

REPORT FOR: **CABINET**

Date of Meeting:	20 June 2012
Subject:	Pre-Submission Site Allocations DPD
Key Decision:	Yes [affects All Wards]
Responsible Officer:	Andrew Trehern, Corporate Director Place Shaping
Portfolio Holder:	Councillor Keith Ferry, Portfolio Holder for Planning and Regeneration
Exempt:	No
Decision subject to Call-in:	No
Enclosures:	Schedule 1 - Responses Site Allocations DPD

[Due to the size of the DPD, it has been circulated to Cabinet Members, the Leader and Deputy Leader of the Conservative Group and key officer(s) only. A hard copy has been placed in the Members' Library. The document has been published with the agenda and can be viewed on the website.]

Section 1 – Summary and Recommendations

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

Recommendations:

Cabinet is requested to recommend to Full Council to:

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

Reason: (For recommendation)

To progress production of the Site Allocations DPD in accordance with the adopted Local Development Scheme.

Section 2 – Report

A. Introduction

1. Harrow's Core Strategy was adopted on 16th February and comprises a spatial strategy for growth for the Borough as a whole to provide a minimum of 6,050 new homes¹ and 4,000 jobs over the plan period 2009 to 2026. A major component of the strategy for the delivery of growth is the designation of the Harrow & Wealdstone Intensification Area, to accommodate at least 2,800 new homes and 3,000 jobs. This leaves a requirement to find land for the balance of (at least) 3,250 homes and 1,000 jobs throughout the rest of the Borough.

2. The Core Strategy gives a clear commitment to the protection of all of the Borough's open space and gardens. It therefore sets out to meet development needs on previously-developed land within town centres and in other locations with good public transport accessibility.

3. It is a corporate priority to prepare a Site Allocations development plan document (DPD), alongside other DPDs, to give effect to and support the Core Strategy. A draft compendium of 'preferred option' site allocations was published for consultation during May and June last year, and the outcome of this consultation was reported to the LDF Panel on 19th July 2011. The focus

¹ This incorporates the London Plan (2011) annualised target of 350 homes per annum rolled forward to 2026.

of the LDF team during the second half of the year was the Core Strategy Examination in Public.

4. The recently published National Planning Policy Framework (NPPF) reaffirms the Government's commitment to a plan-led system, but places a clear expectation on local planning authorities to plan positively for objectively assessed growth and development needs. To underline, in particular, the importance that the Government attaches to housing delivery, the NPPF requires local authorities to maintain an annual, rolling five-year supply of deliverable housing sites with an additional 5 per cent (i.e. one year's supply) buffer, and penalises authorities who have historically underperformed against housing targets by increasing the buffer to 20 per cent. In view of the Government's commitment to growth and housing, and the lack of sufficient up-to-date allocated sites on the Harrow proposals map, there is now a pressing need to progress the Site Allocations DPD through the development plan process to adoption next year.

5. It should be noted that the recently published Town and Country Planning (Local Planning) (England) Regulations (2012) applies new terminology to what has traditionally be known as the proposals map. The 'adopted policies map' will replace the Harrow proposals map and will identify the development sites identified in the Site Allocations DPD as well as illustrating geographically the application of policies.

6. This report introduces the 'pre-submission' Site Allocations DPD and explains how its preparation has responded to last year's consultation and the adoption Harrow's Core Strategy (February 2012).

B. Options Considered

7. In view of the Council's commitment, set out in Harrow's Local Development Scheme (LDS) and corporate priorities, to prepare a Site Allocations DPD, and the implications in terms of national planning policy and Core Strategy commitments of not identifying sites to meet the Borough's development needs, the option not to progress with the preparation of the DPD can be discounted.

8. Broad, strategic options for accommodating growth within the Borough were presented and consulted-upon through the preparation of the Core Strategy. The adopted Core Strategy gives a clear undertaking to meet all of the Borough's development needs on previously developed land. Therefore, in terms of sites proposed to be allocated for development, the 2011 consultation draft Site Allocations DPD represented the Council's 'preferred option' by identifying only previously-developed sites which, in the opinion of officers, are deliverable over the plan period and consistent with the objectives of the Core Strategy. The 2011 draft also illustrated proposed changes to retail, employment and open space designations that will require formal amendment to the adopted policies map. The 'pre-submission' Site Allocations DPD has been prepared taking account of responses to the 2011 'preferred option' consultation document.

C. Pre-Submission Site Allocations DPD

9. The pre-submission Site Allocations DPD will be published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (previously 'Regulation 27'). This represents the final stage of consultation, being the version of the DPD that it is intended to submit for Examination in Public, and requires consultees to consider whether the plan meets legal requirements and is 'sound'. The tests of soundness are explained later in this report (see 'Next steps'). It should be noted that site allocations within the Harrow & Wealdstone Intensification Area will be set out in the Area Action Plan and are therefore not included in the Site Allocations DPD.

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

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

11. The following paragraphs summarise and explain the main changes to the site allocations DPD by chapter:

Retail

12. The retail chapter of the 2011 'preferred option' DPD contained the following proposed changes to the adopted policies map:

- modifications to shopping frontages within South Harrow, North Harrow, Pinner and Stanmore district centres, in response to recommendations contained within the Harrow Retail Study (2009) and to correct existing omissions on the proposal map; and
- geographic representation of the neighbourhood parades identified in the (then emerging) Core Strategy; and
- identification of primary shopping areas within South Harrow, Rayners Lane, Pinner and Stanmore district centres, to comply with national policy in (then extant) PPS 4.

13. Few representations were received during the preferred option consultation to the retail chapter. The pre-submission DPD continues to propose the recommended changes to shopping frontages and the identification of the (now adopted) Core Strategy neighbourhood parades. The NPPF continues to require local planning authorities to define the extent of town centres and primary shopping areas. No justification for amending the boundary of any town centre (outside of the AAP area) has emerged, but the

pre-submission DPD continues to propose primary shopping areas in the centres identified².

14. The NPPF advises local planning authorities to ensure that retail and other town centre development needs are not compromised by limited site availability, and therefore requires a suitable range of in centre and (where appropriate) edge of centre sites to be allocated. The focus for substantial new retail and leisure development will continue to be Harrow town centre, consistent with the Core Strategy and the London Plan town centre hierarchy. However, the pre-submission Site Allocations DPD now includes sites suitable for retail development within other town centres, based upon the recommendations³ of the Harrow Retail Study (2009), to ensure a suitable choice of sequentially preferable retail development sites. They are:

- Land between High Street and Love Lane, **within** Pinner district centre (0.31 ha);
- Single storey units south of Rayners Lane station, Alexandra Avenue, **within** Rayners lane district centre (0.11 ha);
- VB & Sons, Kenton Road/Honeypot Lane, **edge** of Kingsbury district centre (0.18 ha);
- Harrow West Conservative Association and Hallmark Cars, Village Way, **edge** of Rayners Lane district centre (0.19 ha);
- Roxeth Library and clinic, Northolt Road, **edge** of centre South Harrow district centre (0.165 ha); and
- North Harrow Methodist Church, Pinner Road, **edge** of North Harrow district centre (0.34 ha).

15. In the case of the High Street/Love Lane and Alexandra Avenue sites, both are located within the proposed primary shopping areas of the relevant centres. In the cases of the sites at Village Way, Northolt Road and Kenton Road/Honeypot Lane, these are classed as edge of centre being within 300 metres of a proposed primary shopping area (in the case of Rayners Lane and South Harrow centres) or of a designated primary shopping frontage (in the case of Kingsbury centre, within the London Borough of Brent). The Site Allocations DPD proposes to downgrade all frontages within North Harrow district centre to secondary frontage status; the site at Pinner Road would be within 300m of the nearest adjacent secondary frontage.

16. All of the above sites, although allocated principally for retail development, will be suitable for a mix of uses which includes residential. Therefore each site has been allocated a potential housing capacity figure based upon the London Plan sustainable residential quality density matrix. For consistency with this approach the Anmer Lodge and Stanmore car park site, which had been included in the housing chapter of the preferred option document, has been moved into this chapter of the Site Allocations DPD. However the size/circumstances⁴ of the Anmer Lodge/Stanmore car park site

² Other town centres are not considered to have significant multiple retail and other roles, and therefore it is not necessary to identify a primary shopping area within them.

³ Only those sites rated in the Study as having a reasonable or good prospect of development within the plan period. Those rated reasonable/poor and poor have been excluded.

⁴ Only the car park is within Stanmore district centre. The total site area is 0.67 hectares.

are such that it will contain a substantial element of housing in addition to the retail/town centre uses proposed.

Employment

17. The employment chapter of the 2011 'preferred option' DPD contained the following proposed changes to the adopted policies map:

- modification of the Honeypot Lane industrial and business use area designation to exclude the extent of the Stanmore Place residential development;
- modification of the Brember Road industrial and business use area designation to exclude the extent of The Arc residential development and to correct the boundary in relation to the South Harrow retail park (Waitrose etc); and
- modification of the Northolt Road business use area to exclude 201-209 Northolt Road, which is located on the residential side of Northolt Road between Brooke Avenue and South Hill Avenue.

18. The north section of the Northolt Road business use area (between Waitrose retail park access and Shaftesbury Avenue) has been the subject of residential conversion/redevelopment schemes in recent years. The pre-submission Site Allocations DPD therefore also proposes to amend the extent of this section of the area to exclude Raebarn House, Templar House and Osbury Court.

19. The potential of office redevelopment to contribute to the provision of new office space and economic diversification through enabling residential use was explored at the Core Strategy's Examination in Public. In response to this (and associated modifications to the Core Strategy) officers propose the following allocations for employment-led mixed use redevelopment:

- Northolt Road business use area north⁵;
- Northolt Road business use area south;
- 415 Burnt Oak Broadway;
- 47-49 Burnt Oak Broadway; and
- 57-59 High Street, Edgware.

20. One consultee has proposed a specific revision to the Northolt Road business use area to exclude from the designation No. 142 Northolt Road (Bovis Lend Lease) on the grounds that the existing building is of poor quality and not attractive to the market, and that de-designation would be the best means of securing successful redevelopment. However, officers consider that Core Strategy objectives for the area would be more effectively met by retaining the site within the designation to allow for a mixed use development to contribute to economic as well as residential uses.

⁵ This replaces an allocation specific to Harrow Police Station that had been included in the preferred option document.

Housing

21. The housing chapter sets out those sites allocated solely or primarily for housing development. It should be noted that sites allocated in other chapters, particularly those relating to retail and employment development, include a housing capacity where the site is expressly identified as being suitable for a mix of uses which includes residential. Strategic previously-developed sites within the Green Belt, identified in a new chapter in the pre-submission DPD, also have housing capacity. These sites will therefore also contribute to housing supply but are not included in the housing chapter.

22. The 2011 'preferred option' DPD proposed to allocate 29 sites for housing development with a projected⁶ capacity to provide 1,369 homes.

23. The following additional sites were put forward by consultees for inclusion as housing sites in the pre-submission Site Allocations DPD:

- Lyon House/Equitable House, Lyon Road;
- Old Lyonians sports ground, Pinner View;
- 37-41 Palmerston Road, Wealdstone;
- Wickes House, Station Road; and
- Kenton Lane Farm, Belmont.

24. Of these sites, those at Lyon Road, Palmerston Road and Station Road fall within the Harrow & Wealdstone Intensification Area boundary and are therefore within the jurisdiction of the AAP rather than the Site Allocations DPD. The Old Lyonian's sports ground is designated open space and so its allocation for development would be at odds with the Core Strategy.

25. Kenton Lane Farm contains an area of designated open space and parts of the farm complex are listed. However, the open space is not currently publicly accessible and a suitable scheme which both secures the future of the historic farm buildings and achieves public access to the open space (subject to no net loss of open space) would make a positive contribution to the delivery of Core Strategy objectives. Recognising the site constraints and the key objective for the site's development - to deliver additional public open space in this area - it is proposed allocate the site in the 'other' rather than the housing chapter of the Site Allocations DPD.

26. Many detailed representations were received in respect of the proposed housing sites in the preferred option document and these are individually dealt with in the schedule attached to this report. The following bullets highlight the main changes to the housing chapter arising from consultee comments:

- Rayners Lane Public House: the potential capacity of the site has been increased to 31 units (up from 20) to reflect recent planning decisions relating to the site, and the text amended to highlight the significance of the listed building.

⁶ Calculated using the London Plan sustainable residential quality density matrix.

- Harrow Arts Centre car park: this site has been removed from the housing chapter and is now allocated for arts and leisure uses to compliment the existing Arts Centre.
- Jubilee House: the site boundary has been extended to include two pairs of semi-detached dwellings to the south (in Merrion Avenue) which the consultee has advised are within the same ownership, enabling a more comprehensive redevelopment scheme to come forward. The site boundary to has also been extended to the north to incorporate land within the ownership of another consultee.
- Canons Park Station car park: this is a new site promoted by a consultee for residential development.

27. The 'preferred option' DPD included 96 Greenford Road as a housing development site, and this has been carried forward into the pre-submission document but the site area has been increased to cover the full extent of the existing timber yard site and to give the correct address as 92-94 Greenford Road. Officers have also included the timber yard at 78-89 Greenford Road as a housing development site.

Strategic Previously-Developed Sites in the Green Belt

28. This is a new chapter which did not appear in the preferred option document, and responds to the adopted Core Strategy, the NPPF and engagement between officers and Harrow School.

29. The Core Strategy identifies four, strategic previously developed sites within the Green Belt. They are:

- Bentley Priory;
- Royal National Orthopaedic Hospital;
- Wood Farm; and
- Harrow College (Harrow Weald).

30. All four sites are of strategic importance because their redevelopment will deliver public benefits. The allocation of these sites therefore gives effect to the Core Strategy and, together with Green Belt policy in the pre-submission Development Management Policies DPD, will ensure that their redevelopment delivers strategic benefits and enhancement of the Green Belt.

31. Having regard to Core Policy CS3 the Council acknowledges a need to plan comprehensively for the future development needs of Harrow School. The school estate is within Metropolitan Open Land (MOL) and is considered for inclusion as a strategic, previously-developed site within MOL. In view of changes to the NPPF and the London Plan position that the same level of protection should be given to MOL as to Green Belt, it is the opinion of officers that there is no policy obstacle to the designation of strategic previously developed sites in MOL. In the case of Harrow School, the site identified is of strategic importance because its redevelopment will provide the opportunity to deliver public benefit in the form of community access to sport and open space facilities. This approach is consistent with the Core Strategy which gives commitments to support the continued operation of Harrow School and to work with landowners in the Harrow on the Hill sub area to support public

access to sport and recreation facilities. At this stage there is no specific proposal for alterations to the school campus but, over the life of the plan, it is considered that there may be a case for managed change linked to a site specific planning brief/SPD. As with the Green Belt, policies will require redevelopment of strategic sites in MOL to maintain and enhance openness and visual amenity. The Harrow School estate is therefore included in the 'other' chapter as a strategic previously-developed site within Metropolitan Open Land.

