harrow Community Infrastructure Levy to help pay for the new infrastructure. We have not had many significant applications of recent times for development within the Heart of Harrow but the Council is encouraged that many of the opportunity sites identified have already attracted developer interest and are already beginning to discuss proposals with us.</p> <p>The plan does take a cautionary approach to the creation of civic amenities, as these require significant up-front and continuous investment – which the Council does not have. Priority is therefore given over to those items of infrastructure needed or critical to support growth</p>
29	Vision and Spatial Strategy	<p>The Area Action Plan Objectives are listed under section 4.3 and can be broadly supported, especially objectives</p> <p>11) Open Space provision 12) Environmental Improvements/Enhancements</p> <p>In respect of these 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</p>	Use ANGST Standards	<p>Support for the objectives is noted, as is the references to green infrastructure provision.</p> <p>The ANGST standards are national standards. As set out in the Council's response to the Core strategy representation made by Natural England, the applicability of which within the existing built-up city of London context, whilst desirable, are unlikely to ever be achievable. References to the ANGST standards were therefore not made within the adopted</p>

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		<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• No person should live more than 300 metres from their nearest area of natural green-space;</li> <li>• There should be at least one accessible 20 hectare site within 2 kilometres;</li> <li>• There should be one accessible 100 hectares site within 5 kilometres;</li> <li>• There should be one accessible 500 hectares site within 10 kilometres.</li> </ul> <p>Natural England is pleased to see the consideration and reference to Green Infrastructure through the provision of enhancements and increased access to open spaces as part of sustainable development, this should be a key component of all spatial development plans and its inclusion in this document is welcomed.</p>		<p>Harrow Core Strategy and are not appropriate for the Heart of Harrow AAP. Nevertheless, the ANGST standards have been considered and assessed as part of the PPG 17 sport, recreation and open space study so requirements and deficiency in this regard now forms part of the evidence base that has informed the AAP, and in particular Policy AAP11-13.</p>

## Chapter 5 – AAP Policies

### AAP Policy1

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
24	AAP Policy 1	<p>Broadly supported. The opening emphasis on high quality design is particularly welcome. The Council is invited to consider introducing a policy that would seek a vacancy strategy for ground floor retail/commercial units to avoid periods of inactivity (e.g.</p>	Vacancy strategy	<p>Agreed. However, the Council considers that the inclusion of a vacancy strategy sits better within the context of Policy AAP17 &amp; AAP18, which deal with the integrity of the retail core of the town centres.</p>



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		before an occupier is in place, in between lettings). This should promote interim community uses where possible, and encourage activity to avoid blank facades or empty units fronting the street, supporting the principles of London Plan Policy 7.3.		
29	AAP Policy 1	The Council should give consideration to provision and benefits of green infrastructure and soft landscaping as part of a holistic approach to development, linking in with health opportunities as well as helping to promote walking and cycling initiatives, linking in to wider Council objectives	Green infrastructure and landscaping	Agreed, AAP Policy 4 f inserted to include green infrastructure and soft landscaping as part of the scheme design considerations
32	AAP Policy 1	Policy AAP 1 sets out the guidelines for assessing development proposals within Harrow town centre. In principle, our client's support these guidelines but comments that these should also make reference to the role that development within the town centre should have in contributing to its needs in respect to the provision of new and enhanced retail, office, residential, community and leisure uses reflecting the overarching objectives of the AAP and paragraph 3.4 which seek enhanced and better quality facilities and which promotes the night-time economy of Harrow. Specifically, point a) referring to design states that proposals should contribute to the <i>'identity of Harrow town centre'</i> . It is unclear what this means or what the identity of Harrow town centre is. The architectural style and quality within Harrow town centre is limited and this was discussed at length at the Inquiry into our client's proposals. Reference to the identity of the town centre of Harrow therefore needs to be further expanded on and a definition provided.	Reflect contribution of development to meeting objectives  Define the identity of Harrow town centre	Policy AAP1 Aa and Ab have been amended.
47	AAP Policy 1	P.36. AAP1 Does this wording prejudice / conflict with AAP6?	Potential conflict	While the Council did not consider there to be prejudice or conflict between the tow policies, it should be noted that Policy AAP6 has been subject to amendment to respond to the comments received. However, it is difficult to know if this has resolved the potential conflict identified as it is unclear from the comment, which part of Policy AAP1 potential conflicts with which part of Policy AAP6.
54	AAP Policy 1	We would encourage the Council to include a bullet point within section A of the policy to address the need for developments to conserve and enhance the significance of heritage assets, including their settings, especially the existing setting of St Mary's Church and Harrow-on-the-Hill. At present the policy wording falls	New heritage bullet point	Agreed. However the Council considers this is matter pertinent across the AAP area and not just to Harrow town centre. Therefore the suggested addition has been made to AAP4

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		<p>short of recognising the need to protect this key heritage feature, and one that helps define the context of Harrow Town Centre. Paragraph 5.1.6 seeks to address this concern in terms of 'sensitive character', but we would suggest that this sentiment should be strengthened and made more explicit in the context of conserving the town centre and surrounding heritage assets. We note that policy AAP8: Enhancing the Setting of Harrow Hill is included, but at present there is a lack of connection between these two important policies.</p>	<p>Relate to policy 8</p>	
9	5.1 Character and Amenity	<p>Harrow Town Centre is identified on Fig 3.1 as a distinctive district. What are the 3 sub areas?</p>	<p>Sub areas</p>	<p>Figure 3.1 and its key, show and identify the three character / sub areas that form Harrow town centre. These are Harrow Town East, Harrow Town Central and Harrow Town West. No change</p>
9	Para 5.1.2	<p>Why should many existing buildings remain Owner of Old, poor, low density buildings? Should be encouraged to redevelop.</p>	<p>Encourage redevelopment</p>	<p>Over the life of this Plan, which is 15 years, we are unlikely to see all sites in need of regeneration come forward for redevelopment. The pace of redevelopment will depend on market conditions and the ability to sell or let redeveloped properties to the market. Phasing of development is key to prevent market saturation.</p>
19	Para 5.1.3	<p>Agree comments in para 5.1.3 on architectural features, finishes, location of entrances on corner sites, and durable materials. Question the preference for durable materials for the ground and first floors - with the implication that anything can be used on higher floors - access for maintenance is easier on the lower floors - unwise to introduce a maintenance requirement where access is limited. Agree preference for reuse of buildings with existing character, and (5.1.4) new buildings to be easily adapted for new uses. Para 5.1.11 agree plant on the roof should not intrude on the appearance of the building. Welcome (5.1.23) the intention to restore the Art Deco character of the Safari cinema - Art Deco is a valuable part of Harrow's architectural heritage. Assume the ABC cinema was reclad in the 60s for reasons of fashion (i.e. when Art Deco was under a cloud). If the recladding was because it was in poor condition the operation might not be economic. Welcome (5.1.51) control over street clutter and rationalisation of street furniture, and control over A-boards and advertising (5.1.57). Note there is a conflict between the desire to reduce</p>	<p>Design principles</p> <p>Potential conflict re de-cluttering and new signage</p>	<p>Agreed, the reference to 'particularly at ground and first floor levels' has been removed to ensure the use durable and easy to maintain materials applies to all floors. Support for other particular elements of the policy are noted The Council acknowledges the potential conflict re de-cluttering of streets and the provision of new way finding signage but considers this can be overcome through the design and integration of the way finding signage. Amendments have therefore be made in reference to the provision of way finding signage that this is to be designed so as not to add to street clutter.</p>

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		street clutter and the desire to improve signage (e.g. in para 6.5.3).		
9	Para 5.1.4	“Considered” can mean thought about and then rejected! Be more forceful.	Wording	The policy requires adaptable building form at ground and first levels. While the supporting text provides two examples, it needs to be recognised there are many ways to which this may be achieved and will depend on site circumstances, proposed use and overall design concept
9	Para 5.1.6	Can only be achieved if a Town Centre Design Guide is produced.	Produce a Town Centre Design Guide	Disagree. The Council considers that the AAP is a more robust means by which to manage the relationships between sites.
9	Para 5.1.12	“High quality” is too subjective.	Clarification	While the Council agrees that matters of design and architectural merit are subjective, planning policy is too much a blunt tool to overcome this. The purpose of the AAP is to guide development in terms of appropriate uses and the standards and design parameters expected to be met. However, within that context, flexibility must be retained to enable a design-led approach to determining the best outcomes for individual sites, recognising that high quality is not just about the finishing’s to buildings but their layout, massing, relationship with neighbouring development and street scene, how they add to the urban grain and character of the area, provide liveable environments, internal circulation... and the list goes on. And what works for one site may not work for another, and therefore to achieve high quality, the design of development must be specific/bespoke to the context of the site. No change

## AAP Policy 2

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 2	Broadly supported. The Council should refer to comment 1 which seeks a vacancy strategy for ground floor retail/commercial units.	Vacancy strategy	Agreed. However, the Council considers that the inclusion of a vacancy strategy sits better within the context of policies AAP17 & AAP18, which deal with the integrity of the retail core of the town centres.
24	AAP Policy 2	The Council is also invited to consider whether a policy advocating	Street Trees	Agreed. Policy AAP2 A(b) amended to include the

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		the planting of street trees would promote the boulevard character to which Policy AAP2 refers, whilst simultaneously supporting the aspirations of the Harrow Green Grid network and London Plan Policy 5.10 on urban greening.		creation of a green boulevard
29	AAP Policy 2	See comments above which are also applicable to all development within the Area Action Plan area.	Green infrastructure and landscaping	Agreed, AAP Policy 4 e amended to include green infrastructure and soft landscaping as part of the scheme design considerations
9	Para 5.1.19	What is a height appropriate to define and enclose the street?	Define height	The width of Station Road varies along its length, so the height required to enclose the street will also vary. However, the Council considers the alignment of the street frontage rather than height to be the important aspect for Station Road and has therefore removed the reference.
9	Para 5.1.20	Who are the Council's partners?	Partners	These are set out in Chapter 1 – delivery partners include the GLA family, Transport for London, Harrow PCT, developers, landowners, Free school applicants etc
19	5.1.23	Welcome (5.1.23) the intention to restore the Art Deco character of the Safari cinema - Art Deco is a valuable part of Harrow's architectural heritage. Assume the ABC cinema was reclad in the 60s for reasons of fashion (i.e. when Art Deco was under a cloud). If the recladding was because it was in poor condition the operation might not be economic.	Safari cinema	Support for the restoration of the Safari Cinema – subject to viability, is noted.

### AAP Policy 3

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	Policy AAP3	Broadly supported. The Council should refer to comment 1 which seeks a vacancy strategy for ground floor retail/commercial units	Vacancy strategy	Agreed. However, the Council considers that the inclusion of a vacancy strategy sits better within the context of policies AAP17 & AAP18, which deal with the integrity of the retail core of the town centres.
49	AAP Policy 3	Our client offers their support for Policy AAP3 given that it represents a pro-development agenda, focusing on the need to strengthen the vitality and identity of the district centre. This can clearly only be achieved through increased investment. It is noted that the policy encourages growth within the sub-areas in the general conformity of the masterplan for each site. Given	Building heights	Support is noted The heights set out in the site allocations are based on a detailed urban design assessment. The Council therefore considers these to represent the appropriate building height(s) for each site

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		the comments in the preceding section of this letter, our client is obviously happy with this strategy, subject to a recognition that it is an illustrative plan at this time, with details such as indicative heights not necessarily being absolute maximums if it can be clearly demonstrated that taller, landmark buildings could be appropriately provided. The specific, headline requirements in AAP3 relating to Wealdstone Central are supported.		
50	AAP Policy 3	Policy AAP 3 sets out the guidelines for assessing development proposals in all three Wealdstone sub-areas. Criteria B states that <i>“proposals for the development of identified opportunity sites within the three Wealdstone sub areas should be in general conformity with the masterplan for each site as set out in Chapter 6.”</i> We consider that it is more appropriate to refer to the site specific guidance in chapter 6 as ‘development principles’ rather than ‘masterplan’, given that this section provides the principles which should guide future masterplans for the site. It is not the role of the AAP to prescribe a masterplan, nor to define design criteria which should be subject to a robust urban design analysis forming part of a formal planning application. The AAP should set parameters and a vision and accordingly we find it unsound.	Masterplans	Agreed. Reference to ‘masterplan’ has been replaced with ‘site objectives and development parameters’

#### AAP Policy 4

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Policy AAP4	We support the reference to water efficiency in ‘Policy AAP 4: Achieving a High Standard of Development throughout the Intensification Area’.	Water efficiency	Support is noted
13	AAP Policy 4	policy AAP 4 add a sustainability / green clause as above	add a sustainability / green clause	Policy 4 f inserted to include green infrastructure and soft landscaping as part of the scheme design considerations
24	AAP Policy 4	Broadly supported. The requirement for high quality, durable and serviceable materials to maintain a high quality finish over time is particularly welcomed in accordance with London Plan Policy 7.6. The Council is also invited to consider whether a policy securing a	Maintenance strategy	The Council can and does seek maintenance arrangements for communal areas but not for private buildings. Depending on ownership, the maintenance responsibilities, and any strategy therein, falls to the

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		maintenance strategy for major development proposals within the intensification area would favourable supplement this approach.		owner or a body corporation. To include this as a policy requirement seems overly onerous
49	AAP Policy 4	<p>Policy AAP4 sets out good practice guidelines for the Intensification Area that are logical, being in line with other adopted and emerging Local and Mayoral policies. Offered particular support and strongly urged to be retained in the final version is AAP4 criteria C, which states:  “Development that would prejudice the future development of other parts of a site, adjoining land, or which would frustrate the delivery of adopted plans and allocation Opportunity Sites in Chapter 6, will be resisted”.  This is considered to be an important reference in order to ensure that sites are able to meet and provide the development objectives and outputs clearly set out for each of the areas. It is considered that this demonstrates ‘joined-up’ thinking throughout the AAP and should clearly be retained in the adopted document.</p>	AAP4 C	Support is noted. This reference is to be retained in the final document
34	Design	<p>We would like to make the following comments/suggestions:</p> <ul style="list-style-type: none"> <li>• The document acknowledges the importance of high quality architecture and design and promises new buildings will live up to these principles. We would like to see this commitment to quality applied to every planning application – large or small – that comes before the planning committee and, crucially, for these principles to apply to any subsequent amendments to plans, particularly for large-scale developments. To date, we have been very disappointed with the poor quality design and architecture of major building projects including the Harrow Central Mosque.</li> <li>• Any new homes must tie in with the character of existing properties and houses must have adequate garden space. Designs must incorporate storage space for bins to avoid front gardens being dominated by a sea of wheelie bins. We are concerned at the idea that the majority of new homes in the Station Road area will be in buildings that are three to six storeys high and risk over-shadowing or dominating neighbouring properties with a potentially negative impact on existing residents’ quality of life</li> </ul>	Design Quality        Character  Waste storage and collection	<p>Support for high quality design is noted. The policy applies to all development, regardless of size.</p> <p>Policy AAP13 requires provision of a range of housing types and sizes, commensurate to the character of the sub area in which it is located</p> <p>Policy AAP4 has been amended to requirements for on site provision of waste collection and disposal.</p> <p>Policy AAP2 B requires the design and layout of new development within the Station Road sub area to respect the scale and character of surrounding residential areas</p>
9	Para 5.1.34	Who will define and decide which sites would benefit from a more	Clarity	This is in respect of allocated sites in Chapter 6. This

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		comprehensive planning policy?		provision does not prevent different parts of a site coming forward for redevelopment at different times but seeks to ensure that partial development of sites does not compromise a comprehensive proposal for the whole site from being realised.

## AAP Policy 5

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
36	AAP Policy 5	<p>The AAP rightly emphasizes high quality design for developments in the IA but maintaining housing standards is equally important. Unfortunately some parts of the AAP seem to invite compromise. For example paragraph 5.1.32 implies that overlooking could be tolerated as long as sound insulation of flats is up to standard. This should not be an either-or situation. There is no excuse for sound insulation to be substandard, whatever the other considerations of a development.</p> <p>Another example is the treatment of housing density in Policy AAP5. Paragraph C states that the density of residential developments should conform to the density matrix set out in the London Plan. The next paragraph, D, then goes on to explain how developers can disregard the density matrix if their design is judged to be exceptional and they are willing to pledge more funding for infrastructure. The density matrix itself is not generous and any developments within the intensification area will be in the highest range allowable because of proximity to the stations. The need for infrastructure funding is pressing but it should not be sought at the cost of overcrowding. Paragraph D should therefore be removed and the Council should make clear its intention to uphold housing standards.</p> <p>With regard to housing mix, there seems to be a contradiction. Paragraph 5.5.2 states that most housing in the town centres will be flatted developments suitable for smaller households, but it also states that developments of 100+ dwellings will be expected to provide a greater proportion of larger family units. The key sites identified in the town centre (Bradstowe House, Neptune Point, 51 College Rd, Lyon House, Gayton Road ) are all planned, to</p>	<p>Design standards</p> <p>Density</p> <p>Family housing</p>	<p>Agreed. All development should be required to meet the appropriate standards. Paragraph 5.1.32 has been amended.</p> <p>Agreed. Paragraph D has been deleted. Having regard to the comments made, Policy F and the supporting text has been amended to address proposals for the potential 'over development' of sites.</p> <p>With regard to paragraph 5.5.2, this states that developments over 100+ units should provide a greater portion of larger units (3+ bedrooms). This is not concerned so much with provision of family housing but rather housing choice and provision of a mix of housing. Provision of family housing within the Heart of Harrow is to be made on allocated sites outside of the town centres, such as Zoom Leisure and Kodak, Colart and the Leisure Centre sites.</p>

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		provide well over 100 housing units each, and therefore should offer significant family housing. This highlights a central paradox in the Council's housing policy which is brought about by the decision to concentrate new housing in the IA: The most urgent need is for family housing but the housing offered by the new residential developments in the IA will be unsuitable for families. Given that we are now stuck with this policy, the best way of solving the paradox is to ensure that some housing on these sites is of a more suitable, low rise design. This would also avoid social segregation in the IA, and the need for tall buildings (see below).		
25	5.1.32	Para 5.1.32 envisages the possible need for compromises in matters of privacy and amenity for homes in the Intensification Area where housing densities will be higher than elsewhere in the borough. AAP 5D says that London Plan housing densities might be exceeded in those instances where '... development proposals exhibit exceptional design and the achievement of higher amenity and environmental standards and will make an appropriate contribution to on and off-site infrastructure provision ...'. The message to developers here seems clear: 'in return for a bit more Section 106 money, feel free to pack 'em in.' We are strongly opposed to any move to exceed London Plan densities and to any sort of trade-off between "traditional concepts of privacy and amenity" which we regard as short sighted at the very least. The future success of Harrow depends on it being seen as a good place to live	Density	Agreed. Paragraph D has been deleted. Having regard to the comments made, Policy F and the supporting text has been amended to address proposals for the potential 'over development' of sites. In addition, Paragraph 5.1.32 has been amended to ensure all development is required to meet the appropriate standards.
9	Para 5.1.39	There is no guidance provide in Chapter 6. There needs to be a Design Guide.	Design Guide	Development guidance is provided by the Policies of Chapter 5. Chapter 6 covers allocations and site specific development parameters. Amendments have been made to the AAP to clarify this

## AAP Policy 6

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 6 (C)	<ul style="list-style-type: none"> <li>a. AAP6/C. the Views Assessment offers no opportunity for tall buildings in Harrow Town Centre.</li> <li>b. It is very unlikely that developments in Harrow will be of exceptional architectural quality and design. The rental values</li> </ul>	All buildings	



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		<p>will not allow this.</p> <p>d. Tall buildings will never achieve a positive relationship with Harrow on The Hill.</p> <p>e. Tall buildings will never enhance the skyline.</p> <p>f. All buildings should secure a complete and well designed setting at street level. Tall is not relevant.</p>	to secure a complete and well designed setting at street level	
9	Policy AAP 6 (E)	"will be rejected" rather than "resisted".	Reject rather than resist	Agreed. Policy amended to state refused
36	AAP Policy 6	<p>This topic was the one that raised most concern from residents during the consultations on both the Core Strategy and the earlier draft of the AAP. In the end the core Strategy was left vague and we were promised more detailed treatment in the AAP, but Policy AAP6 (Development Height) fails to deliver this. In the earlier section headed 'Opportunities', paragraph 3.5 tells us that 'achieving the Core Strategy targets will require taller buildings'. Why? There are plenty of examples of high quality, low rise developments in inner London boroughs which deliver high density housing while remaining on a human scale (e.g. the Camden projects overseen by Sydney Cook and the Donnybrook Quarter in Bow).</p> <p>Table 6.3 shows that the expected output total for housing just from the sites already identified in the IA, is substantially higher than the target stated in the Core Strategy. If this unnecessary extra burden was reduced the need for high density housing would also be reduced.</p> <p>Elsewhere in the AAP there are suggestions that tall 'landmark' buildings are necessary to reflect the metropolitan status of the town centre, but the success of a town depends much more on how well its buildings work for the people that use them, than on their visual impact. Beware white elephants.</p>	<p>Lack of guidance on tall buildings – also not necessary for high density design</p> <p>Housing target too high</p> <p>Tall buildings not necessary</p>	
24	AAP Policy 6	Area Action Plan Policy AAP6, in conjunction with site specific guidance in Chapter 6, addresses the approach to development height within the intensification area. The Council's intention of using this policy to carefully manage the development of tall buildings within the intensification area through the identification of appropriate, sensitive and inappropriate locations is supported in accordance with London Plan Policy 7.7.		Support for approach noted

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		<p>The cross-reference to detailed site specific guidance in later sections is supported, as is the intention to provide guidance for proposals coming forward on non-allocated sites. The operation of this policy, in conjunction with AAP8 on local views, will be key to the successful delivery of the high quality interventions envisaged. The Council is invited to consider how a single strategic diagram (identifying protected views and constraints, sensitive areas, and opportunity sites within the intensification area) could help to reinforce the relationship between these policies, and provide additional indicative guidance for non-allocated sites. Officers would welcome the opportunity for further informal engagement on the development of this policy, and its relationship with AAP8, ahead of the next stage of consultation.</p>	<p>Consider a diagram that identifies protected views and constraints, sensitive areas, and opportunity sites within the intensification area</p>	
49	AAP Policy 6	<p>The above comments in respect of height are considered to fit with the objectives of Policy AAP6 which encourages tall / landmark buildings in appropriate locations. Given the requirements of an urban design analysis to be provided with proposals for tall buildings, it would be useful within AAP6 to define over what height a “tall building” would be considered such.</p>	<p>Define the height of tall buildings</p>	
54	AAP Policy 6	<p>In general we welcome this policy subject to an explicit reference to the need for tall building proposals being considered against the impact they may have upon the significance of heritage assets. This would reflect EH/CABE Guidance on Tall Buildings (2007) and the London Plan (2011) policy 7.7.</p>	<p>Add reference to considered against impact on heritage assets</p>	
32	AAP Policy 6	<p>Policy AAP 6 deals with development height and comments (AAP6 A) that the appropriate height of development of opportunity sites within the Intensification Area will be guided by the parameters set out for each site in Chapter 6 of the AAP. We would comment that the design considerations section for each site provides no parameter for height and the only indication within each section is an annotation on the associated ‘Figure’. These figures are annotated ‘Potential Site layout of preferred option’ (our emphasis) and are not identified as setting parameters. In addition, not all sites have an associated ‘Figure’ or any text in the design considerations section establishing the parameter. We would</p>	<p>Parameters don’t specify height</p> <p>Figures could be overly</p>	

