

Appendix 4 QPCC response to Regulation 14 comments from WCC (March 2017)

Policy/ Section	Officer Comments	QPCC response
<p style="text-align: center;">General Comments</p>	<p>The plan is well presented and there are many interesting and informative plans and photographs throughout the document. The plans are clear and relevant and the policies are distinguishable from the supporting text and include clear reference to strategic policies. It is worth bearing in mind that it is only things that are in the policies themselves that will have formal weight in taking planning decisions; the supporting text can justify or explain the policies but matters dealt with in it will not have the force of policy.</p> <p>It would be helpful if each paragraph is numbered throughout the document as this not only helps when providing and referencing comments but it will also be critical if the Plan becomes part of the development plan for the area. Officers considering and reporting on planning applications must be able to direct specific references to supporting text where relevant.</p> <p>Part 2 of the draft plan is well presented however, it means that the policies of the plan do not start until page 66. It would be helpful if this part of the plan could follow the policies themselves or be provided as an appendix.</p> <p>The plan makes reference to their being funding from the Jubilee Centre redevelopment from the Section 106 for the QPCC. We have checked the S106 linked to application 13/12250/COFUL but cannot find any reference to such a financial contribution – can you explain what this relates to?</p>	<p>Each paragraph has been numbered.</p> <p>Queen’s Park policies have been moved to the front of the document section 2 page 18.</p> <p>This reference has been removed from the plan.</p>
<p>Introduction</p>		
<p style="text-align: center;">Policy 1 Amenities</p>	<p>Whilst the aspirations of this policy are understood as currently drafted it raises general conformity issues with Westminster’s City Plan policy S34 ‘Social and Community Infrastructure’.</p>	

	<p>The policy as drafted actually weakens policy S34 as it limits the protection to the items listed in the table. We would suggest deleting this table as it will date very quickly and it would suggest any other or future social and community uses in the area would not be afforded the same level of protection. It may be more helpful to make reference to particularly valued uses in the supporting text but not include them as part of the policy.</p> <p>The draft policy also appears to mix up buildings and uses. Whilst policy S34 does provide some flexibility for public service providers to reorganise their provision it goes further than the current draft NP policy as the priority in any redevelopment of social and community floorspace is to ensure that it is retained or reprovided on site for another user. For example policy S34 requires social and community floorspace to be properly marketed for an alternative social and community use even if the existing provision (or occupied use) is being reprovided elsewhere. This is because the council recognises that once social and community floorspace is lost to another land use it is unlikely to ever be returned to social and community uses.</p> <p>The NP policy is more flexible than policy S34 in that it could allow a building to be redeveloped simply by the social and community use no longer occupying the building. The policy would be better focussed on considering the need and demand for social and community floorspace on the site rather than focusing on the specific occupier of the building and activities that are run from it. It is also difficult to protect the ‘amenities’ themselves through planning as it is possible to change to another occupier or Class D use through permitted development rights (and as is acknowledged, to Class A uses for a temporary period).</p> <p>The reference to the use no longer being financially viable is also different to the council’s policy which requires an applicant to demonstrate reasonable attempts to let the premises for social and community uses etc. Introducing financial viability provides developers with a route that the council’s policy currently does not. Financial viability is a difficult concept and as with policy S34 it has to be</p>	<p>The table has been deleted.</p> <p>The plan now says:</p> <p>POLICY 1 Amenities Development proposing the loss of community use will only be permitted where it can be demonstrated that the building no longer provides this use for the community. Where it is identified that there is a continuing need for a community use, applicants will need to demonstrate that there is adequate alternative provision within the Neighbourhood Plan area which has the capacity to meet the needs of the community that the lost use previously serve</p>
--	---	--

