

Overview and Scrutiny Committee

DATE: Tuesday 12 June 2012

To: All Members of the Overview and Scrutiny Committee

Cc: Members' Library

Agenda Item No.

AGENDA - PART I

8. DEVELOPMENT PLAN DOCUMENTS (DPD)

Schedules and Appendices to the following reports of the Corporate Director of Place Shaping are attached

- (b) Pre-Submission Development Management Policies (Pages 1 - 308)
- (c) Pre Submission Site Allocations DPD (Pages 309 - 624)
- (d) Revised Local Development Scheme (Pages 625 - 642)
- (e) Revised Proposed West London Waste Plan: Pre-Submission Consultation Document (Pages 643 - 708)

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

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

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

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

4 004 1

You will be aware that our client has made various representations to emerging policy documents over the years, including the Submission Draft Harrow Core Strategy and the other emerging Development Plan Documents (DPD's). Dandara welcome the opportunity to comment on the Draft Development Management Policies (DDMP DPD). Prior to do so, we would be grateful if the Council could clarify that policies contained within the DDMP DPD do not relate to sites within the Harrow and Wealdstone Intensification Area. The Area Action Plan (AAP) associated with the Intensification Area outlines that:- "Overall, the aim of preparing the AAP is to have a single, statutory plan, that provides clarity and certainty to landowners, developers, service providers and the community about how places and sites within the Intensification Area will develop, and against which investment decisions can be made and development proposals can be assessed". (para. 107 of the AAP). We agree that the AAP should be the single, statutory plan which contains the policies required to guide development within the Intensification Area. If this is the Council's intention, the DDMP DPD must clearly state that the policies contained therein do not relate to proposals within the Intensification Area. Notwithstanding that the DDMP DPD may not be of relevance to proposals for the College Road site as this is located within the Intensification Area, we have a number of comments on the emerging draft document. For ease of reference, we will comment upon each policy in turn.

It needs to be clear that the DMP DPD includes policies to be applied to the Borough outside the proposed H&W IA only

Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.

5 005 1

Context to Representations A I draw your attention in particular to the policy background which supports the provision of policing. It is essential to ensure that the LPA understand the planning policy background which supports the MPA/S' representations. Provision for policing and supporting the MPA/S' objectives is a key strategic requirement in order to ensure that safe and secure communities are developed across the London Borough of Harrow. A Relevant Planning Policy A National & Strategic Policy A PPS1 - paragraph 27 (iii) development plan preparation the need to promote communities which are healthy, safe and crime free is confirmed. PPS12 - requires emerging development plan policy to be consistent with the adopted development plan and 'soundness' requires DPD policies to be consistent with national policy. Adopted London Plan (2008) - Policies 3A.17, 3A.18, 3A.26, 3B.4, 4B.6 and supporting text ref 3.99 support the provision of relevant social infrastructure, which specifically refers to policing within its definition. Emerging London Plan (2009) - further reinforces the need for adequate policing facilities across London within Policies 2.6, 2.13, 2.15, 3.17, 4.4, 4.6, 7.3 & 7.13. A It is clear therefore that a planning policy framework exists at National and strategic levels that protects and promotes policing as a community use. Government guidance within Planning Policy Statement 12 (PPS12) states that Local Development Framework Documents should reflect the strategic development plan (Para 4.2). The policy context above identifies the requirement for policing needs to be taken into consideration in the formulation of local policy documents and as such it is important for relevant policies to be reflected within the emerging Development Management Policies DPD. The MPA/S are mindful that significant additional development is likely to come forward within Harrow, through the introduction of new uses and the intensification of existing uses. The scale of development will increase demands on police resources, and the MPA/S request that the impact upon policing be regarded as a material consideration during the application determination process and reflected within the emerging development plan document.

The MPA/S request that the impact upon policing be regarded as a material consideration during the application determination process and reflected within the emerging development plan document.

The impacts on essential services are a material consideration in planning applications, however it would not be appropriate to list all of these here. The need for increased provision of essential infrastructure as a result of development is covered in Harrow's Core Strategy.

6	006	1.1	<p>The GLA notes the Council's intention that this DPD should set out development management policies in all parts of the borough, except for the Harrow and Wealdstone Intensification Area, where development management policies will reside within the Harrow and Wealdstone Area Action Plan. Officers do not have an objection to this approach, however, the Council should think carefully about how this relationship would work, and use clear cross-referencing between DPDs to avoid repetition, while ensuring clarity for the reader. The Council may wish to express the spatially specific nature of the Development Management Policies DPD and the Harrow and Wealdstone AAP diagrammatically at the start of this document to provide clarity to the reader. A borough map, shaded to indicate where development policies within each DPD would apply, should simply and quickly express the relationship between these two documents.</p>	<p>The Council may wish to express the spatially specific nature of the Development Management Policies DPD and the Harrow and Wealdstone AAP diagrammatically at the start of this document to provide clarity to the reader</p>	<p>Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.</p>
3	007	1.2	<p>Paragraph 1.2 of the consultation document confirms that the role of the DMP DPD is to provide "detailed local policies for the management of future development outside of the Harrow Intensification Area. Within the Intensification Area, the policies of the Harrow and Wealdstone Area Action Plan will fulfil this role." Land Securities welcomes this statement, but considers that it would be beneficial (for the purposes of clarity) to confirm that the DMP DPD therefore does not apply to sites within the Harrow and Wealdstone Intensification Area.</p>	<p>It would be beneficial (for the purposes of clarity) to confirm that the DMP DPD therefore does not apply to sites within the Harrow and Wealdstone Intensification Area.</p>	<p>Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.</p>

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

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

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

3	016	2.1	<p>Paragraph 2.6 of the consultation document confirms that the Council will encourage new-build development to be secured on previously developed land, but that an exception to this may apply to "ancillary development necessary to support appropriate uses within Green Belt, Metropolitan Open Land and open space and to residential dwellings with garden space". It is noted that open space is not subject to the same restrictions in planning terms as Green Belt and MoL land, and this should be made clear within the text. Paragraph 2.22 of the draft DMP DPD confirms that the Council will apply policy on design considerations to all new development to respond to the local context. It is considered that this sentence should refer to all new development in areas of the Borough outside the IA.</p>	<p>Open space is not subject to the same restrictions in planning terms as Green Belt and MoL land, and this should be made clear. Should refer to all new development in areas of the Borough outside the IA.</p>	<p>In line with Harrow's Core Strategy, all development on any type of Open Space will be resisted including residential development on garden land, excepting necessary ancillary development.</p>
9	017	2.1	<p>In para 2.6 the final part of the exceptions "and to residential dwellings with garden space" is inconsistent with the Core Strategy and other parts of the Development Management DPD which state clearly that residential gardens will be protected from new-build development. As such, this final exception should be deleted.</p> <p>Section 2 - Protecting Harrow's Character and Residential Amenity: 2.1: there is a "typo" in the second bullet point - "... are as ..." should be "... areas ...". In general The Pinner Association strongly agrees with the aims and aspirations of this section, especially paragraphs 2.2, 2.3, 2.5, 2.6, 2.22 and 2.26, and Policies 1, 2, 3 and 4.</p> <p>Chapter 2.2.2 Should say "a high standard of design" 2.4 See below (6.4) for min internal space standards.</p>	<p>Omit and to residential dwellings with garden space</p> <p>Typos</p> <p>Grammar</p>	<p>In line with Harrow's Core Strategy, all development on any type of Open Space will be resisted including residential development on garden land, excepting necessary ancillary development.</p> <p>The document has been re-written, retaining the aspirations supported.</p> <p>This section has been re-written.</p>
10	018	2.1			
11	019	2.1			

077 Policy 1

The introduction to Policy 1 is welcomed in that the DDMP DPD encourages the highest standard of urban design for new development appropriate to its local context whilst acknowledging that in some instances, it may not be required to reflect the character of the surrounding area in terms of built form. Paragraph 2.2 sets out that "a contemporary form of architecture may be suitable in appropriate locations such as regeneration or intensification areas to create an identity or a landmark feature". The College Road site is located within the Intensification Area in an area that the Harrow and Wealdstone Area Action Plan describes as "unimpressive with few opportunities for orientation" (paragraph 4.27). Indeed the Secretary of State in his conclusion on the appeal proposals relating to the College Road site (PINS Ref. APP/M5450/A/09/2115461, dated 22 nd July 2011) stated:- " I consider that well-designed buildings, marking the town centre rather better than any of the existing buildings, could enhance rather diminish the value of views".

Therefore, we are of the view that the College Road site is an opportunity to deliver a contemporary form of architecture with a tall building element which will not only lead to the redevelopment of the former post office site but will regenerate this unimpressive area. It is our view that Policy 1 should be reworded to remove any ambiguity that a site has been identified to provide a landmark feature within the Intensification Area that could provide orientation for users of the town centre. The College Road site should be named as such within policy or the supporting justification. In line with the Replacement London Plan, Policy 1 seeks to optimise the potential of sites. This is welcomed by Dandara given that the intention is to maximise the opportunity to deliver development on their College Road site. However, it is important that policy and subsequent decisions do not place undue emphasis on an arbitrary density figure. With regard to the College Road proposal in respect of density, the Inspector and Secretary of State thereafter, established that the density of the appeal proposals for College Road was acceptable. The Inspector focused less so on the actual density and more so on whether the design and visual impact of proposal is acceptable. The Inspector concluded that:- " If the design and visual impact of a proposal is acceptable then it follows, in my opinion, that the density of the scheme is acceptable. If they are unacceptable, then I consider that the scheme should be rejected whether it not its density would be within acceptable limits". Policy 1 goes on to set out that the Council expects a design-led approach to be taken to sustainability measures to be incorporated. We would suggest that this element of the policy should read appropriate sustainability measures to be considered and not incorporated

Policy 1 should be reworded to remove any ambiguity that a site has been identified to provide a landmark feature within the Intensification Area that could provide orientation for users of the town centre.

Flexibility on sustainability

Disagree. Sustainable development and energy efficiency forms and integral part to new development and will be sought in line with national requirements – flexibility in the choice of measures incorporated is therefore provided for.

5	078	Policy 1	Policy 1 seeks to optimise the potential of sites in order to create an inclusive environment that respects the character and setting of neighbouring development, the wider landscape and adds to the visual amenity of the place. The MPA/S support the reference to the Metropolitan Police initiative: 'Secured by Design'.	None	Support noted
8	079	Policy 1	A This Policy is welcomed, especially in relation to the provision of integrated landscaping as part of proposals, having regard to the enhancement of biodiversity. The Council has set out a clear policy for the incorporation of biodiversity enhancement as part of an inclusive development proposal/planning application and this is to be commended and encouraged. It is good that the first two aspects to be considered in respecting, inter alia, the wider landscape and the views associated with the site are scale and height, bulk & massing. However, it should be made much clearer that applications for developments far exceeding the height and/or mass of existing surrounding buildings will not be approved.	None	Support noted.
17	080	Policy 1		Applications for developments far exceeding the height and/or mass of existing surrounding buildings will not be approved	Policy revised to fully take account of surrounding heights and massing.
18	081	Policy 1	At present the Policy 1 Design of Development seeks to provide a broad criteria approach to the consideration of all development proposals, however it does not consider specifically tall buildings. We would suggest that as part of the Borough is being promoted as having the potential to accommodate tall buildings (i.e. Core Strategy), that greater clarity is provided on how these types of development will be assessed. With this in mind we would suggest the criteria based approach advocated in the EH/CABE Guidance on Tall Buildings (2007) (section 4.1.1-4.1.11) is reviewed and incorporated into Policy 1. This approach of greater clarity would ensure that this policy and the Development management document comply with PPS1 and PPS5. Policy 1 "historic context The policy lacks specific reference to new designs respecting the historic context of the site and its surroundings. This is an unfortunate omission, especially as PPS1 promotes the need for developments to be integrated in to the existing urban form and the natural and built environment. However in order to achieve this aim, it is essential to understand the historic context and its contribution to the environment now and in the future (PPS5 Policy HE7)	Clarification on tall buildings.	The Core Strategy highlights that the Intensification Area is most appropriate for taller buildings, therefore the Area Action Plan contains the policies necessary to manage them. The design policies in this DPD have been amended to provide clearer guidance outside the IA.

4	082	Policy 2	<p>Policy 2 - Protection of Identified Views and Landmarks</p> <p>Policy 2 seeks to protect identified views and landmarks as identified on the Proposals Map. The policy goes on to outline that the Borough will exercise stringent controls over height, location and design of any buildings which might potentially impact on these views and landmarks. The DDMP DPD provides the following justification for this policy- Harrow possesses some of the most imposing landmarks and attractive skyline ridges and adds significant views to the quality of the local landscape; & Poorly designed buildings can intrude on these views and would detract considerably from a key characteristic of the Borough. It is appreciated that there are important landmarks and views which the Council are seeking to protect but the wording of Policy 2 is considered to be overtly negative and inappropriate. The current wording suggests that new development will inherently have an unacceptable impact upon identified views and landmarks. As recognised within the London View Management Framework at a regional level, and by the current Secretary of State at a site specific level, this is not the case. Indeed, the London View Management Framework sets out that " new development should make a positive contribution to the characteristics and composition of the Designated Views" . The London Borough of Harrow should equally be embracing such development positively. Unlike Policy 2, it does not imply that new development will not be permitted. We would reiterate a quote from the appeal decision referenced earlier in this representation where the Secretary of State stated:- " I consider that well-designed buildings, marking the town centre rather better than any of the existing buildings, could enhance rather than diminish the value of views".</p> <p>The Secretary of State goes on to state:- "there is nothing inherently wrong in being able to see a piece of high quality architecture, even a tall one, within a densely urban scene, and that whilst there would be a significant change in views, it is important not to conflate visibility and harm" .</p> <p>It is our view that Policy 2 does conflate visibility and harm. The policy should be reworded in such a way that it seeks to protect and enhance the place from which the view is seen as per the approach taken in the London View Management Framework. Moreover, the wording of policy in respect of "impact" might potentially impact on these views and landmarks' is ambiguous and needs to be quantified to make the policy sound. The use of words "stringent and "impact" must be removed. Only where proposals have a detrimental impact should they not be permitted. Indeed, from a site specific perspective, it follows that the current wording of Policy 2 has little regard to the Secretary of State's view in the appeal decision which confirmed the acceptability of a tall building on the College Road site. Indeed, policy must acknowledge the overall conclusion on the appeal proposal which clearly stated:- "I find no objection to the principle of a tall building (or buildings) on the appeal site (up to the height proposed in the appeal scheme)".</p> <p>It is evident from this statement that a tall building of up to 19-storys on the College Road site has been accepted by the current Secretary of State. Nevertheless, Policy 2 seems to re-open the</p>
		The policy must reflect the current Secretary of State's decision.	<p>The Secretary of States decision is reflected in the Core Strategy, and the Area Action Plan acknowledges the site as being acceptable for a tall building. The policy in this DPD has been amended following a new Views Assessment evidence base study to reflect its findings based on the London Views Management Framework.</p>

17	083	Policy 2	This is an excellent and vitally important statement of Council policy. It must be adhered to rigorously, especially with regard to St Mary's Church. A Policy 3: Shopfronts and Signs Natural England does not wish to offer any substantive comments in respect of this Policy except to have regard to Planning Policy Guidance 19 - Outdoor Advertisement Control, especially in relation to MOL, Green Belt or designated nature sites. Paragraph 2.22 of the draft DMP DPD confirms that the Council will apply policy on design considerations to all new development to respond to the local context. It is considered that this sentence should refer to all new development in areas of the Borough outside the IA.	None	Support Noted
8	084	Policy 3		Wording change	Policy revised to be in conformity with the NPPF.
3	020	2.22		This sentence should refer to all new development in areas of the Borough outside the IA.	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA Support Noted
6	021	3	Supported, no specific comments.	None	Support Noted
10	022	3	Section 3 - Conservation and Heritage: A In general The Pinner Association strongly agrees with the aims and aspirations of this section, especially paragraphs 3.2 and Policies 5, 6, 7, 8, 9, 10 and 11. A In section 3.6 (third bullet point) hedges should be included as specific items for protection, as they are very important to the street scene in many Conservation Areas, and permission should be required for their substantive modification or removal. We support paragraphs 3.15 to 3.21 inclusive (protection for Locally Listed buildings), especially the clauses against the demolition. A We strongly agree with the justifications in paragraphs 3.28 and 3.29.	Hedges should be included as specific items for protection	Support Noted Hedgerows are protected by legislation, much like TPOs.
12	085	Policy 5	Policy 5 (follows para 3.3) promises that the Council will continue to "identify and publicly document heritage assets". It would be helpful to indicate where this document is to be found, and its date; this should cover both nationally and locally listed buildings, complementing the assets already listed in the chapter.	Wording change	Clarification on where information can be found now included.

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

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

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

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

written to take into account

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

concerns.

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

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

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

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

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

15	097	Policy 13	We note that Policy 13 requires that all development proposals are required to demonstrate to the Local Planning Authority that Sustainable Drainage Systems have been incorporated into the design under the proposal. We note that in not all instances are Sustainable Drainage Systems able to be accommodated. All sites are different, and have differing existing ground conditions or existing infrastructure. It will be beneficial if Policy 13 could be specifically re-worded to include a reference to where Sustainable Drainage Systems cannot be included in development proposals that a clear justification is provided to accompany the proposals. This justification should include (but not restricted to) the site specific circumstances, what is reasonably able to be delivered, overall development viability, and other site specific practical or technical considerations.	Flexibility in the consideration of SDS in new developments.	Flexibility in measures to achieve a reduction in flood risk incorporated into policy
13	029	4.5	We are pleased with the wording in Section 4.5 that supports the use of SDS to achieve the SDS objectives highlighted in Harrow's SFRA. This will encourage the use of the most sustainable SDS techniques.	None	Support noted
3	098	Policy 14	With regard to the draft environmental policies within this chapter, it is considered that it needs to be made clear within the introductory text on page 32 that the subsequent draft policies apply to sites within the Borough outside the IA boundary. Draft Policy 14 seeks the protection of river corridors and watercourses. This policy states, inter alia, that all new development shall maintain a minimum 8 metre wide undeveloped buffer zone from all ordinary watercourses and designated main rivers within the Borough. There may be instances where the Environment Agency agree to a lower buffer zone (i.e. under 8 metres) and hence for flexibility, it is suggested that "unless otherwise agreed with the Environment Agency" is added to the text of the policy.	Clarification on IA. Flexibility in buffer zone.	Justification amended to include buffer limit to be agreed by EA if not 8 meters
4	099	Policy 14	Á Policy 14 sets out that "all new development shall seek to make space for water". We have reviewed the justification for the policy and remain unclear on what the policy is seeking to achieve and what is required by "all new developments", particularly as it goes on to discuss watercourses and Main Rivers. If this policy is to remain in the emerging DPD, we would recommend that it is reworded to provide developers with clarity on this issue and a degree of flexibility must be introduced. For example, we do not believe that the College Road site should make space for water given its town centre location.	Clarity	Policy re-worded for clarity
8	100	Policy 14	Á Natural England welcomes this policy especially in relation to the protection and enhancement of local biodiversity and wildlife corridors.	None	Support noted

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

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

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

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

8	037	5.1	<p>Paragraph 5.1 refers to the preservation of open spaces and promotion of the Green Grid which is welcomed and encouraged, the Council should also seek to increase the provision of open space and biodiversity, where appropriate, and especially in areas of deprivation for access to nature. A In respect of new development opportunities and in order to ameliorate issues of deprivation to access to open/green spaces the Council may wish to consider Natural England's ANGST (Accessible Natural Green Space standards), which should be referenced in the Core Strategy for the Borough and a link to this can be included within this document. A Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system: A No person should live more than 300 metres from their nearest area of natural green-space; There should be at least one accessible 20 hectare site within 2 kilometres; There should be one accessible 100 hectares site within 5 kilometres; There should be one accessible 500 hectares site within 10 kilometres.</p> <p>We strongly agree with paragraph 5.1 and trust that this aim will be adhered to in all future planning decisions Paragraph 5.2 - any development should be very small and only allowed if absolutely necessary.</p>	<p>Wording change</p>	<p>Disagree. The Council does not consider national ANGST standards to be applicable to a London Borough. Harrow's PPG17 study sets out appropriate local standards that seek to increase the provision of areas of nature conservation and natural and semi-natural green spaces.</p>
10	038	5.1	<p>None</p>	<p>None</p>	<p>Support Noted</p>
7	113	Policy 19	<p>The RNOH welcomes this policy which acknowledges the national importance of the hospital and its contribution to the local economy. The Council has already recognised the very special circumstances relating to the redevelopment of the RNOH, which is proceeding in phases as a PFI scheme.</p>	<p>None</p>	<p>Support Noted</p>
12	114	Policy 19	<p>Policy 19 There should be a distinct policy for Metropolitan Open Land as opposed to Green Belt as it is generally more urban in setting and, for example, is more suitable for playing fields with modest buildings than the more rural Green Belt.</p>	<p>Distinction between MOL and Green Belt</p>	<p>Disagree. The Council considers MOL the same as Green Belt, as referred to in Para 5.5.</p>

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

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

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

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

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

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

22	136	Policy 26	<p>Á Policy 26 - Sport and Recreation Support with amendment Sport England welcomes the inclusion of Policy 26 - Sport and Recreation. However, within Appendix E: Evidence Base and Strategies of Harrow's Core Strategy reference is made to the Harrow PPG17 Open Space, Sport and Recreation Study 2011. Therefore reference needs to be made to the Harrow PPG17 Open Space, Sport and Recreation Study 2011 in order to demonstrate that there is an evidence base that supports the policy.</p> <p>Policy 27 - we disagree with this policy as no development of actively used allotment sites should be allowed (it is impossible to "relocate" an allotment into which years of effort has been expended). If it is deemed that an allotment site is no longer in sufficient use then it should revert to a public open space.</p>	<p>Reference to PPG 17 study</p>	<p>Reference to this study is now included.</p>
10	137	Policy 27		<p>No loss of allotment</p>	<p>The Harrow Core Strategy contains a presumption against the loss of open space and of garden land, and so the policies in this DPD will be in conformity with that presumption</p> <p>Support noted</p>
8	138	Policy 29	<p>Á Natural England commends and encourages the Council in requiring details of potential effects on biodiversity to be demonstrated in such applications.</p>	<p>None</p>	
12	139	Policy 29	<p>(follows 5.27), the justification, in 5.28 should be strengthened by inserting "only" after "permitted" in the first sentence.</p>	<p>Wording change</p>	<p>Policy re-worded</p>
13	140	Policy 29	<p>We support this policy.</p>	<p>None</p>	<p>Support noted.</p>
6	044	6	<p>The Mayor's draft replacement London Plan recognises that there may be scope for a more dispersed distribution of student accommodation in London. On this basis, the Council should consider whether it would be appropriate to include a policy for the promotion of student accommodation within this DPD. Whilst the Mayor is not proposing a specific student accommodation benchmark for Harrow the draft replacement London Plan, the borough is accessible to parts of central London, and could provide a suitable location to help maintain London's status as a world city for higher and further education. GLA officers would welcome the opportunity to discuss this matter with the Council if required. The Council may also wish to consider how student accommodation would contribute to mixed and balanced communities.</p> <p>Natural England has no substantive comments to make on this chapter, however, we refer to our earlier comments with regards to ANGST standards above.</p>	<p>Consideration of student accommodation</p>	<p>Not required. In liaison with the GLA in the development of the SHLAA, this subject was not raised.</p>
8	045	6		<p>None</p>	<p>None</p>

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

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

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

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

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

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

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

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

We note from recent review, and our simultaneous representation submitted to the Harrow and Wealdstone Area Action Plan Consultation, that at paragraph 7.3 reference is made to the London Plan designated Strategic Industrial Locations which includes the local designation of the Wealdstone Industrial Area as a "Preferred Industrial Location". Paragraph 7.3 goes on to identify Honeyput Lane in Stanmore as an identified "Industrial Business Park". The last sentence of paragraph 7.3 advocates that other smaller industrial sites across the borough are defined as "Industrial Business Use Areas". There appears to be no reference in Chapter 7 of the fact that the Harrow and Wealdstone Area Action Plan is being prepared to be directly and specifically responsible for setting policies within the intensification area. This should be included. We note that Policy 35 is the first employment and economic development policy proposed and this deals with "Industrial Business Use Areas". As discussed above these are defined as other smaller industrial sites across the borough. There appears to be no policy to control development on either "Industrial Business Park" or the "Preferred Industrial Location" as defined. From discussions with officers, the Wealdstone Strategic Industrial Location (referred to as the Wealdstone Preferred Industrial Location in the UDP) was designated by the GLA as a Strategic Industrial Location (SIL) in the London plan, and based on interpretation of the GLA designation, currently includes various industrial sites in Wealdstone including: British Rail Goods Yard, Barratt Way Industrial Estate, Christchurch Industrial Estate, Cliveden Centre, Crystal Centre, Hawthorn Centre, Kodak Site, Palmerston Road, Rosslyn Crescent, Waverly Industrial Park, Whitefriars Industrial Estate and the ColArt Site. A From recent discussion with Officers at your Council, we have been advised that the GLA has recently reviewed/reassessed the SIL's in the London Plan and consider the Wealdstone SIL requires amendment and that the Council is being encouraged to review their Wealdstone Preferred Industrial Location accordingly - through the Area Action Plan (to now only designate the Kodak Site and the Waverley Industrial Estate). We consider that the AAP represents the perfect opportunity to review the Wealdstone Preferred Industrial Location, and agree that the amended boundary should reflect the recent discussions with the GLA regarding the SIL. We consider that the review should be evidence led and have regard to the findings of the employment land review which ranks the Industrial Sites within the borough including those sites contained within the Wealdstone Preferred Industrial Location in order of quality of employment land and space. Those sites which rank highly should obviously be given priority over those sites which rank policy. Officers have advised that this issue will be considered in the second round of consultation on the Area Action Plan which is expected towards the end of this year, and we suggest that this approach is carried through in tandem in the Development Management DPD, given that these two DPD's are inextricably linked.

Reference to IA. Policies to be specific.

Policies revised to cover all types of employment land. SIL designation revised as part of the Area Action Plan revision.

3	158	Policy 35	Draft Policy 35 and its supporting text within paragraphs 7.11-7.16 relates to Industrial and Business Use Areas as defined on the Proposals Map. It is considered that it should be made clear within both the policy and the accompanying text that both relate only to sites within the Borough outside the IA boundary.	IA not relevant	Whilst this DPD applies primarily outside the IA, some policies will also be used in the IA. This is stated in the introduction. To avoid duplication of this information, the AAP will identify those policies within this DPD that will be applicable to development in the IA.
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5	159	Policy 35	<p>Policy 35 - Industrial and Business Use Areas This policy sets out those uses which will be considered appropriate within Industrial and Business Use Areas. The MPA/S have identified the potential of relevant employment sites in helping them meet the goals of their estate strategy. In particular, the provision of patrol bases, custody centres and relevant pan-London policing facilities are vital to the successful implementation of the MPA/S' estate strategy. The nature of these uses are similar to that carried out on most employment sites and therefore are ideally suited to employment sites and similar locations. Whilst falling outside the 'B' Use Class definition, these policing facilities are employment-generating uses. Generally the policing uses represent no material alteration from an Employment (B1) or Warehousing (B8) use as they possess an employment density similar to or in excess of 'B' Class uses. Vehicle movement will also be similar to a typical employment/industrial use. These facilities do not require continued public access and therefore have no requirement to be located in town centre areas. This approach is supported by the strategic development plan within Policy 3B.4. 'Industrial Locations' which states that policies in DPD's 'should develop local policies and criteria to manage industrial sites having regard to helping meet strategic and local requirements for... social infrastructure.' Furthermore, Policy 2.17 of the Emerging London Plan defines inter alia 'other industrial related activities' as being acceptable within Preferred Industrial Locations. Mindful of the above and in order to comply with strategic policy in this regard, reference should be made within Policy 35 to the provision of other employment-generating uses as appropriate alternative uses on employment sites. The MPA/S therefore recommend that an additional bullet point be added to Policy 35 as follows (additional wording underlined):- Where employment densities are similar to existing, Industrial and Business Use Areas may also accommodate alternative employment-generating uses, including facilities for emergency services.</p>	Reference to the provision of other employment-generating uses as appropriate alternative uses on employment sites.	Provision for essential infrastructure is supported through the Core Strategy. Policy amended to reflect this. The London Plan also supports the use of industrial land for emergency services uses.
6	160	Policy 35	<p>The content of this policy is supported. However, the Council should clarify whether it is the intention of this policy to cover Strategic Industrial Locations (SIL) and local industrial / business areas, or, only the local ones. The GLA would not object to the Council using draft replacement London Plan policy 2.17 to deal with SIL, however, adequate cross-referencing must be provided to inform the reader of this.</p>	Clarification required.	Policy revised to incorporate all employment land.

24	161	Policy 35	<p>Workspace supports the proposed uses within industrial and business area, however, it is considered that this policy fails to reflect a number of key economic areas and is consequently not flexible to meet the economic needs of this part of outer London. The issues that should be raised within this policy are considered below: Small and medium sized enterprises It is recognised that small and medium sized enterprises are referred to in the supporting text, however, the actual policy does not reference them and its rigid approach to economic development fails to understand the markets in which small and medium sized enterprises work within. Consequently, small and medium sized enterprises should be actively encouraged in such locations. However, for this policy to be successful it will need to: take account of the locational needs of these enterprises; regeneration opportunities afforded by such enterprises; and how employment space for these enterprises could be delivered. Small and medium sized enterprises provide an important and significant contribution to the Outer London and Harrow economies. The potential economic and social benefits of promoting the development of small and medium enterprises include: The creation of jobs at low cost of capital; Contribution to the Gross Domestic Product (GDP); Expansion of the entrepreneurial base; Flexibility to adapt to market changes; Support for large scale enterprises; Entry into market niches which are not profitable for larger enterprises. All the above may never be fully realised if such enterprises are not encouraged throughout the borough including on industrial and business use area. Small and medium sized enterprises often operate within clusters and networks. Networking allows the small and medium sized enterprises to combine the advantages of smaller scale and greater flexibility with economies of scale and scope in larger markets - regionally, nationally and globally. The links take different shapes in which different firms join together to co-produce, co-market, or co-purchase, cooperate in new product development, or share of information. It is important that these clusters and networks are supported and developed by the provision of appropriate accommodation at a variety of locations. Small and medium sized enterprises have an important role in leading entry into emerging sectors that do not necessarily fit comfortably within the traditional planning use classes. It is important this policy flexible to encourage the economic development of small and medium sized enterprises regardless of use class. For example, small and medium sized enterprises are particularly strong in developing the art and cultural sectors, which struggle to find suitable premises due to planning land use class restrictions. Such enterprises often have to compete with Class A occupiers, which prevents their development on cost grounds. This space is often not appropriate and the planning use class system is too rigid in which to support their growth. Enabling Development This policy is not flexible and does not take account of the future economy and potential for future economic development. As currently written, this policy is ineffective and could prevent land from being utilised for more effective land uses. This policy should allow the redevelopment of inefficient employment areas for mixed-use developments that incorporate modern and flexible employment floorspace for small and medium sized enterprises. New employment floorspace will help sustain existing employment use at such sites and enables sufficient flexibility and building quality to secure its continued use in the longer term. This will provide benefit in</p>	<p>Not flexible to meet the economic needs and to support SMEs.</p> <p>This policy should allow the redevelopment of inefficient employment areas for mixed-use developments that incorporate modern and flexible employment floorspace for small and medium sized enterprises</p>	<p>New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amenity</p>
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24 161 Policy 35

CONT... thriving markets. To regenerate under-used and inefficient employment floorspace a higher-value use is often required to enable development. The associated higher-value land use as part of a mixed-use development will secure the delivery of this employment floorspace. Without this higher value element, the redevelopment would be unviable. This approach can deliver increased economic efficiencies by increasing the economic output of an area and can also deliver much needed housing. Workspace have successfully adopted this approach at variety of sites across London. This approach is also consistent within national planning policy set out in the Ministerial Statement dated 23rd March 2011 and PPS4. The Ministerial Statement seeks to promote jobs and economic growth and it is stated that the Government's clear expectation is that the answer to development and growth should wherever possible be 'yes'. This Ministerial Statement goes on to state that when deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing. PPS4 and the Ministerial Statement both state that in determining planning applications, local planning authorities are required to ensure that they give appropriate weight to the need to support economic recovery and that applications that secure sustainable growth are treated favourably. It is therefore clear that the Council should support proposals that would increase economic output, support the development of small and medium sized enterprises and increase housing supply. It is also worth noting that the Government has published a detailed consultation paper, "Relaxation of planning rules for change of use from commercial to residential". The aim of the proposals are to remove the need to make planning applications for changes of use of premises from business and possibly industrial and warehouse to residential. It is better that the Council plan for a comprehensive mixed-use scheme that includes significant economic development rather than risk the loss of such units to residential. Class D Training Centres Workspace considers that this policy should support skills and training facilities within industrial and business use areas. These facilities are important for the development of the local, regional and national economies and also important for the social generation and well-being. Such facilities are particularly important for the development and growth of small and medium sized enterprises, which form the engine of economic growth at a local level and London-wide level. It is important that training facilities are provided close to major sources of employment to create a synergy between business and education and create important links. Industrial and business use areas provide an important location in which develop training facilities.

New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amenity

27	162	Policy 35	<p>These representations object to Policy 35 'Industrial and Business Use Areas' and Policy 36 'Business Use Areas'. They also object to the glossary definition of Employment Areas, which defines them as sites protected for employment use [B1, B2 or B8] against loss to other uses. Policy 35 'Industrial and Business Use Areas', states inter alia, that the Council shall support the following uses within Industrial Use Areas, Light Industry [Use Class B1 (c)]; General Industry [Use Class B2]; Storage and distribution [Use Class B8]; or Proposals that are ancillary to industrial use. Policy 36 'Business Use Areas', states inter alia, that the Council shall support the following uses within Business Use Areas; General business [Use Class B1]; B1(a) offices up to 500 sqm are encouraged to meet local need; General industry [Use Class B2] that is considered more suitable outside of the Industrial and Business Use Areas in terms of its scale; Storage and distribution [Use Class B8]; or Ancillary uses and small-scale facilities that serve the needs of employees. It is considered that these policies and definition are contrary to the approach which is set out in the Draft Core Strategy and Strategic Objective 2 which supports the flexible approach to maintaining Strategic Industrial Locations (SILs) and other employment land to meet business needs. It is also inconsistent with the approach in Core Policy 1 'Overarching Objectives', which states, inter alia, that in accordance with the London Plan, Harrow's SILs will be protected for industrial and (wherever appropriate) related uses is also supported (Para 4.1). Further, Core Strategy Policy CS1 'Managing Growth in Harrow', states that SILs will be promoted for appropriate economic development uses in accordance with the London Plan (Part N). The London Plan Industrial Capacity SPG, adopted March 2008, recognises at para 1.9 that potential users of industrial land may include use classes other than B1 (b), B1(c), B2 and B8, such as sui generis uses. It is essential that the draft Development Management DPD is consistent with the draft Core Strategy which supports the widest range of employment uses. This approach is advocated by PPS4 (2009), EC2.1 (h) which states that Local Planning Authorities should ensure that the development plan identifies a range of sites to facilitate a broad range of economic development. Policy EC2.1 (b) of PPS4 also states that: mmk JLB0105 200611 "Policies should be flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances." Proposed Inclusion For clarity, these representations propose the inclusion of sui generis uses within Policy 35 and Policy 36 and a definition of appropriate uses on employment and industrial land within the glossary of the Core Strategy, as follows: "Appropriate development on employment and industrial land comprises all business falling within use Classes B1, B2, B8 and closely related uses not falling within a use class, sui generis uses, (such as cash and carry businesses and builders merchants) but which are commonly found in industrial estates." The sui generis uses referred to above are commonly found in industrial estates and are an established and accepted use of employment allocated land. They each generate employment, often at greater levels than B1, B2 and B8. Thus sui generis uses are an important part of the economy.</p>	<p>Object. These policies and definition are contrary to the approach which is set out in the Draft Core Strategy and Strategic Objective 2 which supports the flexible approach to maintaining Strategic Industrial Locations (SILs) and other employment land to meet business needs.</p>	<p>New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amenity</p>
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5	163	Policy 36	As above(policy 35), Policy 36 should also be amended to include reference to other employment-generating uses as appropriate uses within Business Use Areas. The MPA/S recommend that an additional bullet point be added to Policy 36 as set out above.	To include reference to other employment-generating uses as appropriate uses within Business Use Areas	New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amenity
24	164	Policy 36	Workspace supports the proposed uses within the business area, however, as with Policy 35, it is considered that this policy is to rigid to meet the needs of small and medium sized enterprises and the variety of markets in which they occupy. The policy should also consider the following matters: i.§ Small and medium enterprises - As referred to above under Policy 35, small and medium sized enterprises have an important role in leading entry into emerging sectors that by definition do not necessary fit comfortably within the traditional Class B planning use classes. It is important this policy is sufficiently flexible to encourage the economic development of small and medium sized enterprises regardless of use class. i.§ Class D training centres - As referred to above under Policy 35, it is important that training facilities are encouraged in areas in close proximity to existing employment areas as these facilities are essential for driving the economy forward by increasing the skills and expertise of existing businesses. Such facilities are also important providing employment opportunities within the local workplace.	Policy too rigid to meet needs of SMEs.	New policy added to clarify that any employment generating activity will be permitted on employment land subject to certain criteria e.g. amenity

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

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

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

10	058	8	We support the Council in their aim to ensure "that the shopping centres in the Borough retain their vitality and vibrancy within the main centres" (paragraph 8.1), and we hope that the Council will seek to improve the vitality in many of the town centres in the borough. We very strongly support paragraphs 8.7 and 8.8, and strongly agree with Policies 42, 43 44 and 46. A	None	Support noted
12	059	8	We welcome the policies in defence of retail development, and support all efforts to maintain the minimum percentages (by no means excessive), while acknowledging the recognition of permanent behavioural changes of consumers. In Local Centres, the Council should resist split development of premises as part non- retail(A3) and part retail with shop display frontage as this has proved too difficult to enforce	Resist split development of premises as part non- retail(A3) and part retail with shop display frontage as this has proved too difficult to enforce Wording change	Support noted
3	060	8.1	Paragraph 8.1 of the draft DMP DPD states that "Government guidance requires new shops and leisure facilities to be located in town centres..." It is considered that this should be supplemented by "...first, in accordance with the sequential approach outlined in PPS4."	Wording change	Revised to reflect NPPF
6	061	8.1	For clarity, the Council may wish to state in paragraph 8.1 that development management policies for retail/economic growth in Harrow Metropolitan town centre and Wealdstone District centre will be set out in detail within the Harrow and Wealdstone Area Action Plan.	Wording change	See comments above re AAP and DM policy coverage
28	175	Policy 42	Why not redesignate it all as secondary frontage? Especially if high vacancy rates.	All parades as secondary frontages	An element of primary frontage is required to secure a level of core retail use. The Retail Study does not suggest otherwise. Boundaries are changed where necessary through the Site Allocations DPD

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

6	063	8.19	<p>Officers note that the list of small shops, of a local nature, in paragraph 8.19 differ to those highlighted in paragraph 8.14. This would suggest "local centres" are defined differently to "Neighbourhood parades" in this DPD. The London Plan combines neighbourhood and local centres into one category, however, the GLA would have no objection if the Council wished to introduce greater resolution within this DPD by separating the two. The Council should, however, clarify the situation (i.e. whether "local centres" are defined differently to "Neighbourhood parades" in this DPD) so the distinction is clear when policy is being applied.</p>	<p>The Council should, however, clarify the situation (i.e. whether "local centres" are defined differently to "Neighbourhood parades" in this DPD) so the distinction is clear when policy is being applied.</p>	<p>Policy amended – local centres and neighbourhood parades to have same criteria</p>
15	179	Policy 45	<p>We note that Policy 45 makes it clear that unless otherwise indicated in the Sites Specific Allocation DPD there shall be a presumption against the loss of employment floorspace in Town Centres. Given the overlap between the Harrow and Wealdstone Area Action Plan and the Site Specific Allocation DPD, we believe that further clarification could be provided by specifically referring to the Area Action Plan in this policy, in this DPD. Additionally with regards to the blanket approach to the presumption against the loss of employment floorspace, we feel that this is wholly inflexible and does not permit the reasoned and justified reduction in employment floorspace that is currently being promoted by the Core Strategy and supported by evidence. We feel that this conflict in the reasoning should be omitted and that the Policy 45 should be updated to reflect the typical 'criteria based' assessment for the consideration of loss of employment floorspace - as promoted elsewhere in the Councils LDF.</p>	<p>IA not relevant. Policy too rigid</p>	<p>Policies in this section have been amended to reflect the flexible approach of the Core Strategy relating to employment generating uses and their suitability on employment land</p>

24	180	Policy 45	<p>Workspace considers that this policy fails to understand the economic dynamics of employment floorspace and as such, objects to this policy as it could stifle economic regeneration and growth within mixed-use schemes. Policy 45 states that there is a presumption against the loss of employment floorspace within town centres but does allow mixed-use development. It is unclear from the policy whether employment floorspace may be redeveloped with a mixed-use development or whether the existing floorspace should be converted. This policy also does not recognise that several office buildings within Harrow are no longer economically viable. The implementation of the requirements of this policy would demonstrate a lack of understanding of employment land, the use of employment floorspace and property markets. Workspace has witnessed a marked shift in the manner in which the commercial sector use their properties in recent years with an increase in job densities as companies seek to utilise space and reduce cost of operations. This has been achieved by the increase of home working, hot-desking and innovative solutions to storage. Consequently, changing work practices has resulted in many companies seeking reduced space to perform the same function as before. It is clear from Workspace's experience that existing potential employment levels can be maintained or increased on a significantly reduced level of floorspace. This policy should focus on the potential economic output within mixed-use developments and rigid in respect to floorspace expectations. The policy also states that there is an expectation that community and retail uses should be provided. The overall mix should be considered on a site-by-site basis and take account of the schemes viability and the potential regeneration benefits.</p>	<p>Objects to this policy as it could stifle economic regeneration and growth within mixed-use schemes.</p>	<p>Policies in this section have been amended to reflect the flexible approach of the Core Strategy relating to employment generating uses and their suitability on employment land</p> <p>New policy added that is supportive of mixed use development.</p>
30	181	Policy 45	<p>the Harrow and Wealdstone AAP Issues and Options consultation paper refers to the significant level of vacant office floorspace within the Intensification Area and to the fact that numerous large office occupiers have already left the area. Planning policy needs to reflect market trends and therefore a blanket protection of office floorspace will not best serve the future regeneration of Harrow town Centre. I trust you will be able to take into account our representations. We therefore recommend a revision to Policy 45 to reflect this.</p>	<p>Planning policy needs to reflect market trends and therefore a blanket protection of office floorspace will not best serve the future regeneration of Harrow town Centre</p>	<p>Policies in this section have been amended to reflect the flexible approach of the Core Strategy relating to employment generating uses and their suitability on employment land. Criteria for release of employment land to other uses is now included.</p>

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

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

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

7	187	Policy 47	<p>The RNOH Trust objects to the draft wording of this policy. The policy states that developments, including redevelopments and changes of use, should not exceed the maximum parking standards set out in the London Plan, but then contradicts this by stating that residential developments shall not exceed one space per unit. Both the current London Plan (consolidated with further alterations since 2004, adopted February 2008) and the Draft Replacement London Plan (published for consultation October 2009) allow for more than one car parking space to be provided per unit for residential developments that provide two or more bed spaces. Policy 47 should be amended so that car parking is provided in accordance with the standards set within the London Plan. Further, to allow greater flexibility for developments, the policy should allow a greater provision of car parking where exceptional circumstances can be demonstrated to justify an additional amount.</p>	<p>Object. Wording change</p>	<p>Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.</p>
11	188	Policy 47	<p>It is unreasonable not to allow some individual residential developments to have more than one parking space eg larger family houses</p>	<p>Unreasonable.</p>	<p>Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.</p>
14	189	Policy 47	<p>We support this policy, especially with reference to car-free developments and the restriction of other residential development to one space per unit. One omission, however, is any mention of the importance of providing attractive safe walking routes to the nearest public transport.</p>	<p>One omission, is any mention of the importance of providing attractive safe walking routes to the nearest public transport.</p>	<p>Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.</p> <p>Safe walking routes and public realm improvements are covered in the Design chapter.</p>

15	190	Policy 47	<p>We note that this policy advocates the maximum of one parking space per residential unit. Every development proposal is different, and there is no recognition that larger family dwellings situated in the less densely populated areas may benefit from more than one parking space per unit. A Additionally, there appears to be little reference or recognition to PTAL ratings, and the degree of accessibility to public transport, shops and services. Whilst it is appropriate for the Council to encourage lower parking provision and reduce the reliance on private car-ownership, there are instances such as providing larger family housing accommodation where the market would require more than one parking space per unit. A We note that para 52 and 53 of PPG13 makes reference to Local Authorities setting levels to reflect local circumstances, and through Transport Assessments, maintain a flexible approach to site specific and locational considerations. Therefore, we believe the parking standard should be refined to reference that on balance, residential development shall not ordinarily exceed an average of one space per unit, however this should be supported by a reasoned justification. A Finally, on a general point, we note that the concept of Development Management is a positive stance, allowing engagement with developers to bring forward and facilitate sustainable growth, rather than the regulatory approach of Development Control. We note that the Killian Pretty Review made clear recommendations to deliver a more positive and proactive approach to Development Management (rather than Development Control), and to reduce unnecessary complexity and burdens. The Development Management Polices DPD will therefore need to set the framework for a positive predisposition to encouraging sustainable growth and development, and should maintain sufficient flexibility and consideration of specific considerations. A We trust that you will find the above in order and that you will give due consideration to our comments on behalf of our joint client whilst taking forward and refining the Draft Development Management Policies into the next round of Consultations (regulation 27). We reserve the opportunity for our client to make further representations on other draft policies that may emerge, or on later consultations, and we request to be kept informed of any future publications / consultations.</p>	<p>Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.</p>
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28	191	Policy 47			Parking standards to be amended.	Parking standards to accord with the maximum standards set out in the London Plan unless exceptional circumstances demonstrate a need for more.
6	066	9.7	<p>This needs to be amended to support residents wishing to stop and park outside a local shop, pop into the shop, make their transaction and return their car. (Small transactions with the type of businesses detailed in section 8.19 - pharmacy, small supermarket and newsagent).</p> <p>Paragraph 9.7 refers to the collection of a contribution towards off site cycle parking provision. TfL would expect all cycle parking to be provided on site, unless there is clear justification for not doing so. TfL will assess proposals on a site by site basis, to ensure they would accord with the London Plan.</p>		Cycle provision to be on-site	Policy amended to require development to comply with London Plan cycle parking standards
6	192	Policy 48	<p>This policy is broadly supported, however, the Council should strengthen it to require developers to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials in line with London Plan policy 4A.28 and draft replacement London Plan policy 5.18.</p>		Policy should be strengthened to require site waste management plans	Requirement for Major development to produce management plan added
3	067	10	<p>There are numerous references within this chapter to the requirement for community uses to be located in areas which are easily accessible by sustainable modes of transport. It is considered that it would be beneficial to refer instead to areas which are, or which can be made, accessible.</p>		Wording change	This is now supported by the Core Strategy
6	068	10	<p>Supported, no specific comments.</p>		None	None
3	193	Policy 49	<p>Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.</p>			Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria

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

3	193	Policy 49	Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.	Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria
5	194	Policy 49	A Policy 49 seeks to protect existing community uses unless it can be demonstrated that there is no longer a need for that facility, where there are similar facilities near by and the facility can be relocated elsewhere within the Borough. The MPA/S support this policy.	Support noted
22	195	Policy 49	Policy 49 - Community and Education Facilities Object 1 Sport England welcomes the inclusion of Policy 49 - Community and Education Facilities. However, Policy 49 needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. This is required in order to maximise the community access of new facilities and increase their value to community users. Furthermore, Policy 49 needs to support the provision of new facilities and give guidance regarding their location in order to provide justification for the principle and location of the new facilities	Policy amended to support this and new policy added re New facilities
31	196	Policy 49	We support this policy but it is unclear what is meant by the term 'community facilities'. We see there is an entry in the Glossary for this term but it is by no means adequate. For clarity and greater certainty of intended outcomes, and so that guidelines are clear and consistent, we recommend a description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the enhancement and development of community facilities to reflect the identified deficiency of these in the Borough. In the justification of this policy at para.10.2 examples of Use Classes are listed. For consistency and clarity we suggest that sui generis buildings are also included with examples being theatres, nightclubs and laundrettes, as these are components of community facilities. If the council is particularly concerned about educational facilities then it could provide an individual policy for this issue. PPS12. In order to ensure the emerging DPD can be judged 'sound' it is thus recommended that reference is made within paragraph 10.2 to allow other community facilities, which do not fall within Use Classes D1 or D2, to be supported by Policy 49. The MPA/S therefore recommend the following amendment to paragraph 10.2	Needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. Wording change. Clarification on the definition of community facilities.