Open Spaces

32. The open spaces chapter includes details of open space not currently protected which it is proposed to designate, and a number of boundary amendments to existing open spaces, following the completion of Harrow's PPG 17 Study in 2010. The preferred option document also included the following major open space allocations:

- St. George's Playing Field, Pinner View (open space);
- Land rear of 121-255 Pinner Road (local nature reserve);
- Harrow Weald Park, Brookshill (natural/semi natural open space);
- Glenthorne, Common Road (extension to Bentley Priory open space);
- and
- Prince Edward Playing Fields, Whitchurch Lane/Camrose Avenue (community outdoor sports use).

33. In view of recent planning decisions affecting St. George's Playing Field this site has now been relocated to the 'other' chapter and allocated for public open space and enabling housing development. It should be noted however that this chapter also seeks to correct the boundary of the open space designation to take account of the approved development and the extent open space to the north of the site. Additional major open space sites have been included in the pre-submission document in respect of Santway, Stanmore (as natural/semi-natural open space) and land at Brigade Close, Harrow on the Hill (community outdoor sports use) to reflect the full list of suggested 'candidate' sites in the PPG 17 Study.

34. Consultee comments were largely supportive of the proposed open space allocations, with some amendments to the individual site commentaries suggested. In response to consultee comments it is proposed to designate an additional area of open space at the junction of The Grove and Rayners Lane, Pinner.

Biodiversity

35. The biodiversity chapter of the 2011 'preferred option' DPD contained a number of changes to sites designated for their biodiversity value in response to Harrow's Biodiversity Action Plan (2008) and upon the advice of Greenspace Information for Greater London (GIGL). Again, consultee comments were generally supportive and the following changes have been made to the pre-submission Site Allocations DPD:

- revisions to the boundary of the proposed new site of nature conservation importance at Hatch End Arts Centre, to encompass the route of the recently deculverted section of the River Pinn; and
- transfer the relevant parts of the Headstone Manor site of nature conservation importance to the AAP for designation in that DPD.

Other

36. The final chapter of the 2011 ‘preferred option’ consultation document contained the following miscellaneous allocations:

- Whitchurch Playing Fields – for outdoor sports use and flood storage; and
- Belmont Clinic – for medical and community use.

37. Consultee comments supported the proposed allocation of Whitchurch Playing Fields, subject to flooding considerations. Following consultation in relation to the housing chapter, this chapter of the pre-submission Site Allocations DPD now also includes the Harrow Arts Centre site for arts and leisure uses.

38. Officers have amended the pre-submission DPD allocation in respect of St. George’s Playing Field to reflect recent planning decisions and ensure that the approved public open space is delivered in the event of any future revised scheme. In response to the sites put forward by consultees (see commentary on the housing chapter above), the Kenton Lane Farm site is also now allocated in this chapter for enabling development to support the delivery of new public open space in the area, and to secure the future of heritage assets on the site.

39. Harrow’s Core Strategy includes a commitment to provide 3 pitches for Gypsies and Travellers within the Borough and includes policy criteria for the consideration of new sites. No new sites have emerged or been proposed through the preferred option consultation. Therefore, to reflect the importance of the existing site in meeting the Borough’s needs it is proposed to safeguard this as a Gypsy and Traveller site in the pre-submission Site Allocations DPD.

D. Compliance with tests for soundness

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

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

41. In relation to each of these tests:

Positively Prepared

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

43. The Site Allocations DPD gives effect to the Core Strategy by allocating sufficient land to meet identified development needs over the plan period on previously developed land.

Justified

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

45. The evidence base underpinning the Core Strategy also justifies the allocations set out in the Site Allocations DPD. The allocations represent the most appropriate local response to the London Plan and the Core Strategy policies.

Effective

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

47. The allocations have been drafted to ensure that there are deliverable sites which meet London Plan and Core Strategy objectives.

Consistent with national policy

48. The revised Site Allocations DPD takes into account the recently published NPPF, as well as responding to consultee comments wherever possible.

E. Next Steps

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

F. Financial Implications

67. The cost of preparing, publishing and consulting upon the Site Allocations DPD, Development Management Policies DPD and Harrow & Wealdstone Area Action Plan, are provided-for by LDF budget together with a dedicated allocation from Planning Delivery Grant (PDG) funds as set out in

the Council’s Medium Term Financial Strategy. The time table for progression of the three documents has been deliberately co-ordinated to maximise savings associated with simultaneous consultation, submission and Examination in Public.

G. Legal Comments

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

H. Performance Issues

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

I. Environmental Impact

Does the proposal comply with all relevant environmental legislation? Yes

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

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

J. Risk Management Implications

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	To meet the test of ‘soundness’ of DPDs are required to comply with the legal requirements for preparing and consulting on DPDs under the	Officers will seek to ensure compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for consultation. The LDF team will

	Planning and Compulsory Purchase Act.	maintain a log that chronicles legal compliance of the DPDs as they progress towards examination and adoption.
Reform of the plan-making system	The Government has now implemented many of its reforms including the publication, following consultation, of a new National Planning Policy Framework.	The recent publication of the NPPF has enabled the resulting national policy position to be fully reflected in the DPD which it is intended to submit.
Inappropriate consultation responses	A real risk with consultation on the DPDs is that consultees will make representations in respect of matters that have already been dealt with through the Core Strategy and are therefore not up for further debate.	The DPD is clear that the purpose is to give effect to the Core Strategy, including the agreed spatial strategy, which includes the broad distribution and quantum of development to be accommodated, as well as the strategic objectives regarding the safeguarding of specific types of land use, including employment and open space.
Resourcing	The DPD is being prepared and published in tandem. There is a risk that at key stages in the plan making process, resources in the LDF team may not be sufficient to maintain the timetable agreed in the revised LDS.	Officers will monitor the workload in respect of the three DPDs being prepared and will seek to manage peaks or crunch points in the process. However, the workload associated with any one DPD is dependant on the level of community interest, number of responses received to consultation and the complexity of the matters raised. Where necessary, additional staff resources may need to be drafted in for short periods. This will be done in consultation with the Director of Planning and seek to give opportunities to those within the department who may wish to gain policy experience.

K. Equalities implications

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

L. Corporate Priorities

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

- **Keeping neighbourhoods clean, green and safe:** by promoting a better quality built environment and public spaces, and considering options for enhancing green infrastructure and access to open spaces.

- **United and involved communities - a Council that listens and leads:** Engagement with the community and others is at the heart of the LDF process. The Site Allocations DPD responds to the comments received during the 2011 'preferred option' consultation and, by giving effect to the Core Strategy, reflects the many formal and informal stages of consultation undertaken during the preparation of that document.
- **Supporting our Town centre, and local shopping centres and businesses:** The DPD will provide a positive and clear policy framework to guide the future development and growth within town centres and local parades, as well as securing appropriate investment in infrastructure and required environmental improvements.

Section 3 - Statutory Officer Clearance

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

Section 4 – Performance Officer Clearance

Name: Liz Defries	<input checked="" type="checkbox"/>	on behalf of the Divisional Director Partnership, Development and Performance
Date: 23 May 2012		

Section 5 – Environmental Impact Officer Clearance

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

Section 6 - Contact Details and Background Papers

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

Background Papers:

Pre-Submission Site Allocations DPD

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

NOT APPLICABLE

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

Schedule 1: Responses for 'preferred option' Site Allocations DPD (2011)

Person ID	Full Name	Organisation
216113	Miss Rachael Bust	Chief Planner Principal Manager The Coal Authority
517383	David Hammond	Natural England, London & South East Region
539202	Councillor Philip O Dell	Councillor Harrow Council
517392	Carmelle Bell	Thames Water Property (Grd Floor East)
134836	Mr David Sklair	London Borough of Harrow Economic Development
154897	Mrs Anne Swinson	Hatch End Association
154904	Mr David Summers	Chair Greener Harrow
328214	Mr Jed Griffiths	Planning Agent RNOH
517306	Damien Holdstock	Entec on behalf of National Grid
537814	Mr Alan Richardson	
541176	Mrs Jacqueline Raynaud	Elm Park Residents Association
154876	Nick Birbeck	Environment Agency
176136	Giles Dolphin	Head of Planning Decisions Greater London Authority
213615	Mr Brian Murphy	
475851	Dr Brian Tyers	
517086	Claire Hancock	CB Richard Ellis Ltd

Person ID	Full Name	Organisation
517105	Alun Evans	CGMS Consulting
517379	Graham Saunders	English Heritage (London Region)
517416	Teri Porter	CBRE
534313	Rose Freeman	Theatres Trust
541182	Mr Mark Brown	
541542	Ruth Cunningham	TfL (Property)
541869	Roy Warren	Sport England
541880	Sacha Winfield Ferreira	BNP Paribas
541910	Jennifer Kitson	Savills Planning
541956	Tina Khakee	Savills Planning on Behalf of Lend Lease
542487	AAG (HQ)	AAG (HQ)
542490	Preston Bennett Agents for	Cyclescreen Ltd
542503	Preston Bennett Agents for	MP&G Trading
542621	Preston Bennett Agents for	Openscape Ltd
542623	Preston Bennett Agents for	Kenton Lane Farm
54321	RPG Agents for	Old Lyonians Sports Ground

Person ID	Full Name	Section	Para	ID	SA Form	Council Response
216113	Miss Rachael Bust	Site Allocations DPD		SA10	<p>Thank you for consulting The Coal Authority on the above.</p> <p>Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.</p> <p>We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.</p> <p>Alternatively, please mark all paper consultation documents and correspondence for the attention of Planning and Local Authority Liaison.</p> <p>Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).</p>	Noted. The Coal Authority's contact details are retained on our consultation database.
517086	Claire Hancock	Have your say		SA77	<p>It is noted within paragraph 1.1 of the draft SA DPD that "this document allocates sites throughout the Borough but outside of the Harrow and Wealdstone Intensification Area. Sites inside the Intensification Area will be allocated through the Area Action Plan for the Harrow and Wealdstone Intensification Area." Land Securities welcomes this explicit acknowledgement, and subsequent similar references throughout the document.</p>	Noted.

Person ID	Full Name	Section	Para	ID	SA Form	Council Response
134836	Mr David Sklair	Introduction	2	SA51	<p>I am not sure that the way the document is split up into housing, retail etc chapters will help to promote the sites for development.</p> <p>For example, sites H7, H23 appear in the Housing section but are located in a town centre and have potential for mixed use development including town centre uses.</p> <p>Also, the retail chapter only focuses on the designation of primary and secondary frontage and the extent of town centres. There are no sites identified in the chapter.</p> <p>The document could be re-ordered on a geographic basis with all sites included within that area and a separate summary schedule that explains whether the site has planning permission or not, its potential to deliver a number of housing units.</p>	<p>Housing chapter to be re-named as Housing and Mixed Use to reflect the development potential of certain sites.</p> <p>In each chapter, sites are divided by sub area. This will be made clearer in the Pre-Submission version.</p>
154876	Nick Birbeck	Introduction	2	SA92	<p>Thanks you for consulting us on this Development Plan Document.</p> <p>We are please to see there has been some appraisal of flood risk through the site selection. We also welcome the many sites which have been put forward to be protected as open space and the recognition of multi-functional benefits open space can bring in terms of flood risk, biodiversity and climate change.</p> <p>The flood risk sequential test needs to be applied to site allocations to ensure that the sites in areas at lowest risk</p>	<p>Sites will be subject to the sequential test, as set out in the Development Management DPD policies.</p>

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					of flooding are developed first and identify where further flood risk assessment is needed.	
176136	Giles Dolphin	Introduction	2	SA63	The Council are advised that a number of the sites within this document are owned by London Underground. Specific comments on these will not form part of this response.	Noted
517379	Graham Saunders	Introduction	2	SA110	<p>In general we would wish to ensure that each Site Allocation clearly identifies any heritage assets within the site and its surroundings. At present there appears to be inconsistency in how heritage assets are identified and commented upon. We would wish to ensure that all relevant heritage assets designated and others are highlighted and used creatively to inform the development of these sites.</p> <p>We would also highlight the opportunity of using S106 funding to help enhance the historic environment, in particular the significance of heritage assets (PPS5). For example, the redevelopment of sites such as the Kodak Site will generate opportunities for S106 agreements. Part of the funding raised could be used proactively enhance the areas heritage assets such as Headstone Manor (i.e. as match funding with any potential HLF bids). This approach could be used for all of potential development sites, whether identified through the LDF or as a result of windfalls.</p> <p>In addition we would suggest that clarity is given in the commentary on whether any of the sites identified are</p>	<p>All sites will be revisited to ensure heritage assets either on the site or in the vicinity are identified.</p> <p>Where appropriate, commentary will be given as to the best use of the site to maximize any heritage assets</p> <p>Noted. S106 criteria are covered by the Development Management DPD policies.</p> <p>As identified in the Core Strategy,</p>

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					considered appropriate for tall buildings on not. If so, then the scale and form of development considered appropriate for the site should be clearly detailed, supported by robust thorough evidence, in line with CABE/EH Guidance on Tall Buildings (2007). This includes evidence of modelling and analysis of the site, its surroundings and impact upon heritage assets.	tall buildings are only potentially appropriate in the Intensification Area. This document does not cover the Intensification Area. Therefore we are not seeking to allocate any sites for tall buildings through this document.
541542	Ruth Cunningham	Introduction	2	SA76	<p>Please note that the following comments represent the views of officers in Transport for London Corporate Finance - Property Development (TfL CFPD) in its capacity as a significant landowner only and should not be registered as the TfL corporate response.</p> <p>They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this policy document.</p> <p>TfL would wish to promote the land at Canons Park Station Car Park for a residential led mixed use scheme (see attached Plan).</p> <p>In June 2011, the Government published the draft 'presumption in favour of sustainable development' policy which is to be set out in the Government's National Planning Framework document. The definition advises that "there will be a presumption in favour of sustainable development and this will be at the heart of the planning system.... Local planning authorities should plan positively for new</p>	<p>Noted</p> <p>Cannons Park Station will be included in the next version of the Site Allocations DPD for housing development, due to reasons stated, notably high PTAL location. Indicative capacity to be confirmed.</p> <p>It is not however considered suitable for mixed use development as the site is not in a centre or designated parade, and is in close proximity to an existing parade at</p>

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					<p>development and approve all individual proposals wherever possible". A key objective of the Government's Planning Policy Statement 1', emerging 'Planning for Growth' paper and Mayoral Policy and the Unitary Development Plan is the delivery of economic growth. A residential led mixed use development scheme on the sites would complement the surrounding land use, whilst encouraging economic growth in the area. Development of these sites is also likely to act as a catalyst for further development in the area. In short, development on the sites would align favourably with the Government's objectives.</p> <p>In addition, the schemes will deliver residential units, both private and affordable in the Borough which is in line with the Mayor's and Borough's policy objective regarding the delivery of delivering mixed and balanced communities across London.</p> <p>Given that the sites are in close proximity to public transport nodes, development on the sites align favourably with the Mayor's and Borough's policy objectives of reducing the need to travel, this is achieved through the delivery of high quality mixed used schemes in areas served by public transport.</p>	Cannons Park.
541880	Sacha Winfield Ferreira	Introduction	2	SA89	<p>Royal Mail has a number of holdings throughout the Borough, all of which are strategically important. These include:</p> <ul style="list-style-type: none"> ■ Stanmore Delivery Office, 7-8 Honeypot Business Centre, Stanmore, HA7 1NN; 	Noted.