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		comment that if these figures are intended to constitute the parameters then this would overly restrict design development and would not allow the undertaking or a proper urban design analysis to be undertaken to establish what might be the most appropriate form of development for a site.	restrictive and prevent proper design analysis of the site	
32	AAP Policy 6	<p>AAP6 C confirms that proposals for tall buildings will be considered within the criteria set out in the London Plan as well as accord with the limits set out in the Development Management DPD, local and strategic views, as well as a number of other local criteria. Having regard to the 'local criteria' we would comment that in the absence of the Development Management DPD (APP Ca) it is not possible to consider the implications of this policy fully or on the opportunity sites identified within the AAP. We would also comment that the relevant policies/limits should be contained solely within the AAP DPD given that its purpose is to provide the policy framework for the AAP. The document should be amended accordingly.</p> <p>Criteria APP6 Cc proposes public access to rooftops or top floors of all tall buildings. This requirement is considered inappropriate and accordingly our client objects for a number of reasons, including:</p> <ul style="list-style-type: none"> <li>□ There is no policy basis for such requirement. The London Plan states that tall buildings should incorporate publically accessible areas on the upper floors, where appropriate. This is wholly different to the draft wording of Policy APP6 which states that public access to the rooftop or top floor should be provided.</li> <li>□ The definition of a tall building within the London Plan and within Harrow's Core Strategy is hugely different. The implication of draft Policy APP6 is that any building circa 10 storeys should have a publicly accessible rooftop or top floor. This is wholly unrealistic. The objective of the London Plan seeks to ensure that taller buildings (which are by its own definition substantially taller than their surroundings or make a significant change to the skyline) have public accessibility, however this is easily incorporated in central London where the majority of tall buildings (by London Plan definition) are proposed in the form of restaurants, hotels, bars etc. It is unrealistic to expect this to be in anyway commercially viable in Harrow let alone in every building of 10 storeys or over.</li> </ul>	<p>relevant policies/limits should be contained solely within the AAP DPD</p> <p>Oppose rooftop access requirement</p>	

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		<p>☐The requirement fails to have consideration to the context in which the building is located or its proposed purpose/use and could, as a result, lead to a development that fails to delivery or maximises on the provision of wider or better opportunities including, for example, enhanced ground level public realm;</p>		
32	AAP Policy 6	<p>☐Rooftops are invariably the locations for the provision of sustainable and renewable energy (Photovoltaics), for green/brown roofs to support biodiversity or the location of communal open space for residential occupiers. Public access would compromise each of these and potentially lead to conflicts with other statutory development plan policy requirements, including for example Policy AAP 12 and improving biodiversity opportunities;</p> <p>☐The provision of public access, and associated health and safety requirements, will place an inappropriate additional cost on a development and give rise to on-going public liability and maintenance requirements that would need to be borne. In the case of a predominantly residential block, this would be by residential occupiers (including affordable housing occupants) through service charges. It will also give rise, specifically in residential buildings, to issues of privacy and security for residential occupiers. The cost of providing a publicly accessible viewing area in this context would be a community benefit and would therefore need to be factored into a viability assessment and/or offset against other community benefits delivered by a proposal. This would only seek to draw developer contributions towards providing wasted, under used spaces.</p> <p>In the context of public access to the top of tall building, our client is significantly disappointed that this has never been raised in previous discussions, particularly given paragraph 1.4.5 which claims that the involvement of private developers has enabled the proposals to be moderated through knowledge of the likely means of implementation. This clearly has not been the case and as our client has the only site in the AAP area where the principle of a tall building has been established, public accessibility should have been mentioned during the on-going discussions with the Council. With respect to Criteria APP6 Cd, e and f these are a matter for</p>	Oppose rooftop access requirement	

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		<p>the urban design analysis which should, in addition, demonstrate how a proposal responds to these criteria. Accordingly we consider that these elements should be deleted and APP6 D amended to read:</p> <p><i>All proposals for tall buildings must be accompanied by an urban design analysis which sets out:</i></p> <ul style="list-style-type: none"> <li><i>a. how the proposed development relates to development adjoining each boundary, and surrounding topographical features;</i></li> <li><i>b. Contributes to the skyline;</i></li> <li><i>c. Integrates within the street scene particularly at ground level; and</i></li> <li><i>d. Includes an assessment of impacts upon local, medium and long-distance views and places.</i></li> </ul>	Amend AAP6 D as stated	
32	AAP6 E	<p>APP6 E refers to development of an inappropriate height and tall building proposals which conflict with the London Plan and the findings of the Local View Assessment (2012).</p> <p>The requirement to undertake a Local View Assessment formed part of our client's objection to the Core Strategy and the Council confirmed in the EIP that they would undertake a review and formally identify those views and features of importance. This document has been prepared and published as part of the LDF evidence base criteria but we would object to its content not least as a visual impact assessment of the proposed development on protected and non protected views (informed by a large number of verified photomontages) was carried out by both our clients and the Council (represented by the party who has now prepared the views analysis) at the 51 College Road appeal where this visual impact evidence was fully tested in cross-examination. In respect to those assessments the Inspector, in his analysis, confirmed that the site was, 'in principle', suitable for a tall building and specifically in respect to views from the Grove, stated that:</p> <p><i>" I think the key here is separation. It is evident when standing at the viewpoints nearer to Lowlands Road that the appeal site is on the opposite side of the railway lines and in the town centre. Tall buildings would certainly change the view but I fail to see why well-designed tall buildings should be harmful to character or setting, or the enjoyment by the public, of the Lowlands Recreation Ground and the Grove Open Space. . From higher viewpoints on the</i></p>	Objection to Views assessment	

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		<p><i>Grove, the extent of obstruction of views of the Harrow Weald Ridge skyline by tall buildings on the appeal site would not be great. It would be self evident that the Ridge ran continuously behind the buildings. 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 from the higher parts of the Grove Open Space.”</i></p>		
32	AAP6 E	<p>In considering the Inspector’s recommendations the Secretary of State determined:  <i>“The acceptability in principle of tall buildings on the site. The Secretary of State agrees with the Inspector’s reasoning and conclusions on the acceptability in principle of tall buildings on the site as set out in IR159-171. He agrees that 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 (IR160). He agrees with the Inspector’s conclusion that there is no objection in principle to tall buildings on the appeal site (IR171).”</i></p> <p>It is our client’s view the failure of the Views Assessment to consider the implications of this appeal decision, the recommendation of the Inspector in assessing the physical evidence which had been properly tested in cross-examination, and the decision of the Secretary of State establishes that the View Assessment evidence is flawed. The Inspector at the Core Strategy EiP was explicit that the Secretary of State’s decision was an over-riding material consideration to which considerable weight should be attached and which established the principle for 19-storeys on this site. The evidence presented within the View Assessment simply reiterates the arguments presented at the Inquiry. As with the Core Strategy, our clients are of the opinion that the Secretary of State’s decision and acceptance of a tall building at this site should be explicitly stated and this should, in addition to elsewhere, be acknowledged within this section of the AAP (or in the Site Specific Section) accompanied by commentary drawn from the Inspector’s Report and Secretary of State’s decision, as appropriate.</p>	<p>Views assessment should take into account the Inspector’s decision re 51 College Road</p> <p>Secretary of State’s decision and acceptance of a tall building at this site should be explicitly stated</p>	

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32	AAP6 E	Given our client's position in respect to this issue, they have commissioned 'Define' to carry out an analysis of the View Assessment Study that has been carried out and this is attached. This assessment makes it clear that the proposed maximum height restriction proposed within the View Assessment Study and reflected within the draft AAP contradicts the judgement made by the Secretary of State. Our client objects strongly to the approach adopted by the Council on this matter and in respect to the 51 College Road site and perceive it as an attempt to override the Secretary of State's position on the principle that a tall building, within the setting of the analysed views of the Views Assessment, would be acceptable. Our client considers that the AAP document should be amended to reflect the Secretary of State's position, as the Inspector at the Core Strategy EiP required on the Core Strategy, including appropriate references in the justifications to Policies AAP 6, 8 and others.	Secretary of State's decision and acceptance of a tall building at this site should be explicitly stated	
9	Para 5.1.45	The Intensification Area is not potentially suitable for tall buildings.	No Tall Buildings	
9	Para 5.1.46	The buildings that enjoy outstanding views over London should be identified. For many The Hill is in the way. If existing buildings offer these views then there is no need for taller buildings. The unique opportunity also exists from Harrow on The Hill. There is no justification for tall buildings based on the opportunity to help new London's spatial extent.	Identify existing buildings with views to London no justification for tall buildings	
9	Para 5.1.47	This is impossible. There is no way the skyline of the Intensification Area should be enhanced by tall buildings. "Should" needs to be removed. "Might not".	Objection to tall buildings	

## AAP Policy 7

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 7 (C)	How can east west links be a priority if they cannot be achieved?	Viability of east west links	The Council acknowledges the physical barrier that the mainline railway line represents but considers that improvements can still be made to promote better

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				east/west links. In addition to improvements to the underpass as part of the Kodak development, east/west links will be provided through the provision of a green link through the Zoom Leisure and Kodak site, through links from the Teachers Centre, through the Colart site onto the High Street, as well as provision for a future footbridge or underpass across the railway connecting the main Kodak site with Tudor Road.
29	AAP Policy 7	As per our comments above, the Council should give consideration of green infrastructure and soft landscaping where appropriate as part of a permeable public realm	Green infrastructure and landscaping	Policy AAP4 f has been amended and applies to all development in the Heart of Harrow including proposals for urban realm improvements.
19	5.1.51	Welcome (5.1.51) control over street clutter and rationalisation of street furniture, and control over A-boards and advertising (5.1.57). Note there is a conflict between the desire to reduce street clutter and the desire to improve signage (e.g. in para 6.5.3).	Potential conflict re de-cluttering and new signage	Support for control over street clutter and advertising boards is noted. The Council acknowledges the potential conflict re de-cluttering of streets and the provision of new way finding signage but considers this can be overcome through the design and integration of the way finding signage. Amendments have therefore been made in reference to the provision of way finding signage that this is to be designed so as not to add to street clutter.
9	Para 5.1.56	So how will a dark heavily trafficked underpass be improved?	Clarity	Better access, lighting, improved materials used within the underpass
9	Para 5.1.58	“Formation” should be changed to “protection and formation”.	Views	The use of the term ‘formation’ applies to potential views from within the Heart of Harrow that require development to take place to enable these to be realised. Only existing views can be protected.

## AAP Policy 8

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 8 (A)	b. What does this mean? It should not suggest tall buildings.	Clarity	This part of the policy is intended to encourage development that adds interest to the suburban silhouette in front of the Harrow on the Hill Area of Special Character. Tall buildings may (or may not) add interest depending upon their design and siting amongst other considerations. Policy criteria for tall buildings is set out



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				in Policy AAP6. Therefore <b>no change</b> .
24	AAP Policy 8	The emerging approach to identify, conserve and manage local views, informed by the Harrow Views Assessment (2012), is broadly supported. The Council should, however, include a reference within Policy AAP8 to any associated policies within the Development Management DPD (where applicable), and identify the need for development proposals that would be subject to protected views to submit a views assessment.	Link to DM policies and add in requirements for views assessment	The views and vistas development management policy is signposted at paragraph 5.2.11. As it has development plan status in its own right there is no need to make further, specific reference within Policy AAP 8. Therefore <b>no change</b> .
54	AAP Policy 8	We welcome the policy and the supporting text, subject to the significance of the heritage assets being referenced in the policy wording. The inclusion of these key words will help ensure the policy reflects the concept and principles of PPS5.	Reference significance of Heritage assets	The Development Management Policies DPD includes policies for the consideration of impacts upon heritage assets that takes account of their significance in accordance with the NPPF. This AAP policy deals with the impact of development within the Heart of Harrow upon the Harrow on the Hill Area of Special Character, which is a character rather than a heritage designation. Therefore <b>no change</b> .
9	Para 5.2.5	The silhouette and skyline is fine. It will not be improved without demolition of certain buildings. It cannot be improved by tall buildings for example. The Intensification Area does not require a new positive urban skyline.	Tall buildings and skyline	The Intensification Area will necessarily involve change to the skyline and this policy provides for its management to enhance rather than detract from the setting of the Area of Special Character. Policy AAP 6 deals with development height/tall buildings. Therefore <b>no change</b> .
9	Para 5.2.6	How can the selling of Harrow on The Hill be enhanced by tall buildings, it cannot. The transparent dome of St George's is an eyesore, especially at night then it acts as a light bulb.	Tall buildings and skyline	The Intensification Area will necessarily involve change to the skyline and this policy provides for its management to enhance rather than detract from the setting of the Area of Special Character. Policy AAP 6 deals with development height/tall buildings. Therefore <b>no change</b> .
9	Para 5.2.7	Harrow will never get world class architectural quality. When proposals for tall buildings come in they need to be assessed against other world class quality architecture by recognised design bodies.	Design assessment	The London Plan (Policy 7.7) requires tall buildings to incorporate the highest standards of architecture and materials. The Council will procure necessary expertise as required to assess proposals for tall buildings. <b>Paragraph 5.2.7 amended to reflect London Plan policy wording.</b>
9	Fig 5.1: proposed protected views	This figure needs to be at different scales so that the impact on the Intensification Area and Harrow Town Centre can be analysed more clearly. The thought that it has been contrived to allow Dandara tall buildings would be fraudulent.	Have a map at a larger scale	The local views identified for protection are identified in the Harrow Views Assessment (2012) and on the adopted policies map.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
30	Section 5 Fig 5.1	<p>Given that there are three sub-areas to the Intensification Area which have their own identities and characteristics (Harrow Town Centre, Station Road and Wealdstone) there could possibly be a Design Guide produced for each area. These Design Guides could then help property owners and developers understand the maximum limits of density and height and an expectation on mix, massing and aesthetic quality.</p> <p>The viewing corridors indicated on Fig. 5.1 are extremely narrow and 'home in' purely on the church of St. Mary's and its' immediate surroundings. From various vantage points within the borough one can enjoy the church and its hill-top setting. It is the whole sky-line view of the Hill surmounted by the church in its' silvan surroundings that is the much cherished emblem of Harrow. Whilst it is understood that the viewing points have been reduced to purely public-accessed areas the viewing corridors should be increased in width to ensure that the Hill as a whole is not visually impaired by tall buildings from these few vantage points. The viewing point from the cricket ground next to the spinney (by Headstone Lane) in Headstone Manor Recreation Ground should be included as it is a fantastic view of the Hill from a public place.</p>	<p>Produce design guides for the tree main sub areas</p> <p>Increase viewing corridors widths</p> <p>Additional viewing point proposed</p>	<p>The provisions of this AAP ensure a sufficiently robust framework for the assessment of density, height and design of proposals in the Intensification Area. The Council does not intend to produce separate design guides. Therefore <b>no change</b>.</p> <p>The viewing corridors are based on the Harrow Views Assessment (2012) which followed the recognised methodology of the London View Management Framework. By definition all views are dynamic and will change over time; however the protection of identified views in accordance with the Framework will <i>de facto</i> ensure that many existing non-protected views and glimpses of the Hill are retained. Therefore <b>no change</b>.</p> <p>This view was considered in the Views Assessment but was found not to meet the London View Management Framework criteria.</p>
36	Fig 5.51	<p>Since production of the Core Strategy, the list of protected views has been updated and a version of the map contained in the Harrow Views Assessment (2011) is included in the AAP (Fig 5.1). In this version the view from Harrow Recreation Ground is wrongly labeled 'Roxborough Rd footbridge' and the views from the footbridge have been omitted.</p> <p>I do hope that having gone to the trouble and expense of producing this new document, it will be taken more seriously than the previous one, when considering the impact of proposed developments.</p>	Incorrect labelling	<b>Noted.</b> The Views Assessment has been amended to correctly annotate Harrow Recreation Ground.
9	Para 5.2.10	Why is note 8 required? It relates to Policy DPD.	Check reference	The footnote is provided to assist the reader in relation to this paragraph. Therefore <b>no change</b> .
24	AAP Policy 8	Area Action Pan Policy AAP8 sets out the emerging approach to	None	<b>Support noted</b> – ongoing engagement welcomed.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>identifying, conserving and managing local views. This policy is informed by the Harrow Views Assessment (2012) and is broadly supported. In developing approaches to support the managed protection of these views the Council should draw from the detailed visual management guidance within the Harrow Views Assessment (2012) and incorporate associated assessment criteria within the Local Development Framework.</p> <p>The GLA understands that whilst the Harrow and Wealdstone Area Action Plan will set out development management policies that are specific to the intensification area, it is intended that this document will also act in conjunction with the Development Management Policies DPD. It is noted that whilst development within the intensification area would be most likely to impact on the views identified, proposed development outside of this area would also, potentially, be subject to protected views. Officers would, therefore, welcome the opportunity for further engagement with the Council as both of these DPDs are developed further, to determine where the relevant assessment criteria will reside, and to ensure the relationship is clear.</p>		

## AAP Policy 9

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Policy AAP9	We support the detailed references to encouraging the use of non potable water, preventing water pollution and preventing sewer flooding as set out in Policy AAP 9: Flood Risk and Sustainable Drainage within the Intensification Area and its supporting text. We would suggest the policy is applied to residential developments over 10+ and that reference is also made London Plan Policy 5.13 Sustainable Drainage.	Apply policy to major residential development and refer to LP policy	The policy applies to Major development proposals, which by definition are proposals for 10 or more residential units. The supporting text has amended to refer to London Plan drainage hierarchy.
24	AAP9 to 12	Area Action Plan policies AAP9 to AAP12 address matters of sustainability within the intensification area, and cover issues of flood risk and sustainable drainage, decentralised energy, provision of open space, and improving access to nature. These policies will supplement the overarching approach of the Harrow Core Strategy, and those in the Development Management	Sustainable Development	Support is noted

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		Policies DPD, and are broadly supported.		
24	AAP Policy 9	Broadly supported, the Council should, however, include a point under part C of this policy which identifies the requirement for development proposals to utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so. London Plan Policy 5.13 provides a drainage hierarchy which the Council may wish to refer to within supporting text to provide further guidance with respect to SUDS.	SUDS	Agreed. Part C of the policy is amended to include the requirement to utilise SUDS and supporting text also amended to refer to London Plan drainage hierarchy.
29	AAP Policy 9	Natural England welcomes the provision of SUD's which can be included within green infrastructure provision.	None	Support is noted, also see amendments above
38	AAP Policy 9	We are generally supportive of this policy but it could be strengthened with the following amendments <b>Point C. a)</b> We suggest you strengthen the wording of this bullet by including the following: <i>“Reduce the surface water run-off rate of the site to Greenfield run-off rates wherever practicable.”</i> <b>Point D.</b> This would be improved by changing the wording to: <i>“In selecting the sustainable measure to be used, preference should be given to those that reduce demand for potable water and which contribute to biodiversity and improving water quality.”</i>	Greenfield run off and water quality	Suggested amendments are agreed and duly made
40	AAP Policy 9	We would like to see more discussion of the rise in flood risk due to the increased amount of hard-standing required for vehicle parking. The policy should address this by promoting car-free development, prioritising garden space over parking space and, where parking space had to be provided, ensuring a suitably permeable surface.	Strengthen policy to reduce surface run off	Policy requires development to reduce the surface water run-off rate of the site to Greenfield run-off rates. To achieve this, new development will have to consider a range of appropriate measures, including utilizing sustainable urban drainage systems, permeable surfaces, green roofs and walls etc. No change
53	5.3	Chapter 5.3 opens a old can of worms. Environmental sustainability. It is very interesting to read the councils thoughts and facts on the flood plain that already have many houses blighted by flooding for many years. This Harrow Council have never admitted publicly that there is a flooding risk in East Wealdstone and the fact that many houses have been built in this area on a flood plain. Your policy AAP 9;E.... states that “Proposals that fail to reduce surface run off, or that would increase the risk of flooding or water pollution will be refused”. In the past Harrow Council have given	Flooding in Wealdstone	To support the Core Strategy and the Area Action Plan, the Council has undertaken a detailed strategic flood risk assessment of the borough, which identifies areas at potential of flood risk. This has identified that parts of Wealdstone are at risk of flooding due to the culverted Wealdstone Brook. Further modelling work was undertaken as part of the AAP work and has involved both Environment Agency and Thames Water input – the latter being responsible for the foul drainage system. While national policy directs new development away

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>planning permission for houses to be built on this marshy area. Victorian maps show the Byron Park and Byron Cemetery as the flood plain for all the surface water from the high ground on Harrow Wealds ridge. But building permission was still given by Harrow Council and this proposal of Intensification will repeat this terrible mistake and blight other people's lives.</p> <p>Chapter 5.3.6 states Fluvial flooding represents only one flood risk in the urban environment... Historically flooding from other sources has been dealt with through the foul and surface water drainage system – a structural engineering problem. However the capacity of the system is now largely exhausted through population growth and increasing impermeability. How long have Harrow borough known this fact but put their heads in the sand? Now you want to further increase the population to further raise flood levels in many houses in North East Wealdstone. More people-more concrete-more flooding. And you call this sensible progressive planning?</p>		<p>from the natural flood plain, in urban areas such as Wealdstone, this approach is not practicable. Existing development in Wealdstone represents significant public and private investment. It's regeneration is a key objective for the AAP and must therefore provide opportunities for redevelopment to enable this. The AAP seeks to ensure that the regeneration of Wealdstone takes account of existing flooding issues and addresses this through higher on-site requirements for new development as well as through provision for strategic flood mitigation measures, such as the proposal for deculverting and flood attenuation at Kenton Recreation Ground. Without new development, the existing flooding issues would not be addressed.</p>
53	5.3.17	<p>Chapter 5.3.17 describes the only possible gleam of hope and common sense in the whole 192 pages of the plan. The deculverting of the Wealdstone Brook in Kenton Park Recreation ground, to provide a flood plain to help relieve the pressure elsewhere in the Borough. You state that this scheme needs to be investigated and its feasibility proven. I understood that the North Brent Integrated Urban Drainage pilot has investigated this avenue and found it a feasible proposition. Do you not have knowledge of this?</p>	Feasibility of deculverting Kenton Rec	<p>The Consultants commissioned to undertake our further detailed modelling and analysis of the flooding issues in Wealdstone are the consultants commissioned to undertake the Brent IUD. The Kenton Recreation Ground was historically a landfill site. While borehole samples have been undertaken of the Kenton Recreation Ground as part of that study, these were not comprehensive enough to understand the types and extent of waste that would require extraction and the remediation works necessary. Hence why further investigation is required.</p>

