

# Harrow School Supplementary Planning Document (SPD)

## **Consultation Statement**

## Introduction

In accordance with the requirements of the Town and Country Planning (Local Development) (England) Regulations 2012, as amended, this statement sets out the details of the consultation undertaken on the Harrow School SPD and how the main issues raised have been addressed.

**Appendix 1** of this consultation statement outlines the responses by issue and the Council's response to them and lists the persons and organisations who made representations.

Appendix 2 lists the persons and organisations consulted in connection with the preparation of the draft Harrow School SPD.

## Consultation 31 March – 31 May 2015

A draft version of the Harrow School SPD was the subject of public consultation between 31<sup>st</sup> March and 31<sup>st</sup> May 2015. This consultation was extended by five weeks due to concerns with regards to the publicity of the SPD, and the Easter holiday break. In accordance with the Council's Statement of Community Involvement the consultation comprised:

• public notice in the Harrow Times on April 2<sup>nd</sup> 2015 giving details of the draft document, a list of the addresses of local libraries and the civic centre where the document was available for public inspection for the duration of the consultation and the addresses (postal and e-mail) to which representations were to be sent;

• over 800 notification about the draft document were sent by post and e-mail to statutory consultation bodies, other organisations, planning consultants/developers, local groups and individuals on the Local Plans consultation databse on 31<sup>st</sup> March 2015;

• the draft document was published on the Council's main website (planning pages) alongside notification on the Council's homepage under the 'Take Part' banner.

In addition to the above standard methods of engagement (as required by the Council's Statement of Community Involvement), three dropin-sessions were initially scheduled and included: Harrow Town Centre: Thursday 16 April 5.30pm – 7.30pm; Monday 20th April 12.30pm – 2.30pm and the Old Harrovian Room – Harrow School: Thursday 23rd April – 6.30pm to 8pm. A special meeting was also set up for Harrow Hill Forum and the Harrow Conversation Area Advisory Committee.

As noted above, due to concern expressed by residents during the initial five week consultation period that insufficient publicity was undertaken to make people aware of the draft document and consultation arrangements, and so a number of additional actions were taken:

- a. The Consultation period was extended from the original five week period by a further four weeks and therefore finished on the 31st of May (four weeks is the statutory standard for consultations of this nature; with the extension, the period for the draft Harrow School SPD ran for a total of nine weeks)
- b. A further public drop-in session was held on the 14th May at Gayton Library, Harrow
- c. Public notices were placed on lampposts on roads surrounding the School's estate, particularly in the vicinity of the potential development proposals
- d. notifications were delivered to properties on Harrow Hill within the vicinity of the proposed development locations outlined within the SPD

### Main Issues Raised in the Consultation

The responses by issue and the Council's response to them are attached at **Appendix 1**. The following paragraphs summarise the main issues raised.

Many of the responses expressed concern about the arrangements for consultation on the draft SPD. As noted above, the initial arrangements met and exceeded those required under the Town and Country Planning (Local Planning) (England) Regulations 2012; the additional arrangements further exceeded these requirements. Subsequent applications for planning permission will be subject to further consultation as they come forward.

#### The principle and function of a Supplementary Planning Document

Many of the responses queried why an SPD had been prepared and expressed concerns regarding the implications of the document being adopted with respect to future planning applications. Many responses also queried the role of the Council in the process given that the SPD is essentially a masterplan for the School's estate. Some comments also suggested that the SPD should have covered the entire Hill area.

Annex 2 of the National Planning Policy Framework (NPPF) defines SPDs as 'documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development *on specific sites*, or on particular issues, such as design' (emphasis added). The NPPF therefore clearly indicates that it is appropriate for SPDs to be prepared for specific sites. The draft Harrow School SPD supplements Harrow's Local Plan site allocation Site G01, which is one of the largest allocated sites in the Harrow Local Plan, and one with many multi-layered planning considerations (including, for example, heritage, biodiversity, Metropolitan Open Land, operational needs of an educational facility etc). Therefore additional guidance provided by the SPD is considered beneficial.

Furthermore, the supporting text to the Harrow School site allocation clearly indicates that an agreed masterplan will be prepared; the draft SPD forms that masterplan. The Council (as Local Planning Authority) lead on the preparation of the SPD, but the Harrow School was heavily involved as the SPD relates to the School's estate. The majority of the Hill and surrounding area is already covered by SPDs in the form of Conservation Area Character Appraisals and Management Strategies. Additionally, the Core Strategy Local Plan already provides area specific guidance for all of Harrow on the Hill & Sudbury Hill. The scope of the Harrow School SPD is to provide a masterplan for the School Estate (i.e. a specific site, as envisaged in the NPPF), not the entire Hill.

The NPPF indicates that SPDs are capable of being a material consideration in planning decisions but are not part of the development plan. The National Planning Practice Guidance (NPPG) indicates that a material planning consideration is one which is relevant to making the planning decision in question (e.g. whether to grant or refuse an application for planning permission). There is however a distinction between the question of whether something is a material consideration and the weight which it is to be given. Provided it has regard to all material considerations, it is for the Council (as Local Planning Authority) to decide what weight is to be given to the material considerations (such as the proposed SPD) in each case. Whilst the SPD does establish that the principle of the proposed development is acceptable, it does not convey an 'automatic approval' of subsequent planning applications – that concern raised is therefore unfounded.

It should be noted that the SPD does not preclude the school coming forward with applications for proposals that are either not included in the SPD, or differ from the SPD (i.e. in a different location, for example). Such applications would be assessed against the policies contained in the Council's development plan, which includes the London Plan and the Harrow Local Plan. The SPD would be a material consideration to the extent that it is relevant to the proposal. Similarly, works currently occurring on the site should not be seen as pre-empting the outcomes of the SPD, as provided these have the appropriate planning permissions, they can occur notwithstanding the SPD process (a number of representations expressed concern in this regard).

#### New Entrance / Admissions Building

A number of responses expressed concern regarding the proposed new entrance / admissions building on the High Street. Concerns related to the potential impact of such a proposal on the character and views in the area, as well as car parking and access arrangements. In this regard, the draft SPD includes design guidelines for this proposal (and other proposals) that are considered to cover the points raised in the representations; there is scope for some of these to be expanded and strengthened. In terms of traffic impacts and car parking arrangements, the School is intending to commission a detailed transport assessment covering the entire estate. This will help inform the design development of individual projects, as well as considering the cumulative impact of the proposals. This transport assessment will accompany any subsequent planning applications.

#### Highways proposals

A significant number of representations were received against the options for consideration that were posed within the draft SPD to alter the highways arrangements in the High Street in order to improve traffic flows and pedestrian safety. These options included a shared-surface, one-way system, limiting access (to only authorised vehicles, emergency vehicles, pedestrians and cyclists), and alterations to bus routes.

The key areas of objection were that the arrangements would worsen traffic congestion and safety rather than improve it, changes to bus routes would impact upon accessibility and public transport usage on the Hill, impact upon residents and businesses being able to access their properties, and would result in the loss of parking on the Hill. Some alternatives were offered, including pedestrian subways or bridges, and additional road bumps, zebra crossings and safety rails. A small proportion of representations did express support for the share surface arrangements. There were also a large number of objections to the proposals to include Harrow School branding on street furniture in the High Street.

Transport for London responded to the consultation and noted the potential impact on some of its bus operations that could potentially arise from some of the options and indicated that further information and review would be required if any of the proposals were taken further.

Although the various options were mainly highways-related and would be taken forward under the relevant highways legislation, they were included in the draft SPD as they are relevant to the overall masterplan for the School estate, which includes land on both sides of the street.

Given the level of concern raised against the options as a result of the consultation on the draft SPD and that any proposals would in the main be taken forward under the relevant highways legislation, these were removed from the amended SPD. Whilst relevant to the SPD, they are not critical to the delivery of the other projects identified in the SPD.

#### Metropolitan Open Land Swap

The draft SPD identified the potential to include the proposed landscaped core extending from the Chapel to the sports fields in Metropolitan Open Land (MOL). Doing so will protect this core landscape from future development and will also serve to offset the proposed loss of MOL as a result of the proposed new Sports Centre and Music Centre. A significant number of the representations received objected to the principle of a 'land swap', as well as questioning the openness and value of the proposed landscape core (i.e. the potential replacement MOL), having regard to the existing and proposed buildings in the vicinity of this core on the openness, as well as the quality of the potential replacement MOL. Others felt that the need to build on MOL could be avoided by using sites already containing buildings (i.e. rebuilding the Sports Centre on the current Sports Centre site).

The draft SPD identified the principle of a MOL land-swap in the context of the overall master plan for the School Estate. This was in a general sense, having regard to the extent of proposed new buildings and those proposed to be removed. It does not formally agree any land swap. Detailed consideration as to whether a land swap is acceptable will occur when formal planning applications are made and would be subject to a s106 planning obligations agreement and subsequently included in any Local Plan review. In response to these concerns, additional text was included in the amended SPD to clarify the considerations that will be taken into account for the principle of a land-swap to be taken forward into actual reality.

The primary function of Metropolitan Open Land is its openness, rather than 'quality'. Area of MOL to be displaced to accommodate the new buildings is less than the size of two tennis courts, which is de-minimus in the context of the +300ha of MOL designated in the School's estate. Nevertheless the School's masterplan proposes a no net loss of MOL and makes provision for the reconfiguration of MOL to create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the upper parts of the Hill itself, thereby protecting the openness of that part of the site and its strong link with the top of the Hill. The 'quality' of the MOL would also be enhanced, as it would be extensively landscaped and form part of the overall landscape structure of the site. The new Sports Centre, whilst proposed to be located on existing MOL, will serve to improve the openness of MOL elsewhere on the site by enabling the rationalisation of smaller sports related buildings scattered throughout the playing fields.

The Greater London Authority (GLA) has advised that 'on the basis that the SPD advocates an approach that would result in "no net loss in the amount or quality of MOL", and that the reconfiguration would deliver a coherent and contiguous expanse of MOL (and an anticipated net gain in MOL) GLA officers are satisfied that the SPG *(sic)* is in general conformity with the London Plan'.