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

3	193	Policy 49	Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.	Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria
5	194	Policy 49	A Policy 49 seeks to protect existing community uses unless it can be demonstrated that there is no longer a need for that facility, where there are similar facilities near by and the facility can be relocated elsewhere within the Borough. The MPAS/S support this policy.	Support noted
22	195	Policy 49	Policy 49 - Community and Education Facilities Object Â Sport England welcomes the inclusion of Policy 49 - Community and Education Facilities. However, Policy 49 needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. This is required in order to maximise the community access of new facilities and increase their value to community users. Furthermore, Policy 49 needs to support the provision of new facilities and give guidance regarding their location in order to provide justification for the principle and location of the new facilities	Policy amended to support this and new policy added re New facilities
31	196	Policy 49	We support this policy but it is unclear what is meant by the term "community facilities". We see there is an entry in the Glossary for this term but it is by no means adequate. For clarity and greater certainty of intended outcomes, and so that guidelines are clear and consistent, we recommend a description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the enhancement and development of community facilities to reflect the identified deficiency of these in the Borough. In the justification of this policy at para.10.2 examples of Use Classes are listed. For consistency and clarity we suggest that sui generis buildings are also included with examples being theatres, nightclubs and laundrettes, as these are components of community facilities. If the council is particularly concerned about educational facilities then it could provide an individual policy for this issue.	Needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. Wording change. Clarification on the definition of community facilities.
3	070	10.3	the MPAS/S note that the above recommendation should be considered alongside our representations towards chapter 13 - glossary (set out below). Paragraph 10.3 of the consultation document notes, amongst other things, that "if the sole redevelopment of a community or education facility is not possible, the facility	These shall be in accordance with definitions within the Core Strategy
				None
				The retention of facilities is subject to

3	193	Policy 49	Draft Policy 49 relates to community and education facilities. It is considered that it should be made clear that this policy refers to such facilities in locations outside the IA. Land Securities is also of the view that applicants should either have to demonstrate compliance with the first criterion, or the last two criteria. With the third criterion, it is considered that relocation elsewhere within the Borough should only be required if demand exists elsewhere within the Borough.	Policy amended to 'or' rather than 'and' to allow for flexibility with the criteria
5	194	Policy 49	A Policy 49 seeks to protect existing community uses unless it can be demonstrated that there is no longer a need for that facility, where there are similar facilities near by and the facility can be relocated elsewhere within the Borough. The MPA/S support this policy.	Support noted
22	195	Policy 49	Policy 49 - Community and Education Facilities Object 4 Sport England welcomes the inclusion of Policy 49 - Community and Education Facilities. However, Policy 49 needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. This is required in order to maximise the community access of new facilities and increase their value to community users. Furthermore, Policy 49 needs to support the provision of new facilities and give guidance regarding their location in order to provide justification for the principle and location of the new facilities	Policy amended to support this and new policy added re New facilities
31	196	Policy 49	We support this policy but it is unclear what is meant by the term "community facilities". We see there is an entry in the Glossary for this term but it is by no means adequate. For clarity and greater certainty of intended outcomes, and so that guidelines are clear and consistent, we recommend a description for this term as: community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. In this way, arts activities and theatre will be incorporated in any policy that mentions the enhancement and development of community facilities to reflect the identified deficiency of these in the Borough. In the justification of this policy at para.10.2 examples of Use Classes are listed. For consistency and clarity we suggest that sui generis buildings are also included with examples being theatres, nightclubs and laundrettes, as these are components of community facilities. If the council is particularly concerned about educational facilities then it could provide an individual policy for this issue. should still be provided as part of any mixed-use scheme to ensure a community or education function is maintained." It is considered that this may be appropriate but only where there is evidence of need.	Needs to be extended to include a statement which supports the community use of existing and proposed dual use education facilities. Wording change. Clarification on the definition of community facilities.
				These shall be in accordance with definitions within the Core Strategy
				demand.

10	197	Policy 50	We agree with Policy 50.		Support Noted
12	198	Policy 50	Policy 50 is over concentrated on buildings, streets etc. The reference to "visual amenity" is too inadequate and weak in relation to the damaging effects on open space; see, for example, the brutal mast dominating the view from Shaftesbury Playing Fields in Green Belt in Hatch End.	None Reference to visual amenity inadequate.	Visual amenity impacts are assessed on a site by site basis.

32	199	Policy 50	<p>The MOA monitors all emerging development plan policies and supplementary planning guidance that relate to telecommunications development and those which would have an impact on their member's agreements to supply a mobile telecommunications service in the UK. Mono Consultants undertake this project on behalf of the MOA. We refer specifically to Policy 50 : Telecommunications, and whilst we encourage the inclusion of a policy facilitating telecommunications development within the LDF we consider certain criteria within the policy to be overly restrictive and thereby not within the provisions of the national guidance in PPG8. In particular the criteria relating to equipment installed within streets is ambiguous and open to interpretation, there is no reference to what sequential test the policy is referring to and no such sequential test is contained within PPG8. PPG8 and the Code of Best Practice requires that a series of options are considered to siting and design and provides advice on such matters. We would therefore consider this criteria unacceptable and request it is removed from the policy. We also do not consider that the policy requires a criteria relating to consultation with educational facilities, such practice is enshrined within the Code of Best Practice as part of the consultation process, but has no relevance to the siting and design of telecommunications development, which PPG8 confirms are the key elements to be addressed by the planning system. We therefore strongly object to the inclusion of this criteria and request that it is removed from the policy. On this basis we would suggest an alternative policy which reads; Proposals for telecommunications development will be permitted provided that the following criteria are met: - (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</p> <p>When considering applications for telecommunications developments, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.</p> <p>Justification: Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council are keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and location on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document.....</p>	Too restrictive. Criteria should be deleted. Wording change.	Agree to revision of policy to incorporate some but not necessarily all of the comments. A key objective of the policy is to safeguard visual and residential amenity from telecommunications equipment whilst considering the need for such apparatus. Policy revised to be compliant with NPPF.
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16	072	12	<p>The LDF in providing a strategy for the future development of the area has a key role in helping to co-ordinate new development with the requisite infrastructure. This includes the provision of adequate water resources together with the necessary treatment and distribution systems, and wastewater treatment capacity and disposal routes. It is essential infrastructure is put in place prior to development going ahead and that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. At present Policy 51 does not capture the essence of the need for the co-ordination of infrastructure in tandem with development. The policy also directly refers to planning obligations but does not refer to other mechanisms for the delivery of infrastructure, e.g. via planning condition. Therefore we suggest a reference to We suggest the following wording: "New development and growth will be coordinated and phased in tandem with the provision of appropriate physical and social infrastructure to ensure development results in sustainable communities and potential adverse impacts are mitigated. Proposals, which fail to make satisfactory provision for affordable housing, infrastructure and other site-specific requirements made necessary by the development shall be refused."</p> <p>As set out above, it is necessary to ensure the emerging Development Management Policies DPD reflects the strategic development plan, with regard to the definition of community facilities. The MPA/S therefore recommend that the definition be amended as follows (additional wording underlined):- <u>Community Facilities: Community facilities include educational facilities, youth centres, advice centres, policing facilities and community halls.</u></p>	<p>The Core Strategy adequately covers this requirement. The planning obligations policy has been revised to be more specific and to refer to conditions.</p>
5	073	12.1		<p>Definition change</p>
3	200	Policy 51	<p>Draft Policy 51 concerns planning obligations. Once again, it would be helpful to clarify that this policy relates to sites outside the IA boundary. It is also considered that the policy as currently drafted would benefit from amendment to remove reference to possible obligations such as affordable housing and infrastructure (as not all proposals will be for residential development, for example). It is considered that it would be more appropriate for the policy to simply read "proposals which fail to make satisfactory provision through a planning obligation for requirements made necessary by the development shall be refused." The supporting text to the policy then lists possible obligations that may be sought, although ultimately this will very much depend on site-specific circumstances and development viability considerations.</p>	<p>See previous comments re DPD coverage.</p> <p>The planning obligations policy has been revised to be more specific and to refer to conditions.</p>

4	201	Policy 51	<p>Á Policy 51 outlines that proposals which fail to make satisfactory provision through a planning obligation for affordable housing, infrastructure and other site-specific requirements made necessary by the development shall be refused. Whilst the policy requirement is acceptable in principle, developers require certainty on the planning obligations which will be sought. The text which accompanies Policy 51 sets out that the Council will prepare an SPD to give greater guidance of the types and scale of planning obligations that are likely to be sought. The SPD is urgently required to support not only policies in the emerging DDMP DPD but the emerging Core Strategy, Site Allocations and AAP DPD's. Clarity is required on the Council's priorities, costs associated with certain projects, funding mechanism, etc. In the absence of the SPD (or an indication of planning obligations that will be sought in pre-application meetings), Policy 51 has limited basis and should not be included within the DDMP DPD</p>	<p>Without SPD, policy should be omitted.</p>	<p>The planning obligations policy has been revised to be more specific and to refer to the use of conditions.</p>
6	202	Policy 51	<p>This policy is welcomed. However "transport" should be added to the policy wording. The London Plan clearly prioritises financial contributions for transport and affordable housing. In addition, developers must have regard to the Mayoral Community Infrastructure Levy (CIL) when assessing their transport infrastructure contribution, as required by draft replacement London Plan policy 8.3. The Mayoral CIL will support the delivery of Crossrail, a major strategic transport improvement. The Harrow CIL should have regard to funding local transport improvements, recognising that some transport infrastructure, for example bus network improvements, are not chargeable through a CIL, and will need to be collected through a conventional section 106 mechanism.</p>	<p>Transport should be included as an obligation.</p>	<p>The planning obligations policy has been revised to be more specific. CIL is covered in the Core Strategy and will include transport infrastructure generally.</p>

11 203 Policy 51

Should say subject to scheme viability

Council expects developers to have taken into account the cost of any onsite planning obligations that would be required of the scheme including affordable housing as part of any land deal. The Council will only consider viability on other grounds in exceptional circumstances, e.g. if it is subsequently discovered that the land is constrained in any way for instance, contamination, flood plain, archaeology, etc.

5 074 12.2

Should say subject to scheme viability. There must be more flexibility. A list of proposed items for which planning obligations will be sought is outlined in paragraph 12.2 of the supporting text to Policy 51. The MPA/S support the list of beneficiaries of planning obligations, which will seek to ensure that the impact of development upon social infrastructure is mitigated. However, the MPA/S are aware that significant additional development is likely to come forward in the borough which may increase demands on police facilities. Policy 3A.18 of the London Plan states that policies in DPDs should assess the need for social infrastructure and community facilities, including police facilities, in their area, and ensure that they are capable of being met wherever possible. Policy 3A.26 of the London Plan also highlights the importance of 'ensuring communities benefit from development including through Section 106 agreements' and improving safety and security. For this reason, it is essential that policing facilities are identified as a community facility within the emerging Development Management Policies DPD.

Policing facilities are identified as a community facility within the emerging Development Management Policies DPD

11 075 12.2

12.2 List is excessive, I suggest, at least in the current climate.

Reduce list

The list has been

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

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INTRODUCTION AND PLANNING POLICY CONTEXT 1

Development Management Policies Pre-Submission DPD

1 INTRODUCTION AND PLANNING POLICY CONTEXT

1.1 The Planning Acts require planning decisions to be made in accordance with the local planning authority's development plan, where it is relevant, unless other material considerations indicate otherwise. The National Planning Policy Framework 2012 (NPPF) reasserts the Government's commitment to a plan-led system of development management.

1.2 In Harrow the development plan currently comprises the:

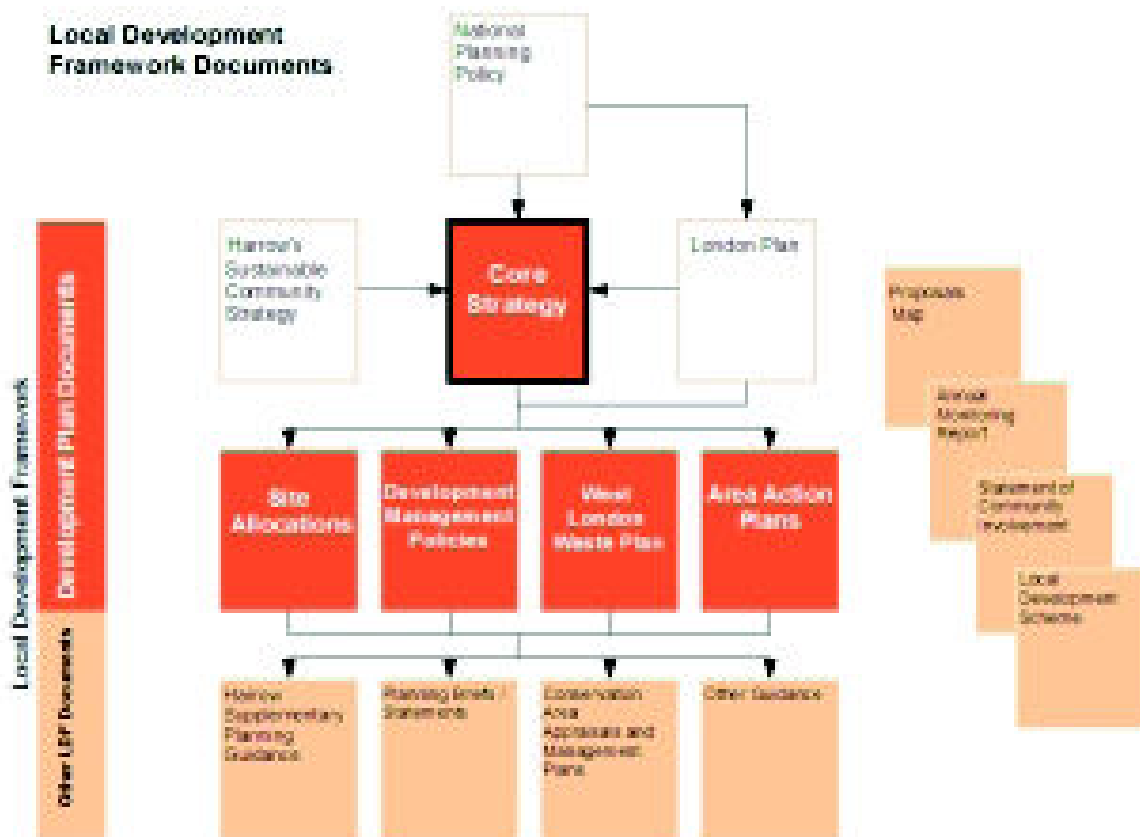
- London Plan (2011);
- Core Strategy (2012);
- Saved policies of the Harrow Unitary Development Plan (2004).

1.3 Recognising that the Unitary Development Plan is now eight years old, and following the adoption of Harrow's Core Strategy, it is now a priority for the Council to progress the preparation and adoption of development plan documents which will provide replacement policies and site allocations. These new policies and site allocations will give effect to the 15 year spatial strategy set out in Harrow's Core Strategy and are informed by Government policy set out in the NPPF. The additional development plan documents are the:

- Harrow & Wealdstone Area Action Plan
- Development Management Policies DPD
- Site Allocations DPD
- West London Waste Plan

1.4 The following diagram illustrates the collection of documents that will comprise the development plan for Harrow, and how they relate to other, non-development plan documents.

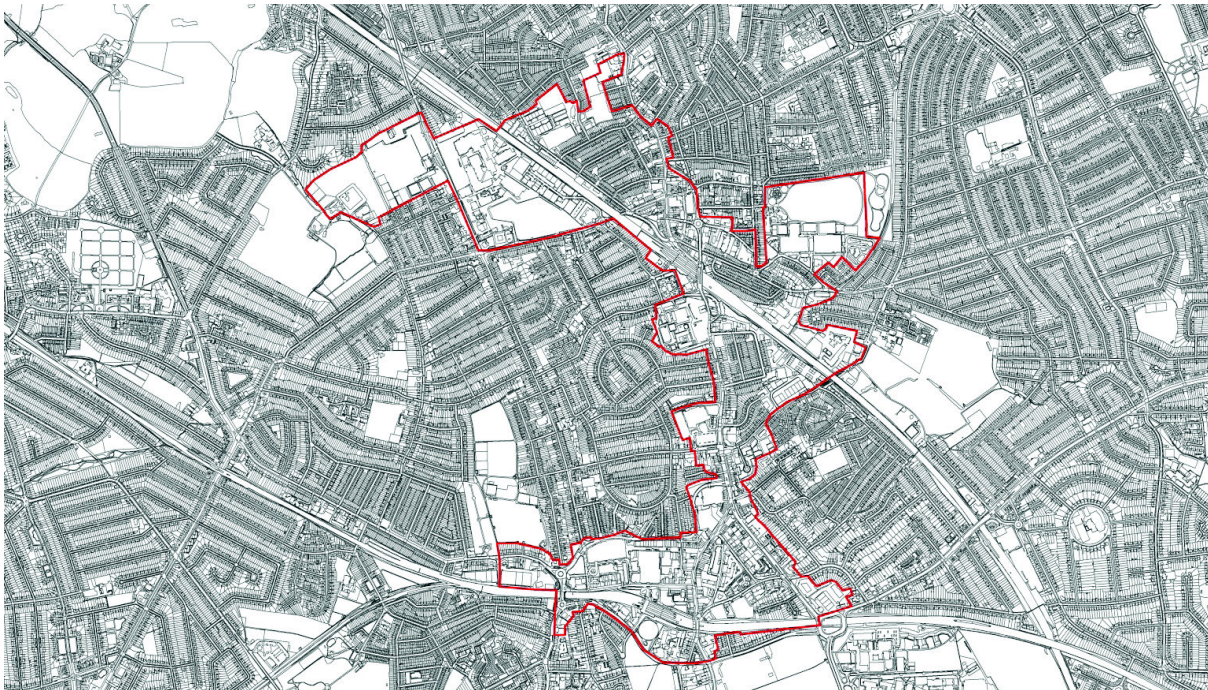
Figure 1.1 Harrow development plan documents and non development plan documents



1.5 The issues being addressed in the Development Management Policies DPD must be in general conformity with all 'higher level' plans, not repeat national and regional policy, and be consistent with the Core Strategy. The Government calls this the 'chain of conformity', which is illustrated by Figure 1.1.

1.6 The purpose of the Development Management Policies is to support the achievement of the Spatial Strategy and Core Planning Policies set in the Harrow Core Strategy. It will do this by providing detailed local policies for the management of future development in Harrow. The policies contained within this Development Management Policies DPD apply **ONLY** to land **OUTSIDE** of the Harrow and Wealdstone Intensification Area unless indicated otherwise in the Area Action Plan (see Figure 1.1 and the Harrow adopted policies map). Policies contained within the Harrow and Wealdstone Area Action Plan will **ONLY** be applicable to land **WITHIN** the Harrow and Wealdstone Intensification Area.

Picture 1.1 Harrow and Wealdstone Intensification Area Boundary



1.7 The issues covered by the Development Management Policies DPD should be specific to Harrow and should not repeat national and regional policies. Therefore, where an issue is adequately dealt with by the National Planning Policy Framework (2012) or the London Plan (2011) it will not be repeated here. However, a schedule of relevant London Plan policies is included in each chapters comprising this DPD.

1.8 The Development Management Policies DPD is being prepared by the Council under the terms of the Planning and Compulsory Purchase Act 2004. An appraisal of the sustainability of the policies in this DPD has been carried out and is available separately.

Development Management

1.9 Development Management is the part of the planning system which deals with development proposals and applications and is guided by planning policy at the national, regional and local level and by any other relevant guidance. It is a positive and proactive approach to shaping, considering, determining and delivering development proposals. It will support the delivery of the vision for Harrow set in the Core Strategy and in all other documents contained within the LDF.

1.10 The aim of Development Management is to simplify the planning process for all parties involved. It should result in increased transparency of decision-making, with interested parties engaged at the earliest opportunity of the planning process so that the wider community benefits that any development can achieve are appreciated from the outset. The emphasis is on collaboration, as opposed to negotiation, and to arrive at a balanced agreement between all parties instead of a compromise so that it meets all party objectives. In this spirit, the policies in this DPD have been positively prepared to set out the circumstances in which the Council will support development proposals.

Stages in the Plan's Preparation

1.11 In accordance with the Town and Country Planning (Local Plans) (England) Regulations 2012, the preparation of the Development Management Policies DPD will undergo three key stages before its adoption. The publication of this document represents the second of the following three stages:

- Public participation in the preparation of the Development Management Policies DPD;
- Publication of the Development Management Policies DPD; and
- Submission of the Development Management Policies DPD and information to the Secretary of State for independent Examination in Public.

1.12 The Council consulted on a 'preferred option' draft of the Development Management Policies DPD during May and June 2011. The consultation exercise included a series of roadshows, presentations to groups that comprise the Harrow Strategic Partnerships, as well as meetings with residents' groups and partner organisations.

1.13 This 'pre-submission' draft of the Development Management Policies DPD represents the version of the document that the Council intends to submit to the Secretary of State for examination. Its preparation has been informed by the responses received during the 2011 'preferred option' consultation and by subsequent changes to the policy landscape within which the document will operate. These include the adoption of the replacement London Plan, the adoption of the Harrow Core Strategy, and the publication of the NPPF. At this 'pre-submission' stage participants are asked to focus their responses to the DPD to the questions of legal compliance and soundness, these being the matters upon which the DPD will be examined. Explanation of the meanings of legal compliance and soundness are provided with the consultation documentation.

1.14 Following this 'pre-submission' consultation, and subject to the Council's consideration of any matters arising from that consultation, it is intended to submit the DPD to the Secretary of State in September 2012.

Connection to the Core Strategy

1.15 The policies in this Development Management Policies DPD play an important role in the delivery of the overall vision and objectives for the Borough as set in the Core Strategy. The policies provide additional detail and guidance on how the Council will implement the Spatial Strategy and core policies contained in the Core Strategy through the decision-making on all planning applications **OUTSIDE** of the Harrow and Wealdstone Intensification Area (unless specified in the Area Action Plan). For this reason, the two documents - the Core Strategy and Development Management Policies DPDs - should be read in conjunction with one another. Policies at national and regional level will also be applicable, whether it is at the pre-application or planning application stage of the process.

Sustainable Development and Sustainable Communities

1.16 Sustainable development is the core principle underpinning planning. At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations. This means meeting the diverse and changing needs of all people in existing and future communities, promoting personal wellbeing and inclusion; creating equal

Development Management Policies Pre-Submission DPD

opportunity for all and creating stability for effective community development and cohesion. Harrow's Sustainable Community Strategy (2009) identifies core objectives through its vision to achieve this.

1.17 The Development Management Policies DPD is being produced with full regard to these principles, and will continue to be subject to a sustainability appraisal at each stage of its development. Underpinning the preparation of the Core Strategy and this Development Management Policies DPD is an approach that seeks to ensure that, as far as possible, policies and proposals contribute towards relevant environmental, social and economic objectives.

1.18 A holistic approach to sustainability requires the development of sustainable communities. Sustainable communities are places where people want, and are enabled to, live and work, now and in the future. They are sufficiently flexible and adaptable to meet the diverse needs of existing and future residents; are sensitive to their environment; and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.

PLANNING POLICY CONTEXT

National Planning Context

1.19 Planning for the Borough must consider the Government's overall approach to planning and sustainable development. The Government's Sustainable Development Strategy 'Securing the Future' 2005 identifies five guiding principles to achieve sustainability:

- Living within environmental limits;
- Ensuring a strong healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly.

1.20 For a policy to be sustainable, it must respect all five principles, though some policies, while underpinned by all five, will place more emphasis on certain principles than others. Any trade-offs should be made in an explicit and transparent way. In Harrow, building sustainable communities requires developing the Borough as a place, which enables people to live healthy, sustainable lives. All planning policies within Harrow's development plan documents contribute towards the aim of achieving balanced and sustainable communities.

1.21 Following consultation in 2011 the Government has published a National Planning Policy Framework (NPPF) which replaces the plethora of previous planning policy statements and planning policy guidance notes. The NPPF establishes a presumption in favour of sustainable development and requires development plans to be consistent with that presumption. In particular, this means that plan making authorities must:

- positively seek opportunities to meet the development needs of the area; and
- meet objectively assessed needs with sufficient flexibility to adapt to rapid change.

1.22 In Harrow, the development needs of the Borough have been objectively assessed through the preparation of Harrow's Core Strategy. The spatial strategy for the Borough provides for these needs to be met on previously-developed land and for the delivery of infrastructure necessary to support projected levels of growth. The Site Allocations DPD and Area Action Plan will give effect to the spatial strategy by ensuring a supply of previously developed land to deliver development over the plan period. The Development Management Policies DPD will give effect to the spatial strategy by giving support to appropriate forms of development and includes a policy on Planning Obligations to ensure that any site specific infrastructure requirements, and affordable housing, are delivered through the planning process. The Council is also preparing a local Community Infrastructure Levy to ensure that development continues to contribute to the cost of delivering the infrastructure made necessary by growth in the Borough.

Regional Planning Context

1.23 At the regional level, Section 24 of the Planning and Compulsory Purchase Act 2004 requires local development plan documents to be in general conformity with the spatial development strategy for London (the London Plan). The current London Plan was adopted by the Mayor of London in July 2011, and replaces the original London Plan adopted in 2004. Its objectives seek to ensure that London is:

- A city that meets the challenges of economic and population growth;
- An internationally competitive and successful city;
- A city of diverse, strong, secure and accessible neighbourhoods;
- A city that delights the senses;
- A city that becomes a world leader in improving the environment; and
- A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

Local Planning Context

1.24 At the local level, the Core Strategy sets out the spatial vision and objectives of the Harrow LDF. The policies within this Development Management Policies DPD seek to give effect to the spatial vision and objectives of the Core Strategy, which will be used for Development Management purposes.

1.25 The Council's spatial vision and aspirations for the Borough is also reflected in Harrow's Sustainable Community Strategy 2009, which identifies six key themes:

- Economic Development in Harrow;
- An Improving Environment;
- Every Harrow Child;
- Culture, Communities and Identity;
- Health, Wellbeing and Independence; and
- The Future of Public Services and Democracy.

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1.26 Taking into account the Core Strategy, the collective suite of documents contained within the development plan documents will aim to deliver the vision for the Borough to 2026.

Consultation

1.27 The consultation period for this Development Management Policies DPD will be from **X 2011 to X 2011**.

1.28 You can comment on the document in the following ways:

- Online at www.harrow.gov.uk
- Email at ldf@harrow.gov.uk or
- By post to: Planning Policy, Harrow Council, Room 300, 3rd Floor East Wing, Civic Centre, FREEPOST RLZL-GGTG-YBTG Harrow, HA1 2UY

Please note, if you send a response by email, it is not necessary to send a hard copy. All representations will be made available for public inspection.

1.29 At this stage of the Development Management Policies DPD's preparation the consultation is concerned with the legal compliance and soundness⁽¹⁾ of the document. Guidance on how you can make your comments and the information required will be provided as part of the consultation exercise. Copies of all responses received during pre-submission consultation will be forwarded to the Planning Inspectorate for consideration alongside the submission Development Management Policies DPD, together with a summary of key issues setting out the Council's response to points raised. In contrast to previous stages of consultation, the Council will not be making any further substantial changes to the DPD prior to its submission. However, a schedule of minor post-publication changes will be prepared and submitted to the Planning Inspectorate. A Planning Inspector will then make an independent assessment of the DPD at an Examination in Public (anticipated in December 2012). If the Inspector determines that Harrow's Core Strategy is sound, he or she will publish a report containing a number of recommendations that the Council must consider in its decision to adopt the document as part of the development plan for Harrow.

1 That it is that the plan has been positively prepared, is justified, effective and consistent with national policy

CHARACTER AND AMENITY 2

Development Management Policies Pre-Submission DPD

2 CHARACTER AND AMENITY

INTRODUCTION

2.1 Harrow is a classic outer London borough. Having formed part of the Middlesex landscape of villages, farms and country estates for many centuries, the extension of railway lines out of London in the 19th and early 20th Centuries generated rapid suburbanisation which in turn required new shopping districts, factories and public open spaces. The resulting legacy is a network of surviving village and inter-war town centres, enveloped by residential suburbs, and local parks, schools, offices and business premises. The Borough's residential suburbs provide a generally quiet, leafy environment and traditional forms of accommodation, particularly attractive for families, and together with the network of town centres, public transport, social and economic infrastructure, provide a good foundation for more sustainable living.

2.2 The Character Assessment of Harrow's Residential Areas (2010) reveals a surprisingly rich diversity in the type and form of the Borough's suburbs. It also identifies the principal characteristics of the Borough's town centres, and documents the Borough's hydrology, topography and designated heritage assets. As the Borough continues to change and evolve, in response to the growth needs set out in Harrow's Core Strategy, the importance of making more efficient use of land through redevelopment of previously-developed land will not diminish. The policies set out in this chapter are intended to deliver development which both recognises and safeguards the positive attributes of character and amenity afforded by Harrow's existing built environment, and which enables opportunities for development to strengthen Harrow's capacity to be a sustainable 21st Century outer London suburb to be fully exploited. Policies relating to the built heritage of the Borough are set out at Chapter 3 of this DPD.

2.3 The Council will seek a high standard of design and layout for new development appropriate to the site's context, the area's defining characteristics and local distinctiveness. Whilst it will often be most appropriate for small scale proposals and extensions to reflect the existing built form, intelligent interpretation of context, character and distinctiveness should deliver the best development for the site which need not equate to rigid replication of established styles. A contemporary form of architecture may be the appropriate response to the site's location, for example to create an identity or a landmark feature, but may not be suitable in areas of distinct, coherent character. The policies in this chapter seek to achieve a high standard of design and layout which preserves and appropriately enhances the quality of those parts of the Borough's built environment outside of the Harrow & Wealdstone Intensification Area⁽²⁾.

2.4 Harrow's Green Belt, Metropolitan Open Land and local open spaces are an important part of the Borough's character and contribute to amenity by providing visual relief, opportunities for formal sport and recreation, and quiet activities such as walking and the appreciation of local natural environments. Design and layout should be relevant to the location, with a presumption in favour of previously developed land and against any net loss of open space. This ensures continued protection is given to Green Belt, Metropolitan Open Land and other open spaces and which are highly valued assets of increasing importance within a highly populated, built-up urban environment. PPS 3 *Housing* (2011) sets out the matters to be considered when assessing housing design quality and its definition of previously-developed land specifically excludes residential gardens. The policies in this chapter seek to enable effective use to be made of previously-developed land

2 Policies to deliver a new, high quality and sustainable urban form within the Intensification Area will be contained within the Harrow & Wealdstone Area Action Plan.

and to provide an appropriate level of protection for Harrow's residential gardens. Policies relating to the open and natural environment of the Borough are set out at Chapter 5 including requirements for new provision of sport and recreation facilities.

2.5 PPS1: *Delivering Sustainable Development* (2005) states that planning authorities should plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. *Secured by Design* is an initiative by the Police that focuses on crime prevention at the design, layout and construction stages of development. Policies in this chapter seek to deliver development that integrates with the neighbourhood of which it will form a part, and which enhances the experience of the neighbourhood for everyone in the community. They also provide the framework for the consideration of appropriate building height outside of the Intensification Area, including impacts upon locally important views and landmarks.

2.6 The control of advertisements is exercised in the interests of amenity and public safety⁽³⁾ and include matters such as the general character of the area, highway safety and the potential for hindrance to the operation of CCTV. In deciding whether or not to grant advertisement consent, the provisions of the development plan and any other relevant factors may be taken into account. Policies in this chapter set out the main criteria for the consideration of proposals for shop signs and freestanding advertisements, and other policies in this document will be taken into consideration where they are relevant (such as those relating to open space and heritage).

DESIGN, LAYOUT, PRIVACY AND AMENITY

Policy 1

Achieving a High Standard of Development

Design and Layout Considerations

- A. All development and change of use proposals must achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.
- B. The assessment of the design and layout of proposals will have regard to:
 - a. the massing, bulk, scale and height of proposed buildings in relation to the location, the surroundings and any impact on neighbouring occupiers;
 - b. the appearance of proposed buildings, including but not limited to architectural inspiration, detailing, roof form, materials and colour, entrances, windows and external services;
 - c. the context provided by neighbouring buildings and the local character and pattern of development;
 - d. the provision of appropriate space around buildings for setting and landscaping, as a resource for occupiers and to secure privacy and amenity;
 - e. the need to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit;

³ Regulation 3 of the Town and Country Planning (Control of Advertisements) England Regulations 2007

- f. the functionality of the development including but not limited to internal circulation, parking, servicing and arrangements for waste, recycling and composting; and
- g. the arrangements for safe, sustainable and inclusive access and movement to and within the site.

Privacy and Amenity Considerations

- C. All development and change of use proposals must achieve a high standard of privacy and amenity. Proposals that would be detrimental to the privacy and amenity of neighbouring occupiers, or that would fail to achieve satisfactory privacy and amenity for future occupiers of development, will be resisted.
- D. The assessment of privacy and amenity considerations will have regard to:
 - a. the prevailing character of privacy and amenity in the area and the need to make effective use of land;
 - b. the overlooking relationship between windows and outdoor spaces;
 - c. the relationship between buildings and site boundaries;
 - d. the visual impact of development when viewed from within buildings and outdoor spaces;
 - e. the adequacy of light and outlook within buildings and outdoor spaces;
 - f. the adequacy of the internal layout of buildings in relation to the needs of future occupiers and any impact on neighbouring occupiers; and
 - g. the impact of proposed use and activity upon noise, including hours of operation, vibration, dust, air quality and light pollution.
 - h. the need to provide a satisfactory quantum and form of amenity space for future occupiers of residential development.

Other Planning Considerations

- E. Development which would prejudice the future development of other parts of the site, adjoining land, or which would frustrate the delivery of adopted plans and allocated sites, will be resisted.

Reasoned Justification

2.7 As much of Harrow's built environment approaches its centenary, it continues to offer a high quality of life for residents and a good place for local business and learning. The Borough's classic 'Metroland' pattern of suburbs and centres also places Harrow in a strong position to achieve more accessible, sustainable lifetime neighbourhoods. New development and changes of use proposals offer the potential to strengthen the valuable components of the Borough's existing built environment whilst realising the opportunity of previously-developed to meet future housing and economic needs without loss of open space. To this end, the Council will seek to achieve a high standard of development in terms of design, layout, privacy and amenity. Planning applications which fail to achieve a high standard, or which are detrimental to privacy, amenity, character and appearance, will be refused.

2.8 Detailed guidance in relation to residential proposals, conversions of houses to flats and householder development has been produced in the Council's Residential Design Guide SPD. The guide supplements the considerations set out in this policy and will be a material consideration in the determination of planning applications for relevant proposals.

Design and Layout Considerations

2.9 The massing of a building is its three-dimensional form and the bulk of a building concerns its size or volume. The design of a building can have the effect of reducing perceptions of bulk, by breaking up its mass, or could be used to emphasise the building's dominance if that is appropriate. Consideration of scale concerns the ratio of building size; usually how a proposed building relates to existing development or how proposed new buildings relate to each other. Height concerns the building's upward extent above ground level on the site and in relation to surrounding levels, and in relation to vistas, views and the wider landscape or townscape.

2.10 The massing, bulk, scale and height of buildings are significant components of an area's character and help to convey the distinction between urban, suburban and semi-rural parts of the Borough. Consideration of these components should therefore be informed by location: whether the site is in a town centre; industrial estate; a residential area; or is in the Green Belt. However the surroundings of the site will also be important in the consideration of these components: whether the massing, bulk, scale and height of buildings are part of the area's sense of place; whether the site forms an interface between one type of location and another; and how the building relates to existing buildings, including any impacts on neighbouring occupiers.

2.11 The appearance of a building is the popular meaning of 'design' and can strengthen or detract from an area's sense of place. The best designed buildings are often inspired by a recognised architectural idiom which will then inform the appropriate form and level of architectural detail. However this need not mean rigid replication of existing architectural styles; modern interpretations based on a demonstrable appreciation of design can introduce exciting new forms and, where appropriate, add variety and interest. Roof form is an important visual element of a building and will help to convey the overall architectural message.

2.12 Quality of execution is key to the realisation of design success, and in this regard the Council will exercise control of materials, colour, entrance and window details. Amendments that diminish the design quality of an approved scheme will not be accepted. External services and telecommunications equipment can significantly detract from a building's finished appearance, particularly in multi-occupancy developments, and should therefore be discretely accommodated as part of the design process at the outset.

2.13 The Harrow Character Assessment of Residential Areas (2010) highlights the rich diversity of the Borough's residential environments and documents some of their key attributes. The Borough's town centres fall into two broad types: former village settlements and inter-war Metroland parades. Many areas have well established and cherished characteristics which may derive from a range of attributes such as spaciousness or enclosure, profile and proportions, uniformity or variety, composition of materials, roof form, streetside and garden greenery, uses and levels of activity. Pattern of development often combines with these attributes to re-enforce local character and may require an assessment of the arrangement of buildings and spaces beyond the site and its immediate neighbours. The design and layout of new development should demonstrate recognition of the context provided by the character and pattern of development in the area and respond positively to it.

2.14 The provision of appropriate space around buildings will frequently be informed by the character and pattern of development in the area, which will in turn be relevant to the appropriate gaps and distances needed to safeguard the privacy and amenity of neighbouring occupiers. Space around buildings is important not only as a setting for the building in its context, but also for reasons of functionality. It enables the implementation and successful growth of landscaping

schemes, provides an outdoor amenity for occupiers and space for refuse storage, car parking etc. It may also be an important element of a site's plan for the sustainable management of flood risk and surface water drainage. However 'left over' spaces which are neither functional nor visually beneficial constitute nothing more than a maintenance liability, and should be avoided.

2.15 Existing trees and landscaping can be a valuable resource and, where it is desirable to retain them (including any statutorily protected trees), the design and layout of new development must allow for this including details of measures to protect retained trees and landscaping during construction. Detailed schemes of landscaping should be submitted with the planning application or may be required as a condition of planning permission where appropriate. Proposals which fail to make satisfactory arrangements for landscaping or the tree protection of retained trees will be refused. The Council will take enforcement action and where appropriate prosecute those who deliberately damage or remove protected trees. Similarly the Council will require the retention of biodiversity and other natural features of merit, and will protect these from any adverse impacts of proposed development. The opportunity provided by new development to enhance the presence of trees, landscaping, biodiversity and other natural features in areas where these are lacking will be fully exploited.

2.16 The design and layout of development should permit a high level of permeability by sustainable modes and be fit for purpose. Access to the site should be safe paying particular attention to highway conditions and the needs of pedestrians and cyclists. Parking for bicycles and (where provided) cars should be conveniently located but should not prejudice the proper layout of buildings and landscaping, nor dominate the appearance of the development. Provision of parking must also be safe and secure for users. Similarly other aspects of the site's functionality, such as the internal space within buildings and the arrangements for servicing and waste, should provide sufficient capacity to meet expected requirements as well as securing convenient use for occupiers and efficient logistics for operators. The siting of waste, recycling and composting should avoid potential nuisance to occupiers and minimise visual impact.

2.17 The prevailing building height in Harrow's residential areas is two storey, whilst the Borough's district and local centres have prevailing heights of two and three storey. The criteria set out in Policy 1 for achieving a high standard of development, including the need to make effective use of previously developed land, will inform the appropriate height of development proposals in residential areas, town centres and other sites beyond the Harrow & Wealdstone Intensification Area. Tall buildings are defined in the London Plan as those that are substantially taller than their surroundings, cause a significant change to the skyline, or are larger than the threshold sizes for the referral of planning applications to the Mayor⁽⁴⁾. The Core Strategy recognises that tall buildings in the Harrow & Wealdstone Intensification Area may be appropriate and will be managed through the Area Action Plan for Harrow and Wealdstone, any proposals for tall buildings outside this area will be assessed according to London Plan criteria.

2.18 In accordance with the Safeguarding Aerodromes Direction (2002), most of the southern part of the Borough falls within one of two height restriction zones for Heathrow Airport, which would require notification to British Airports Authority (BAA) of any proposal in excess of either 45m or 90m, as illustrated on the BAA Aerodrome Safeguarding Map. In the event of any proposal that qualifies for referral to BAA under the current or any revised Direction, the applicant will be

4 A building that would be more than 30m high, or any proposal that would increase the height of a building by more than 15m and resulting in an overall height exceeding 30m; Part 1 of the Schedule to the Town and Country Planning (Mayor of London) Order 2008.

required to demonstrate that the development would not penetrate the protected surface of the safeguarding zone, would safeguard against interference with visual and electronic navigational aids, and would not increase the bird hazard risk to aircraft. Particular design and layout considerations will include the height of construction equipment, the height of the completed development and any associated landscaping, the potential impact of telecommunications equipment and external lighting, and the potential of the proposed development or uses to increase the bird hazard risk to the safe movement of aircraft.

Privacy and Amenity Considerations

2.19 The standard of privacy and amenity achieved by development will be closely related to the application of design and layout considerations set out above. Development must create successful, usable space for future occupiers but this should not be at the expense of other planning considerations, including the living conditions of neighbouring occupiers or (for mixed use development) the viability of business premises.

2.20 Expectations about privacy and amenity will be informed in part by location and associated forms of development: the relationship between buildings, uses and levels of activity will differ substantially between a busy town centre and an outlying residential suburb on the edge of open space. For development in close proximity to the boundary of a neighbouring residential property, with potential for very direct privacy and amenity impacts, the Council will apply basic design and layout requirements irrespective of location. Assessment of less immediate impacts between new development and neighbouring property, and of the reasonable privacy and amenity expectations of future occupiers of the development, will be informed by the characteristic relationships in the area, the need to make effective use of land and any relevant London-wide standards.

2.21 In relation to privacy impacts, particular attention will be paid to the distance between habitable room and kitchen windows, and to the suitability and effectiveness of mitigation measures having regard to the degree of overlooking and the potential for harmful perceptions of overlooking to remain. The Council's 45 Degree Code, which is applied to determine the appropriate siting and projection of buildings in relation to the corner/edge of another building, will continue to be used in conjunction other considerations⁽⁵⁾ to maintain satisfactory amenity and visual relationships between buildings and spaces.

2.22 Sunlight, daylight and outlook are highly valued components of residential quality, but should not be ignored when designing other buildings where they may add to the sustainability and attractiveness of the development. The proximity, orientation and size of one building can impact upon the light, outlook and visual environment of another building. Particular attention will be paid to the light and outlook of habitable rooms, and to kitchens⁽⁶⁾. The 45 Degree Code will be applied in conjunction with other considerations to achieve satisfactory sunlight, daylight and outlook.

2.23 Outdoor spaces provide a valuable amenity for occupiers and should have a configuration and relationship with buildings which secure a high level of functionality and environmental quality. Consideration will be given to the visual impact of development upon outdoor spaces and the potential for buildings to cause excessive overshadowing. Again, the Council's 45 Degree Code and other considerations will be used to achieve satisfactory relationships in this regard.