## AAP Policy 10

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
13	AAP Policy 10	<p>AAP 10 H&amp;W district energy network Good to see this!</p>	District Energy Network	Support is noted
24	AAP Policy 10	<p>Area Acton Plan Policy AAP10 seeks to promote decentralised energy within the intensification area, and whilst the emerging</p>	Conformity with London	GLA support for the promotion of the district heat network for the Heart of Harrow is noted. The suggested

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>direction of travel of this policy is supported, the Council is advised that further refinement is required to ensure general conformity with London Plan Policy 5.6.</p> <p>The key area of concern relates to the definitions of 'small' and 'large' development in Policy AAP10 which do not appear to reflect the London Plan definition of 'major development' in Annex Five.</p> <p>The Council should note that the London Plan defines major development to be ten or more houses, or 1,000 sq.m. for all other uses. The Council must ensure Policy AAP10 is consistent with this approach so as not to inadvertently relax the requirements of London Plan Policy 5.6.</p> <p>Further detailed comments and advice with respect to refinement of Area Action Plan Policy AAP10 is provided within Appendix One. GLA officers would welcome the opportunity to informally review subsequent drafts of this emerging policy in order to provide constructive feedback and reassurance to the Council ahead of the next consultation stage.</p> <p>Notwithstanding the above concern, the Council's intention to promote a district heat network for the intensification area is strongly supported. However, the GLA acknowledges that the scattered distribution of opportunity sites and spatial separation of major heat loads presents constraints to delivering a district heating network across the intensification area as a whole at this point in time.</p>	<p>Plan</p> <p>Define small and large development in line with London Plan</p>	<p>amendments are made to ensure conformity with the London Plan</p>
24	AAP Policy 10	<p>Nevertheless, the Council is strongly encouraged to build on the approach emerging within the supporting text to this policy, and to promote the expansion of combined heat and power systems (where these come forward within development proposals) to reach beyond site boundaries in order to serve adjacent sites and uses in accordance with the principles of London Plan Policy 5.6. This would represent a pragmatic approach to bringing forward a local energy network, and would serve to improve the feasibility of CHP on a site by site basis by providing a greater critical mass of demand.</p>	<p>Promote the expansion of combined heat and power systems</p>	<p>Part C of the policy, and the supporting text, has been amended to consider opportunities on very large schemes for the potential of the on-site energy centre to serve both the needs of the site as well as adjacent sites and uses</p>
24	AAP Policy 10	<p>The definitions of 'small' and 'large' development in Policy AAP10 do not appear to reflect the London Plan definition of 'major development' in Annex Five. The Council should note that the London Plan defines major developments to be ten or more houses, or 1,000 sq.m. for all other uses. The Council must ensure</p>	<p>Define small and large development in line with LP</p>	<p>Amendments have been made to clarify that the policy applies to all new major development proposals.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		Policy AAP10 is consistent with this approach so as not to inadvertently relax the requirements of London Plan Policy 5.6.		
24	AAP Policy 10	<p>Reflecting the London Plan definition of 'major development', this Area Action Plan policy should seek to ensure that all major developments within the intensification area select energy systems in line with the decentralised energy hierarchy in London Plan Policy 5.6. With this in mind the following should apply:</p> <p>All new major development should prioritise connection to existing or planned decentralised energy networks, where feasible. Where this is not feasible at present, development proposals should ensure the design of the development would facilitate connection in future.</p> <p>All new major development should investigate the scope for on-site heat networks linking all buildings on site (prioritising CHP where applicable) and served by a single energy centre.</p> <p>The Council is advised to state in supporting text that details of the energy centre and route of the piping network will be required to demonstrate accordance with the above points. The Council is also strongly encouraged to require major development proposals to examine opportunities to extend CHP systems beyond site boundaries to adjacent sites in accordance with the principles of London Plan Policy 5.6.</p>	<p>Decentralised energy hierarchy</p> <p>Require major developments to examine opportunities to extend CHP systems</p>	<p>The requirement for selecting energy systems in accordance with the London Plan energy hierarchy is already provided in Part B (Now Part D) of the policy. The previous parts of the policy have been amended to take account of the suggested policy amendments. The supporting text has also been amended to specify the requirements for demonstrating the compliance with the Policy</p>
40	AAP Policy 10	We welcome the proposals for district heating networks but would like to see ambitious targets, beyond the statutory minimum, for the energy rating of all new buildings.	Have more ambitious targets	There is no local justification, in terms of a robust evidence base requirement, to set higher targets for the energy rating of buildings beyond that prescribed in regulations.
47	AAP Policy 10	P.55 AAP10. Include additional policy to encourage Photovoltaic panels to be retro fitted on the many (significant) flat roofs of buildings in the IA. (see aerial photo on P.9 for scope of opportunity).	Additional policy re solar panels	Agreed. New policy added but not limited to just photovoltaic panels but in support of retrofitting energy efficiency measures, all appropriate types of renewable energy technologies, as well as opportunities to connect to or install on-site decentralised energy systems
24	5.3.20	With respect to paragraph 5.3.20, the Council should note that use of biomass to generate heat is subject to satisfying air quality standards in line with the Mayor's Air Quality Strategy.	Biomass caveat	A footnote has been added to clarify that the use of biomass to generate heat is subject to satisfying air quality standards in line with the Mayor's Air Quality Strategy

## AAP Policy 11

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 11	Broadly supported in accordance with the principles of London Plan Policy 7.18. With respect to paragraph 5.4.3, the Council is advised to reword the third sentence as follows: <i>“The recommended standard of provision set out in the PPG 17 Study of 4 square metres per child will be sought as a minimum, with an aspiration to achieve the 10 square metre per child provision as identified within the Mayor of London’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’.”</i>	Play space standards	Agreed, amendment to the supporting text is made
28	AAP Policy 11	Open space in Harrow should allow cycling on useful link routes, with widening of paths if necessary, as in Kenton Recreation Ground. These routes should avoid having barriers or gates that force cyclists to dismount. Routes through West Harrow recreation ground (Wilson Gardens to Ridgeway / Welbeck Road) and Harrow recreation ground (Hindes Road to Beresford Road) can be implemented for very little cost.	Cycle routes through open space	Agreed. However this is more to do with proposals for the improvement of existing parks and open spaces, and therefore is more applicable for inclusion in the Infrastructure Delivery Plan. An update of the IDP is currently underway, and therefore the comment has been included in the section on open space as a further consideration in preparing bids and proposals.
29	AAP Policy 11	Natural England welcomes and encourages this policy and is pleased to see Harrow Green Grid.	Open space and Green Grid	Support for the policy is noted
40	AAP Policy 11	We welcome these policies, though feel that special attention needs to be paid to places where a green corridor crosses a busy road in order to ensure that walkers and cyclists can cross safely and conveniently and wildlife casualties are minimised. If, as we hope, a 20 mph limit is imposed, zebra crossings on raised platforms with associated landscaping would suffice in many places. The value of railway lines as wildlife corridors should also be considered.	Road crossings from a green corridor  Railway biodiversity	Support for the policy is noted. Amendments have been made to the text regarding Harrow’s Green Grid to address the concern raised. As previously noted, the 20 mph limit is not supported. The importance of railway land to Harrow’s biodiversity is already acknowledged in the Harrow Biodiversity Action Plan
50	AAP Policy 11	Policy AAP 11 seeks to assess the provision of open space within the Intensification Area. Land Securities acknowledge and welcome the flexibility of Criteria C of this policy which states that “all major residential development will be required to contribute to improvements to the quality and/or carrying capacity of outdoor sports pitches that serve, but <u>may not necessarily be inside the Intensification Area.</u> ”	Criteria C	Support is noted.

## AAP Policy 12



ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 12	Broadly supported, however, the Council are encourage to develop the detail of this policy further, and to draw from the principles identified within the supporting text and Harrow Biodiversity Action Plan (2008), to identify specific objectives for the intensification area within the policy box. With respect to paragraph 5.4.11, the Council are encouraged to refer to <i>“living roofs and walls”</i> rather than <i>“green roofs”</i> as the former covers a wider range of habitats.	Include more detail  Change reference to green roofs	Agreed. Amendments have been made to the policy but in preference to identifying specific objectives to prioritise the achievement of actions outlined within the Harrow Biodiversity Action Plan – which are numerous and therefore provide scope for delivery and achievement on all major development sites, without necessarily limiting this choice through the policy. Amendment made in respect of living roofs and walls.
29	AAP Policy 12	Natural England supports this policy and would recommend the Council give consideration to linking this to increased access to and between existing sites.	Improved access to and between existing SINC	This is part of the principles underpinning the Harrow Green Grid, the delivery of which is referred to through the document.

### AAP Policy 13

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
17	AAP Policy 13	Looking at section 5.5 of the draft AAP (Policy AAP 13 Housing), could I make the following comments: Para C. The reference to 60% 'social' homes should now be 'social / affordable rented' homes - as per proposed amendments to the LP that are out for consultation now. Also - the reference to low-cost market housing. Low Cost Market Housing is not within the PPS3 definition of affordable housing. However, if there is a mechanism in place to recycle the initial subsidy for new affordable housing or if the discount is retained in perpetuity on the property then it is affordable housing. So it's not that clear cut. Perhaps better to delete the reference to LCM housing or reword it so as not to suggest that it is automatically considered as affordable. Para D - maybe delete the bit in brackets .....or it should be 'social / affordable rented or intermediate homes'.	Affordable rent  Remove reference to Low Cost market housing	The reference to the new affordable rent tenure, as part of social housing, has been made. The reference to low cost market housing has been deleted in both Part C & D of the policy
24	AAP Policy 13	The preferred option draft Harrow and Wealdstone Area Action Plan identifies potential for the delivery of 2,800 homes within the Harrow and Wealdstone intensification area up to 2026. This figure is supported by the post examination stage Harrow Core Strategy, for which the Planning Inspector's report has been	Housing target	Support is noted

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		<p>published. The Inspector's report finds the 2,800 home target for the intensification area to be appropriate for the plan period. Whilst officers have noted that this target would exceed the indicative minimum housing capacity of 1,500 homes identified by the London Plan, the GLA has strongly supported the Council's intention to exceed the minimum housing figures for the intensification area. Furthermore, the GLA is satisfied that the Council's target figure is well founded within local capacity, and, supported by the emerging Local Development Framework, represents a sustainable approach for accommodating the housing needs of the intensification area over the plan period. Policy AAP13 of the Area Action Plan sets out the approach to delivering the new homes envisaged for the intensification area, with Policy AAP5 providing supporting guidance on density. The thrust of the housing policies within the Area Action Plan, which would work in conjunction with housing policy within the Harrow Core Strategy and Development Management Policies DPD, is broadly supported in accordance with the London Plan.</p>		
24	AAP 13	<p>With respect to tenure split of affordable housing, Area Action Plan Policy AAP13 promotes a balance of 60 : 40 (social rent/affordable rent : intermediate) for the majority of the intensification area, in accordance with the principles of London Plan Policy 3.11 (and the proposed Early minor alterations to the London Plan [2012]). However, for Wealdstone central the Council is seeking a tenure split that would favour intermediate and low-cost market housing over social rent/affordable rent. Officers understand this approach is intended to respond to local trends in recent years which have seen a high proportion of social rented accommodation delivered within Wealdstone town centre.</p> <p>The Council is advised that this approach would be supported where it would contribute to mixed and balanced communities in accordance with the principles of London Plan Policy 3.9. To this end officers would welcome the opportunity to discuss the proposed approach for Wealdstone central further with the Council, prior to the next stage of consultation, to satisfy themselves that the response would appropriately balance strategic priorities, and local circumstances, over the plan period.</p>	Tenure split in Wealdstone	Further discussion is welcomed
24	AAP Policy 13	The locally identified potential for delivery of 2,800 homes within the Harrow and Wealdstone intensification area over the plan	Housing target	Support for the policy is noted. The suggested amendment to Part B, d of the policy to

ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		<p>period is strongly supported. The explicit promotion of high quality residential stock that should be integrated and 'tenure blind' is particularly welcome With respect to Part B, d. of policy AAP13 the Council is encouraged to include a reference to children's play space.</p> <p>With respect to supporting paragraph 5.5.8, officers strongly support the Council's intention to address the new affordable rent affordable housing product, and to clarify how this should be used to deliver the objectives of the area action plan. Officers would welcome further discussion with respect to refining the content of this paragraph ahead of the next stage of consultation, to clarify the position emerging following the Mayor's recent publication of proposed early minor alterations to the London Plan (2012).</p>	<p>Housing quality</p> <p>Children's play space</p> <p>Continued engagement</p>	<p>include reference to children's play space is also agreed. Further engagement is welcome to ensure the AAP policy remains in general conformity with any emerging policy changes to the London Plan</p>
28	AAP Policy 13	All new flats / houses must provide bicycle parking e.g. secure shed / cage, or alley way for access to back garden	Cycle parking	Cycle parking standards and secure storage facilities are addressed in AAP Policy 19H. It is not necessary to repeat these again within this policy
29	AAP Policy 13	I would refer to our comments above in respect of accessible natural green space standards.	ANGST Standards	Refer to Council response made to the comment in respect chapter 4 and the applicability of ANGST to London, Harrow and the AAP area.
49	AAP Policy 13	<p>The affordable housing split within Central Wealdstone set out in AAP13 would be accepted, whereby there would be a focus on low-cost housing at this location above social rented. Other general policies are not necessarily of relevance to our client, but all seem to be in accordance with strategic London Plan policies and / or those in the Core Strategy</p>	Tenure split in Wealdstone	Support for the departure in the 60:40 affordable housing split for the Central Wealdstone central area is noted, although it should also be noted that reference to low-cost housing has been deleted in response to comments made by Council's own housing department (see first comment and response to this policy provided above).
32	AAP Policy 13	Policy AAP 13 relates to housing and seeks to provide for a range of housing types and sizes, commensurate to the character of the sub area in which it is located. This is further discussed in the reasoned justification paragraph 5.5.2. It is welcomed that the policy recognises site and local circumstances may influence the mix of units that is appropriate within a specific development. This should also be reflected within the requirement for larger schemes to provide a greater proportion of larger sized units, having regard to the specific environment of the site and the requirements (amenity space, parking, privacy) generally sought for larger units, both within the different parts of the Intensification Area and the borough as a whole.	Site and local circumstance	<p>Support for the policy recognition to site circumstances is noted</p> <p>The supporting text at paragraph 5.5.5 is clear that the final mix, in terms of types and size of housing to be provided on individual schemes will be determined through pre-application discussions, having regard to sites specifics and scheme viability. Further, the Harrow CIL currently being prepared to provide top-up funding for the infrastructure required to serve new development within the AAP area, takes account of development viability.</p>



ID	Section / Para	Summary of Comments	Topic /Change	Council Response
		absentee landlords and the most affluent of residents.		
17	5.5.2	We're currently reviewing our target bedsize mix for social / affordable rented units - how can I link this in here? It will be included in the new Affordable Housing Policy and the Housing Strategy - does that provide a workable link? Should these be referenced in 5.5.7? I'd like to link them clearly so that we have a target mix in place to reflect our affordable housing need here in Housing - but making sure it fits in with the objectives in AAP 13.	Affordable rent model	A new paragraph has been added to the supporting text that follows on from the commentary on affordable tenure split and makes reference to the Council Housing Strategy and the requirement therein for a blended rate to ensure affordable housing remains affordable in a Harrow context.
17	5.5.8	5.5.8 should be '60% social / affordable rented' as above. Also the low cost market housing issue as above. Better to say that 'affordable housing' now includes affordable rent rather than saying the 'social' component, as that matches PPS3 etc.	Revise for consistency	Agreed and suggested amendments made
20	5.5.6	We recommend an additional clause is added that this is subject to the proviso that the appropriate amount of affordable housing in a particular scheme depends upon its viability.	Add clause for Viability	The consideration of scheme viability and the mix and amount of affordable housing to be secure on individual sites is already included in the proceeding paragraph

## AAP Policy 14

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 14 (A)	The description of the Wealdstone Strategy Industrial location should be identified earlier than in 5.6.1.	Describe SIL earlier in document	Disagree. While this is a strategic London Plan designation, the Wealdstone SIL only applies to the main Kodak site and the adjoining Waverley Industrial Estate. The preceding chapters deal with the decline in industrial use and demand within Wealdstone, which applies equally to all existing industrial sites regardless of designation
24	AAP Policy 14	<p>The approach presented by Area Action Plan Policy AAP14 promotes a requirement for robust economic analysis to justify consolidation of the Wealdstone SIL, with the burden on a future developer to provide this justification, in support of a comprehensive employment-led redevelopment.</p> <p>The GLA broadly supports the approach of Policy AAP14, in accordance with the principles of London Plan Policy 2.17, as a positive and pragmatic approach to managing change within the Wealdstone preferred industrial location, and promoting the</p>	Consolidation of the Wealdstone SIL	Support is noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		aspirations for the intensification area, following the continued consolidation in the operations of Kodak Ltd.		
24	AAP Policy 14	<p>The approach to consolidation of the Wealdstone preferred industrial location, identified as a strategic industrial location by London Plan Policy 2.17, is supported as a positive and pragmatic approach to managing change in this location following the ongoing consolidation in the operations of Kodak Ltd. At opportunity site 2.</p> <p>With respect to the detail of Policy AAP14, the requirement for robust economic analysis to justify consolidation, and the stated need to ensure accordance with London Plan Policy 2.17 is particularly supported. The cross-reference to detailed site specific guidance in Chapter 6 is also welcomed.</p> <p>Representations on the guidance for opportunity site 2, within Chapter 6, are provided within comment 23 of this appendix.</p>	Consolidation of the Wealdstone SIL	Support is noted
47	AAP Policy 14	P.64 AAP14 item Ah. I may have misunderstood this – could this constraint put the economic development of the location at risk? A more pro-active approach is suggested by way of finding the necessary measures to counteract this? Should the wording be more along the lines of AAP15 item Be?	Traffic impacts	Agreed. Part A(h) of the policy is amended to be more along the lines of Policy AAP15 B(e).
50	AAP Policy 14	<p>Policy AAP14 outlines the criteria by which the Council will assess a proposal for the consolidation of the Wealdstone Strategic Industrial Location. Whilst Land Securities broadly support the principles of this policy we have concerns regarding criteria F of policy AAP 14 and paragraph 5.6.8 in the supporting text.</p> <p>Criteria F of Policy AAP 14 states that <i>“flexibility is included in the latter stages of the proposal to enable further provision in area and/or floorspace in business or industrial use should earlier phases be successful in attracting additional demand.”</i></p> <p>Further to this paragraph 5.6.8, states that <i>“the development of the Kodak site is only likely to be realised through detailed applications of various phased components. It is important that if employment provision in the first phases is successful, that flexibility is retained to modify the latter phases of the masterplan to enable a greater level of employment floorspace to be provided, which may require a greater portion of the SIL to be retained than initially proposed. For this reason, the consolidation of the SIL</i></p>	Requirement to review or revisit the amount of employment floorspace	Given that the Council has now had the opportunity to review the proposed phasing of the development, it is clear that the vast majority of the industrial and business floorspace is to be delivered in the final phase of the development. On the basis that the phasing has largely been agreed, and with limited SIL compliant employment uses provided in earlier phases upon which to benchmark success or further demand, it would seem that the proposed policy requirement for flexibility and review would be frustrated.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p><i>designation boundary will only be confirmed upon the successful completion of each phase of the masterplan.”</i></p> <p>Land Securities do not believe that a requirement to review or revisit the amount of floorspace beyond that set within the approved parameters of an extant and robust planning permission the proposals for which have been assessed under the EIA Regulations would be appropriate nor would they comply with the various statutory provisions. Therefore we request that this is removed from the AAP.</p>		

## AAP Policy 15

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 15	What is the definition of the Business Section in Wealdstone?	Definition	Small and medium sized business and industrial uses with no one, dominant or underpinning specific sector – although the service sector is projected to provide the greatest opportunities for growth.
9	Policy AAP 15 (B)	What about business and industrial sites not identified in Chapter 6? Surely they are equally important and should have a policy.	Non allocated business sites should have a policy	Such sites are provided for in Part C of the Policy
24	AAP Policy 15	<p>Broadly supported as a positive and pragmatic approach to promoting the rejuvenation of local business and employment space within Wealdstone, and contributing to the renewal of the town centre.</p> <p>Whilst the requirement for mixed uses to enable the retention, renewal or intensification of business and employment space is implicit within the policy content and supporting text, for the clarity the Council may wish reword the start of parts B and C of this policy as follows: <i>“Proposals for enabling mixed use development...”</i></p>	Enabling development	Support is noted Recommended changes are agreed and amendments made
33	AAP Policy 15	The MOPC/MPS support Policy AAP 15 which requires applicants for mixed use developments on employment sites to demonstrate that efforts to secure essential community infrastructure not appropriate for town centre locations (e.g.	Community uses explored	Support for the policy is noted. This requirement will be retained

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		police patrol bases, custody centres) have been explored but have not been successful. This is consistent with current planning policies and should therefore be retained.		
55	AAP Policy 15	<p><b>Policy AAP 15: Supporting the Business Sector in Wealdstone</b> states that mixed use development on "... <i>other designated business and industrial land</i> ...", will generally be supported.</p> <p>It is requested that Policy AAP 15 is altered so that it is not so rigid and generalised so that it can take into account site specific issues. This applies particularly to part B, C of the Policy as it is perceived to be unreasonable to require that land and buildings have been, "... <i>vacant for a period of at least 24 months</i>,". This would be highly uneconomical and a waste of land and buildings which could otherwise be in operation and working effectively. Furthermore this would limit the ability of our client to remain within the Borough.</p> <p>A residential-led mixed use scheme on the Site would be in accordance with Policy as it would secure the retention of an existing business and employer in the Borough and would provide a higher standard of design and amenity whilst assisting the Council in reaching their housing targets.</p>	Increase flexibility of policy re 24 month requirement	<p>The policy is intentionally rigid. As set out in the Employment Land Review (ELR) and the Core Strategy, Harrow has a small and finite amount of designated industrial and business use land within the borough in comparison to neighbouring authorities. The vast majority of the industrial and business use land is within the Heart of Harrow area around Wealdstone. The ELR suggests need for such land will continue to diminish, and goes on further to suggest a potential surplus of 8ha over the life of the plan. The consolidation of the Kodak SIL and the allocation of Colart take account of the projected surplus. Therefore, any further release for enabling mixed use development must be robustly justified. Site specific circumstances can be taken into account as a material consideration.</p> <p>The merits or otherwise of a residential-led scheme on this site remain untested. However, the respondent should note the inclusion of the site within the extended boundary of the Teachers Centre site (opportunity site 4). Further discussions with the landowner are required to understand the long-term possibility for this site.</p>
20	5.6.20	We consider that this should be expanded to refer to the type as well as the number of potential jobs. Consequently we recommend that an additional clause is added that proposals should either provide an equivalent employment yield or smaller scale space with flexible terms which is specifically designed to accommodate SME's.	provide equivalent employment yield or smaller scale space with flexible terms	Not agreed. The overall aim of the enabling development argument is to secure job numbers sufficient to meet the AAP jobs target

## AAP Policy 16

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 16 (D)	What does this mean?	Define	Means that proposals for the redevelopment or change of use of offices of less than 1,000 sqm of floorspace



ID	Section / Para	Summary of Comments	Topic / Change	Council Response
				within Harrow town centre will be permitted where the building is no longer fit for purpose, having regard to age, condition, period of vacancy, local market needs etc, and it can be demonstrated that there is a surplus of similar office space in the local market area. It is preferable to reference the Development Management DPD policy than repeat it, and the reasoned justification, again in the AAP.
33	AAP Policy 16	The MOPC/MPS support Policy AAP 16 which recognises emergency services with a public counter (such as police stations) as appropriate uses within Harrow Town Centre. This is consistent with strategic and local planning policies and should be retained within the emerging AAP.	None	Support is noted

### AAP Policy 17

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 17	Where is the Harrow Primary Shopping Area located? What proposal map? What is an allocated site? Da: What is the centre?	Clarification	These various designations, and the extent of each, is shown on the proposals map. The proposals map simply displays the Policies in the Plan as they apply to different sites and locations across the borough.
47	AAP Policy 17	P.71 AAP17 Item C. This concept should be extended to encourage canopies along all retail/other non-residential frontages i.e. existing buildings. In addition in suitable pedestrianised/mixed use areas there should be strategically sighted cross linked canopies where people can stay dry when crossing. There also should be in larger pedestrian areas canopied shelters for sitting and standing. There is a need for increasing canopy cover to take account of increasing amounts of heavy rain and sunshine (high UV – shade provision incl. trees) – this is particularly relevant for children. Link this to AAP7.	Increase requirement for canopies / shelters	Support for the policy is noted. Within pedestrian areas, such as public squares, the Council's preference is for trees to provide shade and cover rather than canopies.