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					<ul style="list-style-type: none"> ■ Pinner Delivery Office/ Crown Post Office, 67 Bridge Street, Pinner, HA5 3JB; and ■ Harrow Delivery Office, Troy Industrial Estate, Harrow, HA1 2ED. <p>All of the aforementioned Royal Mail sites are operational. It should therefore be noted that should any land or property surrounding Royal Mail's operational sites be redeveloped, it would be vital that any new uses be designed and managed, including through the imposition of appropriate conditions/obligations, so that they are both cognisant of and sensitive to Royal Mail's operations.</p>	
176136	Giles Dolphin	Paragraph	2.1	SA64	<p>While it is noted that sites within the Intensification Area will be addressed through the Harrow and Wealdstone AAP, the Council should seek to use this DPD to identify sites in the remainder of the borough that would be suitable for the installation of energy infrastructure to contribute towards mitigating carbon dioxide emissions.</p> <p>Officers note that, as stated within the Council's Core Strategy, Harrow's waste sites will be identified and safeguarded within the West London Waste Authority Joint DPD.</p> <p>TfL wishes to ensure that all sites currently operating with a transport function, or with the potential for transport proposals, are safeguarded in line with draft replacement London Plan policy 6.2.</p>	<p>Noted. The allocation of sites for energy has been investigated. CCHP schemes will be sought in the Intensification Area, which is not covered by this document.</p> <p>Noted</p> <p>All such sites will be safeguarded.</p>

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					TfL would like to reiterate that all sites likely to bring forward development referable to the Mayor of London should be accompanied by a transport assessment and travel plan in accordance with TfL's <i>Transport assessment best practice guidance</i> (2010) in line with draft replacement London Plan policy 6.3.	Noted
517086	Claire Hancock	Paragraph	2.2	SA78	Paragraph 2.2 of the consultation document states that Harrow Council's LDF will include, amongst other documents, a Development Management Policies DPD which "sets out the detailed policies against which planning applications will be assessed." It is considered that it should be made clear that, as per the SA DPD, the policies within the Development Management Policies DPD do not apply to sites within the Harrow and Wealdstone Intensification Area, as policies and proposals for these sites will be included within the emerging Harrow and Wealdstone AAP.	Noted – this will be stated more explicitly.
176136	Giles Dolphin	Paragraph	2.3	SA60	The majority of sites included within this document are of local scale and importance, and do not require any specific GLA comment. Officers note that this DPD is not intended to identify sites and/or proposals within the Harrow and Wealdstone Intensification Area, and that the Harrow and Wealdstone Area Action Plan (AAP) will perform this function.	Noted

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176136	Giles Dolphin	Paragraph	2.3	SA62	Of the strategic sites identified in this DPD, a number have previously come to the attention of the GLA and TfL through consultation on specific planning applications, as part of the development management process. Any future proposals for these sites should respond to the strategic issues raised previously by the GLA. A copy of GLA representations made on planning applications in Harrow is available on the GLA website, here: www.london.gov.uk/mayoral-planning-decision/planning-decisions-relating-lb-harrow	Noted – see comments to individual sites where this is applicable.
475851	Dr Brian Tyers	Paragraph	2.7	SA103	<p>SUSTAINABILITY APPRAISAL OF THE DMP, SITE ALLOCATIONS AND AAP</p> <p>1. CONFLICTING OBJECTIVES IN THE GOVERNMENT'S POLICY</p> <p>1.1 In paragraph 1.2 of the Sustainability Appraisal it is stated that</p> <p>Sustainable development (SD) is at the heart of the planning system</p> <p>and the usual definition of SD is given, i.e. Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.</p> <p>1.2. The Government's four aims are said to be</p>	

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					<p>(i) Social progress</p> <p>(ii) Protecting the environment</p> <p>(iii) Prudent use of natural resources</p> <p>(iv) Maintaining high and stable levels of economic growth and employment</p> <p>It is evident that these aims can often conflict with each other. Economic growth as measured by Gross Domestic Product (GDP) has been pursued by most governments in spite of the fact that the world's resources are finite and that a large population with high levels of overall consumption and increasing life expectancy will eventually exhaust those resources. This is happening in the oceans, with many of the world's fisheries having been over fished. Shortage of fresh water is a problem in some parts of the world and many minerals are becoming scarce and expensive. There are numerous other examples.</p> <p>1.3. If a manager has four aims one of those must be given priority. There can be only one priority; it means <i>in the first place</i> . Most governments including the present Coalition seem to give priority to increasing GDP.</p> <p>As pointed out by Zac Goldsmith MP, major damage to the environment such as is caused by an oil tanker spilling its cargo, will result in legal, clean-up and other expenses which help to increase GDP. The spillage does nothing for social progress and is a waste of natural resources.</p> <p>The fourth aim, is also unrealistic in that the economy is</p>	<p>Noted</p> <p>National Government aims are beyond the scope of Harrow's DPD.</p>

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					<p>cyclic and it is not possible to maintain high, stable growth indefinitely. When the UK had a long period of sustained growth some years ago it ended in the financial crisis of 2007-2008.</p> <p>The Mayor of London's London Plan reflects this pursuit of increasing GDP. The UK economy is heavily reliant on London and the London Plan assumes that its success can continue. However there is some evidence that London will not be able to sustain its present powerful position in financial services; other capitals will take more of the business. It is not possible for Harrow Council, even if it wished to do so, to persuade the Mayor of London and the Government to start moving towards a more rational policy.</p> <p>However if the Council believes in Sustainable Development it should not allow projects to proceed which have a high risk of being unsustainable.</p> <p>2. CLIMATE CHANGE AND THE RISK OF FLOODING</p> <p>2.1 Climate change is happening. There is some disagreement as to the contribution of man but the fact remains that the world's average temperature is increasing so there is more energy in the system. It follows that there will be more extreme events such as severe storms, droughts etc. The South East of England is already designated a water stressed region but there is little doubt that people could survive with much less water than is currently used by cutting out waste. A graver concern, in the author's opinion, is flooding. In November 2010 the Association of British Insurers said that flood claims had</p>	<p>The Sustainability Appraisal will be revisited prior to the next consultation to ensure the allocations in it accord with Harrow's own 16 sustainability objectives.</p>

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					<p>tripled in the last ten years. This was driven by the increases in the number and severity of floods and the growing problem of surface water. 5.2M homes in England are at risk, 2.8M of them from surface water according to the Environment Agency. Assets under flood risk exceed £200Billion. Home insurance premiums have increased substantially this year partly because of many claims for damage caused by severe weather last winter.</p> <p>2.2 It is understood that defences are now designed to cope with a one in 100 year event. Dwellings will be made "resilient" and will be protected by schemes to divert and/or store water in the event of flooding. The recent severe flooding in Cumbria overwhelmed the defences and forced people from their homes for many months. The defences had been in designed to withstand a one in 100 year event and had been in place for only 10 years. A Minister described the flooding as "a one in 1000 year event". Similarly in Japan this year the earthquake and tsunami were much stronger than the designers of the defences had anticipated.</p> <p>2.3 Houses are being built where it is risky to do so. In Tewkesbury, Gloucs. and Queensland, Australia houses were built in the late 20th century where houses had never been built in previous centuries. The occupants of the newer houses paid the price of this folly.</p> <p>2.4 Homes are designed to be "resilient", i.e. it is assumed that that flood water <i>will</i> get in at some future time but recovery will be possible with sufficient time, effort and expenditure. Such homes may become difficult to insure and to sell in a few years. Surely, the only sensible course</p>	<p>All development will be expected to accord with the sequential test as set out in the NPPF, to direct more vulnerable development away from areas of high flood risk.</p>

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					is not to build in regions where the risk is already known to be high.	
176136	Giles Dolphin	Retail	3	SA65	Supported, no specific comments.	Support noted.
541182	Mr Mark Brown	Paragraph	3.11	SA100	<p>Re: 3.11 Proposed neighbourhood Parades</p> <p>I propose a 'Change of Use' designation for one site on Kenmore Road to Retail (Secondary frontage).</p> <p>The site I identify is land next to the new Kenmore Neighbourhood Resource Centre on Kenmore Road, Kenton. There are no shops in this area, and one wonders how far elderly people have to travel to get to a shop (presumably the parade of shops in either Streatfield Rd or Kenton Rd). The patent lack of local retail availability in the area between Kenmore Road and Paulhan Road is crying out for such an opportunity, and there is an argument further justified in terms of reducing car usage as well as local accessibility to retail provision. This would be an exceptional one-off designation, but I feel this is a great challenge for a progressive planning authority to provide for local need where it is identified, however small and exceptional the designation.</p> <p>Please note that I am not proposing that land where the former Kenmore Clinic previously existed should be redesignated for change of use and that it should remain designated for health/social care.</p>	The site is close to Queensbury, and the new Kenton Road Neighbourhood Parade where policies seek to maintain and promote a range of walk to shops and services. These locations are sequentially more preferable for new retail development, than ad hoc sites within existing residential areas. The proposal is not supported by evidence of developer interest to provide a new store in this out of centre location.

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134836	MR David Sklair	Employment	4	SA52	Support the changes to employment site boundaries in chapter 4.	Support noted
517086	Claire Hancock	Paragraph	4.1	SA79	Land Securities welcomes the reference within paragraph 4.1 of the draft SA DPD to the fact that the Council's Pre-Submission Core Strategy provides for the "controlled consolidation of the Wealdstone Strategic Industrial Location (if appropriate) through the Intensification Area."	Noted
517086	Claire Hancock	Paragraph	4.2	SA80	<p>Paragraph 4.2 of the consultation document states, inter alia, that "the Harrow Employment Land Study (2010) identifies a need to maintain employment land to support the continued functioning and development of the local economy, and for this reason existing business use and business and industrial use areas are to be largely retained." It is considered that, for the avoidance of doubt and in recognition of the fact that employment land within the Intensification Area will be considered through the AAP process, "outside the Intensification Area" should be added to the text above, before "...are largely to be retained".</p> <p>Paragraph 4.2 of the draft SA DPD also states that "the extent of the Wealdstone Strategic Industrial Location (Preferred Industrial Location) will be defined in the Area Action Plan for future inclusion on the proposals map and is not considered within the scope of this DPD." Land</p>	<p>Text amended to clarify the scope of the DPD</p> <p>Noted</p>

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					Securities welcomes this explicit acknowledgement.	
541880	Sacha Winfield Ferreira	Existing Extent of the Honeypot Lane Industrial & Business Use Area	Picture 4.1	SA90	<p>We note that the Council are proposing to remove the industrial and business use designation from the northern section of the Honeypot Lane Industrial Area. We do so given that Royal Mail's Stanmore Delivery Office (DO) is located within the Honeypot Lane Industrial Area, directly to the south of the area that is proposed to be removed from the designation.</p> <p>In light of the above, whilst Royal Mail does not object to the proposed change, which is to reflect the Stanmore Place residential development that is currently under construction, we would like to remind the Council that Royal Mail's Stanmore Delivery Office is an operational site. Therefore it would be vital that any new uses are designed and managed so that they are both cognisant of and sensitive to Royal Mail's operations.</p>	Noted
176136	Giles Dolphin	Proposed Extent of the Honeypot Lane Industrial & Business Use Area - area to north removed	Picture 4.2	SA66	The GLA supports the proposed removal of the northern area of the Honeypot Lane Strategic Industrial Location (SIL) designation in order to rationalise, and redefine the SIL boundary, following the strategically coordinated release of industrial land for mixed use development at the site.	Support noted.
541956	Tina Khakee	Existing Extent of Northolt Road Business Use Area	Picture 4.7	SA108	For Bovis House, 142 Northolt Road, Harrow, HA2 0EE On behalf of Lend Lease	

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					<p>Background</p> <p>Our client Lend Lease own and partially occupy Bovis House, 142 Northolt Road, South Harrow.</p> <p>The site is typical 1960's pre-fabricated building stock with an irregular footprint and inefficient layout that was purpose built for Lend Lease. Following a detailed exercise into the potential to retain and improve the existing facilities, our client no longer considers the office space to be a viable option in the medium or long term and is in the process of relocating some staff into one HQ building in Central London</p> <p>The existing premises present a very uneconomical footprint and the building fabric and construction is highly unsustainable. This was confirmed by a recent Building Conditions Survey carried out by Lend Lease Projects. In addition, the site contains a substantial amount of surface car parking around the building, therefore does not optimise floorspace which is an added financial burden for occupiers.</p> <p>Whilst the site is located on a main road, fairly close to an underground station and adjacent to a mix of uses which includes other offices, residential accommodation and retail facilities, the wider area is largely a suburban residential area.</p> <p>All of these factors substantially diminish the potential for the medium and longer term reuse of the building for commercial uses. The alternative is therefore</p>	Noted

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					<p>redevelopment for all or part commercial uses. This option is also considered to provide limited appeal to potential occupiers and or investors.</p> <p>Evolving Policy Position</p> <p>This site is designated within the Northolt Road Business Area in the draft Pre-Submission Core Strategy and in the draft Site Allocations Development Plan Document (DPD) which is the subject of these representations. Lend Lease have made representations to the designation in the draft Core Strategy.</p> <p>The Core Strategy acknowledges that mixed-use redevelopment or conversion of redundant office buildings in the Northolt Road Business Area (NRBA) offers the opportunity to contribute to the housing supply. The Core Strategy also suggests that mixed use schemes should make provision for appropriate economic uses (excluding main town centre uses) on sites within the designation. Lend Lease supports a flexible approach to the reuse of commercial sites, which would be in line with the Government's intentions to ensure that office space which is no longer viable is used to help the shortage in housing supply.</p> <p>However, Lend Lease considers that when assessing the mix of uses on sites within the NRBA, Harrow Council should be mindful of the commercial viability of the mix of uses and take up of space. Additionally, the limited commercial appeal of the NRBA substantially affects the potential for inward investment for commercial uses and</p>	Noted