For operational and construction reasons, it is not practical to rebuild the Sports Centre on the existing site; this would leave the school and external users without a Sports Centre for at least two years. Other suggested sites included Peel House, which is proposed to be demolished. However, the demolition of Peel House is integral to the proposal to create a landscaped core and open-up views along this. Locations further up the hill are also in greater proximity to Listed Buildings, and could cross into the Conservation Area.

#### Pitch and Putt

A significant number of representations as well as a petition (hard copy and online and containing over 2,000 signatures) objected to proposals to build all-weather sports pitches and coach parking on the site currently occupied by the Harrow Hill Golf Club. This land is owned by the School and is leased to the occupier on a short-term basis. When under the School's management, that area was used as playing pitches.

Key grounds for objection raised included the proposal being inappropriate on MOL, the impact of the proposals on the openness of MOL, Area of Special Character, site of importance for nature conservation, flooding, trees, traffic and the loss of the golf course / café as a local business and amenity.

The London Plan and Harrow Local Plan indicate that appropriate development within Metropolitan Open Land should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. Both the astroturfing and the coach parking are associated with the use of the site, and the wider MOL estate, for outdoor recreation. One of the primary considerations with respect to development on MOL is the impact of the development on the openness of the land. Coach parking and all-weather pitches (including astroturfing), whilst hard-standing, will maintain the openness of the site and are associated with outdoor recreation, an appropriate use of MOL land.

The Council's Local Plan indicates that the strategic value of the Harrow on the Hill Area of Special Character is 'the prominence that the Hill provides to the historic hilltop settlement, particularly St. Mary's Church and historic Harrow School buildings ... the boundaries of the Harrow on the Hill area of special character take in playing fields and other spaces which form Metropolitan Open Land around the hilltop settlement'. Consequently, the strategic value of the area of special character proposed to be used as all-weather pitches and coach park is its function as Metropolitan Open Land, namely its openness. As noted above, the proposed use of the site for an outdoor recreation use and associated coach parking is an appropriate use in MOL.

A transport assessment will be required to accompany any planning application; this will assess the impact of the proposal on the surrounding road network. The provision of coach parking at this location should reduce the number of vehicles using streets on the Hill itself. As stated above, the school intends to commission an Estate-wide transport assessment that will consider the overall impact of the SPD proposals on the transport network.

The land on which the pitch-and-putt and café is located is leased from Harrow School on a short term tenancy. The Council's Local Plan indicates that the loss of an existing sport facility will be permitted if there are adequate similar facilities within walking distance which offer equivalent provision. There are a number of other golf courses within the borough, including Stanmore Golf Club and Pinner Hill Golf Club, with several others just outside the borough (i.e. Playgolf, Watford Road, 0.7 miles from the subject site). Operational aspects such as membership arrangements, ability of players (i.e. beginners etc) are outside the scope of the planning system. Furthermore, NPPF

paragraph 74 accepts that the loss of one outdoor recreation use may be acceptable where the development is for alterative sports and recreation provision, the needs for which clearly outweigh the loss.

The café is ancillary to the use of the site for outdoor recreation and unlike outdoor recreation; its retention is not specifically sought by the policies contained in the Harrow Local Plan. There may be scope for the re-provision of the café as part of any building associated with the proposed all-weather pitches.

Detailed issues relating to matters such as biodiversity, flooding and impact of any potential floodlighting will be addressed at the time any application for planning permission is received.

Many of the issues raised against the proposals for Zone B / the Harrow Hill Golf Course site will be considered more fully as part of detailed design and technical assessments that are currently not available as part of the SPD process (as it is an overarching master plan rather than detailed proposals). However, given the substantial concern raised in the representations and petition with regards to the proposals, these were removed from the adopted document. This will enable more comprehensive proposals for the site to be drawn up, including detailed designs for actual buildings and the layout and scale of any sporting facilities and coach parking. Such information should more fully address the concerns raised in the representations and petition but will necessarily take more time and will go into a level of detail beyond that considered appropriate in an SPD. Such work would be progressed by the School as a separate body of work and form the basis of any future planning application. Deleting the proposals from the SPD enabled the SPD to progress to adoption to provide the overarching masterplan and guidance for the remainder of the proposals, the bulk which are Zone A, are intended to be progressed in the next 0-5 years and not dependent on Zone B. The draft SPD identified development of the all-weather pitches / coach parking as part of the 5-10 year phase of the SPD masterplan, coinciding with when the lease to the current Harrow Hill Golf Course expires.

It is considered that the removal of the proposal does not impact upon the appropriateness or implementability of the remaining proposals within the SPD. Removal of the proposal from the SPD does not prevent the School submitting an application for planning permission for all-weather pitches and coach parking at a future time; such an application would be assessed against the development plan at the time (i.e. the London Plan and the Harrow Local Plan).

#### General

A number of representations considered that the proposals in the SPD would have an impact upon rights-of-way that pass through the site. The proposals are not considered to have a direct impact upon any rights-of-way, as defined by the borough's 'Definitive Map'. In this regard, rights-of-way have been included on Figure 2 (Designations) to enable this point to be evident to anyone using the document.

Comments were received in relation to ensuring / securing public access to the proposed facilities (i.e. sporting / cultural). The SPD notes the existing external use of many of the facilities on the site and recognises that many of the new facilities will benefit existing users, as well as providing capacity to accommodate greater local school and community use, especially the proposal for a training pool and expanded

sports centre. The extent of access to the new facilities will form part of the assessment of and negotiation on the detailed planning applications for these facilities.

#### Statutory consultees

Statutory consultees were notified of the draft SPD in accordance with the Regulations. Responses were received from Brent Council, Transport for London, the Highways Agency, Historic England, Natural England, Heathrow Airport and Thames Water. The points raised by these consultees are outlined above.

## Amendments in response to representations

In light of the representations received and the Council's response to them (summarised in Appendix 1 below) the following amendments to the document were made to the draft document before adoption:

- (a) Additional text clarifying the rationale for the SPD and its role as a 'material consideration' in the determination of planning applications.
- (b) Inclusion of rights-of-ways that pass through the site on Figure 2 (Designations) and clarification in the text that none of the proposals within the SPD have a direct impact on any rights-of-way.
- (c) Removal of the potential options for changes to the public highway in the High Street.
- (d) Clarification of process of taking any 'MOL land-swap' forward, including the matters that will be considered.
- (e) Clarification of the nature of some of the proposals as a number of representations appeared to misunderstand the nature of these.
- (f) Strengthening of the design guidelines included in Section 6 in response to representations where appropriate.
- (g) Removal of the Pitch and Putt (Harrow Golf Site) from the SPD
- (h) Minor changes with respect to dates and consistency with terminology (i.e. SPD / masterplan)

It should be noted that some additional, or minor, modifications to the SPD have also been made. These are minor changes that have been made to provide clarity, improve grammar, spelling corrections and factual changes where needed.

# Appendix 1 – Issues Raised and Council's Response

The table below summarises the comments received during the consultation and provides the Council's response.

Respondents Comments by Issue	Council's Response / amendments to draft document
Zone B – Golf Course / Pitch and Putt Site	
Objections - inappropriate use for Metropolitan Open Land due to coach parking and astroturfing	The London Plan and Harrow Local Plan indicate that appropriate development within Metropolitan Open Land should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. Both the astroturfing and the coach parking would be associated with the use of the site for outdoor recreation, and the coach parking itself would serve outdoor recreation across the estate (i.e. cricket pitches, rugby pitches etc). One of the primary considerations with respect to development on MOL is the impact of the development on the openness of the land. Coach parking and all-weather pitches (including astroturfing), whilst hard-standing, would maintain the openness of the site and are associated with outdoor recreation, an appropriate use of MOL land. Design guidelines (Section 6) could be re-enforced to ensure design / layout takes into account MOL / openness. Notwithstanding this, in the context of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD.
Objections due to the impact on the areas of special character and amenity of replacing landscaped golf course with astroturf pitches and coach park	The Council's Local Plan indicates that the strategic value of the Harrow on the Hill Area of Special Character is the prominence that the Hill provides to the historic hilltop settlement, particularly St. Mary's Church and historic Harrow School buildings the boundaries of the Harrow on the Hill area of special character take in playing fields and other spaces which form Metropolitan Open Land around the hilltop settlement'. Consequently, the strategic value of the area of special character proposed to be used as all-weather pitches and coach park is its function as Metropolitan Open Land, namely its openness. As noted above, the proposed use of the site for an outdoor recreation use and associated coach parking is an appropriate use in MOL. Any detailed proposals

Respondents Comments by Issue	Council's Response / amendments to draft document
	would need to be accompanied with landscape proposals, including the identification of trees to be retained, in accordance with Policy DM22 (Trees and Landscaping). Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.
Concern with regards to the impact upon traffic due to coach parking	A transport assessment would be required to accompany any planning application; this would assess the impact of the proposal on the surrounding road network. The provision of coach parking at this location should reduce the number of vehicles using streets on the Hill itself. The school is proposing to commission and Estate-wide transport assessment that will consider all of the proposals in their entirety; reference could be made to this in the SPD. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.
Objection as there would be adverse impacts on Biodiversity as it is a site of importance for nature conservation and astroturfing and coach parking would conflict with this. Concern with regards to the loss of trees, which can also play a role in mitigating flooding	The draft SPD identifies biodiversity and the site's designation as a Site of Importance for Nature Conservation as considerations that would need to be adequately addressed when detailed application for planning permission is made. The highest quality biodiversity areas on the site are the vegetated areas on the boundaries of the site and there is scope for these to be retained and enhanced (through an improved management regime) as part of any detailed proposal. Design guidelines (Section 6) could be re-enforced to ensure design / layout takes into account existing trees (particularly those on the perimeter of the site), as well as sustainable drainage principles. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD.