### AAP Policy 18

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
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ID	Section / Para	Summary of Comments	Topic / Change	Council Response
50	AAP Policy 18	<p>Policy AAP 18 outlines the Council's proposed policy in respect of shopping outside Harrow Primary Shopping Area. We have three concerns about the section of Policy AAP17 which reads: '<i>Out of centre development that would impact upon any existing centres and be unsustainable will be refused.</i>'</p> <p>First, it is not clear whether this part of the policy applies to all development, only retail development, or all 'town centre uses' identified in PPS4 (or indeed other specific uses). This needs to be clarified.</p> <p>Second, it is inconsistent with PPS4, which sets out the Government's approach to the assessment of impact. PPS4 states at Policy EC17 that permission should be refused where 'there is <u>clear evidence</u> that the proposal is likely to lead to <u>significant adverse</u> impacts' (emphasis added). In short, for an application to be refused it is not enough for there to be an impact; that impact must be significant and there must be 'clear evidence' to show that there is an impact and what impact that would be. PPS4 places the onus on local authorities to demonstrate this in their decision making. The policy should be revised to reflect this.</p> <p>Third, the term 'unsustainable' is not defined. The term needs to be deleted or defined.</p> <p>Any changes to this policy in light of our comments will need to be reflected in the final sentence of paragraph 5.7.15.</p>	Retail	<p>Agreed, Policies AAP 17 and 18 have both been amended to clarify that AAP 17 deals with the Primary Shopping Area of both Harrow town centre and Wealdstone District Centre &amp; sequentially, directs proposals for major retail development to locate within the Metropolitan centre, and to its core in the first instance. Preference is also given to sites allocated for major retail development in the AAP.</p> <p>AAP 18 has been amended to address appropriate uses, and the management of, secondary frontages, non-allocated town centre parades and neighbourhood parades.</p>

## AAP Policy 19

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Policy AAP 19	I do not believe this has been thought through holistically over the whole of the Intensification Area.	Parking	Concern is noted
24	AAP Policy 19	TfL welcomes this policy which seeks to restrict non-residential car parking to disabled parking provision and operational requirements, and to ensure that the maximum residential parking standards contained in the London Plan are not exceeded. The policy correctly identifies the need to restrict car-use in the area to limit future negative impacts on the highway network given the existing and likely future congestion at local junctions as a result of development. This is consistent with London Plan Policy 6.13.	Mitigating the cumulative impact of development on the public transport networks	<p>Support for the policy is noted.</p> <p>Improvements to the public realm and wayfinding is addressed through Policy AAP7</p> <p>As set out in Chapter 7, the Council intends to adopt a local Community Infrastructure Levy which will fund various projects aimed at mitigating the cumulative impact of development and growth within the Heart of Harrow on the public transport network</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Whilst restricting car use is one mechanism to encourage a modal shift towards more sustainable modes, Policy AAP19 should be strengthened to clarify that developers will be expected to contribute towards mitigating the cumulative impact of developments on the public transport networks, and to improve wayfinding and public realm.</p>		
28	Policy AAP 19	<p>All new road layouts and designs within a site should also conform to (as a minimum) the London Cycle Design Standards, or ideally provide higher quality cycle facilities as per the European guidelines.</p>	London Cycle Design Standards	<p>The requirement has been included in the list of considerations to be addressed through site Transport Assessments</p>
40	AAP Policy 19	<p>Although it starts well with a welcome mention of 'car-free' in the opening paragraph, we believe that this policy is insufficiently radical. The supporting text acknowledges that there is already considerably more use of sustainable modes in the Intensification Area than elsewhere in the Borough. This needs to be built on with rather more urgency and imagination than this paragraph (5.8.2) suggests. We have already indicated in our opening remarks the policies we believe are necessary for an area being developed to this intensity.</p> <p>We would like to see the policy rewritten so that it prioritises access by sustainable modes, with particular emphasis on safe and attractive walking routes to other nearby facilities and to public transport. Safe cycle routes to a rather wider area should also be a priority.</p> <p>As well as 'hard' measures to enable sustainable modes and eliminate unnecessary car use, there is a need for 'soft' measures including individualised travel planning and easily understood information. Before committing themselves to buying or renting a new, intending residents should be made fully aware of restrictions on car use and opportunities for sustainable travel offered by the new development. Community involvement in site-specific travel planning is essential. Car clubs should be encouraged to use electric vehicles. Concessions on public transport fares for those willing to live a car-free lifestyle should also be considered.</p>	<p>More radical policy needed</p> <p>Prioritise access by sustainable transport</p> <p>Increase the information on 'soft' transport measures</p>	<p>Agreed that new major developments within the Heart of Harrow should prioritise access by sustainable modes. The Policy has therefore been amended to include this as the first policy requirement.</p> <p>In terms of the soft measures mentioned, the Policy already requires new development to contribute to the development and implementation of an area wide green travel plan for the Heart of Harrow as proposed by Policy AAP 20.</p>

## AAP Policy 20

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
24	AAP Policy 20	TfL supports the principle of creating an intensification area-wide green travel plan, which will assist in encourage a modal shift towards more sustainable modes in line with London Plan Policy 6.1.	Green Travel Plan	Support is noted
25	AAP Policy 20	Policy AAP 20 refers to an area-wide travel plan, which is very welcome providing it is effectively implemented to help reduce unnecessary car travel. Travel plans are often merely statements of good intent, which developers can circumvent or ignore. The Intensification Area will grind to a halt without an effective and enforceable travel plan.	Green Travel Plan	Support is noted as are the concerns with implementation.
28	AAP Policy 20	There should be plans to implement cycle network and pedestrian improvements even if no funding is immediately available. Commercial development should be asked to fund nearby pre-planned highway improvements. Massive improvements to the cycling infrastructure are required in order to attain high levels of cycle usage as in Holland.	Cycle and pedestrian improvements	Agreed. This is to be included in the Heart of Harrow Green Travel Plan and linked to the Infrastructure Delivery Plan and to further iterations of the Harrow Transport – Local Investment Plan.
40	AAP Policy 20	<p>We believe that it is very important to have an area-wide travel plan in place as soon as possible, so that developers can be aware of any site-specific requirements or constraints this entails and the new off-site infrastructure to which they would be expected to contribute.</p> <p>We welcome the Action Plan's emphasis on enabling pedestrian movement and hope that facilitating walking and cycling will be a central feature of the Travel Plan. However, the need for new public transport routes and infrastructure must also be addressed, including safe and attractive walking routes to public transport facilities. We believe that the highest priorities are step-free access to Harrow-on-the-Hill station and much-improved links between the centre of Wealdstone and the Kodak site. Community involvement in travel planning is essential and Harrow Friends of the Earth are keen to play a part in this, alongside representatives of pedestrians, cyclists and public transport users.</p>	<p>Green Travel Plan</p> <p>Need to include new public transport routes and infrastructure in the plan</p> <p>Community Involvement in the Plan.</p>	A draft Green Travel Plan has already been produced. TfL is working with the Council to improve the detail contain in this. The specific comments made will be considered in the final drafting of the Green Travel Plan document, which will then be made available for wider comment and input before being adopted.

## AAP Policy 21

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
19	AAP Policy 21	Welcome AAP21's recognition of the limitations of the Forward Drive CAA site.	None	Support is noted
38	AAP Policy 21	We support this policy, in particular section G.	None	Support is noted
40	AAP Policy 21	We support the proposal to improve local facilities, and hope that this will lead to more of Harrow's waste being dealt with locally. We are pleased that the policy contains adequate safeguards for local amenity but believe that care must be taken in the choice of technologies used in order to minimise harmful emissions and maximise the potential for recycling.	None	Support is noted. However, as set out in the Pre-Submission West London Waste Plan consultation document, the allocation of waste sites is technology neutral. This enables proposals for new waste facilities to respond to the particular site circumstances without pre-determination. The Council considers that the policies of the West London Waste Plan and the AAP are sufficient to ensure provision of a suitable and acceptable technology option for the Council depot site. No change

## AAP Policy 22

No representations received to this draft policy

## New Policies Sought

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	New Policy	<p>We support the references to infrastructure within the document but we do recommend that there should be a specific policy or sub text in the Area Action Plan on utility infrastructure, along the following lines:</p> <p><i>'It is essential that developers demonstrate that adequate capacity exists both on and off site to serve development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure, including water and sewerage.</i></p> <p><i>In relation to water and sewerage infrastructure where there is a capacity constraint and no improvements are programmed by the</i></p>	Insert new policy on utility infrastructure as stated	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<i>water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development. Water and waste water infrastructure is essential to any development. Where upgrades to the infrastructure are identified to serve new development it is essential that these are in place ahead of occupation, if sewer flooding to property and no/low water pressures are to be avoided.'</i>		

## Chapter 6 Sub Area and Site Specific Guidance

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
29	Chapter 6	Schemes and initiatives that promote green infrastructure, green grid and biodiversity opportunities are welcomed and to be supported. In respect of specific site allocations and uses, Natural England will comment on the schemes/sites as they are brought forward.	Green infrastructure	Support for green infrastructure and Harrow's Green Grid is welcomed and noted

## Sub Area: Wealdstone West

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Wealdstone West	There are old fashioned industrial sites in this area yet there is no guidance on their future potential.	Industrial Sites guidance	The industrial sites specifically identified in the AAP are those certain to come forward for development over the life of the plan, due to the sites being currently vacant or proposed to be (such as Kodak). With respect to guidance on the future potential of other industrial sites not specifically identified, this is provided by Policy AAP 15. No change
26	6.2.3	The Governing Body is very concerned about an increase in traffic immediately opposite the school entrance and the effects this could have on the safety of children accessing the school premises. Traffic turning in and out of the site could become a hazard to children crossing the road.	Traffic near school	The illustration and text have been amended to clearly show that access through the Colart site to Whitefriars Avenue is for pedestrian and cyclists only, not vehicles.
29	Wealdstone	Reconnection of town centres and the potential to provide access	Green Grid	Support for the Green Grid is noted. This is covered in

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	West	to the Green Belt is welcomed and to be encouraged and could be assisted in delivery by building on the Green Grid network. New development can provide new links between existing green spaces and new developments to improve access, environmental quality and identity. Green Chains/links can also be used as opportunities to promote walking and cycling initiatives. Improvements to the existing green infrastructure network are welcomed and encouraged.	improvements	Policy AAP 11 which includes a Green Grid network map, highlighting the opportunities present in the Heart of Harrow for providing new links. No change
30	Section 6	Wealdstone West and Wealdstone Central are relatively low-lying as viewed from the Harrow Weald Ridge and there may well be the opportunity for some tall buildings on the Kodak site and the centre of Wealdstone that do not impinge on the historic views of the Hill and far enough away from Headstone Manor not to affect it's setting. A tall, mixed use, island site in Wealdstone, of exceptional design, could be a beacon for future investment in the District Centre.	Potential for taller buildings	The Council agrees that the main Kodak site would lend itself to taller buildings, especially the central portion of the site where the current Kodak factory is located, and is itself a big structure in height and bulk. However, in discussions with the developers of the site, Land Securities, they indicated early in our pre-application discussions that they did not want to pursue tall buildings on the site. The reason given was that they want development on the site to integrate with the surrounding dominant suburban character, given the significant residential element of the proposed scheme. The Council therefore supports this view. No change
30	Section 6	A concern with the Kodak/Zoom site residential development is that it appears to be 'creeping' closer to Headstone Manor. Given its historic and Listed status Headstone Manor must not be compromised by the deterioration of its rural setting by residential encroachment.	Setting of Headstone Manor	The Council has considered this issue in the context of the outline planning application made by the developer and is satisfied that the open space to be retained on the Zoom Leisure site provides an appropriate buffer and maintains the setting of the Listed Headstone Manor complex. No change
30	Section 6	There is a concern about the loss of playing fields due to the Kodak/Zoom development. Currently local youth football clubs hire out the Zoom pitches but there is no indication where additional pitches are to be located for these clubs once the redevelopment works commence. A new school is also proposed for the Kodak site but there is not a great amount of space, if any, allocated for the recreation of the children.	Loss of playing pitches and reprovion  School playing fields for new Kodak primary school	The proposal sees the existing open space reconfigured to provide a new green link running through both sites, linking Headstone Manor to Wealdstone town centre. While this will result in the loss of playing pitches, compensation will be sought to improve the quality and number of playing pitches Headstone Manor recreation ground and at the Bannisters Sports Grounds. The section on site specific infrastructure has been amended to reflect this requirement. The Council understands that the proposal for the new school includes a formalised play area for the children.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
40	6.2 Wealdstone West Sub area	We are very concerned about the barrier to sustainable travel in this sub-area caused by the railway line. This is not only a problem for the Kodak site. It also has serious implications for the redevelopment of, for example, the Teacher Centre site. A new foot and cycle bridge between these two sites should be an urgent priority in the travel plan. We strongly believe it needs to be in operation before any new secondary school in the area is allowed to open.	New connection across the railway to Kodak site	The AAP retains the proposal for bridge/underpass providing a new pedestrian and cycle connection across the railway line to connect the Kodak site with the proposal for a new secondary school on the Teachers Centre site. While evidence show that delivery of this enhanced connection is not currently viable as part of the Kodak development, the Council considers the potential for possible delivery should be retained should this prove viable at some time in the future.
40	6.2 Wealdstone West Sub area	We are generally happy with what the Action Plan proposes for the Kodak site, though we are very concerned by two aspects of the current planning application that are at variance with the Council's aspirations. We strongly support the principle that any A1 use of part of the site should have a 'supporting' rather than 'leading' role and be confined to 'small scale retail' only. And we much prefer the Action Plan's location of the primary school to that in the outline application, which we believe would lead to insoluble traffic problems at the beginning and end of the school day as well as a sub-standard environment for education.	Retail to be a supporting use on Kodak  Location of new primary school	The applicants for the development of the Kodak site have submitted evidence, which has been independently verified, that shows the proposed supermarket will not have a significant impact on local retail shops. However, these reports did conclude that the risk to small shops nearby would be from the application's inclusion of additional small shops, and subsequently the quantum of the floorspace to be provided for small retail units has been halved.  The Council's education department has confirmed that the Land Securities proposed location for the new primary school is suitable and preferable in a catchment context.  No change
40	6.2 Wealdstone West Sub area	The Council should not allow any use on this site which would be a major traffic generator. Parking should be minimised and most, if not all, of the housing should be car-free. On-site green space should be maximised. No through traffic (other than buses using transponder-operated gates) should be allowed and no road should be allowed to sever the 'green route' to the east of Harrow View. We oppose the plan to replace traffic lights by a roundabout at the Harrow View / Headstone Drive junction as this can only lead to increased inconvenience and danger for pedestrians and cyclists. New bus routes that can make use of double-deckers are badly needed. We hope that these can run through the site (and possibly even cross the new bridge, though it should be closed to other motorised traffic). We hope that the scope for buses to use the Princes Drive corridor to access the Station avoiding the low bridge will be investigated.	Parking  Object to roundabout  Potential for new bus routes	The objective of the Kodak Opportunity Site is to provide a significant quantum of new industrial and business floorspace consistent with its strategic industrial location designation. Parking and permeability through the site is required to support this new employment floorspace. Although public transport enhancements are to be delivered, these will not result in public accessibility levels sufficient across the site to support the provision of car-free housing  Transport for London has modelled the traffic impact of the proposed development and is working with the Council and the developers to determine suitable mitigation measures to be put in place to manage traffic impacts of the development and possible bus routing to serve the site.  The proposal for a new bridge over the railway corridor



ID	Section / Para	Summary of Comments	Topic / Change	Council Response
				is for a foot bridge, although an underpass option may prove more accessible for cyclists, mothers with prams etc. Nevertheless, neither option is intended to accommodate vehicles of any kind. No change
40	Wealdstone West Sub Area	Whether or not the school is built, cycling facilities in the area will need major improvement, especially between Harrow Weald and the proposed bridge. The school would necessitate a new bus service using Tudor Road, even if initially buses can only travel south from there. If no route suitable for buses can be found through the residential roads to the north then consideration should be given to adapting the proposed bridge to take buses, building a busway alongside the railway or even providing a new Overground station to serve both the school and the Kodak site.	Bus services for the new secondary school, and improved cycle facilities	Enhanced cycling facilities form part of the Green Travel Plan for the Heart of Harrow. TfL have modelled the impacts of a Secondary School on the Teachers Centre site, the mitigation will need to respond to the final school proposal for the site, and being a free school, this remains unknown at this time. Further consultation with the community is proposed to take place prior to an application coming forward for a new school on the site. The Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. Changes have been made to the site allocation text for the site to reflect this.
50	Sub area Wealdstone West	The Council have identified seven sub-areas which make up the Harrow and Wealdstone Intensification Area. Sub-area Wealdstone West includes Harrow View. Land Securities support the key objectives for the sub-area which seek to deliver new homes and jobs, create a green route through the Kodak site, and create new public open space and public realm improvements. The current proposals for Harrow View embrace these objectives and seek to deliver in every aspect.	Sub area objectives	Support is noted

### Site 01: Headstone Manor

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
38	6.2.4	We support the objective to promote opportunities for flood attenuation in this area. <b>Design considerations</b> There is an ordinary watercourse which runs along the eastern	Flood attenuation	Support is noted and the amendments suggested have been made

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		boundary of this site. This should be included in the design considerations and opportunities to enhance, de-culvert (if required) the ordinary watercourse should be sought.		
54	6.2.4	<p>Headstone Manor and its range of heritage assets are provided an appropriate setting based on the significance of the heritage assets. This is achieved through thorough analysis of all the heritage assets, their significance and the contribution the setting makes to their significance. This includes assessing the assets individually and collectively. This approach is line with Planning Policy Statement 5: Planning for the Historic Environment (PPS5) (2010) and English Heritage's <i>The Setting of Heritage Assets</i> guidance (2011).</p> <p>It is noted that the sub-area site specific guidance (i.e. Site 01: Headstone Manor and environs, and Site 02: Kodak and Zoom Leisure) seeks to address these issues. However the details provided in this part of the AAP are not sufficiently robust to conserve the significance of the Headstone Manor complex and its various settings. For example the illustrations, supported by the text, promote development on land east of the Headstone Manor complex. It is noted that a viewing corridor is proposed, but we are still concerned that the significance of the Headstone Manor complex, as provided by its setting, would be harmed by the proximity and form of the development proposed.</p>	Significance of the heritage asset	The Council has concluded, in its response to the current Kodak planning application, that the development on the Zoom Leisure sites represents an encroachment however the retention of a portion of the existing open space will provide a buffer to Headstone Manor, coupled with building heights of two to three storeys in scale, will ensure an acceptable relationship is maintained. Careful scrutiny of building materials and landscaping of the open space are required through reserve matters.