5 Such as building height, site levels and orientation.

6 Where the kitchen has an area of at least 13 square metres.

2.24 Privacy and amenity considerations do not stop at the external relationship of buildings and spaces. Noise transfer between dwellings can be as critical to privacy as overlooking, whilst lack of provision for domestic storage space can lead to the use of features which are meant to provide amenity, such as balconies and garages, for this purposes. Whilst the quality of sound insulation is a matter for Building Regulations, the internal layout of rooms can help to mitigate transfer of unwanted noise between homes. The provision of built-in storage facilities are sought-after features of new homes and help to maintain the value of other amenities. Wherever possible new homes should have a dual aspect to provide occupiers with opportunities to enjoy sunlight and cross-ventilation.

Other Planning Considerations

2.25 Proposals should not prejudice the proper planning of the Borough, the area or the site in which they are located. Partial development of sites which would benefit from planning and development on a more comprehensive basis, including that which requires the involvement of other parties, will be resisted. Proposals which would frustrate the delivery of approved development, or be at odds with adopted proposal sites and site allocations, will similarly be resisted where there are demonstrable planning reasons, in the public interest, to do so.

LIFETIME NEIGHBOURHOODS

Policy 2

Achieving Lifetime Neighbourhoods

- A. The location, design and layout of development, and any associated improvements to the public realm, transport and other infrastructure, will be required to contribute to the creation of lifetime neighbourhoods. In particular:
 - a. non-residential development and change of use proposals must be appropriately located to sustain town centres, neighbourhood parades and local employment opportunities;
 - b. non-residential development and change of use proposals must be accessible to all;
 - c. new residential development and conversion proposals must provide accessible homes in accordance with policy CS1 of the Core Strategy;
 - d. all proposals must be safe and secure for everyone.
- B. Major proposals will be expected to demonstrate how they contribute to the creation of lifetime neighbourhoods within and beyond the site boundary.
- C. Improvements to the public realm must achieve an inclusive, legible pedestrian and cycling environment. Where opportunities exist, pedestrian and cycle routes between suburban areas, town centres, neighbourhood parades, public transport and green infrastructure should be strengthened. Proposals which impede pedestrian and cyclist permeability will be resisted.
- D. New and replacement bus stops must be of accessible design. All proposals must make appropriate provision for car parking for disabled people.
- E. Major development within town centres and proposals for public buildings, visitor attractions and tourist accommodation, and Green Grid projects, should make appropriate provision

for the comfort and convenience of all users, including those with special mobility requirements.

- F. Sensitive adaptations of heritage assets which contribute to the creation of lifetime neighbourhoods will be supported.

Reasoned Justification

2.26 The concept of the lifetime neighbourhood is a natural extension of the lifetime home principle; that is, one which is accessible and comfortable for everyone regardless of age, health and physical ability. Lifetime neighbourhoods are created when accessible housing and non-residential development are integrated with an urban environment and open space which enables everyone to participate in the economic, civic and social life of the community. Without inclusive urban and green infrastructure, the development of accessible buildings is meaningless.

2.27 A high quality, inclusive and accessible environment benefits the quality of life for visitors and residents alike. It allows everyone to move around more easily and enables residents at all stages of the life cycle to remain in situ as part of the local community, including families with small children, older people and those with mobility impairment. Properly implemented, lifetime neighbourhoods will also reap economic and environmental rewards as they enable people to remain independent and economically active for longer, and as they reduce the need for extensive adaptations to buildings to meet the needs of existing and potential future users.

2.28 The legacy of Harrow's Metroland development, comprising suburban residential areas with town centres, neighbourhood parades, open spaces and employment areas, lends itself well to the realisation of lifetime neighbourhood principles. Proposals should reinforce this legacy, and contribute to the Harrow's spatial strategy, through consideration of location, design and layout. Amenities, shops and other community facilities which serve the wider area should be located in town centres whilst more localised, walk-to activities will be appropriate within neighbourhood parades. Local businesses are a substantial component of Harrow's economy and represent an important source of employment in the Borough. Business development in town centres and employment areas, as appropriate, will therefore also be critical to the success of lifetime neighbourhoods.

2.29 The Council's Access for All SPD (2006) provides detailed guidance for inclusive and accessible design. Harrow's Core Strategy requires all new homes to meet the Lifetime Homes Standard and for at least ten per cent to achieve the enhanced requirements of the Wheelchair Homes Standard. Detailed guidance on the application of these standards in Harrow is provided in the Council's Accessible Homes SPD (2010). The Council will revise and update these supplementary planning documents as necessary in forthcoming years. If lifetime neighbourhoods are to be successfully achieved it will not be enough simply to apply accessibility standards to new development. Whilst often more challenging, the Council will apply the accessibility standards to secure adaptations to existing buildings through change of use proposals, including the conversion of houses to flats, as a matter of principle and as a component of housing choice. Proposals for new shopfronts and other relevant alterations to non-residential buildings will be required to secure accessibility improvements. The accessibility standards are not a requirement for domestic development, but where substantial extensions are proposed householders may wish to take the opportunity to make their homes more accessible.

2.30 Safe, secure neighbourhoods enable everyone to participate in the social and economic life of that community. The design and layout of all proposals should help to create a safe and secure environment for everyone in the community, not just for the occupiers of the development. The design and layout of development should therefore be informed by the Secured by Design⁽⁷⁾ principles with a view to exploiting all appropriate opportunities to improve the safety and security, and perceptions of safety and security. Activity, natural surveillance, landscaping, appropriate lighting and clear demarcation of (and responsibility for) public and private realm will be preferable to obtrusive physical barriers which create fortress-like conditions for occupiers and visitors alike, and will usually be out of character with Harrow's existing built environment. Gated development is counter to lifetime neighbourhood principles and will be resisted.

2.31 Section 17 of the Crime and Disorder Act (1998) places a duty on local authorities and some other public bodies to exercise their functions with a view to preventing crime and disorder. In addition to the above crime and security considerations the Council will, where relevant to a proposal, have regard to the Government's advice on the management of crowded places⁽⁸⁾.

2.32 The design and layout of all development should achieve full integration into the area within which the site is located. However major development proposals⁽⁹⁾ provide an opportunity to extend lifetime neighbourhood principles beyond the site boundary to achieve, for example, enhancements to the pedestrian environment and cycle routes between the site and local destinations, or the implementation of appropriate Green Grid projects. Applicants will be expected to demonstrate how their scheme contributes to the creation of a lifetime neighbourhood within and beyond the site boundary.

2.33 Proposals that create new public realm, or which seek the modification of existing public realm, provide further opportunities to create an inclusive environment which encourages pedestrian and cycle movement. Priority will be given to natural desire lines within the area such as pedestrian flows within town centres, local public transport and open destinations, and routes to school. Careful design and layout should be used to mitigate potential conflict between pedestrians, cyclists and vehicular traffic without the use of bollards, railings and other 'hard' measures. Opportunities to reduce or rationalise street clutter should be fully exploited. Proposals which are detrimental to the pedestrian and cyclist permeability of an area, and therefore contrary to lifetime neighbourhood principles, will be resisted.

2.34 Inclusive access to public transport is a key component of creating lifetime neighbourhoods and benefits everyone. To this end, new and replacement bus stops being provided as a result of development will be required to fully accessible. Through Harrow's Transport Local implementation Plan the Council will ask Transport for London to achieve this standard when replacing existing bus stops in the Borough, and will continue to lobby for investment to upgrade local Underground stations to be fully accessible to people with mobility impairment. In accordance with the London Plan, relevant proposals must make satisfactory parking provision for disabled people even if the development would otherwise be 'car free'.

7 <http://www.securedbydesign.com>

8 Crowded Places: The Planning System and Counter-Terrorism (2010); and Protecting Crowded Places: Design and Technical Issues (2010).

9 Major development is that which proposes the development of 9 or more homes, or over 1,000 square metres' non-residential floorspace.

2.35 Town centres and other development which is open to the public and visitors should be welcoming and inviting to everyone. The availability of basic amenities such as rain canopies over shopfronts, seating areas and publicly accessible toilets benefit everyone, but will make a real difference to the usability of the place for people with mobility or other health impairments. Provision of appropriate facilities will therefore be sought in proposals for major development in the town centre, public buildings and new visitor attractions. In accordance with the London Plan, at least 10% of bedrooms in new hotel developments should be wheelchair accessible.

2.36 Inclusive access to historic buildings and environments will be an integral part of the creation lifetime neighbourhoods, enabling residents and visitors to appreciate the Borough's rich heritage irrespective of personal mobility. Particularly careful attention to design and layout details will be required to achieve adaptations which are sensitive to the special qualities and setting of the asset. The Council will support such adaptations. However the Town and Country Planning (Listed Buildings and Conservation Areas) Act (1990) places a duty on local planning authorities to pay particular attention to the preservation of listed buildings' special architectural or historic interest⁽¹⁰⁾, and to the preservation or enhancement of conservation areas' character or appearance⁽¹¹⁾. Poorly thought out, inappropriate access solutions which are at odds with these statutory provisions will therefore be resisted.

PROTECTED VIEWS AND VISTAS

Policy 3

Protected Views and Vistas

- A. The protected views identified on the proposals map will be safeguarded in accordance with the Harrow Views Assessment (2012) and the London Views Management Framework. Where there is a protected view:
 - a. development should not exceed the threshold height of a landmark viewing corridor;
 - b. development in the wider setting consultation area should form an attractive element in its own right and preserve or enhance the viewers' ability to recognise and to appreciate the landmark;
 - c. development in the foreground of the wider setting consultation area should not detract from the prominence of the landmark.
- B. Development should not harm and, where possible, should make a positive contribution to the characteristics and composition of the protected views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate important landmarks, in particular St. Mary's Church and Harrow on the Hill and the Harrow Weald Ridge as seen from designated viewing places.
- C. Development in the foreground and middle ground of a protected view should not be overly intrusive, unsightly or prominent to the detriment of the view.

10 See section 16(2) of the Act

11 See section 72(2) of the Act

- D. Development proposals in the background of a view should give context to landmarks and not harm the composition of the view as a whole.
- E. Viewing places should be accessible and managed so that they enhance people's experience of the view.
- F. Opportunities to create new local landmarks and viewpoints, and to open up local views and vistas, should be exploited through the design and layout of new development.

Reasoned Justification

2.37 The landscape backdrop provided by the Green Belt, to the north of the Borough, and the profile of Harrow Hill with St. Mary's Church to the south of the Borough, are significant components of local identity and sense of place. The topography of the Borough and the prevailing building heights across Harrow's suburban districts are such that views and glimpses of these features can be enjoyed as part of the experience of moving through, or living within, the Borough. Views towards the Green Belt are a reminder of the proximity of Harrow's suburbs to the countryside, and appreciation of the changing seasons, whilst views towards Harrow on the Hill and St. Mary's Church reinforce the historical and cultural importance of that place.

2.38 The Harrow Views Assessment (2012) assessed 38 local views and vistas to consider whether they should qualify as locally protected views in accordance with the London View Management Framework and Policy 7.12 *Implementing the London View Management Framework* of the London Plan (2011). The Assessment found that 11 of the views should be protected in accordance with the Framework. They comprise views from within the urban setting of central Harrow, medium range views from within open space, and long range views from open space on high ground. Each of the 11 views is identified on the proposals map for Harrow and by virtue of this policy have full status as part of the development plan for the Borough. Planning applications for proposals affecting a protected view should be accompanied by an analysis that explains, evaluates and justifies any visual impact on the protected view. The methodology for assessing development in relation to the landmark viewing corridor and wider setting consultation area of protected views is set out in the London View Management Framework.

2.39 The Council will safeguard the protected views from intrusive development or that which would otherwise be detrimental to their enjoyment and setting. Poorly located and designed buildings, and those of inappropriate height, could significantly detract from these views which are an important characteristic of the Borough. Viewpoints are a valuable amenity for residents and visitors alike and should be maintained, and where possible enhanced, for all to enjoy. Harrow's attractive skyline ridges and landscape features can be enjoyed from vantage points throughout the Borough. New development may provide opportunities to open up new local views and vistas, or to create new landmarks in the townscape; where such opportunities exist they should be fully exploited through the design and layout of buildings and spaces.

2.40 Proposals that are not consistent with this Policy and the London Plan will be refused.

Protected Views within an urban setting

1. Harrow View

2.41 The Harrow View viewing location extends southwards from the junction of Harrow View with Radnor Road and Buckingham Road to the the point contiguous with the north boundary of St. Saviour's Court and No. 48 Harrow View, as defined in the Harrow Views Assessment (2012). From this viewing location Harrow on the Hill is prominent on the skyline with St. Mary's Church a clearly visible feature atop the wooded hill. The Council will control development in the foreground and middle ground to conserve the clear views and prominence of Harrow on the Hill, and buildings that would exceed the maximum height indicated in the Assessment will not be permitted. No new structures will be permitted in the background of the view that would breach the current skyline formed by Harrow on the Hill and St. Mary's Church.

2. Roxborough Road Bridge

2.42 To the west of the main road bridge over the Metropolitan and Chiltern railway lines is a separate bridge for cyclists and pedestrians. On the north side of this bridge, as defined in the Harrow Views Assessment (2012), is a location that provides both a long range view towards Harrow Weald Ridge and a short range view towards Harrow on the Hill and St. Mary's Church. The location demonstrates the prominence of Harrow on the Hill in the context of existing mid-rise buildings in the centre whilst simultaneously being one of the few points close to the town centre that also achieves views Harrow Weald Ridge, providing the viewer with a strong sense of place. The Council will control development in the foreground and middle ground to maintain or enhance the prominence of Harrow on the Hill and to conserve the continuity of the Harrow Weald Ridge line. Buildings that would exceed the maximum height indicated in the Assessment will not be permitted. No new structures will be permitted in the background of the view that would breach the current skyline formed by Harrow on the Hill and St. Mary's Church.

3. St. Ann's Road

2.43 The St. Ann's Road viewing location occupies the pedestrianised, civic space in front of St. George's Shopping Centre and the Royal Oak Public House in the heart of Harrow town centre, as defined in the Harrow Views Assessment (2012). The location provides a close range 'canyon' view towards Harrow on the Hill and St. Mary's Church framed in this town centre setting between buildings located either side of Clarendon Road. The Council will control development in the foreground and middle ground to de-clutter the view and where possible enhance the setting of St. Mary's Church in the view. Buildings that would exceed the maximum height indicated in the Assessment will not be permitted. No new structures will be permitted in the background of the view that would breach the current skyline formed by Harrow on the Hill and St. Mary's Church.

4. Gayton Road

2.44 The Gayton Road viewing location occupies a small area of public realm to the west of the junction of Gayton Road with Lyon Road, as defined in the Harrow Views Assessment (2012). The location provides a close range view of Harrow on the Hill as an elevated, wooded feature in the skyline which contrasts starkly with the foreground buildings. The Council will control development in the foreground and middle ground to maintain or enhance the visibility of Harrow on the Hill. Buildings that would exceed the maximum height indicated in the Assessment will not be permitted. No new structures will be permitted in the background of the view that would breach the current skyline formed by Harrow on the Hill and St. Mary's Church.

Protected medium-range views from open space

5. Capital Ring, Harrow School Playing Fields

2.45 The Capital Ring forms a continuous inner⁽¹²⁾ orbital walking route that passes through green areas including the Metropolitan Open Land around Harrow on the Hill. The viewing location relates to a section of the Capital Ring to the west of Watford Road, as defined in the Harrow Views Assessment (2012). The open foreground accentuates the prominence of Harrow on the Hill whilst the absence of background development in the view mean that the Hill and St. Mary's Church remain the focal point. The Council will control development in the foreground and middle ground to conserve the existing uninterrupted views of Harrow on the Hill and St. Mary's Church. Buildings that would exceed the maximum height indicated in the Assessment will not be permitted. No new structures will be permitted in the background of the view that would breach the current skyline formed by Harrow on the Hill and St. Mary's Church.

6. Harrow Recreation Ground

2.46 The Harrow Recreation Ground viewing location occupies the area to the north of the open space at its entrance/exit point with Cunningham Park, as defined in the Harrow Views Assessment (2012). From this viewing location Harrow on the Hill is prominent on the skyline with St. Mary's Church a clearly visible feature atop the wooded hill. The Council will control development in the foreground and middle ground to conserve the clear views and prominence of Harrow on the Hill, and buildings that would exceed the maximum height indicated in the Assessment will not be permitted. No new structures will be permitted in the background of the view that would breach the current skyline formed by Harrow on the Hill and St. Mary's Church.

7. West Harrow Recreation Ground

2.47 The West Harrow Recreation Ground viewing location occupies an area alongside the main footpath which traverses the open space between Wilson Gardens and The Ridgeway, as defined in the Harrow Views Assessment (2012). From this viewing location Harrow on the Hill is prominent on the skyline with St. Mary's Church a clearly visible feature atop the wooded hill rising above a long terrace of two storey dwellings in the middle ground. The Council will control development in the foreground and middle ground to conserve the clear views and prominence of Harrow on the Hill, and buildings that would exceed the maximum height indicated in the Assessment will not be permitted. No new structures will be permitted in the background of the view that would breach the current skyline formed by Harrow on the Hill and St. Mary's Church.

Protected long-range views from open space

8. The Grove

2.48 The Grove viewing location is situated on the upper reaches of this north facing hillside open space, as defined in the Harrow Views Assessment (2012). From this viewing location Harrow Weald Ridge forms a panorama that can be appreciated in the context of the foreground open space and the mid-rise buildings of Harrow town centre in the middle ground. The Council will control development in the foreground and middle ground to maintain the panoramic views and

12 As distinct from the 'outer' orbital route formed by the London Loop.

to ensure that the general level of development within Harrow town centre does not exceed the maximum height indicated in the Assessment. Any significant built mass should ensure that Harrow Weald Ridge remains the prominent feature from this viewing location.

9. Capital Ring, Football Lane

2.49 Although not strictly open space, the viewing location at the top of Football Lane, Harrow on the Hill, forms a part of the Harrow section of the Capital Ring orbital walking route (see view 5) and is defined in the Harrow Views Assessment (2012). The location provides an impressive long range view over foreground buildings towards central London; Wembley Stadium and several of London's iconic tall buildings are clearly visible. The Council will control development in the foreground to ensure that this panoramic view remains open. Development in the middle ground is not within the Harrow's control but the Council will nevertheless object to proposals in neighbouring boroughs towards important central London buildings in this panorama view. Changes to the background of this view are likely but would not change the character or value of this view.

10. Old Redding

2.50 The Old Redding viewing location occupies a public car park and associated picnic area on high ground at Harrow Weald Ridge, as defined in the Harrow Views Assessment (2012). The location provides a long distance panorama across central London and Surrey, with Harrow on the Hill and St. Mary's Church clearly visible features on the middle ground. The Council will control development in the foreground and middle ground to conserve the existing uninterrupted panorama. Buildings that would exceed the maximum height indicated in the Assessment will not be permitted. No new structures will be permitted in the background of the view that would breach the current skyline formed by Harrow on the Hill and St. Mary's Church.

11 Stanmore Country Park Extension, Wood Farm

2.51 Planning permission has been granted for an extension to Stanmore Country Park on land at Wood Farm which includes high ground at Harrow Weald Ridge. The proposed viewing location, as defined in the Harrow Views Assessment (2012), would provide publicly accessible long range views towards central London, Wembley Stadium and Harrow on the Hill and St. Mary's Church. Protection will be afforded to this view upon implementation of the approved (or any alternative) Country Park Extension securing future public access to the identified viewing location. The Council will control development in the foreground and middle ground to conserve the existing uninterrupted panorama. Buildings that would exceed the maximum height indicated in the Assessment will not be permitted. No new structures will be permitted in the background of the view that would breach the current skyline formed by Harrow on the Hill and St. Mary's Church.

SHOPFRONTS AND ADVERTISEMENTS

Policy 4

Shopfronts and Signs

A. Proposals for shopfronts and signs will be approved where:

- a. they are in scale and proportion to the host building and appropriate to the character of the area in which it is located;
 - b. they do not adversely affect pedestrian or highway safety;
 - c. they would preserve or enhance heritage assets having regard to the design and materials of shopfronts, including any traditional or original features that should be retained, and the number, siting and illumination of signs;
 - d. the shopfront would secure inclusive access; and
 - e. the illumination of signs and shopfronts would not detrimentally affect the amenity of neighbouring occupiers or the character or appearance of a conservation area.
- B. Security shutters should be of an open mesh design and, wherever possible, should be located internally.

Reasoned Justification

2.52 For many pedestrians and shoppers, the ground floor frontages of buildings provide the principal perception of the quality of the built environment in town centres and neighbourhood parades. Well designed, practical shopfronts can make a positive contribution to the townscape and success of the Borough's shopping areas. The criteria in this policy will also apply to proposals for blinds, canopies and development on shop forecourts.

2.53 New or altered shopfronts should respect the building and local townscape. Designs should be informed by the architecture of the building and the surrounding area: whether the shop is located within a 1930s Metroland parade or an historic, village centre. In some circumstances a high quality, contemporary shopfront design may be the appropriate response to the host building and its setting. Particular care will be needed when designing shopfronts for listed buildings (including those on the local list) and for buildings within conservation areas.; in such circumstances, the Council will seek to replace existing unsympathetic shopfronts with designs that enhance the appearance both of the host building and the character of the area. Where surviving traditional shopfronts contribute to the character or appearance of an area their retention and repair will be encouraged.

2.54 Both individually and cumulatively, minor development such as shopfronts, security shutters and signs can influence perceptions of the accessibility and security of an area. Consistent with the principles of lifetime neighbourhoods, the Council will seek to ensure that new shopfronts achieve inclusive access for all and that projecting signs, A boards and associated paraphernalia do not cause an obstruction to pedestrians and wheelchair users. A proliferation of solid security shutters create a fortress-like atmosphere in town centres and neighbourhood parades when premises are closed, perpetuating fear of crime and personal safety. Shutters with a transparent 'open mesh' design help to maintain visual interest and, along with a mix of appropriate town centre uses, help to enliven town centres during the evening. Open mesh designs will therefore be sought where shutters are proposed, even if they are replacing existing solid shutters or surrounding shopfronts have predominantly solid shutters. Where possible, shutters should be sited internally to minimise their visual impact in the streetscene. Proposals for security shutters which adversely affect listed buildings and conservation areas will not be permitted.

Policy 5

Advertisements

- A. Proposals for advertisements on buildings and freestanding units will be approved where:
- a. they do not adversely affect the visual amenity of the area, having regard to the character and use of the area;
 - b. they do not adversely affect the amenity of residential occupiers by reason of siting, illumination or noise;
 - c. they are appropriate in scale and illumination to the location and, in the case of advertisements on buildings, the host building;
 - d. they contribute to the creation of lifetime neighbourhoods by rationalising street clutter and help to achieve an inclusive, legible environment;
 - e. they contribute to the safety of the environment for pedestrians, cyclists and drivers;
 - f. they do not impede any existing or proposed surveillance equipment, and contribute positively to public perceptions of security; and
 - g. they do not adversely affect the amenity of any residential or sensitive area.
- B. Advertisement hoardings will be appropriate in non-residential areas where they screen vacant or derelict sites, or sites where development is imminent.

Reasoned Justification

2.55 Proposals for advertisements on buildings (other than signs which form part of shopfront proposals - see Policy 4 above), freestanding advertisements and hoardings will be considered in relation to their impact upon amenity and public safety. Well designed and considerately located, commercial advertisements add to the interest and vibrancy of town centres and other commercial areas. Other advertisements the subject of control may be used to identify uses and occupiers within a building or area, and properly thought out this utilitarian form of advertising contributes positively to the legibility of the urban environment. However over-sized, insensitively sited and inappropriately illuminated advertisements can be unsightly, detract from the character of an area and run counter to the creation of safe, accessible environments.

2.56 Advertisements within residential areas will rarely be consistent with their amenity and character, and should be avoided. Care will also be needed at the interface of commercial and residential areas to ensure that proposals are sensitive to the change in character and do not adversely affect the amenity of the residential area. Advertisements which are illuminated or emit noise, such as those which provide a moving display, have considerable potential to cause nuisance to residential occupiers. In the more commercial context of town centres illuminated and moving

display units are to be expected, but should nevertheless have regard to residential premises above ground level. Intermittent illumination and advertisements above ground floor level with the potential to cause nuisance to residential will be resisted.

2.57 Freestanding advertisement units should not add to street clutter and obstructions in the public realm. Where there is already a plethora of advertising material in the public realm, every opportunity will be sought to rationalise this as part of the Council's commitment to creating lifetime neighbourhoods. Units should be sited in a manner which maintains free pedestrian flow, enhances perceptions of security and considers the needs of those with physical impairments, including the blind. They should achieve a safe environment for pedestrians, cyclists and motorists. In areas with CCTV coverage, or where there are realistic proposals for new public surveillance schemes, the location of advertisements must not undermine the effective operation of the system by reducing camera sight lines⁽¹³⁾.

2.58 Advertisements that are fixed to buildings should be appropriate in scale both to the building and the location. Advertisements on flank walls which are unduly dominant by reason of size and/or illumination, are unlikely to be acceptable.

2.59 Areas that are sensitive to advertisements include the Green Belt, Metropolitan Open Land, other open space, Areas of Special Character and conservation areas. Listed buildings (including locally listed buildings) are also sensitive to advertisements, and the act of fixing the advertisement may require listed building. Proposals should not adversely affect these sensitive components of Harrow's environment, nor their setting.

2.60 Large advertisement hoardings will only be appropriate in non-residential areas in Harrow, and in the circumstances set out in the Policy. General use of large advertisement hoardings which are detrimental to amenity and inappropriate in their context will be resisted.

AREAS OF SPECIAL CHARACTER

Policy 6

Areas of Special Character

- A. Proposals affecting an area of special character will be considered having regard to:
 - a. the impact of the proposal upon the strategic value of the area of special character;
 - b. the desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character;
 - c. the protected views to and from areas of special character.
- B. Proposals that would realise sustainable opportunities for increased appreciation of, or public access to, areas of special character will be supported.
- C. Proposals that would substantially harm an area of special character, or its setting, will be refused.

13 The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 include the operation of any device used for the purposes of security or surveillance as a factor relevant to public safety.

Reasoned Justification

2.61 Rising above the predominantly two storey, suburban development of the central lowland areas, Harrow's areas of high ground are of strategic importance to the character and distinctiveness of the Borough. Pinner Hill and Harrow Weald Ridge provide an elevated horizon of tree cover and open countryside which spans across the north of the Borough and acts as a visual reminder that Harrow is an outer-London borough, a transition between the highly urbanised characteristics of central & inner London and the more rural character of the counties beyond. Harrow Hill is a topographical feature with an identifiable profile to the south of the Borough, forming the verdant 'shoulders' upon which sits St. Mary's Church and supplemented by a substantial body of open space around the Hill's lower slopes. Harrow Weald Ridge, Pinner Hill and Harrow on the Hill contain a significant number of the Borough's heritage assets. Harrow on the Hill is also of cultural importance as the Borough's principal historic settlement and as the location of Harrow School.

2.62 Reflecting the strategic importance of these parts of the Borough, the Harrow Core Strategy⁽¹⁴⁾ (2012) retains their designation as areas of special character and undertakes to manage development to maintain their special character. The extent of the areas of special character is delineated on the Harrow proposals map.

2.63 Proposals affecting an area of special character, which may include proposals on sites outside as well as those within an area of special character, will be considered having regard to:

- **The impact of the proposal upon the strategic value of the area of special character**

2.64 The strategic value of the Harrow Weald Ridge and Pinner Hill area of special character is as a significant landscape backdrop with extensive tree cover and major open areas. The Council will retain existing woodlands and seek to maintain the cumulative contribution of small groups and individual trees to the area of special character by resisting incremental losses. The boundaries of the Harrow Weald Ridge and Pinner Hill area of special character largely coincide with those of the Green Belt and this underlines the strategic importance of the area's openness, to be safeguarded from inappropriate development. Proposals that would conspicuously urbanise parts of the area of special character, or incrementally erode the quality and character of its open land as a countryside and natural environment, will be resisted.

2.65 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, and the setting created by the Hill's tree cover and major open areas. The Council will ensure that the visual prominence of the hilltop settlement is preserved within its setting, and seek to maintain the cumulative contribution of groups and individual trees to the area of special character by resisting incremental losses. 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. Metropolitan Open Land is afforded the same level of protection as the Green Belt and will therefore be safeguarded from inappropriate development. Proposals that would reduce the openness or damage the integrity of Metropolitan Open Land surrounding Harrow Hill, including that adjacent to but outside of the area of special character, will be resisted.

14 See Core Policies CS3 *Harrow on the Hill & Sudbury Hill*; CS6 *Pinner & Hatch End*; and CS10 *Stanmore & Harrow Weald*.

- **The desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character**

2.66 The Council will attach substantial weight to the preservation or enhancement of features that contribute to the significance of areas of special character.

2.67 As described above, parts of Harrow Weald Ridge, Pinner Hill and Harrow on the Hill provide substantial tree cover and extensive tracts of open and natural land. These in turn give rise to environmental consequences that make a positive contribution to their special character. In particular, they provide significant areas or relatively low light, air and noise pollution, as well as places for undisturbed habitat formation and wildlife movement. Proposals should avoid harm to these and other environmental features that contribute to the area of special character.

2.68 Harrow on the Hill contains the Borough's highest concentration of listed and locally listed buildings, and much of its built environment also benefits from conservation area designation. The architectural quality of development atop the Hill, particularly that associated with Harrow School and which features in views of the Hill from surrounding vantage points, contributes significantly to the area's special character and should be retained. Proposals that would prejudice the architectural quality of Harrow on the Hill, or damage the setting of buildings of architectural quality within the area of special character, will be resisted. The Council will support appropriate proposals that enhance the legacy of the built environment of Harrow on the Hill for future generations.

2.69 Heritage assets feature in each of the areas of special character. The townscape of Harrow on the Hill is a crucial component of its heritage as the principal, historic settlement in the modern Borough. At Pinner Hill and Harrow Weald Ridge historic farm complexes, cottages, villas and lodges, among other heritage assets, are valuable components of the areas' countryside and rural character. Proposals should avoid harm to heritage assets that contribute to the special character of these areas.

2.70 In landscape terms, the skyline of Harrow Weald Ridge and Pinner Hill on the horizon, and the distinctive profile of Harrow on the Hill, are closely related to the strategic value of these areas of special character and will therefore be protected from intrusive development. However other features such as ponds, meadows, hedges, ancient field patterns, dykes and ditches may also be important to the special character of the areas, and should be protected.

- **The protected views to and from areas of special character**

2.71 The value of protecting the Borough's areas of special character, and their features, is diminished if they cannot be seen and appreciated from within the urban and suburban environment. Equally, by virtue of their topographical attributes, the ability to visit areas of special character and enjoy the views that they afford over the Borough and Greater London is also a part of their special character. Views to, and from, Harrow Weald Ridge and Harrow on the Hill have been assessed and found worthy of protection under Policy XX. Proposals should not appear conspicuous in a manner harmful to areas of special character, or unduly obscure or compete with the prominence of these areas.

2.72 There are already many opportunities for residents and visitors to access and enjoy areas of special character. The London Loop strategic walking route passes through Pinner Hill and Harrow Weald Ridge, whilst the Capital Ring is routed through Harrow on the Hill. Bentley Priory

Open Space, Stanmore Country Park and Stanmore Common all provide opportunities for the appreciation of the natural environment in Harrow Weald. The proposed extension to Stanmore Country Park would both increase public access to land within the Harrow Weald area of special character and provide a new, public viewpoint towards Harrow on the Hill and central London. Sustainable proposals, for enhanced public access to and appreciation of areas of special character, will be supported.

2.73 Proposals that, having regard to the criteria set out in this policy and other material considerations, would lead to substantial harm to an area of special character or its setting, will be refused.

CONSERVATION AND HERITAGE 3

Development Management Policies Pre-Submission DPD

3 CONSERVATION AND HERITAGE

INTRODUCTION

3.1 Harrow benefits from a surprisingly diverse historic environment. From archaeological remains associated with the Romans and Saxons, the surviving village settlements and farm complexes of rural Middlesex, the estates of Harrow School and former country houses, to the garden suburbs, Art Deco flamboyance and Modernist buildings associated with the Borough's rapid development in the 1930s. These and many other heritage assets provide a point of reference in the cultural distinctiveness of the Borough and their conservation enables both residents and visitors to appreciate Harrow's history. They also represent a precious inheritance, to be passed-on for future generations to understand and enjoy.

3.2 The historic environment of the Borough comprises:

- 28 conservation areas
- over 300 statutory listed buildings
- 4 historic parks and gardens
- 9 scheduled ancient monuments
- over 700 locally listed buildings
- 2 locally listed parks and gardens
- 9 archaeological priority areas

3.3 The Borough's conservation areas are shown on the Harrow proposals map and further information about the history, special interest and management of these areas has been produced by the Council in a series of conservation area supplementary planning documents, including character appraisals and management strategies. Similarly, the historic parks and gardens are shown on the Harrow proposals map and nationally registered ones can also be found on the English Heritage list which identifies them. More information about locally historic parks and gardens can be found via the conservation pages of the Council's website.

3.4 The statutory register of buildings of outstanding historical or architectural interest is maintained by English Heritage and includes a summary identification of the building and some justification for listing with each entry. The Council maintains a compendium list of all buildings within the Borough that appear on the statutory register as well as a separate register of buildings which are considered to be of local historic or architectural interest. These can be downloaded via the conservation pages of the Council's website.

3.5 The extent of scheduled ancient monuments and archaeological priority areas are shown on the Harrow proposals map. The Greater London Sites and Monuments Record, maintained by English Heritage, provides a computerised record of information regarding London's archaeological and historic fabric.

3.6 English Heritage's Heritage at Risk register provides details of designated heritage assets, namely listed buildings, scheduled ancient monuments, registered parks and gardens and conservation areas, that are vulnerable to decay and neglect, together with classification by priority and condition. The register is updated annually.

3.7 Taken together, these sources form the current historic environment record for the Borough. Further information for individual heritage assets may also exist from other specific sources, such as previous planning applications, applications for grant funding, etc. Additions to the historic environment record for the Borough may be made, from time to time, and will be made publicly available via the conservation pages of the Council's website.

3.8 The National Planning Policy Framework (2012) requires local planning authorities to set out a positive framework for the conservation and enjoyment of the historic environment. National guidance on best practice in conservation is contained within the *Historic Environment Planning Practice Guide* (2010)⁽¹⁵⁾. Harrow's Core Strategy provides a spatial strategy for accommodating the Borough's development needs without compromising the integrity of heritage assets. The following policies allow individual proposals to be managed in relation to the significance of any heritage assets affected and the degree of any impact, and for the consideration of enabling development where necessary. Supplementary planning documents, character appraisals, management strategies and other non-statutory documents complete the positive framework for development and investment in Harrow's historic environment.

ALL HERITAGE ASSETS

Policy 7

Heritage Assets

- A. When assessing proposals affecting heritage assets, priority will be afforded to the conservation of the assets affected and their setting as appropriate to the significance of the assets. Proposals that secure the preservation, conservation or enhancement of a heritage asset and its setting, or which secure opportunities for sustainable enjoyment of the historic environment, will be approved. Proposals that would harm, or lead to the loss of, the significance of heritage assets will be refused where appropriate.
- B. Applications for proposals affecting heritage assets will be required to:
 - a. demonstrate an understanding of the heritage asset including its significance and the contribution of their setting to that significance;
 - b. explain how the significance of the heritage asset has informed the proposal;
 - c. show at an appropriate level of detail on the drawings or in other material how the proposal relates to the heritage assets affected.

Where relevant, the application should also explain how any harm to or loss of heritage assets or its setting is considered to be justified, including consideration of alternative schemes.

15 Published jointly by the Communities and Local Government department, English Heritage and the Department of Culture, Media and Sport.

- C. The impact of proposals affecting heritage assets will be assessed having regard to:
 - a. emerging or adopted supplementary planning documents, including character appraisals and management plans or other relevant documents;
 - b. relevant issues of design and character including proportion, scale, height, massing, bulk, alignment, materials, historic fabric, use, features, location, relationship with adjacent assets, setting, layout, plan form and landscaping;
 - c. the preference to be afforded to proposals that both conserve and sustain heritage assets and their setting;
 - d. any sustainable economic benefits;
 - e. the need to mitigate climate change and to ensure that heritage assets are resilient to the effects of climate change; and
 - f. the desirability of increasing understanding, interpretation and public access of heritage assets.
- D. The Council will use planning conditions and planning obligations where necessary to ensure the preservation, conservation or enhancement of heritage assets and their setting, and to secure the exploitation of opportunities for the sustainable enjoyment and increased understanding of the historic environment.

Reasoned Justification

3.9 Heritage assets are buildings, monuments, sites, places, areas and landscapes that have a degree of significance meriting consideration in planning decisions because of their heritage interest⁽¹⁶⁾. Collectively and individually they are a unique, irreplaceable resource to be sustained for the present and future generations to understand and enjoy. Heritage assets fall into two broad categories: those that are formally designated under statutory provisions and referred to as 'designated' assets; and those that are identified by the Council and referred to as 'non-designated' assets. For the avoidance of doubt, this policy applies to proposals affecting designated and non-designated heritage assets, as well as the setting of these assets⁽¹⁷⁾. The significance of a heritage asset will be informed by its designation and, where relevant, its grade. However this should not be interpreted as meaning that lower grade and non-designated heritage assets do not matter. The Council is committed to the conservation, preservation and enhancement of all heritage assets in the Borough.

3.10 Consistent with the National Planning Policy Framework (2012), the Council will attach great weight to the conservation of heritage assets having regard to the significance of the asset and whether the proposal would lead to substantial or less than substantial harm. Many aspects of the historic environment, such as listed buildings and conservation areas, are 'living' places and

16 See National Planning Policy Framework (2012) Annex 2: *Glossary*.

17 Which might include development outside the boundary of the heritage assets affected.

need to be sustained through development, adaptation and active use. Public access to other aspects of the historic environment, such as archaeology or historic parks and gardens, can support tourism, education and the wellbeing of residents. The Council therefore recognises that change within the historic environment need not be at odds with heritage protection objectives and will approve proposals that secure the preservation, conservation or enhancement of a heritage asset. Proposals that maintain or enhance enjoyment of the historic environment and do not prejudice the integrity or conservation of the historic environment will also be approved.

3.11 The National Planning Policy Framework (2012) is clear that justification for substantial harm to (or total loss of) the significance of a designated heritage assets should be exceptional, and wholly exceptional in respect of those of higher grading, and that permission should be refused unless certain criteria are met. Proposals involving less than substantial harm to the significance of a designated heritage assets are required to be weighed against any public benefits, whilst proposals affecting non designated heritage assets should be subject to balanced judgements concerning the scale of harm and the significance of the asset.

3.12 In most situations, proposals affecting heritage assets require detailed consideration and are therefore not suited to the outline application procedure.

Understanding the significance of heritage assets

3.13 Applications for proposals affecting heritage assets should be accompanied by sufficient information to enable the significance of the heritage assets affected, and the potential impact of the proposal upon their significance, to be assessed. Specifically, applicants will be required to:

- **Demonstrate an understanding of the heritage asset including its significance;**

3.14 As a minimum, the historic environment record for the Borough should be consulted to identify the type of heritage assets relevant to the proposal. Their historic, archaeological, architectural or artistic interest should be described to a level of detail proportionate to the significance of the asset and the potential impact of the proposal on that significance. In some cases more detailed information may also be necessary, the scope of which should be agreed with the Council as part of the pre-application process. For example, this might include desk-top analysis, map regression (changes to historic maps over time), topographic sources, community consultation, national and local records or an expert assessment. There are several established registers that can be used to help identify appropriately qualified individuals or organisations⁽¹⁸⁾.

- **Explain how the significance of the heritage asset has informed the proposal; and**

18 Such as The Institute for Archaeologists (IfA); The Institute of Historic Building Conservation (IHBC); The Institute for Conservation (ICON); The Royal Institution of Chartered Surveyors; and The Institute for Civil Engineers and the Institute for Structural Engineers who operate a joint register.

3.15 The research undertaken to understand the significance of heritage assets relevant to the proposal should be used to inform the proposal and eliminate where possible harmful impacts. This should be documented and submitted with the application to explain to all those involved in the planning application process how the proposal has been informed by, and responds to, the significance of the heritage asset.

- **Show at an appropriate level of detail on the drawings or in other material how the proposal relates to the heritage assets affected.**

3.16 Sufficient visual and other information should be submitted with the application to show how the proposal relates to the heritage assets affected. The appropriate level of detail will be determined by the nature of the proposal and the number and significance of heritage assets affected.

3.17 Where a proposal would cause harm to, or loss of, heritage assets or their setting the applicant should explain how this is considered to be justified by weighing up the scale of any harm or loss against the significance of the heritage asset and the resulting public benefit. Overriding public benefits which are considered to outweigh damage to heritage assets must be robustly demonstrated. Evidence of consideration of alternative proposals that could have a less harmful impact on the significance of heritage assets would also be required.

Assessing impacts upon heritage assets

3.18 The information submitted with the application will provide the evidential foundation for determining a proposal's impact upon heritage assets. In assessing the impact of a proposal upon the significance of heritage assets, the Council will have regard to:

- **Emerging or adopted supplementary planning documents, character appraisals, management plans, strategies or other relevant documents;**

3.19 Supplementary planning documents (SPDs) together with accompanying character appraisals and management plans have been published for the Borough's conservation areas. Similarly, an SPD has been published for the Bentley Priory site, and a draft SPD is forthcoming for locally listed buildings. English Heritage also produce documents providing guidance on the conservation of heritage assets⁽¹⁹⁾. Where relevant to a proposal the detailed policies and guidance set out in these documents, and further information relating to the significance of these assets such as historic Ordnance Survey maps will be a material consideration. Significant weight should be attached to supplementary planning documents which have been prepared in accordance with statutory procedures, incorporating formal stages of public consultation.

- **Relevant issues of design and character including proportion, scale, height, massing, bulk, alignment, materials, historic fabric, use, features, location, relationship with adjacent assets, setting, layout, plan form and landscaping;**

19 Such as *Conservation Principles: Policies and Guidance* (2008).

3.20 These are the main issues to consider in proposals for additions and alterations to heritage assets, and new development affecting heritage assets, as they have the potential to affect their significance. Replicating a particular style may be less important, though there are circumstances where it is appropriate. Design should take account of such factors as: the significance of nearby assets; topography; general character of the area; diversity or uniformity in style of the building and area, construction, materials, detailing, decoration and period of existing buildings and spaces; urban grain; current and historic uses; landscaping; and views (public and private). It would not normally be acceptable for new work to dominate the original asset or its setting in either scale, material or as a result of its siting. Historic fabric and features are always an important part of the significance of heritage assets and there is therefore a presumption in favour of their retention as part of any good conversion or alteration. The junction between new work and existing fabric needs particular attention. Where possible it is preferable for new work to be reversible, so changes can be undone without harm to historic fabric, but reversibility alone does not justify alteration.

3.21 New openings, such as windows and doors, can adversely affect the significance of heritage assets and need to be considered in the context of the architectural and historic significance of the asset. These may be more likely to be acceptable if located on less prominent elevations or follow the character of the building, for example, agricultural rather than domestic style openings for barn conversions. Rooflights may be more appropriate in agricultural and industrial buildings than dormers. In some circumstances the unbroken line of a roof or face of an elevation may be an important contributor to its significance.

3.22 Removal or change to historic shopfronts (including stall-risers, glazing, blinds, doors, fascias etc), or introducing shopfronts where none are present can affect the significance. External roller shutters are unlikely to be suitable, whereas laminated glass and internal chain-link screens are more likely to be acceptable. Doors and windows are frequently key to the significance of a building. Change is therefore advisable only where the original is beyond repair, it minimises the loss of historic fabric and matches the original in detail. Secondary glazing is usually more appropriate than double-glazing where the window itself is of significance. As with the building as a whole, it is more appropriate to deal with timber decay and similar threats by addressing the cause of the decay rather than treating the symptoms, but where remedial works are shown to be necessary, minimum interference to achieve reasonable long term stability is the most sustainable approach.

3.23 There is a presumption in favour of retaining the existing or original location and layout of heritage assets as this contributes to their historical context and meaning. Similarly, there is a presumption in favour of the original use of a heritage asset since this is most compatible with its character and fabric. Securing the appropriate and viable use of a heritage asset that is compatible with its character and fabric in the long term is an important part of its conservation. Some degree of compromise in use may assist in retaining significance such as having less daylight than usually expected. Setting is the surroundings in which an asset is experienced, some of which make a positive contribution to or better reveal their significance. It can extend some distance from the site. It is expressed by visual considerations and other environmental factors such as noise, traffic, and the historic relationship between places. For example, buildings often have an important established relationship with existing or former surrounding landscaping. Proposals to alter landscaping are more likely to be acceptable if based on a well-researched understanding of this. English Heritage provide detailed guidance on the setting of heritage assets in their document entitled: 'Setting of

Heritage Assets' (October, 2011). Proposals for below-ground (subterranean) development and modifying internal layouts can impact upon the significance of heritage assets and so many of these issues will be just as relevant as when assessing externally visible alterations.

- **The preference to be afforded to proposals that both conserve and sustain heritage assets and their setting;**

3.24 Consistent with the principles of sustainable development, preference will be given to proposals that secure the future of heritage assets without harming their significance. This preference should inform the nature of the proposal and the issues described above. Proposals that involve harm to the significance of a heritage asset will not be accepted where it is apparent that reasonable, preferable alternatives exist.

3.25 Where there is conflict between proposals that conserve and sustain heritage assets, and the requirements of other plan policies, supplementary planning documents and Building Control standards, the Council will seek to apply those requirements flexibly to secure the best possible proposal for the heritage assets affected. Where there is irreconcilable conflict and subject to statutory minimum standards, the desirability of preserving, conserving or enhancing the heritage asset may be given over-riding weight over the other relevant requirements.

3.26 Proposals that secure the maintenance, repair, restoration and reuse of heritage assets will be supported, particularly those listed in the 'heritage at risk' register produced by English Heritage. However where there is evidence of deliberate neglect or damage, the deteriorated state of the heritage asset should not be taken into account. The Council will use powers under the Town and Country Planning Acts and seek prosecution when necessary to prevent deterioration from deliberate neglect or damage to heritage assets.