Respondents Comments by Issue	Council's Response / amendments to draft document
Objection to the loss of the Café as it is a valued local business	The land on which the pitch-and-putt and café is leased from Harrow School, with the lease due to expire September 2019. The café is ancillary to the use of the site for outdoor recreation and unlike outdoor recreation; its retention is not specifically sought by the policies contained in the Harrow Local Plan. There could be scope for the re-provision of the café as part of any building associated with the proposed all-weather pitches. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.
Objection to the loss of a valued public amenity and open space	Both the existing use of the site for a pitch-and-putt and the proposed use for all-weather playing pitches are 'outdoor recreation' uses that are appropriate within MOL, consequently there is no loss of open space. The site is in private ownership; however the proposed all-weather pitches would be made available for community use when not required for use by the School. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.
Objection as the proposed use could increase the risk of flooding on Watford Road due to extensive tarmacking	Consideration would need to be given to incorporating sustainable drainage systems into any detailed design for the pitches and surrounding area, in accordance with Local Plan policies DM9 (Managing Flood Risk) and DM10 (On Site Water Management and Surface Water Attenuation). Artificial pitches and coach parking can be constructed using materials that are permeable, thereby reducing the impact of the proposals on surface water flooding. Additionally, there is scope to include other sustainable draining measures within the site, such as swales and soakaways. Section 6 (design guidelines) could include specific reference to the design, layout and use of materials being required to take into account sustainable design principles. There is a significant level difference between Watford Road and adjoining part of the site.

Respondents Comments by Issue	Council's Response / amendments to draft document
	Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.
Objection to floodlighting for the astroturf pitches due to amenity impacts and potential impacts on wildlife such as bats	The draft SPD does not include reference to floodlighting. Any application for planning permission involving floodlighting would be assessed against Policy DM48 (Enhancing Outdoor Sport Facilities), which indicates that 'proposals for floodlighting will be supported where it would enhance sport facilities and would not be detrimental to the character of the open land, the amenity of neighbouring occupiers nor harmful to biodiversity'. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD.
Trees on boundary of site should be retained, and improvements made to the Watford Rd and additional planting should take place to mitigate biodiversity loss and flood risk. Woodland management plan should be bought forward if astroturfing goes ahead.	Any application would be subject to an aboricultural implications survey prepared under BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations. Implications for biodiversity would be considered against Policy DM20 (Protection of Biodiversity and Access to Nature), which identifies that the design and layout of new development should retain and enhance any significant existing features of biodiversity within the site. Section 6 (design guidelines) could make specific reference to retaining perimeter trees). Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.
The change to astroturf and parking will adversely impact on the surrounding residential properties outlook and amenity	The overall openness of the site would be maintained, in accordance with the site's Metropolitan Open Land. The National Planning Practice Guidance (NPPG) makes it clear that 'planning is concerned with land use in the public interest, so that the protection of purely private interests such as the impact of a

Respondents Comments by Issue	Council's Response / amendments to draft document
	development on the value of a neighbouring property or loss of private rights to light could not be material considerations. Consequently, private views (i.e. outlook) are not a material consideration for planning applications. Amenity issues would be assessed when a detailed planning application was made. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. <b>Change – remove the proposal for all- weather pitches and coach parking from the draft SPD</b>
Objection to the loss of the golf course use, as it is a unique community facility open to all.	Policy DM47 indicates that the loss of an existing sport facility will be permitted if there are adequate similar facilities within walking distance which offer equivalent. There are a number of other golf courses within the borough, including Stanmore Golf Club and Pinner Hill Golf Club, with several others just outside the borough (i.e. Playgolf, Watford Road, 0.7 miles from the subject site). Operational aspects such as membership arrangements, ability of players (i.e. beginners etc) are outside the scope of the planning system i.e. does not have land use impacts. Furthermore, NPPF paragraph 74 accepts that the loss of one outdoor recreation use may be acceptable where the development is for alterative sports and recreation provision, the needs for which clearly outweigh the loss. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. <b>Change – remove the proposal for all- weather pitches and coach parking from the draft SPD.</b>
Suggestion that adjacent playing pitches could be used for this proposal, with access from Watford Rd	Previous discussions regarding access off Watford Road have indicated that Transport for London would be reluctant to agree to such an access, particularly when there are other alternative access routes. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD. Change – remove the proposal for all-weather pitches and coach parking from the draft SPD.

Respondents Comments by Issue	Council's Response / amendments to draft document
No need for coach parking on this site – Garlands lane could be widened and the School's car park at the bottom of this road is adequate	Garlands Lane has many of the planning designations that also cover the proposed location for the coach-parking (i.e. Area of Special Character, Site of Nature Conservation Importance, and Metropolitan Open Land). It however also has additional designations such as being included in a Conservation Area and an Archaeological Priority Zone and is therefore more constrained in planning terms. Additionally, it is likely to be difficult to physically accommodate the widening of Garland Road, particularly in the vicinity of existing buildings. The car park at the end of the road is unlikely to be able to accommodate a significant number of coaches, and manoeuvring would be difficult. It would also result in the loss of parking for cars and not have the benefits of locating the coach parking on the proposed sites, such as reducing the need for coaches to traverse the Hill. Notwithstanding this, in the context of the representations and petitions received and to ensure the majority of the SPD is progressed in a timely manner, it is proposed to remove the proposal for all-weather pitches and coach parking from the draft SPD.
High Street and Shared Surfacing Proposals	
Objection to shared surface concept as it would cause traffic congestion and could be dangerous	The draft SPD identifies a shared-surface arrangement as an option to improve pedestrian safety, visual amenity and traffic movements along the High Street, with further investigation and consultation required before any proposals are taken forward. Shared surfaces are a proven approach elsewhere that could potentially be implementable on the High Street and was therefore included as an option in the draft SPD. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. <b>Change – remove text relating to highways proposals throughout the document.</b>
Objection to the text at 6.8 which proposes amending the 258 bus route to be replaced with a single decker service as this service is at capacity at peak times and would negatively affect residents, businesses and other Schools in the area	The draft SPD identifies potential changes to the bus routes running over the Hill as means of address traffic and pedestrian safety issues, with further investigation and consultation required before any proposals are taken forward. In response to broader concerns regarding potential changes to the highway and public transport within the area, it is proposed to recommend that these are removed from the SPD. <b>Change – remove text relating to highways / public</b>

Respondents Comments by Issue	Council's Response / amendments to draft document
	transport proposals throughout the document.
Support expressed for the principle of shared surfaces which could improve the environment and increase pedestrian safety	As noted above, the option for a shared surface arrangement was suggested as a possible means to improve the environment and pedestrian safety. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.
Objection to the text at 6.8 which explores the option for closure of the road to cars in one direction, only allowing for buses and other authorised vehicles as this would cause congestion elsewhere, and would deprive residents and businesses access to their properties. It would also result in dangerous road conditions due to people having to perform uturns to get out of roads that would not have through access.	The draft SPD identifies partial closure of the High Street to cars in one direction as an option to improve pedestrian safety, visual amenity and traffic movements along the High Street, with further investigation and consultation required before any proposals were taken forward. Such an arrangement is a proven approach elsewhere that could potentially be implementable on the High Street and was therefore included as an option in the draft SPD. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.
Objection to the text at 6.8 which proposes the closure of the High St to traffic between West St and Grove Hill as this would cause congestion elsewhere, and would deprive residents and businesses access to their properties. It would also result in dangerous road conditions due to people having to perform u-turns to get out of roads that would not have through access	The draft SPD identifies closure of the High Street to traffic as one option to improve pedestrian safety, visual amenity and traffic movements along the High Street, with further investigation and consultation required before any proposals were taken forward. Such an arrangement is a proven approach elsewhere that could potentially be implementable on the High Street and was therefore included as an option in the draft SPD. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. <b>Change – remove text relating to highways proposals throughout the document.</b>
Shared surface concept could reduce parking in the area causing further traffic congestion issues	The draft SPD identifies a shared-surface arrangement as one option to improve pedestrian safety, visual amenity and traffic movements along the High Street, with further investigation and consultation required before any proposals were taken forward. Shared surfaces are a proven approach elsewhere that could potentially be implementable on the High Street and was therefore

Respondents Comments by Issue	Council's Response / amendments to draft document
	included as an option in the draft SPD. In response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. <b>Change – remove text relating to highways proposals throughout the document.</b>
Branding of street furniture could lead to perceptions that the High Street is private, and could detract from the character of the area	In response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.
Support expressed for the reduction of the dominance of the car on the Hill, and for restricting access to public transport	Support noted. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document, but retain general comments regarding the need to improve pedestrian safety.
Suggestion that a subway could replace the existing zebra crossing, alleviating safe crossing issues and improving traffic flow	It is difficult to envisage how a subway could be accommodated within the school grounds / highways land as significant excavation would be required to construct the accesses to the subway. Such a structure would potentially have an adverse impact upon the heritage assets within the area. The existing zebra crossing serves both the public and school, whereas the subway is likely to only be able to serve the school as there is limited scope to construct subway entrances within the public highway due to the constraints outlined above. It would also be a costly measure that would not fully solve the issue. <b>No change.</b>
Suggestions that more road bumps, more pedestrian crossings and additional railings could improve safety, rather than closing or restricting access to the road	The draft SPD proposed a number of potential changes to the highway arrangements; this list however was not intended to be exhaustive and other options such as that suggested in various representations could be considered. However, in response to broader concerns regarding potential changes to the highway within the area, it is proposed to recommend that these are removed from the SPD. Change – remove text relating to highways proposals throughout the document.

Respondents Comments by Issue

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# Sports Hall, Science Building and Music Auditorium - Metropolitan Open Land Swap - Zone A Proposal 1 and 4, Section 5.3

The principle of MOL swap should only be considered at a later date when a detailed design has been worked up, so as to assess the impacts – should be removed	The draft SPD identifies the principle of a MOL land-swap in the context of the overall master plan for the School Estate. This is in a general sense, having regard to the extent of proposed new buildings and those proposed to be removed. It does not formally agree any land swap. Detailed consideration as to whether a land swap is acceptable will occur when formal planning applications are made and would be subject to a s106 planning obligations agreement and subsequently included in any Local Plan review. Additional text could be included in the SPD to clarify the detailed considerations that will be taken into account for the principal of a land-swap to be taken forward into actual reality. It is relevant to note that the area of potential 'swap' represents only a small fraction of the overall Metropolitan Open Land that covers the majority of the School Estate.
	The Greater London Authority (GLA) has advised that 'on the basis that the SPD advocates an approach that would result in "no net loss in the amount or quality of MOL", and that the reconfiguration would deliver a coherent and contiguous expanse of MOL (and an anticipated net gain in MOL) GLA officers are satisfied that the SPG is in general conformity with the London Plan'. Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL 'land-swap' and factors that will be considered.
Objection to the reconfiguration of MOL as it would not be of equal value and openness	The proposed reconfiguration of MOL will create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the upper parts of Hill itself. It would be extensively landscaped and form part of the overall landscape structure of the site, thereby making a significant contribution to its openness. Additional text could be included in the SPD to clarify the detailed considerations that will be taken into account for the principal of a land-swap to be taken forward into actual reality. Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL 'land-swap' and factors that will be considered.