	<p>recognised that other factors have to be taken into account, like changes in patterns of need, different approaches to providing community facilities etc.</p> <p>Requiring any alternative provision to be located within the neighbourhood area is excessively onerous, using the phrase 'easily accessible from' would be better.</p> <p>The justification text seems to go further than the policy in that the policy talks about buildings providing services whereas the text considers the demand for the 'use' of a community facility. The sentence in the text about alternative venues being able to accommodate the community use to a level that is at least the equivalent of the current service in its existing location is different from the requirement in the policy, which deals solely with location. Planning policy requirements cannot be enforced through supporting text and it is therefore important that any 'requirements' of development are clearly set out in policy.</p> <p>Is this policy actually required? Does PolicyS34 already meet QPCC's objectives to protect social and community uses and floorspace?</p>	
<p>Policy 2 Queen's Park Hall</p>	<p>Neighbourhood plan policies can only legally deal with the use and development of land. This policy is not really a land use policy in this sense, as it mostly deals with management of the Queen's Park Hall rather than its use in planning terms. This may be something better dealt with in an annex.</p> <p>The majority of this policy refers to community uses of the building which are consistent with its existing lawful use, and as such are not problematic however the use of part of the building for retail may require planning permission depending on scale/nature etc. which could raise issues in conformity if this would result in the loss of social and community floorspace. Perhaps the supporting text can provide more detail on what type of retail uses would be acceptable and why this would support the sustainable use of the building.</p>	<p>The policy has been changed to say:</p> <p>POLICY 2 Queen's Park Hall QPCC will support the use of Queen's Park Hall as a community hall for the local community. Proposals for any development or change of use at Queen's Park Hall will need to demonstrate how they will assist in maintaining the building as a community asset.</p> <p>Reference to income has been deleted.</p>

	<p>Reference to the income should not be included in the policy as it is not a planning matter however it could be included in the supporting text. It would be helpful in this regard to be clear that the income referred to is income from rents, not income from retail businesses, and in what way would it be used for the benefit of the people of QP?</p> <p>There is perhaps a bit too much historical detail in the justification for Policy 2 – this detail would serve better as an introduction to the policy. It might also be worth considering merging policies 1 and 2 as both deal with social/community facilities.</p>	<p>Policy 1 and 2 have not been merged as Queen’s Park Hall is such an important amenity that is both listed and had a covenant on it to be used by the Queen’s Park Community.</p>
<p>Policy 3 Environment and Open Spaces</p>	<p>The introductory text on ‘Open Space’ should perhaps acknowledge the presence of the Royal Parks when referencing the fact that 22% of the rest of Westminster comprises green space.</p> <p>Whilst the aspirations of this policy are understood as currently drafted it raises general conformity issues with Westminster’s City Plan policy S35</p> <p>Open Space’.</p> <p>Policy S35 seeks to protect ‘...all open spaces....’ Whereas the NP policy is specific to the open spaces referenced in the plan. Whilst the supporting text may want to retain reference to the open spaces that are of particular value to QPCC the effect of the current draft is to limit the protection of other open</p>	<p>The introductory text on Open Space 2019 plan now states the following:</p> <p>There are few green spaces within the QPCC Neighbourhood Plan area. The evidence base (see Appendix A) notes that around 4.4% of the area is green space in contrast to a Westminster average of 22%. This 22% average reflects the fact that Westminster is responsible for the Royal Parks in the borough. These parks are not within easy access for residents of Queen’s Park. In contrast, and reflecting the residential nature of the area, Queen’s Park has about 26% of</p>