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					<p>this needs to be borne in mind. .</p> <p>Site Allocations</p> <p>The Site Allocations DPD allocates no 142 Northolt Road within the Northolt Business Area (NBRA).</p> <p>Although the draft Core Strategy suggests mixed use redevelopment may be supported in these locations, the draft policy position requires that employment generating uses should also be retained. The potential lack of flexibility in how this policy is applied could significantly hinder development for the area and in particular Bovis House.</p> <p>It is also arguable that the Council has retained employment allocations without fully assessing the findings of the Harrow Employment Land Review (ELR) 2010.</p> <p>It is noted in the Site Allocations DPD that there is a need to monitor and manage the Borough's stock of employment land. As set out in PPS4, local planning authorities are advised not to carry forward existing site allocations from one development plan to the next. The ELR identifies the need to maintain employment land to support the continued functioning of the local economy, however recognises that a number of changes to the boundaries are needed to reflect current circumstances in relation to these sites.</p> <p>The Northolt Business Area designation has been amended in the draft Site Allocations DPD. Not all of the previous sites have been retained within the business</p>	<p>The findings of Harrow's Evidence Base studies have been interpreted into development management policies, which allow for the release of surplus employment land on a sequentially based approach, starting with non designated sites. Therefore it is not considered appropriate to de-designate this site which is allocated for business use.</p> <p>The Council does recognize that this area suffers from high vacancy rates, and so has therefore designated the whole Business Use Area for employment led, mixed use development, including enabling residential component. The Development Management policies contain a more flexible approach to the uses acceptable on employment land.</p>

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					<p>allocation and these excluded sites were found to contain a mix of uses.</p> <p>No. 142 Northolt Road is not incorporated in the excluded area as shown in the draft Site Allocations DPD.</p> <p>It is considered that Bovis House should be included in the boundary change to the Northolt Road Business Use Area and that the site should be de-designated as business use.</p> <p>Lend Lease's concerns for retaining the site within this designation relate to the site and building constraints and also current market conditions. Their concerns are reinforced by the findings of the Harrow Employment Land Review (ELR) 2010. This ELR is the evidence based report which informs the Core Strategy and Site Allocations DPD.</p> <p>1. Market Conditions & Premises</p> <p>The ELR considers the impacts of the recent recession within the Borough on employment sectors. The ELR concluded that the Borough's office market was experiencing high exposure to vulnerable sectors, high levels of out commuting potentially limiting labour supply, and low levels of economic activity by national standards. In addition, the Borough has some difficulty in attracting larger corporate companies.</p> <p>Whilst the ELR was carried out on a Borough wide basis, these factors are likely to be compounded in the South</p>	

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					<p>Harrow area which is a much less accessible, with fewer services and linked business. Market trends have meant that the Borough is under performing and has high levels of vacancy. This compounds the difficulties with finding commercial occupiers for the site, which has to compete against better located, competitively priced sites.</p> <p>Within the assessment of employment sites in the ELR, no 142 Northolt Road is stated being a "good quality" site. The criteria for assessment include; compatibility of adjoining uses internal environment, the quality and condition of the building, and, attractiveness to the market. The assessment relies heavily on proximity to local services including Waitrose supermarket and public transport links. Notwithstanding this classification, the ELR notes that vacancy levels in the area are high.</p> <p>The premises are poor in quality and unusual in layout. It is located in a mixed use area and backs onto residential premises. Therefore, we do not agree that the site should score highly against these criteria, in which case it is highly questionably that is retained in employment use, even in part.</p> <p>A shift would be required from older outdated space to new space to suit modern business needs, in order for the premises to compete with more modern office space that has come on stream in central Harrow. This would require complete redevelopment which would require a substantial amount of investment. It is unlikely that this would be forthcoming given better located sites within the Borough that are more likely to attract inward investment.</p>	

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					<p>From discussions with commercial agents, it is not anticipated that there would be much interest in the building, given the current condition of the building and off-pitch location. Furthermore, given the mix of uses in the immediate vicinity, the site is under pressure from other uses, which has an impact on land values and makes redevelopment for commercial uses even less likely.</p> <p>In conclusion, the ELR site analysis is based upon strategic and local road access; accessibility to public transport and services. This analysis does not recognise the site difficulties including; compatibility of adjoining uses; internal environment, including the quality and condition of existing buildings; site size and potential development constraints; and attractiveness to the market activity on sites. These are major factors for the longevity for the buildings reuse or reinvestment. A more thorough analysis of the criteria is more likely to show that the building has limited appeal for commercial reuse or reinvestment.</p> <p>2 . Harrow's Office Market</p> <p>Harrow's office market is "unlikely to be fruitful" according to the ELR and this indicates that the commercial appetite to update and modernise or redevelop the building for commercial purposes is unlikely.</p> <p>There are two emerging, more substantial, development sites in the Borough that are better located in terms of accessibility and amenities that are much more likely to be attractive to commercial investors or occupiers. This</p>	

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					<p>includes the Kodak manufacturing site and Civic Centre site. These sites are more preferable locations and benefit from being in central town centre locations and from also having a 'critical mass' to encourage investment. This is recognised in the ELR which states that the better performing office market is in the Harrow and Wealdstone town centres where they have easy access to services and public transport.</p> <p>Harrow town centre has also had substantial new offices delivered in recent months, which provides an existing stock that is better located than South Harrow. It also has the added benefit of proximity to town centre facilities and critical mass of other employment facilities.</p> <p>Although Bovis House may suit local needs for low cost space and smaller-scale activities, this type of office market is generally not performing well and this is reflected by high vacancy rates. In addition, the size of Bovis House site is suited to a large corporate occupier, for which there is limited demand. It is therefore unlikely that the potential to redevelop for potential future occupiers would yield sufficient interest to be realised, nor would there be a practical solution to dividing the building and sharing facilities for a number of smaller firms.</p> <p>The above issues suggest that the South Harrow office market will further contract as commercial activities are drawn to the town centre areas of Harrow and Wealdstone town centres.</p> <p>3. Stock of Office</p>	<p>The findings of Harrow's Evidence Base studies have been interpreted into development management policies, which allow for the release of surplus employment land on a sequentially based approach, starting with non designated sites. Therefore it is not considered appropriate to de-designate this site</p>

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					<p>The ELR advises that a significant supply of office space is vacant. If past development rates continue there is expected to be a large surplus of office floorspace. A broad comparison of estimated demand against supply implies that, for all estimates for future employment requirements, the Borough would appear to have a significant excess of employment space in quantitative terms. The ELR has a net land need of -2.7 ha in the period of 2007-2026.</p> <p>There are clearly preferred commercial locations within the Borough and South Harrow (and the Northolt Road site) is not one of these. There is a real danger that commercial space outside of these preferred locations will remain unoccupied and underutilised for a substantial amount of time.</p> <p>To retain the Bovis House within the Northolt Road Business Use allocation would hinder potential redevelopment for other viable uses and would be a waste of a sustainable brownfield site that could be positively utilised.</p> <p>Whilst it is acknowledged that the Council must balance providing new homes and other uses, with retaining employment opportunities for its residents, it must be realistic about the location and need for commercial land.</p> <p>The medium and long term future of Bovis House for employment purposes is unlikely because of existing vacant and better quality space in better located areas. Therefore the appropriate response in this instance is that</p>	<p>which is allocated for business use.</p> <p>The Council does recognize that this area suffers from high vacancy rates, and so has therefore designated the whole Business Use Area for employment led, mixed use development, including enabling residential component. The Development Management policies contain a more flexible approach to the uses acceptable on employment land.</p>

Person ID	Full Name	Section	Para	ID	SA Form	Council Response
					<p>the site should be de-designated for any commercial use and left to be determined by specific planning merits.</p> <p>Conclusions:</p> <p>The site is considered high quality in the ELR and is therefore retained as employment space in the NRBA.</p> <p>In our view, the sites failings have not been fully understood or assessed, nor as the site been considered in context of better located, better quality sites Additionally, in market terms the area is underperforming, and vacancy rates are high.</p> <p>To give the site the best chance of successful redevelopment and to maximise benefit for the wider area, it should be de-designated for business uses.</p>	
517383	David Hammond	Housing	5	SA11	<p>In respect of new development opportunities and in order to ameliorate issues of deprivation to access to open/green spaces the Council may wish to consider Natural England's ANGST (Accessible Natural Green Space standards), which should be referenced in the Core Strategy for the Borough and a link to this can be included within this document.</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</p>	<p>In respect of the suggestion to reference the ANGST standards, the Council does not consider these standards are applicable to the built up suburban environment of an outer London borough such as Harrow. The Council has established its own standards, having regard to national and London standards, and in consultation with users and service providers, through the comprehensive PPG17 study</p>

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					<p>can be broken down by the following system:</p> <ul style="list-style-type: none"> No person should live more than 300 metres from their nearest area of natural green-space; There should be at least one accessible 20 hectare site within 2 kilometres; <p>There should be one accessible 100 hectares site within 5 kilometres;</p> <ul style="list-style-type: none"> There should be one accessible 500 hectares site within 10 kilometres. 	
541910	Jennifer Kitson	Housing	5	SA91	<p>This document sets out which previously-developed sites are suitable for redevelopment within the borough, whether solely for residential use or as part of mixed use schemes.</p> <p>Early versions of the Core Strategy (Table 2 in Appendix 1 of the Core Strategy Preferred Options consultation draft) recognised the potential of the Lyon House site for residential development. Preapplication discussions with Harrow Council have confirmed that this as part of a mixed use development.</p> <p>The Harrow Site Allocations DPD should reflect this.</p> <p>National planning policies set out in PPS1 and PPS3 stress the importance of the efficient use of land. This is confirmed in the adopted London Plan (2008) Policy 3A.3 ensures that development proposals achieve the maximum intensity of use compatible with local context and public transport capacity. Draft policy 3.4 of the</p>	<p>This DPD only covers sites outside of Harrow's designated Intensification Area. Lyon and Equitable House are located within the Intensification Area, and so are not allocated for this reason. They will be allocated as part of the Area Action Plan DPD, which will allocate sites within the Intensification Area.</p>

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					<p>Replacement London Plan (2009) reiterates this guidance.</p> <p>In light of the national and metropolitan planning policy framework, it is considered that the Lyon House and Equitable House site should be allocated to provide the maximum appropriate number of residential units.</p>	
54321	RPG Agents for Old Lyonians	Housing	5	SA	<p>Please find attached a location plan identifying the Old Lyonians former Sports ground off Pinner View, which we wish to propose as a housing allocation to be adopted in due course as part of the Site Allocation Development Plan Document.</p> <p>A fuller representation in support of the allocation will be submitted when the next public consultation stage for the DPD commences.</p> <p>We trust this is sufficient to register the site for consideration.</p>	Late Submission. The site is not going to be taken forward as it is unsuitable for residential development. It is existing open space, that the Council, as set out in its Core Strategy, wishes to protect, and so is therefore not considered deliverable and is not appropriate to include this site. There is also no evidence of a lack of demand for this facility.
542503	Preston Bennet Agents for	Housing	5	SA124	<p>Our clients own the premises at 37-41 Palmerston Road, in Wealdstone, a site that has been promoted as appropriate for a comprehensive mixed-use development incorporating residential, and that is within documents prepared to inform the emerging Harrow and Wealdstone Area Action Plan (AAP) DPD as being a site identified as a</p>	This DPD only covers sites outside of Harrow's designated Intensification Area. 37-41 Palmerston Road are located within the Intensification Area, and so are not allocated for this reason. They

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					<p>'Potential Development Site'.</p> <p>Despite this identification within the AAP, previous detailed Core Strategy Reqs, and response to the 'Call for Sites', the site has not been included within the Site Allocations DPD. Accordingly, it is considered to be of direct relevance for MP&G Trading to comment on this emerging document, and request that the site at 37-41 Palmerston Road, Wealdstone, is included as an identified site suitable for housing development .</p> <p>Despite being within the defined boundary of the Harrow and Wealdstone Intensification Area, it is considered that the site at 37-41 Palmerston Road responds positively to, and fits within the strategic and local objectives of Borough wide planning policy. As such, it should clearly be identified as a site which is appropriate to deliver redevelopment.</p> <p>The site is currently occupied by a garage and car hire facility, with a parking area to the front, and vacant land behind. A location plan is enclosed, outlining the extent of the site.</p> <p>To demonstrate the site's acceptability, the same criteria-based approach used on sites included within the DPD is set out below:</p> <p>Site Details</p>	<p>will be considered as part of the Area Action Plan DPD, which will allocate sites within the Intensification Area.</p>

Person ID	Full Name	Section	Para	ID	SA Form	Council Response
					<p>Site Area: 0.27ha</p> <p>Existing Use: Car hire and car workshop</p> <p>Number of Homes: Circa 90</p> <p>Other uses Proposed: Appropriate level of commercial use to be retained</p> <p>Representing an under-utilised (sub)urban land opportunity, the site is in single ownership, and is available and deliverable. In coming forward for redevelopment, the site would provide a significant level of mix-use development, with the potential to create a landmark building in line with Intensification Area and Core Strategy recommendations. The site is highly accessible in respect of its proximity to excellent public transport links, with the residential use being an appropriate, complementary and sustainable form of development in this location.</p> <p>The Council are fully aware of the development potential of the site, the principle of which has been previously agreed at two Pre-Application Meetings held with Senior Officers in the Planning Department. The owner is committed to promoting and delivering the site, and has appointed a complete consultant team to move forward to preparing and submitting a planning application.</p> <p>As such, and for the detailed reasons set out above, the site at 37-41 Palmerston Road, Wealdstone, should clearly be included in the Site Allocations DPD as having the potential to provide significant housing within a comprehensive mixed-use redevelopment of</p>	

Person ID	Full Name	Section	Para	ID	SA Form	Council Response
					the site .	
542621	Preston Bennett On Behalf of	Housing	5	SA125	<p>Our clients have an interest in purchasing the premises at 120-128 Station Road, Harrow, a building known as 'Wickes House'.</p> <p>It is acknowledged that the site is located within the identified boundary of the Harrow and Wealdstone Intensification Area, but it is considered appropriate to also promote the site within the Site Allocations DPD. Accordingly, it is considered to be of direct relevance for Openscape Limited to comment on this emerging document, and request that the site known at 'Wickes House' at 120-128 Station Road, Harrow, is included as an identified site suitable for housing development .</p> <p>Despite being within the defined boundary of the Harrow and Wealdstone Intensification Area, it is considered that the site at 120-128 Station Road responds positively to, and fits within the strategic and local objectives of Borough wide planning policy. As such, it should clearly be identified as a site which is appropriate to deliver redevelopment.</p> <p>The site is currently occupied by a single B1 office building, extending to some 30,000 sq ft (gross internal), with parking area to the rear. Located on the east side of Station Road and within the defined Town Centre boundary of Harrow, the building occupies what is a prominent site on the corner of Elmgrove Road, offering</p>	This DPD only covers sites outside of Harrow's designated Intensification Area. Wickes House is located within the Intensification Area, and so is not allocated for this reason. It will be considered as part of the Area Action Plan DPD, which will allocate sites within the Intensification Area.