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Concern with regards to the loss of the Bowyer Webb Pavilion which adds to the unique character and history of the area	The Bowyer Webb Pavilion is not included within a Conservation Area, nor is it a statutory listed building, nor included on the Harrow Local List; it is therefore not a designated heritage asset. <b>No change.</b>
The configuration of the proposed replacement MOL land would not be open due to the modern languages block above it.	Viewed in its entirety, the proposed reconfiguration of MOL (including the removal of Peel House) will create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the upper parts of Hill itself. This will form part of the overall landscape structure of the site, thereby making a significant contribution to its openness. Additional text could be included in the SPD to clarify the detailed considerations that will be taken into account for the principal of a land-swap to be taken forward into actual reality. <b>Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL 'land-swap' and factors that will be considered.</b>
Land returned to MOL use from built use is unlikely to be of the same quality and even a greater area of such land would not compensate for this lack of quality and so this aspect of the SPD need revisiting.	The primary function of Metropolitan Open Land is its openness, rather than 'quality'. The proposed reconfiguration of MOL will create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the upper parts of Hill itself, thereby protecting the openness of that part of the site and its strong link with the top of the Hill. However, the 'quality' of the MOL will be enhanced, as it will be extensively landscape and form part of the overall landscape structure of the site. Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL 'land-swap' and factors that will be considered.
The sports centre should be rebuilt on the same site with proper foundations this time (not relying on the mass of water for stability) and extra storage space can be obtained by digging down into the hill. This brown field strategy will preserve Metropolitan Open Land (MOL).	Rebuilding the sports centre on the same site would be logistically difficult as it would leave the school and its external users without a sports centre during the construction period, which would be likely to be at least two years, significantly impacting upon both the School and external users. Relocation of the sports centre allows for the central landscape core to be established. Additional text could be included in the SPD to clarify the detailed considerations that will be taken into account for the principal of a land-swap to be taken forward into actual reality. Change – insert additional text in sections 5 and 6 clarifying the nature of the potential MOL 'land-swap' and factors that will be considered.

Respondents Comments by Issue	Council's Response / amendments to draft document	
Suggestions that new buildings should be built in the non MOL areas where there are already buildings, i.e. Peel House knocked down and rebuilt fit for a new purpose, such as the Music Auditorium. Its location is very close to other buildings with ready and efficient access to it	The removal of Peel House is part of the broader landscape proposal to create a core central landscape extending the MOL on the lower slopes of Harrow Hill up towards the Hill itself; retention of Peel House / construction of a new building in this area would impact upon that proposed core central landscape. <b>No change.</b>	
New Science building should be constructed on the site of Peel House, thus avoiding encroachment onto MOL, and would be closer to the existing classrooms	The New Science building is not located on MOL, so therefore its construction does not encroach on MOL. <b>No change.</b>	
Landscape Core Proposal		
The view that would be created by opening up this landscape core should be publicly accessible	There are already established rights of way through the School Estate and the Harrow Local Plan protects a number of publically accessible views across the school (from the public highway). <b>No change.</b>	
Objection to the loss of trees and landscaping in this area	Any detailed proposals will need to be accompanied by an arboricultural implications assessment. Existing trees and landscaping will be retained where possible and extensive new landscaping will be provided. Any potential loss of trees should be seen in the context of the significant tree coverage across the School estate. <b>No change.</b>	
New Entrance Building - Proposal 7 Zone A Se	ction 5.3	
Objection to locating a new reception area at the junction of West Street and the High Street. Suggest it is sited in Football Lane or Garlands Lane where the pedestrian and traffic movement is less intense.	The proposed location of the new entrance building is intended to assist in way- finding by creating a more obvious 'arrival point' for people visiting the school for the first time. The locations suggested in the responses are not visible from the main thoroughfares and are remote from the main school areas. Issues relating to the impact of the new building on pedestrian and traffic movements would be addressed when any detailed planning application is made. The new building is intended to provide better facilities than those existing, rather than representing an additional facility (i.e. it does not create additional trip generation). <b>No change.</b>	

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The new building's location could adversely impact on the character of the area and views on the hill	The design considerations identified in the SPD include the need for this proposed building to respond to the character of the area views on the hill; these guidelines could be further expanded-upon / strengthened to re-enforce this point. These issues would be addressed in detail when any planning application is made. <b>No change.</b>
Any new building on this site should be of traditional design	The SPD does not seek to be prescriptive with respect to the design style of any proposed buildings. Rather, it seeks to provide clear guidelines to what the design of any buildings should achieve. In the case of the proposed new entrance building, this includes responding to the unique site conditions and surrounding character and setting (context). Further text could be added to emphasis design / materials need to respond to context. <b>Change – insert</b> <b>additional text in relation to design in context.</b>
Suggestions that the new Entrance Building should be on land just off Watford Road, this would give an impressive entrance looking onto the Estate and would reduce congestion on the hill.	Previous discussions regarding access off Watford Road have indicated that Transport for London would be reluctant to agree to such an access, particularly when there are other alternative access routes. A location off Watford Road would also be remote from the historic heart of the School, namely along the High Street (the Speech Room, School Chapel, Vaughan Library). <b>No change.</b>
Concern that the parking proposed to accommodate visitors (Proposal 9) is not timed to coincide with this development (phasing on page 44), and so would lead to parking problems and congestion on the High St.	The proposed new entrance building is intended to replace existing buildings and the draft SPD does not envisage the overall number of students at the school will increase. Consequently, the proposed new building itself should not generate a significant number of new vehicular movements. The car parking outlined in proposal 9 is intended to improve the existing car parking arrangements on site for visitors and does not necessarily need to be delivered at the same time as the new entrance building. Car parking arrangements will be considered in detail when formal planning permission is sought for the new building. Section 6 could be strengthened to ensure that car parking / access arrangements to the new entrance building have regard to any implications on the High Street. Change – add additional text to section 6 regarding transport / access / car parking arrangements.

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## Staff Accommodation Zone C

The proposal for three new buildings for staff housing is far too vague and should not be allowed to stay in the document in such a format. Could just buy vacant properties on the hill. Building new accommodation conflicts with SPDs aim of minimising new buildings	The draft SPD seeks to identify the intention that additional staff accommodation is provided in this part of the site; the location already contains a large amount of staff accommodation. The draft SPD by its nature does not provide specific detail about the proposals; rather, it identifies the considerations that will need to be addressed when formal application is made for planning permission. This part of the site is relatively unconstrained with respect to new buildings, as whilst it is located within the Harrow Park Conservation Area, it is not located in Metropolitan Open Land, Site of Importance for Nature Conservation or the registered Harrow Park designation. References in the SPD to minimising the need for new buildings on the site, before contemplating new buildings. <b>No change.</b>	
General Comments Not Site Specific		
Concern over the loss of trees over the site, which would have negative impacts on biodiversity and the character of the Hill	The impact of any potential tree removal required to facilitate the development of the proposals contained within the draft SPD would be assessed when detailed application is made for planning permission. At an estate-wide level, proposals in the draft SPD have sought to minimise tree loss through the site- selection process and the future detailed, project-specific investigations will seek to minimise the loss of trees at an individual site level. Section 6 could be re-enforced to make reference to general requirements relating to trees under the Town and Country Planning (Tree Preservation) Regulation 2012. The School is already seeking to prepare a woodland management plan to cover vegetation across the Estate. <b>Change – insert additional text regarding trees and landscaping considerations.</b>	
Fencing should be in keeping with the character of the area, and consistent with the traditional fencing currently used	There are two proposal specific references to fencing within the draft document. A general comment regarding fencing needing to be appropriate to its purpose and context could be inserted in the general design guideline section (i.e. section 6). <b>Change – insert additional text regarding fencing in section 6.</b>	
SPD should mention public rights of way across	The draft SPD repeats the site allocation description in the Site Allocations	

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the estate and how they will be maintained, protected and enhanced by the proposals nor what impact there will be upon them during the necessary demolition, building and other works and how any impact will be minimised and mitigated	Development Plan Document (DPD), which makes reference to the rights of way that pass through the site and that 'proposals must have regard to the public rights of way, ensuring that these do not become obstructed and that the quality of the experience enjoyed by walkers is not diminished. Proposals requiring re-routing of public rights of way will not be permitted if this would lead to substantial diversions at odds with pedestrian desire lines through the land'. These requirements could be re-iterated in the general design guideline section (i.e. section 6) and the rights-of-way shown on Figure 2 (Designations). There are processes available under legislation to enable amendments to rights-of-way arrangements i.e. they are not necessarily fixed in-perpetuity and can be amended following due process. However, none of the proposals block rights-of-way. <b>Change – additional text to be inserted in the document clarifying that the proposals do not block any rights-of-way and including these on Figure 2.</b>
The SPD does not consider the needs of members of the public navigating public rights of way across the school estate and how to address the issue of assisting them to easily follow any chosen route by signposting, waymarking and eradicating physical barriers that have been erected over the years that impede their progress.	As noted above, the SPD repeats the site allocation description regarding rights of way. <b>No change.</b>
The proposed perimeter service road is unacceptable. This area is utilised by several public rights of way and such a road would be seriously detrimental to pedestrian use and amenity value of the route and of the MOL.	The proposals relating to the perimeter service road are limited to a realignment of the service road in the vicinity of the dining hall / kitchen service yard. This new section of road is intended to create a more direct route and remove the need for vehicles to pass through the proposed landscape core, thereby improving visual amenity and pedestrian safety, This section of new perimeter road will not adversely affect the rights-of-way. <b>No change.</b>
Given that much of the school grounds are covered by an Archaeological Priority Area additional references to archaeology should be included in paragraphs 2.10 and 6.1.	Noted. Paragraph 2.10 already makes reference to historic context, which includes archaeology. <b>No change</b> .