	<p>spaces. QPCC should also be mindful that the plan may have a lifetime of 20 years and that priorities as well as the landscape may change.</p> <p>The policy identifies specific open and green spaces within the neighbourhood area and sets out specific aspects that should not be harmed by development. Where there is harm, provision is made for this to be off-set by an equivalent community gain. The policy suggests that development which is adjacent to open spaces and thereby affecting its setting (which could be any type or scale of development) would need to be an ‘alternative facility’ which provides ‘significant social, environmental or economic benefits’ in order to be supported. It is not clear what this actually means and we are concerned that it provides an opening for different arguments to be made as to what constitutes such benefit in ways that compromise the protection given by City Plan policy S35. Saved UDP Policy DES12 deals with development adjacent to open space, does this already sufficiently cover QPCC’s objectives for this type of development? It is also unclear what “if the community would gain equivalent benefit from the provision of suitable replacement” space means, and this could be something developers would fasten onto, again potentially prejudicing the protection given by policy S35.</p>	<p>land area in use as domestic gardens (compared to Westminster’s average of 8%). It is important to protect the green spaces within the Neighbourhood Plan area, and to recognize the role of domestic gardens in contributing to overall green space and providing potential wider benefits with respect to climate change and biodiversity.</p> <p>Policy 3 has been deleted from The Neighbourhood Plan</p>
<p>Policy 4 Residential Gardens</p>	<p>The aim of this policy is noted however it may be difficult to achieve given the scope of the gardens in Queen’s Park and it could be difficult where existing areas are hard-surfaced. It would also be difficult in some circumstances to enforce as is it going as far as seeking to control the plants that residents can have removed from their gardens?</p> <p>A more positive approach would be to either state what forms of garden development would be acceptable or to simply have a presumption against development of gardens. As currently drafted the policy is full of very imprecise language (“significant harm”, “not normally be permitted”) which will make implementation difficult.</p>	<p>Residential Gardens is now Policy 3 and states:</p> <p>Development that results in the loss of private residential gardens will not be permitted.</p> <p>Justification 2.12 Gardens are an important characteristic in some parts of Queen’s Park and add to amenity value and biodiversity whilst also in the long term helping society adapt to the effects of climate change. They are therefore</p>

	<p>The balance of sustainable design solutions against the degree of harm to private residential gardens is not clear. Nor is the fact that the policy is aimed at the loss of garden 'space' as suggested in the supporting text. The policy references the '...loss of or significant harm to the ecological or landscape value...' and does not reference the amount of garden space. The policies intent in this respect should be made clear.</p> <p>Trading matters like energy efficiency against loss of garden space does not seem appropriate as it is not like for like for example, energy efficiency is not really a "solution" to the likely environmental impacts of loss of garden space. Would the addition of design solutions such as solar panels really mitigate the loss of garden space or harm to the ecological or landscape value – these seem to be two different policy aspirations and do not necessarily complement each other as suggested in the policy. If a reduction in garden space is permissible all efforts should be to enhance the value of the retained space and it is not clear that the addition of solar panels would achieve that aim.</p> <p>It would be helpful if the policy also referenced the fact that private gardens are part of the historic pattern of development that contributes to the character of the conservation area. This could be referenced in the supporting text in addition to the focus on ecological value. The policy could also reference the amenity value of the gardens.</p> <p>The second paragraph of the policy references sustainable design solutions in policy 7. Policy 7 deals with the QP Gardens Hut, and so should this be Policy 8. That said policy 8 does not really set out the kind of design solutions being referred to clearly. There is a list in the text supporting policy 4, - which does not, have the force of policy.</p>	<p>a resource to be protected for now and for the future. The Avenues area of Queen's Park Estate is known for its characteristic terraced housing where residents have access to both small front and back garden spaces. These are a resource to be protected for now and the future. The loss of garden spaces is therefore an issue of significant concern.</p>
--	---	---