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					<p>clear potential for redevelopment.</p> <p>The building is currently approximately 70% occupied by a single user. The remainder is vacant. Whilst the current lease runs until 2013, our client, who may potentially acquire the property, will be marketing the property to B1 users in advance of this.</p> <p>The office market in Harrow is not strong at present, and it is unclear how successful this marketing will be in filling the building. It is for this reason that Preston Bennett are instructed to look at other potential uses for the building and site. Part of this is the promotion of the building for other uses in the merging LDF policy framework - it is acknowledged that any allocation would likely be subject to the usual marketing considerations.</p> <p>Given the site's town centre location, and positioning within the Intensification Area, there is clear potential here to provide an appropriate development, incorporating residential in order to meet the Intensification Area housing objectives.</p> <p>Given these objectives, and to ensure a town centre compatible use, a mixed-use development with commercial / retail below residential, would clearly be acceptable in principle.</p> <p>There are also a range of development options available in respect of how this can be delivered. Extending to some 30,000 sq ft, the conversion of the existing building would</p>	

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					<p>be the starting consideration. However, there is potentially scope to add an additional storey atop the existing structure. The site extends to approximately 0.27ha so, if viable, there is also potential scope for a comprehensive redevelopment , addressing the sites prominent location on Station Road and within the Intensification Area, whilst protecting existing residential amenities.</p> <p>To demonstrate the site's acceptability, the same criteria-based approach used on sites included within the DPD is set out below:</p> <p>Site Details</p> <p>Site Area: 0.27ha</p> <p>Existing Use: B1</p> <p>Number of Homes: Unknown. Potentially up to 50.</p> <p>Other uses Proposed: Appropriate level of commercial / retail use to be retained</p> <p>Representing an under-utilised (sub)urban land opportunity, the site would be in single ownership, and is potentially available and deliverable in the medium-term (subject to acquisition and upon expiry of current lease in 2013). In coming forward for redevelopment, the site would provide a significant level of mix-use development, with the potential (if redeveloped) to create a landmark building in line with Intensification Area and Core Strategy recommendations. The site is highly accessible in respect of its proximity to excellent public transport links, with the</p>	

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					<p>residential use being an appropriate, complementary and sustainable form of development in this location.</p> <p>As such, and for the detailed reasons set out above, the site at 120-128 Station Road, Harrow, should clearly be included in the Site Allocations DPD as having the potential to provide significant housing within a comprehensive mixed-use redevelopment of the site .</p>	
542623	Preston Bennett On Behalf Of	Housing	5	SA126	<p>On behalf of our clients Mrs C Edwards and Mr D Brazier, owners of the above site, Preston Bennett Planning have been instructed to review the current Draft Site Allocations DPD, and submit representations on their behalf. Your records will show that these representations follow detailed comments made promoting the site within the context of the emerging Core Strategy DPD, and details having been provided at the time of the previous 'Call for Sites'.</p> <p>Our clients own the premises at Kenton Lane Farm, a former dairy farm at 323 Kenton Lane, Belmont.</p> <p>Despite detailed Core Strategy Reps, response to the Harrow 2010 'Call for Sites' (as well as 2008 London-wide 'Call for Sites'), and detailed discussions with Senior Planning Officers of Harrow Council, the site has not been included within the Site Allocations DPD. Accordingly, it is considered to be of direct relevance for our clients to comment on this emerging document, and request that the site at Kenton Lane Farm, 323 Kenton Lane, Belmont, is included as an identified site suitable for housing development .</p>	This site will be allocated as enabling development to secure the status of the listed buildings and to secure public access to the open space.

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					<p>The background to the site and full justification for its inclusion within the Site Allocations DPD is set out below.</p> <p>Location and Description</p> <p>As can be seen on the enclosed Location Plan, Kenton Lane Farm, also known as "Braziers Farm" named after the Brazier family ownership, is located directly off Kenton Lane and benefits from two existing vehicular accesses.#</p> <p>The site is located within 400m to the south of Belmont Local Centre, which provides a wide range of shops, leisure and community services and facilities. This site is also located on two bus routes and is a highly accessible location, reinforcing its sustainable credentials (Fig 1 – Location Plan).</p> <p>Kenton Lane Farm, as illustrated in Figs 2 and 3, comprises a series of buildings associated with the former dairy and production operation, being previously developed land, enveloped by open space (private no public access), and post-war suburban housing development (Ivanhoe Drive, Tenby Avenue) on land formally part of the Kenton Farm Estate.</p> <p>Planning Policy Context</p> <p>Kenton Lane Farm is not within a conservation area, but does contain a number of listed buildings.</p> <p>An extract of the Council's adopted UDP Proposals Map (Fig 4) is included below which shows that the land comprising the listed building complex, front amenity area,</p>	

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					<p>warehouses and hardstanding is “white land”, surrounded by former “area of open grass” subsequently designated in HUDP 2004 as “Open Space”.</p> <p>It is somewhat of an anomaly as the site has no public access and is privately owned, being only for the use of the occupants of the Farm (less than 6 people presently).</p> <p>The site has the benefit of a lawful existing use certificate as a dairy with ancillary storage, distribution, office, retail and residential (Certificate of Lawful Use – 19.08.99 Ref: EAST/816/98/CLE).</p> <p>Other than the warehouse buildings, used for ancillary storage and quasi distribution, the Grade II farmhouse and associated Grade II farm outbuilding complex has now been vacant for the past nearly three years and their condition and fabric deteriorating in the absence of investment and occupation.</p> <p>Site Allocations Considerations</p> <p>There have been extensive discussions with Planning Officers about the deliverability of this site, which have demonstrated its availability and deliverability, and resulted in the Council accepting the principle for residential development, which would have the dual benefit of enabling the full retention and protection of the Listed Buildings on site, and opening up the currently private open space for public access.</p> <p>A public Exhibition of Pre-Application proposals has been held, and a full consultant team has been assembled by</p>	

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					<p>the owners to prepare and submit a planning application.</p> <p>Using the same criteria-based assessment of sites included within the DPD, the following characteristics should be noted:</p> <p>Site Area: 1.4ha</p> <p>Existing Use: Former dairy and associated buildings with private open space</p> <p>Number of Homes: Circa 3</p> <p>Other Uses Proposed: Inclusion of several workshops in Listed outbuildings.</p> <p>It is noted that the site is not included within the DPD as being identified for any other purpose, and its potential to provide housing is clear. The DPD states that there are no identified sites in Kenton / Belmont. The inclusion of Kenton Lane Farm for circa 35 units will ensure an appropriate and sustainable Borough-wide spread of housing delivery.</p> <p>The inclusion of the site will meet adopted London Plan and emerging Local Planning Policy objectives in seeking to:</p> <ul style="list-style-type: none"> • Meet the strategic housing requirements • Foster sustainable development in accessible locations 	

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					<ul style="list-style-type: none"> • Support Harrow's role within suburban London as a place to live and work • Encourage better access to parks, open space and improve facilities • Achieve sustainable design and energy / carbon reduction development • Encourage development that reduces the need to travel and improve public transport, walking and cycling. <p>The Site's inclusion as an identified site in the emerging Site Allocations DPD would also be supported for the following specific reasons:</p> <ul style="list-style-type: none"> • Opportunity Site: Under-utilised (sub)urban land • Single Ownership • Suitable location for residential development and other ancillary commercial / community (D1) employment uses • Available and deliverable to meet identified shortfall in housing requirement and housing need in the local area and wider Borough • Development Potential in the region of 35 units , to include family sized accommodation (houses) 	

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					<ul style="list-style-type: none"> • This number of units is essential both as ‘enabling development’ and to ensure there will be sufficient funding available for the preservation and regeneration of the existing listed buildings • Opportunity to convert, refurbish and re-use existing listed buildings, bringing them back into effective use (commercial / community) and re-establish the physical ‘model farm’ complex through positive ‘enabling development’ to achieve wider public and heritage asset objectives and benefits • Residential use is appropriate, complementary and sustainable form of development in this established suburban area. The site is in an accessible location to public transport services (bus) and Belmont Local Centre by non-car modes (walking & cycling) whilst protecting and enhancing existing residential amenities • Development of the site will also give rise to the opportunity to re-provide current private open space to publically accessible open space for the local community and future residents. This new public open space provision will complement and link to the established harrow ‘green grid’, assist to further create a sense of place and support the establishment of a sustainable neighbourhood <p>As such, and for the detailed reasons set out above at Kenton Lane Farm, 323 Kenton Lane, Belmont, should</p>	

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					clearly be included in the Site Allocations DPD as having the potential to provide circa 35 houses, including the retention and protection of the Listed Buildings, and creation of publically accessible Open Space.	
537814	Mr alan richardson	Paragraph	5.3	SA49	<p>Why is the Kodak site not included in any of the list of sites deemed suitable for housing? This site is uniquely suitable to take the large-scale housing developments that the Council has identified as becoming necessary for an increasing population. It is a site where tall chimneys etc have long been an accepted part of the landscape and has sufficient space for a number of tall blocks of housing.</p> <p>It would be a dereliction of duty if the Council did not divert to the Kodak site all applicants for tall developments in more sensitive sites.</p>	This DPD only covers sites outside of Harrow's designated Intensification Area. The Kodak site is located within the Intensification Area, and so is not allocated for this reason. It will be considered as part of the Area Action Plan DPD, which will allocate sites within the Intensification Area, including identifying areas suitable for tall buildings.
328214	Mr Jed Griffiths	AMR Potential deliverable sites		SA45	The RNOH is pleased to note that the potential for residential development on parts of its site has been acknowledged (site H19). The figure of 127 dwellings is an indicative total and may be subject to review as a result of future negotiations on the re-development of the site as a whole.	Noted. Agreed – all housing figures included are indicative.
541176	Mrs Jacqueline Raynaud	UDP Proposal sites		SA50	<p><u>Comments regarding proposals by Harrow Council from Elm Park Residents Association</u></p> <p><u>Housing</u> We have great concerns as to the further large developments proposed for Anmer Lodge site, remainder of RAF Stanmore (Douglas Close) along Uxbridge Road</p>	Concern noted. The sites identified in this area stem from the housing

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					<p>(in addition to the large Stanmore Park housing development already in situ), Bentley Priory, Royal National Orthopaedic Hospital, Jubilee House adjacent to Stanmore Station, Boxtree Public House and, assuming there is no development actually on or around Stanmore Station, as well as indicating an intention to rebuild/extend Wolstenholme and Paxfold Care Homes, this makes a total of over 500 new homes. The old AA building (Kingsgate House in Stanmore Broadway) is also currently undergoing a refurbishment into 17 luxury flats which, having insufficient parking of its own, will be using some parking at the rear of The Broadway shops, across a busy road.</p> <p><u>Retail</u> There is also a proposal to develop on The Broadway Car Park in Stanmore to possibly include a supermarket, medical centre and other smaller retail outlets, despite there already being two supermarkets in the town.</p> <p><u>Car Parking</u> Stanmore itself is already desperately short of parking spaces and all these developments will obviously make the situation far worse with the additional residents, workers, delivery lorries, visitors etc. When Sainsburys was built there was already a huge shortfall in the parking needed and Sainsburys had a Section 106 Agreement whereby they paid almost £400,000 to refurbish/rebuild the multi-storey car park behind The Broadway shops. Unfortunately, due to Council delays and lack of progress over the following five years, the Sainsbury's monies (plus interest) was returned to them under the terms of the Legal Agreement. Subsequently</p>	<p>trajectory included in Harrow's Core Strategy. Some of these proposals have planning permission currently.</p> <p>Harrow's Retail Study 2010 identifies the need across the Borough for convenience shopping development. The proposed uses will be revisited when revising the document to ensure they reflect the evidence.</p> <p>The Council is developing a suite of new planning document, including the Development Management policies which included specific policies to manage car parking. Ensuring Harrow has adopted DPDs, backed up by evidence of infrastructure need will ensure that in the future, S106 or CIL receipts will be spent on identified projects.</p>

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					<p>the car park was razed to the ground level only, thus exacerbating an already chronic situation.</p> <p><u>Traffic Congestion</u> Stanmore also suffers a severe traffic-flow problem, so much so that the traffic lights at the junction of Church Road/The Broadway/Stanmore Hill do not include a "green man" phase to enable pedestrians to cross, priority having been given to keeping the motor traffic flowing, and causing a dangerous situation to people crossing, with many near misses, and an unsafe situation for pedestrians at all times</p> <p><u>Stanmore Station</u> On a positive note, we see that there is a proposal to improve the Car Park, which is much needed, and none of which, we trust, will be sacrificed to more housing. An enlargement of this facility would also be beneficial for use on Wembley Stadium event days and of course during and after the 2012 Olympics. We also greatly welcome the suggested improvement to the disabled access both from the main building and the car park, the present arrangements being totally inadequate.</p>	<p>Concern regarding congestion and unsafe crossings will be passed to highways department.</p> <p>Noted. Car parking will managed with TfL to cater for anticipated demand.</p>
517392	Carmelle Bell	Site H1: 1-5 Sudbury Hill, Harrow-on-the-Hill		SA15	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H2: 96 Greenford Road, Sudbury Hill		SA34	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted

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134836	MR David sklair	Site H3: Harrow Police Station, 74 Northolt Road, South Harrow		SA53	Site H3 - site could also include adjacent Royal British Legion building to south west, Telephone Exchange building to North West. It could also link with the (council owned?) housing around Grange Close and Wesley Close. This would provide a much larger site and therefore much greater potential for regeneration/community benefit, subject of course to agreement with current landowners.	Whilst a larger site would be preferable, there has been no response from these landowners from two call for sites, and so they will not be allocated as it can not be demonstrated that the allocation would be deliverable.
517392	Carmelle Bell	Site H3: Harrow Police Station, 74 Northolt Road, South Harrow		SA36	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517105	Alun Evans	Site H3: Harrow Police Station, 74 Northolt Road, South Harrow		SA109	<p>The MPA/S supports the inclusion of Site H3: Harrow Police Station site and its proposed allocation for mixed use residential and economic development within the emerging SSA document.</p> <p>The designation of particular policing facilities for redevelopment allows the MPA/S to implement their Estate Strategy which seeks to rationalise outdated and unfit for purpose facilities. It is pertinent to note that no existing policing facilities will be disposed of until relevant replacement provision has been provided and is fully operational.</p>	<p>Support noted.</p> <p>Harrow Council would welcome discussions to ensure that the needs of the Police in Harrow met.</p>

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517392	Carmelle Bell	Site H4: 205-209 Northolt Road, South Harrow		SA17	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H5: The Matrix Public House, Eastcote Lane, South Harrow		SA41	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell		Picture 5.11	SA37	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H7: Roxeth Library and Clinic, Northolt Road, South Harrow		SA38	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H8: Former Vaughan Centre (part), Wilson Gardens, West Harrow		SA42	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
475851	Dr Brian Tyers	Site H8: Former Vaughan Centre (part), Wilson Gardens, West Harrow		SA104	Sites H8, H10, H20 and H25 are all stated to be in zones of medium to high flood risk. It is submitted that planning permission should not be	Noted – See comments for each individual site.