## Site 2: Kodak and Zoom Leisure

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
4	Site 2 Kodak and Zoom Leisure	<p>Please will you consider what can be done to ease the traffic congestion in Harrow View and Courtney Avenue while the building is taking place on the Kodak and Zoom leisure sites. As you are already aware, during certain times of the day these roads are extremely busy.</p> <p>Anything that brings decent living accommodation, long term employment, good leisure facilities, youth centres and a general sense of well being for those living or working on this site is to be welcomed.</p>	Traffic congestion	<p>Transport for London has modelled the traffic impact of the proposed development and is working with the Council and the developers to determine suitable mitigation measures to be put in place to manage traffic impacts of the development. This includes traffic impacts to and from the site during the construction and operation phases.</p> <p>No change</p>
6	Site 2	The Kodak site development has some very good aspects such as	Traffic	Transport for London has modelled the traffic impact of

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		the Green pathway and development of ground around Headstone Manor. The issue which has to be addressed will be the large increase in traffic at the Harrow View/Headstone Drive crossroads and the inevitable increase in traffic on Victor, Sydney, Albert, Edward Roads which are already used as rat runs to cut out the lights at the crossroads.	congestion	the proposed development and is working with the Council and the developers to determine suitable mitigation measures to be put in place to manage traffic impacts of the development.
6	Site 2	I regret to see from the tree report that the Lombardy Poplars on the north western boundary of Harrow View West and at the far end of Edward Road will be removed. I would hope that the loss of so many trees will be more than made up for by the planting of many more mature trees elsewhere in the development.	Loss of trees	89 of the 241 trees on the site are to be felled, many of which are subject to a 'group' tree preservation order. A detailed landscaping strategy will prepared by the developer, and the Council will seek to ensure this make provision for both the loss of existing mature trees alongside significant new provision across the site.
6	Site 2	Kodak Chimney. None of the local people I have met at the various consultations I attended liked the chimney: in fact everyone I have spoken to think it an eyesore. Surely the chimney will be incongruous within the new development and should be removed.	Objection to keeping the chimney	The Council understands that views are split on whether the chimney should be retained or not in the new development. The Council is inclined to agree with the applicant that the chimney is a well known landmark and, although of little heritage value, provides a useful orientation tool within the borough. If the new character to be provided by development on the site is to somehow reflect the site's historic industrial use, then the retention of the chimney may aid this.
6	Site 2	It will be important to ensure that the area designated the Headstone Manor Recreation Ground and owned by Harrow Council will remain as an area of open green space for sport and recreation. There is a danger that this green area could in the future be taken over for more housing. To do this would ruin the well developed plan for recreation in this area which has designated Headstone Manor Recreation Ground as a green area.	Retention of open space	The Harrow Core Strategy includes Policy CS1 F which protects open spaces and ensures there is to be no net loss of land in existing open space. Provision is however made to reconfigure open space where this promotes improvements to quality and access but no reduction in area. This Policy would prevent any loss of the open space on the Headstone Manor Recreation Ground to development. The proposal for opportunity site 2 provides for the reconfiguration of the same quantum of the existing open space on the Zoom Leisure site to be redistributed across the main Kodak site to provide a new green corridor linking Wealdstone with Headstone Manor.
6	Site 2	The plan shows a large retail outlet which is proposed as a supermarket. Although the creation of many new homes in the development will inevitably create a demand for food, it will also be important to ensure that this element in the development does not take business away from the many small businesses nearby. I	Retail impact	The applicants for the development of the Kodak site have submitted evidence, which has been independently verified, that shows the proposed supermarket will not have a significant impact on local retail shops. However, these reports did conclude that the risk to small shops

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		would be especially concerned for the survival of the excellent small shops near the Quadrant, especially : Headstone News, 217 Harrow View; J Healy Greengrocer, 3 Headstone Drive; J A O'Toole Butcher, 216 Harrow View; Desons Pharmacy, 205 Harrow View; Londis Headstone Drive.		nearby would be from the application's inclusion of additional small shops, and subsequently the quantum of the floorspace to be provided for small retail units has been halved.
10	Site 2	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change
12	Site 2	I like the plans for the Kodak site – Land Securities seem to have listened to what people want to see – good mix of housing, small businesses, green space. Not sure about a "free school" – if the government changes, will this be out of fashion and then we are left with a shortage of secondary school places.	Concern over the long term future of Free Schools	Support for the Land Securities proposal is noted. Given the stage the application has reached, and the comprehensive nature of the evidence produced in support of the planning application, the AAP has been changed to more closely reflect the Land Securities proposal in terms of uses, quantum and layout. The AAP makes provision for a new secondary school, serving the Heart of Harrow, on the Teacher's Centre site in Wealdstone. No change
13	Fig 6.8 Kodak Site	I do prefer the proposed school to be west of Harrow View as shown here, rather than within the main Kodak site as proposed by Land Securities. Does the "education" rectangle in fig 6.8 allow for space for playground and playing field? If not, remove the touching residential block to the west and allot the space to the school	Kodak primary school	The Council's education department has confirmed that the Land Securities proposed location for the new primary school is suitable and preferable in a catchment context. The Council understands that the proposal for the new school includes a formalised play area for the children. No change
13	Kodak Site	ref design considerations – second one on page 96	New	Agreed. The text has been amended to include the

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>We do need a new means of crossing the railway, as indicated by the dotted "key route" lines in figs. 6.8 and 6.13, to link the Kodak site and the Teachers Centre area (Heart of Wealdstone).</p> <p>However a conventional footbridge like existing ones is not the answer - they are very unfriendly and off putting, being steep and awkward, and no use at all to major user groups such as people with prams, shopping trolleys, mobility scooters and cycles. I suggest re-write this one as follows:</p> <p>"- consider and allow for provision of future pedestrian and cycle way across the railway corridor, considering both bridge and underpass options".</p> <p>An underpass may well be more costly, but probably far more beneficial. Think of mums and grannies.</p>	connection across the railway	option of both a pedestrian bridge or underpass
19	Kodak Site	<p>Paras 2.5.12 &amp; 3.6.2 - agree that development on the Kodak site will have a serious effect on traffic. It was a very short-sighted decision to allow development of the Goodwill to All site to take place separately from the larger site behind it piece-meal development which will also prevent the action para 3.6.2 describes of improving the capacity of the road junction, and delay the improved bus service which 2.5.12 describes.</p>	Traffic congestion	<p>Transport for London has modelled the traffic impact of the proposed development and is working with the Council and the developers to determine suitable mitigation measures to be put in place to manage traffic impacts of the development.</p> <p>No change</p>
24	Site 2: Kodak	<p>The key site objectives for this strategic site are strongly supported, as is the Council's intention to promote a comprehensive employment-led regeneration of the site that would also deliver wider aspirations for the intensification area.</p> <p>Whilst it is acknowledged that eventual consolidation would be driven by robust economic evidence, the GLA is satisfied that figure 6.8 represents a pragmatic, evidence based, approach to comprehensive redevelopment of this site, and one which would support the key objectives of the intensification area.</p> <p>Nevertheless, officers would welcome further engagement with the Council, before the next stage of consultation, to determine the likely scale of SIL consolidation in land area terms, and to consider whether the remodelled parcel of employment land would merit the retention of strategic identification within the London Plan.</p>	Site objectives	Support noted. Further engagement welcomed.
24	Consolidation of SIL	<p>Area Action Plan Policy AAP14, supported by site specific guidance for opportunity site 2, represents the preferred approach to consolidation at the Wealdstone SIL. This has been developed with strategic guidance to respond to the local and sub-regional employment context, and follows the Council's statement of intent</p>	Consolidation of SIL	<p>The Council notes that, in the context of the Wealdstone SIL, the GLA are satisfied that the approach taken to consolidation is sound.</p>





ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		suggests that the Council's primary objective is securing a minimum of 1,230 jobs and that the 1,035 homes are the catalyst for achieving this. Accordingly, we consider that the number of new homes should not be stated as a minimum but rather as a 'target' and suggest that this should be reworded to state <i>"development should seek to achieve 1,035 new homes."</i> Furthermore, it should be clarified that Use Classes C2 and C3 will count towards the homes output number.	Use classes C2 and C3 to count towards housing output	
50	Site 02; Kodak	Section 6 of the draft AAP states that Site 02 could include small scale retail (A1 use), financial and professional services (A2 use) and restaurants and cafes (A3 use) as supporting land uses to the lead land use of employment on the site. We consider that it would be acceptable to widen this further and include public houses (A4 use) and hot food takeaways (A5 use) this reflects the range of uses which local residents and employees will expect to find within a short distance of their home or workplace not just within the town centre.	Widen the scope of uses to include A4 and A5	Agreed. The description of supporting land uses has been amended to provide for Use Classes A4 & A5
50	Site 02; Kodak	In terms of the delivery of Site 02 the draft AAP states that <i>"phasing of development to be linked to staged re-appraisal to secure the maximum employment floorspace."</i> As outlined earlier in section 5 of our representations in respect of paragraph 5.6.8, Land Securities do not believe that it is an appropriate requirement to review or revisit the amount of floorspace beyond that set within the approved parameters of an extant planning permission. Again we request that this is removed from the AAP.	Phasing	Agreed. This has been removed.
54	Site 02	On considering the Kodak site, we would also encourage the sub area site specific guidance to consider the industrial heritage of the site and encourage the retention and enhancement of positive elements as part the site's regeneration. This approach would accord with London Plan policy 7.9.	Reflecting industrial heritage	Agreed. The design considerations have been amended to give consideration to how the establishment of a new urban form and character for the site might reflect or incorporate elements of its industrial past.

### Site 03: Teachers Centre

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
3	Site 03 Teachers' Centre	Teachers Centre - I oppose this site being used a school this will result in loss of amenity of my constituents by creating extra traffic congestion. The area is already severely affected by anti-social	Traffic congestion / Parking	The site has a long history of education use, and therefore remains the Council's preferred option for a new secondary school. Further changes have been



ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		behaviour from the existing High Schools in the area. The area already lies within a CPZ any therefore any development of a school will add to the already recognised problems in the area.		made to extend the boundary of site to take in the builder's yard on Cecil Road, the Whitefriars Industrial Estate and Aerospace House. The designation will provide for continued industrial use of these sites as well as for further education use, enabling the consideration of a much larger parcel of land to provide further options to accommodate a new school more comfortably on the site. It will also enable wider options to be considered to mitigate the traffic impacts arising from any school proposal. While TfL have modelled these impacts, the mitigation will need to respond to the final school proposal for the site, and being a free school, this remains unknown at this time. Further consultation with the community will therefore need to take place prior to application coming forward for a new school on the site. The Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. Amendments are made to the AAP to reflect these requirements.
10	Site 3: Teachers Training Centre	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change
13	Teachers Centre	ref design considerations [page 99] – penultimate one Provide pedestrian and cycle link across site...	Cycle link	Amended to include cycle link as well. While evidence show that delivery of this enhanced connection is not

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	6.2.6	The same points apply to a railway crossing as above [see 8]. Rewrite this last design consideration: "New development should provide for an accessible and inviting relationship with a pedestrian and cycle underpass or bridge across the railway..."		currently viable as part of the Kodak development, the Council considers the potential for possible delivery should be retained should this prove viable at some time in the future.
26	Site: Kodak and Teachers Centre	<p><b><i>'New 3 form entry Primary school on Kodak Site'</i></b>  <b><i>'Delivery of site suitable for Free school on Teachers' Centre site'</i></b></p> <p>The authors of this consultation document have not considered the implications these two statements could have for the future of Whitefriars Community School. The bald suggestion of a 'new school', with no accompanying explanation, coupled with the statement which follows it, creates the immediate impression that Whitefriars Community School would no longer be occupying its current site. Such implications create anxiety in a school community. The Governing Body seeks public assurances that there is no intention of closing the school.</p>	Whitefriars School Status	The AAP text for this site allocation has been amended to clarify that the Whitefriars Community School is to be remain on the site and be integrated with the proposal for a new secondary school.
26	Site 03: Teachers Centre	<p>Figure 6.13 makes it clear to the Governing Body that the authors of the consultation document have no first hand knowledge of the site.</p> <p>It is incredible to suggest not one but two 'key routes through the site' which traverse the school playground, passing between school buildings and across a playground without any thought to child protection and security issues. Neither of these key routes could be created as illustrated. Currently there is an access 'dogleg' path from Whitefriars Avenue to the Teachers' Centre car park which runs between the houses in Whitefriars Avenue and alongside the school playground. This could be used as it is securely fenced off from the playground.</p> <p>The other proposed 'key route', running along the edge of the school field would be impossible to create without access through the school's overcrowded staff car park. It would have to be fenced off from the school field where an existing tree line would be difficult to avoid.</p>	Pedestrian and cycle routes	The site allocation illustration has been amended to remove the key route running through the middle of the site. The key route running along the southern boundary remains but will be subject to further investigation as part of the development for the secondary school.
26	Site: Teachers Centre /	The illustrated location of 'Education' on Figure 6.13 occupies a large area of Whitefriars Community School's field. This is not part	Open Space status	The AAP text for this site allocation has been amended to clarify that there is to be no loss in playing fields and

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	Whitefriars	of the Teachers' Centre, nor accessible to Teachers' Centre users without the permission of Whitefriars' Headteacher. The field is regularly used for a range of outdoor activities by pupils as part of the curriculum. The school is considering the creation of a wild life area there (next to Tudor Road). If it is intended to put new build on that part of the site, the Governing Body would wish to be informed so that valuable school finances are not wasted on a development which would have little prospect for future use by the school.		that the open space to the north of the current Teachers Centre car park is to be incorporated into the site to provide a much larger and more functional area. The inclusion of the Industrial land fronting Tudor Road offers an alternative access to the site and therefore alternatives for the layout and location of the secondary school on the site. Further consultation with the community and the School will take place prior to application coming forward for a new school on the site, enabling the consideration of the best location of the proposed secondary school buildings.
26	Site: Teachers Centre / Whitefriars	<p><b>Site constraints / dependencies &amp; Design considerations: 'Shared use of sports hall with Whitefriars primary school'</b></p> <p><b>'Need to accommodate a shared use sports hall in event that Primary School is not relocated/incorporated into site'</b></p> <p>The use of the sports hall is shared with the Teachers' Centre, but no mention is made of the school assembly hall which also has shared use with the Teachers' Centre. The Governing Body has a responsibility to ensure that the school provides a full and balanced curriculum for its pupils. Without provision of alternative accommodation Whitefriars Community School would not be able to do this.</p> <p>'...in event that Primary School is not relocated/incorporated into site' carries the strong implication that Whitefriars Community School could, as a result of these plans, no longer exist. The Governing Body would, again, seek immediate assurances that there is no intention of ceasing the provision of primary education at Whitefriars.</p>	<p>Loss of facilities</p> <p>Loss of Whitefriars School</p>	<p>The AAP text for this site allocation has been amended to clarify that the proposals for the secondary school on the site must provide for the reprovision of the current shared hall and gym, if these are not to be retained, having regard to the need for shared use of such facilities between the schools.</p> <p>The reference to any potential relocation of the Whitefriars Community School, either within or off-site, has been removed.</p>
26	Site: Whitefriars School	<p><b>Site Specific infrastructure: 'Potential need to relocate primary school depending on site response'</b></p> <p>Without any indication of the intention behind this statement there is, once again, an implication that Whitefriars may cease to exist in its current position. This again creates uncertainty for the stakeholders at the school and in the local community. The Governing Body seeks clarification of this statement.</p>	Loss of Whitefriars School	The reference to any potential relocation of the Whitefriars Community School, either within or off-site, has been removed.
26	Site: Teachers	<b>Delivery: 'Council to work with community and education'</b>	Free School	The Council is the landowner of the Teachers Centre site

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	Centre	<p><b><i>partners to support and bring forward a Free School application proposal on this site'</i></b></p> <p>It would appear that the authors of this consultation have little understanding of how a Free School is set up and its governance. Free Schools are not within the Local Authority's (LA) jurisdiction. These proposals suggest the introduction of a Free School that could be combined with the existing LA maintained Whitefriars School using shared facilities. The Governing Body do not think the shared facilities as they exist now would be sufficient for both schools.</p> <p>The Governing Body of Whitefriars Community School submits this response to the Heart of Harrow consultation document with a request that the serious implications for the future of Whitefriars Community School be addressed in an immediate response that can reassure governors and other stakeholders. We expect any further development of plans for the site are referred to the Governing Body for comment and response before they are made public.</p>	Status and the implications for shared facilities	and therefore will be involved in any negotiations over the provision of a Free School application on this site, including the need for and use of shared facilities
40	6.2.6	We are very worried about the proposal for a large secondary school on the Teachers Centre site. It is some way from public transport and the nearest point on a main road is one that already suffers from traffic congestion and bus overcrowding problems due to its proximity to Whitefriars Primary School, Salvatorian College and Sacred Heart Language College. We question whether this is a suitable site for a new school at all, especially because it seems Whitefriars may have to be closed to accommodate it.	Suitability of site for a school / transport congestion	See response to ID3 above
Anon 1	Site 03: Teachers' Centre	Oppose the new school on the Teachers' Centre. Loss of local amenity and too much traffic.	Amenity and traffic	See response to ID3 above

#### Site 04: Col Art

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
3	Site 04 ColArt	ColArt Site - I oppose using this site for housing as the area is suffering from higher than average unemployment and the employment use must be retained. This will again lead to loss	Retain in employment use.	The Employment Land Review highlights the lack of demand for industrial uses in the borough, especially large industrial units. The key consideration for this site

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		amenity to my residents from extra traffic and air quality.		is in securing new jobs equivalent in number to that achieved when Colart were in operation. Enabling residential development will be required to deliver new employment space and community use, and therefore the allocation of the site for employment-led mixed use development has not changed.
10	Site 4: Col Art	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change
21	Site: Col Art	The Design Considerations in the preferred option refer to the following: "Cluster community uses and key public spaces in and around the Winsor and Newton building, including those adjacent to the site ownership boundary." I would urge the council to bear in mind the submission that has been made to the DfE in relation to the Government's Priority School Building Programme [PSBP] and how a successful outcome to that process might influence decisions on the future use and development of the Winsor and Newton Site. The DfE has yet to make a decision with regard to the PSBP; however all major players with an interest in the successful development and economic regeneration of Wealdstone should enhance the educational provision for the entire community in the locality not just in terms of 11 - 18 education but in terms of enabling the broadest access by the community [especially those who are from ethnic minorities and those who are suffering economic	Regard should be had to the PSBP school building programme submission	Agreed. The AAP has been amended to accommodate the potential expansion of the Salvatorian School but subject to the College providing the robust evidence of need and their ability to purchase the land (i.e. in the circumstances where PSBP funding is not made available).

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>disadvantage] to innovative programmes which will equip them with the skills and education necessary to develop enterprise and innovation locally: and to use Salvatorian College as an established educational hub.</p> <p>Although it is important to provide new homes in the area it is also necessary to provide the infrastructure which will support economic regeneration within the locality and across the borough generally. Innovative programmes based at Salvatorian could be linked to borough wide business initiatives in partnership. Developing a more solid and broader commercial base in the borough involving such things as innovative IT applications which could help to make a significant transformation to prosperity within the borough. More economically active residents within the borough would mean less demand for council social services and more in the way of tax receipts to fund key projects for the betterment of the whole community.</p> <p>I would urge the council to look carefully at incorporating the development of facilities at Salvatorian College within the overall scheme.</p>	<p>Make provision for expansion of Salvatorian College</p>	
23	Site 04: Col Art	<p>I write as the parish priest of St Joseph's Catholic Church Wealdstone and as the Chair of Trustees of the Salvatorian College.</p> <p>The existing Salvatorian College buildings are in a very poor state and the extremely small footprint of the site is inadequate for the present pupil numbers. Expansion within the existing grounds of the College is therefore practically impossible.</p> <p>All the Catholic primary schools in Harrow are heavily oversubscribed and there is a clear need for a new Catholic primary school.</p> <p>I believe the availability of the Col-Art site represents a once in a lifetime opportunity to improve the provision of the College and gives us an opportunity to build a much needed primary school for the Catholic sector.</p> <p>I would be obliged if in drawing up the plan sufficient space is included for the expansion of the Salvatorian College site.</p>	<p>Make provision for expansion of Salvatorian College</p>	<p>Agreed. The AAP has been amended to accommodate the potential expansion of the Salvatorian School but subject to the College providing the robust evidence of need and their ability to purchase the land (i.e. in the circumstances where PSBP funding is not made available).</p>
42	Site: Col Art	<p>There appears to be some confusion regarding whether the Colart site has access from Wealdstone High Road or High Street. The maps we have, including your Planning Services map, indicate that south of Long Elmes it is High Street.</p>	<p>Clarification</p>	<p>The change between High Street and High Road occurs at Spencer Road, so the site is High Street. This is confirmed by the postal addresses of both Orion House, to the south of the ColArt site entrance, and the petrol</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
				station to the north, being 187 and 190 High Street respectively. While the Catholic Church neighbouring the petrol station but just north of Spencer Road is given as 196 High Road.
43	Fig 6.15 Col Art	The potential site arrangement shown here identifies a pedestrian link to the High Street (just south of Orion House). Whilst this area is within the curtilage of the site, it is designated as a right of way for Orion House and is therefore considered inappropriate to provide a pedestrian link at this point. However creating links to the site via the High Street to north and Bruce Road and Ladysmith Road to the south are realistic.	Pedestrian links	Agreed. The illustration has been amended to reflect this
43	Site: ColArt	Note 3 Design Considerations The land values will not support all of exemplar low/zero carbon (code5/6) housing, the affordable housing requirements and the employment provision requirements.	Viability concern	Agreed. This will be subject to overall scheme viability. The text has been amended to remove this reference
43	Site: Col Art	Note 10 Delivery The business and studio floorspace would be funded by the residential development therefore it is unrealistic to secure these uses before the completion and occupation of the residential development.	Delivery	Agreed. The text has been amended to state that the delivery of the employment and/or community floorspace is to be tied to phasing of the enabling housing
Anon 1	Site 04: ColArt	Oppose housing on ColArt site. This should be for jobs only.	Retain in employment use	The Employment Land Review highlights the lack of demand for industrial uses in the borough, especially large industrial units. The key consideration for this site is in securing new jobs equivalent in number to that achieved when Colart were in operation. Enabling residential development will be required to deliver new employment space and community use, and therefore the allocation of the site for employment-led mixed use development has not changed.