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Paragraph 2.18, - it may be preferable to commission an over-arching desk based assessment for the masterplan to identify archaeological significance and potential, key issues, archaeological character areas and approaches for each specific proposal, instead of seeking individual archaeological assessments for each application site.	Noted. This suggestion could be included in the draft SPD as an additional, alternative approach to undertaking assessments on a proposal-by-proposal basis. The School is already working with the Greater London Archaeology Advisory Service (GLAAS) on Estate-wide archaeological investigations. Change – additional text to reflect these points.
In the policy considerations paragraph on page 28, the reference to 'character' could be replaced by the term 'setting' In relation to listed buildings. When considering the impact on conservation areas refer to 'character and appearance'. This will ensure that the terminology is clear and in keeping with the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990.	Noted and agreed. Change – amend document as suggested.
The requirement for new buildings to have a contemporary design and 'fresh' materials is overly prescriptive. This approach is unlikely to be the most appropriate solution in all locations, particularly in the setting of heritage assets. Given the extensive heritage sensitivities around the school's buildings and landscape setting the references in paragraphs 6.1, 6.2, 6.5 and 6.7, should be modified to take greater note of the context when considering design solutions. This will allow flexibility for contemporary or traditional designs, depending on the circumstances of the site. In paragraph 6.1 for example you could say:	It is not intended that the design elements of the SPD are prescriptive; it is accepted that some of the working in section 6 could be interpreted to be prescriptive, particularly when read in isolation to the rest of the section. Some minor amendments could be made to ensure the document does not read as being prescriptive. Section 6 already includes reference to 'contextually appropriate design', but further references could be added where appropriate. <b>Change – amend document as suggested.</b>

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"Make a positive contribution to the setting of the School through excellent contextual design."	
In paragraph 8.2 which refers to the implementation of the SPD, we would encourage you to include Historic England and GLAAS as pre-planning consultees for works affecting the significance of Grade I or II* listed buildings, significant demolition to any listed building, or which may affect archaeology on the site.	Noted and agreed. A general comment on other consultees (as appropriate to the specific proposal and location within the School) would be included. Change – amend paragraph to include reference to relevant statutory consultees.
In relation to the historic landscape, the term 'landscape setting' (1.11) is better than 'landscapes' (1.6). Similarly in paragraph 5.3 the term 'axial core' is unclear, and could be better described as 'a strong axis within a central core' in our view.	Noted and agreed with respect to landscape / landscape setting. 'Landscaped axial core' considered to be sufficiently clear in the context of accompanying maps and text. <b>No change.</b>
In order to optimise the works to the landscape, notably in paragraphs 6.1 and 6.2, the history of the formal garden merits research to understand if it is significant. Likewise, the school should monitor and record changes in the soft landscape estate such as plant diseases, as part of the works in bullet point 6, paragraph 7.2, to ensure the long term success of the landscaping works.	Noted and agreed; however no change to SPD necessary. No change.
Documents time frame is too long – establishing principles for development that may happen 15 years time is too short-sighted, these principles should be revisited every 5 years, and a review mechanism incorporated into the SPD	The SPD principles and design guidelines are not intended to be prescriptive; rather, they seek to elaborate on how the policies contained in the Harrow Local Plan will be applied to this specific site in the context of the school's proposals over the next 15 years. The SPD itself is a material consideration in determining planning applications, rather than prescribing the outcomes of any planning applications. Any 'changed circumstances' that warrant an alternative

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	approach than that outlined in the SPD would be given appropriate weight in determining the planning application. The SPD already makes reference to a review-mechanism. The Harrow Local Plan itself is likely to be reviewed at least once, during the 15 year period and any changes to policies would supersede the SPD to the extent that there is conflict between the two. <b>No change.</b>
SPD should clarify exactly who will benefit from community access – will members of the public be able to use the new sports facilities	The extent of public access to facilities will differ for individual proposals, depending on their nature, location and the school's operational needs. The extent will therefore be considered when planning applications are made and in accordance with Policies DM17 (Beneficial Use of the Green Belt and Metropolitan Open Land) and DM48 (Enhancing Outdoor Sport Facilities). <b>No change.</b>
The following text should be added - It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development	This is a standard response / request from Thames Water. Rather than being specific about one particular type of infrastructure (water and sewerage), it is proposed that the SPD be amended to make reference to ensuring appropriate infrastructure is provided to support the proposals contained in the document, as required by Core Strategy Overarching Policy Z (Required Infrastructure). Change – additional bullet point in paragraph 6.1 regarding adequate physical and social infrastructure.
The following text should be added - It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not	This is a standard response / request from Thames Water. Given that parts of the site are subject to surface water drainage issues, a general comment regarding surface water drainage / sustainable drainage systems could be included in the SPD. <b>Change – insert additional text regarding surface</b>

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be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."	water drainage in section 6.
<ul> <li>the major contributor to sewer flooding."</li> <li>General comments regarding the legibility of the document, including: <ul> <li>Some of the maps not being particularly clear.</li> <li>References to buildings / locations within the school may not be clear to those not familiar with the school.</li> <li>Conservation areas not shown on Figure 2.</li> <li>Area of Special Character not defined.</li> <li>Appendix A considered superfluous</li> <li>Site of Nature Conservation Importance for Area B (Pitch-and-Putt Golf Course) not sufficiently addressed in sections 5 and 6</li> <li>References to Harrow Park being 'listed' when it should be referred to as 'registered'.</li> <li>References to 'Harrow Park' unclear – does it refer to the open space / park, or the road called 'Harrow Park'.</li> </ul> </li> </ul>	Additional effort will be made to improve the clarity of mapping in the final document, including inserting an additional map of the school buildings. Conservation Areas are shown in Figure 3, along with statutory listed and locally listed buildings. Area of Special Character could be defined where it is first referred to in the document, with reference to Development Management Policies Local Plan. Appendix A is considered to provide historical context to the proposals and the School's management of its built and environmental assets for over 400 years. The status of Area B as Site of Nature Conservation Importance is referred to in section 5; reference to biodiversity could be included in section 6. Registered Parks and Gardens are added to the National Heritage List for England (NHLE), which contains the full range of nationally designated heritage assets such as listed buildings, scheduled monuments etc. Consequently, it is correct to refer to them as either listed (i.e. on the List), or registered.
<ul> <li>Harrow Park</li> <li>Location of new entrance building not clear</li> </ul>	References to Harrow Park are generally clear when read in context, but could be further clarified. The locations of the relocated 5-a-side pitch and the new entrance building are
	shown on Figure 6 (Indicative Proposal Areas). Partial change: insert additional text as outlined above.
Principle and function of a Supplementary Plan	ning Document
Queries as to why an SPD had been prepared and concerns regarding the implications of the	Annex 2 of the National Planning Policy Framework (NPPF) defines SPDs as 'documents which add further detail to the policies in the Local Plan. They can

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document being adopted with respect to future planning applications.	be used to provide further guidance for development <i>on specific sites</i> , or on particular issues, such as design' (emphasis added). The NPPF therefore clearly indicates that it is appropriate for SPDs to be prepared for specific sites. The draft Harrow School SPD supplements Harrow's Local Plan site allocation Site G01, which is one of the largest allocated sites in the Harrow Local Plan, and one with many multi-layered planning considerations (including, for example, heritage, biodiversity, Metropolitan Open Land, operational needs of an educational facility etc) and therefore additional guidance provided by the SPD is considered beneficial.
	The NPPF indicates that SPDs are capable of being a material consideration in planning decisions but are not part of the development plan. The National Planning Practice Guidance (NPPG) indicates that a material planning consideration is one which is relevant to making the planning decision in question (e.g. whether to grant or refuse an application for planning permission). There is however a distinction between the question of whether something is a material consideration and the weight which it is to be given. Provided it has regard to all material considerations, it is for the Council (as Local Planning Authority) to decide what weight is to be given to the material considerations (such as the proposed SPD) in each case. Concern that adopting the SPD implies 'automatic approval' of subsequent planning applications is unfounded.
	It should be noted that the SPD does not preclude the school coming forward with applications for proposals that are either not included in the SPD, or differ from the SPD (i.e. in a different location, for example). Such applications would be assessed against the policies contained in the Council's development plan, which includes the London Plan and the Harrow Local Plan. The SPD would be a material consideration to the extent that it is relevant to the proposal. Similarly, works currently occurring on the site should not be seen as pre-empting the outcomes of the SPD, as provided these have the appropriate planning permissions, can occur notwithstanding the SPD process (a number of representations expressed concern in this regard). <b>Change – insert additional text in section 1 under 'Status of the Document'.</b>

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Many responses also queried the role of the Council in the process given that the SPD is essentially as masterplan for the School's estate.	The supporting text to the Harrow School site allocation clearly indicates that an agreed masterplan will be prepared; the draft SPD forms that masterplan. The Council (as Local Planning Authority) lead on the preparation of the SPD, but the Harrow School was heavily involved as the SPD relates the School's estate. <b>No change.</b>	
Some comments suggested that the SPD should have covered the entire Hill area	The majority of the Hill and surrounding area is already covered by SPDs in the form of Conservation Area Character Appraisals and Management Strategies. Additionally, the Core Strategy Local Plan already provides area specific guidance for all of Harrow on the Hill & Sudbury Hill. The scope of the Harrow School SPD is to provide a masterplan for the School Estate (i.e. a specific-site, as envisaged in the NPPF), not the entire Hill. <b>No change.</b>	
Consultation Arrangements		
Notification letters should have been sent to individual properties on the Hill.	The Council does not normally write to individual adjoining / nearby properties on strategic documents such as SPDs - this happens when a Planning Application for a development is submitted to the Council. This is because the contents of an SPD or Local Plan document can cover or affect a very large proportion of the Borough, making identifying and writing to every property that could be considered as being affected disproportionately resource intensive. The Council initially sent letters to contacts on its Local Plan database, which includes a number of residents' associations on the Hill (although this list is not exhaustive). <b>No change.</b>	
There was insufficient publicity undertaken at the start of the consultation period to ensure that all relevant people were aware of the consultation.	The consultation arrangements put in place at the beginning of the process met and exceeded statutory requirements. Additional measures were put in place, including the period being extended to 31 May 2015 (a further four week), an additional drop-in-session was organised, public notices were placed on lampposts on roads surrounding the School's estate, and notifications were delivered to properties on Harrow Hill within the vicinity of the proposed development locations outlined within the SPD. <b>No change.</b>	
A second round of consultation should be held on	A second round of consultation on the amendments is not required by the	