<p>Policy 5 Recreation and Open Spaces</p>	<p>This policy seeks improvements to green and open spaces, and play space at specific locations. This is in keeping with the development plan for the area however it is not clear how this policy develops further on existing development plan policy.</p> <p>The same comments apply to this policy as those made on Policy 3 in that Policy S35 seeks to protect ‘...all open spaces...’ Whereas the NP policy is specific to requiring improvements to the spaces listed in Table 3.</p> <p>A map of the spaces in Table 3 would be helpful. Is the background evidence document referred to included in Part 2 of the plan? If not please can the evidence document be provided.</p>	<p>Policy 5 has been deleted</p>
<p>Policy 6 Allotments</p>	<p>This policy seeks new allotments and protects against harm or loss except where there is replacement and here there is benefit from the proposal. This is in keeping with the development plan.</p>	
<p>Policy 7 Queen’s Park Gardens hut</p>	<p>This policy seeks redevelopment of the storage building at the entrance to Queen’s Park Gardens to include a number of community facilities. The aim of this policy is recognised and noted however any proposal would need to be considered against the impact that it would have on the open space, amenity and character and appearance of the open space. How likely is it that any development would need to be larger than the existing hut? Could you consider wording that would allow this to be an exceptional case balanced only on the value that the development would bring to the community? Deliverability should be investigated by liaison with the council’s parks and leisure team and it the potential for impact on highways and amenity must be considered.</p>	<p>QPC has been working with Westminster City Council Parks and Leisure Department and there will be no loss of Open Space in the development of the hut.</p>

<p>Policy 8 Design</p>	<p>This policy requires high quality design which meets high sustainability standards. As currently drafted the policy is weaker than City Plan policy S28. Is the intention to have a lower quality of design here than the “exemplary standard of sustainable and inclusive urban design and architecture” required by S28? Given that much of the area is covered by conservation area, the policy should reflect the requirements of section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to preserve and enhance the character or appearance of conservation areas.</p> <p>The objectives on page 73 contain confusing reference to the setting of the conservation area but not its character or appearance. Should the second objective be subject to the first objective? ‘Any development that affects the setting of a conservation area or any listed building’ should be amended to ‘any development that affects the character and appearance and settings of a conservation area and special interest of listed buildings...’ In this section it would be helpful if footnote references could be provided to acknowledge the statutory duties in relation to listed buildings/ conservation areas.</p> <p>The policy requires extensions and alterations to meet detailed guidance in an accompanying guide. We would question the statutory status of such guidance, and suggest that all requirements are set out within the plan itself. There are no provisions in the legislation for NP’s to produce the equivalent of a Supplementary Planning Document (SPD). It would be helpful if the council could be provided with a copy of the latest version of this document in order to provide comments.</p> <p>The policy then sets out fairly general requirements for shop frontages and signage, both of which are consistent with the development plan and it is not clear what additional policy application this provides. The same comments in respect of requiring a design guide to be taken account of apply to this element of the policy and supporting text.</p>	<p>This policy now states:</p> <p>Policy 6 Design Proposals for new developments must achieve an exemplary standard of sustainable and inclusive urban design and architecture that respects the scale and character of existing surrounding buildings. Design which meets high standards of environmental performance to mitigate for and adapt to climate change will be supported, subject to considerations with respect to the character of the area. New or renovated shop frontages should complement the architectural design of the rest of the building where that building has historic or architectural merit. Signs for shop fronts should be well-designed at a suitable scale, and if illuminated, should be lit appropriately and discreetly</p>
-------------------------------	---	--

	<p>The 3rd line of the justification paragraph should read ‘building’ instead of ‘build’</p>	<p>In 2017 the QPCC planning committee started discussions with WCC Head of Planning North and the Head of conservation and heritage and started to work on a new Planning Information Guide for The Avenues Conservation Estate.</p> <p>It is intended that QPCC should develop Planning Information Guides which will be appendices to the QPCC Neighbourhood Plan.</p>
<p>Policy 9 Improving Movement</p>	<p>Page 74 – the last bullet point of the objectives seems to be encouraging trading for shops on the forecourts outside their premises whereas the justification for Policy 11 seems to contradict the objective. This could be made clearer/more consistent. The council does not necessarily want to encourage the sale of goods on the public highway unless it is in an organised and licensed market</p>	<p>Policy 9 has been deleted</p>