### Sub Area: Wealdstone Central

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
12	Wealdstone Central Sub Area	Colart site – can the Windsor & Newton Museum be a focal point? Like the idea of low carbon housing. Not sure about the multi-storey being demolished for a supermarket especially if it's Tesco – (how about the Co-op) – I	Focal point  Concern	The Winsor and Newton building is to make provision for new employment uses on the site The achievement of the low carbon housing will be subject to viability considerations

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>think it would take business away from the High Street. The High Street could have some better class shops eg women's clothing, a shoe shop, butchers, craft and flower shop. The derelict pubs do need re-developing – low carbon homes? Or green space + play area.</p>	over proposed supermarket	<p>The proposed allocation of the Wealdstone multi-storey car park has been removed due to the emergence of evidence that suggests this is not viable and over concerns of the loss of the parking facility on businesses in the town centre</p> <p>While the AAP can make provision for new retail units it has not control over the quality of the retail occupier</p> <p>The derelict pubs are included in the AAP for redevelopment in Opportunity Site 6 Wealdstone infills.</p>
14	Wealdstone Central Sub Area	<p>POL's Wealdstone CO/OFF falls within the boundary of the Wealdstone Central Sub-area. We note that whilst the site has not been identified for development. It does fall within an area identified for 'new high street public realm'. However, the document does not specify the proposed works as part of the improvements to the public realm.</p> <p>We request that POL is advised of the proposed public realm works, as proposals emerge and are developed, so that they can manage any potential impact these may have on their operations at their Wealdstone CO/OFF site. This will ensure that POL's operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000.</p>	Public realm	<p>The Council or its contractors will notify all parties affected by public realm improvements prior to such works being undertaken, and will seek to ensure appropriate measures are taken minimise any disruption.</p> <p>No Change</p>
29	Wealdstone Central	<p>Improvements to existing public realm through the use of and implementation of Green Infrastructure and soft landscaping are to be encouraged and supported.</p>	Public realm	Support noted.
40	6.3 Wealdstone Central Sub Area	<p>If there is to be a new supermarket in Wealdstone, then we believe it must be centrally located. A location away from the centre, especially one on the other side of the railway, would further threaten the viability of the central shopping area and undermine attempts to establish a more sustainable pattern of travel. The car-park site identified seems to be suitable, provided there is a focus on pedestrian access as part of a safe, attractive east-west walking and cycling route through Wealdstone. We hope also that, by keeping car parking to a minimum and locating it above shops, some new green space can be created on this site, both to add to the attractiveness of the environment and to minimise the risk of flooding.</p>	Supermarket should be located in-centre	<p>Base on the comments received, and the evidence submitted in respect of the Kodak application for a supermarket, which has been independently verified, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP. However this would not restrict proposals from coming forwards but would require it to be considered on its merits against the policies of the AAP and the delivery of the sub area objectives.</p> <p>Support for the removal of the George Gange Way roundabout is noted</p>



ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>We strongly support the removal of the George Gange Way roundabout. We believe this is essential if walking and cycling are to be encouraged.</p>		
49	Wealdstone Central sub area	<p>Our client supports this area-based approach to development throughout the area covered by the AAP, and welcomes that the ideal outputs (houses and jobs) for the Central Wealdstone Sub-Area are ‘minimum’ outputs (Paragraph 6.3.3). It is clear that there are development sites within this sub-area that have the potential to deliver the ambitious, but wholly appropriate targets and to attract the investment that is desperately needed to meet the Core Strategy and AAP objectives.</p> <p>Our client’s is such a site, and it’s inclusion within the broader Opportunity Site 07 is strongly endorsed. Overall, all the site specific objectives for the Sub-Area (set out at Paragraph 6.3.6 are strongly supported. There is clear opportunity for landmark buildings (as encouraged in appropriate locations elsewhere in the AAP and indeed the Core Strategy) addressing the raised roadway at George Gange Way, and these corners should rightly be taken advantage of to provide tall buildings. As such, it is right that the indicative diagram at Figure 6.21 is annotated to show such ‘stepping-up’ in height to address the corners.</p> <p>In respect of our client’s site at the North East corner of the George Gange Way / Palmerston Road crossing, this too should be shown on Figure 6.21 reflecting the other corners, rather than smaller, and on the understanding that this should not necessarily be an absolute limit if it can be shown that a building meeting all planning and amenity considerations could extend higher by 1 or 2 storeys. As such, it is requested that the corners of this junction in the Centre of Site 07 are annotated as potentially 5-10 storeys in height.</p>	<p>Output measures</p> <p>Sub area objectives</p> <p>Building heights</p>	<p>Support for the area based approach and sub area objectives is noted.</p> <p>Minimum have now been amended to be targets, with developers being required to justify significant under or over performance against site targets</p> <p>The Council considers that the building heights proposed for corner plots of George Gange Way and Palmerston Road are appropriate and respond to the local context and policy AAP6. The Council therefore does not support the request for heights of up to 10 storeys in this location and considers that such proposals would fail to meet the revised policy requirements to make a good relationship with the street; to reflect high movement patterns and close proximity to transport facilities, to create the high quality public space within the site itself; or to assist in the legibility of the Heart of Harrow.</p> <p>No change</p>
49	Wealdstone Central Sub area	<p>The statement in respect of flood risk in Central Wealdstone as set out early in the AAP at Paragraph 3.6.3 is supported, which states:</p> <p>“Co-ordinate flood management works and sustainable drainage, to ensure development and regeneration opportunities can be realised”.</p> <p>Our client is strongly encouraged that there appears to be an</p>	Flood risk	Support is noted.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		acceptance by the Local Authority that flood risk should not necessarily be seen as a barrier to development and that the co-ordination of flood related investigations between the Authority and developer(s) can be invaluable in ensuring that development comes forward.		

### Site 05: Wealdstone multi-storey car park

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
6	Site 05 Wealdstone Multi-Storey Car Park	It will be vital to have a new large supermarket with parking provided in Wealdstone Central. This will bring people into the area to shop in other shops nearby who are in need of custom. The area has declined since the Safeway supermarket closed many years ago.	Supermarket provision	Base on the comments received, and the evidence submitted in respect of the Kodak application for a supermarket, which has been independently verified, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP. However this would not restrict proposals from coming forwards but would require it to be considered on its merits against the policies of the AAP and the delivery of the sub area objectives.
10	Site 5: Wealdstone Multi-Storey Car Park	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted
16	Site 5:	It is a bad idea to demolish the multi-storey car park and it would be completely unacceptable unless a similar number of spaces, without massive increases in charges, is to be provided in the new "public car park". Supermarkets normally only provide 2 hours' parking even for customers, so the council would have to ensure that this new supermarket is contractually bound, for a lengthy period, to make their facility available to the general public for much more than 2 hours (although not for long enough to allow commuter parking). The present facility is the only reliable, safe and reasonably-priced place to park in the area and should be left alone. If this is impossible, an equivalent facility must be provided nearby during the construction period. Otherwise, the effect would be devastating for local businesses, charities etc., as well as causing massive inconvenience to motorists.	Parking facilities	Base on the comments received, and the evidence submitted in respect of the Kodak application for a supermarket, which has been independently verified, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP. However this would not restrict proposals from coming forwards but would require it to be considered on its merits against the policies of the AAP and the delivery of the sub area objectives.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
50	Site 05: Wealdstone multi storey car park	<p>Turning away from Harrow View, we are aware of the proposals set out for Site 05 the Wealdstone multi-storey car park which is within the Wealdstone Central sub-area. Given the context of the site specific proposals for this site and the context of their outline planning application, Land Securities would question the deliverability and suitability of the site for retail purposes. As part of the outline planning application we have undertaken a detailed analysis to meet the requirements of PPS4 and this assessment is equally applicable for the consideration of the proposed site allocation.</p> <p>Land Securities has undertaken further analysis of the suitability of the site for a foodstore and associated replacement public car parking facilities but we are aware that the designation is subject to review. If it is intended to pursue the current designation, Land Securities would wish to object on the grounds that the site is not viable, suitable or available and at which time we will make technical analysis available.</p>	Supermarket viability.	Base on the comments received, and the evidence submitted in respect of the Kodak application for a supermarket, which has been independently verified, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP. However this would not restrict proposals from coming forwards but would require it to be considered on its merits against the policies of the AAP and the delivery of the sub area objectives.

## Site 06: Wealdstone Infills

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
6	Site 06 & 07	It is certainly the case that the area around the railway bridge and around the station needs to be improved with better planting.	Urban realm	Support is noted
10	Site 6: Wealdstone Infills	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan."Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”		

### Site 07: Palmerston Road/George Gange Way

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 7: Palmerston Road / George Gange Way	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. “Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a ‘core policy’ it is not necessary to repeat this again in the AAP. No change
28	6.3.6 George Gange Way	Pedestrians and cyclists to be allowed to cross to Canning Road (zebra / cycle crossing). The roundabout (site 07) should be converted to a smaller European-style roundabout with a larger pedestrian and cycle route around it, with humped zebra crossing and cycle crossings across each arm of the roundabout. Alternatively it can be converted to a signalled junction. Segregated cycle paths or cycle lanes (minimum 1.5m wide) should be provided along George Gange Way as far as the High Road (which is probably too narrow for cycle lanes). The uphill ramp can be a shared pedestrian / cycle path to save space (as bicycles will be slow on this section, and it is infrequently used by pedestrians).	Cycle facilities	Proposed improvements being considered include the removal of the roundabout. Further more detailed design work is required to determine the appropriate layout and to incorporate better east – west connections for pedestrians and cyclists.
38	6.3.6	In the site constraints it should be mentioned that there is a culverted watercourse which runs along George Gange Way and	culverted watercourse	Amendments as suggested have been made to the AAP

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		development should be set back from the outer walls of the culvert by a minimum of 8 metres (or 5 metres as it is ordinary watercourse) to ensure the structural integrity of the culvert and future repair/upgrade works can be achieved into the future. This is particularly important with the increased demand on watercourses and culverts as heavier rainfall and more frequent storm events are predicted as a result of climate change.	-buffer area requirement	
49	Site: 37-41 Palmerston Road	Our client is encouraged that further to these representations and separate discussions with the Authority, their site is as a result included within the current Preferred Option as allocated for future redevelopment. As such, they welcome the publication of this latest iteration of the Area Action Plan (AAP) as the mechanism to deliver the much needed significant and appropriate development in the Harrow and Wealdstone area. Accordingly, it will be established that this letter of representation strongly supports the inclusion of 37-41 Palmerston Road as a 'key site' within the Wealdstone Central Sub-Area, as well as comments on behalf of our client in respect of relevant strategic policies proposed within the AAP document.	Site allocation	Support for the site's inclusion as an allocation in the AAP is noted
49	Site: 37-41 Palmerston Road	<p>MP&amp;G Trading welcome this focus on Harrow and Wealdstone and the opportunity to promote their site further through the emerging Intensification Area AAP, in the clear supportive context of the focus on this area within the Core Strategy.</p> <p>Detailed discussions have been held with senior Planning Officers at Harrow Council to discuss the potential development of the site, and the principle of this has been formally agreed. A Location Plan is enclosed detailing the positioning and extent of the site.</p> <p>The owner has assembled a complete consultant team who have been instructed to prepare and submit a detailed Planning Application for the site, confirming that they are committed to delivering this sustainable and highly accessible site.</p> <p>It is considered that the site at 37-41 Palmerston Road responds positively to, and fits within the strategic and local objectives of the Intensification Area, supporting the site's identification as an Key Site in the AAP. It is considered that the site would meet all (AAP and Core Strategy) emerging policy objectives for the following reasons:</p> <ul style="list-style-type: none"> <li>• Is within the indicative boundary of the Intensification</li> </ul>	Site allocation	The Council welcomes further discussion about the contribution that development of the site at 37-41 Palmerston Road can make towards both AAP and sub-area objectives, in terms of jobs outputs and the amount of residential development to enable this, as well as the optimum design and form of development to satisfy the design considerations set out in the AAP.

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Area;</p> <ul style="list-style-type: none"> <li>• Opportunity Site: under-utilised (sub)urban land;</li> <li>• Land and buildings are within sole ownership, and is available and deliverable;</li> <li>• Suitable location for residential development and other commercial / employment uses to deliver a mixed-use scheme;</li> <li>• Potential for a 'landmark' building on this prominent line between Harrow and Wealdstone;</li> <li>• Development potential for up to 90 units of various sizes;</li> <li>• Residential use is an appropriate, complementary and sustainable form of high density development in this established suburban area, in a highly accessible location.</li> </ul>		
49	Site: 37-41 Palmerston Road	<p>It is acknowledged that the site is within an area of possible flood risk. It is understood that the Local Authority are undertaking some work in this regard given the importance of development sites identified within such flood risk areas. The site owner has retained the services of their own flood consultant to advise in this regard, and expects and is prepared to submit a full FRA with any future application. However, they would like it known at this stage that any 'joined-up' working would be greatly appreciated to work with Harrow in order to clarify the position and undertake any modeling exercises that may be required, given the extent of material that was presumably commissioned when undertaking the Strategic Flood Risk Assessment.</p>	Flood modelling.	<p>The additional detailed work to supplement the Level 1 &amp; 2 SFRA studies is now complete and will be published alongside publication of the AAP. It should be noted that the policies, in respect of the flood mitigation requirements for development within the central Wealdstone sub-area, have been amended in line with the recommendations of the further SFRA work.</p>

### Sub Area: Wealdstone East

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
12	Wealdstone East	<p>We need a revamped Leisure Centre to provide plenty of sports activities for young and old. Like the idea of Byron Park being linked to Leisure Centre and providing football pitches, could also have cricket pitch and nets, hockey field and netball courts.</p>	Need revamped Leisure Centre	<p>Support for improvement/refurbishment of the Leisure Centre is noted as are comments in respect of potential outdoor sports uses of Byron Park. The latter is subject to the finalisation of the Council's Playing Pitches Strategy and the Open Spaces Strategy</p>
16	Wealdstone East	<p>The Leisure Centre is an essential facility for residents. If it has to be refurbished, well and good, but replacement would take it out of commission for too long. If the latter cannot be avoided, at least leave the Herga Bowls Club untouched. This is the only indoor</p>	Retention of bowls club. Support for redevelopment	<p>Support for improvement/refurbishment of the Leisure Centre is noted as are concerns regarding replacement. Further work is still being undertaken by the Council to determine the most appropriate options available to</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		club for many miles around and is a central part of life for hundreds of senior citizens throughout the borough during the winter months when there are few other places for them to go. As the skate park is to be retained for the younger generation, who have many other facilities provided for them, it would amount to blatant age discrimination not also to retain the bowls club.	nt of Leisure Centre	improve the existing leisure offer and complex. This is likely to be the subject of a separate consultation exercise with the community outside of the AAP process.
38	6.4.3	You have stated under infrastructure "flood mitigation in accordance with FRA", did you mean SFRA?	Clarification	Yes it should state SFRA and has been amended
40	6.4 Wealdstone East sub area	While we support the provision of improved recreational facilities, we believe that their health benefits can be nullified if the car is seen as the default mode of access to them. To make a multi-storey car-park a major focus of redevelopment of the Leisure Centre sends all the wrong signals. In our opinion, parking close to the building should be restricted to cycles, provision for disabled people and essential servicing needs. The facility should be designed so that walking and cycling are seen as the major modes of access.	Car parking reprovision	The Leisure Centre complex is a strategic facility that serves the whole Borough. While the Council would hope that improvements in walking and cycling connections within the Heart of Harrow and to this site would encourage residents within the Heart of Harrow and wider Wealdstone area not to drive to use this facility, it is unrealistic to expect the same of residents living in South Harrow, Pinner or Edgware. Therefore, replacement car parking will be required.

### Site 08: Harrow Leisure Centre

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 8: Harrow Leisure Centre	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		water infrastructure.”		
31	Site: Leisure Centre	There is no Car Parking indicated on the Leisure Centre proposed site plan. The Leisure Centre suggested proposals look like a reduction in the area for Leisure use in favour of extensive residential development which is generally located on the current car park.	Lack of car parking facilities	The reprovision of the car parking for the Leisure Centre as part of the residential development was and is included in the site constraint text. <b>The site allocation illustration has been amended to reflect this requirement</b> Further work is still being undertaken by the Council to determine the most appropriate options available to improve the existing leisure offer and complex. This is likely to be the subject of a separate consultation exercise with the community outside of the AAP process

### Site 09: CA and Civic Amenity and Council Depot

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 9: CA & Civic Amenity and Council Depot	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted

### Sub Area: Station Road

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Para 6.5.3	The road is not one of the areas strongest assets. Surely a continuous building line will be sought on the “eastern and” western side of the road.	Continuous building line	For the most part, the eastern side of the road has a continuous building line, especially within individual blocks.
9	Sub area; Station Road	Why should the mosque be able to spill out on to this area? How do they get across the road?	New Civic Square and use by users of the Mosque	The provision of a new public space on the Civic Centre site is being proposed not just in respect of users of the mosque. However, the mosque is an existing community facility and the Council consider a public square on the Civic Centre site to be a better location for users of the mosque to congregate than on the footpath areas around the site. There is an existing signalled crossing that provides safe access across Station Road located only 20 metres to the south of the site.
12	Station Road Sub Area	Civic Centre site - like redevelopment ideas, but maybe six storeys high would be sufficient. Pedestrian access to	Green Spaces /	Support for redevelopment of the Civic Centre site is noted, as are concerns regarding building heights on the



ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Wealdstone and Harrow needs to be prominent and a large green space desirable.</p> <p>Greenhill Way car park could incorporate a permanent indoor market and a community space for youth clubs, theatre and room rentals for local societies and clubs as well as a creche for shoppers to use.</p>	Market / Community facilities potential	<p>Civic Centre site, which have been amended and reduced.</p> <p>A key objective of the AAP for Station Road is to significantly improve its environment through greening the corridor.</p> <p>The proposal for Greenhill Way car park has been amended to provide for a wider range of uses, including civic space and potential for shared democracy and theatre provision, as well as use of the area for events and markets (although not permanent)</p>
27	Station Road	<p>The ecosystem of small independent shops/businesses that have developed along Station Road could be severely compromised by the expansion of the larger stores in the area (e.g. Tesco) or new retail units appearing in the development areas. Clearly their financial situation will be fragile as a result of the current economic situation and additional, potentially unnecessary, competition is counterproductive to the healthy business environment of Harrow and Wealdstone.</p> <p>This is evidenced already by the increased number of empty shops in and around Harrow and Wealdstone.</p>	Tesco's expansion could jeopardise small local shops	<p>As part of the application to extend the existing store, Tesco's submitted robust evidence, which the Council had independently reviewed, that concluded that the impact of the expansion would not impact small local shops. On the basis of that evidence, alongside other considerations, the application was granted.</p> <p>In respect of the need for additional retail development within the Heart of Harrow and elsewhere in the Borough, this is evidenced in the Council's Retail Study, which provides floorspace figures required to ensure that, as a minimum, Harrow maintains its current levels of market share. It should be noted that Government policy is clear that competition is not a matter on which applications can be refused.</p>
28	6.5.3 Station Road	<p>This is a busy 30mph road which is currently unpleasant and dangerous to cycle on, and needs to be made into a high quality cycle route. There is space for continuous unidirectional cycle routes on both sides of the road, but this will require some car parking areas and bus stops to be moved, wide footways to be made slightly narrower, and fewer motor traffic lanes at junctions. The cycle routes should be segregated near junctions and wherever possible (e.g. to go safely behind bus stops), but where the road is narrow a 1.5m mandatory cycle lane can be provided instead. Transition between cycle paths and lanes should be smooth, not requiring cyclists to give way or change direction. The cycle lanes / paths should continue along Sheepecote Road, where the 4 lanes of motor traffic can be reduced to 3. The photomontage in Fig 6.29 shows no cycle facilities - this would be acceptable on quiet 20mph roads, but the reality on</p>	Potential for cycle routes along the road	<p>The potential design options for Station Road have not yet been determined and require further investigation. This work is currently the subject of a tender process tied to the Council's capital programme for this financial year. The tender brief requires consultation and engagement with interested parties in designing potential proposals for implementation. The comments made to the AAP, and the details of the respondents, are part of the material to be provided to the successful tenderer.</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>Station Road is that it will be much busier than the photo suggests. If the road is redeveloped without upgrading it as a cycle route the opportunity will have been wasted.</p>		
34	Station Road Sub Area	<p>Our three roads feed onto Station Road – one of the key sub areas identified for development and improvement in the “preferred option” plan. We are pleased the plan acknowledges the problems in this area including traffic congestion, the shabby look and feel of the area, and the difficulties experienced by cyclists and pedestrians. We support many of the key goals for Station Road including:</p> <ul style="list-style-type: none"> <li>• Plans to improve the public realm to provide a higher quality walking and cycling environment</li> <li>• Efforts to address traffic congestion and improve bus access</li> <li>• Plans to improve the look of Station Road by upgrading shopfronts and the restoration of the Art Deco facade on the Safari Cinema</li> <li>• Increased landscaping with more trees and plants</li> <li>• The creation of new public space to “enable activity from the mosque to spill out onto this area in preference to congregating at the corner of Rosslyn Crescent”</li> </ul> <p>The plan provides a blueprint for development and, as such, merely outlines a vision for the future. As residents living in the heart of the intensification zone we would expect to be fully consulted on any future detailed plans for development. Areas of particular concern/interest for our members include plans to create up to 430 new homes in the Station Road area, plans for the former Magistrates’ Court in Rosslyn Crescent and proposals to completely re-develop the Civic Centre site.</p>	<p>Station Road improvements</p> <p>Consultation on detailed development proposals / applications</p>	<p>Support for the improvements to Station Road is noted. All development within the Heart of Harrow will be the subject of a planning application (including the Civic Centre site), which will include both pre-application and post-application consultation with the community. With regards to the creation of new homes, the target for the sub-area has been reduced slightly in response to concerns over the height of development to be provided on the Civic Centre site fronting Station Road, which has been reduced and has therefore reduced the overall housing contribution this sub area is to make. With respect to the Magistrates Court, the Council understands that the Department for Justice has recently sold this to a charity or community organisation. As yet the Council remain unaware of the new owner’s intentions for the existing build or site.</p>
40	6.5 Station Road Sub Area	<p>The Action Plan presents a somewhat confused picture of the role of Station Road. We are worried, for example, by the mention (6.5.3) of ‘the balance between road users and pedestrians and cyclists’ with its implication that non-motorised people are not really road-users at all but just an inconvenient obstruction for drivers!</p> <p>Perhaps the plan is trying too hard to be all things to all people, promising ‘smoother traffic flow’ (which car drivers are likely to interpret as ‘faster journeys’) while at the same time creating ‘a better pedestrian and cycle environment.’ Short of</p>	<p>Clarification</p> <p>Conflicting aims re car / pedestrian</p>	<p>Paragraph 6.5.3 has been amended to clarify the intention to ‘reset the balance’ is in the favour of an enhanced pedestrian and cycling environment and to reduce the current dominance that traffic and vehicle movement has in and on the Station Road environment. The Council considers the proposals need to be considered as a package of measures. Mitigation measures to smooth traffic flows are in preference to major engineering solutions to increase junction and road network capacity. They are proposed not to address traffic growth as a result of development within</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>comprehensive redevelopment creating a wide boulevard (an unrealistic aspiration, at least in the short term), we do not think these conflicting aims can be achieved successfully without measures aimed at bringing about radical modal change or deterring certain types of motorised use.</p> <p>The first priority should be to improve the pedestrian environment by removing obstructions and forced deviations from the desire line, increasing the number of crossing points (with zebra crossings if possible) and reducing the speed of traffic through a 20 m.p.h. limit. We would like to see similar priority given to cyclists but realise that limitations on road space may make it more appropriate to encourage them to use a well-signed and prioritised parallel route. Bus priority measures should be introduced wherever possible and roadside parking eliminated (apart from provision for disabled drivers).</p> <p>In the longer term, it may be possible to introduce shared space on parts of this road. We are interested in experiments with this in other parts of London, but would like to see how these work in practice before suggesting that the concept is introduced in Harrow. We have concerns about the impact on partially-sighted people and other vulnerable groups.</p> <p>A priority for redevelopment must be the Civic Centre. It is a disgrace that at present it appears to be a car parking development with ancillary undistinguished public buildings. We are generally happy with the Action Plan's intentions for this site (though not 'family' housing in 4-storey apartments), but hope that some of the northern part of the site can be used to improve bus/rail interchange, particularly if a new bus route from the Kodak site along Princes Drive proves feasible.</p> <p>We are concerned that the planning permission recently granted for the Tesco site appears to have violated the objectives of the Action Plan. Media publicity emphasised the 'benefit' obtained by removal of a bus priority measure. That is surely sending all the wrong signals.</p>	<p>improvements as not achievable</p> <p>Priority should be to improve the pedestrian environment</p> <p>Introduce bus priority measures</p> <p>Concern over 4 storey family housing</p> <p>New bus route potential / improved access to station</p> <p>Concern over Tesco's re bus measures</p>	<p>the Heart of Harrow but existing congestion issues caused by through traffic. Traffic impacts as a result of new development are intended to be addressed through measures aimed at modal shift.</p> <p>The sub area objective to create a more consistent building line, is to assist in removing the forced deviations. In terms of the other measures mentioned, it should be noted that the potential design options for Station Road have not yet been determined and require further investigation. This work is currently the subject of a tender process tied to the Council's capital programme for this financial year. The tender brief requires consultation and engagement with interested parties in designing potential proposals for implementation. The comments made to the AAP, and the details of the respondents, are part of the material to be provided to the successful tenderer.</p> <p>Support for the redevelopment of the Civic Centre site is noted</p> <p>The removal of this particular stretch of bus lane was part of a package of measures discussed with Transport for London aimed at improving traffic flows on Station Road, and is therefore consistent with the sub area objective.</p>

## Site 10: Civic Centre

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 10: Civic Centre	It is not sustainable to demolish the Civic Centre. Development in the car park area is surely enough.	Civic Centre demolition	The current building is grossly inefficient in terms of sustainability, layout and the ability to keep pace with new technology and modern office requirements. Comprehensive adaptation, refurbishment and retrofitting are not financially viable.
9	Fig 3.3.1: Potential site layout of preferred option (Civic Centre)	<b>Where are the key views across the site to St Mary's?</b>	key views	
10	Site 10: Civic Centre	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change
24	Site 10: Civic Centre	GLA officers would welcome engagement with the Council with respect to the supporting land uses for this site.	Furth Engagement	Further engagement would be welcomed.
28	6.5.4 Civic Centre	If this site is redeveloped, this part of Station Road should be made wider to accommodate cycle paths or cycle lanes on both sides	Widen Station Road	
34	Site: Civic Centre	The development of the Civic Centre site must be carried out in close consultation with neighbouring residents. If the plan is to re-locate the council offices and library within the site, we would also like consideration to be given to the provision of new and much-needed cultural facilities including a small art gallery, and a community meeting room/event venue that would be available to	Consultation / Provision of new cultural facilities	Any proposal for redevelopment of the Civic Centre site will require a planning application, which includes both pre-application and post-application consultation with the community and affected parties. At the moment, all indications are that the Council will vacate the entire site and move the Civic functions into Harrow town centre

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		organisations like HCRA.		(the potential new site being the Greenhill Way Car Park).