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					granted for these sites.	
517392	Carmelle Bell	Site H9: 90-100 Pinner Road, Harrow		SA39	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H10: Rayners Public House		SA27	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
154876	Nick Birbeck	Site H10: Rayners Public House		SA93	<p>This site has been identified within the London Borough of Harrow's Strategic Flood Risk Assessment (SFRA) as being within flood zones 2 and 3a.</p> <p>We therefore recommend that developers are required to submit a Flood Risk Assessment (FRA) to the LPA that is in accordance with Planning Policy Statement 25 (PPS25) and the guidance on Site-Specific Flood Risk Assessments (FRA) for Flood Zone 3a within Harrow's SFRA (Section 7.1.1, Pg 31).</p> <p>As the proposed land use is residential and classified as a 'more vulnerable' land use, the Exception test must also be passed. The FRA should also demonstrate that:</p> <ul style="list-style-type: none"> • A sequential approach to site layout has been taken with the most vulnerable uses located in the areas of lowest flood risk within the site. • There will be an overall reduction in flood risk through 	The requirement for a Flood Risk Assessment will be included in the accompanying text

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					<p>resistant and resilient design and construction.</p> <ul style="list-style-type: none"> • The development will not constrain the natural function of the floodplain, either by impeding flow or reducing storage capacity. • Where possible functional floodplain has been restored within the site. • Space has been set aside for Sustainable Drainage Systems (SuDS) which follow the drainage hierarchy in Policy 4A.14 of the London Plan. • Surface water run-off will be restricted to Greenfield run-off rates in line with the aims of Harrow's Pre Submission Core Strategy (Section 4.30). <p>Culverted Ordinary Watercourse (Smarts Brook)</p> <p>There is a culverted ordinary watercourse which runs in close proximity to this site. The exact location of this watercourse should be determined at the earliest opportunity to ensure that no buildings are built over or within 5 metres of its outer walls. Identifying the exact watercourse location will enable any buffer zones or potential restoration to be factored in to the site design.</p> <p>If the culverted ordinary watercourse is actually located within the site boundary then all opportunities to de-culvert the watercourse should be sought and the provision of a minimum 5 metre undeveloped buffer strip provided from the top of bank of the watercourse. This is in line with</p>	<p>Site details to be amended to refer to the Culverted watercourse, and opportunities for de-culverting that should be explored</p>

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					Harrow's Pre Submission Core Strategy and Policy 15 of the Draft Development Management DPD.	
475851	Dr Brian Tyers	Site H10: Rayners Public House		SA105	Sites H8, H10, H20 and H25 are all stated to be in zones of medium to high flood risk. It is submitted that planning permission should not be granted for these sites.	The Rayners Lane Public House site, has been subject to a level 2 SFRA (i.e. informed by a suitable evidence base) and passes the sequential test.
517379	Graham Saunders	Site H10: Rayners Public House		SA111	Site H10: Rayners Public House Commentary - It is noted that a development proposal for this site is currently being considered. However we would seek to ensure that the significance of the Public House (listed building grade II) and its setting is explicitly highlighted as an issue for consideration.	Text amended to highlight the significance of the listed building for any development proposals.
542490		Site H10: Rayners Public House		SA123	The site is included within the Site Allocations DPD (Site Ref. H10) as being a site without planning permission, but where the potential for residential development as part of a wider mixed-use scheme has been identified. The Council will be aware that Outline Planning Applications and a Listed Building Application have now been submitted in respect of the site, which are currently	Noted – Officers are aware of the applications.

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					<p>under determination.</p> <p>Two different mixed-use schemes have been submitted as enabling development, alongside a Listed Building application which will secure the protection of the existing Grade II Listed public house.</p> <p>The two Outline applications propose the following:</p> <p><i>LPA Ref P/1018/11: Construction of a ground floor plus four storey building, with parking spaces, servicing area and refuse storage at lower ground floor level; 801 sq m retail (A1) floorspace at ground floor level; and 28 x 1-bed flats above; and additional use of the public house building (A3 / A4 with ancillary C3 and D2) for the purposes of Use Class D1.</i></p> <p><i>LPA Ref P/1083/11: Construction of a ground floor plus four storey building, with parking spaces, and refuse storage at lower ground floor level; 448 sq m of mixed use floorspace (A1 / A2 / A3 / A5 / B1 / D1) and 3 x 1-bed flats at ground floor level; and 28 x 1-bed flats above; and additional use of the public house building (A3 / A4 with ancillary C3 and D2) for the purposes of Use Class D1.</i></p> <p>As such, it is considered there is a realistic opportunity for a comprehensive redevelopment of the site coming forward in the short term in this sustainable and highly accessible location. This would provide housing development, alongside a mix of other uses, including the full retention of the Listed pub building.</p> <p>As such, Site H10's retention in the Site Allocations</p>	Support Noted.

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					DPD is strongly endorsed, with reference made to the potential to deliver 31 residential units .	
517392	Carmelle Bell	Site H11: Land at Rayners Lane Station, High Worple, Rayners Lane		SA29	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
154876	Nick Birbeck	Site H11: Land at Rayners Lane Station, High Worple, Rayners Lane		SA94	<p>Railway land is identified as likely to be affected by contamination. This site lies directly on a secondary aquifer, the groundwater in which may be in hydraulic conductivity with the chalk principal aquifer. the planning application for this site must include a PRA:</p> <p>Potential for Land Contamination</p> <p>We will need a Preliminary Risk Assessment (PRA) to assess if land contamination may be present at the site. This should be submitted with the planning application. The PRA needs to include information on past and current uses, if sensitive controlled waters receptors are present and if the site could pose a pollution risk. The PRA should also consider if any aspects of the proposed development could pose a pollution risk should contamination be present (i.e. deep drilling to facilitate the installation of foundation piles, site drainage). Further work such as an intrusive site investigation may be required depending on the findings of the PRA.</p> <p>We recommend that developers should:</p>	Amend text to include reference to the need for a PRA

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					<p>1. Follow the risk management framework provided in CLR11, 'Model Procedures for the Management of Land Contamination', when dealing with land potentially affected by contamination;</p> <p>2. Refer to our 'Guiding Principles for Land Contamination' documents for the type of information that should be included in a PRA;</p> <p>3. Refer to our 'Groundwater Protection: policy and practice (GP3)' documents.</p>	
517379	Graham Saunders	Site H11: Land at Rayners Lane Station, High Worple, Rayners Lane		SA112	Commentary - There is a need to ensure that the setting of the Rayners Lane Conservation Area and Rayners Lane Station grade II listed building are explicitly highlighted as issues for consideration.	Text amended to highlight the significance of the listed building and conservation area.
541542	Ruth Cunningham	Site H11: Land at Rayners Lane Station, High Worple, Rayners Lane		SA74	TfL supports the allocation of TfL owned land at Rayners Lane Station Car Park (page 56 and 57 of the document) for a residential led scheme including the retention of car parking if commuter demand supports this. The document suggests that 12 units could be accommodated on the site, however, in the absence of a block and massing study, we are of the view that this figure may be conservative.	Support Noted. Agreed – all figures are indicative, taken from a mid point from the Mayor's density table in the London Plan.
517392	Carmelle Bell	Site H12: North Harrow Library and Children's Services, 429/433 Pinner		SA30	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	

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		Road, North Harrow				Noted
154876	Nick Birbeck	Site H12: North Harrow Library and Children's Services, 429/433 Pinner Road, North Harrow		SA95	<p>The site has been identified as being within Flood Zone 2 within Harrow Strategic Flood Risk Assessment (SFRA).The site should be developed in accordance with the development recommendations made within Harrow's Level 2 SFRA (page 30).</p> <p>The sequential approach to site layout should be adopted and all more vulnerable' development should be directed where possible to those parts of the site within Flood Zone 1.</p>	<p>Noted.</p> <p>The SFRA 2 recommendations will be incorporated into this sites allocation</p>
517392	Carmelle Bell	Site H13: Enterprise House, 297 Pinner Road, North Harrow		SA31	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H14: Rear of 57-65 Bridge Street, Pinner		SA32	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H15: Mill Farm Close		SA14	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
176136	Giles Dolphin	Site H15: Mill Farm Close		SA67	Supported. Officers note that strategic planning	

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					<p>applications for sites H15 (Mill Hill Farm), H17 (RAF Bentley Priory), H19 (Royal National Orthopaedic Hospital), and H25 (Edgware Town FC), have previously been referred to the Mayor of London.</p> <p>Site specific strategic issues have, therefore, previously been set out within the associated GLA planning reports (refer to comment 2 in this appendix).</p> <p>Any future strategic planning applications will be assessed against the London Plan, and considered by the Mayor, as part of the development management process, however, the Council may wish to augment the "<i>Commentary</i>" sections for the above sites with detail from the GLA's planning reports, particularly with respect to any strategic transport issues associated with the sites.</p>	<p>Support noted.</p> <p>Reference to these reports will be included in the document.</p>
154897	Mrs Anne Swinson	Site H16: Harrow Arts Centre car park, library and swimming pool, Hatch End		SA43	<p>Re Housing Allocation in the Pinner and Hatch End Sub Area</p> <p>Ref: H16 (Proposal Site 16) Harrow Arts Centre for 65 dwellings .</p> <p>We are opposed to this proposal site being used for housing. As recognised, the site is very sensitive by being surrounded by Green Belt on two sides; adjacent to Grade !! Listed building (Elliott Hall) and Locally Listed Buildings (Swimming pool and Gymnasium, Art Block and White Cottage in Green Belt). Being adjacent to the new River Pinn, the proposal is within the flood plain.. The river area is now of ecological interest. More parking in the area would be restricted by the Green Belt and the demand for</p>	<p>This site has been removed from the housing allocation section as a result of these concerns, and is re-allocated for leisure / community art uses that preserve the amount of car parking and enhance the existing leisure/art offer.</p>

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					<p>places by the Arts Centre , Library, Swimming pool and the nearby Doctor's surgery (see their planning consent).</p> <p>We would like to add the following observations:</p> <p>Para 5.36 It is disingenuous and inaccurate to say that "no proposals for art and leisure development have come forward over the life of the current or previous UDP's.". The area is Council property and responsibility, and the Council itself has neither proposed nor invited such developments. Moreover, a previous management of the Arts Centre proposed a re-development of the Elliott Hall and adjacent buildings in the curtilage into a significant and substantial L-shaped structure for arts and leisure use, and other improvements, but it was not taken forward. Local residents have argued for an alternative and improved site for the well used library, and reversion of the building to its previous use as a gymnasium or another community facility.</p> <p>The case for housing has never been raised or justified, nor in particular for 65 units and associated parking. If they are built in place of the existing temporary structures to the east of the site, that number would have to be very cramped or on more than one level which would be unacceptable in the context of the listed buildings and adjacent Green Belt. There is no indication how the sensitivity of the site, mentioned above, would be handled.</p> <p>Para 5.37 The car park is not "in poor condition", indeed it was fairly recently re-surfaced and re-marked. It is certainly heavily used in term times and for performances at the Elliott Hall as well events at the swimming pool and</p>	<p>The Site has been included in Harrow's housing trajectory, published in the Annual monitoring Report and referred to in the Core Strategy.</p> <p>The Green belt is not allocated for development. Site boundary to be checked for consistency. Opposition to development on the car park noted.</p>

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					on the adjacent playing fields. Drivers often park in unmarked or banned spaces or drive around waiting for a space or move off to the Morrison's car park, Apart from the removal of temporary, mobile structures, it is not clear what "rationalisation" can be made to increase parking space overall. other than making unacceptably cramped spaces or building a multi-storey structure which would be totally unacceptable immediately in front of the listed Elliott Hall. Finally, the local Green Belt is not for parking! As it was ruled out by the Secretary of State at the supermarket inquiry..	
154904	Mr David Summers	Site H16: Harrow Arts Centre car park, library and swimming pool, Hatch End		SA54	<p>1. The current situation as described in para 5.37 requires updating.:-</p> <ul style="list-style-type: none"> a. Following financial failure, the Arts Centre complex is now re-emerging with a new lease of life under Council management. b. The Elliot Hall building and adjoining building have been refurbished and integrated including a lift. c. The car park is NOT in poor condition. It has relatively recently been renovated - new surfacing, lighting, lines, cycle shelter etc. d. One of the large classroom out-buildings within the red delineated area which was in poor condition has relatively recently been replaced with a new brick structure 	<p>This site has been removed from the housing allocation section as a result of these concerns, and is re-allocated for leisure / community art uses that preserve the amount of car parking and enhance the existing leisure/art offer.</p> <p>The text for this site will be revisited to ensure accuracy with the situation on site.</p>

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					<p>(as shown on site aerial map).</p> <p>e. The swimming pool has relatively recently been refurbished.</p> <p>f. For some time, part of the car park has been taken up by sections of a new prefabricated building - presumably awaiting installation as a replacement for one of the remaining decrepit classroom structures within the red delineated area.</p> <p>2. The car park is generally full to overflowing (overflow to supermarket space permitting) for much of the day / evening throughout the week. If the car park space is reduced, where would replacement / additional parking be located - the supermarket car park is not a suitable location nor is it accessible late evening. Notwithstanding an excellent PTAL, adequate "on-site" car parking is essential for the vitality of this vibrant complex as a whole (Arts, Library, Swimming, adjacent Medical Centre, adjacent sports fields, access to proposed new SINC etc.).</p> <p>3. The site is owned by Harrow Council; the responsibility for the development of the site in line with its UDP designation for arts and leisure development lies with Harrow Council. The need for an enhanced performing arts & cultural centre in Harrow has been expressed by the Community on many occasions and is again being expressed in the Core Strategy and the AAP. Designating</p>	

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					<p>part of it now for housing will severely curtail the utility of the existing facilities and lead again to a financially challenged arts and leisure complex.</p> <p>4. In view of the above, the designation of this site for housing should be withdrawn. Instead the LDF should retain the designation for the whole of this area for arts and leisure development with a master plan to develop the whole of the site (Elliot Hall, outbuildings, Library, Swimming Pool, Medical centre, car park,) as a modern performing arts and cultural centre (incl. replacement library) and fully taking into account all the existing activities in and around this relatively small area which is sensitive to its proximity to the Green Belt and proposed SINC.</p>	
517392	Carmelle Bell	Site H16: Harrow Arts Centre car park, library and swimming pool, Hatch End		SA33	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
154876	Nick Birbeck	Site H16: Harrow Arts Centre car park, library and swimming pool, Hatch End		SA96	There is a culverted ordinary watercourse which runs through this site. The exact location of this watercourse should be determined at the earliest opportunity to ensure that no buildings are built, or planned to be built, over or within 5 metres of its outer walls. Identifying the exact watercourse location will also enable any buffer zones or potential restoration to be factored in to the site design.	Site details to be amended to refer to the Culverted watercourse, and opportunities for de-culverting that should be explored

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					All opportunities to de culvert this ordinary watercourse should be sought. this in addition the provision of a minimum 5 metre undeveloped buffer strip should be provided from the outer edge of any proposed permanent building to the top of bank of the watercourse. This is in line with Harrow's Pre Submission Core Strategy, Policy 15 of the Draft Development Management DPD, recommendations within the London Borough of Harrow's SFRA and the Mayor's London Plan.	
534313	Rose Freeman	Site H16: Harrow Arts Centre car park, library and swimming pool, Hatch End		SA84	The arts centre is Harrow's main cultural offer and includes a theatre. We note the Proposal Site will now exclude Elliot Hall but with regard to our remit above we request that The Theatres Trust is consulted on the planning application for Site H16	Noted – Theatres trust will be notified of any proposals for this site.
517392	Carmelle Bell	Site H17: RAF Bentley Priory, Stanmore		SA26	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	Supporting text to be amended as suggested.