- **Any sustainable economic benefits;**

3.27 The survival of heritage assets is usually best achieved by ensuring that they are supported by viable economic uses compatible with the character and fabric of the asset which secure their repair and on-going maintenance needs in the long term. The adaptation of heritage assets need not be more expensive or difficult than replacement. It is quite possible that the recycling of existing buildings at a site may cut the overall financial cost of development and even save time. Appropriate uses can breathe new life into listed buildings and conservation areas, and support opportunities for people to enjoy historic parks and gardens or to visit archaeology. Proposals which offer sustainable economic benefits and make positive use of heritage assets to stimulate environmental and community regeneration will be supported.

- **The need to mitigate climate change and to ensure that heritage assets are resilient to the effects of climate change; and**

3.28 Proposals involving heritage assets can often provide opportunities to reduce their contribution to climate change and to increase their resilience to the anticipated consequences of climate change. Such an approach is consistent with heritage-led regeneration. Examples include funding of public realm improvements to encourage walking and cycling; sustainable drainage techniques to reduce flooding occurrences; and seeking the reuse of heritage assets

to retain embodied energy and to minimise the consumption of new building materials, energy and generation of construction waste. Where appropriate, heritage assets can also be modified to reduce carbon dioxide emissions for example by allowing greater use of renewable energy and options for insulation. Intrusive interventions, such as external mounting of microgeneration technology, can harm significance. Where proposed, a temporary, reversible installation will generally be preferable. The creative adaptation of heritage assets can dramatically reduce the whole-life energy costs and waste impacts that would result from demolition and replacement. Detailed advice on how heritage assets can be adapted without harming significance is available from English Heritage. Proposals for large-scale schemes have a positive role to play in the mitigation of climate change but where they may impact upon significance of a heritage asset would need to be carefully considered to minimise or eliminate the impact.

3.29 Opportunities should be fully exploited where appropriate. Consistent with Harrow's Core Strategy (2012), where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of the heritage asset.

- **The desirability of increasing understanding, interpretation and public access of heritage assets.**

3.30 Development and uses affecting heritage assets may provide opportunities to better reveal the significance of an asset or for people to enjoy it. Investigation of an asset and documentation of the findings may increase understanding of the history and significance of the asset. It is therefore an exercise of public benefit and so recording may be a requirement for a development, using planning obligations or conditions as explained below. Accessibility enhancements and the provision of interpretation facilities could improve levels of local appreciation of 'hidden' assets such as below-ground archaeology. The planning authority will continue to make any information it holds about the significance of the historic environment as part of plan-making or development management publicly available for example via its production of Supplementary Planning Documents. And increased public access to Harrow's heritage assets as part of the London-wide annual Open House and Open Parks and Gardens weekends could widen appreciation of the Borough's heritage and its Greater London context.

Planning obligations and conditions

3.31 Planning Obligations and conditions can be used to secure actions or other details necessary to ensure that a development is acceptable. The tests for using Planning Obligations and planning conditions are set out in the National Planning Policy Framework (2012).

3.32 Where the tests are satisfied and having regard to significance of the heritage asset, the Council will use planning conditions to ensure that developments affecting heritage assets are executed to an appropriate level of detail and quality of finish. For extensions, alterations and new buildings conditions can effectively ensure that appropriate materials, brick bonds and mortars are used. Where a proposal involves change of use the planning authority may consider the impact on the building and its setting of potential future permitted development on significance. This could mean the proposal is unacceptable in principle or consideration could be given to conditions preventing or limiting such future permitted development. Where a proposal involves a change to a use from which future permitted development could harm the significance of the asset, consideration could be given to conditions preventing or limiting such future permitted development.

They can also help to protect heritage assets or features within their setting, such as trees and other landscaping, during construction work. However conditions will not be used as a substitute for the submission of information that should be supplied with the application prior to its determination.

3.33 Planning Obligations will be used to secure necessary enhancements to heritage assets or mitigation of harm to the significance of assets. Restoration works funded by enabling development (see Policy XX below) will normally be secured through a Planning Obligation, whilst benefits offered in terms of public access to heritage assets will also be an appropriate matter for an Obligation. Where complete or partial loss of the significance of a heritage asset has been justified through the application process a Planning Obligation may require developers to record and advance understanding of the asset⁽²⁰⁾ and for proper archiving arrangements, including funding, to be secured. The extent of the recording and archiving requirements will be proportionate to the nature and level of the asset's significance. It is likely that the Council will require any archive generated to be deposited with a local museum, library or other public depository willing to receive it. Similarly a Planning Obligation may prevent demolition within conservation areas or other losses until contracts are in place to secure the implementation of replacement development.

3.34 Where there is sound evidence to suggest that a proposal may reveal previously undiscovered components of interest of an existing heritage asset, or lead to the discovery of new heritage assets, a Planning Obligation may be used to secure a watching brief or other appropriate method for reporting, recording and if necessary securing the retention of significant discovered remains.

Policy 8

Enabling Development

- A. Whether the benefits of enabling development to secure the future conservation of a heritage asset outweigh the disbenefits of that development, proposals will be assessed having regard to:
- a. the significance of the heritage assets affected and the contribution of their setting to that significance;
 - b. the impacts upon the heritage assets and their setting; and
 - c. the long term future of the heritage assets affected.
- B. Enabling development will only be approved where:

20 Note however that such a record is not as valuable as retaining the significance of a heritage asset and so should not be a factor in deciding whether a proposal that would result in a heritage asset's destruction should be given consent.

- a. it is the only viable means of securing the long term future of the heritage assets affected; and
- b. the enabling development is the minimum necessary to secure the long term future of the heritage assets affected.

Reasoned Justification

3.35 Enabling development is the means of securing the long-term future of a heritage asset when conservation through development in compliance with policy cannot do so. For the avoidance of doubt, this policy applies to proposals affecting designated and non-designated heritage assets, as well as the setting of these assets⁽²¹⁾.

3.36 By definition, enabling development should be a tool of last resort after all other reasonable avenues that would secure the asset's survival have been exhausted. Proposals for enabling development will be assessed having regard to the significance of the heritage asset affected and its setting, the impact of the enabling development (and any other components of the proposal) upon the significance of the heritage assets and the likely prospects for the future of the heritage assets in the long term. Information submitted in accordance with criteria A and B of policy X7 will provide the evidential foundation for assessing these aspects of a proposal for enabling development. Detailed guidance on how an applicant might make an enabling development application and how to assess proposals against the above criteria is set out in English Heritage's guidance on enabling development.

3.37 Enabling development will be supported by the Council where:

- **It is the only viable means of securing the long term future of the heritage assets affected; and**

3.38 Applicants will be expected to demonstrate that there is no other source of funding that can reasonably be expected to secure the asset's conservation and maintenance for the foreseeable future, including evidence that other potential owners or users of the site have been sought through appropriate marketing. The enabling development must be necessary to resolve problems arising from the inherent needs of the heritage asset, rather than the circumstances of the present owner or the purchase price paid.

- **Where the enabling development is the minimum necessary to secure the long term future of the heritage assets affected.**

3.39 The level of enabling development must be the minimum necessary to secure the future conservation of the heritage asset and it should mitigate as far as possible the harm caused by conflict with other planning policies. Enabling developments that seek solely to fund repairs or resolve existing maintenance problems are unlikely to be acceptable; proposals should deliver viable uses and management arrangements that secure the heritage asset's conservation and ongoing maintenance for the foreseeable future.

21 Which might include development outside the boundary of the heritage assets affected.

3.40 Proposals for enabling development that would materially harm the significance of the heritage asset or lead to detrimental fragmentation of the management of the asset will be refused.

CONSERVATION AREAS

Policy 9

Conservation Areas

- A. When assessing proposals affecting conservation areas substantial weight will be given to the preservation or enhancement of the character or appearance of the areas.
- B. The Council will preserve the character or appearance of conservation areas and their setting by:
 - a. resisting the loss of buildings, views or other features that make a positive contribution to the character or appearance of the conservation area;
 - b. resisting alterations, extensions and new development that would be detrimental to the character or appearance of the conservation area; and
 - c. resisting the introduction of uses that would be detrimental to the character or appearance of the area.
- C. The Council will seek to enhance the character or appearance of conservation areas by:
 - a. supporting the redevelopment of sites that detract from the character or appearance of the conservation area;
 - b. supporting alterations, extensions and new development that would enhance the character and appearance of the conservation area;
 - c. exploiting opportunities to restore lost features or introduce new ones that would enhance the character and appearance of the conservation area; and
 - d. securing the implementation of improvement actions set out in relevant conservation area supplementary planning documents, character appraisals and management strategies.

Reasoned Justification

3.41 Conservation Areas are areas formally recognised as being of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Once designated, some developments that would otherwise be permitted development require planning permission, and there are special controls over the demolition of unlisted buildings and works to

trees without Tree Preservation Orders. In some of Harrow's conservation areas, further controls⁽²²⁾ over permitted development have been put in place to prevent the character or appearance of the whole of a conservation area being eroded by many small, incremental changes. It is therefore advisable to contact the Council before undertaking demolition, tree works and development within a conservation area to establish whether or not permission is required.

3.42 The Planning (Listed Buildings and Conservation Areas) Act (1990)⁽²³⁾ requires those exercising planning functions within a conservation area to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. The Council is committed to the conservation, preservation and enhancement of all heritage assets in Harrow and will therefore attach substantial weight to the preservation or enhancement of the Borough's conservation areas. For the avoidance of doubt, this policy will apply to all proposals affecting conservation areas, including proposals outside but within the setting of the conservation area affected.

3.43 The Council will preserve the character or appearance of conservation areas by:

- **Resisting the loss of buildings or other features that make a positive contribution to the character or appearance of the conservation area;**

3.44 The Council has prepared supplementary planning documents, including appendices of character appraisals and management strategies for conservation areas which identify the architectural and/or historical importance of each area. Buildings and other features, such as trees, boundary treatment, gaps/spaces, which contribute positively to the character or appearance of the area should be retained. The demolition of buildings which make a positive contribution, or damage to/loss of the positive attributes of such buildings, will be treated as substantial harm and will therefore require clear and convincing justification consistent with the approach set out in the National Planning Policy Framework (2012). The loss of other important features that make a positive contribution to character or appearance will also be resisted, including those that would lead to substantial, cumulative harm if repeated throughout the conservation area.

3.45 Where demolition or substantial loss of buildings is justified but would nevertheless leave a harmful gap within the conservation area, the Council will resist the demolition or substantial loss in the absence of acceptable, detailed proposals for the redevelopment of the site and a contract for the work has been secured. Where there is an acceptable proposal for redevelopment a Planning Obligation will usually be required (see paragraph XX).

- **Resisting alterations, extensions and new development that would be detrimental to the character or appearance of the conservation area; and**

3.46 Alterations and extensions to existing buildings and new development will be required to preserve the character or appearance of the conservation area affected. The Council's supplementary planning documents, character appraisals and management strategies for conservation areas should be used in the formulation of proposals, and attention should be paid to the relevant issues of design and character including proportion, scale, height, massing, bulk, alignment, materials, historic fabric, use, features, location, relationship with adjacent

22 Known as Article 4 Directions.

23 Section 72(1)

assets, setting, layout, plan form and landscaping (see Policy XX). Alterations, extensions and new development that would be detrimental to the character or appearance of conservation areas will be refused.

- **Resisting the introduction of uses that would be detrimental to the character or appearance of the area.**

3.47 Some of Harrow's conservation areas focus on town/village centres but many are wholly residential in character. Proposals should preserve the existing character of use(s) where this is a positive attribute of the conservation area. For example, the conversion of ground floor shop premises to residential use is unlikely to preserve the appearance of an historic 'high street', whilst the introduction of significant commercial activity to a wholly residential area may be at odds with its special suburban character.

3.48 The Council will seek to enhance the character or appearance of conservation areas by:

- **Supporting the redevelopment of sites that detract from the character or appearance of the conservation area;**

3.49 The redevelopment of some sites within conservation areas may offer the opportunity to remove buildings or other features that detract from the character or appearance of the conservation area. Proposals that secure the redevelopment of such sites will be supported where, as a minimum, the character or appearance of the conservation area would as a result be preserved. Proposals that would be detrimental to character and appearance, will be refused.

- **Supporting alterations, extensions and new development that would enhance the character and appearance of the conservation area;**

3.50 Well designed and executed alterations, extensions and new development can enhance the character and appearance of the conservation area. Examples include the replacement of earlier, unsympathetic alterations/additions with new work at least equal to or better than the quality of the original buildings within the conservation area, or proposals that help to reveal the significance of buildings or other important features within the conservation area. When assessing whether proposed alterations, extensions and new development achieve enhancement, particular attention will be paid to the relevant issues of design and character including proportion, scale, height, massing, bulk, alignment, materials, historic fabric, use, features, location, relationship with adjacent assets, setting, layout, plan form and landscaping (see Policy XX).

- **Exploiting opportunities to restore lost features or introduce new ones that would enhance the character and appearance of the conservation area; and**

3.51 Some proposals may offer the opportunity to restore lost layouts, views/vistas, landscaping, boundary treatment or other features of significance to the conservation area. Similarly, opportunities may exist through new development to introduce new features. Where the restoration of lost features or the introduction of new ones would enhance the conservation

area, particularly those opportunities already identified in supplementary planning documents and associated character appraisals and management strategies, the Council will attach a high priority to their realisation.

- **Securing the implementation of improvement actions set out in relevant conservation area supplementary planning documents, character appraisals and management strategies.**

3.52 Similarly, the Council will seek to implement the actions set out in the conservation area supplementary planning documents, including the appendices of character appraisals and management strategies which have been formulated to secure enhancements over the life of the plan. Where appropriate, a Planning Obligation will be used to secure the delivery or a contribution towards the delivery of actions that are relevant to a proposal.

3.53 The Planning (Listed Buildings and Conservation Areas) Act (1990) imposes a duty on local planning authorities to consider and keep under review which parts of their area should be designated as conservation areas. The National Planning Policy Framework (2012) is clear that, when considering new conservation areas, the concept should not be devalued through the designation of areas that lack special interest. As part of Harrow's commitment to the conservation, preservation and enhancement of heritage assets the Council will continue to keep under review existing and potential new conservation area designations. To warrant continued or new designation as a conservation area the Council will require that the area possesses two or more of the following characteristics:

- contains a high concentration of listed buildings, whether statutorily or locally listed;
- is of historical, social, economic and / or architectural merit;
- contains a high proportion of buildings built prior to 1920, which remain largely unaltered;
- is a post 1920 area containing buildings that are innovative in planning or architectural detail and where a large proportion remain unaltered;
- contains a significant group of buildings with distinct physical identity and cohesiveness; and/or
- is an area which has a special quality because the site layout and landscaping are of exceptionally high quality and / or contains historic open space, natural landmarks or topographical features.

3.54 A full suite of conservation area supplementary planning documents, including appendices of character appraisals and management strategies will be in place by 2015 and will be kept under review, or updated as necessary, to reflect any resulting changes to the number or extent of conservation areas in the Borough. The Council will also keep under review the effectiveness of Article 4 Directions and the need for new ones, where control over permitted development is considered necessary to preserve or enhance the special interest of conservation areas.

LISTED BUILDINGS

Policy 10

Listed Buildings

- A. When assessing proposals for works to, or otherwise affecting, a statutory listed building substantial weight will be given to the preservation of the building or its setting including any features of special architectural or historic interest which it possesses.
- B. The Council will preserve listed buildings and their setting by:
 - a. only permitting substantial harm to, or loss of, grade II listed buildings in exceptional circumstances;
 - b. only permitting substantial harm to, or loss of, grade I or grade II* listed buildings in wholly exceptional circumstances;
 - c. resisting proposals that would harm the character or features of special architectural or historic interest of a listed building, or compromise the building's setting; and
 - d. supporting proposals that would secure the preservation of the building, its character and any features of special architectural or historic interest which it possesses, or enhance the building's setting.

Reasoned Justification

3.55 Statutorily listed buildings are important because they represent the best of the nation's architectural and historic built heritage. The list is maintained by the Secretary of State for Culture, Media and Sport. All entries on the statutory list are classified as either:

- Grade I: Buildings of exceptional interest;
- Grade II*: Particularly important buildings of more than special interest; or
- Grade II: Buildings of special interest which warrant every effort to preserve them.

3.56 It is advisable to contact the Council before commencing works on a statutorily listed building or a building within its curtilage to establish whether or not listed building consent will be required. Listed building consent is required for any works, either internal or external, which in the Council's judgement would affect the special character of a listed building. Consent may also be required for alterations, development or demolition of buildings and structures within the curtilage of a listed building. Although some works of upgrading such as new bathroom units are unlikely to need consent, new services both internal and external can have a considerable, often cumulative, effect and may require consent. Restoration of a listed building requires its alteration and is almost always likely to require listed building consent. Even when undertaking repair, care is needed to maintain the integrity of a heritage asset. Some repair techniques, such as the use of cement-based mortars in place of softer lime, will affect the integrity of the existing heritage asset and cause permanent damage. Even the most minor repairs can sometimes have an impact on the archaeological interest of a listed building. So, repair works to Listed Buildings may require consent and it is advisable to check with the Council prior to works.

3.57 The Planning (Listed Buildings and Conservation Areas) Act (1990)⁽²⁴⁾ requires those considering applications for works to a listed building and exercising all other planning functions which affect a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Council is committed to the conservation, preservation and enhancement of all heritage assets in Harrow and will therefore attach substantial weight to the preservation of listed buildings and their setting.

3.58 The Council will preserve listed buildings and their setting by:

- **only permitting substantial harm to, or loss of, grade II listed buildings in exceptional circumstances;**

3.59 The National Planning Policy Framework (2012) is clear that substantial harm to, or loss of, grade II listed buildings should be exceptional. Where exceptional circumstances cannot be demonstrated, proposals involving substantial harm to or the loss of grade II listed buildings will be refused.

- **only permitting substantial harm to, or loss of, grade I or grade II* listed buildings in wholly exceptional circumstances;**

3.60 The National Planning Policy Framework (2012) is clear that substantial harm to, or loss of, grade I and grade II* listed buildings should be wholly exceptional. Where wholly exceptional circumstances cannot be demonstrated, proposals involving substantial harm to or the loss of grade I or grade II listed buildings will be refused.

- **resisting proposals that would unnecessarily harm the features of special architectural or historic interest of a listed building, or compromise the building's setting; and**

3.61 The Council will only permit alterations, extensions or other development affecting a listed building that preserves its character and setting, and any features of architectural or historic interest which it possesses. This will include consideration of the retention and enhancement of below ground features and small scale features, inside and out, such as historic painting schemes, ornamental plasterwork, carpenters' and masons' marks, chimney breasts and stacks, inscriptions and signs. These features frequently contribute to significance. Flooring materials will often be of interest in themselves. Additional care is needed on lower floors to ensure that archaeological interest below the finished surface is not adversely affected by proposed works. Developments within the curtilage of a listed building or adjoining buildings will only be permitted where they do not detrimentally affect the listed building's setting. This will include consideration of the retention and enhancement of the original or historic gardens and landscape features. Proposals to remove or modify internal arrangements, including the insertion of new openings or extension underground, will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations.

3.62 The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases (whether decorated or plain, principal or secondary) and other features are likely to form part of its significance. Indeed they may be its most significant feature. The sub-division of buildings, such as barns, that are significant for their open interiors,

impressive proportions and long sight lines, may have a considerable impact on significance. In these circumstances the use of pods or other design devices that allow the entirety of the space to be read may be appropriate. The introduction of new floors into a building or removal of historic floors and ceilings may have a considerable impact on an asset's significance.

3.63 Proposals involving a changes of use must also preserve the special interest of the listed building. Consideration will be given to the compatibility of the use in terms of the original function of the building, the extent and impact of alterations required to facilitate the proposed use(s), and the impact of the proposal upon the setting of the listed buildings (including any consequent changes to the appearance and use of the building's curtilage).

- **supporting proposals that would secure the preservation of the building and any features of special architectural or historic interest which it possesses, or enhance the building's setting.**

3.64 Proposals that would secure the preservation or enhancement of a listed building without compromising its integrity or setting will be supported. Examples include restoration of original building fabric, improvements to structural condition or the re-introduction of uses more compatible with the building's original purpose. Substantial weight will also be given to appropriate proposals that would increase appreciation of a listed building's special architectural or historic interest through public access agreements or other means.

3.65 The Council endeavours to ensure that listed building owners are aware of their responsibilities and will take steps to secure the proper maintenance and protection buildings when necessary. If maintenance of a listed building is seriously neglected, the Council will consider using its powers under sections 47-50 and 54-55 of the Planning (Listed Buildings and Conservation Areas) Act 1990, to secure the repair of listed buildings. Where resources permit, the Council may provide financial aid for restoration work, under section 57 of the Planning (Listed Buildings and Conservation Areas) Act 1990. In order to reduce the risk of theft of architectural fabric from historic buildings during major works, the Council may require details of site security arrangements to be agreed in advance of commencement and be implemented in accordance with the agreed arrangements.

Policy 11

Locally Listed Buildings

- A. When assessing proposals affecting locally listed buildings, including those that would involve demolition or compromise a building's setting, particular consideration will be given to preserving or enhancing their local architectural or historic significance. On sites where a locally listed building has been speculatively demolished in advance of a redevelopment proposal and the retention of the building is justified, the Council will require the reconstruction of the building.

3.66 Buildings of local interest in Harrow make a special contribution to the architectural and historic identity of the Borough. They are not afforded the same, additional controls as statutorily listed buildings. However, by inclusion on the Harrow list the Council is highlighting their local

significance to be taken into consideration when making planning decisions which affect them. Where a proposal forms part of a group of locally listed buildings the Council will have regard to the impact of the proposal upon the group as a whole as well as the individual building affected.

3.67 For the purposes of Policy XX, local listing will be a strong indicator that a building (or group of buildings) is considered to make a positive contribution to the character or appearance of the conservation area in which it is situated, and consequently substantial harm or demolition will be resisted unless there are exceptional circumstances. Similarly, outside of conservation areas, a building's (or group of buildings) inclusion on the local list demonstrates special local architectural or historical significance meriting retention. To discourage speculative demolition of locally listed buildings outside of conservation areas, there will be a presumption that any subsequent proposal reinstates the building the subject of the local listing.

3.68 The Council will keep the register of locally listed buildings under review and will consider proposed additions that emerge. The selection criteria for local listing follows those set down for statutory listing, with additional emphasis on local considerations for each criterion:

- **Architectural interest:** including architectural design, decoration, craftsmanship, aesthetic merits, technical significance/display of innovation and/or good examples of a particular type of building or techniques or significant plan forms;
- **Townscape and group value:** including important contributions to unified local architectural, townscape or historic groups, areas of planned townscape, or good historical functional relationships. Some buildings have architectural or historic interest as a group. Collectively these buildings can therefore contribute significantly to the townscape, and merit listing as a group within the local list. The effect on the character of the local environment if a building were to be lost is a consideration.
- **Historic interest:** illustrating aspects of local/national social, economic, cultural or military history and/or have close historical associations with locally/nationally important people or events.
- **Age and rarity of the building:** the older a building is, and the fewer surviving examples of its kind, the more likely it is to have special interest. Those built prior to 1840 are likely to be locally listed with those built after this date requiring progressively greater justification. Its authenticity (i.e. the degree to which it has been altered and the loss of the fabric and features) is a consideration whereas the state of repair is not relevant.

3.69 The Council will prepare a guidance note to further elaborate Harrow's criteria and procedure for local listing and the use of Article 4 Directions, as well as to advise owners of the implications of local listing.

ANCIENT MONUMENTS & ARCHAEOLOGICAL PRIORITY AREAS

3.70 Harrow has a rich archaeological heritage. This reflects geology and topography of the land which attracted early settlers and the Borough's proximity to London, which has dominated trade and governance in Britain since Roman times. The landscape of Middlesex was a hospitable one, being rich in woodland, fertile agricultural land and an abundant availability of fresh water. It provided for early industrial activity and settlement, for farming and was attractive to nobility as a domestic and recreational location. The benign nature of the environment and landscape processes in the area has resulted in a legacy of well preserved archaeological features. However the greatest threat to archaeological resource has been and remains human activity particularly development.

3.71 Scheduled Ancient Monuments are those features or sites afforded statutory protection in law. These Monuments are recognised as having national importance and are therefore safeguarded for their intrinsic value for the benefit of current and future generations. However, Harrow's archaeological heritage includes some sites of more local significance as well as areas where insufficient evidence exists to justify formal scheduling. Locations within Harrow which are suspected to contain below ground archaeology, upon the advice of English Heritage, are designated as Archaeological Priority Areas.

3.72 The Council is committed to securing the conservation and understanding of all historic assets including those of archaeological interest. The Borough's Scheduled Ancient Monuments and Archaeological Priority Areas are shown on the Harrow proposals map and further information about them is available via the Council's website. The Council require planning applications on sites with known or potential archaeological interest to be accompanied with a desk-based assessment of the asset and where necessary may also require a field evaluation. When assessing the impacts of a proposal, scheduled ancient monuments and archaeological priority areas are considered to be heritage assets of very high significance.

3.73 [The Greater London Sites and Monuments Record](#) (SMR) provides a computerised record of information regarding London's archaeological and historic fabric. The information held assists with the early identification of the archaeological and historic interest of an area or site when development is proposed. English Heritage maintains the SMR for London. The Council's Conservation Team are happy to answer questions regarding archaeology but the Greater London Archaeological Advisory Service ([GLAAS](#)) should be consulted in accordance with the organisation's published charter.

Policy 12

Scheduled Ancient Monuments

- A. Proposals affecting a scheduled ancient monument will be considered having regard to:
 - a. the presumption against substantial harm to or loss of scheduled ancient monuments;
 - b. the relationship of the monument with other archeology and the wider landscape in which it should be interpreted;
 - c. the condition and management of the monument;
 - d. the existing and future security of the monument; and
 - e. the desirability of increasing understanding, interpretation and public access.
- B. The Council will support suitable proposals that secure the conservation of scheduled ancient monuments and enhance their setting. Major development and change of use proposals affecting a scheduled ancient monument will be required to provide and implement an action plan for the management of the monument.
- C. Proposals that would prejudice the fabric or setting of a scheduled ancient monument, or which do not provide satisfactory information about the implications of the proposal upon a scheduled ancient monument, will be refused.

Reasoned Justification

3.74 Scheduled ancient monuments in Harrow make a significant contribution to the Borough's heritage and are the most important sites of archaeological interest.

3.75 The owner of a scheduled ancient monument is responsible for the protection of that monument, although the Secretary of State for Culture, Media and Sport has ultimate responsibility for ensuring that its treatment, repair or use is compatible with its preservation as a monument. Anyone wishing to undertake works including farming operations, which would have the effect of demolishing, destroying, damaging, removing, repairing, altering, adding to, flooding, or covering up a scheduled ancient monument must first obtain scheduled ancient monument consent from the Secretary of State for Culture, Media and Sport. The execution of such works without the necessary consent is a criminal offence.

3.76 The desirability of preserving a scheduled ancient monument and its setting is also a material consideration in the determination of planning applications. The National Planning Policy Framework (2012) re-establishes a clear presumption against the loss of or substantial harm to a scheduled ancient monument and states that any harm to a designated heritage asset which is less than substantial must be weighed against the public benefits of the proposal. London Plan Policy 7.8 provides further planning decisions criteria relating to archaeological assets.

3.77 There are nine scheduled ancient monuments in Harrow. Each of these, and the issues that face them, are set out below.

Grim's Dyke Earthwork (AM1-AM3)

3.78 Grim's Dyke is a linear bank and ditch which had formed a continuous earthwork from the Harrow Weald Ridge, within the grounds of the Grim's Dyke Hotel, to Cuckoo Hill (and possibly beyond). Little conclusive evidence has been found to accurately date Grim's Dyke, but it is thought to date from the period just before the Roman invasion of England. The name 'Grim' is the Saxon word for devil or goblin and was given to other linear earthworks similar to the one in Harrow.

3.79 The original function of Grim's Dyke is not known, however many such earthworks served as defence lines or boundary markers in Saxon times. Archaeological excavation at Grim's Dyke Hotel carried out in 1979 found a 1st Century, or slightly earlier, fire hearth. Other discoveries include Iron Age and Belgic Pottery found during excavations of the Montesole Playing Fields in 1957.

3.80 The earthwork suffered damage as a result of searches for brickearth and gravel during the 19th Century and again, in the 20th Century, as parts were removed to facilitate residential development. Consequently the continuity of the earthwork was destroyed, and there are now three separate Scheduled Ancient Monument orders protecting the surviving sections of Grim's Dyke:

- AM1: section 1,370m north-east of Oxhey Lane, to Grim's Dyke Hotel (Harrow Weald);
- AM2: section north of Blythwood House, within Montesole Playing Fields (Pinner); and
- AM3: four linear sections between Uxbridge Road and Oxhey Lane (Hatch End).

3.81 These surviving parts of the Dyke are now partially enveloped by residential development and partially located in open space used for sports and recreational purposes. This environment and the statutory controls afforded by their scheduled ancient monument status means that there

is no direct pressure for the removal or development of the scheduled ancient monuments, but the Dyke is susceptible to deterioration arising from neglect, vegetation and poor management. Each of the three scheduled sections of the Dyke is included on the English Heritage 'at risk' register as being in decline. As a priority, proposals affecting the scheduled ancient monument should improve the setting and condition of the monument. Appropriate opportunities to improve understanding of the Dyke and public appreciation of its presence in the local environment will be supported. Major developments affecting sections of the Dyke will be required prepare and implement an action plan to safeguard, conserve and secure the future management of the relevant scheduled ancient monument.

Pear Wood Earthwork (AM4)

3.82 This earthwork is a linear bank and ditch, similar to Grim's Dyke, located within Pear Wood at Stanmore. It starts 167m west of Watling Street and has a length of 365m in a broadly south-westerly direction and is interrupted two thirds of the way along by a trackway cutting. The bank has a maximum width of 4m and in some sections reaches a height of 2m from the bottom of the ditch.

3.83 As with Grim's Dyke, the original function of the bank and ditch is not understood. However it is speculated that the earthwork at Pear Wood could be an eastward extension of Grim's Dyke.

3.84 The earthwork is recorded on the English Heritage 'at risk' register as being in a stable condition but vulnerable to vegetation. The extension of Stanmore Country Park at Wood Farm would not provide direct public access to Pear Wood but would bring the earthwork back within the direct control of the Council. Proposals affecting the scheduled ancient monument should therefore secure its conservation and future management including opportunities for managed public access to the earthwork in Pear Wood.

Brockley Hill Obelisk (AM5)

3.85 The Brockley Hill Obelisk is located within the grounds of the Royal National Orthopaedic Hospital at Stanmore. It is a stone obelisk on a square base that was erected by the Secretary to the Duke of Chandos in 1760. It commemorates the supposed site of the battle between the Catuvellauni and Caesar's tenth legion.

3.86 As part of the hospital site there is public access to the Obelisk and it is not included on the English Heritage 'at risk' register. However proposals for the redevelopment of the hospital site should ensure that it is safeguarded during demolition/construction works and that new development both enhances the setting and preserves public access to enjoy the scheduled ancient monument.

Brockley Hill Roman Settlement (AM6)

3.87 The buried Roman remains at Brockley Hill are associated with a pottery manufacturing centre and associated settlement that grew-up alongside Watling Street, a principal route within Roman Britain which is believed to have been constructed in the period AD 43-49. The road ultimately linked the channel ports of Kent to London and continued northward through the Midlands to North Wales and was therefore important for trade as well as for military and official Government use.

3.88 There are nearly 400 known Roman potteries in England and all are located with ready access to markets, raw materials, water and fuel. The site at Brockley Hill developed along both sides of Watling Street and has been the subject of a number of archaeological investigations between 1947 and 1971. These investigations revealed the remains of fourteen kilns, workshops, clay extraction pits, puddling hollows, wells, preparation floors and large accumulations of kiln waste. Dating of evidence suggests that activity began on the site around AD 60 and declined from around AD 160. Although Brockley Hill supplied London and the south-east remains of pottery manufactured at the site have been found as far afield as Cumbria and lowland Scotland.

3.89 Excavation of remains has also revealed evidence to suggest that occupation of the site continued beyond AD 160 until the fourth century. The site also includes the alignment of the earliest version of the Roman Watling Street and a section of later roadway which perpetuated the route into the Medieval and post-Medieval period.

3.90 Further remains, forming part of the Scheduled Ancient Monument, exist on the east side of Brockley Hill within the London Borough of Barnet. Although the pottery manufacturing site and associated settlement almost certainly extended along the road frontage to the south the remains in this area are not sufficiently understood to be included within the Monument designation. The alignment of the Roman and later Medieval road also continue down the hillside in the form of a hollow way. The strip of land to the west of Brockley Hill, between the junction with Wood Lane and Canons Corner, is designated as an archaeological priority areas on the proposals map.

3.91 The scheduled ancient monument will need to be safeguarded from the redevelopment of the Royal National Orthopaedic Hospital and any appropriate opportunities for the sensitive excavation of the remains, to increase understanding of the site, will be sought.

Headstone Manor Moated Site (AM7)

3.92 This scheduled ancient monument reflects the rarity of surviving moated sites in London. The moat is complete and water filled, varying in width between 7m and 14m, forming an island platform of some 65 square metres which is accessed by a red brick bridge. It is believed to date from the 14th Century, constructed as a status symbol to reflect the status and wealth of Headstone Manor's owners.

3.93 Headstone Manor is itself a grade I listed building built circa 1310 and altered/added to in the 17th and 18th Centuries. The building is of significance not only because it is the earliest surviving timber framed building in Middlesex, with examples of high quality work from each of these periods, but because it forms part of an in-tact domestic complex comprising the grade II* listed timber-framed Tithe Barn dating from 1506, and a small barn with 14th Century foundations. Up until the early 20th Century Headstone Manor had been a working farm with many other ancient farm buildings, but were subsequently destroyed after falling into disrepair. The area of the wider farm complex, to the south west of the moat, is therefore also included in the scheduled ancient monument designation.

3.94 The Headstone Manor complex is included in the Harrow & Wealdstone Area Action Plan as a site for enhanced cultural and visitor use, and the moat itself has benefited from some investigation and restoration works in recent years. The site is fully accessible to the public with interpretation facilities. Proposals for the Headstone Manor complex should preserve the setting of this scheduled ancient monument and ensure its on-going maintenance is secured as part of a management plan for the complex as a whole.

Pinner Hill Ice House (AM8)

3.95 Icehouses were subterranean structures designed specifically to store ice, removed from ponds in winter and used to help preserve food and cool drinks in summer months. They were first built in England in the early 17th Century and were commonplace by the 18th Century.

3.96 The ice house at Pinner Hill is believed to date from the mid 19th Century and formed one of the many estate buildings commissioned by Arthur William Tooke, owner of Pinner Hill House from 1844 to 1871. The structure comprises a cylindrical brick chamber & dome and access passage which originally linked back to the service quarters of the house. It represents one of only two well preserved survivals of ice houses in the Greater London area.

3.97 The ice house is located within the grounds of Pinner Hill Golf Club and is not 'at risk'. However, the ice house is not well known and there is no general public access to it.

Pinner Deer Park (AM9)

3.98 Deer parks were areas of land, usually enclosed, set aside and equipped for the management and hunting of deer and other animals and comprised a combination of woodland and grassland. It is thought that there were once as many 3,000 deer parks nationally, particularly popular during the period AD 1200 to 1350, but that by the end of the 17th Century the deer park in its original form had largely disappeared.

3.99 In the 13th Century the area of Pinner Park Farm was in the Manor of Harrow, owned by the Archbishops of Canterbury. The earliest documentary reference to Pinner Deer Park dates from 1273/74 and describes some 250 acres surrounded by a bank and double ditch. During the 15th Century the park was converted to agricultural land and the ditch and fences were replaced with hedgerows; a survey in 1986 revealed that some of the existing hedgerows date back to the late Medieval period. The Deer Park was transferred to Henry VIII in 1546 and was then owned and tenanted out by various families. The boundary of the old deer park is largely reflected in the boundary of the farmland at Pinner Park Farm which exists today, and therefore represents a rare survival of ancient landscape in Greater London.

3.100 The scheduled ancient monument at Pinner Park Farm relates to the following features of the former Deer Park:

- 350m long earth bank and double ditch to rear of Park View, Hatch End;
- 250m long earth bank and double ditch adjacent to Broadfields sports ground;
- 200m long earth bank and double ditch to rear of Moss Lane/Moss Close;
- 50m long clay dam, retaining banks and ditches forming a fish pond (now dry) rear of Moss Close; and
- 150m x 35m shallow pond (now dry) north-east of George V Avenue.

3.101 In addition to the scheduled ancient monument, all of the land at Pinner Park Farm is designated as an archaeological priority area. This reflects the broader archaeological interest of the site; for example an earlier farmhouse with a three-sided moat, located slightly to the south of the present day farm complex, is shown on a plan of 1634 and is itself thought to have occupied the site of the original hunting lodge within the deer park.

3.102 There is no general public access to land at Pinner Park Farm, but public rights of way cross the farm and parts of the scheduled ancient monument can be viewed from St. George's Avenue. The scheduled ancient monument is included on the English Heritage 'at risk' register as being in decline and particularly vulnerable to vegetation growth. Alternative uses for the land at Pinner Park Farm could improve public understanding of the historic deer park and the role of the ditch and bank earthworks within the park. Any major proposal will be required prepare and implement an action plan to safeguard, conserve and secure the future management of this scheduled ancient monument.

Policy 13

Archaeology

- A. Proposals affecting an archaeological priority area or any other non-designated archaeological remain will be considered having regard to:
 - a. the known or anticipated significance of the archaeology;
 - b. the likely implications of the proposal upon the archaeology; and
 - c. the need to preserve the archaeology in situ; or
 - d. the adequacy of arrangements for the investigation, recording, archiving and (where appropriate) curation of archaeology not requiring preservation in situ.
- B. Proposals that would lead to the destruction of important archaeological remains, or which do not provide satisfactory information about the implications of the proposal upon known or anticipated archaeology, will be refused.

Reasoned Justification

3.103 Scheduled ancient monuments protect the most important, nationally significant archaeological survivals. However, as noted above, Harrow has a rich archaeological heritage which includes some sites of more local significance as well as areas where insufficient evidence exists to justify formal scheduling. Locations within Harrow which are suspected to contain below ground archaeology, upon the advice of English Heritage, are identified on Harrow's proposal map as archaeological priority areas. A number of these are related to features the subject of formal designation as scheduled ancient monuments. This policy will also apply to any archaeological remains that come to light during the plan period and are considered by English Heritage to be significant, or potentially significant.

3.104 Where proposals may affect an archaeological priority area or other remains, the Council will expect sufficient information to be submitted by the applicant to assess the archaeological implications of development and may require an archaeological field evaluation prior to determination of the application. All planning applications involving archaeology will require the approval of English Heritage.

3.105 Developments where heritage assets of archaeological interest have been identified may be subject to mitigation measures in order to understand the asset. This might include field investigation or excavation and analysis, dissemination and archiving of results. The Council will also encourage community engagement and involvement in any programme of archaeological work.

3.106 There are nine archaeological priority areas in Harrow. These are described below.

Brockley Hill

3.107 This area is related to the Scheduled Ancient Monument at Brockley Hill (AM6). It reflects the possibility that further evidence of Roman settlement associated with the Brockley Hill pottery manufacturing centre and this part of Watling Street may be uncovered in this area.

Edgware Village

3.108 The name Edgware is believed to derive from 'Ecgi's weir fishing pool' and this reflects the historic location of the village, where the Watling Street crosses the Edgware brook. The Archaeological Priority Area reflects the extent of the Medieval village of Edgware on the west side of the A5, from the Edgware bridge extending north beyond the Station Road/Whitchurch Lane junction.

Canons Park

3.109 Tile making occurred within Canons Park in Roman times. This area seems to have been a production centre for official tiles for the provincial procurator's office, based in London. Up to 26 Roman potters may have had their workshops in the area, engaged in the production of mortaria (shallow bowls with grit inside to help grind food), flagons, amphorae, jars, lids, bowls, beakers and central heating (hypocaust) elements. The church of St. Lawrence in Whitchurch Lane has Roman tiles incorporated in the fabric of the medieval Tower and the shelters, kilns, waste dumps and clay stores associated with this industrial activity may explain some of the uneven ground in the park.

Medieval Stanmore

3.110 Although the modern district centre of Stanmore is located along Uxbridge Road, at the southern end of Stanmore Hill, evidence shows that the historic settlement of Stanmore existed further south, along Old Church Lane. The Archaeological Priority Area reflects the extent of the historic village.

Bentley Priory

3.111 The name Bentley is thought to derive from the Anglo-Saxon words for course (or bent) grass and land that is cleared for cultivation or pasture. The original priory at Bentley is believed to have been founded in 1170 and located downslope of the 18th Century building that today bears the name Bentley Priory. This Archaeological Priority Area, east of Clamp Hill, is the estimated location of the historic priory complex.

Medieval Pinner

3.112 The importance of the surviving historic development of Pinner Village, around the High Street and Church Lane, is recognised by other designations and statutory protection. The Archaeological Priority Area focuses upon the potential for below ground archaeology over a much wider area extending north towards Waxwell Lane, and east towards the summit of Wakeham's Hill where it adjoins Pinner Park Farm.

Old Pinner Deer Park

3.113 This Archaeological Priority Area supplements the formal Scheduled Ancient Monuments to provide complete coverage of the old deer park at Pinner Park Farm described in the section above.

Harrow on the Hill

3.114 The special character of Harrow Hill, as a whole, and of the historic importance of the existing development upon it is recognised by other designations and statutory protection. The Archaeological Priority Area focuses upon the potential for below ground archaeology in the area around the High Street and west slopes to reflect the historic settlement core.

Grim's Dyke

3.115 These Archaeological Priority Areas supplement the formal Scheduled Ancient Monuments to provide complete coverage of the route of Grim's Dyke as described in the section above.

HISTORIC PARKS AND GARDENS

Policy 14

Nationally Registered Historic Parks and Gardens

- A. Proposals affecting a registered historic park and garden will be considered having regard to:
 - a. the strong presumption against harm to or loss of registered historic parks and gardens;
 - b. the great weight to be placed on the desirability of preserving or enhancing the special historic interest of registered parks and gardens; and
 - c. the contribution of the wider setting of the registered park and garden to its significance.
- B. The Council will support suitable proposals that secure the conservation of registered historic parks and gardens and enhance their setting.
- C. Proposals that would prejudice the special historic interest of a registered historic park and garden, or which do not provide satisfactory information about the implications of the proposal upon a registered historic park and garden, will be refused.

Reasoned Justification

3.116 The Register of Historic Parks and Gardens of special historic interest in England is maintained by English Heritage to recognise and afford protection to designed landscapes of national importance. Entries on the register are classified as either:

- Grade I: parks and gardens of exceptional interest;
- Grade II*: parks and gardens of particular importance, being of more than special interest; and
- Grade II: parks and gardens of special interest, warranting every effort to preserve them.

3.117 Inclusion on the register does not afford additional statutory controls over development but is a material consideration when assessing proposals affecting historic parks and gardens. Registered Parks and Gardens are included in the National Planning Policy Framework's definition of designated heritage assets.

3.118 Historic parks and gardens are an important part of the Borough's heritage and environment. There is therefore a need to protect historic parks and gardens and their wider landscape settings from new development, which would otherwise destroy or harm their historic interest, and to encourage sympathetic management wherever possible. As with other designated heritage assets, the Council will attach substantial weight to the preservation and enhancement of registered historic parks and gardens.

3.119 There are four registered historic parks and gardens in the Borough. These are described below:

Grim's Dyke Gardens, Harrow Weald

3.120 The grounds were laid out and landscaped by Frederick Goodall in the mid 19th Century to form the gardens of his new house. The gardens comprise conifers and shrubs, particularly rhododendrons and azaleas, a lake (added in 1900) and a formal lawn and sunken garden. Also within the grounds are part of the Grim's Dyke earthwork, lodges, stables and the remains of the kitchen garden.

3.121 Grims Dyke is a grade II registered historic park and garden. The hotel is a grade II* listed building and the lodges/other original structures within the grounds are deemed to be curtilage listed. The part of the Grims Dyke earthwork within the grounds is a scheduled ancient monument (see above).

Canons Park, Edgware

3.122 At the heart of Canons Park is the North London Collegiate School (formerly Canons House), an 18th Century villa with 19th and early 20th Century additions and alterations. The grade II registered historic park and garden relates to the surviving formal gardens and landscaped grounds of the Canons House estate, comprising Canons Park (public open space), the grounds of the school, St. Lawrence Church, allotments, and the approach avenues from Marsh Lane and Edgware High Street.

3.123 Within the registered park and garden the former Canons House, various garden structures (balustrades, walls, terraces and temple) and estate gate piers are all grade II listed buildings. St. Lawrence Church is a grade I listed building. The registered park and garden also forms a part of the Canons Park Estate conservation area and includes the Canons Park archaeological priority area (see above).

Harrow Park (formerly Flambards), Harrow on the Hill

3.124 Forming part of the Flambards estate and originating from the 17th Century, improvements to the house and landscape forming Harrow Park were undertaken in the 18th Century and further remodelling to the house's gardens was carried out in the late 19th Century. The grade II registered park and garden relates to the remaining core of Harrow Park and comprises surviving buildings/structures, woodland, shrubbery and a lake.

3.125 The registered park and garden falls within both Harrow on the Hill Village the and Harrow Park conservation areas and contains a locally listed Victorian folly.

Bentley Priory, Stanmore

3.126 The grade II registered park and garden formed part of the extensive estate of Bentley Priory. Atop the Harrow Weald Ridge and commanding views towards central London, the 18th Century villa of Bentley Priory survives but is severed from the southern section of the surviving estate which is now public open space. The southern section is managed as a local nature reserve and comprises woodland, grassland, waterbodies and a deer park. The part which remains within the curtilage of the original building is undergoing restoration as part of the redevelopment of that site for residential use and is the subject of a supplementary planning document.