### Site 11: High Road Opportunity Area

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 11: High Road opportunity area	Who is promoting the area potential missed use development as a main development site? All other such sites are in one ownership, this one is an anomaly. Has anybody talked to the freeholders?	Site assembly	This is not an anomaly – see proposal for Havelock place. The proposed change along Station Road is to be incremental overtime, however, it is important that the AAP set the strategy.
28	6.5.5 High Road	Most of the High Road is not wide enough for cycle lanes, but improvements can be made to the bridge and the area around the station. Northbound from the civic centre, cyclists should be allowed to ride on the footway up the ramp (they would be going slowly because it is uphill, and it is infrequently used by pedestrians) and space can be taken from the wide west side footway on the railway bridge to provide a cycle path. The cycle path can continue around the back of the bus stop to the station. Southbound, a cycle lane can be provided on the bridge but cyclists will then have to mix with traffic down the ramp until there is space to provide another cycle lane on Station Road.	Cycle path potential	
47	Site 11: Station Road Opportunity Area	Opportunity Site – Station Road - Site 11 – High Road opportunity Area. Whilst this site is on the East side of Station Road, and recognising that the boundary of the IA is more tightly drawn on the west side of Station Road in this area, are there now impediments which would discourage a similar improvement opportunity on the west side? How could this be encouraged?	Potential for similar allocation on the West side of Station Rd	

### Site 12: Tesco

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 12: Tesco	On the information available to date we do not envisage	Utilities	Noted

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		infrastructure concerns regarding Waste Water capability in relation to this site.	capacity	
28	6.5.6 Tescos	The Tesco site redevelopment should include segregated cycle paths on both sides of Hindes Road between the crossroads and the entrance to the Tesco car park, to allow cyclists on this key cycle route to be safe from the heavy traffic on this patch of road.	Cycle infrastructure	

### Site 13: Greenhill Way Car Park North

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 13: Greenhill Way Car Park North	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted
28	Site: Greenhill Way Car Park North	A pedestrian and cycle crossing facility should be constructed to cross Greenhill Way and enter Greenhill Road. In addition, the western end of Greenhill Way should be improved, with as a minimum the removal of barriers and provision of dropped kerbs to provide cycle access from side roads onto Greenhill Way.		

### Site 14: Greenhill Way Car Park and Debenhams

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
4	Site 14 Greenhill Way Car Park	I went along to Harrow on the Hill Station to-day and discovered that the car park behind Debenhams is going to be revamped. I can go with the shops going Station Road, providing the owner are offered alternative properties, maybe the Thursday market being moved to a slightly different place in the car park - however, what I CAN'T go with is even the remotest possibility of the MOBILE Audio Clinic building being moved to an entirely different location. This facility is delivered either late Tuesday evening or extremely early Wednesday morning ready for the day's clinic to take place. Should this clinic be relocated in a different area, this will cause severe inconvenience to a large number of people who need to		

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		be assessed for a hearing aid, be fitted with same or who are already users. Also, this clinic issues new batteries, can reprogramme the aids as appropriate- and deals with other problems when necessary. The bus stops are located very close to the pedestrian entrance of the car park, and the station is quite close.		
9	Site 14: Greenhill Way car park & Debenhams	Why is the Debenhams site limited to 3 – 4 storeys?		
10	Site 14: Greenhill Way Car Park and Debenhams	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change
16	Greenhill Way Car park	It is stated that the Greenhill Way car park "could be transformed into", among other things, a multi-storey car park. With other sizeable car parks in the area (eg, St. Anne's and St. George's) already operating close to capacity, the latter would be essential, not just something to be considered as a possibility.		

### Sub Area: Harrow Town Centre West

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
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ID	Section / Para	Summary of Comments	Topic / Change	Council Response
16	Harrow Western Gateway	With construction of the Morrisons store expected to finish this year, how can it be that nothing has yet been done yet to avoid the extra traffic chaos that will add to the existing dreadful congestion in the area? The council cannot allow the store to start trading until at least this aspect of infrastructure has been substantially upgraded.	Traffic mitigation	
28	6.6.3 Harrow Western Gateway	<p>The cycle path on the east side of Roxborough Bridge can be widened for two-way cycle traffic, and a cycle refuge constructed on the traffic island at the junction with College Road, allowing cyclists to cross the bridge and turn right (east) into College Road.</p> <p>Access from Roxborough Bridge to St George's centre can be improved by providing a dropped kerb at the end of the cycle path on west side of Greenhill Way, and a toucan crossing across Headstone Road leading to a segregated cycle path along the north side of Greenhill Way to St Kilda's Road, with narrowing of traffic lane from 2 to 1 lane. This would continue as a wide shared pedestrian / cycle path as far as Springfield Road, and the pelican crossing should be converted to a toucan crossing to access St George's centre.</p>	Junction improvements	The potential design options for Pinner Road junction have not yet been determined and require further investigation.
35	Harrow Western gateway	The end of Pinner Road, Neptune Point and the Roxborough bridge are NOT a gateway into Harrow. It is misleading to use the name "Harrow Western Gateway"; North Harrow, West Harrow, and South Harrow are all in Harrow and should not be forgotten. Also, we are worried that the idea of a "Gateway" might be used to justify a further tall building being built on the north side of Pinner Road, just as it was used to justify Neptune Point on the south side. We suggest that the sub-area should be called "Harrow Town Centre West" instead.	Sub area name	Agreed. The sub area name has been amended
35	Intensification Area Transitional zones	The inclusion of the north side of Pinner Road (Harrow Hotel and houses and gardens up to the cemetery) in the Intensification Area seems threatening. Please could you add some words to the draft Area Action Plan to the effect that residential and sensitive areas on the edge of the HWIA would not be considered for large or tall developments. In particular, any development on land backing onto Harrow Recreation Ground should not be any taller than existing buildings and should not encroach on existing gardens. Harrow Recreation Ground needs to be protected. It will be more and more needed as a resource	AAP boundary	Agreed, the boundary of the AAP area has been amended to exclude the northern side of Pinner Road



ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		for the expanding population.		
39	Harrow Western gateway	This sub area is dominated by several uncompromising high rise buildings which were built or begun before the AAP. They have an adverse impact on neighbouring residential communities and naming this sub area a 'gateway' does nothing to reassure those communities that things will not deteriorate further. 'Harrow Town Centre West' would be a neutral alternative.	Sub area name	Agreed. The sub area name has been amended
36	Harrow Western gateway	During the consultation period for the Core Strategy and the earlier draft of the AAP the northern boundary of the IA in this subarea varied. At that time we were discouraged from worrying about the precise position of the IA boundary. It now appears that the northern side of Pinner Road is included in the intensification area. This is a very sensitive area bordering the recreation ground and should not be considered for development under any circumstances.	AAP boundary	Agreed, the boundary of the AAP area has been amended to exclude the northern side of Pinner Road
40	6.6 Harrow Western Gateway sub area	We support the objective of encouraging pedestrian movement to the west, but are sceptical that this will be achieved (particularly after dark) if access relies on underpasses. Remodelling of the road system to reduce car-dominance and enable pedestrians to cross safely at street level should be a priority.	Pedestrian improvements	Strategic objectives have been amended to reflect the need for both underpass and street level improvements
25	Boundary Intensification Area	<p>We note, not for the first time, that the Intensification Area extends to two mainly residential areas whose inclusion does not seem to be justified in terms of any re-development, viz.:</p> <ul style="list-style-type: none"> <li>i. <b>Harrow Western Gateway</b> (why not call it Harrow Town Centre West?) - the houses and gardens (also the hotel) on the north side of Pinner Road which back onto Harrow Recreation Ground, a much loved and used park which enjoys Green Flag and Gold Safety Award status</li> <li>ii. <b>Harrow Town Centre East</b> – Ashburnham Avenue, Ashburnham Gardens and Shepcote Road (also Harrow High School)</li> </ul> <p>The consultation document at para 5.1.43 is reassuring on building heights at the edge of the Intensification Area, referring</p>	AAP boundary	Agreed The sub area name has been amended as has the boundary of the AAP area to exclude the northern side of Pinner Road

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		to “a managed transition of development with neighbouring suburban areas”. In the absence of any obvious explanation for the inclusion of the areas listed above, is difficult to escape the conclusion that such areas have been included to permit the accommodation in the Intensification Area of as many tall buildings as possible and/or to make compulsory purchase of properties easier to achieve.		

### Site 15: Neptune Point

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
4	Site 15 Neptune Point & Site 16 Bradstowe House	Whilst the underpass is being looked at to revamp, the entrance to Lowlands Road needs some possible alteration - it is very unwelcoming once nightfall occurs. The flight of stairs under the underpass going to over the top of the railway line is again very unwelcoming, especially at nightfall and later.	Entrance to Lowlands Road	Agreed. AAP amended to include a requirement to consider alterations/improvements to the entrance of Lowlands Road within the sub-area requirements
10	Site 15: Neptune Point	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. “Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”	Utilities capacity	This development has already been granted planning permission and construction is almost complete. Thames Water was consulted as part of the notification of the application. No change

### Site 16: Bradstowe House

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 16: Bradstowe House	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	Utilities capacity	This development has already been granted planning permission and commenced construction a number of years ago. Thames Water was consulted as part of the notification of the application. No change
12	Bradstowe House	It would be good so see Bradshaw House completed – the empty shell looks dreadful as one enters the town.	Complete development	The Council agrees

### Site 17: College Road West

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 17: College Road west	Why is there no fundamental change to the bus station?		
10	Site 17: College Rd West	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it	Utilities capacity	The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”		
28	6.6.6 College Road West	Cycle access to Harrow town centre is currently very poor. A segregated two-way cycle path can fit around the corner of site 17 on the wide footway (along Headstone Road and College Road, with a toucan crossing at the junction with Kymberley Road). Together with the short stretch of contraflow cycle lane on College Road outside St Ann's Centre that has already been approved by the council, this will create a safe and convenient route from Roxborough Bridge north roundabout via Junction Road to College Road.		

### Sub Area: Harrow Town Centre

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Para 6.7.2	The bus and train stations are ineffective not effective! The recent public realm improvements along Station Road are bland and sparse. You are correct in that there is a lack of a clearly story for the future of Harrow Town Centre, but this document does not provide it. So far as I can see the developer interest is not strong, other than Dandara.		
12	Harrow Town Centre	Step-free access to H-on-the-Hill Station would be good. Again development of the P.O. site would be good to see – not sure I want it to be 19 storeys high. Lowlands Road recreation ground could be a pleasant focal point for flats built on the station multi-storey and travellers approaching or leaving the station to the south. Developing a walk through from Havelock Place to College Road is an excellent idea especially if it incorporates public space and some child-friendly features. With all this extra housing in Harrow Centre are we going to need another primary school or a community school for all ages?		
15	Harrow town	Whilst I am in favour of redevelopment in general, I am appalled		

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
	Centre Sub Area	<p>at the height of some of the buildings proposed. The Lyon Rd site for instance, a tower of 19 storeys reducing down the road to 10 (I may have the exact figure wrong, but close enough) plus the Old Post Office site an even higher building being discussed. Both proposals are far too high for leafy green Harrow.</p> <p>I was assured avenues be left to preserve the views of Harrow Hill, which is fine if you live in line with one of those clearways, but what if your view is from the side, blocked by a massive 10 storey block of flats.</p> <p>Sadly those living in flats are usually only passing through the town and have no interest in the area. I am aware of the Government's instruction to fill our Borough with strangers but surely long term residents who care deserve some consideration. Some of us, second and third generation and will probably still be here when the rest of you move on to greener pastures after ruining the skyline of Harrow. Please don't let the developers destroy our town.</p>		
18	Harrow town Centre	<p>A small, lively theatre with a coffee bar and day time activities would be a great addition to Harrow Town Centre. It would also provide a home to local drama groups which have to go outside the borough currently to access purpose built practice and performance venues.</p> <p>I believe the master plan should include such a theatre in Harrow Town Centre.</p>		
25	Harrow Town Centre	<p>The document carries a number of references to the relocation of the central library to Harrow town centre and to the removal of the Council offices from the present Civic Centre site, presumably also to Harrow town centre. It is however silent on where these buildings might be located. Similarly the incorporation of leisure and cultural uses are promised for Harrow town centre. In a town currently starved of such facilities, this is welcome news. However, again there is no clue as to what they might be and where the planners envisage their location. Potential developers will think they need do no more than put in plans for flats and houses with a nod in the direction of ground floor commercial/community use. The application by</p>		<p>Lowland – outside Dandara Greenhill Way car park</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>the Lyon Road developers is a case in point; at the presentation last August the staff on duty were unaware of the plans for a new town centre library. The size and importance of these facilities for Harrow and its residents, both present and future, is such that their proposed siting must be an essential element of the vision for the future shape of Harrow's town centre and should therefore be included prominently in the plan. Further, it could be an important way to achieve the engagement of local residents in the planning process.</p>		
25	Harrow Town Centre	<p>Understandably envious eyes are being cast towards modern retail centres like Ealing and Uxbridge. However changing shopping habits coupled with the effects of the recession mean that the future of such places must be uncertain. Thus Harrow has a unique opportunity to create a centre that reflects the changing trends. Chapter 8 lists some possible alternative uses and proposals are invited, as are ideas for the imaginative community use of empty properties, including their temporary usage. We suggest that a brainstorming session of the Community Forum might be organised for this purpose.</p>		
28	6.7.3 Harrow town centre	<p>Link between St Ann's Road and College Road via Havelock Place should be available for cyclists as well as pedestrians. It would also be desirable for a cycle route to be provided along St Ann's Road, as there is space for it, but it would require rebuilding the road surface. The convenience of being able to park your bike just outside the shop would attract more cyclists to shop in Harrow.</p>		
32	Sub Area Objectives	<p>The Council have identified seven sub-areas which make up the Harrow and Wealdstone Intensification Area. Our client's site is located within Harrow Town Centre (Section 6.7). Dandara supports, in principle, the assessment and key objectives for the sub-area which seek to create greater integration across the area, improve the quality of the environment (through de-cluttering, public realm enhancements and the creation of a more cosmopolitan type environment), introduce a true mix of retail, leisure and commercial uses and promote the 'inhabitation' of the town centre exploiting its accessibility to public transport. The developing proposals for the College Road site embrace these objectives. However, it is considered that the Strategic</p>	Sub area objectives	<p>Support for the sub area objectives is noted. The suggested inclusion of a landmark development has been included</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		Objectives for the sub area should include reference to landmark or tall buildings given that this has now been established in principle and that such a building at this site will have strategic importance within the sub area and Intensification Area as a whole.		
40	6.7 Harrow town centre	<p>This is another place where a railway line acts as a barrier to movement. Priority must be given both to a good pedestrian and cycle route from College Road to Lowland Road and a step-free means of access to the station platforms.</p> <p>We welcome the proposals to improve Lowlands Recreation Ground and remove the ugly car park. It is particularly important to establish an attractive and direct vehicle-free pedestrian route through the recreation ground to the station. In general, pedestrian access to the station from the south needs improvement and traffic movements should be restricted to enable this. It is another place where a 20 m.p.h. limit would be a considerable benefit. A (new or diverted) bus service along Lowlands Road would improve access options to the station from south of the railway line and might relieve some of the pressure on the bus station.</p> <p>We are disappointed at the lack of ambition the Plan displays in securing new cultural and community facilities in the centre of Harrow. There no mention at all of the Arts Centre and the desirability of relocating it to a more accessible location. The word 'theatre' does not appear anywhere in the document.</p>		
34	Harrow Town Centre	<p>The plan highlights the fact Harrow Town Centre's retail offer is "dominated by middle range and value national retailers". We would like to see a much greater emphasis on attracting high quality independent stores – including artisan food stores - to the town centre alongside more independently-owned high quality pubs and restaurants.</p> <p>Overall we would like to see a dramatic increase in the number of new trees planted within the Heart of Harrow zone.</p>		

**Site 18: Havelock Place**

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 18: Havelock Place	What about the street frontages to Station Road and St Anne's Road. They deserve a mention and special attention yet there is none.		These are not a site allocation so are covered in policies, specifically AAP1, AAP4 and AAP7
10	Site 18: Havelock Place	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted
14	Site 18: Havelock Place	<p>POL's Harrow CO falls within the Harrow Town Centre Sub-area. Further, it falls within the boundary of 'Site 18: Havelock Place' which is identified for future development.</p> <p>The site description for 'Site 18: Havelock Place' states that the area comprises:</p> <p><i>"0.57ha, backland site comprising service yards to the St Anns Centre and premises fronting Station Road and College Road, together with free standing fitness centre"</i></p> <p>Further, we note that the 'design considerations' for this site seeks to (with emphasis added):</p> <p><i>"consolidate and rationalise existing service areas and [the] redevelopment of part of College Road frontage to secure a new pedestrian link to Station Road and St Anns Road".</i></p> <p>Figure 6.5 broadly identifies the areas for future development within 'Site 18: Havelock Place', namely the location for mixed use development; the rationalisation of service and access yards; and creation of new public space. However, it is not clear whether POL's Harrow CO on College Road is identified for future development and we therefore request that the Council provides confirmation in this regard.</p> <p>In the event that the Council identifies POL's Harrow CO site for redevelopment as part of 'Site 18: Havelock Place', we request that the accompanying detailed policy in the emerging AAP explicitly states that this would be subject to reprovision on-site or re-location to a suitable location prior to any redevelopment of their site. This will ensure that POL's operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a 'universal service' for the UK, as</p>	Clarification	The Council can confirm that the POL site on College Road is not one of the retail units it has currently identified as having potential to provide the new pedestrian link through to Havelock Place



ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		defined by section 4 of the Postal Services Act 2000.		