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					fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."	
176136	Giles Dolphin	Site H17: RAF Bentley Priory, Stanmore		SA68	<p>Supported. Officers note that strategic planning applications for sites H15 (Mill Hill Farm), H17 (RAF Bentley Priory), H19 (Royal National Orthopaedic Hospital), and H25 (Edgware Town FC), have previously been referred to the Mayor of London.</p> <p>Site specific strategic issues have, therefore, previously been set out within the associated GLA planning reports (refer to comment 2 in this appendix).</p> <p>Any future strategic planning applications will be assessed against the London Plan, and considered by the Mayor, as part of the development management process, however, the Council may wish to augment the "<i>Commentary</i>" sections for the above sites with detail from the GLA's planning reports, particularly with respect to any strategic transport issues associated with the sites.</p>	Support noted.
517392	Carmelle Bell		Picture 5.35	SA24	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517379	Graham Saunders		Picture 5.35	SA113	Commentary - There is a need to ensure that the setting of the adjoining Kerry Avenue Conservation Area and locally listed Stanmore Station are explicitly highlighted as issues	The conservation area, and listed building will be highlighted as important issues for consideration in

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					for consideration.	the supporting text.
517416	Teri Porter		Picture 5.35	SA85	<p>Brief Background</p> <p>The principle of the site being appropriate for residential development is well-established, given the existence of an extant planning permission for a part two and three storey extension to the existing office building to provide 35 flats (LPA Ref. P/1444/10). Whilst Jubilee House is partly occupied by B1 users, the majority of occupied floorspace is taken up by one business. Moreover, Jubilee House is subject to an increasing vacancy rate. The vendor has confirmed that marketing efforts have failed to attract new occupiers due to the fact that the quality of space fails to meet the needs of potential end-users with this being exacerbated by the weak office market which currently exists in Harrow. A comprehensive redevelopment of the site to provide a residential led mixed-use development is considered to be a realistic opportunity at the site.</p> <p>Our comments in respect of Site Ref. 18 are as outlined below.</p> <p>Site Ref. H18</p> <p>Our client welcomes the Council's inclusion of Jubilee House within the Site Allocations DPD. Jubilee House is a 'non-designated office premises' which provides an excellent opportunity for a high quality residential development at a location which benefits from a number of transport modes. Indeed, following some preliminary feedback from the planning authority, our client is working</p>	<p>Noted</p> <p>Support noted.</p>

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					<p>with the landowner to develop a proposal which should be subject of more formal pre-application discussions over the next month or two.</p> <p>Our proposals are encouraged by the Site Allocations DPD and the planning history associated with the site. Indeed, the emerging DPD notes that planning permission was granted on 27th September 2007 for a two and part three storey extension to Jubilee House to provide 35 flats involving alterations to existing elevations, new landscaping treatment, enhanced car parking layout and cycle storage provision (LPA Ref. P/1220/07). The emerging DPD states that the planning permission has now expired. This is not the case. The planning permission was renewed with a decision being issued on 23rd May 2011 (LPA Ref. P/1444/10). The emerging DPD must be updated to reflect this as it clearly confirms that the principle of residential development in a taller building than currently exists on site continues to be acceptable to the Council.</p> <p>The emerging DPD outlines the Council's view that:-</p> <p><i>"The site is suitable for comprehensive redevelopment, possibly incorporating a mix of uses comprising residential and some replacement office floorspace".</i></p> <p>From a policy perspective, given that the subject site is a non-designated office premises, we would question the need to provide some replacement office floorspace, particularly given the high vacancy rates and the failed marketing efforts that have taken place. Having reviewed the emerging Development Management DPD, there is no</p>	<p>DPD to be updated to reflect the renewal of planning permission.</p> <p>The requirements for additional floorspace need are set out in Harrow's Employment Land Study. It is agreed that this site is not appropriate for replacement offices in line with Harrow's Core Strategy, and this will be reflected in the allocation.</p>

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					<p>policy basis to seek the provision of office floorspace on site. Moreover, Core Strategy Policy CS1 outlines that the Borough's stock of business and industrial premises will be monitored and managed to meet economic needs. Policy goes on to state that surplus stock will be released for other uses in accordance with the sequential approach - non-allocated sites are first on the list for release.</p> <p>The emerging Core Strategy sets out 'Area Objectives' for Stanmore and Harrow & Weald. None of the area objectives listed on page 79 of the emerging Core Strategy suggests that the re-provision of office floorspace is required or indeed key to the success of this sub-area. Indeed, the thrust of the emerging Core Strategy is that employment growth should be focused in the Harrow and Wealdstone Intensification Area. In doing so, this will fulfil the objectives of the emerging Core Strategy by meeting any office demand within existing or redeveloped offices within the Intensification Area as opposed to areas like Stanmore.</p> <p>We have enclosed a red-line plan of the proposed site boundary. This is different to that included within the Site Allocations DPD. The site boundary should include the 4 dwellinghouses on Merrion Avenue which are owned by the vendor and would form part of any comprehensive redevelopment of the site.</p> <p>Summary</p> <p>Having reviewed the Site Allocations DPD in detail and commented on the issues specific to Dandara would be grateful if the suggested amendments and points of note</p>	<p>The site boundary will be revised to include the mentioned dwelling houses.</p>

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					were taken onboard in forthcoming editions of the Site Allocations DPD.	
542487	AAG (HQ)		Picture 5.35	SA122	<p>The site is included within the Site Allocations DPD as being a site where planning permission for residential development has been accepted. Indeed, the principle of the site being appropriate for residential development is well-established, given the existence of an extant planning permission for a part two and three storey extension to the existing office building to provide 35 flats (LPA Ref: P/1444/10 - a renewal of a previous permission for the same development).</p> <p>Whilst partly occupied by B1 users (currently reliant on one business taking the majority of occupied floorspace), there is increasing vacant space within the building. Marketing efforts have failed to attract new occupiers due to the quality of the space failing to meet the needs of potential end-users, and in light of the weak office market which currently exists in Harrow.</p> <p>As such, it is considered there is a realistic opportunity for a comprehensive redevelopment of the site to provide a residential led mixed-use development is considered at the site, at a sustainable and highly accessible location (immediately adjacent to Stanmore Underground Jubilee Line, and with six bus routes stopping in close proximity to the site) and environment already accepted as wholly appropriate for residential development. This would allow for the provision of housing, alongside upgraded</p>	<p>Noted</p> <p>The requirements for additional floorspace need are set out in Harrow's Employment Land Study.</p> <p>It is agreed that this site is not appropriate for replacement offices in line with Harrow's Core Strategy, and this will be reflected in the allocation.</p>

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					<p>commercial space more fit for purpose.</p> <p>In looking at the opportunity of comprehensive redevelopment, the possibility of a wider development site should be considered, incorporating adjacent car park land to the north. This would allow a full redevelopment of the site with a new and enhanced frontage to London Road.</p> <p>As such, Site H18's retention in the Site Allocations DPD is strongly endorsed, as is the commentary at Paragraph 5.43 of the document which states that comprehensive redevelopment could be suitable. The possibility of a wider development site opportunity should be strongly considered.</p>	The site boundary will be revised to include this area, which is in TFL ownership, alongside the four dwelling houses to the south of the site to enable a more comprehensive redevelopment.
328214	Mr Jed Griffiths	Paragraph	5.43	SA46	<p>This is not correct.</p> <p>Replace first sentence with "Outline planning permission P/1220/07 was renewed in March 2010"</p>	Text amended as stated.
517392	Carmelle Bell		Picture 5.37	SA28	<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</p>	Supporting text amended to incorporate the suggested text.

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					<p>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>	
176136	Giles Dolphin		Picture 5.37	SA69	<p>Supported. Officers note that strategic planning applications for sites H15 (Mill Hill Farm), H17 (RAF Bentley Priory), H19 (Royal National Orthopaedic Hospital), and H25 (Edgware Town FC), have previously been referred to the Mayor of London.</p> <p>Site specific strategic issues have, therefore, previously been set out within the associated GLA planning reports (refer to comment 2 in this appendix).</p> <p>Any future strategic planning applications will be assessed against the London Plan, and considered by the Mayor, as part of the development management process, however, the Council may wish to augment the "<i>Commentary</i>" sections for the above sites with detail from the GLA's planning reports, particularly with respect to any strategic transport issues associated with the sites.</p>	Support noted
517379	Graham		Picture 5.37	SA114	<p>Commentary - It is important to stress the need for careful</p>	Noted – when revising the

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	Saunders				consideration of the archaeological interest on this site, as well as the setting of the adjoining listed building and conservation area.	document, attention will be paid to ensuring the text highlights these historical assets.
328214	Mr Jed Griffiths	Paragraph	5.44	SA47	Add "Planning permission was renewed in March 2010, and the PFI scheme for the re-development of the hospital is to proceed."	Amend text as stated.
328214	Mr Jed Griffiths	Paragraph	5.45	SA48	The beginning of the last sentence should be changed to: "The phased proposals will continue to meet policy objectives....."	Amend text as stated.
517392	Carmelle Bell	Site H20: Douglas Close Redevelopment		SA21	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
475851	Dr Brian Tyers	Site H20: Douglas Close Redevelopment		SA106	Sites H8, H10, H20 and H25 are all stated to be in zones of medium to high flood risk. It is submitted that planning permission should not be granted for these sites.	Issues of flood risk will be revisited prior to the next consultation. All developments will be expected to comply with PPS 25s sequential test, and have regard to the outcomes of Harrow's SFRA 2 where relevant.

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517392	Carmelle Bell	Site H21: The Boxtree Public House		SA40	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H22: Land at Stanmore Station, London Road, Stanmore		SA25	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
154876	Nick Birbeck	Site H22: Land at Stanmore Station, London Road, Stanmore		SA97	<p>Table D.1 of PPS25 sets out clear policy aims for development proposals within Flood Zone 1 which asks 'developers and local authorities [to] seek opportunities to reduce the overall level of flood risk in the area and beyond through the layout and form of the development and the appropriate application of sustainable drainage techniques.' The PPS25 Practice Guide strongly recommends that developers consider SuDS at the overall concept stage and make allowances for site topography, site densities and existing overland surface water flow paths.</p> <p>Paragraph F14 of PPS25 asks that LPAs promote the use of SuDS which achieve wider benefits such as sustainable development, water quality, biodiversity and local amenity.</p> <p>Therefore a flood risk assessment for this site should be submitted which demonstrates that the following requirements have been achieved:</p> <p>land has been set aside for SuDS which follow the drainage hierarchy as set out in Policy 4A.14 and meet the</p>	<p>Issues of flood risk will be revisited prior to the next consultation. All developments will be expected to comply with PPS 25s sequential test, and have regard to the outcomes of Harrow's SFRA 2 where relevant.</p> <p>Consideration will be given to adding the requirement for any assessment to include the stated objectives to the supporting text when revising this allocation prior to the next public consultation.</p> <p>Detailed Flood Risk policies are however contained within the Development Management DPD, and so care will be taken to avoid duplication of policies.</p>

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					<p>following goals highlighted in Harrow's SFRA and within the draft Development Management DPD:</p> <ul style="list-style-type: none"> • reduce flood risk <p>reduce pollution</p> <ul style="list-style-type: none"> • benefit biodiversity and landscape <ul style="list-style-type: none"> • surface water run off rates to be restricted to Greenfield run-off rates for all events up to and including the 1 in 100 year plus climate change storm event. <ul style="list-style-type: none"> • on-site surface water storage to be achieved through the use of SuDs to attenuate all events up to and including the critical duration 1 in 100 year event (with an allowance for climate change). 	
517379	Graham Saunders	Site H22: Land at Stanmore Station, London Road, Stanmore		SA115	Commentary - There is a need to ensure that the setting of the adjoining Kerry Avenue Conservation Area and locally listed Stanmore Station are explicitly highlighted as issues for consideration.	These issues will be included in the supporting text
541542	Ruth Cunningham	Site H22: Land at Stanmore Station, London Road, Stanmore		SA75	TfL also supports the allocation of TfL owned land at Stanmore Station Car Park and north of the station (page 78 and 79) for a residential led mixed use scheme with the retention of adequate car parking spaces. However, we would wish to suggest that the site could possibly be split into three parcels of land (see attached Plan) to include land to the north west of the site, this is illustrated in attached Plan. Parcels A and B could accommodate	<p>Support noted</p> <p>The site has been extended to include part A. Part B has been included as part of the Jubilee House allocation to give a more</p>

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					residential development whilst Parcel C could accommodate a residential led mixed use scheme.	comprehensive development opportunity on that side of the station.
517392	Carmelle Bell	Site H23: Anmer Lodge and Stanmore Car Park, The Broadway, Stanmore		SA20	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517379	Graham Saunders	Site SH1: Paxfold, Elizabeth Gardens, Stanmore		SA116	Planning Designations & Commentary - The Grade II Listed Building Church of St William of York should be highlighted as adjoining the site on its south side. Its setting as a heritage asset should be considered as part of any future development proposals on the site.	These issues will be included in the supporting text
517379	Graham Saunders	Site SH3: Wolstenholme, Rectory Lane, Stanmore		SA117	Commentary - There is a need to ensure that the setting of the neighbouring St John the Evangelist (listed grade II*) is explicitly highlighted as issues for consideration	These issues will be included in the supporting text
517392	Carmelle Bell	Site H24: 287-293 Whitchurch Lane, Canons Park		SA18	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H25: Edgware Town Football Club, Edgware		SA22	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	Supporting text to be amended to include the wording as suggested.