3.127 The original building of Bentley priory is grade II* listed.

3.128 The registered historic park and garden is identified on the heritage at risk register, compiled by English Heritage, as being in generally unsatisfactory condition.

Policy 15

Locally Listed Parks and Gardens

A. When assessing proposals affecting locally listed historic parks and gardens, particular consideration will be given to their local historic significance and the desirability of preserving or enhancing that significance.

3.129 In addition to the four formally designated historic parks and gardens, the Council has begun compiling a local register of Parks and Gardens which are considered to contribute to the character and local heritage of their area. The list currently comprises two sites:

- **Bernays Gardens:** surrounded by high red brick Grade II listed walls enclosing gardens with large mature trees, grassed areas, areas of York stone pavement and Cow Sheds shelter; a quaint 1930s mock Tudor single storey building comprising several rooms and covered Veranda.'
- **Pinner Memorial Park:** grounds landscaped around West House, former home of Nelson's grandson and later location of the Book of Remembrance. Grounds and house purchased through public subscription as a living memorial, for the public to enjoy, of World War 2.

3.130 The Council will keep the list of locally important historic parks and gardens under review. The following selection criteria will be used when assessing the merit of including other parks and gardens on the local list. These criteria are not mutually exclusive categories and more than one of them may be relevant in the assessment of a site.

Age

3.131 The following age bands broadly mirror the main trends in the history and development of gardening and landscape design:

- Sites of local significance with a main phase of development before 1750, where at least a proportion of the layout of this date is still evident (including components that survive only as earthworks).
- Sites of local significance with a main phase of development laid out between 1750 and 1840 where enough of this landscaping survives to reflect the original design.
- Sites with a main phase of development between post 1840 which is of local or historic landscape significance and survives intact, the degree of required special interest rising as the site becomes closer in time.
- Sites with a main phase of development laid out post-war, but more than 30 years ago, where the work is of exceptional local importance.

3.132 Although parks and gardens may have been initially laid out within a given date band, the majority will have developed as a series of additions or alterations as needs and fashions changed, with each phase of development varying in its impact on the landscape and its degree of interest. With such sites, it is the sum of the developments as seen in the landscape today which is considered. The value of a site can rest in the very fact that its present form is the outcome of a series of phases of development or of a more or less continuous sequence of change.

Influence in the development of taste

3.133 Sites which were influential in the development of taste, whether through reputation or reference in literature.

Good examples of a type

3.134 The park or garden may constitute a good surviving example of its type, such as (but not limited to):

- Sites which are early or representative examples of a style, layout or type of park or garden.
- Sites which are the work (in whole or in part) of an amateur or professional designer of local or national importance.
- Sites that became famous or well regarded in their day.

3.135 Although the image chiefly associated with parks and gardens is of impressive planting schemes, for the purposes of listing consideration will focus upon more permanent elements in the landscape such as landform, built structures, walks and rides, water features, structural shrubberies, hedges and trees, rather than the ephemeral, shorter-lived plantings of herbaceous perennials, annuals, roses and most shrubs.

Local associations

3.136 The park or garden may have an association with significant local persons or historical events. Close and direct associations with locally or nationally important people or events can make a site of more historic interest than its layout alone suggests, Both the importance of the person or event, and the importance of the park or garden in relation to the person's life and work, or in relation to the event in question, may be considered. There should be a direct link between a site and a person or event and this must be reflected in the actual layout of the site itself.

Group value

3.137 When a park or garden is of historic interest but not quite of sufficient importance in its own right to merit local listing, it may still be eligible for inclusion if it provides strong group value with buildings, with other land, or other sites, provided that this link is in itself of special historic interest. It might, for example, form an important part of the setting of an historic building, especially when it has been designed in order to do so or it may form an important element within a well planned or designed piece of townscape.

ENVIRONMENTAL SUSTAINABILITY

4

Development Management Policies Pre-Submission DPD

4 ENVIRONMENTAL SUSTAINABILITY

INTRODUCTION

4.1 The National Planning Policy Framework (2012) demonstrates the Government's commitment to pro-active management of development in relation to flood risk, and to planning for climate change impacts. It also tasks the planning system with preventing new and existing development from contributing to, or being put at unacceptable risk from, pollution and the remediation of historic pollution where appropriate.

4.2 The London Plan provides a comprehensive chapter of policies in response to climate change. Its policies include detailed development management requirements for carbon dioxide reduction, sustainable design and construction matters, flood risk management, sustainable drainage and land contamination. The local policies in this chapter respond to Harrow's Core Strategy and the Borough's evidence base, in particular Harrow's Strategic Flood Risk Assessment and Surface Water Management Plan.

SUSTAINABLE FLOOD RISK MANAGEMENT

Policy 16

Managing Flood Risk

- A. Proposals requiring a Flood Risk Assessment must demonstrate that the development will be resistant and resilient to all relevant sources of flooding. The design and layout of proposals requiring a Flood Risk Assessment must contribute to flood risk management and reduction and:
 - i. minimise the risk of flooding on site and not increase the risk of flooding elsewhere;
 - ii. wherever possible, reduce flood risk overall;
 - iii. ensure a dry means of escape for occupiers of residential development;
 - iv. achieve appropriate finished floor levels; and
 - v. not create habitable basements in areas of medium and high flood risk.
- C. Proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.
- D. Proposals that involve the loss of undeveloped floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be resisted. Opportunities will be sought through the redevelopment of previously developed sites in floodplains to restore the natural function and storage capacity of the floodplain.

Reasoned Justification

4.3 The Borough is located on the north side of the Thames basin and within the catchments of the Rivers Brent, Colne and Crane. Harrow's Strategic Flood Risk Assessments (SFRAs) have identified in broad terms areas that are liable to flooding from watercourses within the catchments of these rivers, and the associated probability of flooding (i.e. the flood zones). The strategic

assessments were prepared to inform spatial planning in the Borough and as a principal component of the evidence base that underpins planning policies and site allocations. However they are not intended to provide the detailed information about flood risk, and assessment of that risk, which is needed to inform the use and development of land at site specific level.

4.4 In urban areas such as Harrow surface water is an additional source of flood risk. Rainwater falling onto impermeable surfaces such as buildings and hard surfaces has traditionally been disposed of via Harrow's surface water drainage network. But with the incremental urbanisation of the Borough and finite drainage network capacity there has been increasing incidence of surface water flooding in recent years. Harrow's Surface Water Management Plan (2012) identifies 15 critical drainage areas susceptible to flooding from surface water and other sources.

4.5 The National Planning Policy Framework (2012) and associated technical guidance reaffirms the established, sequential approach for managing development and flood risk through the planning system. Harrow's proposals map identifies the sites allocated for development through the Harrow & Wealdstone Area Action Plan and the Site Allocations DPD. These sites have already been the subject of sequential assessment and (where necessary) exception testing through the development plan process and consequently proposals for their development, which accord with the use(s) for which they are allocated, need not be the subject of further assessment or testing. All other applications for major development, including those on allocated sites which introduce either in whole or in part alternative uses, must provide information to demonstrate that site selection complies with the sequential approach or, if it does not, that the exception test has been passed. The sequential approach should also be applied to the layout of development within the site, to direct development to the parts of the site with lowest flood risk having regard to use vulnerability.

4.6 A site specific Flood Risk Assessment (FRA) is required for:

- Proposals on sites of 1 hectare or greater in Flood Zone 1;
- All proposals for new development (including minor development⁽²⁵⁾ and change of use) in Flood Zones 2 or 3, or in an area within Flood Zone 1 which has critical drainage problems; and
- Where proposed development or change of use to a more vulnerable class may be subject to other sources of flooding.

4.7 Site specific FRAs must be informed by the most up-to-date and relevant evidence documents⁽²⁶⁾. They should identify and assess the risks of all forms of flooding to and from the development and demonstrate how these risks will be managed, taking into account climate change. For major development the FRA may also provide the opportunity to conduct more detailed modelling to refine the actual extent of predicted flood risk on the site. Using the other criteria in this policy and other relevant policies in this chapter, the FRA should also be used to demonstrate how the design and layout of the development helps to achieve the management or reduction of risk from all sources of flooding.

4.8 After the floods in July 2007, the Government commissioned the Pitt Review which concluded with 92 recommendations; the Government responded to these and the EU Floods Directive by enacting the Flood Risk Regulations (2009), a statutory instrument designating the Council as

25 For the avoidance of doubt, minor development includes householder extensions and curtilage development.

26 Currently the Level 1 & 2 Strategic Flood Risk Assessments and Harrow's Surface Water Management Plan (2012).

Lead Local Flood Authority (LLFA) and requiring it to produce a preliminary Flood Risk Assessment that includes hazard and risk maps to inform its Flood Risk Management Plan. Further legislation has been enacted in the Flood & Water Management Act (2010) which requires the LLFA to publish a Flood Risk Strategy and Flood Defence Asset register. As each of these documents is published any relevant content should also be used in the preparation of site specific Flood Risk Assessments.

4.9 The site specific FRA should be used to inform the design and layout of proposals with a view to managing and, wherever possible, reducing flood risk. The design and layout should also achieve the following flood risk management objectives, where relevant:

- **Minimise the risk of flooding on site and not increase the risk of flooding elsewhere;**

4.10 The Thames Catchment Flood Management Plan (2009) includes Harrow in its 'sub area 9' category. Recognising the largely urbanised nature of the sub area, the Plan focuses on the adaptation of the urban environment to increase resistance and resilience to flood water. The River Brent and Crane Catchment Flood Management Plans have also highlighted a requirement for both management and a reduction to flood risk as a result of new development in flood risk areas. Regard will be had to these plans when considering proposals on sites at risk of fluvial flooding in the Borough.

4.11 Surface water flooding is a major additional source of flood risk in Harrow. Within critical drainage areas, as designated in the Borough's Surface Water Management Plan (2012), proposals should include measures to mitigate the risk from surface water flooding or, where relevant, the combined impact of surface water and fluvial flooding.

- **Wherever possible, reduce flood risk overall;**

4.12 The design and layout of proposals should secure the best practicable methods, proportionate to the degree of flood risk, to ensure resistance and resilience to flooding over the lifetime of the development. Wherever possible, proposals should exploit the opportunity provided by redevelopment to reduce flood risk on the site and elsewhere.

- **Ensure a dry means of escape for occupiers of residential development;**

4.13 New residential development in areas of medium and high flood risk should be designed to be 'safe'. Proposals should demonstrate, through the site specific FRA, that future residents would have a means of escape to land at a low risk of flooding without crossing through flood water.

- **Achieve appropriate finished floor levels; and**

4.14 New residential development in areas of medium and high flood risk should be designed to be 'safe'. Proposals should demonstrate, through the site specific FRA, that the finished floor levels of the residential units are at least 300mm above the modelled 1 in 100 year plus climate change flood level. Flood resilience measures should be fitted up to 500mm above finished floor level where necessary.

- **Not create habitable basements in areas of medium and high flood risk.**

4.15 Habitable basements within areas of medium and high flood risk are inherently susceptible to flooding and will be resisted. This includes proposals where the basement forms part of the habitable accommodation for a dwelling arranged over several floors.

4.16 Having regard to the above criteria, proposals that would fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding on the site or elsewhere, will be refused.

4.17 Some of the Borough's open spaces form a part of the functional flood plain and, where this is the case, the Council will protect them for this purpose. However, as recognised in flood management plans, much of the Borough is already urbanised. Redevelopment of previously developed sites will therefore provide the only realistic opportunity to restore the natural function of the flood plain in many areas. The design and layout of proposals should be used to provide flood flow routes, on site flood storage compensation, or such other mechanisms that may be appropriate. Proposals that would further constrain the natural function of the flood plain by impeding flow or reducing storage capacity will be resisted.

Policy 17

On Site Water Management and Surface Water Attenuation

- A. Proposals for new development will be required to make provision for the installation and management of measures for the efficient use of mains water and for the control and reduction of surface water run off. Substantial weight will be afforded to the target for mains water consumption of 105 litres or less per person per day and to the achievement of greenfield run off rates.
- B. The design and layout of major development proposals will be required to:
 - a. use appropriate sustainable drainage measures to control the rate and volume of surface water run-off;
 - b. ensure separation of surface and foul water systems;
 - c. make reasonable provision for the safe storage and passage of flood water in excessive events; and
 - d. demonstrate adequate arrangements for the management and maintenance of the measures used.
- C. Proposals for householder development, minor commercial extensions and conversions should make use sustainable drainage measures wherever possible and must ensure separation of surface and foul water systems.
- D. Proposals that would fail to make adequate provision for the control and reduction of surface water run off will be refused.

Reasoned Justification

4.18 Population growth and the effects of climate change are likely to increase demands on the capacity and performance of all below ground infrastructure. They are also likely to affect the supply-demand balance for mains water, as higher levels of consumption associated with the basic needs of an increased population and public expectations about the availability of water for a range of household uses is at odds with constrained water supplies and projections of reduced summer

rainfall in the region⁽²⁷⁾. Unlike other parts of London, predominantly served by Thames Water, Harrow forms part of a water supply region that includes parts of Essex, Hertfordshire, Bedfordshire, Surrey and Buckinghamshire. Veolia Water Central Ltd, which serves the supply region, has published a Water Resources Management Plan (2010) to forecast the supply/demand balance for the region over the period to 2035, taking into account housing/population growth and projections of reduced availability resulting from climate change. The Management Plan relies on water use efficiency in new development and metering of existing dwellings, in conjunction with leakage reductions, to negate the need for new water resources during the plan period. New development in Harrow must therefore contribute to water-use efficiency in the supply region to ensure that sufficient mains supply is maintained for the population without the need for new water resource infrastructure.

4.19 Recognising the urgent need to make more sustainable use of mains water throughout the capital, Policy 5.15 *Water Use and Supplies* of the London Plan applies a target of 105 litres or less per person per day to new residential development. This represents a substantial reduction below existing average consumption in London of 161 litres per person per day⁽²⁸⁾ but is nevertheless an imperative for sustainable growth and resilience to climate change. The Council will require all development proposals to make provision for the installation and management of measures for the efficient use of mains water, and in respect of new residential development will attach substantial weight to the London Plan water consumption reduction target. Measures which seek to reduce demands upon mains water by collecting rainwater for domestic and garden use will also have strong synergy with surface water attenuation objectives.

4.20 The transformation of Harrow and neighbouring boroughs during the early 20th Century from a predominantly rural landscape to a predominantly suburban one, and the associated installation of traditional drainage infrastructure, inevitably changed the natural dynamic of surface water behaviour within the local river catchments. Subsequent urbanisation⁽²⁹⁾ has increased the volume of surface water directed into the existing drainage network and, together with mis-connections and pressure upon the foul water network⁽³⁰⁾, results in greater overland flows of surface water and increasing incidence of foul and commercial waste water flooding.

4.21 Incremental improvements to the drainage network will, from time to time, be necessary to address localised surface water flooding problems and reduce the incidence of contaminated water flooding. However a comprehensive upgrade of the surface water network, to carry increasing volumes of surface water from source to discharge in local rivers, is neither feasible nor environmentally desirable. The sustainable alternative is to modify the built environment so as to restore, insofar as possible, the natural function of river catchments and the behaviour of flood water within it.

4.22 Surface water flooding is now a problem in a number of areas throughout the Borough, and these are now identified through Harrow's Surface Water Management Plan (2012) as critical drainage areas. However, Harrow's geography - at the upper reaches of a number of river

27 See paragraph 1.31 of the London Plan (2011).

28 Environment Agency State of the Environment Report (2010) cited at paragraph 5.61 of the London Plan (2011)

29 It is calculated that there has been a 17% increase in impermeable area across north west London since 1971. See Appendix J of the Harrow Surface Water Management Plan (2012).

30 arising both from population growth, combined sewer systems and failures separate 'dual pipe' systems.

catchments which flow through neighbouring boroughs on their way to the Thames - means that continues, cumulative reliance on traditional drainage infrastructure can have consequences downstream even if it can be demonstrated that an individual proposal would be acceptable locally. For this reason, and to secure the optimum adaptation of the built environment over the plan period, all development proposals will be required to make provision for the control and reduction of surface water run-off arising from the site.

4.23 When considering the adequacy of proposed installation and management measures for the control and reduction of surface water run off, the Council will attach substantial weight to the aim of achieving greenfield run off rates⁽³¹⁾. London Plan Policy (2011) Policy 5.13 states that proposals should aim to achieve greenfield run off rates. It is recognised that the feasibility of achieving greenfield run off rates in new development will be influenced by a range of considerations, including site conditions and financial viability. Nevertheless, reflecting the policy recommendations of the Borough's strategic flood risk assessments and Surface Water Management Plan (2012), the London Plan and Harrow's Core Strategy (2012), the Council will attach substantial weight to the achievement of greenfield run off rates as a starting point for the consideration of development proposals, particularly major applications and those within critical drainage areas. Where greenfield run-off rates cannot be achieved this should be clearly justified by the applicant; however the fact that a site is previously developed and has an existing high run-off rate will not constitute justification.

4.24 The design and layout of major development proposals will be required to:

- **use appropriate sustainable drainage measures to control the rate and volume of surface water run-off;**

4.25 The use of sustainable drainage systems must be considered as part of the design and layout of all development proposals. These aim to control the surface water run-off as near to its source as possible and contribute to the reduction/management of surface water run off rates. The London Plan (2012) Policy 5.13 prescribes the following hierarchy of preference for the techniques to be used in new development:

4.26 Store rainwater for later use: Particularly suitable for urban, high density development, rainwater harvesting systems collect rainwater from impermeable surfaces and store it for non-potable water uses such as toilet flushing and washing. In more domestic situations, water butts can be cheaply and easily installed to collect rainwater for use in the garden.

4.27 Use infiltration techniques: The use of permeable paving in lieu of traditional, impermeable hardsurfacing is a simple substitution that enables rainwater to drain naturally into the ground. Rain gardens may be employed alongside impermeable surfaces to allow rainwater to be stored temporarily in the top soil before being released through a granular layer at the base. Similarly traditional soakaways allow surface water to be channeled through a granular layer before natural release into the ground, but is not suitable in areas underlain by thick clay.

4.28 Store rainwater on the surface for gradual release: Swales and detention basins can be designed into the landscaping and open space of a development and work by allowing surface water run off to be captured and stored on the surface before it is released into a

31 This will apply to previously developed, irrespective of the fact that such sites will typically have much higher run off rates, as well as to greenfield sites.

watercourse or the traditional drainage network. Ponds and wetland areas may be similarly employed. Green roofs use vegetation to intercept rainfall and so slow down the rate of discharge into the traditional network, but can also be used in conjunction with techniques for the storage of rainwater for later use.

4.29 Store rainwater in tanks for gradual release: Tanks (often below ground) may be designed into a development to enable surface water to be artificially stored and released at a rate that would mimic the natural surface water run off rate from the site.

4.30 Discharge direct to a watercourse: For sites with direct access to an open watercourse direct surface water discharge into it may be appropriate.

4.31 Only after robust investigation of the potential to use these sustainable techniques will the Council consider permitting surface water discharge into the traditional drainage infrastructure network. In critical drainage areas, where the capacity of the traditional drainage network has been exhausted, the Council will not permit development that relies solely or substantially on the network for the disposal of the site's surface water.

- **ensure separation of surface and foul water systems;**

4.32 Much of Harrow's traditional drainage infrastructure was installed as a 'dual pipe' system for the separate disposal of surface water directly into watercourses or main rivers, whilst foul and commercial waste water is piped into the trunk sewer network which flows to the Wastewater Treatment Works at Mogden. Incremental mis-connections and cross contamination between them results in foul and waste water entering the surface water system and flowing into open watercourses and main rivers, and surface water volumes putting additional pressure on the trunk sewer network resulting in flooding. Major development involving modifications to, or the extension of, the surface and foul water networks will be required maintain the separation of the two systems and put in place adequate safeguards against cross-contamination.

- **make reasonable provision for the safe storage and passage of flood water in excessive events;** and

4.33 An excessive event is one in which the design capacity of the proposed surface water drainage system is exceeded. Proposals should incorporate reasonable provisions to safely store or convey excess flood water from the site without adverse impacts upon occupiers or sensitive environmental areas.

- **demonstrate adequate arrangements for the management and maintenance of the measures used.**

4.34 Forthcoming legislation will require sustainable drainage systems to be submitted to, and be approved by, the Lead Local Flood Authority (LLFA) and SuDS Approving Body (SAB). Pending the implementation of this legislation, and to ensure the adequacy of surface water drainage over the lifetime of the development, applicants will be required to agree with the Council the arrangements for the long term management and maintenance of the proposed systems. The details will be required prior to commencement of development and should comprise: (i) the drainage site layout; (ii) details of surface water outlet from the site; (iii) proposed surface water storage including levels; and (iv) details of flow restrictions.

4.35 Without mitigation, the cumulative impact of small scale development throughout the Borough is likely to be continued pressure on the finite capacity of the traditional drainage network. Proposals for householder development⁽³²⁾, minor extensions to commercial premises⁽³³⁾ and conversions of houses and other buildings to flats should, therefore, also contribute to a reduction in the rate of surface water run off. The Council will apply criteria (B)(a) & (b) above to such proposals to secure appropriate, sustainable measures for surface water run off reduction and to ensure that connections to existing, traditional infrastructure maintains separation between the surface and foul water systems.

4.36 Policy 5.13 of the London Plan (2011) requires drainage systems to be designed and implemented in ways that deliver other policy objectives, including water use efficiency & quality, biodiversity, amenity and recreation. The Council will apply this approach to local plans and projects that dovetail with the London Plan's policy objectives, including (but not limited to) Harrow's Biodiversity Action Plan (2008) and the Green Grid.

4.37 Proposals that would fail to make adequate provision for the control and reduction of surface water run off will be refused. For the avoidance of doubt, consideration of the adequacy of provision will include the incorporation and suitability of any safeguards necessary for the prevention or treatment of polluted surface water.

RIVERS AND WATERCOURSES

Policy 18

Protection and Enhancement of River Corridors and Watercourses

- A. The design and layout of development on sites containing a main river or ordinary watercourse within the site boundary will be required to maintain an undeveloped buffer zone of an appropriate width.
- B. Applications for major development on sites containing a main river or ordinary watercourse within the site boundary will be required to:
 - a. have regard to the Thames River Basin Management Plan and the London River Restoration Action Plan;
 - b. investigate and where feasible secure the implementation of environmental enhancements to open sections of river or watercourse; and
 - c. investigate and where feasible secure the implementation of a scheme for restoring culverted sections of river or watercourse.
- C. Where on site enhancements or deculverting are financially viable but not feasible, the Council will seek a financial contribution towards relevant other projects for the enhancement or deculverting of other sections of the river or watercourse.
- D. Proposals that would adversely affect the infrastructure of main rivers and ordinary watercourses, or which would fail to secure feasible enhancements or deculverting, will be resisted.

32 Extensions and outbuildings that result in a net increase in the footprint of buildings on the site, irrespective of any existing hardsurfacing.

33 With a proposed gross footprint of 200 square metres or less.

Reasoned Justification

4.38 Watercourses in Harrow form part of the complex network of rivers and streams within the London basin that drain to the River Thames. All of the watercourses in Harrow originate within the Borough, reflecting Harrow's location at the upper reaches of the natural drainage system in London, and form part of catchments for three of the principal tributary rivers to the Thames: the Brent, the Colne and the Crane. During the early and middle part of the twentieth century, the time when Harrow saw most of its urban expansion, watercourses were regarded solely as a means of land drainage. For the most part they were engineered away from development either by redirection or, more commonly, were piped into culverted sections below ground often as part of the storm water drainage solution. Consequently, of the total 93.39 km length of water courses that run through Harrow, 39.65km (just under 43%) is culverted⁽³⁴⁾. Today, watercourses are valued as an important resource both for biodiversity and for sustainable flood management.

4.39 Rivers and streams are classified by the Environment Agency as 'main rivers' or 'ordinary watercourses'. The Borough's network of main rivers and ordinary watercourses are mapped in Harrow's Strategic Flood Risk Assessment (2009).

4.40 The Council has adopted local bylaws under the Land Drainage Act (1991) aimed at preventing flooding and remedying or mitigating any damage caused by flooding. These bylaws operate outside of the planning system but will nevertheless impact upon the design and layout of development on sites containing a river, ordinary watercourse or other drainage infrastructure. Those intending to carry out development on such sites, including permitted development, are advised to be cognisant of the bylaws when formulating proposals. The bylaws are reproduced at Schedule XX.

4.41 The London Borough of Harrow under and by virtue of the powers and authority vested in them by section 66 of the Land Drainage Act 1991, do hereby make the following Byelaws which are considered necessary for securing the efficient working of the drainage system in their District, so far as may be necessary for the purpose of preventing flooding or remedying or mitigating any damage caused by flooding: -

4.42 The Council will seek the preservation (and where appropriate, the restoration) of undeveloped buffers alongside main rivers and ordinary watercourses throughout the Borough. Such buffers contribute to sustainable flood risk management by preserving unobstructed flood flow routes and ensuring that there is adequate space for routine and/or emergency maintenance of main rivers and ordinary watercourses. The design and layout of new development, including householder extensions and curtilage structures, will be required to maintain an 8 metre buffer either side of a main river and a 5m buffer either side of an ordinary watercourse, or such other appropriate buffer width as may be agreed by the Environment Agency and the Council.

4.43 London Plan (2011) Policy 7.28 supports the restoration and enhancement of the Blue Ribbon Network. In relation to north-west London, the network applies to the Silk Stream⁽³⁵⁾, the River Brent⁽³⁶⁾ and the River Pinn⁽³⁷⁾. Harrow's situation at the upper reaches of the London drainage system mean that there are many ordinary watercourses, forming tributaries, as well as

34 Figures taken from Harrow Biodiversity Action Plan (page 92) and include main rivers and ordinary watercourses.

35 Including the Edgware Brook.

36 Including the Kenton Brook and the Wealdstone Brook.

37 Including the River Pinn and the Roxbourne.

main rivers. In view of the potential benefits to sustainable flood risk management and biodiversity within the Borough, the Council will extend the restoration and enhancement principles which apply to the Blue Ribbon Network to all main rivers and ordinary watercourses within the Borough.

4.44 Proposals for major development on sites containing a main river or ordinary watercourse within the site boundary will be required to:

- **have regard to the Thames River Basin Management Plan and the London River Restoration Action Plan;**

4.45 Water for life and livelihoods (2009) is the Environment Agency's management plan for the entire Thames River basin. The Plan makes recommendations for the constituent catchments of which the Colne and London catchments are relevant to Harrow. The London Rivers Restoration Action Plan (2009) and its associated website provide a tool for the restoration of rivers including identification of current projects. Regard should be had to the relevant provisions of these Plans when considering enhancements to, or deculverting of, a river or watercourse within the site boundary.

- **investigate and where feasible secure the implementation of environmental enhancements to open sections of river or watercourse; and**

4.46 Open sections of river and watercourse can provide valuable natural habitats and support the movement of wildlife through the urban landscape. Applicants should investigate and, where feasible, secure appropriate environmental enhancements to open sections within the site boundary having regard to the current condition of the river or watercourse, Harrow's Biodiversity Action Plan and the green grid. Examples include landscaping to restore native species or interventions to improve water quality.

- **investigate and where feasible secure the implementation of a scheme for the deculverting of pipes section of river or watercourse.**

4.47 Culverted rivers and watercourses have a finite capacity to carry water and distort their natural behaviour during storm and other flood events. Applicants should investigate and, where feasible, secure the restoration of culverted sections within the site boundary having regard to Harrow's Biodiversity Action Plan and the green grid. Restoration must include an adequate buffer flooding and maintenance, and appropriate landscaping to secure the optimum biodiversity benefits of restoration.

4.48 Consideration of feasibility includes but is not limited to the impact of enhancement or restoration upon development viability. Other components of feasibility may include, for example, the length of watercourse to be deculverted, the benefits of enhancement in the context of surrounding environmental quality, and the nature of the proposed use (particularly where a deculverted section would pose an unacceptable safety risk to vulnerable people). Where enhancements or deculverting are shown to be financially viable but not feasible for other reasons, and in view of the multiple environmental benefits of enhancement and restoration, the Council will seek an appropriate⁽³⁸⁾ financial contribution to secure the implementation of relevant projects to other sections of the river or watercourse.

38 Having full regard to the tests for the use of Planning Obligations.

4.49 In an urban environment there remains a need for built infrastructure such as flood defence structures including trash screens and bypass channels to maintain flows and improve environmental quality along rivers and watercourses. Proposals that would adversely affect the condition or functioning of river and watercourse within, adjacent to or downstream of the site, and proposals which fail to secure feasible enhancements or deculverting in accordance with this policy, will be resisted.

RESPONDING TO CLIMATE CHANGE

4.50 Meeting the challenge of climate change is central to economic, social and environmental dimensions of sustainable development⁽³⁹⁾. The London Plan (2011) seeks to control the capital's contribution to climate change with a target to reduce carbon dioxide emissions by 60 per cent (below 1990 levels) by 2025⁽⁴⁰⁾. Pursuant to this reduction target, the following energy hierarchy applies to all development proposals in London⁽⁴¹⁾:

- Be lean: use less energy;
- Be clean: supply energy efficiently; and then
- Be green: use renewable energy.

4.51 Harrow's Core Strategy (2012) provides the spatial framework for the delivery of the Borough's growth in a way that offers the potential to use less energy and which can supply energy efficiently. For major development proposals, the London Plan (2011) establishes carbon dioxide reduction targets for residential and non residential buildings, requirements for energy assessments, sustainable design principles, a hierarchy for the selection of decentralised energy systems and an expectation that on-site renewable energy generation should be used where feasible. To ensure that Harrow makes the fullest possible contribution to London's strategic carbon dioxide emissions reduction target, the following policies give effect to the London Plan energy hierarchy in respect of non-major development proposals in the Borough.

Using less energy

Policy 19

Sustainable Design and Layout

- A. Minor development proposals should:
- a. follow the sustainable design and layout principles set out in the London Plan; and
 - b. have regard to Harrow's Sustainable Building Design supplementary planning document.

39 Paragraph 93 of the National Planning Policy Framework (2012).

40 Policy 5.1 *Climate Change Mitigation*.

41 Policy 5.2 *Minimising Carbon Dioxide Emissions*.

- C. Proposals that fail to take reasonable steps to secure a sustainable design and layout of development will be resisted.
- D. Appropriate alterations and adaptations that would reduce carbon dioxide emissions from existing homes and non-residential buildings will be supported.

Reasoned Justification

4.52 Development carried out during the life of this plan may be expected to remain in situ and continue to function, without substantial adaptation, for many decades to come. Using sustainable design and layout principles, to make development as energy efficient as possible, will therefore reap immediate and long-term environmental and social benefits by meeting the resource and comfort needs of occupiers with minimal depletion of finite natural resources and helping to curb carbon dioxide emissions. The principles can also make buildings cheaper to run, to the economic benefit of future owners and occupiers.

4.53 The London Plan (2011)⁽⁴²⁾ sets out a timetable for residential and non residential major development proposals to achieve improvements upon the requirements of the 2010 Building Regulations and requires applications for major development to be accompanied by a detailed energy assessment. The Council recognises that the London Plan requirements are likely to pose a greater challenge for minor development in the Borough and will therefore apply the most up-to-date national standards⁽⁴³⁾ to such proposals and will expect sustainability matters to be addressed as part of the design and access statement that is already required with most planning applications.

4.54 The sustainable design and layout principles applicable to major development proposals are set out in London Plan (2011) Policy 5.3 *Sustainable Design and Construction*. Whilst not requiring minor development proposals to achieve the London Plan's trajectory for improvements upon the requirements of the Building Regulations, the Council will nevertheless apply the sustainable design and layout principles to small scale new residential schemes⁽⁴⁴⁾, conversions⁽⁴⁵⁾, householder development and extensions to non-residential buildings. The design and access statement should demonstrate how the principles of sustainable design and layout have been incorporated into the proposal.

4.55 Following London Plan Policy 5.3, the principles of sustainable design and layout applicable to minor development proposals are:

42 Policy 5.2 *Minimising Carbon Dioxide Emissions*.

43 Currently the Code for Sustainable Homes for residential development, and the BREEAM standards for non-residential development.

44 Comprising nine or fewer homes (gross).

45 Comprising the conversion of houses and other buildings to flats.

Minimising carbon dioxide emissions

4.56 The design and layout of buildings should utilise natural systems such as passive solar design and, wherever possible, incorporate high performing energy retention materials, to supplement the benefits of traditional measures such as insulation and double glazing. These measures will help to manage future heating costs and minimise the need for artificial cooling systems during hot periods.

Avoiding internal and urban overheating

4.57 The design and layout of buildings should make provision for natural ventilation and shading to prevent internal overheating. Externally, the use of landscaping, water features and natural as well as hard surface materials can help to mitigate the urban heat island effect. Deciduous trees are particularly beneficial where they provide shade to buildings and spaces during summer months but allow sunlight to pass through during the winter.

Making efficient use of natural resources including water

4.58 Proposals may make efficient use of natural resources by retaining existing trees and landscaping on the site, and by salvaging for re-use materials from any existing buildings or structures on the site.

4.59 As London's population continues to grow and if weather patterns change, as predicted, as a result of climate change, potable water will become an increasingly precious resource. Profligate use of potable water also has carbon dioxide implications associated with its treatment and supply. The London Plan (2011)⁽⁴⁶⁾ seeks to achieve the minimal use of mains water by requiring residential development to achieve a consumption target of 105 litres or less per person per day. Building a house to 105 litres per day will save 79 kg of carbon dioxide and 15 cubic metres of water per year.

4.60 Non-residential as well as residential development should use potable water as efficiently as possible. Appropriate measures to incorporate into development proposals would include:

- dual flush toilets;
- low flow bathroom and kitchen fittings;
- low water consumption appliances;
- durable plumbing;
- grey water and water recycling systems; and
- water butts and other on-site water retention systems.

4.61 Use of 'grey' water for functions that do not require potable water, such as toilet flushing and washing, not only helps to achieve efficient use of potable water but will also contribute to on site water management and attenuation (see [Policy XX](#)).

46 Policy 5.15 *Water Use and Supplies*.

Minimise pollution

4.62 Where relevant, the design and layout of buildings should incorporate measures to mitigate any significant noise or air pollution arising from the future use of the development. There must also be safeguards against pollution of surface water and cross contamination of the foul and surface water drainage networks (see Policy XX).

Minimise waste generation

4.63 Proposals will be required to make satisfactory on site provision for the storage and disposal of waste generated by future occupiers of the development (see Policy XX). The design and layout of the development should make provision for convenient collection of recycling materials, compostable matter and general waste which encourages the segregation of waste at source and avoids cross contamination.

Avoid impacts from natural hazards

4.64 For most development in the Borough the principal natural hazard will be that of flood risk. Proposals must comply with the sequential and (where necessary) exception tests set out in the National Planning Policy Framework (2012) and the relevant provisions of Policies XX and XX in this development plan document.

Ensuring comfort and security for future occupiers

4.65 Proposals should achieve a high standard of comfort and security for the future occupiers of the development. Considerations of internal and urban overheating (see above) will contribute to this principle, as will some of the more detailed guidance set out in the Council's Accessible Homes and Residential Design Guide supplementary planning documents.

Using sustainably sourced materials

4.66 The design and layout of proposals should seek to reduce energy consumption associated with development by using, wherever possible, renewable and sustainable sourced materials.

Promoting and protecting green infrastructure

4.67 Proposals may incorporate techniques that enhance biodiversity, such as green roofs and green walls. Such techniques will benefit other sustainability objectives including surface water attenuation and the avoidance of internal and urban cooling.

4.68 Harrow's Sustainable Building Design SPD (2009) provides further, detailed guidance in relation to the application of sustainable design and layout principles. The relevant provisions of the SPD will be a material consideration in the determination of planning applications to which this policy applies.

4.69 Having regard these principles, the Council's supplementary planning documents (including those that relate to heritage assets) and any robustly demonstrated issues of feasibility, which will be a material consideration, proposals that fail to take reasonable steps to secure a sustainable design and layout of development will be resisted.

4.70 Using Government information⁽⁴⁷⁾ about the energy efficiency of different dwelling types and the Census information about Harrow's housing stock, analysis carried out for the Local Development Framework sustainability appraisals indicates that Harrow has a substantial proportion of housing that typically performs less well in energy efficiency terms. Alterations and adaptations to the existing housing stock, to prevent deterioration and where possible enhance efficiency in the use of energy, water and other resources, will further mitigate the Borough's contribution to climate change. The Council will therefore support proposals that would reduce carbon dioxide emissions from existing homes and non residential buildings, in relation both to individual properties and groups of properties (such as blocks of flats, housing and industrial estates). However proposals must be appropriate in their context, having regard to the amenity of neighbouring or future occupiers, the character of the area and any other relevant policy considerations including but not limited to the Green Belt, heritage and biodiversity.

Supplying energy efficiently

Policy 20

Decentralised Energy Systems

- A. Proposals for decentralised energy networks will be supported.
- B. Minor development proposals should connect to existing decentralised energy networks where feasible.

4.71 The National Planning Policy Framework (2012) supports decentralised energy systems as one of the ways to increase the supply of low carbon energy. The London Plan (2011) encourages boroughs to identify opportunities for decentralised energy networks⁽⁴⁸⁾ and requires major development proposals to select energy systems in accordance with the following hierarchy⁽⁴⁹⁾:

- Connection to existing heating or cooling networks;
- Provision of a site-wide combined heat and power network; then
- Communal heating and cooling.

4.72 In response to the London Plan and the London Heat Map tool, Harrow's Core Strategy (2012) identifies the Harrow & Wealdstone Intensification Area as the location most capable of supporting to an area-based decentralised network. However this does not preclude the realisation of opportunities for decentralised networks to come forward elsewhere in the Borough. The Council

47 The findings of the 2005 English House Condition Survey Annual Report, tabulated in a joint memorandum by CLG, DEFRA, BERR and DIUS (Communities and Local Government Select Committee – The Existing Housing Stock and Climate Change Inquiry), shows the energy performance for dwellings by house type; against this criteria the proportion of dwellings with a Standard Assessment Procedure rating of less than 30 (indicating poor energy efficiency) and more than 60 (indicating relatively good energy efficiency) are given.

48 Policy 5.5 *Decentralised Energy Networks*.

49 Policy 5.6 *Decentralised Energy in Development Proposals*.

will support proposals for decentralised energy systems on individual sites and, where there is a local network and it is feasible to do so, will require proposals for minor residential and non-residential development to connect to it.

Using renewable energy

Policy 21

Renewable Energy Technology

- A. Minor development proposals should incorporate renewable energy technology where feasible.
- B. Proposals for appropriate renewable energy technology on existing homes and non-residential buildings will be supported.

4.73 The National Planning Policy Framework (2012) supports renewable energy systems as one of the ways to increase the supply of low carbon energy. The London Plan (2011)⁽⁵⁰⁾ requires major development proposals to use on-site renewable energy generation, where feasible and in the context of the energy hierarchy, to contribute to carbon dioxide reduction. The Council will apply the same approach to minor development by seeking the incorporation of renewable energy technologies where feasible having regard to the scale and nature of the proposal and development viability.

4.74 Many small-scale renewable energy technologies are now permitted development, and as such do not require planning permission from the Council. Much of Harrow's existing housing stock is of a type that typically performs less well in terms of energy efficiency (see paragraph XX above). Whilst renewable technologies do not improve the efficiency with which existing homes and non-residential buildings use energy, they reduce the demand for energy from non-renewable sources and therefore help to control climate change emissions. The Council will therefore support proposals for renewable energy technology, where planning permission is required and consistent with the London Plan energy hierarchy, which help to reduce demand from existing homes and non-residential buildings upon the national grid. However proposals must be appropriate in their context, having regard to the amenity of neighbouring or future occupiers, the character of the area and any other relevant policy considerations including but not limited to the Green Belt, heritage and biodiversity.

LAND CONTAMINATION

Policy 22

Prevention and Remediation of Contaminated Land

- A. A preliminary land contamination risk assessment will be required with planning applications for:

50 Policy 5.7 Renewable Energy.

- a. the redevelopment or re-use of land known or suspected to be contaminated; and
 - b. proposals for development or activities that pose a significant new risk of land contamination.
- B. Proposals will be considered having regard to
- a. the findings of the preliminary land contamination risk assessment;
 - b. the compatibility of the intended use with the condition of the land; and
 - c. the environmental sensitivity of the site.
- B. Proposals that fail to demonstrate that intended use would be compatible with the condition of the land or which fail to exploit appropriate opportunities for decontamination will be resisted.

Reasoned Justification

4.75 The National Planning Policy Framework (2012) is clear that the responsibility for safe development on sites affected by contamination rests with the developer and/or landowner. Nevertheless, the planning system working in conjunction with environmental health legislation has a role to play, in the public interest, by securing decontamination through redevelopment and ensuring that any new use of land is compatible with the condition of the land and any sensitive environmental areas. Policy 5.12 of the London Plan (2011) requires appropriate measures to be taken to ensure that development on previously contaminated land does not activate or spread contamination.

4.76 Harrow's Contaminated Land Strategy identifies the principal source of contaminated land risk in the Borough as being sites in (or previously in) industrial use. However other potential sources include sites used for waste/recycling processing, petrol filling stations and former railway land. In consultation with Harrow's Environmental Health department and (where relevant) the Environment Agency, the Council will endeavour to advise those proposing development or new uses on sites with known or potential land contamination issues as early as possible in the planning process.

4.77 The principal objective of this policy is to ensure that a safe and appropriate form of development can exist on the site in perpetuity with no consequential impact on the future users of the site or to neighbouring occupiers or to the environment. The consideration of proposals on land affected or potentially affected by contamination, and those that pose a significant new risk of contamination⁽⁵¹⁾ should be informed by robust and proportionate information in the form of a preliminary land contamination risk assessment. The assessment must be carried out by a competent person and as a minimum be submitted with the planning application, but ideally should also be available to inform any pre-application discussions. It should identify the nature and extent of the known or suspected land contamination, having regard to the site's history and environmental characteristics, and should demonstrate how any conflict in compatibility between the condition of land (or the risk to its condition) and its intended use would be resolved.

51 Including proposals on sites that are already contaminated where a new development or activity is considered to significantly increase the risk of further contamination.

4.78 Proposals for the redevelopment or re-use of land known or suspected to be contaminated, and proposals for development or activities that pose a significant new risk of land contamination, will be considered having regard to:

- **the preliminary land contamination risk assessment;**

4.79 The preliminary land contamination risk assessment should provide a robust foundation for the identification of risks and appraisal of options for the safe management of those risks both during development and for the end users of the site. The assessment should guide developers towards the most appropriate measures to be selected for each site, highlighting those where risks are not sufficient to warrant intervention and those where remedial action is necessary. Where remediation is necessary, the assessment should explain how and when this would be implemented and any arrangements for monitoring the effectiveness of the required actions. For proposals that pose a significant new risk of contamination, the assessment should identify the measures to be put in place to minimise that risk, arrangements for monitoring the effectiveness of those measures, and a strategy for the future remediation of the site.

- **the compatibility of the intended use with the condition of the land;** and

4.80 The condition of the contaminated land (taking into account its condition following remediation) will determine the compatibility for the intended end uses. On sites with low level contamination, re-use for some industrial activities may be compatible with a minimal degree of remediation. Conversely, sites with more significant levels of contamination and proposed for residential redevelopment may only be compatible with comprehensive remediation. Notwithstanding any safeguards set out in the preliminary land contamination risk assessment, proposals that pose a significant new risk of contamination should be avoided on greenfield sites.

- **the environmental sensitivity of the site.**

4.81 Environmental sensitivity should help to determine the most appropriate measures on sites that are to be remediated, and will inform the site suitability of proposals that pose a significant new risk of contamination. Considerations will include the relationship of the site with habitats or species of national or local biodiversity importance, the relationship with any neighbouring residential occupiers, and the presence of any potential risk to groundwater taking into account the geology of the area and any relevant information about the local water table.

4.82 Having regard to the above considerations and the desirability both of remediating land that has been contaminated, and preventing new land contamination, proposals that fail to demonstrate that intended use would be compatible with the condition of the land or which fail to exploit appropriate opportunities for decontamination will be resisted.

OPEN SPACE AND THE NATURAL ENVIRONMENT 5

Development Management Policies Pre-Submission DPD

5 OPEN SPACE AND THE NATURAL ENVIRONMENT

INTRODUCTION

5.1 Harrow enjoys a rich and diverse open and natural environment. Associated with the Borough's early 20th Century and inter-war development is a legacy of municipal parks, allotments and sports grounds. The imposition of London's Green Belt in the post war period secured the survival of a substantial tract of countryside to the north of the Borough, whilst the strategic significance of other large areas of open space is recognised and protected by designation as Metropolitan Open Land. In total there are 1,334 hectares of open space in public and private ownership throughout the Borough.

5.2 Open space is a cherished and highly valued part of the Harrow's environment, and a significant positive attribute in the quality of life for residents and visitors in outer London. As a functional asset open land enables participation in sport and informal recreation, and in an otherwise urban environment is a valuable resource for human health and wellbeing. Not all open space is accessible to the community, but that does not mean that it is not of value to people. Many parts of the Green Belt are in agricultural use but as part of the Harrow Weald Ridge Area of Special Character it nevertheless provides a strategic visual amenity to the Borough. Metropolitan Open Land around Harrow Hill forms an important open setting for the historic hilltop village and, through its use as playing fields, enables Harrow School to continue to function. Open land is also a valuable environmental asset which supports biodiversity, natural drainage and helps to mitigate the effects of climate change.

5.3 As the Borough's population grows it is likely that Harrow's open and natural environments will experience increased pressure for recreational activity, and for development. Harrow's Core Strategy resists the erosion of Green Belt, Metropolitan Open Land and open space. As part of a strategy to deliver sustainable development on previously developed land, it also seeks new provision to manage increases in recreational activity and to address identified deficiencies in existing coverage. The policies in this chapter give effect to these aims of the Core Strategy.