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the proposed amendments to the document in response to the representations.	Regulations, but respondents are advised of the outcomes of the consultation and the Council's response. <b>No change.</b>

List of Respondents		
A & J Vickers		
A CARTER		
A fazakerley		
A Hodsdon		
Adam Howard		
Alexia Alexandrou		
Alison Deeth		
Amanda Shaw		
Amy Capper		
Andrew Reed Architects		
Angela Inglese		
Angie Chiswell		
Anthony Wood Harrow Public Transport Users Asc		
Avtar Birdi		
B Jasani		
B Tyers		
Bernadettle O Connell		
Bijal Shah		
Bill Dalton		
Bob Griffing		
Byron Hill Residents Association		
Campaign for a Better Harrow Environment		
Caroline Ellis		
Caroline Jackson		
Carolyn Quillfeldt		
Catherine Jaquest		
Catherine Leedham		
Celia Baker		

Chelsie Bowden Chris Robinson Christine Andrews Christine Harvey **Christine Heels** Christopher Lambert Ciaran Hanway Cllr J Anderson Conservation Area Advisory Committee Damian nevins Danielle Mercey Danielle Mercey Dave Payette David Artus David Callaghan David Elliott David Griffiths David Hume David Mercier David Rice Davina Fennemore Dawn Woodley Debbi Herga Decima Nichols Denis WA Bower Denise Robertson Diane Davidson Dolls House on the Hill Café Douglas Benham Douglas Dodd Dr Frances Clegg

E & J Edwards
eileen kinnear
Eitan Carmona
Elizabeth Booth
Ellyn Smith
Environment Agency
Emma Linley
Emma Wallace Green Party
Ershe & Rishabh
ES Correia
G Callaghan
G Pritchard
G Sharland
Gareth Thomas MP
Gaynor Lloyd
Geoffrey Sweet
Georgie Housley
Gillian Anderson
Gleyns Evans
Graham Wright
Hannah Krol
Harrow Environmental Forum
Harrow Golf - Sarah's Café
Harrow Hill Trust
Harrow on the Hill Forum
Heathrow Airport Ltd
Highways Agency
Historic England
Hugh and Ann Allen
Ian and Ann Whybrow
Irene Lawrence

J & A Chandhock J & J Fowler J & P Confavreaux J & V Thomson J & V Wollaston J Golz J Hindley & M Springal J Lawrence J Quillfeldt Jack Gorman Jake Thomson James Cann Jamie Smith Jane Galbraith Jane Yardley Jannice Ferrai Jeremy Mark Jill Berry Joanna Heneker Joanne Nixon Joanne Russell John McDonald John Rowe JR Sinfield Judith Mills Julie Harrison K A Mehte K and C Smith K Singh Rai K Tweedie Ken Smith

Kieran Breen	Mr & Mrs Payne
L & G Isaacs	Mr & Mrs White
L Beraha	Mrs J Williae
L Clark	Mrs S Hassett
LB Brent Council	Mukundrai Jasani
Linda Johnson	N Henderson
Louise Kelly	Naomi Artus
Louise Sweeney	Natural England
Lucy Baxter	Neil Davidson
Lucy Morris	Neil De Mello
M & J Radford	Neil Gudka
M & P Freely	Nicholas Athinodorou
M Savill	Nick Simpson
Margaret Conroy	Nicola Devane
Margaret Spafford	Nora Dean
Marion Bloom	Norris Bosworth
Marion Garner Patel	Owen Peachy
Martin Oakley	P &D Gudka
Mary Brennan	P KOZLOWSKI
Mary Dobson	Pam Neville
Mary Finnegan	Pamela Woodley
Mary Heal	Paul Catherall
Maxine Oneill	Paul Joffery
Metropolitan Police	Pauline Chandler - St Mary's Church
Michael Chalk	Pauline Kay
Michael Herbert	Peter Luck
Michelle Sonna	Peter Tomsett
Mike O Brien	Peter Townsend
Mike Sullivan	Philip Cramer
Monika Clifford-Varley	Philip Frame
Monique Burnell	Philip Freeman

Philip Sykes
PR Edwards
Q and F Williams
R & H Pringle
R Clark
R Gallagher
R Jeeves
R Kershaw
R Medcalf
Raymond McGonigle
Rebecca Hanway
Richard Goldberg
Roxborough Residents Association
S Vashi
Saints Inline LDC
Sandra Levy
Sarah Elmey
Sean Lavelle
Shaileen Shah
Simon Bishop – Sarah's Cafe
Siobahn Rensen
Smith, Ken
Stephanie Da Silva Jardim
Sue Lloyd
Suneet R Kapur
Sunil Mistry
Tenterden Parks and Neighbourhood Group
Teresa Halpin-Antunes
Thames Water
Thomas Maguire
Tony Hall Williams

Transport for London
Una Tiernan
Wendy Raeburn
Wulff Cochrane
Zahra Sheriteh

In addition to the above, two petitions were received objecting to the proposals set out in the SPD for Zone B (Harrow Golf site). These petitions totalled over 2,000 signatures.

#### Appendix 2 – List of Consultees on the Local Plans Database

Moderation Home Office Fields in Trust (FIT) Nursing Services Metropolitan Public Gardens Association

Office of Government Commerce Police Architectural Liaison Officers/Crime Prevention Design Advisors London Borough of Brent Department for Culture Media & Sport Department for Education and Skills Harrow Health Authority Elstree and Borehamwood Town Council Elstree District Green Belt Society Department for Environment, Food and Rural Affairs Department of Constitutional Affairs

Department of Works and Pensions (DWP) Department for Business, Enterprise & Regulatory Reform London Borough of Camden

Council for the Protection of Rural England(Harrow) Council for British Archaeology Mark Dowse (Crime Prevention) Vodafone LTD Transport for London Dron & Wright Property Consultants London Fire & Emergency Planning Authority London Green Belt Council London Middx Archaeological Society London Natural History Society C/o British Museum (Natural History) Edgware & Burnt Oak Chamber of Commerce Farmers Union

Forestry Commission East England Conservancy London Tourist Board Hertfordshire County Council Hertsmere Borough Council Westminster City Council Royal Mail Letters Planning & Legislation Unit The Society for the Protection of Ancient Buildings Department for Business, Enterprise and Regulatory Reform (BERR) The House Builders Federation Sport England

Sport England (Greater London Region)

Watford Borough Council

Watford Rural Parish Council Health & Safety Executive Health Services Board Nature Conservancy Council London Waste Regulatory Authority A2 Dominion London Wildlife Trust Age Concern Harrow Planning Advisory Service

Martineau UK Commission for Architecture and the Build Environment(CABE) National Federation, Gypsy Liaison Group Acton Housing Association Home Group Catalyst Communities Housing Group West London YMCA Metropolitan Police

**Ealing Council** 

Barnet Council Three Rivers District Council

Harrow East Constituency Conservative Party Assembly Member for Brent & Harrow & LDF Panel Member

Gareth Thomas MP for West Harrow Bob Blackman MP for East Harrow Harrow Churches Housing Association Circle Anglia Family Mosaic Housing Transport for London Strategy Group

London Borough of Haringey London Borough of Hillingdon Brent & Harrow Chamber of Commerce BAA Aerodrome Safeguarding The Civic Trust Civil Aviation Authority Safety Regulation Group London Borough of Hounslow London Councils London Development Agency Harrow and Hillingdon Geological Society

Shepherds Bush Housing Association Limited Paddington Churches Housing Association Ltd Paradigm Housing Association

Housing Corporation Chiltern Hundreds Housing Association (Paradigm Housing Group) Shepherds Bush Housing Association Limited Stanmore Christian Housing Association Limited Peabody Trust The Abbeyfield Harrow Society Limited The Guinness Trust

Innisfree Housing Association Sutherland Housing Association Limited Inquilab Housing Association Limited

Haig Homes Anchor Trust Apna Ghar Housing Association Limited Network Rail

Great Minster House Group Property and Facilities Property Services Agency Rail Freight Group Road Haulage Association Iceni Projects GLA Biodiversity Group Strategy Directorate London Underground Harrow Hill Chamber of Commerce London Underground Limited Infrastructure Protection Drivers Jonas RPS Group Plc Pro Vision Plann & Design

DPDS Consulting Group Dalton Warner Davis

Oxalis Planning Andrew Martin Associates Barton Willmore WS Planning PB

Turley Associates GL Hearn Property Consultants The London Planning Practice

Halcrow Group Urban Initiatives Brown Associates Chiltern Hundreds Charitable Housing Association Ltd Dimensions (UK) Limited Jewish Community Housing Association John Grooms Housing Association Home Group Limited Genesis Housing Group (PCHA Maintenance) Pathmeads Housing Association Ltd Genesis Housing Group Home Group (Regional Development Director) Dimensions (UK) Limited Housing 21

Warren House Estate Residents Association Worple Residents Association Augustine Area Residents and Tenants Association Roxbourne Action Group (RAG)

Aylwards Estate Residents' Association

Canning Road Residents Association Cannons Community Association Canons Park Estate Association Canons Park Residents Association Alexandra Avenue(Newton Farm) Tenant's Association Barrowdene Residents Association Belmont Community Association Arrowhead Parade Tenants & Residents Association Bentley Priory Residents Association Bentley Way Association Blenheim Road Action Group Network Housing Group Origin Group Home Builders Federation CB Richard Ellis Nathaniel Lichfield and Partners

URS Corporation Ltd WYG Planning & Design Tribal Tym & Partners

CGMS Consulting DP9 Town Planning Consultants MEPK Architects Metropolis PD Octavia Housing