	<p>environment and it should be clear that this activity is not always appropriate on the public highway. There is a current issue on the Harrow Road near the Prince of Wales and it can be difficult to enforce against the negative impacts on the streets street scene.</p> <p>The priorities set out in Policy 9 are noted however this reads more as a project list and it is not clear how they can actually be delivered through development that requires planning permission. We would recommend that these are moved to part 4 of the plan. The deliverability of these projects needs to be discussed with the council as highways owners and managers.</p>	
<p>Policy 10 Improving Cycling Structure</p>	<p>This policy seeks broadly for development to support measures to improve road safety and facilities for cyclists. This is covered in some detail by the Mayor’s cycle standards which would be applied in any case. The policy as written would be difficult to demonstrate it has been implemented because of the lack of specific requirements and would be open to unwelcome challenge. It is considered that the policy should be modified to be clear as to the relationship with the Mayor’s standards i.e. if these were applied, would the policy be considered to be met?</p> <p>It would not be reasonable for all development proposals to provide the facilities set out in this policy and there is no qualifying reference to what scale of development would be expected to deliver such facilities. The requirement should be ‘where appropriate’.</p> <p>It is also not clear what facilities are required under each bullet, for example what is equitable access? And should a development some distance from facilities be required to address access to local services – this does not appear reasonable and nor does development being required to provide cycle parking at services which may not be related to the development at all or be part of the developer’s land ownership and therefore enforceable.</p>	<p>This part of the policy has been deleted</p> <p>This policy is now Policy 7 and is titled Improving cycling infrastructure and reads:</p> <p>Development proposals, where appropriate, will be required to be supported by measures to improve road safety, air quality and facilities for cyclists, subject to the published cycle standards set out by the London Plan. Measures will be expected to:</p> <ul style="list-style-type: none"> a) Provide cycle parking at key services and facilities where appropriate b) Provide sheltered secure storage for residents where appropriate

<p>Policy 11 Improving Pedestrian Access</p>	<p>The policy requires existing highway space to be the maximum possible and improve accessibility for disabled people and those with pushchairs. The way the policy is drafted it would mean automatic refusal of any application to occupy the highway. This is not considered to be justified and may result in the refusal of applications that do not in fact cause negative impacts. It is considered that the approach should be to maintain pedestrian comfort levels to allow comfortable flow of pedestrians including those that have mobility difficulties or small children.</p> <p>Where relevant all development should take account of the importance of improving the pedestrian experience, including for disabled people and those with push chairs etc. It goes without saying that proposals which improve</p>	<p>This policy is now Policy 8: Safeguarding pedestrian access in Harrow Road and reads:</p> <p>Development proposals where appropriate, will be required to be supported by measures that provide for improved pedestrian access. The measures will need to demonstrate that:</p> <p>a) Sufficient pavement space is maintained for pedestrians and;</p>

	<p>pedestrian access should be supported so should the policy be stating that proposals must not affect unduly pedestrian access? The title of the policy should perhaps be 'safeguarding' instead of 'improving' pedestrian access. Part (a) should require that 'sufficient' space is retained for pedestrians as there are many cases where it is acceptable for some of the existing space to be occupied (eg. By tables and chairs/shop displays/bike racks etc which are supported elsewhere in the plan); the council would use the Westminster Way standards¹ to ensure sufficient space remains. For the reasons explained above, part (b) should state 'safeguards' instead of 'improves'. There are often conditions to prevent forecourt trading and this is a matter for highways enforcement as they also require a licence.</p>	<p>b) Accessibility for disabled people and those with pushchairs will be safeguarded. Proposals that permit the use of the pavement in front of shops up to the depth of 1m will be permitted</p>
<p>Policy 12 Retail and Commercial Development</p>	<p>The policy on retail and commercial development supports development that maintains or improves retail or commercial uses. It seeks improvement to Canal Terrace for workshops and offices. This is all consistent with the development plan.</p> <p>Policy 12 should be clearer that the part of the Harrow Road District Shopping Centre it is concerned with is only that portion which falls within the QPNP boundary.</p> <p>Negative wording to state that that development would not be permitted should not be included.</p> <p>It should be clear in the second part of the policy that this does not include the conversion of ground floor uses which are currently in Class A1 retail use as this would be contrary to Westminster's City Plan policy S21. The inclusion of the sketches and visuals by Syte Architects can be misleading as planning permission has not been granted for these works. The potential to change the use of these properties under the GPDO should also be acknowledged. The part of the policy dealing with the Canal Terrace should allow for change of use to residential in the case of long-term vacancy and reasonable attempts to let, as City Plan policy</p>	<p>This is now Policy 9 Retail and Commercial Development and reads: Proposals for development will be supported that maintain or improve retail and commercial uses within the defined core and secondary shopping frontages in Harrow Road District Centre (the part that falls within the Neighbourhood Plan area) and Kilburn Road Local Centre.</p> <p>The area defined between 431 and 487 Harrow Road is called Canal Terrace. Discussions are still on going about what it should be named. There is a strong view amongst the QPCC planning committee that the terrace from 439-487 had failed as a shopping parade. One owner/ manager who</p>