5.4 In terms of nature conservation, there are no habitats of European significance within the Borough and the sustainability appraisal of Harrow's Core Strategy takes into account those which are present within a 15km radius of the Borough. However there are two sites of special scientific interest in Harrow - a statutory designation of national importance - and many other sites of regional or local significance. Harrow's Biodiversity Action Plan identifies locally significant habitats and species and sets out a range of targets and actions to preserve and enhance them. The policies in this chapter provide the framework for protecting and enhancing the Borough's natural environment through the management of development.

GREEN BELT AND METROPOLITAN OPEN LAND

5.5 The National Planning Policy Framework (2012) continues to protect the Green Belt from inappropriate development. Inappropriate development is, by definition, harmful to the Green Belt. The construction of most types of new building in the Green Belt is inappropriate development, and will be resisted unless there are very special circumstances⁽⁵²⁾ which outweigh the harm to

52 Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

the Green Belt. The Framework defines the types of new building and other forms of development that need not constitute inappropriate development within the Green Belt. London Plan Policy 7.16 is also relevant to proposals in the Green Belt.

5.6 Metropolitan Open Land is a London-wide designation defined as '...strategic open land within the urban area that contributes to the structure of London⁽⁵³⁾. Policy 7.17 *Metropolitan Open Land* of the London Plan (2011) affords to London's Metropolitan Open Land the same level of protection as applies nationally to the Green Belt, including the presumption against inappropriate development and the test of very special circumstances. The provisions of the National Planning Policy Framework (2012) and the following policies will therefore apply with equal weight to proposals on Metropolitan Open Land as those within the Green Belt.

5.7 When applying the following policies, the purposes of including land within the relevant designation refers to the purposes set out at paragraph 80 of the National Planning Policy Framework (2012) in respect of the Green Belt, and the criteria set out at Policy 7.17 (D) in respect of Metropolitan Open Land.

5.8 Some parts of the Borough's Green Belt contain residential dwellings and proposals for the extension and alteration of these will be assessed in accordance with the National Planning Policy Framework and Policy 7.16 of the London Plan (2011). Residential gardens do not constitute previously developed land and proposals for their development will constitute inappropriate development within the Green Belt.

Policy 23

Redevelopment of previously-developed sites within Green Belt and Metropolitan Open Land

- A. The redevelopment or infilling of strategic and other previously-developed sites in the Green Belt and Metropolitan Open Land will be supported where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it than the existing development, having regard to:
- a. the height of existing buildings on the site;
 - b. the proportion of the site that is already developed;
 - c. the footprint and distribution of existing buildings on the site; and
 - d. the relationship of the proposal with any development on the site that is to be retained.
- B. Proposals for the redevelopment or infilling of strategic and other previously-developed sites in the Green Belt and Metropolitan Open Land will also be required to have regard to:

53 London Plan (2011) *Glossary*.

- a. the visual amenity and character of the Green Belt and Metropolitan Open Land;
 - b. the setting that openness provides for heritage assets within the Green Belt and Metropolitan Open Land; and
 - c. the contribution that the site and its surroundings make to the biodiversity.
- C. The following sites are the strategic, previously-developed sites within the Green Belt:
- Harrow College, Brookshill, Harrow Weald;
 - Royal National Orthopaedic Hospital, Brockley Hill, Stanmore;
 - Former RAF Bentley Priory, Common Road, Stanmore; and
 - Wood Farm, Wood Lane, Stanmore.

In addition to the above criteria, proposals for the strategic, previously-developed sites within the Green Belt will have regard (where relevant) to the development envelope identified on the adopted policies map, any supplementary planning document or agreed masterplan relating to the site, and the objectives of the site's redevelopment.

- D. Proposals for inappropriate redevelopment or which, for other reasons, would harm the Green Belt or Metropolitan Open Land will be refused in the absence of clearly demonstrated very special circumstances.

Reasoned Justification

5.9 Limited infilling, or partial or complete redevelopment of previously developed sites, whether redundant or in continuing use (excluding temporary buildings), is not inappropriate development in the Green Belt and Metropolitan Open Land provided that there would be no greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development⁽⁵⁴⁾. For the purposes of considering proposals for infilling or redevelopment of previously-developed sites within the Green Belt and Metropolitan Land, the following definitions will be used:

- **Infilling** Proposals for infilling will not be regarded as inappropriate development where they: (i) have no greater impact on the purposes of including land in the Green Belt and Metropolitan Open Land than existing development; (ii) do not exceed the height of the existing buildings; and (iii) do not lead to a major increase in the developed proportion of the site.
- **Redevelopment** Proposals for complete or partial redevelopment will not be regarded as inappropriate development where they: (i) have no greater impact than the existing development on the openness of the Green Belt and Metropolitan Open Land and the purposes of including land within it (and where possible, have less impact); (ii) contribute to achieving beneficial uses of the Green Belt and Metropolitan Open Land in accordance with paragraph 81 of the

54 Paragraph 89 of the National Planning Policy Framework (2012)

National Planning Policy Framework (2012); (iii) not exceed the height of the existing buildings on the site; and (iv) not occupy a larger area of the site than the existing buildings⁽⁵⁵⁾ (unless this would achieve a reduction in height which would benefit visual amenity).

5.10 The above definitions will be used to determine whether or not a proposal for infilling or redevelopment on a previously developed site constitutes appropriate development within the Green Belt and Metropolitan Open Land. However it does not follow that if a proposal complies with the relevant definition the impact upon the Green Belt and Metropolitan Open Land is automatically considered to be acceptable. The character and dispersal of proposed redevelopment will need to be considered as well as its footprint. For example many houses may together have a much smaller footprint than a few large buildings, but may be unacceptable because their dispersal over a large part of the site and enclosed gardens may have an adverse impact on the character of the Green Belt and Metropolitan Open Land compared with the current development. The location of the new buildings should be decided having regard to the openness of the Green Belt and Metropolitan Open Land and the purposes of including land in it, the objectives of the use of land in Green Belts and Metropolitan Open Land, the main features of the landscape, and the need to integrate the new development with its surroundings. The site should be considered as a whole, whether or not all of the buildings are to be redeveloped. Any proposals for partial redevelopment should be put forward in the context of comprehensive, long term plans for the site as a whole.

5.11 Where buildings are to be demolished rather than being left in a semi-derelict state pending decisions about their redevelopment, it will be necessary to keep proportionate records of those buildings for the purposes of assessing any subsequent proposals for development. The records should be verified with the Council prior to demolition. When granting planning permission for the redevelopment of previously-developed sites in the Green Belt and Metropolitan Open Land, the Council will require that buildings which are not to be retained permanently are demolished as new buildings are erected, thus keeping the total developed area under control.

5.12 The National Planning Policy Framework (2012) confirms that the essential characteristics of Green Belts are their openness and permanence, but development may also harm other characteristics. The same approach applies to Metropolitan Open Land. Proposals for the redevelopment or infilling of strategic and other previously-developed sites in the Green Belt will therefore also be required to have regard to the following characteristics:

- **the visual amenity and character of the Green Belt and Metropolitan Open Land;**

5.13 As noted at the beginning of this chapter, much of Harrow's Green Belt occupies high ground to the north of the Borough and, combined with its often wooded and agricultural land uses, justifies the designation of substantial parts as areas of special character. Even outside of such areas, the natural or countryside appearance of sites can make a significant contribution to visual amenity. Metropolitan Open Land around the slopes of Harrow on the Hill also contributes significantly to that area's special character, whilst the Metropolitan Open Land at Stanmore Golf Course provides a valuable verdant backdrop to surrounding suburban areas. Proposals should not harm the visual amenity or character of the Green Belt and

55 The relevant area will be calculated as the aggregate ground floor area of the existing buildings (the footprint) *excluding* temporary buildings, open spaces with direct external access between wings of a building and areas of hardstanding.

Metropolitan Open Land. Consideration will also be given to the impact of proposals upon light, air and noise pollution within the Green Belt and Metropolitan Open Land (paragraph XX below will be applied to proposals for development as well as for uses).

- **the setting that openness provides for heritage assets within the Green Belt and Metropolitan Open Land;** and

5.14 Heritage assets within Harrow's Green Belt include the original mansion houses and registered park and gardens of Bentley Priory and Grim's Dyke, historic farm complexes, cottages and a number of scheduled ancient monuments. As well as its crucial role at Harrow on the Hill, Metropolitan Open Land also provides a setting for the historic Headstone Manor complex and forms a substantial part of the registered park and garden at Canons Park. Where the openness of the Green Belt and Metropolitan Open Land provides a context or setting for a heritage asset that contributes to the asset's significance the Council will attach substantial weight to the preservation or enhancement of that openness.

- **the contribution that the site and its surroundings make to the biodiversity.**

5.15 The Green Belt hosts Harrow's only two Sites of Special Scientific Interest and the majority of the Borough's Sites of Importance for Nature Conservation of metropolitan and borough (grade 1 & 2) importance. Metropolitan Open Land accounts for the majority of the Borough's other Sites of Importance for Nature Conservation. The openness of the Green Belt and Metropolitan Open Land helps to sustain biodiversity by allowing comparatively free movement of wildlife between sites and by helping to sustain the environment of important habitats. Proposals should not harm the biodiversity value of the Green Belt and Metropolitan Open Land.

5.16 Harrow's Core Strategy (2012)⁽⁵⁶⁾ identifies four, strategic redevelopment opportunities within the Green Belt. This policy supports proposals for the sensitive redevelopment of these sites in a way that addresses the unique circumstances of each and which enhances the appearance and openness of the Green Belt.

5.17 Harrow College is spread over two sites with the principal campus located in Lowlands Road, Harrow town centre. The consolidation of the College onto the Lowlands Road site would release land and buildings at the Harrow Weald campus for alternative use and redevelopment. Parts of the site are substantially open in character and should remain so; redevelopment will be confined to the development envelope shown in the adopted policies map. The original college building on the site is of some local architectural and historic merit and every effort should be made to retain it. However the wider complex contains many later additions, the potential redevelopment of which could secure rationalisation of built form and enhance the site's contribution to Green Belt openness. Open land to the north of the existing complex of buildings could form an extension to Harrow Weald cemetery.

5.18 The Royal National Orthopaedic Hospital is a nationally and internationally recognised facility located in the Green Belt at Brockley Hill, Stanmore. The hospital complex is spread over a substantial site area and occupies many outdated, substandard buildings. Redevelopment of the site offers the potential to provide a modern, fit for purpose accommodation that befits the hospital's status and to improve the openness of the site by rationalising the existing complex of buildings. The desirability of providing new accommodation for the hospital is a significant

56 Policy CS7 *Stanmore & Harrow Weald*.

consideration and may constitute very special circumstances for some enabling development that would otherwise be inappropriate development in the Green Belt. The site and its surroundings include features of archaeological, biodiversity and heritage importance which must be safeguarded from the impacts of development.

5.19 The former RAF Bentley Priory occupies part of the Borough's Green Belt at The Common, Stanmore. The site was identified as surplus to Ministry of Defence requirements and vacated by the RAF in 2008. At the heart of the site is a grade II* listed former mansion house of some architectural and national historic importance. However throughout the rest of the site are many 20th Century additions and separate building complexes constructed to meet the needs of the RAF and which are now redundant. Redevelopment of the site offers the opportunity to improve the site's contribution to the openness of the Green Belt, to restore the listed building and to create a museum dedicated to the important work carried out by the RAF on the site in World War 2. The site and its surroundings include other features of historic interest, as well as archaeological and biodiversity designations, which must be safeguarded from the impacts of development. A supplementary planning document to guide the site's redevelopment was adopted by the Council in 2008.

5.20 The Wood Farm site comprises an area of mainly open land and occupies an elevated position on the Harrow Weald Ridge to the north east of Stanmore district centre, affording exceptional views to the south over much of London. Pear Wood, an area of ancient woodland, adjoins to the east and StanmoreCountryPark is located along the southern and south western boundary. Most of Wood Farm is classified as a Site of Borough Importance for Nature Conservation. Formerly a pig farm, the Wood Farm site has not been used for agricultural purposes for many years. Much of the area has been tipped, and many of the former agricultural buildings, grouped in the north east corner of the site close to Wood Lane, are now in a dilapidated state. Several substantial, but now derelict, pig farm buildings and large areas of hardstanding occupy the central part of the site. Agricultural use of the Wood Farm site is no longer considered to be viable. Inclusion of the site within the adjoining CountryPark, however, would create the opportunity to secure public access to a significant area of open space for the first time and, in addition, help to preserve the site's nature conservation interest and improve the landscape. An enabling development on part of the site occupied by former agricultural buildings, in conjunction with the removal of the derelict pig farm buildings elsewhere, would facilitate this opportunity and secure a significant and material improvement in the openness of this part of the Green Belt. A development envelope has been identified on the adopted policies map for this purpose.

5.21 Except where very special circumstances have been robustly demonstrated in accordance with the National Planning Policy Framework (2012), proposals that would harm the Green Belt or Metropolitan Open Land having regard to the criteria set out in this policy will be refused.

Policy 24

Beneficial Use of the Green Belt and Metropolitan Open Land

- A. Proposals for the beneficial use of land in the Green Belt and Metropolitan Open Land will be supported where the use would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it than the existing use, having regard to:

- a. the visual amenity and character of the Green Belt and Metropolitan Open Land;
 - b. the potential for enhancing public access within the Green Belt and Metropolitan Open Land as part of Harrow's Green Grid;
 - c. the potential use of the land for food production or community gardening;
 - d. the setting that the proposed use would provide for heritage assets within the Green Belt and Metropolitan Open Land;
 - e. the contribution that the site and its surroundings make to the biodiversity; and
 - f. the desirability of improving the quality of the environment within the Green Belt and Metropolitan Open Land.
- B. Proposals for uses which would harm the Green Belt or Metropolitan Open Land will be refused in the absence of clearly demonstrated very special circumstances.

Reasoned Justification

5.22 Harrow's Green Belt benefits from a variety of uses that help to maintain its openness and character. As well as a number of farmland and woodland areas, uses of the Borough's Green Belt include sports grounds, public open space, nature reserves and burial space. Metropolitan Open Land uses in the Borough include parks, outdoor sports pitches, a golf course and allotments. Beneficial uses of Green Belt and Metropolitan Open Land⁽⁵⁷⁾ help to sustain their openness and usefulness for the current and future generations. The Council will therefore support beneficial uses where there would be no greater impact upon the openness of the Green Belt and Metropolitan Open Land and the purposes of including land within them than the existing use⁽⁵⁸⁾ having regard to the following considerations:

- **the visual amenity and character of the Green Belt and Metropolitan Open Land;**

5.23 The visual amenity of the Green Belt and Metropolitan Open Land is in part a function of the use of land within it. Visual features such as agricultural buildings, trees, hedgerows, gates and presence of livestock contribute to the rural, countryside character of many parts of the Green Belt. In other parts, semi-natural environments such as grasslands and woodlands contribute positively to visual amenity in addition to their biodiversity importance. Outdoor sport facilities and passive recreational uses are more common in Metropolitan Open Land. The strategic significance of elevated parts of the Green Belt and Metropolitan Open Land to the amenity of the Borough is reflected in the Harrow Weald Ridge, Pinner Hill and Harrow on the Hill Area of Special Character designation, to which Policy XX also applies.

5.24 Alternative uses of land which makes a positive contribution to the visual amenity and character of the Green Belt and Metropolitan Open Land should be sympathetic to, and secure the retention or enhancement of, those qualities. Features and buildings of importance

57 The National Planning Policy Framework (2012) includes as beneficial uses: those which provide public access and opportunities for outdoor sport and recreation; those which retain and enhance landscapes, visual amenity and biodiversity; and those which improve damaged or derelict land.

58 This will include the impact of any existing development on the land and the impact of any new (proposed or potential) development associated with the alternative use.

to visual amenity and character of the should be retained wherever possible. Substantial weight will be afforded to the realisation of opportunities for enhancement of the visual amenity and character of the Green Belt and Metropolitan Open Land.

- **the potential for enhancing public access within the Green Belt as part of Harrow's Green Grid;**

5.25 Sections of the London Loop strategic walking route and local public rights of way already provide access through parts of Harrow's Green Belt and general access for the enjoyment of nature can be enjoyed at Bentley Priory open space, Harrow Weald Common and Stanmore Common. The Capital Ring strategic walking route and local public rights of way also provide access through otherwise inaccessible areas of Metropolitan Open Land. Public open space and other sites with community access make use of the Green Belt and Metropolitan Open Land to provide valuable facilities for outdoor sport and recreation. The Council will seek the retention and enhancement of access to sites within the Green Belt and Metropolitan Open Land where this already exists, and will attach substantial weight to the realisation of projects identified in Harrow's Green Grid for further improvements that achieve greater and more inclusive public access.

- **the potential use of the land for food production or community gardening;**

5.26 London Plan Policy 7.22 recognises the value of food production nearer to urban communities and particularly within the Green Belt. The Council will support appropriate uses and development that enable existing agricultural activity to continue, as well as proposals for community gardens, allotments and orchards where there would be no conflict with the other criteria set out in this policy.

- **the setting that the proposed use would provide for heritage assets within the Green Belt;**

5.27 Heritage assets within Harrow's Green Belt include the original mansion houses and registered park and gardens of Bentley Priory and Grim's Dyke, historic farm complexes, cottages and a number of scheduled ancient monuments. Where existing or previous uses of the Green Belt provide a context or setting for a heritage asset that contributes to the asset's significance the Council will attach substantial weight to the restoration or retention of those uses. In all other cases, proposed uses of Green Belt land should be compatible with the setting and protection of any heritage assets on or surrounding the site.

- **the contribution that the site and its surroundings make to the biodiversity; and**

5.28 The Green Belt hosts Harrow's only two Sites of Special Scientific Interest and the majority of the Borough's Sites of Importance for Nature Conservation of metropolitan and borough (grade 1 & 2) importance. Metropolitan Open Land accounts for the majority of the Borough's other Sites of Importance for Nature Conservation. The openness of the Green Belt and Metropolitan Open Land helps to sustain biodiversity by allowing comparatively free movement of wildlife between sites and by helping to sustain the environment of important habitats. Proposals should not harm the biodiversity value of the Green Belt and Metropolitan Open Land. Proposed uses must not harm the biodiversity value of designated sites and should sustain or enhance wildlife movement between sites within the Green Belt and Metropolitan Open Land.

- **the desirability of improving the quality of the environment within the Green Belt.**

5.29 By its nature, and taken as a whole, the Green Belt provides an area of comparatively low light, air and noise pollution. However the Green Belt comprises a range of existing uses and development and, consequently, the contribution of individual sites to these environmental characteristics is variable. Metropolitan Open Land, although more dispersed than the Green Belt, also provides a valuable antidote to light, air and noise pollution within the wider urban setting. The London Plan (2011) includes policies that deal with light, air and noise pollution⁽⁵⁹⁾ that will be applied as relevant to proposals in the Green Belt and Metropolitan Open Land. The Council will attach substantial weight to proposals which mitigate existing levels of light, air and noise pollution within the Green Belt and Metropolitan Open Land, and will resist proposals that would harm the environmental quality of the Green Belt and Metropolitan Open Land by introducing significant new sources of pollution.

5.30 Except where very special circumstances have been robustly demonstrated in accordance with the National Planning Policy Framework (2012), proposals that would harm the Green Belt or Metropolitan Open Land having regard to the criteria set out in this policy will be refused.

OPEN SPACE

5.31 In addition to the Green Belt and Metropolitan Open Land, open spaces that are of local importance are identified on the Harrow adopted policies map. They comprise parks and gardens, play areas, amenity spaces, natural conservation sites, playing pitches and other outdoor sports grounds, allotments and cemeteries/churchyards and are protected irrespective of ownership. The National Planning Policy Framework (2012) is clear that existing open space, sport and recreation facilities should not be built on unless clearly surplus to requirements, or where the loss would be replaced by equivalent or better provision in terms of quantity and quality, or where the need for and benefits of the development clearly outweigh the loss. Policy 7.18 of the London Plan resists the loss of local open space unless equivalent or better quality provision is made within the local catchment area.

Policy 25

Protection of Open Space

- A. Land identified as open space on the Harrow proposals map will not be released for development.
- B. The reconfiguration of land identified as open space on the Harrow proposals map will be supported where:
 - a. the reconfiguration is part of a comprehensive, deliverable scheme;
 - b. there would be no net loss of open space; and
 - c. the reconfiguration would achieve enhancements to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure a viable future for the open space;

59 Policy 7.5 *Public Realm*; Policy 7.14 *Improving Air Quality*; and Policy 7.15 *Reducing Noise and Enhancing Soundscapes*.

And the release would not be detrimental to any environmental function performed by the existing open space.

- C. Proposals for ancillary development on land identified as open space on the Harrow proposals map will be supported where:
- it is necessary to or would facilitate the proper functioning of the open space;
 - it is ancillary to the use(s) of the open space;
 - it would be appropriate in scale;
 - it would not detract from the open character of the site or surroundings;
 - it would not be detrimental to any other function that the open space performs; and
 - it would contribute positively to the setting and quality of the open space.
- D. Proposals that would secure the future of existing ancillary buildings on open space will be supported where:
- a. there would be no loss of necessary capacity for the proper functioning of the open space; and
 - b. there would be no harm to the quality or proper functioning of the open space as a result of the proposal.
- E. Proposals that would be harmful to open space, having regard to the criteria set out in this policy, will be refused.
- F. Proposals for the inappropriate change of use of open space will be resisted.

Reasoned Justification

5.32 Whilst the Green Belt and Metropolitan Open Land are protected for their strategic significance, it is local open spaces that provide most of the Borough's parks and gardens, play areas, amenity greenspaces, natural and semi-natural environments, outdoor sport space and allotments and which are closely related residents' homes. Local open spaces are therefore of great value as places for people to participate in organised sport, play, informal recreational activity and appreciation of the natural environment. The resulting benefits to human health and wellbeing are well documented, and the need to retain open space for these uses will continue to be important as the Borough's population grows. However local open spaces are also of great environmental value. They support habitats which contribute to biodiversity, help to mitigate air, light and noise pollution, counter the urban heat island effect and provide visual relief in the urban landscape. As areas that help to maintain the natural functioning of river catchments, by absorbing rainwater and (in some cases) providing flood storage, the value of open space as flood and drainage assets is also increasingly recognised.

5.33 Harrow's Open Space, Sport and Recreation Study (2011) highlights substantial open space deficiencies when recommended standards of provision are applied to the existing and projected future population of the Borough. The total deficiency across the Borough equated to 117 hectares of land in 2010, rising to 139 hectares in 2026. For this reason Harrow's Core Strategy (2012) makes provision for future housing growth on previously-developed land and resists the erosion of existing open space.

5.34 The quantity of open space provision is only one part of the Open Space, Sport and Recreation Study (2011). The Study also assessed the quality of provision and accessibility across the Borough. This highlighted some significant variation particularly in the quality of provision, affecting the carrying capacity and attractiveness of some facilities, and identified areas with deficient accessibility (including deficiencies against the London Plan parks categories). The Council has prepared an open spaces strategy to seek to address some of these issues on publicly owned open space. Sports clubs and other private facilities make an important contribution to open space provision in the Borough and the Council will therefore support sensitive proposals which enhance the quality and accessibility of these sites.

5.35 In view of the quantitative deficiency of open space throughout the Borough, and the Core Strategy objective to maintain and where possible increase open space provision, the release of open space for development will be resisted.

5.36 In line with London Plan Policy 7.18 B and in accordance with the quality and quantity findings of Harrow's PPG17 study 2011, the replacement of one type of open space with another will be inappropriate unless it can be demonstrated, in accordance with the PPG17 findings, that the new use would help improve deficiencies in that typology of open space in the area or lead to qualitative improvements that would outweigh the loss of the previous use.

Reconfiguration

5.37 The reconfiguration of land identified as open space can be an appropriate mechanism for addressing identified deficiencies and may provide windfall opportunities to enhance Harrow's Green Grid. It can help to reduce gaps in the accessibility of open space typologies, address qualitative issues as part of re-provision and help to increase the capacity of sites. Robust evidence will be needed to demonstrate that reconfiguration would deliver material improvements in the capacity, quality and accessibility of open space in the area which address identified deficiencies. In seeking to reduce deficiencies in one area, proposals should not result in significant new deficiencies elsewhere.

5.38 To achieve the benefits needed to justify reconfiguration, proposals must form part of a comprehensive, deliverable scheme with appropriate phasing of the built and open space components. It is unlikely that reconfiguration of open space in minor development proposals would achieve significant benefits. Reconfiguration of open space that is sought merely for the convenience of the development will not be permitted unless there are over-riding reasons in the public interest to do so.

5.39 There should be no net loss of open space as a result of reconfiguration. The reconfiguration of open space to address deficiencies will be considered as part of the 'planning gain' of comprehensive, deliverable proposals and therefore enabling development on part of the open space should not be necessary. Additional open space will be sought where any resulting increase in the capacity of the open space is not sufficient to meet the requirements that would be generated by the proposal.

5.40 The reconfigured open space must have a viable future and proposals must be accompanied by an effective Planning Obligation which provides for the future management and maintenance of the open space. The release of the open space will be resisted where the development would be detrimental to any environmental function performed by the open space.

Ancillary Development

5.41 In the longer term, the survival of local open space relies on the use and value attributed to them by the community. Functional buildings in open land enable people to continue to use and enjoy the space and can contribute to local character. Examples include park pavilions, allotment sheds and changing accommodation. Proposals for buildings in open space will be supported where they are necessary to or would facilitate the proper functioning of the open space, or are ancillary to the use of the open space (such as sports club social facilities). However buildings should be appropriate in scale, informed by the function that the building is intended to perform and the number of potential users. Sharing of facilities by multiple site users will be preferable in most instances to many smaller buildings. Sensitive design and siting of the building should ensure that buildings in open space do not detract from its open character and surroundings, and should avoid any potential for conflict with neighbouring occupiers.

5.42 Buildings in open space must not be detrimental to any environmental function performed by the open space, including but not limited to: Sites of Importance for Nature Conservation; land within flood zones 2, 3A or 3B; and land which includes or forms part of the setting of a designated heritage asset. The design of the building should contribute positively to the setting and quality of the open space and, in particular, care will be needed to avoid any harm to trees or other significant landscaping assets within or adjoining the site.

5.43 Existing pavilions and other ancillary buildings support the use of open spaces but are often in poor condition and in need of investment. Proposals for alternative uses of existing ancillary buildings can help to secure their future of these buildings, but the loss of legitimate capacity (for example, the loss of changing accommodation associated with playing pitches) risks undermining the proper functioning of the open space or generating demand for additional, replacement development within open space. Proposals for that would secure the future of existing ancillary buildings will therefore be supported only where it is clearly demonstrated that there would be no loss of necessary capacity for the proper functioning of the open space in which it is situated, and that there would be no other harm to the quality or proper functioning open space as a result of the proposed use.

Change of Use

5.44 Proposals for the change of use of open space from one typology to another should maintain the usefulness of the space relative to demand and, in so doing, help to secure its future. The justification for the proposed use, and any uses to be lost, should be informed by an up to date assessment of need for the whole Borough which takes into account the quantity, quality and accessibility of the relevant typologies of provision. The change of use should not lead to any net loss of open space nor necessitate substantial new development within open space. Consideration will also be given to the impact, if any, on any environmental function performed by the open space.

Policy 26

Provision of New Open Space

- A. Proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space. Regard will be had to the recommended standards of provision for all relevant typologies of open space.
- B. The provision of major new pieces of open space should contribute positively to Harrow's Green Grid. In major town centre developments new civic space may be required as an alternative to green open space.
- C. Proposals for major new residential development that fail to make provision for new or enhanced open space, or which would result in open space that is inappropriate in type, quality or location, will be resisted.

Reasoned Justification

5.45 Harrow's Open Space, Sport and Recreation Study (2011) highlights substantial open space deficiencies when recommended standards of provision are applied to the existing and projected future population of the Borough. The total deficiency across the Borough equated to 117 hectares of land in 2010, rising to 139 hectares in 2026. It also identifies some significant gaps in the accessibility of some types of open space and identifies existing facilities in need of qualitative improvement to increase their value and capacity. For this reason Harrow's Core Strategy seeks the provision of new open space as part of major development proposals.

5.46 New residential development results in increased pressure upon existing open space, but also offers the opportunity to provide new open space or secure enhancements to existing facilities that can benefit future occupiers and the wider community. An intelligent approach will be needed to ensure that development delivers open space provision or enhancements that address identified needs. For example the provision of new parks or amenity greenspace in areas with good access to these typologies serves no purpose, and it may instead be more effective to make qualitative improvements to existing parks which support increased use, or focus on increasing the provision of other typologies for which there is a substantial shortfall in the area. Regard will also be had to the quantitative standards of provision recommended in the Study and these are reproduced below. In the event that the Open Space, Sport and Recreation Study is revised or replaced, this will be made available on the Council's website and any resulting new standards will be applied.

Harrow Open Space, Sport and Recreation Study (2011) Recommended Standards of Provision

Typology	Quantity	Quality	Accessibility
Parks and Gardens	0.66 hectare per 1,000 population	81.5%	1,200 metres to a district park
			800 metres to a local park
			400 metres to a small open space

Typology	Quantity	Quality	Accessibility
			400 metres to a pocket park
Children and Young People's Play	4m ² playable space per child	79%	800 metres to a youth space
	At least three youth spaces per sub area		400 metres to local and neighbourhood playable spaces
			100 metres to a doorstep play space
Amenity Greenspace	0.31 hectare per 1,000 population	83.8%	400 metres to a >0.1 hectare amenity greenspace
Natural and Semi-Natural Greenspace	0.4 hectare per 1,000 population (except north-east sub area)	72.5%	1,000 metres to an accessible natural/semi natural greenspace
	1.0 hectare local nature reserve per 1,000 population		
Outdoor Sport	0.78 hectare playing pitch per 1,000 population	see below*	15 minutes to a sports pitch
			15 minutes to a synthetic turf pitch
			15 minutes to multi use games areas and tennis courts
			15 minutes to bowling greens
Allotments	0.18 hectare per 1,000 population	77.1%	1,200 metres to a 51+ plot allotment site
			900 metres to a 21-50 plot allotment site
			600 metres to a -20 plot allotment site

*The recommended minimum quality standards for sports pitches are: 71% for football, 84% for cricket and 71% for rugby. The recommended minimum quality standard for bowling greens is 81.5% and for tennis courts is 87.5%. Changing facilities should achieve at least 63% with the provision of women's facilities a priority. All new grass pitches and bowling green should meet the Performance Quality Standard.

5.47 Where major new open space is being provided it should contribute positively to Harrow's Green Grid either by delivering components already identified or, in the case of unforeseen additions, exploiting the opportunity to further extend and link-up the Borough's network of green infrastructure. This may be particularly pertinent to the provision of new linear parks and green corridors, both additional elements that are identified as generating open space requirements in the Open Space, Sport and Recreation Study (2011) but for which it is not appropriate to set a standard for new provision.

5.48 In town centre locations it may be more appropriate to provide new civic space as an alternative to on-site provision of green open space, or as part of the package of open space requirements identified by this policy. The provision of civic space will also be relevant for major retail and leisure developments. Civic spaces should be of a design and layout that makes them attractive and functional to Harrow's diverse communities. Consideration should be given to the provision of public conveniences and other ancillary facilities, public art, the need to foster safety and security within and about the space, and the desirability of managing long term maintenance liability.

5.49 In view of the findings of the Open Space, Sport and Recreation Study (2011) the Council attaches great importance to ensuring that the open space needs of the Borough's growing population are met and that, wherever possible, existing shortcomings are addressed. Proposals that do not make sufficient provision for new open space, including the wrong type of provision or space that does not meet quality expectations, will be resisted. Similarly proposals that exacerbate existing deficiencies or which squander opportunities to address existing deficiencies will not be accepted.

THE NATURAL ENVIRONMENT

5.50 Sites that are protected for their semi-natural characteristics, open spaces and suburban gardens support the co-existence of a diverse range of habitats and species that contribute to the natural environment and quality of life in Harrow. The National Planning Policy Framework (2012) establishes a set of principles for conserving and enhancing biodiversity when determining planning applications⁽⁶⁰⁾. Policy 7.19 of the London Plan (2011) gives effect to the London-wide Biodiversity Action Plan and requires development proposals to make a positive contribution to the protection, enhancement, creation and management of biodiversity. Together with the policies in this plan and the provisions of Harrow's Biodiversity Action Plan (2008) and the green grid, development over the plan period is expected to safeguard and improve the Borough's biodiversity for future generations.

Policy 27

Protection of Biodiversity and Access to Nature

- A. Proposals that would be detrimental to locally important biodiversity or that would increase local deficiencies in access to nature will be resisted. Regard will be had to any relevant provisions in the Harrow Biodiversity Action Plan.
- B. The design and layout of new development should retain and enhance any significant existing features of biodiversity value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on site or through contributions towards the implementation of relevant projects in Harrow's Biodiversity Action Plan.
- C. Green corridors and green chains will be retained. Proposals that would prejudice their function as routes for the passage of wildlife through the urban environment will be resisted.

60 Paragraph 118.

Reasoned Justification

5.51 There are two Sites of Special Scientific Interest in the Borough and many other sites are identified as Sites of Importance for Nature Conservation. These are shown on the Harrow adopted policies map. Sites of Special Scientific Interest are statutory designations and therefore benefit from the protection provided by legislation. Sites of Importance for Nature Conservation Area are identified by the Greater London Authority and classified in accordance with their importance⁽⁶¹⁾. These are also shown on the adopted policies map. However, biodiversity encompasses all habitats and species present in the environment. Harrow's Biodiversity Action Plan identifies those habitats and species which are particularly important to the Borough's biodiversity; these include:

- bare ground habitats;
- decaying timber habitats;
- gardens and allotments;
- grasslands;
- heathlands;
- parks;
- standing and running water habitats
- wasteland habitats;
- woodlands;
- bats;
- the heath spotted orchid;
- reptiles and amphibians; and
- southern wood ants.

5.52 Threats to Harrow's locally important biodiversity include increased recreational pressure, air pollution, climate change, development, fragmentation, water use and vandalism. The Core Strategy and other development management policies provide the spatial strategy and controls to mitigate many of these threats. This policy seeks to protect locally important biodiversity from the direct, adverse impacts of development proposals.

5.53 Access to the natural environment is a significant component of the quality of life in outer London for many people. Even modest components such as trees and ponds provide opportunities for people to experience nature as part of their home or working environment and enable the integration of biodiversity throughout Harrow, rather than being confined to sites that are formally designated for nature conservation. Wherever possible the design and layout of development should enable any significant existing features on the site to be retained. However it is recognised that biodiversity is only one of a number of considerations that will influence the design and layout of a scheme and that some loss of existing features may be unavoidable. Where the Council accepts that the loss of an existing feature is unavoidable, having regard to its significance to local biodiversity and the importance of other design and layout considerations, suitable replacement provision will be sought. To avoid fragmentation of habitats and restore the biodiversity of the site following the development, replacement provision should be made on the site. Where, exceptionally, this is not possible the Council will seek contributions towards the implementation of projects in the Harrow Biodiversity Action Plan to mitigate the on-site loss of significant features.

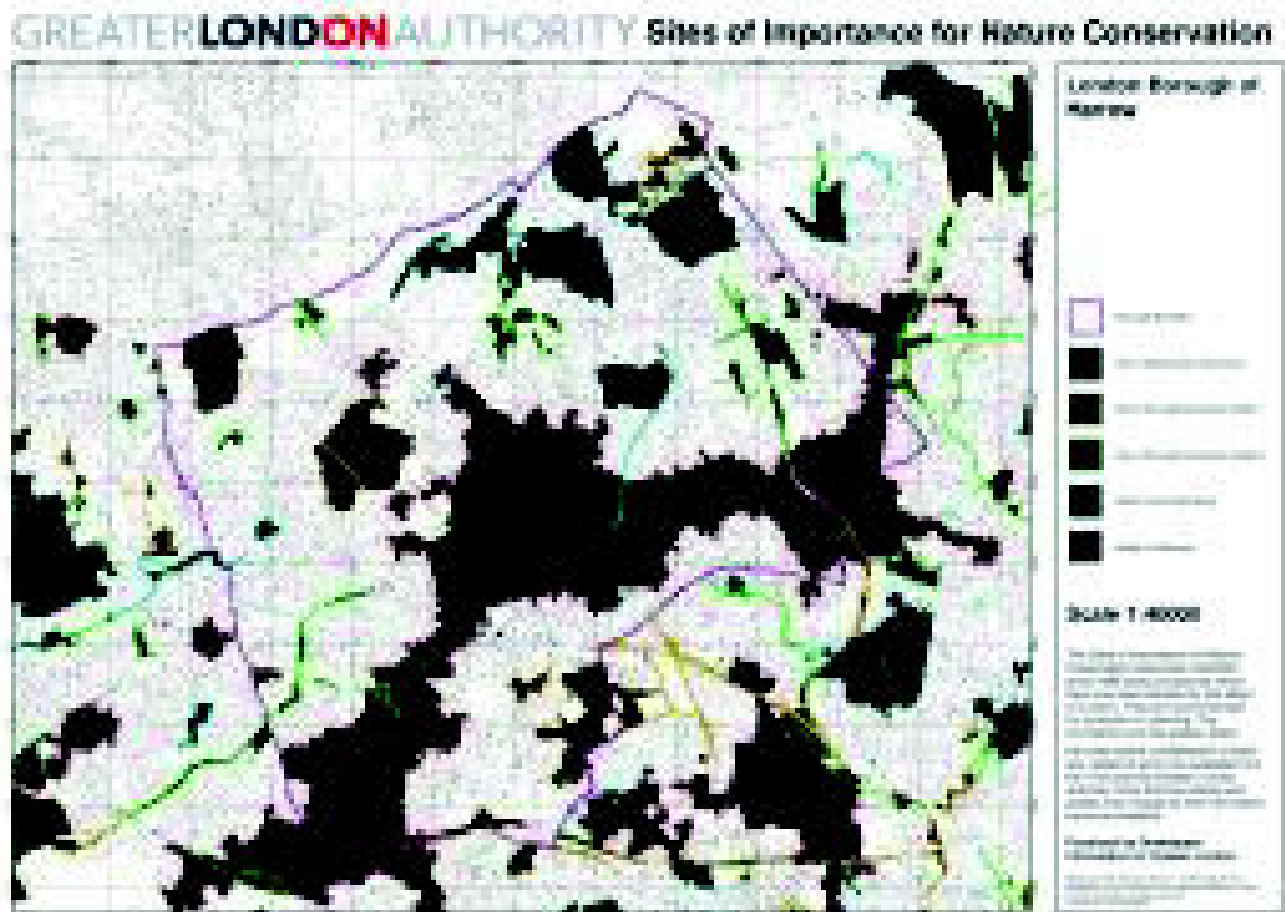
61 The classifications are: Sites of Metropolitan Importance, Sites of Borough Importance Grade I, Sites of Borough Importance Grade II and Sites of Local Importance.

5.54 Areas of deficiency in access to nature is mapped by Greenspace Information for Greater London on behalf of the Greater London Authority (GLA). The areas of deficiency are defined as those of more than one kilometre walking distance from an accessible Metropolitan or Borough Site of Importance for Nature Conservation. Within these areas of deficiency, public access to Local Sites of Importance for Nature Conservation and significant non-designated biodiversity features are likely to be of heightened value to residents. Proposals that would exacerbate areas of deficiency in access to nature will be resisted.

5.55 Green corridors are linear features that serve as wildlife corridors but may not have public access (most notable in the case of railway embankments). Green chains are linked open spaces that follow rivers or other linear features and which do provide public access. Green corridors and green chains are important components of the Borough's green infrastructure with particular value for nature conservation which, together with suburban gardens, mitigate the fragmented distribution of open spaces by enabling the movement of wildlife within and beyond the Borough. Recognising this importance, and subject to the operational requirements of public transport operators in relation to railway embankments, proposals that would prejudice wildlife movement along green corridors and green chains will be resisted.

5.56 [insert map here of Green Chains and Green Corridors]

Picture 5.1



Policy 28

Enhancement of Biodiversity and Access to Nature

- A. Opportunities to enhance locally important habitats and to support locally important species will be sought in accordance with the Harrow Biodiversity Action Plan. Where possible, proposals should secure the restoration and re-creation of significant components of the natural environment as part of the design and layout of development. Particular attention will be paid to:
- a. river corridors, including the potential to deculvert sections and enhance wildlife value;
 - b. green corridors and chains, including the potential to extend or add to the network;
 - c. gardens, including planting for wildlife, green roofs and green walls;
 - d. landscaping, including trees, hedgerows of historical or ecological importance and ponds;
 - e. allotments; and
 - f. habitat creation, such as nesting and roosting boxes, especially when replacing an old building that provided certain habitats.
- B. In areas identified as deficient in access to nature, a high priority will be afforded to opportunities to enhance access through on-site provision or contributions to the implementation of relevant Green Grid projects.

Reasoned Justification

5.57 For each of the locally important habitats and species identified in the Harrow Biodiversity Action Plan there are a range of targets and actions aimed at the on-going protection of the habitat or species, to reverse deterioration where declining conditions have been identified, and to use interventions to enhance conditions where this is appropriate. Consistent with the principles of sustainable development, the Biodiversity Action Plan seeks to ensure that future residents continue to benefit from the Borough's biodiversity.

5.58 New development can provide opportunities to enhance biodiversity. Many of the Borough's natural watercourses were culverted in the 1920s and 1930s and, as previously developed sites come forward for redevelopment, deculverting will not only help to restore natural flood mechanisms but may also provide the opportunity to restore the biodiversity value of the watercourse. Attention to water quality, the environment of the watercourse and planting will be needed to maximise the biodiversity benefits of deculverting. Major proposals may provide the opportunity to extend part of a green corridor or green chain, or to add to the network by linking currently disconnected open spaces.

5.59 In residential development, gardens provide the opportunities for new habitats to form and help to increase the permeability of the urban environment to wildlife. Residential layouts which cluster private gardens to create larger spaces encourage householder tree planting by mitigating concerns about potential subsidence and loss of light. Sensitive landscaping of communal gardens provided as part of flatted development can support wildlife and the creation of new habitats. In town centres and any other location where traditional garden amenity spaces may not be appropriate, rooftop gardens and adequately sized balconies will provide residents with opportunities to plant for nature, whilst the creation of new habitats as part of proposals incorporating green

roofs and green walls will be particularly valuable in areas where there are few opportunities to increase access to nature. Larger residential and commercial developments should incorporate planting for biodiversity as part of a comprehensive landscaping scheme incorporating trees planting, new hedgerows or the formation of ponds. The Hedgerow Regulations 1997 protects important hedgerows of historical and ecological importance.

5.60 Harrow's PPG 17 Sport, Recreation and Open Space Study (2011) highlighted existing and projected future shortfalls across a range of typologies of open space including allotments. The Borough's Biodiversity Action Plan identifies allotments as a locally important allotment. Opportunities to improve existing allotments or increase supply should be fully exploited not only as a valuable human resource, but also for their potential to create accessible natural environments.

5.61 All of the above measures will contribute to the restoration and recreation of natural habitats on development sites and should inform the design and layout of major new development. Where it is not possible to restore or recreate significant components of the natural environment, and as a simple measure for non major development proposals, the installation of artificial habitats such as nesting and roosting boxes should be considered. The combination of more substantial enhancements as part of major development and many incremental improvements by small-scale developers and householders will ensure a valuable environmental legacy for future residents.

5.62 Harrow's Green Grid will form a part of the London wide integrated network of green infrastructure. A network of accessible open spaces linked by footpaths, cycleway and tree-lined avenues is planned. The more built-up character of many of the areas identified as being deficient in access to nature make the reduction of deficiency all the more challenging. Projects that improve accessibility to nature, through on-site provision or funding towards the implementation of Green Grid projects, will therefore be afforded a high priority in areas deficient in access to nature.

Policy 29

Pinner Chalk Mines

- A. Proposals that enhance the environment and appreciation of Pinner Chalk Mines will be supported.

5.63 Chalk was mined for agricultural use in the area around Pinner from the 14th Century onwards. The regionally important geological site at Montesole Playing Fields, Pinner, relates to chalk mine workings that took place between 1830 and 1870 and is one of the deepest in London, at 35m depth⁽⁶²⁾. London Plan Policy 7.20 affords protection to regionally important geological sites and the location of Pinner Chalk Mine within public open space has ensured its continued survival from direct development impacts. Robust, specialist evidence should therefore be used to consider the vulnerability of the geological feature to development on the application site and to identify any potential impacts. The design and layout of the proposal should be clearly informed by the findings of this evidence and include details of methods for the protection of the feature during construction.

62 London's Foundations: protecting the biodiversity of the capital (GLA, 2009).

5.64 The assessment of Pinner Chalk Mine included in *London's Foundations: protecting the geodiversity of the capital* (GLA, 2009) reports that the mine galleries are accessible and in good condition, but highlights concerns regarding the condition of access to the mine shaft and the on-going risk of vandalism. Whilst general public access into the Mine would be inappropriate, there is potential to increase appreciation of this geological asset with interpretation facilities and to improve the conditions for controlled access to the Mine for research and educational purposes. Proposals that enhance the environment of the mine access and enable increased appreciation of its significance will therefore be supported.

Policy 30

Trees and Landscaping

- A. The design and layout of development on sites where there are existing trees should secure the retention and survival of any trees the subject of tree preservation orders and others of significant amenity value. Proposals that would lead to the unnecessary removal of any trees the subject of tree preservation orders and others of significant amenity value, or which would prejudice their survival, will be resisted.
- B. The design and layout of development should make provision for a scheme of hard and soft landscaping, including details of any boundary treatment, appropriate to the character of the area and which supports biodiversity. Proposals that leave insufficient space for an appropriate scheme of landscaping will be resisted.
- C. Proposals for works to trees in conservation areas and those the subject of tree preservation orders will be permitted where the works do not risk compromising the amenity value or survival of the tree. There will be a presumption against the removal of trees the subject of tree preservation orders and those in conservation areas that contribute positively to the character of the area.
- D. The Council will require trees identified for retention to be protected during construction and to be retained or replaced where necessary following the completion of the development.