Metropolitan Housing Trust Limited Notting Hill Housing Trust Housing 21 Stadium Housing Association Limited Servite Houses LHA-ASRA Group Veldene Way Residents Association Victoria Terrace Residents Association Elmwood Area Residents' Association Elstree Village Association Gayton Residents Association Harrow Weald North Residents Association Harrow Weald Tenants and Residents Association Thurlby Close Residents Association Strategic Leisure Capita Symonds Knight, Kavanagh & Page MWH Global Gregory Gray Associates

First Plan Daniel Rinsler & Co Yurky Cross Architects Jones Lang LaSalle UK Planning Manager Dandara Ltd Saunders Architects LLP Savills Alsop Verrill Colliers CRE

CB Richard Ellis Ltd Berkeley Homes Cluttons LLP DTZ Elm Park Residents' Association Wilton Place Residents Association Rayners Lane Tenants & Residents Association South Harrow & Roxeth Residents Association The Clonard Way Association The Cresent Residents Association South Hill Estates Residents Association South Hill Residents Association South Hill Residents Association South Stanmore Tenants & Residents Association Lodge Close Tenants Association

**Brookshill Residents Association** Afganstan Housing Association Cherry Croft Residents Association Chichester Court Association Claire Court, Elm Hatch, Cherry Croft Residents Association Claire Gardens Residents Association Colman Court Residents Association **Copley Residents Association** Waxwell Close Association Wealdstone Residents Action Group Wemborough Residents Association West Harrow Residents Association Corbins Lane Residents Assoc. Cottesmore Tenants & Residents Association Crown Sreet & West Sreet Area Residents Association **Cullington Close Tenants Association Dalkeith Grove Residents Association Daneglen Court Residents Assoc** East End Way Residents Association Edgware Ratepayers Association Elizabeth Gardens Tenants Association Roxbourn Action Group (RAG) Kenton Forum Winton Gardens Residents Association Wolverton Road Tenants Association Cambridge Road Residents Association **Brockley Hill Residents Association** Aerodrome Householders Association

Woodcroft Residents Association

Tyrell Close Tenants Association Gleneagles Tenants Association Golf Course Estate Association

Atherton Place Tenants' Association South Hill Estates Harrow Ltd Herga Court Residents Association Gordon Avenue Residents Association Hobart Place Residents Association Grange Farm Residents Association Greenhill Manor Residents Association Greenhill Residents Association

**Greville Court Residents Association** 

Grove Tenants & Residents Association Hardwick Court Maisonettes Association Jubilee Close & James Bedford Close Residents Association Kenmore Park Tenants and Residents Association Kenton Area Residents Association Honeybun Tenants Association

Sonia Court Residents Association

Rowlands Avenue Residents Association Roxborough Park Residents Association Roxborough Residents Assoc. Roxborough Road Residents Association Rusper Close Residents Association Queensbury Circle Tenants Association The Pinner Association The Pynnacles Close Residents Association Pinnerwood Park Estate Residents Association Merryfield Court Residents Association Pinner Road & The Gardens Residents Association Pinnerwood Park C.A. Residents Association Manor Park Residents Association Letchford Terrace Residents Association Laburnum Court Residents Association Laing Estates Residents Association Hardwick Close Flats Association Harrow Civic Residents Association Oak Lodge Close Residents Association

Harrow Federation of Tenants & Residents Associations

Pinner Green Council Tenants Association Pinner Hill Residents Association Pinner Hill Tenants & Residents Association

Nicola Close Residents Association

Orchard Court Residents Association South West Stanmore Community Association Princes Drive Resident Association

Priory Drive Residents Association Sheridan Place Residents Association Northwick Manor Residents' Association Nugents Park Res Association Mount Park Residents Association Harrow Hill Residents Association Hatch End Association The Waxwell Close Association Woodlands Community Association Woodlands Owner Occupiers Roxeth First & Middle School

Pinner & District Community Association Raghuvanshi Chartiable Trust Eastcote Conservation Panel Post Office Property Holdings Stanmore Golf Club Stanmore Society St Anselm's RC Primary School Sheepcote Road Harrow Management Company Ltd Iraqi Community Association

Jehovah's Witnesses John Lyon School Roxeth Mead School

#### Royal Association in Aid of Deaf People

Royal National Institute For The Deaf Kenton Lane Action Group Kerry Court Residents Greensward Properties Ltd Grimsdyke Golf Club Stanmore Chamber of Trade Herts & Middx Wildlife Trust Tempsford Court Management Company Ltd Wembley Rugby Club English Golf Union Harrow Heritage Trust St Mary's Church Sudbury Court Residents Association Eastcote Village Residents Association Rama Court Residents Association

Harrow Heritage Trust, Harrow Museum & Heritage Centre The London Playing Fields Society The National Trust West Middlesex Centre The Ramblers Association - North West London Group Harrow Natural History Society Harrow Nature Conservation Forum Harrow Partnership for Older People (P.O.P) Friends of the Earth - Harrow & Brent Group Hatch End Cricket Club Estates Bursar Harrow School Bursar, Harrow School **Orley Farm School** The Twentieth Century Society The Victorian Society Harrow Association for Disability Harrow Association of Voluntary Service Harrow Athletics Club Dove Park Management Co West Harrow Action Committee Wealdstone Active Community **Clementine Churchill Hospital** Harrow Healthy Living Centre Hatch End Swimming Pool Whitmore Sports Centre Christ Church **Cygnet Hospital Clinic** 

Hathaway Close Residents Association Abchurch Residents Association Hazeldene Drive Tenants & Residents Association Harrow Dental Centre

Abbey Dental Practice B Cohen Dental Practice Bridge Dental Practice

**Bright Dental Practice** DentiCare Dr K A Nathan Dental Practice Dr Tikam Dental Surgery Family Dental Care G Bhuva & J Bhuva Dental Practice Harrow View Dental Surgery Harrow Weald Dental Practice M Ali Dental Practice N Bahra Dental Practice S Aurora Dental Practice Village Surgery Preston Medical Centre Streatfield Surgery **GP** Direct Medical Centre Pinn Medical Centre Simpson House Medical Centre **Enderley Road Medical Centre** Elliot Hall Medical Centre Aspri Medical Centre Bacon Lane Surgery Blackwell House Surgery

Harrow High Street Association Friends of Bentley Priory National Reserve Harrow in Leaf

Kenton Bridge Medical Centre

Kenton Clinic Mollison Way Medical Centre Pinner View Medical Centre

Preston Road Surgery **Primary Care Medical Centre Roxbourne Medical Centre** Savita Medical Centre (1) Savita Medical Centre (2) Shaftesbury Medical Centre St. Peter's Medical Centre Stanmore Medical Centre The Circle Practice The Elmcroft Surgery The Enterprise Practice The Harrow Access Unit The Medical Centre The Northwick Surgery The Pinner Road Surgery Uxendon Crescent Surgery Wasu Medical Centre Harrow Public Transport Users Association Harrow Weald Common Conservators Zain Medical Centre Alexandra Avenue Health & Social Care Centre Belmont Health Centre

Flash Musicals Pinner Wood Children's Centre Gange Children's Centre The Garden History Society The Georgian Group Harrow College (Harrow Weald Campus) Stanmore Park Children's Centre Whitefriars Children's Centre Chando's Children's Centre Grange Children's Centre Kenmore Park Children's Centre **D** Barnett Dental Practice Greater London Action on Disability Regard Age Concern London Centre for Accessible Environments **Royal Institute of British Architects** Commission for Architecture and the Built Environment Harrow Association of Disabled People JMU Access Partnerships JRF London Office United Kingdom Institute for Inclusive Design HoDiS Litchurch Plaza Shopmobility **Disabled Foundation** Harrow Crossroads Harrow Mencap Mind in Harrow Community Link Up Inclusion Project **Royal National Institute for Blind People** 

**Chandos Surgery** Charlton Medical Centre **Civic Medical Centre** Dr. Eddington & Partners (1) Dr. Gould & Partners Dr. Merali & Partners (1) **Dukes Medical Centre** Fryent Way Surgery Hatch End Medical Centre Headstone Lane Medical Centre Headstone Road Surgery Honeypot Medical Centre Stimpsons Mr David Cobb Pegley D'Arcy Architecture John Phillips NVSM Ltd

Roger Hammond Preston Bennett Holdings Ltd Studio V Architects Stephen Wax Associates Ltd W J McLeod Architect J G Prideaux Steene Associates (Architects) Ltd Stanmore Colllege Racal Acoustics Ltd Lloyds TSB The White Horse PH Curry Popeck Solicitors Allan Howard & Co Estate Agent Miss K Mehta

**Brent & Harrow Consultation Centre** Honeypot Lane Centre Kenmore Clinic North Harrow Community Centre Pinner West End Lawn Tennis Club Pinner Youth & Community Centre Brady-Maccabi Youth & Community Centre Grant Road Youth & Community Centre Henry Jackson Centre Lawn Tennis Association Irish Traveller Movement in Britain Habinteg Housing Association Sean Simara Mike Root Mr Julian Maw Harrow Agenda 21 Waste & Recycling Group Harrow and Hillingdon Geological Society

Eileen Kinnear A J Ferryman & Associates Anthony J Blyth ADA Architecture C & S Associates C H Mckenzie PSD Architects David R Yeaman & Associates Donald Shearer Architects D S Worthington Eley & Associates G E Pottle & Co Geoffrey T Dunnell Jackson Arch & Surveying Royal National Institute for the Deaf People First **Disability Awareness in Action** National Centre for Independent Living Headmaster, Harrow School Our Lady & St Thomas of Canterbury Pinner Hill Golf Club **Pinner Historical Society** Northwood & Pinner Chamber of Trade G Lines Peterborough and St Margarets High School for Girls Pinner Local History Society Pinner Local History Society David Kann Associates Aubrey Technical Services Mr M Solanki Mr A Modhwadia Mr S Freeman **RKA** Architecture Madhu Chippa Associates Mr J Benaim **Orchard Associates KDB** Building Designs Jeremy Peter Associates JC Decaux UK Ltd **Dennis Granston** K Handa Gillett Macleod Partnership D Joyner S Mistrv Saloria Architects Simpson McHugh