	<p>S21 does. There is a need to consider whether this policy is likely to be effective and deliverable – the map on pages 62-63 shows that 6 out of 25 units in the terrace are currently vacant, and of the rest all about five have already gone to residential. National policy set out in paragraph 22 of the Government’s National Planning Policy Framework is that planning policies should avoid the long-term protection of employment sites where there is no reasonable prospect of a site being used for the purpose – in which case applications for alternative</p> <p>uses should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.</p> <p>There is a further policy clause about additional car parking capacity to access the retail and commercial activities. There is some concern about this as new car parking for commercial uses is not encouraged (see saved UDP policy TRANS25). This needs to be explored further to identify the need and perceived benefits that are being sought, and the ways in which the QPCC envisage this additional capacity would be provided (e.g. on-site car parking buildings, on-site parking or on-street parking are all examples). Creating more parking on the carriageway may have adverse impacts on servicing, buses, cycling and walking and air quality. The document covers all of this on page 87 but it is not clear how it fits together. Included with these comments below is a slide from a recent training event that the council’s Highways officer attended and which may be useful for QPCC’s discussions/policy development around these competing issues.</p>	<p>has been working there for over 20 years and whose office is adjacent to the terrace says that between 439 and 487 most have been residential for decades</p>
<p>Policy 13 Grand union Canal Narrow Boats</p>	<p>Page 79– The opening sentence is perhaps misleading as most of Westminster is built up but that does not mean that there are not opportunities for redevelopment, infill and intensification of residential uses where appropriate.</p> <p>The second paragraph on page 79 talks about an ambition to diversify the accommodation offer within the area – What does this mean? Does it mean to</p>	<p>This is now Policy 10 and is called: Residential Development and reads <i>Residential development</i></p>

	<p>introduce intermediate housing and possibly some private too? It would be helpful if this, and any reasons for it, was clearly stated.</p> <p>This policy gives unequivocal support for the permanent mooring of barges. Whilst this does not specifically give rise to any general conformity issues, the community council should give consideration as to whether they want any criteria to manage the impact, including the necessary infrastructure to service the houseboats. Proposals should be discussed with the Canal and Rivers Trust who own the canal.</p> <p>The title of the policy only refers to canal boats however there is also a reference to infill development around the BT Building and Queens Park Court in the policy. Perhaps they should be separate policies or else the title of the policy changed. The evidence base should also show that such development is viable in these locations. It is highly aspirational that any such housing would solely be for 'affordable' housing and whilst the council would not necessarily oppose such development it would not be in conformity with strategic development plan policies, or the national planning policy framework, to require it.</p> <p>One of the objectives is to resist the subdivision of family units but this is not followed through in the policy.</p> <p>The last paragraph of the Justification for Policy 13 is not really justification – it reads more like policy. However there may be potential issues with such a policy because of the 10% affordable home ownership requirement proposed in the Housing White Paper, and the preferences of the Mayor for tenure split which have a strong influence over what is asked for in Westminster. This is not to say that the NP cannot indicate a strong preference for what they would like to see if they have evidence to justify why. The objectives include protecting social rented housing stock, affordable housing, protecting family sized units (and intermediate tenure units however none of these are included within the policy itself.</p> <p>⌘</p>	<p>Proposals for narrowboats to be permanently moored for residential use on the Grand Union Canal will be supported, subject to meeting the following criteria:</p> <ul style="list-style-type: none"> • Demonstrate that there will not be an adverse impact on the amenity of neighbouring uses/buildings; and • Ensure that any necessary infrastructure required to service the boats will be provided. <p>Proposals for infill development that include provision for affordable residential dwellings will be supported, subject to the schemes:</p> <ul style="list-style-type: none"> • Being of high-quality design; and • Providing sufficient amenity space for inhabitants, including the provision of open space and play space. • Ensuring they are sympathetic to the character of the area where they are located.
--	---	--