Reasoned Justification

5.65 Trees and landscaping make a substantial positive contribution to the character of Harrow and are a significant component of the Borough's natural environment. Veteran trees are given specific protection by tree preservation areas and, together with trees in conservation areas, are subject to special controls. Wooded areas, street trees, individual or groups of garden trees and those in open spaces may still be of significant amenity value even if they do not merit the formal protection of a tree preservation order. The Council is preparing a tree strategy to safeguard and manage tree stock within the public realm. The retention of good quality trees on proposal sites can help to integrate new development into the area, preserve local character and achieve sustainability benefits such as natural summer shading. However not all existing trees are worthy of retention and, in some instances, it may be more appropriate to include replacement or new tree planting as part of a development's comprehensive landscaping scheme.

5.66 Proposals for development on sites where there are existing trees must be accompanied by a tree survey to accurately plot the location of the trees and to label those that would be retained and those that it is intended to remove. The survey should be proportionate to the scale of the proposal and the significance of the trees affected. Proposals for householder development on sites with non-protected trees need only plot and label the trees on the site or floor plans. Major development proposals, or those affecting trees the subject of a tree preservation order (including any on adjacent sites), should be accompanied by a more comprehensive survey detailing:

- any relevant site characteristics (such as levels);
- the location, height, spread, health and age of trees; and
- the species and amenity value of trees.

5.67 By identifying which trees are worthy of retention, the site survey should be used to inform the design and layout of development. This will comprise the location of buildings on the site, avoiding damage to roots and canopy, but also consideration of the impact of retained trees on the end-user of the development. This will be particularly relevant to residential schemes which can lead to subsequent pressure for works to, or the complete removal of, retained trees where inadequate attention has been paid to the living conditions of future occupiers. The potential impact of leaf fall and other material from trees upon parking areas and walking surfaces should also be considered.

5.68 For trees are to be retained, further details will be required to demonstrate that the retained tree will be properly protected during construction including, where appropriate, details of site excavations for below ground services. The retention of significant trees and their protection from the effects of construction will be secured as a condition of planning permission. Proposals involving the unnecessary removal of valued trees, or which are likely to prejudice their survival during construction or after the development is occupied, will be resisted.

5.69 All development includes landscaping. Whether it is the treatment of hard surfaces around higher-density town centre buildings, or comprehensive planting schemes in more traditional suburban settings, landscaping is a valuable part of the public and private realm and will influence visitors' first impressions of a development. Consideration should be given to the context and setting of the site in determining the appropriate approach to landscaping, and the resulting requirements should (in addition to the tree survey) inform the design and layout of the proposal. There should be sufficient space on the site, after the buildings, parking areas and ancillary development, for an appropriate scheme of landscaping; this will in turn be influenced by the pattern and character of development in the area and, in the case of residential development, requirements for amenity space. Major development proposals will be expected to submit a scheme of landscaping with the planning application, to an appropriate level of detail, to demonstrate the relationship between landscaping, buildings and spaces. Acceptable proposals for minor development will be required to submit details of landscaping as a condition of planning permission.

5.70 Landscaping schemes should include details of the boundary treatment to be used. The choice of boundary treatment should be appropriate to the function that it is required to perform and the character of the area.

5.71 Trees the subject of tree preservation orders, and those within conservation areas, are the subject of special controls requiring the approval of the Council for certain works and for removal. The need for routine works and maintenance to these 'protected' trees is recognised, but such works should preserve rather than compromise the tree's amenity value and survival. There Council will resist the removal of trees the subject of tree preservation orders and those in conservation

areas that contribute positively to the character of the area. The replacement of protected trees that reach the end of their life, or those that are wilfully removed or damaged, will normally be required.

Policy 31

Streetside Greenness and Forecourt Greenery

- A. Proposals for the provision of substantial hardsurfacing of forecourts and front gardens should respect the character of the area and will be required to use permeable surfacing and, where appropriate, incorporate a scheme of soft landscaping.
- B. The Council will undertake and encourage new planting of street trees and shrubs, by legal agreement if necessary, and provide, restore and/or maintain grass verges on public and private streets
- C. Proposals that fail to make appropriate provision for hard and soft landscaping of forecourts, or which fail to contribute to streetside greenery where required, will be refused.

Reasoned Justification

5.72 Harrow is characterised by its extensive tree and shrub cover, and the amount of streetside greenness and forecourt greenery is an important determinant of this character. Because of this, the Council wishes to protect and enhance the part played by these features in both the local and overall environment. Attractive, well-landscaped and maintained front gardens contrast with forecourts that have been hard-surfaced, where no attempt has been made to soften the effects on the immediate environment. The Council will therefore encourage sympathetic and sensitive treatment of forecourt areas and front gardens. In considering proposals for new development and changes of use, Policy 1 will apply to ensure that appropriate landscaping makes a positive contribution to local character.

5.73 The use of non permeable surfacing impacts upon the ability of the environment to absorb surface water, and the hardsurfacing of front gardens and forecourts can lead to localised surface water flooding. For this reason, and to support the objectives of the Borough's Surface Water Management Plan (2012), the Council will require any substantial hardsurfacing to be permeable, and the incorporation of soft landscaping to help deal with water runoff will be encouraged in areas where this would contribute positively to the character of the area. Substantial areas of hardsurfacing are typically more than 5 square metres, as allowed for in the Town and Country Planning (General Permitted Development) Order 1995 (as amended).

5.74 There are large numbers of grass verges and street trees in the Borough, which make a positive contribution to the environmental character of residential areas. The Council considers that the amount and quality of street trees and shrubs should be retained and enhanced as this forms an integral part of the overall street greenness. These green areas can add to a significant area of wildlife habitat. On some housing estates, grass verges constitute large areas of incidental open space, which contribute significantly to the area's character. In exceptional circumstances,

where the current use of an informal open space is detrimental to the local environment, for instance when unauthorised parking occurs, the Council will aim to secure improvements, e.g. through the provision of landscaping or additional parking facilities, where appropriate.

HOUSING 6

Development Management Policies Pre-Submission DPD

6 HOUSING

INTRODUCTION

6.1 The National Planning Policy Framework (2012) requires local planning authorities to plan for housing to meet projected needs, identify the mix of housing required and, where affordable housing is needed, to set policies to meet that need in a way that contributes to the objective of creating mixed and balanced communities⁽⁶³⁾. The London Plan (2011) provides the strategic planning framework for reconciling requirements for, and the capacity to deliver, housing across London. The London Plan contains a number of housing policies with decision making provisions that *inter alia* require proposals to:

- optimise housing output having regard to the London sustainable residential quality matrix (Policy 3.4 *Optimising Housing Potential*);
- enhance the quality of places and reflect minimum space standards (Policy 3.5 *Quality and Design of Housing Developments*);
- make provision for play and informal recreation (Policy 3.6 *Children and Young People's Play and Informal Recreation Facilities*);
- offer a range of housing choices, in terms of size and type, achieve Lifetime Homes standards and ten per cent designed to be wheelchair accessible, and address the accommodation requirements of gypsies and travellers (Policy 3.8 *Housing Choice*);
- secure the maximum reasonable amount of affordable housing (Policy 3.12 *Negotiating Housing on Individual Private Residential and Mixed Use Schemes*) on development sites with the capacity to provide 10 or more homes (Policy 3.13 *Affordable Housing Thresholds*); and
- resist the net loss of housing and promote efficient use of existing stock (Policy 3.14 *Existing Housing*).

6.2 Harrow's Core Strategy (2012) requires the delivery of a minimum of 3,250 new homes on previously-developed land throughout the Borough (excluding the Harrow & Wealdstone Intensification Area⁽⁶⁴⁾) over the period 2009/10 to 2025/26. Policy CS1(J) establishes a Borough-wide, affordable housing target of 40% from all sources of supply and, consistent with the London Plan, seeks the maximum reasonable amount of affordable housing on development sites with a capacity to provide ten a more homes, having regard to a range of considerations. The Core Strategy also sets out the Council's strategic expectations on local character, open space, residential quality and inclusivity, transport, sustainability, waste and infrastructure.

6.3 Criteria for new and replacement Gypsy and Traveller sites are set out at Core Strategy Policy CS1(Y).

6.4 The housing policies in this chapter supplement those in the London Plan and the relevant provisions of the Harrow Core Strategy by amplifying Harrow's local residential development requirements for sites outside of the Harrow & Wealdstone Intensification Area. In addition, the Council is preparing the following strategies:

63 Paragraph 50.

64 A separate target of 2,800 homes applies to the Harrow & Wealdstone Intensification Area. Policies for the Intensification Area are set out in the Harrow & Wealdstone Area Action Plan.

- Housing Strategy: to [check with housing]
- Tenancy Strategy: To set out the Council's approach to flexible tenancies and the principles that social landlords will be expected to apply when preparing their own tenancy policies. The intention of the strategy is to achieve a consistent approach across all providers so that tenants can enjoy the same housing offer in Harrow regardless of landlord. The strategy also incorporates the Council's statement on affordable rents and policy on affordable rent development.

6.5 These strategies will also be taken into account when considering development proposals that are to include affordable housing.

Housing Mix

Policy 32

Housing Mix

- A. Proposals that secure an appropriate mix of housing and which contribute to the creation of inclusive and mixed communities will be supported. The appropriate mix of housing will be determined having regard to:
 - a. the target mix for affordable housing, set out in the Council's Planning Obligations supplementary planning document;
 - b. the priority to be afforded to the delivery of family housing; and
 - c. the location of the site, the character of its surroundings and the need to optimise housing output on previously-developed land.
- B. Proposals that would fail to achieve an appropriate housing mix, or which would fail to contribute to the creation of inclusive and mixed communities, will be refused.

Reasoned Justification

6.6 The Council is committed to achieving a mix of market and affordable housing that both meets the needs of residents and contributes to the creation of sustainable communities. For the purposes of applying this policy, consideration of the mix will comprise:

- unit size, expressed as number of bedrooms and persons;
- unit type, expressed as studios, flats and houses; and
- the tenure split of affordable housing, expressed as social rent, affordable rent, intermediate or other recognised product.

6.7 Sustainable communities are those that are inclusive to everyone and are appropriately mixed in terms of demographics, household types and tenure. The creation of inclusive and mixed communities supports the formation of links between individuals and groups that in turn contributes to wellbeing and social integration. Consideration will therefore also be given to the contribution that proposals make to the creation of inclusive and mixed communities.

6.8 In determining the appropriate mix of housing to be achieved on development sites, regard will be had to:

- **the target mix for affordable housing, set out in the Council's Planning Obligations supplementary planning document;**

6.9 Notwithstanding the introduction of powers to establish a local community infrastructure levy, the provision of affordable housing remains a matter to be dealt with through Planning Obligations. The Council intends to prepare a Planning Obligations supplementary planning document which will include details of the target affordable housing mix to be sought as part of private residential development schemes. The target mix will be informed by the Council's Housing Strategy and will be updated, from time to time over the plan period, to respond to any change in needs that may occur.

- **the priority to be afforded to the delivery of family housing;** and

6.10 The London Plan (2011) defines family housing as homes comprising three or more bedrooms and attributes a strategic priority to the delivery of affordable family housing⁽⁶⁵⁾. This priority is reflected in Harrow's local target mix for affordable housing. The West London Strategic Market Housing Assessment (2010) identifies a five year requirement for 2 bedroom and 4+ bedroom market-tenure homes⁽⁶⁶⁾. Monitoring shows that whilst the development industry is effective in the delivery new 2 bedroom market homes in the Borough, particularly as part of flatted developments, the supply of 4+ bedroom market homes has been less forthcoming. [check with will]. Recognising that the market will continue to respond to the need for 2 bedroom and other smaller homes, the Council will attach a priority to the delivery of family sized, market homes on sites that are best suited to meet this need.

- **the location of the site, the character of its surroundings and the need to optimise housing output on previously-developed land.**

6.11 Policy 3.4 of the London Plan (2011) requires proposals to optimise housing output within the location classifications set out in the sustainable residential quality density matrix and taking into account local context, character, design and public transport capacity. The Council considers that this approach should also inform the appropriate housing mix. The public transport accessibility of a site will in many instances be fixed by its location⁽⁶⁷⁾ and so this, along with the location classification⁽⁶⁸⁾, will determine the density range to be used. However the density range should be the starting point, not the end, when considering the appropriate housing mix. The location of the site and the character of its surroundings should be considered to deliver common sense outcomes. For example higher density, mixed use development in town centre locations may be more suited to smaller households whilst lower density development in suburban locations is generally suited to family housing. This should

65 Policy 3.8 *Housing Choice* and Policy 3.11 *Affordable Housing Targets*.

66 See Figure 97 *Borough Level 5-year Housing Requirement by Housing Type and Size for Minimum Draft Replacement London Plan Delivery*, West London Strategic Housing Market Assessment (2010)

67 Unless investment to improve the public transport accessibility rating is required to enable the development - see Policy CS1 S.

68 As either suburban, urban or central as defined in the London Plan sustainable residential quality density matrix. However the reasoned justification to London Plan Policy 3.4 is clear that the density ranges should not be applied mechanistically.

not be interpreted as meaning that schemes solely comprising one and two bedroom units in town centres will be acceptable, nor that schemes including smaller units on more suburban sites will be unacceptable. Recognising that not all families will want to live in suburban locations and not all smaller households will want to live in town centres, and the importance of creating inclusive and mixed communities, individual proposals should aim to provide a mix of all types of units but the mix should be skewed to suit the location of the site and the character of the surroundings.

6.12 Proposals that would fail to achieve an appropriate housing mix, or which would fail to contribute to the creation of inclusive and mixed communities, will be refused.

Conversions

Office Conversions

The Council will manage the Borough's supply of office space in accordance with the objectives of Core Strategy policy CS1. Where offices are found to be redundant, the whole-scale demolition and redevelopment of these office buildings will be supported. Where this is not feasible, the conversion of offices to residential will be supported where:

A The conversion of offices provide cladding that is suitable to a residential building and in keeping with the character of the area.

B Balconies and/or amenity space are designed into the development as integral facilities and the creation of well designed public realm and landscaping is demonstrated

C Any additional functional features that are needed such as as pipes, flues or communications equipment are grouped together and routed through existing features where possible, and kept off publicly visible elevations.

D Proposed apartments should wherever possible be dual aspect. A sole aspect apartment into a parking court or other shared use rear area will generally be unacceptable.

All conversions will be expected to meet design criteria in policy 1, and to accord with the London Plan's minimum space and lifetime homes standards.

Reasoned Justification

6.13 It is the Council's preference that redundant offices are comprehensively redeveloped to provide bespoke residential accommodations to help meet the Borough's housing need, whilst providing the right type and tenure of property . Where this is not feasible or viable, proposals for office conversions should ensure that the design, including cladding, landscaping and amenity space is of exceptional quality, and does not look incongruous with its surroundings. Particular attention should be given to ensuring that any additions made necessary to the building as a result of the conversion do not detract from the scheme, and are appropriately integrated.

Policy 33

Conversion of Houses

- A. The conversion of houses to multiple units will be supported having regard to:
- a. the adequacy of the internal layout in relation to the living conditions of future occupiers and any impact upon neighbouring occupiers;
 - b. the adequacy of amenity space provision for future occupiers;
 - c. the contribution that the proposal would make to the delivery of accessible homes;
 - d. the impact of the proposal upon the appearance of the property, the character of the area and the amenity of neighbouring occupiers;
 - e. the adequacy of parking, access and refuse/recycling storage arrangements.
- B. Proposals that would lead to an over-intensive conversion, or which would compromise any component of this policy, will be refused.

Reasoned Justification

6.14 Whilst making sufficient provision to meet the Borough's housing needs on identified, previously-developed sites, Harrow's Core Strategy (2012) recognises that conversions and other appropriate windfall development will continue to make a contribution to housing supply in the Borough. In so doing, they provide both a contingency on delivery against the Borough's strategic housing target and a means of exceeding the housing target, which is expressed as a minimum to reflect on-going demand pressures in Harrow and London as a whole. They may also help to address the current imbalance in the supply of market housing between 3 bedroom homes (in surplus) and 2 bedroom homes (in deficit) as identified in the West London Strategic Housing Market Assessment (2010).

6.15 For the avoidance of doubt, this policy applies to all proposals for the conversion of housing into multiple dwellings including smaller dwellinghouses, flats and studio accommodation⁽⁶⁹⁾. It will also apply to proposals for alterations to, or the further subdivision of, dwellings that have already been converted.

6.16 Policy ~~XX~~*Housing Mix* (above) will be applied to conversion proposals and may become particularly relevant where: (i) monitoring shows that further conversions of certain types of housing would materially exacerbate a shortfall in the supply of that type of housing; and (ii) where further conversions in the location proposed would be at odds with the creation of inclusive and mixed communities. Where the conversion of an existing house to several dwellings is acceptable, and subject to the components of this policy not being compromised as a result, the Council will expect the conversion to achieve an appropriate mix of homes in accordance with Policy XX.

6.17 The conversion of houses to multiple units will be supported having regard to:

- **the adequacy of the internal layout in relation to the needs of future occupiers and any impact upon neighbouring occupiers;**

69 Policy ~~XX~~ applies to large houses in multiple occupation.

6.18 London Plan Policy 3.5 *Quality and Design of Housing Developments* seeks to ensure that residential proposals reflect minimum space standards for new development ⁽⁷⁰⁾ and have adequately sized rooms and convenient and efficient room layouts. The Council will apply this London Plan policy, including the minimum space standards, to conversion proposals. Whilst recognising the constraints of existing building envelopes and the desirability of retaining existing internal walls wherever possible, the internal layout of conversion proposals should achieve acceptable living conditions for future occupiers of the dwelling being created and minimise impacts upon the future occupiers of other dwellings being created within the conversion proposal, as well as those upon occupiers of neighbouring properties.

6.19 Internal noise transference can lead to disturbance and poor levels of privacy between dwellings. Requirements for sound insulation are properly addressed through the Building Regulations and it is inappropriate to seek to replicate these controls through the planning process. However, sensitive arrangement of rooms within a conversion will enhance the effectiveness of sound insulation by avoiding conflict between noise-sensitive and other room uses. Proposals for flat conversions should ensure that the stacking of room uses within the building secures the separation of bedrooms and more noisy room uses, particularly living rooms and kitchens, between the flats. A non-conflicting horizontal relationship between the room uses of proposed flats and those of adjoining dwellings is frequently more difficult to achieve but should nevertheless be avoided wherever possible.

6.20 The Council does not wish to prescribe minimum dimensions for rooms, but will seek to ensure that rooms are practical and fit for their intended purpose. Rooms should therefore be of a size and shape to accommodate the reasonable furniture and storage needs of the likely future occupiers of the dwelling, with adequate circulation space.

6.21 The internal layout should ensure that all habitable rooms have a satisfactory environment in terms of daylight, outlook and noise. Consideration will be given to the impact of the external environment upon habitable rooms, particularly in relation to the conversion of maisonettes above commercial premises where air conditioning units, extract and similar equipment may adversely affect living the living conditions of future occupiers.

- **the adequacy of amenity space provision for future occupiers;**

6.22 As with new-build residential development, the Council expects conversion proposals to make adequate amenity space provision for future occupiers of the dwellings being created. In most situations ⁽⁷¹⁾ a subdivision of the existing garden to provide a private amenity space for each of the dwellings being created will be the most desirable solution for future occupiers and in terms of on-going maintenance. To achieve this, proposals should make provision for future occupiers of each dwelling to access its allocated garden area within the site boundary. In most existing residential areas external stairs from proposed upper floor flats to the garden, or the provision of balconies as an alternative form of amenity space to facilitate a conversion proposal, is likely to raise privacy concerns and be unacceptable for that reason. Where amenity space is to be provided communally, the Council will wish to be satisfied before granting planning permission that there would be adequate privacy safeguards for the ground floor occupiers and that there will be robust, sustainable arrangements in place for managing the on-going maintenance responsibilities.

70 Set out at Table 3.3 of the London Plan.

71 Excluding maisonettes above commercial premises and mid-terrace properties.

- **the contribution that the proposal would make to the delivery of accessible homes;**

6.23 London Plan Policy 3.8 *Housing Choice* requires all new housing to be built to 'Lifetime Homes' standards and for ten per cent to be wheelchair accessible. Pursuant to this policy, the Council affords a high priority to the delivery of accessible homes in all new housing proposals. Where feasible, conversion proposals should meet all of the relevant requirements of the Lifetime Homes standards and, where a ground floor flat is being created, that flat should meet the enhanced requirements of the Wheelchair Home standards. Where it is not feasible to meet one or more of the standards necessary to qualify as a Lifetime or Wheelchair Home, the design and layout of a conversion proposal should nevertheless contribute to delivery of accessible homes principles.

- **the impact of the proposal upon the appearance of the property, the character of the area and the amenity of neighbouring occupiers;**

6.24 Any extensions or alterations proposed as part of the conversion should comply with Policy 1 and the Council's Residential Design Guide supplementary planning document. Conversions should preserve the Metroland and suburban appearance of Harrow's residential areas. Insofar as possible, proposals will be required to retain a single (i.e communal) door to the front elevation of the dwelling and an appropriate balance of hard and soft landscaping will be sought on the forecourt. Where the forecourt is already wholly or substantially hardsurfaced, conversion proposals will be used to provide a reasonable opportunity for the restoration of soft landscaping which enhances the property's appearance in the streetscene.

6.25 The conversion of houses to smaller units need not be harmful to local character. Proposals that preserve the appearance of the property and which do not over-intensify its use (see paragraph XX) help to meet housing need within existing residential areas in a way that is consistent with Metroland and suburban character and, in areas with a positive and coherent character, is usually preferable to the demolition and redevelopment of existing dwellings. However, poorly executed and maintained conversions too frequently damage the visual appearance of streetscenes, whilst those resulting in over-intensive use can materially increase the levels of activity and on-street parking associated with the property. Such character impacts may be most keenly felt in streets with historically high conversion rates, where further adverse impacts must be avoided. Proposals should not be detrimental to the appearance, residential and environmental characteristics of the area, and developers are encouraged to ensure that following the completion of a conversion scheme adequate arrangements are put in place to secure the on going care and maintenance of the property.

6.26 In addition to any internal noise impacts, the Council will seek to ensure that conversions do not give rise to levels of external activity that would be detrimental to the amenity of neighbouring occupiers. Again this will in large part be a function of the intensity of use proposed and the relationship of the property to be converted with those surrounding it. The assessment of proposals against the other criteria in this policy will also be informed by amenity impacts; in particular: garden subdivision/amenity space provision; the adequacy of the parking and site access; and the arrangements for refuse storage.

- **the adequacy of parking, access and refuse/recycling storage arrangements.**

6.27 The Council will apply the London Plan maximum parking standards to the assessment of conversion proposals. The provision of on-site car parking should be informed by the need to maintain a balance of hard and soft landscaping and the requirement for a disabled person's

parking bay where one of the converted units is to meet the Wheelchair Home standards. Where there is a useable rear service road this may be used to provide access to additional bays or garaging. However the creation of substantial, surface car parking in rear gardens is unlikely to be compatible with the character of residential areas and the amenity of neighbouring occupiers and will be resisted.

6.28 Proposals must achieve satisfactory access to and within the site, and consideration will be given to the highway safety and amenity impacts of any increased demand for off-street parking. The conversion of properties in narrow cul-de-sacs and those served by private drives serving multiple properties are likely to pose particular challenges. Material increases in the use of existing dangerous or substandard vehicular accesses and highway junctions will be resisted. The specification for inclusive pedestrian access to/from new homes are set out as part of the Lifetime and Wheelchair Home standards.

6.29 Existing and new homes in the Borough are supplied with separate bins for general waste, recycling and composting. The segregation of waste by residents has enabled Harrow to achieve and sustain reductions in the amount of material sent to landfill sites in recent years. However conversions increase the number of bins to be accommodated within the curtilage of an existing dwelling, and where left on the forecourt they can be unsightly and cause obstruction. As part of the subdivision of rear gardens to form private amenity areas for future occupiers, proposals should make provision for bin storage within those amenity areas and a suitable access for them to be wheeled to the forecourt for collection. Where, exceptionally, rear bin storage cannot be achieved there must be adequate space on the forecourt to accommodate the bins and provide suitable screening, in conjunction with other forecourt requirements. The location of bin storage areas should not give rise to nuisance, by reason of potential noise and odour, to future and neighbouring occupiers.

6.30 Due to the relatively modest size of the existing housing stock in Harrow, the creation of self-contained accommodation with the roofspace of dwellings frequently challenges the objectives of conversion policy. Proposals for the creation of accommodation within roofspace, including studio flats, will be subject to the same requirements as other flats forming part of a conversion proposal. In particular:

- When applying the London Plan floorspace standards to proposals for flats in roofspace, the Council will only consider that part of the floorspace for which there would be sufficient headroom for the future occupiers (i.e. space below the eaves will not be counted).
- Habitable rooms in the roof space must have a satisfactory source of outlook. Rooflights that would be located above eye level and therefore would not provide a means of outlook for future occupiers will not be acceptable.
- The layout within the roofspace must achieve a satisfactory stacking of room uses with those of the flat(s) below.

6.31 Harrow's Residential Design Guide and Accessible Homes supplementary planning documents contain further, detailed guidance in relation to conversion proposals. These documents will be a material consideration when applying this conversion policy.

6.32 The appropriate number of units to be provided within a conversion proposal will be determined by the size of the original dwelling together with any proposed extensions⁽⁷²⁾, the application of the London Plan minimum space standards and the Lifetime and Wheelchair Home standards, the availability of amenity space to meet future occupiers' needs, and the adequacy of the internal layout. Experience indicates that the conversion of modest Metroland and other suburban houses to more than two flats frequently compromises one or more policy objectives, whilst some small terraced houses are incapable of being satisfactorily converted. Proposals that would lead to the over-intensive conversion of a property, and those which would compromise any other component of this policy, will be refused.

Amenity Space

Policy 34

Amenity Space

- A. Residential development proposals that provide appropriate amenity space will be supported. The appropriate form and amount of amenity space will be determined having regard to:
 - a. the location and dwelling mix;
 - b. the likely needs of future occupiers of the development;
 - c. the character and pattern of existing development in the area;
 - d. the need to safeguard the privacy and amenity of neighbouring occupiers; and
 - e. the quality of the space proposed.
- B. Major residential development proposals should have regard to the contribution that the design and layout of amenity space can make to the objectives of Harrow's Biodiversity Action Plan and Green Grid.
- C. Proposals that would fail to provide appropriate amenity space will be refused.

Reasoned Justification

6.33 Amenity space is a highly valued component of the residential environment for many people and is an integral part of the quality of life of residents in outer London. Private gardens and communal outdoor amenity spaces provide a setting for buildings, space for landscaping and help to maintain a more natural environment within urban areas for wildlife and surface water drainage. Well designed balconies in town centre locations help to add interest and life to the appearance of a building. As with other forms of open space, amenity space can make a positive contribution to human health and wellbeing.

6.34 The Council will expect all new residential development to provide amenity space for future occupiers. The appropriate form and amount of amenity space will be determined having regard to:

- **the location and dwelling mix;**

72 Which should comply with the Council's Residential Design Guide supplementary planning document.

6.35 Balconies and roof gardens are an appropriate form of amenity space provision for town centre developments, subject to considerations of privacy and amenity in accordance with Policy 1. They are particularly suited to smaller homes in town centre developments. Proposals that include family sized homes in town centre developments should not rely solely on balconies, but should include outdoor landscaped space that can support the reasonable play space requirements⁽⁷³⁾ associated with the projected child yield of the development.

6.36 In more suburban locations, suited to lower density development and family sized homes, amenity space should take the form of more traditional private and communal garden areas.

6.37 Where balconies and roof gardens are provided, consideration will be given to their impact upon the privacy and amenity of all future occupiers of the development, and any neighbouring occupiers, in accordance with Policy 1.

- **the likely needs of future occupiers of the development;**

6.38 Related to the dwelling mix, the form and amount of amenity space should also be informed by the likely needs and expectations of future occupiers. Occupiers of smaller homes in high density, flatted development may have their needs wholly met by a private, usable balcony or roof garden. Small households occupying development in more suburban locations may reasonably expect some access to a moderately sized private garden or a larger, managed communal space. For larger accommodation and particularly houses a private garden commensurate with the needs of family occupiers will be sought. Where amenity space is to be provided communally, the Council will wish to be satisfied before granting planning permission that there would be adequate privacy safeguards for any ground floor occupiers and that there will be robust, sustainable arrangements in place for managing the on-going maintenance responsibilities.

- **the character and pattern of existing development in the area;**

6.39 The pattern of houses and gardens in many of Harrow's Metroland and other suburban areas form an important and positive attribute of residential character and quality. In such locations amenity space for new development should reflect that pattern, consistent with the London Plan sustainable residential quality density matrix, to ensure that the character of buildings and spaces, and the privacy and amenity that these afford to residents, is properly sustained.

- **the need to safeguard the privacy and amenity of neighbouring occupiers; and**

6.40 Related to the character and pattern of development, the prevailing form of amenity space influences the standard of privacy and amenity enjoyed by residents in different locations across the Borough. Amenity space should be used to provide a relationship between proposed development and neighbouring buildings and spaces which preserves the privacy and amenity of neighbouring occupiers to a standard which is appropriate to the area.

- **the quality of the space proposed.**

73 See London Plan Policy 3.6 *Children and Young People's Play and Informal Recreation Facilities*.

6.41 Amenity space, in whatever form, should be fit for purposes. Balconies and roof gardens should have dimensions that enable them to be used for sitting out with sufficient left over circulation space. Similarly traditional gardens, whether private or communal, should be of a size and configuration that enable them to function both as usable space and for landscaping. Narrow, unusable areas and 'left over' strips adjacent to parking areas etc will not be treated as meeting future occupiers' amenity space needs. Balconies, roof gardens and other amenity spaces that would be permanently or substantially in shadow should be avoided.

6.42 Harrow's Biodiversity Action Plan (2008) identifies residential gardens as a habitat of local importance to the Borough. Harrow's Green Grid sets out proposals and projects for linking existing open spaces to form a more integrated approach to green infrastructure across the Borough. Together, retention of residential gardens and the realisation of green grid will support the movement and survival of wildlife through the urban environment. The design and layout of amenity space provided as part of major residential development should have regard to the relevant provisions of these documents and contribute to the delivery of their objectives.

6.43 Having regard to the criteria set out in this policy, proposals that would fail to provide appropriate amenity space will be refused.

Policy 35

Protection of Housing

The Council will resist proposals involving a net loss in the number of residential units including any net loss in the number of affordable housing units.

Reasoned Justification

6.44 The objective of the policy is to ensure that the number of housing units (including affordable units) are protected following new development. Exceptions to the policy will only be supported where it can be demonstrated that there would be an overall benefit to outweigh the net loss in particular circumstances. Such circumstances may involve:

- Where it is not possible to achieve the required quality of provision through redevelopment without a net loss of residential units;
- Where a community facility or other relevant use is incorporated into any redevelopment and where the community facility would not have a consequential impact upon residential amenity;
- Proposals for change of use to another form of housing (guest houses and bed and breakfast accommodation) within the Town and Country Planning (Use Classes) Order 1987 (as amended);

- Where the condition of vacant and derelict residential buildings is in a state of disrepair that they cannot be returned to a habitable standard and redevelopment is justified as the only viable option; and
- Where it can be justified that the land is no longer suitable for the provision of housing having regard to neighbouring land uses.

6.45 With regards to existing sub-standard development compared to proposals which achieves a modern design and layout including internal and amenity space standards, the modest loss of residential will be considered where the benefit of achieving such standards would outweigh the net loss in the overall number of residential units following development. The conversion of HMO properties into bedsits or flats may also potentially result in the loss of net residential accommodation. In these circumstances, such a loss in net residential accommodation will only be considered where the quality of the conversion is of a high quality and meets the housing standards of the Development Plan. The change of use from residential to a community facility may also be considered where the benefit of such a facility outweighs the loss of any residential unit(s).

6.46 The net loss of any residential units will only be acceptable in specific circumstances provided the criteria listed in the policy has been addressed. The effect on the character of the area, impact on the amenity of residents and transport shall also be a material consideration involving any proposals for residential development.

6.47 The Council must provide additional new homes over the Plan period in accordance with the London Plan. Therefore, the retention of existing housing within the Borough and development of new housing is essential to the delivery of housing in line with the housing provision target set by the Mayor of London. The protection and redevelopment of residential development would encourage more people to live in the Borough whilst preventing unacceptable levels of overcrowding.

6.48 It is important to safeguard the existing residential stock, as the need for housing remains. Where residential land or buildings are redeveloped, the Council shall normally insist that existing residential floorspace and the number of units shall be maintained as a minimum. However it is also recognised, particularly in the redevelopment of large estates, that a net loss of housing may occur as a result of an improved residential environment being created. The policy also sets out exceptions for changes of use to other forms of residential accommodation (higher quality, accessible and more sustainable development may result in lower provision for housing).

Policy 36

Children and Young People's Play Facilities

New residential proposals which result in a net increase in child yield will be expected to provide children and young people's play facilities on-site. Where a satisfactory level of children and young people's play facilities provision is not achieved on-site, the Council will seek a financial contribution towards the improvement of existing children and young people play facilities within the local area. Housing developments outside areas deficient in children and young people's outdoor play facilities will still be expected to provide a contribution towards the maintenance and upgrade of existing children and young people play facilities.

Reasoned Justification

6.49 The importance of children's play space is reflected in the number of homes proposed for the Borough, set by targets in the London Plan. Certain areas within the Borough will be more densely populated, particularly within the Harrow and Wealdstone Intensification Area and thereby, potentially impacting on existing children and young people play facilities. Proposals should have regard to the requirements set in the Mayor's Children and Young People's Play and Informal Recreation SPG (2008). Where proposals do not reflect the criteria in the SPG, a contribution will be sought for the maintenance and improvement of existing facilities.

Policy 37

Sheltered Housing, Care Homes and Extra Care Housing

- A. The Council will support proposals for sheltered housing, care homes and extra care housing (across all tenures) for older people and those who may be vulnerable, provided that the proposal is accessible by public transport with good access to local amenities including shops and community facilities.
- B. The loss of care homes or sheltered housing will only be supported where it can be reasonably demonstrated there is no longer a demand for that use on the site.

Reasoned Justification

6.50 The Council will support the development of sheltered housing, care homes, extra care housing and other homes for older people that combine independent living with the availability of support and nursing care. Proposals will have regard to the Council's Core Strategy and Supported Accommodation Strategy (2010) alongside the other relevant policies in this plan. Where existing homes for older people no longer meet contemporary standards, the Council will favourably consider conversion or redevelopment to provide extra care homes. All care homes and sheltered housing shall meet the Council's Lifetime Homes and Wheelchair Accessible Housing requirements.

6.51 For the avoidance of doubt, the Council will apply London Plan affordable housing requirements to proposals for the types of development addressed in this policy. This approach is supported by paragraph 3.51 of the London Plan. The relevant policies are Policy 3.12 *Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes* and Policy 3.13 *Affordable Housing Thresholds*.

Policy 38

Large Houses in Multiple Occupation and Hostels

- A. The Council shall support the provision of Large Houses in Multiple Occupation and Residential Hostels where it can be demonstrated that:
 - a. there is good accessibility to local amenities and public transport;

- b. they accord with Accessible Homes standards and provide satisfactory living conditions for the intended occupiers; and
- c. there will be no adverse impact on the amenity of occupiers of neighbouring properties or the character of the area.

JUSTIFICATION

6.52 Houses in Multiple Occupation (HMOs) are defined in the Town and Country Planning (Use Classes) Order 1987 (as amended) as small shared houses or flats occupied by between three and six unrelated individuals who share basic amenities. Planning permission is not required for a change of use from a (Use Class C3) dwelling house to a HMO (Use Class C4) and vice versa. However, where a material change of use occurs, e.g. where the number of residents has increased to the point where the use has intensified so as to become a different character, the property may constitute a Large HMO, for which planning permission will be required. Hostels fall under the use class *Sui Generis*, where there is no permitted change of use.

6.53 Hostels are classed as *sui generis*. This means that any proposal for a change of use to or from a hostel requires planning permission.

6.54 Large HMOs and hostels can contribute to the overall supply of cheaper accommodation, particularly for young professional people and those on low incomes. However, a proliferation of such forms of accommodation in remote areas with poor access to public transport and basic shops and services are unlikely to meet the needs of future occupiers. It is also important to ensure that large HMOs and hostels provide a standard of accommodation equivalent to that enjoyed by other residents and that the amount of activity generated by the proposed level of occupation does not detract from the amenities of neighbouring occupiers. The Council will therefore apply the criteria for Lifetime Homes to proposals for large HMOs and hostels and will also require that the minimum space standards for development are met in the provision of new large HMOs and hostels. Harrow's Residential Design Guide SPD provides details for these space standards and other relevant criteria for achieving high quality residential development, which will be applicable to new-build and conversion schemes that result in large HMOs and hostels.

6.55 The application of the space standards will help to determine the number of occupiers, which a property can reasonably accommodate as a large HMO or hostel. This not only ensures reasonable living conditions for occupiers, but will also ensure that the intensification of such activity associated with any large HMO or hostel is proportionate to the size of the property. Therefore, this helps to prevent undue disturbance, both internally within the building and associated with the outside space around the building in relation to neighbouring property. Proposals involving large HMOs or hostels will also be required to have regard to the internal layout and sound insulation, where relevant, to ensure that the amenities of neighbouring occupiers will be safeguarded.

EMPLOYMENT AND ECONOMIC DEVELOPMENT 7

Development Management Policies Pre-Submission DPD

7 EMPLOYMENT AND ECONOMIC DEVELOPMENT

INTRODUCTION

7.1 Harrow's location in outer north-west London provides the Borough with good public transport access to central London, other parts of north and west London, and to major centres beyond Greater London including Watford, Milton Keynes and Aylesbury. North-west London is also enveloped by three major components of the south-east's trunk road network - the M1, M24 and M40 motorways - while the neighbouring areas of west London and Hertfordshire are home to Heathrow and Luton airports respectively. Harrow's Local Economic Assessment (2010) portrays the Borough's economy as one with significant numbers of small and medium sized enterprises, and a small but important number of established large employers, covering a wide range of economic activities and no one, dominant sector.

7.2 Whilst geographically well positioned in relation to trunk roads, competitor centres have more direct access to the network and have consequently benefited from associated growth in office park and distribution development in recent years. The resulting formation of sub regional economic nodes have negatively impacted upon demand for Harrow's more traditional town centre office stock and urban industrial land base. Today, Harrow's economy functions primarily to meet local needs but has the potential to benefit from some of the major employment growth areas in north and west London. However Crossrail and the proposed HS2 rail routes both bypass the Borough and are likely to increase competition from other locations.

7.3 Harrow's residents are generally well educated, skilled and enjoy comparatively high household earnings. Consistent with all outer London borough's out-commuting to central and other parts of London is high, but the local economy provides over 80,000 jobs and this is projected to grow by 4,000 over the period to 2026. The projections highlight continuing diversification in the range of local jobs with limited growth and some contraction in traditional industrial and business sectors.

7.4 Enterprising Harrow (2006), the Borough's economic development strategy and action plan, sets out the following key objectives:

- securing inward investment and maintaining current business base;
- tackling skills shortages and employability issues;
- supporting the development of enterprise skills, so local entrepreneurs become local businesses and existing Small to Medium Enterprises are sustained and grow;
- helping local businesses by providing them with technical support, supply chain development and market information;
- making sure businesses have access to the land and premises they need;
- providing a supportive regulatory framework;
- promoting use of local businesses and facilities; and
- promoting tourism.

7.5 Other employment land in the Borough, historically designated for traditional industrial and business activities, falls into three broad categories: Strategic Industrial Locations, Industrial and Business Use Areas, and non-designated sites in use for industrial or business purposes. There are two Strategic Industrial Locations in the Borough: the Wealdstone preferred industrial location and the Honey Pot Lane industrial business park; the extent of these designations is shown on the Harrow proposals map. Strategic Industrial Locations are a London Plan designation designed to identify and safeguard for appropriate uses land which forms part of the capital's reservoir of industrial and business use capacity. Industrial and Business Use Areas are industrial and business use estates which form the central component of the Borough's land supply for non-residential development outside of town centres and have historically been safeguarded to meet local economic needs on previously-developed land. This designation is also shown on the Harrow proposals map. Many smaller sites (not shown) occur throughout the Borough, often for historical reasons or on 'left-over' behind shops and houses.

7.6 Harrow town centre is one of 11 Metropolitan centres in London and provides the Borough's main cluster of employment opportunities in the office, retail and leisure sectors. In recent years there has also been increasing interest in Harrow town centre as a location for hotel development, which is encouraged. The rest of the Borough's town centre network comprises district and local centres that provide a mix of local shops, services and other employment opportunities.

7.7 Economic development is defined as development within the B Use Classes, public and community uses and main town centre uses⁽⁷⁴⁾. This is a much wider definition than has traditionally been applied in Harrow, where employment land has been safeguarded primarily for B1, B2 and B8 uses. The new definition supports the development of economic sectors that do not fall neatly into existing land use classifications and will enable diversification to take place in response to changes in market demands. However, main town centre uses are defined as: retail development⁽⁷⁵⁾; leisure, entertainment and more intensive sport/recreation uses⁽⁷⁶⁾; offices; and arts, culture and tourism development⁽⁷⁷⁾. In accordance with the National Planning Policy Framework and the London Plan, and in the spirit of Harrow's spatial strategy, such uses will be directed to the Metropolitan, major, district or local centres as appropriate, and (where relevant) to sequentially preferable sites. Harrow's Core Strategy identifies Harrow town centre, within the Harrow & Wealdstone Intensification Area, as the Borough's principal location for growth in retail and leisure development, the emerging new hotel sector, and for consolidation and renewal of the local office market.

7.8 In 2009 the Council commissioned additional evidence to assess the resilience of Harrow's economy to current and foreseeable economic conditions, and to assess the supply and demand for employment land in the Borough over the period to 2026. It found that there is likely to be a surplus of land for traditional industrial and warehousing uses as growth in these sectors slows or even contracts, but that there remains a need to monitor and safeguard sufficient supply and, more importantly, to improve the quality of provision to meet future needs. The challenge for Harrow is therefore to manage the Borough's supply more effectively, by creating the right environment for economic development and diversification, and to provide a clear framework for the release of redundant, surplus stock. The office sector is particularly challenging, where a high surplus of

74 Glossary, National Planning Policy Framework (2012).

75 Including retail warehouses and factory outlets.

76 Including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls.

77 Including theatres, museums, galleries and concert halls, hotels and conference facilities.

redundant stock, low market rents and a market that is local (rather the sub-regional) in focus combine to discourage speculative development. Policies must allow for the diversification and release of office floorspace, but without creating conditions that crowd out traditional office uses in the micro-markets of Harrow's town centres, and encourage appropriate levels of modern, new provision in mixed use development.

MANAGING THE SUPPLY OF CAPACITY FOR ECONOMIC ACTIVITY AND EMPLOYMENT

Policy 39

Managing Land Supply: Industrial and Business Use Land and Floorspace

- A. Existing industrial and business use land and floorspace will only be considered for release to non economic development uses where:
 - a. an assessment of demand and supply demonstrates that there is a material surplus in the Borough, taking into account any unimplemented planning permissions;
 - b. the assessment of demand and supply demonstrates that there are no other, sequentially more preferable sites that are surplus to requirements; and
 - c. whether the proposed development and uses contribute to the spatial strategy set out in Harrow's Core Strategy.
- B. For the purposes of the assessment required under (b) above, the sequential order of preference for site release is:
 - a. land and buildings not identified on the adopted policies map as forming part of a designated industrial and business use or business use area;
 - b. land and buildings identified on the adopted policies map as forming part of a designated industrial and business use or business use area and which are assessed as being no longer fit for purpose;
 - c. land and buildings identified on the adopted policies map as forming part of a designated industrial and business use or business use area;
 - d. land and buildings identified on the adopted policies map as forming part of a strategic industrial location and which are assessed as being no longer fit for purpose;
 - e. land and buildings identified on the adopted map as forming part of a strategic industrial location.
- C. Proposals that meet the infrastructure needs of emergency services on industrial and business use land will be supported where there is a proven need for the facility which outweighs the loss of employment land capacity.

Reasoned Justification

Demand, Supply and Spatial Planning Considerations

7.9 As with much of north and west London, Harrow is identified as an area for 'limited transfer' of industrial land to other uses in the London Plan. This is an intermediate category between areas where there is a substantial supply of surplus industrial land (managed transfer) available for release, and areas where a cautious approach to land release is justified (restricted transfer). The Harrow Employment Land Study (2010) provides an assessment of the potential balance of supply and demand for employment land and floorspace over the period 2007 to 2026. This indicates⁽⁷⁸⁾ a surplus of 8.3 hectares industrial land⁽⁷⁹⁾ and 2.9 hectares distribution land⁽⁸⁰⁾, or in floorspace terms 33,200m² industrial space and 11,500m² distribution space⁽⁸¹⁾. Whilst clearly highlighting the need to achieve a contraction of supply over the period to 2026, the scenarios tested show some variability in the degree of surplus⁽⁸²⁾ and are subject to the inherent uncertainties of long-term forecasting. In the context of Harrow's modest overall stock of industrial and warehousing land, the quantitative release of land will require careful monitoring and management to ensure the efficient functioning of the local economy and a diversity of job opportunities for residents.

7.10 However, monitoring the land supply and demand balance is, on its own, a crude measure of the quantitative capacity for economic activity and development in the Borough. The loss of industrial sites occupied at high densities could indicate a small incremental losses of land area, but could involve a loss of greater significance when measured by floorspace. Alternatively warehouse sites could involve high losses of both land and floorspace. The renewal and intensification of sites, encouraged by Policy XX (39), offers the potential to maintain or increase floorspace and achieve significant qualitative improvements of premises unsuited to modern needs or in poor condition. For this reason, the Council will take into account the balance of floorspace and land area in the quantitative consideration of proposals for release of industrial and business use supply to non economic development uses.

7.11 Whilst the appearance of vacant industrial and warehouse premises in an area may give the impression of over supply, a modest level of vacancy is considered to normal and healthy attribute of market activity. Vacant premises allow firms to move around, as they expand or contract, and help to ensure a choice of available business premises. They also provide a buffer between economic growth and the ability of the development industry to respond to market signals to provide additional capacity. The Employment Land Study (2010) recommends a margin of 10% vacancy for these purposes. The Council will therefore consider a material surplus of land or floorspace to that which exceeds a vacancy level of 10%.