Mrs Dedhar Mr Jay Lukha Mr Patel Mr Lodhi Mr James Palmer Mr Harshan Mr Sam Fongho Mr A Ahiya Ms Pauline Barr Apollonia Restaurant Mr Harsham Mr Mark Roche Ms Cacey Abaraonye Mr R Shah Mr Terry Glynn Nugents Park Residents Association Linda Robinson Roxborough Road Residents Association Bryan Cozens Merryfield Gardens Residents John Richards & Co Mr Cunliffe LRHEquipment Hire Mr H Patel Le Petit Pain Mrs Jacqueline Farmer Mr Rashmin Sheth R Raichura Pharaoh Associates Ltd Mr Paul Bawden Mr Kumar

H Patel J Driver Associates John Hazell James Rush Associates Kenneth W Reed & Associates Naren Hathi Lawrence-Vacher Partnership Robin Bretherick Associates Patel Architects Ltd

PCKO Architects Pearson Associates Pindoria Associates **Richard Sneesby Architects** Mr P Varsani Satish Vekaria SS& Partners Survey Design (Harrow) Ltd V J McAndrew Nafis Architecture N M Architects Mr Ian Murphy Gibbs Gillespie Estate Agent Mr AbdulNoor Mr B Nieto Ms Jean Altman Mr Murray Mrs Tsang Paige & Petrook Estate Agent Mr G Trow Mr Parekh Mrs Walker

Jeffrey Carr **KDA** Designs Mr Gow Home Plans **KCP** Designs John Evans Sureplan J Loftus V Sisodia Anthony Byrne Associates **Top Flight Loft Conversions** S Vekaria A Frame David Barnard A Laight B Dyer Sheeley & Associates Michael Hardman **Canopy Planning Services** E Hannigan Plans 4 U P Wells Mr Sood Thomas O'Brien Wyndham & Clarke Bovis Lend Lease Fairview New Home Ltd Mr Suresh Varsani **Rouge Property Limited** Mr S Pervez C/O Mr T Mahmood The Castle PH Grimsdyke Hotel

Mr Deva Mrs Jill Milbourne Mr Yousif Ms Michelle Haeems Mrs Mandy Hoellersberger Mr George Apedakih Mr H Khan Mr John Fitzpatrick Mr and Mrs Siddigi Mr Shah Mr Goreeba Ms Anna Biszczanik Bhojani, Bhojani Properties Ltd Mr Damian Bucklev Mr Asury Mrs Trivedi Mr Mark Fernandes Mr M Selvaratnam Miss Da Cruz Mr Mohammed Hyder Mr P Allam Mr Kevin Conlon Mr Shah Mr Morshed Talukdar Ms Orci Mr Oliver Reeves Mr Michael Moran Mr SA Sved Mr Argarwal Mr R David Ms Lorraine Wyatt Mr Vishnukumar

Mr Abood Mr Sanders Mr Tom Johnstone Mr Daniel Petran Marchill Management Ltd Mr Milan Vithlani Miss Wozniak Ms Erika Swierczewski Mr Anat Mr Patel Mr T Karuna Hair 2 Order Mr John Imade I Muthucumarasamy Inthusekaran Ms Marli Suren Mr M Meke Team 2 Telecommunications Ltd Mr Sadiq Mr Gilani Mr D Burton Foxon Property Mr Reidman Mr Dillon Mr E Campbell Doctor A Savani Doctor Samantha Perera Ms Mc Gleen Mr Shemsi Maligi Mr Delroy Ettienne Mrs Gohil Ms Yvonne Afendakis Miss M Lean

Irene Wears V A Furby Kingsfield Arms PH Mr & Mrs Deller Raj Shah Stephen Hassler Mr Barry **Richard Maylan** Mr Bhupat Patel Mr Kirit Dholakia Mr Samit Vadgama Mr Rasite Mr Xioutas Mr B S Bhasin Mr W Ali MR Z Patel Mrs Shah Mr Kishore Tank Mr M Khan Mr Manesh Mrs Vad Ms Patricia Simpson Mr Liu Mr V Pansuria Mr A Patel Ms Rena Khan Dr A Savani Pk Properties Estate Agent Mr John Knight Miss Patricia Long Mr M Mccarrall Mr Oliver Abbey

P J Quilter Mrs M Moladina Mrs Gill Mr Pandya Lrh Equipment Hire MR Bharat Gorasia MR Imran Yousof Miss Wozniak Mr Gunasekera Mrs B Murray Mr R C Patel Mr Bernard Marimo Mrs Patel CCRE Touchstone Ltd Ms Rena Patel Mr M Patel Mr Amory & Glass Mr V Barot Mrs Patten Ms Samia Mr Anil Mavadia Mrs Winnie Potter Mrs P Naring University of Westminster Mr Peter Bennet Parkfield Estates Mr Dipack Patel Mr Jaymesh Patel Mrs Rabbie Mr Ahmed **Colin Dean Estate Agents** Mrs Changela

Mr Z Hansraj Mr Raja Ms Grace Ellis Doctor Amin Mr Noel Sheil Mr Shah Mr Singh Mrs Cirillo Mr Gary Marston Mrs Lilley Mr Michael Foti Helen Stokes Mrs S Narayan Mr Depaie Desai Mr D Morgan Mrs K V Hirani Mr Christopher Dixon Mr and Mrs Patel Mrs M Patel Mr P Mantle Mrs D Nagewadia Mrs R J Choudhry Mr David Michaelson Mr Yaqub Mr Wolf Mr Fabrizio Pisu Mrs Ram Mrs Patel Mr Dattani MRs Naring Mr R Harrison MRs Neetal Khakhria Mrs Lipton Mr Akhtar Mr Andrew Lemar Zoom the Loom Ltd Miss Mepani Mr Ali Mrs Shah Mr G Vitarana Mr Ashwan Shah Mr Simon Bull Ms Hema Ganesh Mr S Nathan Mrs Senanayake Ventra Management Ltd Mssr H Carolan Vantage Property Services Rawlinson Gold Estate Agent Mr R Shah Mr J Meegama Mr C Patel Mr N Shah Mr Alpesh Patel Mrs Derov Mrs H Pereira Ms Alison Wood David Conway & Co Estate Agent Mr Sandu & H Singh Mr R Jani Mr Dar Bathrooms/Kitchens/Conservatories Mr Black D Shemie

**Citywest Properties Ltd** In Residence Estates Mr K Patel Philip Shaw Estate Agent Mr A Patel Mr Hiren Hirani AKA Mrs Scantle Bury Ms Mitual Shah Mr Sideras Mr Wright Mrs Ahmed Mrs Anastasia Marshall Mr V Sorocovich Dr Vara Hinton & Bloxham Estate Agent Raka Properties & Lets Ltd Mrs Liza Mr Prajesh Soneji Mr Shah Mrs Amanda Fogarty The Rollands Phelps Cameron & Associates **PK Properties Estate Agent** Mrs Ved Mrs N Hindocha Mr Richards Mr Jeff Panesar Mr M Hag Mr Sidhu **Playfield Management SPLA** 

Mrs Bhudia Mr Hussain Mr Vivek Marwaha Mr Pedro Vas Hanover Shine Estate Agent Mrs Hirani Mr C Karaiskos **High Lawns Hostel** Mr Patel Ms Mullins Miss Innis Davis. Mr Sanjay Patel **Skippers Fish & Chips** MPS Architects Mr I avin Mr Stephenson Mallon Mr Pravin Bhudia Mrs Sandra Jenkins Mr P Nathan Cumberland Hotel MR Pulford **Tisser and Aromatherapist** Mr R Dutt Mr Lanagan Mrs Garner Ms J Sanagasegaran Mr Mohamed Ariff Mrs Elliot Mr N Radia Mrs S Akhtar MR Taylor Castle Estates

Mr A Kidwai MR Farhan Ebrahimjee **Camerons Jones** Mr D Saran Mr A Maragh Mr M Mockler Mr Bellank J B Webber Chemist Mr B Patel Panstar Group Ltd Stephen J Woodward Ltd Mr Hedvit Anderson Mrs Senanayake Mr Mitesh Vekaria Mr S Sharma Mr Jiten Soni Doctor A Savani Mrs Uzma Awam Mrs Nishma Palasuntheram Mr Mahmood Sheikh Mr Brian Watson Mr K Weerasinghe Ms Vanisha Patel Mr Vyas Mr A Clifford Mrs Shelagh Kempster Blue Ocean Property Consultant Mrs Roth Mr Kevin Conlon Mr Ramchurn Mr K Jabbari Mr McCormack

**Middlesex Properties** Mr M Fazio Quainton Hall School Mr Goodman Mr A Hanefey Mr Kahn Mr Jonjan Kamal Luigi Hairdresser Ms Lindsey Simpson, Mr David Benson Mr D'Souza Mr Arshad Minhas Dr P Sadrani Mr Eric Lipede Mrs McKenzie Mr C Mohotti Mr Dalius Miss M Patel Mr K Nava Mrs Trivedi Mr MH Asaria Mr N Johnstone Miss F Khan Mr A Balasusriya Mr John Campbell Mr P Lewis Miss Shah Mrs Regunathan Mr Dattani Mr Brian Lampard Mr Ralph Jean-Jacques Mr Rupesh Valji

Mr Sturrock Mr Mathew Hutchinson Mr Bhupinder Singh MRs J Ahilan Ms F Bajina Anscombe & Ringland Est Agent Mr NG Lakhani Mr Campbell Mrs R Draycott Stephen J Woodward Ltd Mr G Trow **Burgoyne Johnston Evans** Wilson Hawkins & Co Mr N Patel Mr Antonio Branca Mr Brijesh Mistry Mr Sanjay Naran Mr Mohamed Agwah Mr Ramzan Faroogi Mr A Jaroudi Mrs Jacqueline Pepper Mr Patrick Curran Mrs Jacqueline Pepper Mr Saleem Mr William Hunter Mrs Q Chow Mr Khan Mr Dene Burton Mr Deva Mr B Desai Miss J Parker Mr R Carnegie

Mrs Kettles Mr Rulamaalam Asokan Mr Alexis Mr Raymond Chase Macmillan Estate Agents Mrs O'Sullivan Mrs D Ahmed Mr Dene Burton Mr James Kearney Mr A Ahmed Mr G Puvanagopan Mr Patrick Curran