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					<p>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>	
517306	Damien Holdstock	Site H25: Edgware Town Football Club, Edgware		SA44	<p>National Grid and Local Development Plan Documents</p> <p>The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:</p> <p>An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).</p> <p>New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).</p> <p>Our gas and electricity infrastructure is sited across the</p>	Noted – ENTEC will be consulted on all DPDs as a statutory consultee.

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					<p>country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.</p> <p>We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:</p> <p>Any policies relating to overhead transmission lines, underground cables or gas pipeline installations Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines</p> <p>Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations</p> <p>Any policies relating to the diverting or undergrounding of overhead transmission lines Other policies relating to infrastructure or utility provision</p> <p>Policies relating to development in the countryside</p>	

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					<p>Landscape policies</p> <p>Waste and mineral plans</p> <p>In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.</p> <p>National Grid infrastructure within Harrow Council's administrative area</p> <p>Electricity Transmission</p> <p>National Grid's high voltage electricity overhead transmission lines / underground cables within Harrow Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:</p> <p>Underground cable from Elstree substation in Hertsmere to St Johns Wood substation in Westminster</p> <p>National Grid has provided information in relation to electricity transmission assets via the following internet link:</p> <p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW</p>	

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					<p>Gas Transmission</p> <p>National Grid has no gas transmission assets located within the administrative area of Harrow Council.</p> <p>Gas Distribution</p> <p>National Grid Gas Distribution owns and operates the local gas distribution network in the Harrow Council area. If you require site specific advice relating to our local gas distribution network then information should be sought from:</p> <p>National Grid Plant Protection</p> <p>National Grid, Block 1, Floor 2</p> <p>Brick Kiln Street</p> <p>Hinckley</p> <p>LE10 0NA</p> <p>plantprotection@uk.ngrid.com</p> <p>Specific Comments</p> <p>The following site identified in the Draft Site Allocations document is located within close proximity to one of National Grid's high voltage underground cables:</p> <p>Site H25: Edgware Town Football Club, Edgware</p>	<p>The proximity of this site to a strategic underground electricity cable will be highlighted in the supporting text.</p>

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					<p>Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times</p> <p>The information supplied is given in good faith and only as a guide to the location of our underground cables. The accuracy of this information cannot be guaranteed. The physical presence of such cables may also be evident from physical protection measures such as ducts or concrete protection tiles. The</p> <p>person(s) responsible for planning, supervising and carrying out work in proximity to our cable(s) shall be liable to us, as cable(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a cable(s).</p> <p>The relevant guidance in relation to working safely near to existing underground cables is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance HS(G)47 "Avoiding Danger From</p>	

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					<p>Underground Services" and all relevant site staff should make sure that they are both aware of and understand this guidance.</p> <p>Our cables are normally buried to a depth of 1.1 metres or more below ground and cable profile drawings showing further details along the route of the particular cable can be obtained from National Grid's Plant Protection Team. Cables installed in cable tunnels, deeper underground, whilst less likely to be affected by surface or shallow works may be affected by activities such as piling. Ground cover above our cables should not be reduced or increased.</p> <p>If a landscaping scheme is proposed as part of the works, we request that no trees and shrubs are planted either directly above or within 3 metres of the existing underground cable, as ultimately the roots may grow to cause damage to the cable.</p> <p>The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact and we believe that successful development can take place in their vicinity.</p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can</p>	

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					<p>be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address below:</p> <p>National Grid's commitments when undertaking works in the UK - Our stakeholder, community and amenity policy</p> <p>Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties</p> <p>A sense of place - Design guidelines for development near high voltage overhead lines</p> <p>Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p>	
176136	Giles Dolphin	Site H25: Edgware Town Football Club, Edgware		SA70	<p>Supported. Officers note that strategic planning applications for sites H15 (Mill Hill Farm), H17 (RAF Bentley Priory), H19 (Royal National Orthopaedic Hospital), and H25 (Edgware Town FC), have previously been referred to the Mayor of London.</p> <p>Site specific strategic issues have, therefore, previously been set out within the associated GLA planning reports (refer to comment 2 in this appendix).</p>	Support noted.

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					Any future strategic planning applications will be assessed against the London Plan, and considered by the Mayor, as part of the development management process, however, the Council may wish to augment the "Commentary" sections for the above sites with detail from the GLA's planning reports, particularly with respect to any strategic transport issues associated with the sites.	
475851	Dr Brian Tyers	Site H25: Edgware Town Football Club, Edgware		SA107	Sites H8, H10, H20 and H25 are all stated to be in zones of medium to high flood risk. It is submitted that planning permission should not be granted for these sites.	Issues of flood risk will be revisited prior to the next consultation. All developments will be expected to comply with PPS 25s sequential test, and have regard to the outcomes of Harrow's SFRA 2 where relevant.
517392	Carmelle Bell	Site H26: Hills Yard and Lockup Garages, Bacon Lane		SA35	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H27: 19 Buckingham Road, Edgware		SA16	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517392	Carmelle Bell	Site H28: 5-11 Manor Road, Harrow		SA19	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability	Noted

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					in relation to this site.	
517392	Carmelle Bell	Site H29: Former Tyneholme Nursery, Headstone Drive		SA23	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Noted
517383	David Hammond	Open Spaces	6	SA12	<p>Natural England welcomes and encourages the provision of Local Nature Reserves together with increasing access to nature and green space. Consideration of links between sites should also be considered where appropriate and possible, providing green chains/corridors.</p> <p>Natural England has recently produced the London Landscape Framework which gives further guidance on the 'natural signatures'. We recommend that you refer to this document and ensure that it is reflected in the Green Grid section of the Core Strategy. The London Landscape Framework can be found at:</p> <p>http://www.naturalengland.org.uk/regions/london/ourwork/ondonnaturalsignatures.aspx</p> <p>The Council should also look at the fragmentation of open spaces and the linking of them back to paths and other sites.</p> <p>Subject to the above Natural England has no further substantive comments to make on this consultation</p>	<p>Support noted.</p> <p>The linkages between sites will be considered as part of the revision of this document, however it should be noted that Harrow is producing a Green Grid strategy which is reflected in Core Strategy policies.</p>

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					document	
539202	Councillor Philip O Dell	Open Spaces	6	SA13	1. The grass verges in Church Lane, Wealdstone, Harrow should be included in the green spaces listings . 2. The grass verges in Enderley Road should be included in the green spaces listings	Identified verges not of sufficient significance to merit inclusion as amenity greenspace and thus were not identified in the PPG17 audit.
176136	Giles Dolphin	Open Spaces	6	SA71	Supported, no specific comments.	Support noted.
213615	Mr Brian Murphy	Open Spaces	6	SA86	Please can the following area be include in the list for recommendation as an open space: Open space with trees at junction of Rayners Lane and Grove Road	This area of open space has been allocated as amenity green space.
517379	Graham Saunders	Open Spaces	6	SA118	For all open space designations we would advised that the London Parks and Gardens Inventory of green spaces and parks is considered and used to inform the following designations and their details. There web site is: http://www.londongardenstrust.org/ . In addition we would suggest that the historic value of the opens paces where known are explicitly highlighted. In the case of the Major Open Spaces details are provided in varying degrees. This is not the case with the Minor Open Space designations. For	Disagree. Greenbelt designation relates to open space policies. Other policies address heritage protection, including historic parks and gardens, conservation areas and listed buildings (including setting considerations). Heritage value of individual open spaces would need to be underpinned by comprehensive assessment, to underpin as robust evidence.

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					example Site OS01: St Mary's Church Yard, Harrow on the Hill, is covered by a number of heritage designations, such as providing the setting to the Church (grade I), include a number of listed structures (e.g. grave stone of Thomas Port – grade II, Lynch Gate - grade II), provides setting to other neighbouring listed buildings (e.g. Harrow School Speech Room – grade II*) and falls within the Harrow on the Hill Conservation Area. These are sensitivities which should be raised in the commentary for all of the Minor Open Spaces where relevant	
517086	Claire Hancock	Paragraph	6.2	SA81	Paragraph 6.2 of the consultation document confirms that "the Council intends to retain and enhance the open space in the Borough, and so there are no proposals to remove any Green Belt, Metropolitan Open Land or other Open Space designation..." It is considered that it would be beneficial to add "outside the Intensification Area" to the end of this quote, in line with the SA DPD's remit to only consider sites outside the AAP boundary.	Text will be amended in this document to clearly identify its remit.
517379	Graham Saunders	Paragraph	6.5	SA119	Site MOS1: St George's Playing Field, Pinner View, Harrow Planning Designation & Commentary - Recognition should be given to the adjoining St George's Hall and Church (both grade II listed buildings) and importance of the open space in providing a setting to these assets.	Supporting text to be amended to include reference to these heritage assets.
541182	Mr Mark	Paragraph	6.5	SA101	I support the extension of the designation of this open space to include the playing field site	

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	Brown					Support noted
517379	Graham Saunders	Paragraph	6.7	SA120	Site MOS3: Harrow Weald Park, Brookhill, Harrow Weald Planning Designation & Commentary - West Drive conservation Area should be explicitly named and commentary given that the open space is an integral part of the areas designation as a heritage assets.	Supporting text to be amended to include reference to these heritage assets.
517379	Graham Saunders	Paragraph	6.8	SA121	Site MOS4: Glenthorne, Common Road, Stanmore Planning Designation & Commentary - For completeness purposes, the grading of Bentley Priory Historic park and garden should be stated (grade II), plus the commentary should recognise the value of this designation, in that this open space has historic interest which should be carefully managed.	Supporting text to be amended to include reference to these heritage assets.
541182	Mr Mark Brown	Paragraph	6.8	SA102	Re: Site MOS4 - I support the redesignation of Glenthorne, Common Road, Stanmore as a new publically accessible area of greenspace, subject to a wildlife survey which determined that there was no rare wildlife present on the site which human encroachment would cause irreversible impact upon.	Support noted. The potential for a wildlife survey will be investigated.
541869	roy warren		Picture 6.9	SA87	<ul style="list-style-type: none"> Site MOS5: Prince Edward Playing Fields, Whitchurch Lane/Camrose Avenue, Edgware Support	Support Noted.

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					The proposed allocation of this site for community outdoor sport is welcomed as this would help safeguard the site for sport and reflects that the site has been developed recently for the Hive Football Academy. The community outdoor sport allocation would also provide a positive policy framework for considering future outdoor sports developments on this site that would enhance the community value of the facilities.	
154876	Nick Birbeck	Paragraph	6.9	SA98	Prince Edwards Playing Fields has a flood storage function. the wording for this site should be changed to reflect this by adopting the same wording used for Site G01:Whitchurch Playing Fields (commentary 8.3) as set out below. 'Further redevelopment will be restricted to the minimum necessary to support outdoor sports use and community access and must not prejudice or adversely affect the role of this site as a flood storage area'.	Supporting text to be amended to reflect the flood storage role of this area.
154904	Mr David Summers	Paragraph	6.25	SA55	Fully support	Support noted.
154904	Mr David Summers	Paragraph	6.26	SA56	Fully support	Support noted.

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154904	Mr David Summers	Paragraph	6.27	SA57	Fully support	Support noted.
154904	Mr David Summers	Paragraph	6.28	SA58	Fully support	Support noted.
176136	Giles Dolphin	Biodiversity	7	SA72	Supported, no specific comments	Support noted.
517086	Claire Hancock	Site BD7: Headstone Manor Recreation Ground - Revised Site of Borough Importance Grade 2	Picture 7.7	SA82	It is noted that parts of the Headstone Manor Recreation Ground are proposed to be allocated as a Revised Site of Borough Importance Grade 2, under site reference BD7. Picture 1.1 of the Harrow and Wealdstone Area Action Plan Issues and Options document that is also currently out for public consultation illustrates the boundary of the Intensification Area, and includes the Headstone Manor site. For this reason, it is considered that any proposals for the Headstone Manor Recreation Ground that include the Headstone Manor site should be considered through the AAP process and should consequently be removed from the SA DPD.	This designation will be revisited when revising the document to ensure there are no duplications between documents.
154904	Mr David	Site BD24: Hatch End Arts Centre - New	Picture 7.24	SA59	1. Fully support with an extension as per item 2.	Support noted

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	Summers	Site of Local Importance			<p>2. Extend to include green area to west and east of original course of River Pinn (shown as a green spike on site aerial map).</p> <p>3. Protection should be given (if it is not already protected) to the landscaped & new tree planted areas adjoining the modified route of the River Pinn from the exit from the culvert under Uxbridge Road, and alongside the western edge of the playing fields, as part of the flood alleviation works?</p>	<p>Extension to be investigated in next SINC review</p> <p>This will be investigated to ensure the area is protected by any appropriate designation if applicable.</p>
176136	Giles Dolphin	Other	8	SA73	Supported	Support Noted
154876	Nick Birbeck	Paragraph	8.3	SA99	<p>We are pleased that it has been stated that development proposals for this site should not prejudice the role of this site as a flood storage area.</p> <p>Harrow's SFRA recommends that the Council should seek to safeguard sites identified for flood storage and alleviation from future development. Therefore development at this site should be resisted.</p> <p>If a Rugby pavillion is proposed at this site or any other development we would expect development proposals to be in accordance with Harrow's site-specific guidance for Flood Risk Assessments in Flood Zone 3a and it would need to be demonstrated that any development proposals would not undermine or endanger the flood defences on the site.</p>	<p>Noted</p> <p>Any development will be expected to accord with PPS25 and Harrow's SFRA. The document will be revised to ensure this is reflected where necessary.</p>

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					Where possible opportunities to improve or increase the level of flood storage provided within this site should be sought. If feasible/appropriate developer contributions could fund such a flood risk management improvement scheme.	
541869	roy warren		Picture 8.3	SA88	<ul style="list-style-type: none"> Site GO1: <i>Whitchurch Playing Fields, Wemborough Road, Stanmore</i> <p>Support</p> <p>The proposed allocation of this site for community sport is welcomed as this would help safeguard the site for sport. The allocation is also an appropriate response to the value placed on the site by the community for sport that has been identified.</p>	Support noted.