### Site 19: 51 College Road (Dandara)

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
6	Site 19 51 College Road	I welcome the idea of relocating the central reference Library and Central Lending Library in Harrow Town Centre. However, it will be important to ensure that this not a downsizing operation and that as many seats are provided in this central Library as already exist in the Central Reference and Lending Libraries.		
9	Site 19: 51 College Road	Harrow has never been a destination of choice and quality. It is unlikely that it ever will be.		
9	Site 19: 51 College Road	<b>How about the Viewing Cones from the north? Why they are not introduced?</b> The view from the right hand "eye" in College Road is right in front of a 3 storey building! 15 – 19 storeys is not acceptable. There is no place for this in Harrow Town Centre. There is no justification to go above the current highest level of building in the Centre.		
9	Site 19: 51 College Road	It is in the identified view cone from the north as well. The principal of a tall building was accepted by a Planning Inspector. Others may have a different opinion. Things have changed since then and the Views Assessment basically destroys any argument for a tall building. To say otherwise is contrived. No high buildings can make a significant positive contribution to the Harrow skyline. There is no need for another highly visibility asset from the Intensification Area. New buildings should be exemplary in terms of sustainability. There is no reason why they should not be close to zero carbon.		
10	Site 19: 51 College Road	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake	Utilities capacity	This site has already been the subject of a planning application and, although not granted, Thames Water was consulted as part of the notification of the application. It should be noted that Waste Water Services was not one

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."</p>		<p>of the grounds on which that application was refused. No change</p>
32	Site 19: Former Post Office	<p>Section 6.7.5 identifies our client's site, 51 College Road, as AAP Site 19. However, we have concern as to the way the Council and/or its consultants have sought to 'design' a potential site layout for the site and others within the AAP. There appears to be no justification for this design approach and its inclusion within the AAP is misleading and prescriptive. Our client considers that the annotation of individual blocks with potential heights could restrict the evolution of a new design for the site which embraces the objectives of the AAP. If the inclusion of heights is necessary then these should clearly be given as indicative and the commentary should highlight that the figure is an illustration of one (of many) options as to how the site may develop. It might be preferable to remove these from the figure and for the Design consideration section to include under the 'tall building' criteria comment that an acceptable scheme is likely to comprise a number of buildings of differing heights which would be expected to be in the order of 8-19 storeys. As it stands, Figure 6.52t implies that this is the 'right' approach or one that the Council will support. Despite the Council's comments in paragraph 1.4.5 that it has worked with developers and this has been useful to alert the Council to issues likely to arise in potential proposals, these have not been factored into the potential site diagram.</p>		<p>The diagram is intended to be illustrative and has been amended to be more diagrammatic. Heights are base on detailed urban design analysis</p>
32	Site 19: Former Post Office	<p>The College Road site, for example, has significant rights of light and noise constraints which impact the potential layout indicated in the figure and which would, as a consequence be</p>		<p>The diagram is intended to be illustrative and has been amended to be more diagrammatic. The inclusion of a diagram is considered necessary and in keeping with the</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>undeliverable. In addition, the potential site layout shows all the ground floor area as public realm yet given the proposed minimum housing output requirement (400 units) for the sub area provides no ground floor communal space. This would be compounded further by the Policy AAP6 requirement of giving public access to roof tops and top floor and together would result in no 'door stop' play space being capable of being provided. This is wholly inappropriate, particularly as elsewhere in the draft AAP the Council state that larger developments should provide larger units. This would require residential units to either all have balconies. The potential site layout also shows the built area close to the railway line which would compromise the inclusion of balconies due to issues of noise and safety. These are merely a few examples of the problems of the potential site layout; but a layout that will undoubtedly be used to drive the sites design. However, it is not the role of the Council to seek to 'design' schemes through the AAP, but to set guidelines and parameters within which the site can be developed.</p> <p>Therefore the 'Potential Site Layout' should be removed.</p>		<p>approach taken on all other sites</p>
32	Site 19: Former Post Office	<p>Our client's support the key site objectives albeit would comment that as there are currently no existing views of St Mary's Church from the site. This section should therefore be amended to reflect this.</p> <p>Minimum Outputs</p> <p>Whilst it is appreciated that the Intensification Area has a number of key objectives of its own in respect to the delivery of both jobs and new homes, our client considers that the establishment of 'minimum' outputs could prejudice the delivery of other priorities within the AAP and the development of the overall design.</p> <p>In addressing the issues reached by the Secretary of State in his appeal decision on the site, the sole reason for refusal was on the basis of architectural quality. The AAP brings forward, in the context of the urban design analysis carried out in respect to that appeal, a number of additional objectives that the site should deliver. In embracing these a new design approach has been adopted. However, in delivering the leading and supporting land use requirements, together with the</p>		<p>Noted and agreed</p>

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>requirement for increased through-site permeability, public realm and civic space, could result in a design that exceeds the parameters accepted by the Secretary of State and a building(s) which would exceed the envelope already established. Accordingly, we believe that this minimum output requirement should be expressed as a target with an applicant being required to demonstrate why this cannot be achieved where a proposal falls below the target figure.</p>		
32	Site 19: Former Post Office	<p>Site constraints/dependencies  The use of the word 'key' in criteria 2 implies that there is already evidence that establishes views from this location as being 'key'. As no views currently exist it is inappropriate to refer to a potential view in this way until a formal assessment of it has been carried out.  The potential site layout plan shows views to College Road however views from within the site should be equally acceptable given that this will not only become a key area of public realm within the town centre but will also lie within the primary shopping area as set out within paragraph 8.27.  The inclusion of two different 'views' within the potential site layout of 'potential new' and 'possible future' view to St Mary's Church suggests that these are locationally specific. There is clearly no justification to support any requirement for a view in a specific location and the objective of a creating a new view to St Mary's Church should not be prescriptive as to location as this needs to be established through the necessary design process rather than taking a prescriptive approach that could prejudice development coming forward.</p>		
32	Site 19: Former Post Office	<p>Design considerations &amp; Figure 6.52  In principle our client supports the design criteria set out which reflect the urban design assessment considered and accepted by the Secretary of State and discussions which they have been having with the Council in preparation for the submission of new proposals for the site.  Consideration 1 confirms that the principle for a tall building on this site. However this should be expanded to refer to, <i>up to 19-storeys in height</i>, which was accepted by both a Planning Inspector and the Secretary of State for Communities and Local Government. The previous</p>		

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		<p>appeal decision was a Secretary of State's decision and in his letter he explicitly commented on the height to which the principle was established. This point was also discussed in the Core Strategy EiP. Accordingly, we would recommend that the scale of height accepted by the Secretary of State should be included within this section and the section amended to recognise that the determination was the Secretary of State's and not an Inspector's. This would be consistent with the Core Strategy and should be reflected within the APP as well. Further, and with regard to the Views Assessment, the Secretary of State's position in respect to this site specifically that tall and taller buildings serving as a landmark to the town centre, higher than their surrounding buildings and which projected above Harrow Weald Ridge was acceptable should also be listed as a design consideration the principle for which has been accepted. The Views Assessment provides no new evidence to warrant setting aside the appeal Inspector and Secretary of State's view and this approach is no different to that accepted in the Core Strategy EiP and would be consistent with the comment and direction given by the Inspector then. With respect to the provision which seeks to improve permeability and views (Consideration number 3) we would object to the use of the word 'radically' as improvements should form part of an integrated design approach rather than what might be construed as something more overt. In respect to the comment regarding the establishment of new views to St Mary's Church this should be seen in the context of the development itself and not, as illustrated in Figure 6.52 purely from College Road. One of the key elements in exploiting the wider objectives of the AAP is the creation of restaurants and café's to contribute to the wider activity of the town centre. These too may wish to exploit opportunities from within the site and use the views as a catalyst. These are design issues in themselves.</p>		
32	Site 19: Former Post Office	<p>We would therefore request that this consideration be amended as follows:  <i>"Opportunity to improve physical and visual permeability into, within and through the site; the creation of new views to St Mary's Church must be explored and assessed having regard to site</i></p>		The text has been amended to clarify what was intended by this statement

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p><i>constraints such as topography, design constraints and the other objectives for the AAP</i></p> <p>The annotations on Figure 6.52 should also be amended. Our client would ask for clarification as to the second sentence of design consideration number 5 starting <i>“Provide confidently scaled buildings that relate ....”</i> It is considered that this sentence does not specifically make any contribution to this section being subjective in nature and, in any event, it seems to be trying to recommend a requirement that has been addressed elsewhere.</p>		
32	Site 19: Former Post Office	<p>Site specific infrastructure</p> <p>We have already made comment regarding the issue of public access to roofs/rooftops. The creation of upper level amenity areas with general public access could compromise the wider requirements of the outputs sought at this site. For example, GLA Supplementary Policy in respect to the provision of Children and Young People’s Play and Informal Recreation space will be difficult to achieve given the scale of residential provision proposed. This was demonstrated in the last proposals for the site where private communal space was provided both at roof level and ground level to meet the development needs. With the objectives for the site in terms of physical permeability, civic space and public realm at ground level, it will be difficult to deliver these and wider policy requirements if roof space is to be publically accessible as well. If the incorporation of upper level amenity area is to serve residential occupiers then we would have no objection to its inclusion in this section subject to that clarification. If it is for public access, then our client would object on the grounds stated.</p>		
32	Site 19: Former Post Office	<p>Delivery</p> <p>As much as our client would like reference to the appeal as being upheld, it was in fact dismissed albeit as recognised by the Council and the Core Strategy EiP Inspector only on one key issue; architectural quality.</p> <p>Accordingly, we would ask that this section be amended to read as follows:</p> <p><i>“The site was the subject of a planning appeal in 2010 which was considered by the Secretary of State for Communities and</i></p>		

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p><i>Local Government and dismissed on the basis of architectural quality.</i></p> <p><i>The principle of the proposed re-development and a tall building of up to 19-storeys on this site was however established. The urban design analysis undertaken by the appellant and the Council have informed the design considerations above. The Council is currently in pre-application discussions with the developer (who has already presented to the Major Developments Panel) regarding new proposals for the site which build upon the previous scheme in the context of the AAP objectives and policies. It is envisaged that an application will be made in late 2012/early 2013 and assuming planning permission is granted in 2013 completion of the development on the site is expected in 2015/16."</i></p>		
44	Site: 51 College Road	<p>It is not clear from the consultation draft AAP what status the site-specific proposals will have. For the purposes of clarity and certainty, we recommend that the site-specific proposal is given clear policy status.</p> <p>Given the ability for sites to change ownership, we do not consider it appropriate for the site proposals to be developer specific (as this risks limiting future flexibility). Accordingly we recommend replacing references to any specific owner with 'the site's current owner'.</p>		
44	Site: 51 College Road	<p>The scope of the site specific proposals for Site 19 must establish sufficient policy certainty to enable the determination of a future planning application. Having regard to this, we support the general scope of the site specific proposals in terms of: (1) establishing site objectives; (2) defining appropriate land uses; (3) defining the amount/quantum of development; and (4) establishing design principles. It is our view that the detail would benefit from refinement, and it is with this in mind that we set out detailed comments on the draft site-specific proposals below:</p>		
44	Site: 51 College Road	<p>We support the key site objectives with the exception of 'increasing.....physical permeability of the site'. We consider that this is a matter that should be explored as part of the preparation of detailed site proposals, and that it would be premature to set it as an objective at this stage until it has been thoroughly tested in terms of urban design, accessibility,</p>		

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		<p>pedestrian safety, and impact on the footfall of the secondary shopping frontage. We address this matter further in the 'design considerations' section below.</p> <p>In terms of recommended refinements/amendments we recommend that the objective of increasing physical permeability of the site is removed as a key site objective (and instead is dealt with in the 'design considerations' section).</p>		
44	Site: 51 College Road	<p>Our client supports the proposed land uses for the site however considers that a more flexible approach should be adopted, which could include support for further 'supporting' uses, in order to ensure effectiveness.</p> <p>It is our view that the relevant considerations in determining the appropriate land use mix for the site are: consistency with national policy (which includes the requirement for town centre sites to be suitable, available and viable for the proposed use); emerging local policy; development need; the site's planning history; and deliverability.</p> <p>In terms of the policy context, the site is located within the town centre boundary (as defined on the draft Proposals Map), therefore the provisions of PPS4 dictate that the site is, in principle, suitable for 'town centre' uses (we note that these principles are carried forward in the draft National Planning Policy Framework). PPS4 defines 'town centre uses' as comprising: retail, leisure, entertainment, intensive sport/recreation facilities, offices, and arts/cultural/tourism development (including hotels), and residential. The College Road frontage is defined as a 'Secondary' frontage where PPS4 supports a 'diversity' of uses and Policy 43 of the draft Harrow Development Management Policies DPD supports retail, leisure and cultural uses at ground floor (with active frontages) and residential, offices and leisure uses at upper levels. It is with this policy context in mind that we set out comments on the proposed 'leading' and 'supporting' land uses (which includes reference to proposed site specific infrastructure) below:</p>		
44	Site: 51 College Road	<p>Leading land use – The principle of a residential-led mixed use development with commercial uses at ground and residential on upper levels has been assessed as being acceptable in planning terms by the Secretary of State and an independent</p>		



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		<p>Inspector, and would be consistent with the above policy context. This is reinforced by evidence of significant need for additional housing in the borough (as set out in the housing evidence prepared by the Council to inform the LDF). Furthermore, the ongoing negotiations with the current landowner clearly indicate that there is market appetite to bring forward residential-led mixed use development on the site, with a supportive financial position established by our client signalling viability. It follows that residential should be the principal land use, as currently proposed.</p>		
44	Site: 51 College Road	<p>Supporting land uses – In policy terms a broad range of supporting ‘town-centre’ uses would be appropriate (particularly on ground/lower levels), as considered below:</p> <ul style="list-style-type: none"> <li>- Retail – This is an appropriate location for retail in policy terms and is likely to be viable.</li> <li>- Leisure (including food and drink), entertainment, intensive sport/recreation, and arts/culture/tourism uses are all appropriate uses in policy terms and a combination of some/all of these would contribute to a commercially viable and attractive mix of uses.</li> <li>- Offices – It is our view that office development is unlikely to be viable in this location, which is reinforced by the Council’s LDF evidence. Accordingly, while the site specific proposals could allow for this land use as an appropriate supporting use (to account for potential changing market conditions over the plan period) it should not be a ‘requirement’ (on the grounds of deliverability/viability).</li> <li>- Civic/Community – There does not appear to be any evidence to justify how a new Harrow Library could be funded. We note that it would be unrealistic to expect this to be cross-funded by enabling development by a private developer elsewhere on the site (on viability grounds), and we would not expect it to meet the relevant tests for a planning obligation associated with the development of the site. Accordingly, while the site specific proposals could allow for ‘community/civic’ uses (to account for the eventuality of funding being made available) the reference to a new library should be deleted from the ‘site specific infrastructure’ section (on the grounds of deliverability/viability).</li> </ul>		

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		<p>- Public Open Space – We recommend that the terminology is revised to distinguish between ‘public realm’ and ‘public open space’ (which is generally interpreted as ‘green’ space). Bearing in mind the proximity of Lowlands Recreation Ground (and the competing pressure to accommodate satisfactory levels of private amenity and play space) we consider there to be no need for public open space on this site. However we recognise the opportunity to introduce a new area of public realm within the site (as is required by the design considerations). For the purposes of clarity, we recommend removing reference to ‘public open space’ in the ‘site specific infrastructure’ section while relying on the design considerations to secure new/improved public realm within the site.</p>		
44	Site: 51 College Road	<p>It is on the basis of the above that we recommend that the policy is refined to support the following:            _ Leading land use: Residential (flats)            _ Acceptable supporting land uses: Retail, leisure, entertainment, intensive sport/recreation, offices, arts/cultural/tourism, and civic/community. The proposals should be clear that these are not ‘requirements’ but that some/all of these non-residential uses would be acceptable as part of a mix of uses.</p>	Land uses	Acceptable land uses applicable to development of the site have been amended to include those listed Dealt with in paragraph 6.1.2 as applicable to all allocated sites
44	Site: 51 College Road	<p>Detailed design work undertaken to date demonstrates that the site has capacity for at least 400 dwellings, therefore our client supports the proposed ‘minimum outputs’.</p>	Housing number	Support is noted
44	Site: 51 College Road	<p>Our client supports the principle of including a set of design ‘considerations’ with a supporting illustrative layout plan. However, it is essential that caution is exercised to ensure that these are not overly prescriptive in order to ensure that the policy incorporates sufficient flexibility to allow the highest quality design and best overall solution for the site to be progressed. It is essential that the AAP makes it expressly clear that the indicative layout plan is ‘illustrative’ only. Accordingly, our client expresses general support for these considerations, subject to the following refinements that should account for the following points:</p>	Site diagram	The diagram is intended to be illustrative and has been amended to be more diagrammatic. The inclusion of a diagram is considered necessary and in keeping with the approach taken on all other sites
44	Site: 51 College	<p>Building Heights – The matter of building heights has been</p>		

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	Road	<p>thoroughly tested, with the Secretary of State determining that the site is suitable for tall buildings (planning application ref. P/1620/08CFU). A 'tall building' was clearly defined by the Secretary of State as being of up to 19 storeys. The draft design considerations establish support for 'tall' buildings on the site, but this is not quantified in terms of storey height (or metres). In order to provide sufficient policy certainty (and avoid the risk of this matter being unnecessarily re-opened in future), we recommend that the proposal wording is refined to be clearer on this key matter. We suggest adding text that clearly states that building heights of up to 19 storeys are supported on the site, and that this should be supported in a much more promotional manner that recognizes that a tall building on this site is likely to act as a catalyst for the revitalisation of the town centre as a whole and will make a significant contribution to the achievement of many of the AAP objectives. This principle should be reflected in the illustrative layout plan which currently shows two buildings, one of 8-12 storeys the other of 15-19 storeys. While we recognise that this plan is purely illustrative and that a variation in heights across the site may be appropriate, it is premature to define these details on a plan at this stage (it should be tested (in urban design/townscape terms) as part of the preparation of planning application proposals), with the design considerations text being used as the appropriate mechanism to establish policy control over future building heights (up to 19 storeys).</p>		
44	Site: 51 College Road	<p>Permeability – The site forms the bulk of a well defined urban block. The provision of a new pedestrian route through the entire site (connecting College Road to Station Road) could form part of a satisfactory design solution, but other than providing access into the interior of the block we can see no discernible benefit of increasing permeability through the entire block (for example, it will not significantly reduce the walk-time between the two points shown on the indicative layout plan, risks reducing footfall along Station Road/College Road (which are defined Secondary Retail Frontages), and may pose pedestrian security problems). Accordingly, we recommend revising the</p>		

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		draft proposals to identify this as a potential 'opportunity' to be tested at the planning application stage (not a requirement).		
44	Site: 51 College Road	Views – The recommendations of the Harrow Views Assessment (2012) provide an appropriate evidence base to justify the aspiration for the creation of view corridors through the site (from College Road to St Mary's church). We recommend that clarity is added to recognise that view corridors do not need to be at ground floor (noting the level change between College Road and St Mary's Church) and that the opportunity is likely to be for view 'glimpses' (with consideration given to defining corridor widths). We recommend that the terminology used on the indicative layout plan is made consistent ('future' and 'new' are used inconsistently).		
44	Site: 51 College Road	Building Footplates/Footprints – We recommend that a further design principle is added to establish the principle that the site is suitable for buildings with larger floorplates (subject to appropriate townscape/massing testing as part of scheme preparation) which are likely to be required by the proposed land uses and in order to be compatible with the proposed building heights. This principle should be reflected in a revised indicative layout plan which currently shows very shallow/narrow floorplates which could prove difficult to achieve.		
44	Site: 51 College Road	As noted above, our client is committed to supporting the redevelopment of the College Road site which is coupled with clear evidence of developer interest in bringing forward the site, which together establish a clear route to delivery (and therefore underpin the soundness of the draft site specific proposals). Deliverability is dependant on a supportive site-specific policy position being established in the AAP that allows a viable form of development to proceed, and which incorporates sufficient flexibility. Consequently, it is dependant on the comments set out in this representation (above) being positively addressed in the next draft of the AAP and carried through to adoption. In conclusion, our client would like to reiterate its in-principle support for the preferred option AAP proposals, particularly in respect to Site 19, and looks forward to engaging further with the Council in due course.		

## Site 20: Harrow on the Hill car park west

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 20: Harrow on the Hill car park west	Needs better turning and drop off facilities. It is chaos most of the time.		
9	Site 20: Harrow on the Hill car park west	Delivery If it is not an identified development site there is no consistency in this document for it to be included. There are many other sites equally worthy of inclusion on this basis and indeed there is every right for the document to be far wider ranging than it is.		
10	Site 20: Harrow on the Hill Car Park West	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted
39	Site 20 and 22	We support the broad principles and objectives of the Harrow and Wealdstone AAP in particular development proposals on site 20 and site 22, subject to commercial viability. As a landowner we would welcome the opportunity to discuss the development opportunities on the site and wider area in more detail.		

## Site 21: Lowlands Recreation Ground

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 21: Lowlands recreation Ground	The design conflicts with what should be a better turning and drop off area.		
28	6.7.7 Lowlands Recreation Ground	Also consider a cycle path along Lowlands Road / Tyburn Lane / Kenton Road leading to the Northwick Park Roundabout. This is a busy route with much traffic and is currently unattractive for cycling, but forms part of an important route between Harrow on the Hill station and Northwick Park Hospital / University of Westminster. The footway on the south side of Kenton Road is infrequently used and can be widened and converted to a shared use path. The cycle path should continue to Tyburn Lane through the junction with Peterborough Road (via a toucan crossing) and alongside The Grove Open Space at least as far as Harrow on the Hill station.		

ID	Section / Para	Summary of Comments	Topic / Change	Council Response

### Site 22: Harrow on the Hill car park

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
10	Site 22: Harrow on the Hill Car Park East	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Utilities capacity	Noted
39	Site 20 and 22	We support the broad principles and objectives of the Harrow and Wealdstone AAP in particular development proposals on site 20 and site 22, subject to commercial viability. As a landowner we would welcome the opportunity to discuss the development opportunities on the site and wider area in more detail.		

### Sub Area: Harrow Town Centre East

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Sub area: Harrow town centre east	What other uses – very few.		
40	6.8 Harrow town centre east	We are concerned that many of the apartments proposed for this area will be used for housing young families in overcrowded conditions, within both the social and private rented sectors. Some genuinely affordable low-rise family housing should be included. Density and green-space provision could be maintained by making the developments car-free. This would be an appropriate measure so close to the town centre with its very good public transport facilities.		

### Site 23: Lyon Road

ID	Section / Para	Summary of Comments	Topic / Change	Council Response

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 23: Lyon Road	<p>There is no justification for 12 – 14 storeys. It is outside the main Town Centre, probably within the visibility arc from Wood Farm.</p> <p>It is also in the transition zone next to much lower neighbours. It should be less in height than Platinum House.</p> <p>It is commendable to put a statement building on the corner, but this does not require over dominance or height.</p> <p>Why is there no proposal or suggestion for the buildings on the east side of the road opposite?</p>		
9	Site 23: Lyon Road	<p>Design considerations.</p> <p>The buildings do not have to be tall to be special character. The character will not benefit from a large public realm opportunity. Large = overwhelm.</p> <p>The buildings should be “Exemplar” buildings.</p> <p>The building should be highly sustainable and close to zero carbon. This should be included.</p>		
10	Site 23: Lyon Road	<p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. “Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”</p>	Utilities capacity	<p>The Core Strategy already includes Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a ‘core policy’ it is not necessary to repeat this again in the AAP.</p> <p>No change</p>
20	Fig 6.61 Lyon House	<p>The appropriate height of a building depends on many factors, including its architectural quality. We consider that specific heights should be omitted from the diagram as being too blunt and prescriptive. Moreover, office floor to floor dimensions are different from residential so it is potentially misleading to specify the number of storeys in isolation.</p>		
42	Site: Lyon Road	<p>We notice that importance is attached to “carefully negotiating</p>		

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
		the transition between..." town centre and residential areas. This seems to be disregarded with the suggestion for a 14 storey building at the Lyon Road/ St.Johns Road junction. Even allowing for the lower ground level here than at the southern end of Lyon Road, such a building would be intrusive to residences as far away as Grange Road which, incidentally, are at an even lower ground level. This photo, taken from Grange Road, clearly shows Platinum House. The proposed 14 storey building would be nearly twice as high and thus protrude significantly above the houses opposite the end of Grange Road.		

#### Site 24:Gayton Road

ID	Section / Para	Summary of Comments	Topic / Change	Council Response
9	Site 24: Gayton Road	Why are the buildings on the south only 3- 5 storeys? They should be the higher ones as they are next to the railway and will not over dominate the small scale residential to the north or east.		
10	Site 24: Gayton Road	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan."Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."		Planning permission for development of this site has already been granted, although not implemented. Thames Water was consulted as part of the notification of the application. Any new proposal for the site will be subject to Core Policy CS 1 Z which requires proposals for new development to demonstrate that adequate capacity exists or can be secured both on and off site to serve the development. Being a 'core policy' it is not necessary to repeat this again in the AAP. No change