Part 4	<p>It would be helpful if there was an introduction to this section to explain how the QPCC envisage that these 'projects' will be delivered. Is it envisaged that potential neighbourhood Community Infrastructure Levy (CIL) receipts would fund some of these works?</p> <p>In respect of Development Project 3 please note the earlier comments on the status of the UDP.</p>	Part 4 has an introduction that shows how QPCC will deliver this project
Appendix A Retail and Queen's Park High Street	<p>This section includes a shop with fruit and vegetable goods on display as what works well. These stalls on the highway require planning permission which reduces the pavement space (contrary to what the plan refers to in other parts on pedestrian movement). When the council considers applications for such displays there is no control over what goods are put on display and as such, while fruit and vegetable stalls look attractive, they could be used for any sort of produce which might not be so attractive (and this is already an issue elsewhere along the Harrow Road and elsewhere as evidenced by Photo 1 on page 91 and Photo 1 on page 95).</p> <p>Cycle hangers are not appropriate in every location (also referenced on page 57). They need to be sited and designed taking into account townscape, amenity and highways considerations which should be referenced in text. For example, there may be an impact on pedestrian movement and parking.</p>	<p>The stalls and what is sold remains a major issue for residents. They would like a design guide for the Harrow Road and rules that led to a great range of shops and activities in the high street</p> <p>QPCC recognises this</p>
Other comments	Have QPCC considered nominating The Flora at 525 Harrow Road as an Asset of Community Value?	QPCC applied in April 2017 to Westminster for the Flora to be an Asset of Community Value but their application was refused.

	<p>The character areas map could demonstrate a broader understanding of character. It could usefully recognise character as combination of land use and built form. i.e. the original estate has quite different character to later estates as evidenced by building heights map. There are other historic Victorian areas outside the conservation area which could also be identified in terms of the character of their built form and contribution to townscape.</p> <p>Conservation & Heritage section (p38/39): The conservation and heritage map could include the properties subject to the Article 4 Direction. There is no mention of the heritage value of the areas beyond the conservation area boundary.</p> <p>Development Context section (p.40/41): The list should be updated to include Bales College, Harrow Road; Hathaway House; WECH; Westbourne Bus Garage and the Crossrail site.</p> <p>There is nothing controversial with respect to trees in the draft plan. It identifies the importance of street trees and trees in the estates and in parks. It recognises the success of tree planting in the public realm over recently and aims to continue this within what appear to be realistic expectations, and in partnership with Westminster Tree Trust and WCC. Factually there is one error - that the mature London planes in the streets are pruned annually rather than every 3 years (p47).</p>	<p>As the Neighbourhood Plan has been developed so the different character areas have been identified and it is the intention of QPCC to develop guides for specific areas.</p> <p>This has been done</p> <p>None of these except for Bales College is in Queen's Park</p> <p>This has been corrected</p>
--	--	---