7.12 Over recent years the Borough has experienced a trend of continual losses in land and floorspace for industrial and business activity. Numerous small, incremental losses have been supplemented by the loss of some larger sites to residential use including part of the Honeypot

78 Based on the Council's preferred scenario of baseline job growth at Table 6.11, page 67 of the Harrow Employment Land Study (2010). The Study addresses supply and demand throughout the Borough, including the Harrow & Wealdstone Intensification Area.

79 Use Class B1c and B2.

80 Use Class B8.

81 Based on the Council's preferred scenario of baseline job growth at Table 6.6, page 62 of the Harrow Employment Land Study (2010).

82 Note that the scenario based upon past development rates reveals a positive requirement in the distribution sector.

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Lane Strategic Industrial Location at Stanmore, and the highly accessible Biro House site in South Harrow. These demonstrate the absence of a managed, spatial approach to release which this policy seeks to remedy.

7.13 Proposals seeking the re-development of industrial and warehousing sites or premises for non-economic development uses must be accompanied by information to demonstrate how the application has met the requirements of this policy. Part 1 of the statement should comprise a rigorous analysis of the demand/supply balance. The Council's Annual Monitoring Reports and Available Business Premises surveys will provide up-to-date information on the amount of industrial and warehouse land and floorspace, recent trends, and pipeline supply resulting from extant planning permissions. This should be supplemented by market intelligence about local needs and demand and a schedule of other sites that are surplus to requirements in the Borough. In considering proposals for release, the Council will have regard to the potential of the proposed non-economic development or use to contribute to the Borough's spatial strategy.

7.14 The Council will issue further, detailed guidance on the information that should be included in demand and supply assessments required by this policy.

Sequential Preference Considerations

7.15 The overall objective of applying a sequential approach will be the retention of sites of that are of greatest strategic significance, and those which are fit for purpose (including the potential for viable investment or redevelopment to enhance fitness for purpose). The table below shows the breakdown of industrial and warehouse provision in the Borough; the categories of land are:

- Non designated land: sites and premises that are in existing industrial or warehouse use but which are not identified on the Harrow proposals map. These are typically small and fragmented sites in single-user occupation and of limited individual value, but nevertheless make a cumulative (and often low-cost) contribution to supply.
- Designated industrial and business use land: sites and premises that are identified on the Harrow proposals map as industrial and business use areas. They comprise purpose built industrial estates or clusters of premises in multiple occupation, and a small number of sites in single-user occupation, generally well located in relation to town centres and public transport infrastructure.
- Strategic Industrial Location (SIL) land: sites and premises that form the Honeypot Lane part of the Strategic Industrial Location land identified on the Harrow proposals map. This is a London Plan designation which reflects the strategic importance of these strategic locations as the city's main reservoir of industrial capacity.

7.16 The Harrow proposals map also shows town centres and the Northolt Road business use area, suitable for office and related uses⁽⁸³⁾. These relate to Policy XX38 below.

7.17 Where it has been demonstrated that there is a quantitative case for release, there will be a presumption in favour of non-designated land and buildings. After non-designated sites, the sequential order of preference for release is land and buildings forming part of designated industrial and business use land, with land and buildings within the strategic industrial location the least preferable category. Within each of these two categories, a fitness for purpose test will also be applied with the objective of securing the release of lower performing sites before better sites or the higher category are reached.

83 Use Class B1a and B1b

7.18 Proposals seeking the re-development of industrial and warehousing sites or premises for non-economic development uses must be accompanied by information to demonstrate how the application has met the requirements of this policy. Part 2 of the statement should set out how the proposal relates to the sequential approach, documenting the other sites that have been identified as available or likely to come forward, and provide a rigorous analysis of the application site's fitness for purpose. To ensure a consistent approach in methodology, the following suitability criteria must be used:

1. Strategic and local road access;
2. Accessibility to public transport and services;
3. Compatibility of adjoining uses;
4. Internal environment, including the quality and condition of existing buildings;
5. Site size and potential development constraints; and
6. Attractiveness to the market, including vacancy and market activity on sites.

7.19 Justification and an indicative score (using the range: 1 very poor, 2 poor, 3 moderate, 4 good and 5 very good) must be provided in relation to each of the above attributes. These together with any available, up-to-date market intelligence should be used to inform judgements of the site's fitness for purpose.

7.20 London Plan Policy 4.4 *Managing Industrial Land and Premises* recognises the potential of surplus industrial land to meet requirements for other uses including the infrastructure needs of emergency services. Such needs might include patrol bases, custody suites and other facilities that do not require general public access but do need good access to the road network and higher levels of parking than would be appropriate in areas with high levels of public transport accessibility. Therefore, proposals for emergency services infrastructure on industrial and business use land will be supported where there is a proven need for that facility which would outweigh its location on a site otherwise designated for employment generating activities.

7.21 Proposals for the release of industrial and warehouse land that do not comply with this policy, or which are otherwise at odds with Harrow's spatial strategy, will be resisted unless there are compelling reasons of public interest to grant planning permission.

Policy 40

Managing Land Supply: Town Centre Offices and Northolt Road

- A. Proposals for the redevelopment or change of use of purpose-built offices located in town centres and the Northolt Road business use area will be permitted where it can be demonstrated that:
 - a. the building is no longer fit for office occupation having regard to the level and duration of vacancies within the building, the age and condition of the building, and the needs of potential occupiers in the local office market; and
 - b. an assessment of demand and supply demonstrates that there is a material surplus of office space in the local market and throughout the Borough, taking into account any unimplemented planning permissions.

- B. Proposals for the comprehensive redevelopment or change of use of buildings which provide 1,000 or more square metres of office floorspace will be required to make viable provision for replacement office space or other appropriate economic uses. The scale of replacement office or other economic uses required will be informed by the role and function of the town centre, the proposal's overall contribution to employment, the employment yield of the floorspace in the existing building, the value of any community benefits including the provision of affordable housing, and development viability.
- C. The redevelopment or change of use of offices in other locations beyond the Intensification Area will be permitted where an assessment of demand and supply demonstrates that there is a material surplus of office space in the Borough, taking into account any unimplemented planning permissions.

Reasoned Justification

7.22 For office space, the Harrow Employment Land Study (2010) indicates⁽⁸⁴⁾ a requirement for an additional 1.2 hectares land or 24,100m² in floorspace terms⁽⁸⁵⁾ and taking into account the need for 10% margin (equivalent to two years' supply) of normal market vacancy. However, this overall picture of projected growth requires cautious interpretation. Any expansion of office floorspace needs to be reconciled with the characteristics of Harrow's office market and demand for Borough's existing stock.

7.23 In the sub-regional context there is little demand from large corporate occupiers for office space in the Borough. Rather, Harrow's office market is localised in nature with demand focusing on smaller scale space and flexibility of terms. However the needs of the market contrast sharply with the characteristics of the Borough's existing stock. Nearly 60% of Harrow's offices date from the 1960s and 1970s⁽⁸⁶⁾ and were designed for single public and private sector occupiers. The stock suffers high levels of vacancy while comparatively low rental values discourage investment and renewal. Speculative provision of new offices to meet the needs of Harrow's local market and achieve modest, longer term growth in floorspace is therefore unlikely.

7.24 The Borough's Core Strategy seeks to focus consolidation and renewal of office space upon Harrow town centre, both to reflect its Metropolitan centre status and where the potential of mixed-use development to help deliver significant components of replacement floorspace is greatest. However, there will continue to be a role for office space beyond Harrow town centre and it is therefore necessary to manage the release of floorspace with the aim of reducing overall levels of vacancy in the Borough, securing the retention of existing space which continues to be fit for purpose, and encouraging the provision of new space which supports the proper functioning of town centres.

84 Based on the Council's preferred scenario of baseline job growth at Table 6.11, page 67 of the Harrow Employment Land Study (2010). The Study addresses supply and demand throughout the Borough, including the Harrow & Wealdstone Intensification Area.

85 Based on the Council's preferred scenario of baseline job growth at Table 6.7, page 63 of the Harrow Employment Land Study (2010).

86 Figure 4.7, Harrow Employment Land Study (2010)

Release of Surplus, Redundant Offices

7.25 The Borough's town centre network, and the Northolt Road business use area, are shown on the Harrow proposals map. Proposals for the redevelopment or change of use of purpose built offices in these locations will be managed, consistent with Harrow's spatial strategy, to balance the protection of the needs of the local office market and to reduce surplus in the local market and throughout the Borough. The aim of the policy is to release stock which no longer meets the needs of office occupiers and to resist the displacement of active office occupiers to higher value uses. The diversification of offices for other economic development uses, where these are appropriate, will be supported. Proposals for the conversion of small office premises above shops (i.e. not in purpose built blocks) will be assessed on their own merits and not against the criteria set out in the policy.

7.26 Applicants should provide supporting information to demonstrate how the proposal relates to the criteria and aim of this policy. A distinction will need to be drawn between premises that are vacant as a result of normal market activity and those where there is endemic vacancy, indicative of unsuitability to occupier's needs. Robust market intelligence of levels of activity and turnover in the local office property market should be used to inform this distinction. Where information about the appropriate period of vacancy is not provided or is unreliable, a period of two years' vacancy will be applied. Consideration will also be given to the extent of the vacancy; i.e. whether it relates to the whole building, substantial parts of it or smaller components. Local market intelligence should substantiate the adequacy of the marketing undertaken having regard to the level of rent or the sale price sought, the form and frequency of the marketing exercises in relation to the target market, and (where relevant) the degree of flexibility offered (such as rent-free periods and subdivision). Details of the general age and condition of the building should be provided, and the extent to which these factors impede the attractiveness of the building to potential occupiers in the local office market should, again, be informed by local market intelligence.

7.27 Given the potential for subtle and more significant variations in office markets between town centres in the Borough, applications should include an assessment of office demand and supply conditions pertaining to the town centre in which the site is located. This will also apply to the Northolt Road business use area. To provide a strategic overview of the demand and supply balance consideration will also be given of the proposal's impact in relation to the Borough-wide picture. The Council's Annual Monitoring Reports and Available Business Premises surveys will provide up-to-date information on the amount of floorspace and vacancy rates in the Borough's supply, recent trends, and pipeline supply resulting from extant planning permissions.

Renewal of Local Office Supply

7.28 The above provisions will enable the release of surplus and redundant office stock but will not encourage the supply of new office floorspace or other uses, which support local economic development. Proposals for the redevelopment or change of use of buildings involving 1,000 square metres or more office space should therefore be mixed-use to include some floorspace which contributes to economic development.

7.29 The form of replacement provision to be included in any mixed-use scheme should be informed by the evidence gathered to justify the loss of the existing building. Where the local market intelligence indicates that there is a demand for offices in the locality, and that other factors (such as the age and condition of the building) are the reason for a lack of interest in the existing premises, then it will be appropriate to include some new office space. The proposed new office space should have a viable future in relation to the local market, responding to its needs in terms of the size/form

of the space to be provided, the quality specification and accessibility or parking requirements. Where the local market intelligence indicates that there is no demand for office space in the locality, consideration will be given to other appropriate economic uses where these are compatible with residential or other use components with the scheme. Within the Northolt Road business use area, main town centre uses will not be appropriate alternative economic uses.

7.30 The amount of floorspace to be reprovided for office or other economic uses will be determined on the circumstances of each proposal, having regard to available information about demand and supply in the local market, the potential for new offices to achieve a higher job floorspace ratio through more efficient and flexible occupation of space, the need to maintain the viability of development and the other potential benefits of the proposal. Within town centres, the amount of floorspace to be provided for office or other economic uses should be related to the role and function of the centre.

Other Offices

7.31 Outside of town centres and the Northolt Road business use area, the redevelopment or change of use of redundant offices will be permitted where evidence shows that there is a material surplus of office space throughout the Borough, in terms of vacancy levels and taking into account pipeline changes in supply arising from unimplemented planning permissions.

SUPPORTING ECONOMIC ACTIVITY AND DEVELOPMENT

Policy 41

Economic Activities and Development

- A. Proposals for economic development and uses, and appropriate ancillary supporting uses, which are appropriate Industrial Business Park activities will be permitted on land identified on the Harrow proposals map as forming the Honeypot Lane Strategic Industrial Location, subject to the consideration of any impacts listed under Criterion C.
- B. Proposals for economic development and uses, and appropriate ancillary supporting uses, will be permitted on existing industrial and business use land subject to the consideration of any impacts listed under Criterion C.
- C. Proposals for economic development and uses will be resisted where:
 - a. there would be an adverse impact upon the amenity of any neighbouring residential occupiers or the character of the area;
 - b. the proposal would prejudice the proper functioning of any neighbouring economic activity;
 - c. the proposal would be inappropriately located having regard to likely number and modal split of trips generated, the public transport accessibility level of the site and the capacity of the highway network; and
 - d. the proposal would not make satisfactory arrangements for servicing, parking and inclusive access.
- D. Town centre development and uses will not be permitted on existing industrial and business use land other than:
 - a. the provision of appropriate ancillary supporting uses;

- b. existing industrial and business use land within a town centre boundary; or
 - c. existing industrial and business use land on the edge of a town centre, where there is a need for the development and application of the sequential test for town centre uses has failed to identify a suitable site within the town centre boundary.
- E. Comprehensive redevelopment of industrial and business use estates which improve their fitness for purpose is encouraged. The Council will support partial residential development for live/work units as part of any comprehensive scheme where:
- a. an assessment of demand and supply demonstrates that there is a material surplus of industrial and business use land in the Borough, taking into account any unimplemented planning permissions;
 - b. the comprehensive scheme would achieve demonstrable improvements in fitness for purpose;
 - c. it can be demonstrated that residential development is necessary to facilitate the delivery of a comprehensive scheme;
 - d. the residential component is limited to that which is necessary to achieve the delivery of a comprehensive scheme; and
 - e. there would be no conflict between the residential and economic uses within or surrounding the site.

The Council will secure the delivery of all the benefits proposed in a comprehensive scheme by Planning Obligation.

Reasoned Justification

7.32 Whilst pointing to an overall surplus in the Borough's supply of industrial and warehousing land and floorspace, the Harrow Employment Land Study (2010) also provides evidence of a healthy, local industrial market and in particular a strong indigenous small business base. A need to improve the supply of modern small to medium sized industrial business units, including premises suited to the start up and growth of new businesses, is highlighted by the Study. The redevelopment and intensification of high quality industrial and business use sites with proven demand to meet identified needs could also help to free-up older premises on less suitable sites, and in so doing contribute to the release of sites in accordance with Policy 37.

7.33 Strategic Industrial Locations (SIL) are a London Plan designation which reflects the strategic importance of these locations as the city's main reservoir of industrial capacity. The Honeypot Lane SIL is classified as an industrial business park, a classification which the Policy 2.17 of the London Plan defines as suited to activities that need a better quality environment including research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution. Policy 2.17 of the London Plan resists proposals within or adjacent to SILs that would compromise their integrity or effectiveness for accommodating suitable activities.

7.34 Harrow's Local Economic Assessment shows that the Borough has a plural economy with no one, dominant or underpinning sector. This represents a local economic strength. To facilitate continued business formation and growth the Council will support economic development and

uses⁽⁸⁷⁾ on existing business and industrial use land including those that may not sit neatly within established business and industrial land use classifications, but which nevertheless make important contributions to the local economy and employment. Industrial and business use land will also be appropriate for emergency services infrastructure that are not used by visiting members of the public, such as patrol bases, and for employment-related skills and training facilities (particularly where there is strong synergy with local business). However emergency services premises with a public counter (such as police stations) and general educational colleges will be directed to locate within town centres.

7.35 The southern part of the Honeypt Lane SIL has a sensitive relationship with facing dwellings in Wigton Gardens and Dalston Gardens and will require particular attention to the potential impacts of proposed uses and development. Proposals which secure qualitative improvements to the environment of the Honeypt Lane SIL will increase its attractiveness as an industrial business park and help manage the interface between the commercial and residential areas. Throughout the Borough, the positive benefits of proposals for economic development and uses will need to be balanced against any adverse impacts and, where possible, such impacts should be mitigated.

7.36 Nevertheless, the nature, scale and location of some development or uses may give rise to adverse impacts which are unacceptable and will be resisted. Proposals should secure satisfactory relationships with any neighbouring residential property and should be located to avoid activities that are likely to cause nuisance to adjoining occupiers by reason of noise, light, smoke or other emissions. The areas designated for industrial and business use on the Harrow proposals map reflect the suitability of these locations for activities which, elsewhere, may be inappropriate or inconsistent with the area's character in terms of the nature and scale of activity. Even where an economic use or development is suitable to its location, the nature and scale of the proposal should not prejudice the proper functioning of any neighbouring economic activity. Consideration will be given to transport impacts and in particular forecast trip generation and modal split. Proposals should contribute to the Borough's spatial strategy by locating high trip generating development and uses in locations with good public transport accessibility and sufficient highway network capacity to accommodate any traffic generation. The arrangements for servicing, such as delivery vehicles and refuse collection, should form an integral part of the scheme's design and layout and avoid creating or adding to poor conditions in the public realm. Proposals should contribute to the achievement of lifetime neighbourhoods, in accordance with Policy 2, by making satisfactory provision for disabled persons' car parking and ensuring inclusive access to and within the premises.

7.37 Economic development and uses which are main town centre activities will be directed to locate within town centres and will not be appropriate within industrial and business use areas. However, this will not preclude the provision of appropriate, ancillary supporting uses such as small walk-to shops, cafés and workplace creches that are designed to primarily meet the needs of employees, or trade counters. Surplus industrial and business use land within town centres, and edge-of-centre sites, will also be appropriate for town centre uses where the proposal complies with relevant town centre policies including the sequential test for retail and leisure development.

7.38 The Harrow Employment Land Study (2010) highlights the potential challenges of fragmented ownership, amenity concerns and the pressure from higher-value land uses to the improvement and intensification of the Borough's supply of premises for industrial and business use. Comprehensive redevelopment of whole industrial and business use estates will provide the best

87 Except main town centre uses, which will be directed to locate within Harrow Metropolitan centre, district or local centres as appropriate to the scale and function of the proposal.

opportunity for create viable, attractive environments for economic activity and to deliver intensification whilst managing impacts upon neighbouring uses beyond the boundary. To encourage a comprehensive approach to renewal and intensification the Council will pro-actively support appropriate schemes through the planning process including land assembly where this is required. Appropriate schemes will be those that can clearly demonstrate improvement to the site's fitness for purpose. The site's existing and proposed fitness for purpose must be assessed against the following suitability criteria:

1. Strategic and local road access;
2. Accessibility to public transport and services;
3. Compatibility of adjoining uses;
4. Internal environment, including the quality and condition of existing buildings;
5. Site size and potential development constraints; and
6. Attractiveness to the market, including vacancy and market activity on sites.

7.39 Justification and an indicative score (using the range: 1 very poor, 2 poor, 3 moderate, 4 good and 5 very good) must be provided in relation to each of the above attributes. These together with any available, up-to-date market intelligence should be used to inform judgements of the site's existing and potential future fitness for purpose.

7.40 It is recognised that the level of investment needed in some sites to achieve required improvements and intensification may pose viability challenges. Where robust evidence demonstrates that this is the case, the Council will consider partial residential development to provide live/work units as a financial enabler of comprehensive, whole estate schemes. A quantitative assessment of industrial and business use land should be carried out, in accordance with the methodology set out in the reasoned justification to Policy 37, taking into account the pipeline of new premises associated with any unimplemented planning permissions, to provide evidence of the supply/demand balance in the Borough. Where there is a material surplus, as defined under Policy XX, partial enabling development on sites which would not otherwise be released will be acceptable in principle. However, the proposal must be a comprehensive scheme that achieves demonstrable improvements in fitness for purpose, as described above, and the residential component must be the minimum necessary to fund the scheme and not compromise the future functioning of the site. A Planning Obligation will be required to secure the delivery of all of the scheme benefits which justify the residential development and to recover the full cost to the Council of any land assembly interventions.

ECONOMIC ACTIVITY AT RESIDENTIAL PROPERTY

Policy 42

Working at Home

- A. Home working and ancillary economic activity at home by the occupiers of residential property will be permitted where the applicant can demonstrate that:
 - a. the property would remain substantially residential in character and occupation;
 - b. there would be no detrimental impact upon the amenities of neighbouring occupiers by reason of noise, pollution, levels of internal or external activity, traffic and parking;

- B. Proposals for major new residential development should demonstrate that all of the homes incorporate adequate space for home working.
- C. Proposals for live/work units will be supported where these do not compromise other policy objectives, including those for the management of industrial and business use land supply.
- D. Proposals for home working and ancillary economic activity that would result in the substantial loss of a dwelling, or which would be detrimental to the amenity of neighbouring occupiers, will be refused.

Reasoned Justification

7.41 Home working enables many people to strike a balance between their domestic and professional lives, and by obviating the need for expensive and time consuming commutes can improve quality of life. For others, starting a business at home can be the first entrepreneurial step towards the creation of a successful economic enterprise. Home working and ancillary economic activity at home has a range of economic and environmental benefits which merit support. However large scale and intrusive activities are unlikely to be appropriate within residential areas and potentially at odds with the Borough's spatial strategy.

7.42 Many forms of home working do not need planning permission; for example, employees who work remotely from their main office base or those who are road-based but carry out administrative tasks from home. Planning permission is required when there is a material change in the use of the property. Those intending to undertake economic activity at home are advised to first discuss the matter with Council officers to determine whether planning permission is likely to be required. A material change of use may also occur where an existing economic activity at home expands to become a substantial or the principal use of the property. Where this is the case, it will usually be appropriate to provide suitable alternative premises.

7.43 Where planning permission is required, proposals will be considered against the criteria set out in this policy. The aim is to ensure that Harrow's residential areas remain attractive and peaceful places to live, and that the living conditions of those surrounding the activity are not adversely affected. The property should remain substantially residential character, meaning that it should still be mainly occupied for residential purposes and that there should be no significant, external indication of the commercial use. On going use of garden areas or outbuildings for significant levels of commercial storage and large or illuminated signs are unlikely to be consistent with residential character and amenity. Proposals for advertisements will be assessed against Policy 5. Activities which give rise to noise, odour, effluent, vibration, dust or other noxiousness emissions will be resisted. Over prolonged periods abnormally high levels of activity within the building or that associated with deliveries and business callers can cause disturbance and nuisance, and will be indicative of a scale of activity not appropriate in a residential area. Similarly, proposals should not generate high levels of traffic or inconsiderate parking activity that could cause a nuisance to, or obstruct the movements of, neighbouring residents.

7.44 When considering whether the property would remain substantially residential in character, and whether there would be unacceptable impacts on neighbouring amenity, the Council will take into account the presence of employees on the site and how they are accommodated within the premises during working hours. This will include consideration of full time and part time employees, and the extent to which they are present on the site during operational hours.

7.45 Retail and wholesale activities from residential property are not consistent with residential amenity and character, and will be resisted.

7.46 For the purpose of this policy, home occupation is defined as the use of a residential property for an employment activity, which is secondary and ancillary to the use of the site for residential purposes, where the employment use:

- Is performed by the member of the household unit residing in a residential unit on the site;
- Is carried on either wholly within the residential unit or within an accessory building; and
- Generates effects that are not significantly different from those within the immediate residential environment.

7.47 New residential development provides the opportunity to 'design in' space for home working. The London Housing Design Guide (interim edition) recognises that technology and more flexible working practices enable many people to work from home, and notes that credits are awarded under the Code for Sustainable Homes for the provision of space and services that enable a room to be used effectively as a home office. Pursuant to the Design Guide's recommended standards, the Council will seek the incorporation of adequate space for work and study within each home proposed in major developments.

7.48 Purpose-built live/work units can provide a useful addition to the supply of space for economic development in the Borough. London Plan Policy 4.6 Support for and Enhancement of Arts, Culture, Sport and Entertainment Provision recognises the particular value of flexible live-work premises to the creative industries. Proposals for live work units in Harrow will be supported where the applicant can demonstrate that the live work units are a genuine proposition for economic activity on the site and not a means of securing residential development on designated business and industrial use land. A Planning Obligation will be required to retain any live-work units that are approved in economic use, and to secure any necessary management/servicing arrangements. Proposals that would compromise other policy objectives, including those for the management of industrial and business use land supply, and those which seek to safeguard the operating conditions of surrounding economic activities from the introduction of sensitive uses, will be refused.

7.49 Consistent with the London Plan (2011) and Policy *XX Protection of Housing*, the Council will resist proposals that involve the complete or substantial loss of a dwelling, and those which would be detrimental to the amenity of neighbouring occupiers.

SUPPORTING THE VISITOR ECONOMY

Policy 43

Hotel and Tourism Development

- A. Proposals for new hotel development outside of the Harrow & Wealdstone Intensification Area will be directed to sites in accordance with the following sequential order of preference:
 - a. town centres;
 - b. edge of centre;
 - c. areas with a high public transport accessibility level.
- B. All major proposals for hotel and tourist attractions will be required to produce a transport assessment supported by a Green Travel Plan to enhance sustainable access to the site.
- C. New hotel development and tourist attractions, and alterations or extensions to existing premises, must achieve inclusive access and contribute to the creation of lifetime neighbourhoods. New hotel development providing 10 or more bedrooms must achieve a minimum 10% wheelchair accessible bedrooms.
- D. Proposals for guest houses and bed & breakfast accommodation will be permitted provided that:
 - a. the size and character of the site or building are suitable for the proposed use;
 - b. the development will be compatible with the character and appearance of the area;
 - c. the residential amenities of local residents will not be harmed by way of noise, disturbance, loss of light or privacy;
 - d. where practical, the building will be wheelchair accessible;
 - e. it would not result in an over-concentration of the type of accommodation within the locality;
 - f. there will be good access and links or opportunities for good access and links to modes of transport other than the private vehicle; and
 - g. vehicle access to and from the highway will be safe.
- E. The Council will encourage the development and improvement of tourist related attractions and facilities, provided there is no unacceptable impact on the environment or residential amenity. Preference will be given to proposals for tourist facilities that also meet local cultural and recreational needs.

Reasoned Justification

7.50 The Mayor of London's Tourism Vision is ensure that London expands as a global tourism destination. London should develop a broader visitor base and spread the benefits of tourism throughout the city.

7.51 There has been increasing developer interest for new hotel development in Harrow in recent years. The Borough is conveniently situated for visits to central London, Wembley Stadium and Wembley Arena and accommodation is often competitively priced. The London 2012 Olympic and Paralympic Games has been a particular stimulus in recent years, but Harrow accommodation also enjoys demand from residents' friends and family visitors. Local visitor attractions include Harrow School, Harrow Museum and West House (including the Heath Robinson Collection).

7.52 The Borough's spatial strategy directs major new hotel and leisure development to Harrow town centre, reflecting its Metropolitan centre status and in support of the Harrow & Wealdstone Intensification Area objectives. This policy applies to proposals for hotel development and tourist attractions throughout the rest of the Borough.

7.53 Hotel development is a main town centre use. The nature and scale of the proposal should be appropriate to the role and function of the town centre. Proposals will be directed in sequential preference, having regard to nature and scale⁽⁸⁸⁾ to sites within town centres and, if no suitable sites are available, edge of centre and then other areas with a high level of public transport accessibility. Proposals which are inappropriate to the location and at odds with the Borough's spatial strategy will be resisted.

7.54 For tourist attractions focus should be paid to optimising visits by sustainable means. Green travel plans should be used to demonstrate the scope to increase the proportion of trips that could be made by sustainable modes, and a deliverable action plan.

7.55 The London Plan sets a target to deliver 40,000 additional hotel rooms in London by 2031, and seeks to achieve at least 10% as wheelchair accessible rooms. Harrow will contribute to this strategic target by requiring 10% of the bedrooms in new hotel developments of 10 or more rooms to be wheelchair accessible. Smaller hotel developments should also consider providing wheelchair accessible rooms where this is feasible. However, the provision of wheelchair accessible bedrooms is meaningless if not part of a comprehensive approach to inclusive design. The Council is committed to the achievement of lifetime neighbourhoods and will expect new hotel development and tourist attractions to make a proper contribution to this objective. Existing hotels and attractions which do not meet modern standards of inclusive access will be expected to use the opportunity provided by relevant alterations and extensions to improve accessibility to be fully exploited.

7.56 Guest houses and bed & breakfast accommodation help to diversify the supply of visitor accommodation and can offer a more homely, personal environment than larger hotel chains. Such uses also provide business opportunities for residents that contribute to local economic activity. However care is needed, particularly in residential areas, to balance the impacts of guest house and bed & breakfast uses with the amenity of neighbouring occupiers and the character of the area. The size and layout of the building should be suitable for the proposed use and in particular the number of guest rooms; over-intensive use of a property is likely to give rise to disturbance to neighbouring occupiers and could generate an excessive level of external activity by visitors' arrival and departure. Even where individual proposals are acceptable, an over concentration of guest

88 Including the likely number of trips to be generated.

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houses and bed & breakfast accommodation in a road or locality can lead to unacceptable cumulative effects and should be avoided. Proposals should have good access to public transport, or other more sustainable modes of travel, and where car parking is provided there must be safe access to and from the site for the anticipated number and type vehicles.

7.57 The design and layout of any development for guest house and bed & breakfast use will be assessed against Policy 1. Proposals for advertisements will be assessed against Policy 5. Where existing buildings are being used, reasonable arrangements for inclusive access to and within the building should be made including the provision of car parking for disabled people. Proposals for new-build guest houses and bed & breakfast accommodation will be expected to contribute fully to the creation of lifetime neighbourhoods.

7.58 The Council wishes to encourage tourism that does not harm the environment or residential amenity. Proposals that enable land and buildings to be used for the benefit of both visitors and residents are especially welcome. Scope for building new tourist attractions in the Borough is limited. To make the best use of resources and to widen the cultural and recreational opportunities available to local people, flexibility will be sought. This might enable the re-use of buildings, innovative combinations of uses or facilities designed to be adaptable and able to accommodate different activities in the future. Extension and improvement of existing facilities and provision of new facilities in sustainable locations will be encouraged.

Policy 44

Loss of Public Houses

The Council will not permit the redevelopment or change of use of purpose-built public houses unless:

- a. the proposal would support the evening economy (in town centre locations) or provide community uses; or
- b. it is demonstrated that the public house is no longer economically viable and reasonable attempts have been made to market the site as a public house.

Reasoned Justification

7.59 The Town and Country Planning (General Permitted Development) Order (1995), as amended, enables a change of use from drinking establishments (Class A4) to restaurants and cafés (Class A3), financial and professional services (Class A2) and retail (Class A1) without the need for planning permission from the local planning authority. For pubs and bars located with the frontages of town centre retail parades, and neighbourhood parades, the permitted change of use provides valuable flexibility for redundant premises to be converted to uses that support vitality and viability. However experience shows that, for purpose built public houses within town centres and those located in residential areas, the permitted change of use is rarely exercised. The Borough has experienced the loss of a number of purpose-built public houses in recent years for residential redevelopment.

7.60 Public houses can bring communities together, promoting social cohesion and integration and are considered an important element in maintaining vitality and vibrancy within the area. This policy seeks to ensure that redundant purpose-built public houses are considered for appropriate alternative uses and to provide a safeguard against speculative proposals for the redevelopment of such premises.

7.61 The Council supports proposals that enhance the evening economy of town centres (see Policy XX). Proposals for the change of use or redevelopment of redundant premises within town centres which include provision for the evening economy will be supported, subject to the consideration of impacts listed in Policy XX. In residential areas evening economy uses are unlikely to be compatible with amenity and Harrow's spatial strategy and should therefore be avoided, although it is recognised that there is a permitted change of use to restaurants and cafés. In all locations, the Council will support proposals for the change of use or redevelopment of redundant premises which include provision for appropriate community uses.

7.62 Proposals for the change of use or redevelopment to uses that do not make provision for evening economy uses or community uses, as appropriate under criterion (a), will only be accepted where it has been demonstrated that the pub is no longer economically viable and that reasonable attempts have been made to market the site to other operators for re-use as a public house. Supporting evidence should include details of the appointment of a property consultant/estate agent to handle the marketing of the property, and records of where and how the property has been marketed for a minimum of two years.

TOWN CENTRES AND NEIGHBOURHOOD PARADES 8

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8 TOWN CENTRES AND NEIGHBOURHOOD PARADES

INTRODUCTION

8.1 Harrow town centre is classified as a Metropolitan centre and is one of only 11 such centres across London. They serve multi-borough catchments, comprise around 100,000 square metres of retail floorspace with a high proportion of comparison shops, enjoy good public transport accessibility and accommodate a mix of other employment and leisure uses. Reflecting this status and the recommendations of the Harrow Retail Study (2009), the Core Strategy directs major new comparison goods and leisure development to Harrow town centre. The Strategy also seeks to regenerate Wealdstone district centre. Site allocations and policies to realise growth and regeneration within Harrow town centre and Wealdstone are included in the Harrow & Wealdstone Area Action Plan.

8.2 Outside of the Intensification Area, the Borough's network of town centres comprises part of one major centre⁽⁸⁹⁾, eight district centres⁽⁹⁰⁾ and five local centres⁽⁹¹⁾. Town centres form a central plank of the London Plan's spatial strategy for outer London and are at the heart of Harrow's spatial strategy for areas of the Borough beyond the Harrow & Wealdstone Intensification Area. They give Harrow's districts their sense of individual identity and provide basis for sustainable urban living, being inextricably connected with the public transport network. As the demographics and retail behaviour of residents has evolved, the character of the Borough's centres has changed and many now have a complimentary rather than principal role in meeting residents' shopping needs. Nevertheless, they still have a role; it therefore remains important to sustain and where possible enhance the vitality and viability of the Borough's town centres.

8.3 Harrow's network of town centres and their classifications are well established. Local parades of shops supplement the capacity of town centres by providing small walk-to convenience shops and facilities that serve the neighbourhood in which they are situated. These neighbourhood parades are an important part of the Borough's suburban fabric and have been formally recognised for the first time in the Harrow Core Strategy. A total of 34 neighbourhood parades have been identified.

89 Major centres serve a borough-wide catchment, comprise around 50,000 square metres of retail floorspace including a high proportion of comparison shops, and may also have a mix of other employment, leisure or civic uses. Edgware major centre is predominantly located in the London Borough of Barnet but with some secondary frontage and tertiary components extending into the London Borough of Harrow.

90 District centres serve areas within a borough, comprise between 10-50,000 square metres retail floorspace and provide mainly convenience shops and local services or specialist functions. Burnt Oak district centre straddles the boundary with the London Borough of Barnet (also part of Brent) and Kenton district centre straddles the boundary with the London Borough of Brent. Kingsbury district centre is predominantly located within the London Borough of Brent but with some secondary frontage and tertiary components extending into the London Borough of Harrow. South Harrow, Rayners Lane, North Harrow, Pinner and Stanmore district centres are all wholly contained within Harrow.

91 Local centres serve a localised catchment and provide mainly convenience shops and local services or specialist functions. Sudbury Hill local centre straddles the boundary with the London Borough of Ealing. Hatch End, Harrow Weald, Queensbury and Belmont Circle local centres are all wholly contained within Harrow.

8.4 Population growth and general, long-term improvements in household disposable income combine to increase potential spending on retail and leisure activities over time. However, translating this increase into new floorspace projections must be tempered by future trade draw from competitor centres⁽⁹²⁾, the likelihood that retailers will continue to increase sales efficiency of existing property assets, and competition from other forms of retailing most notably the internet. Taking these and other considerations into account, Harrow's Retail Study (2009) forecasts a potential need to provide 39,000m² net comparison retail floorspace and 5,000m² net convenience retail floorspace over the period 2009-2025.

8.5 The National Planning Policy Framework (2012) continues to apply a sequential approach to retail and leisure proposals that prefers town centres, followed by edge of centre locations and only then, if suitable sites cannot be found, out of centre locations. It also continues to require impact assessments to be submitted with applications for retail and leisure development over 2,500 square metres. The London Plan develops the sequential approach further to direct development to centres with a role and function that is related to the scale of the proposal.

PROMOTING HARROW'S TOWN CENTRES

Policy 45

New Town Centre Development

- A. New retail, leisure and cultural development or extensions within town centres will be supported where:
- the proposal is consistent in use and scale with the role and function of the centre; and
 - the proposal is not at odds with the Borough's spatial strategy.
- Proposals on edge-of-centre sites will be permitted where it has been demonstrated through site search and selection that the location is the most sequentially preferable that is available, and that there would be no harm to town centres.
- B. New retail and cultural development or extensions in out of centre locations will only be permitted if:
- flexibility has been demonstrated in the format of the proposed development;
 - it has been demonstrated through site search and selection that there are no appropriate in-centre sites;
 - it has been demonstrated through site search and selection that there are no appropriate edge-of-centre sites;
 - it has been demonstrated through impact assessment that there would be no harm to town centres; and
 - the proposal is supported by a Green Travel Plan to enhance sustainable access between the site and the town centre network.
- C. Retail, leisure and cultural development or extensions of 400 square metres or less will be assessed without the need for sequential assessment.

92 Including central London, Brent Cross, Watford and Uxbridge.

Reasoned Justification

8.6 Harrow's Core Strategy directs major new comparison goods retail, leisure and cultural development to Harrow town centre, to support its role as a Metropolitan centre and help to fulfil the Council's objectives for the Harrow & Wealdstone Intensification Area. The Harrow & Wealdstone Area Action Plan contains site allocations and policies in support of new retail, leisure and cultural development within the Intensification Area. This policy applies to proposals for development throughout the rest of the Borough.

8.7 New retail, leisure and cultural development within town centres can help to maintain, or even increase, their attractiveness to residents and visitors. The Borough's network of town centres comprise a major, nine district and five local centres. Major and district centres have a generally broader function, and wider catchments, than local centres that provide mainly convenience shops and walk-to services. Proposals should be located in centres that are appropriate to the use and scale of the development.

8.8 The aim of this policy is to provide clear support for retail, leisure and cultural development or extensions within appropriate town centres. For those centres with multiple functions the primary shopping area has been defined on the proposals map and should be the focus for retail development in those town centres. Sites within the primary shopping areas, as defined on the proposals map, or those within 300 metres of the primary shopping area, or those falling anywhere within the boundary of other town centres, represent the sequentially most preferable locations for retail, leisure and cultural development or extensions. Where the use and scale of the development is appropriate to the town centre, applications on the sequentially preferable sites need not provide information on site search and selection. Proposals for development which is considered to be inappropriate to the town centre in which it would be located, proposals on edge of centre sites⁽⁹³⁾, and any out of centre development will be required to demonstrate that there are no more sequentially preferable sites having regard to availability, suitability and viability.

8.9 Out of centre retail, leisure and cultural development or extensions pose the greatest potential threat to the viability and vitality of town centres. Such proposals can compete with town centres, particularly where they involve comparison goods retailing, and often reinforce car dependent behaviour. Proposals for new out of centre development will therefore be resisted except as a last resort to meeting the Borough's need for additional retail capacity. Therefore, in addition to robust sequential assessment, the Council will require proposals for out of centre development to demonstrate how it would fulfil identified needs that could not be met in a sequentially more preferable location. Attention will also be paid to the format of the proposed development to consider whether sufficient flexibility has been exercised in the assessment of how other sequentially more preferable sites could meet the identified need. Where the case for out of centre development has been made, the Council will expect the proposal to be accompanied by a deliverable Green Travel Plan to enhance sustainable access between the site and relevant town centres.

8.10 Although not formally a part of the Borough's town centre network, neighbourhood parades are an important component of the Metroland character of Harrow and provide premises for shopping and related local-scale facilities which residents can easily walk-to from their home. It is not the intention of this policy to frustrate the functioning of these parades or other existing local shops. Where large new residential or economic development is proposed, the provision of walk-to

93 For the purposes of this Policy, edge of centre sites are defined as those more than 300 metres away from the primary shopping area, where one has been defined, and in all other cases within 300 metres of a town centre boundary.

shops and facilities to meet the needs of the future residents or employees may be necessary to secure successful, sustainable places in accordance with lifetime neighbourhood principles. For these reasons retail, leisure and cultural development or extensions of up to 400 square metres will not be required to comply with the sequential approach set out in this Policy.

8.11 In accordance with the Government's National Planning Policy Framework (2012), new retail, leisure and cultural development in excess of 2,500 square metres must be accompanied by a robust assessment of the impact of the proposal upon town centres. The assessment should be proportionate to the scale and nature of the development proposed and identify potential impacts in relation to the following:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment of the proposal; and
- The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to ten years from the time the application is made.

8.12 The DCLG *Practice guidance on need, impact and the sequential approach* (2009) remains extant following the publication of the National Planning Policy Framework (2012) and the consequent revocation of the previous suite of planning policy statements. The guidance provides detailed advice on the application of the sequential approach and impact assessment for retail and other development relevant to this policy. In the event that the 2009 guide is revoked and not replaced, the Council will publish local guidance to this end.

SHOPPING FRONTAGES

8.13 The Harrow adopted policies map identifies primary and secondary shopping frontages, within the Edgware major and other district centres, and lengths of designated frontage with local centres. Frontages form the basis of policies for managing the mix of ground floor uses within centres as a whole to ensure that a core, critical mass of retail uses is maintained and that a broader mix of appropriate town centre uses is achieved within secondary and tertiary parades. Harrow's Retail Study (2009) recommended only minor changes to the distribution of primary and secondary frontages in a number of centres⁽⁹⁴⁾ and these are reflected on the proposals map through changes in the Site Allocations DPD. The Council maintains an annually updated database of town centre shopping frontages and this information will form the basis for decision making in relation to the following policies.

Policy 46

Primary Shopping Frontages

- A. Within the primary shopping frontages of district centres as defined on the Harrow proposals map, the use of ground floor premises for retail, financial & professional activities, restaurants & cafés and pubs & bars will be permitted provided that:

94 Pinner, North Harrow, South Harrow and Wealdstone.

- a. the length of primary frontage in non-retail use at street level in the centre (including any extant planning permissions) would not exceed 25% unless it can be demonstrated that the proposed use would make a significant contribution to the centre's vitality and viability;
 - b. the proposal would not result in a concentration of more than three unit frontages in non-retail use;
 - c. the use would not create inactive frontage during the day; and
 - d. the use would not be detrimental to the amenity of neighbouring occupiers or highway safety;
- B. Proposals for other uses within primary shopping frontages will not be permitted unless it can be demonstrated that the use would be directly related to shopping trips and would support the retail function of the district centre.

Reasoned Justification

8.14 There are nine district centres in Harrow providing mainly convenience shopping and related activities of more than local significance, but which sit below Harrow town centre⁽⁹⁵⁾ and Edgware⁽⁹⁶⁾ in the London Plan (2011) town centre hierarchy. Reflecting their role in the hierarchy and their principal retail function, primary shopping frontages have been identified which seek to maintain shopping and supporting uses at the core of these centres. These frontages are shown on the Harrow proposals map. Harrow's Retail Study (2009) highlights the importance of continuing to monitor town centre frontages and to protect 'A' Class uses within town centres.

8.15 The primary shopping frontages of district centres will therefore continue to be safeguarded for retail (Class A1), financial and professional services (Class A2), restaurants and cafés (Class A3) and pubs and bars (Class A4), being the main activities which sustain town centres by attracting shoppers, workers & visitors. The retention of a critical mass of shopping uses remains the best way to sustain vitality and viability at the heart of district centres and to ensure that the Borough's town centre retail capacity is properly protected. The right balance of retail and other appropriate uses will ensure that district centres continue to function as interesting and attractive destinations for shoppers. For these reasons, the policy seeks to limit the proportion of non-retail activity in the primary frontage within each district centre to 25% of that frontage, and to manage the distribution of activities within primary frontage so as to avoid more than three continuous units of non-retail use. To prevent the accumulation of a pipeline of non-retail uses that could exceed the 25% ceiling within primary frontages, the Council will take into account any relevant extant planning permissions. However, in certain cases these limits may be breached where the proposal would significantly help the vitality and viability of a centre, particularly in cases where a unit has been vacant for a substantial amount of time, or the proposal can clearly demonstrate that it would attract a significant number of people to the centre who otherwise would not have visited. Further detail on the method for applying policies on the change of use of shops is provided at Schedule 2.

8.16 Estate agencies, banks, building societies and other Class A2 uses are all a normal part of the streetscene in shopping areas. Together with cafés, restaurants and public houses that are open during the day, these uses contribute to the creation of a lively and varied frontage. By

95 A Metropolitan centre.

96 A Major centre mainly located in the London Borough of Barnet.

contrast take aways (unless forming a part of a café or restaurant use) are rarely connected with shopping trips and more frequently trade as evening rather than daytime activity; for these reasons wholly take away uses will be resisted within the primary shopping frontages of district centres. All other uses that are permitted by this policy should, by definition, create active daytime frontages. Any proposal that would create inactive daytime frontage within a primary shopping frontage will be resisted.

8.17 Residential use of floors above ground floor premises is a strong characteristic of Harrow's town centres and a part of what makes them vibrant and secure places even after the shops have closed. Town centre living offers immediate access to shops, services and public transport, and is often an attractive proposition for younger people. Whilst patently providing a different living environment to more traditional suburban areas, it will remain important to balance any impacts associated with ground floor uses with the preservation of a viable living environment for neighbouring residents. Considerations will include but not be limited to hours of use, the impact of any external alterations or equipment (such as air conditioning extraction facilities), audibility of music or other amplified sound, disturbance from any outdoor seating or smoking areas, and the impact of any vehicular activity. Proposals that would be detrimental to the amenity of neighbouring occupiers, or that would lead to conditions prejudicial to highway safety, will be resisted.

8.18 Uses not falling within the broad definition of A Class uses permitted by this Policy will be resisted, unless it can be demonstrated that the proposal would be directly related to shopping trips and would support the retail function of the district uses.

Policy 47

Secondary and Designated Shopping Frontages

- A. Within the secondary shopping frontages of district centres and the designated frontages of local centres, as defined on the Harrow proposals map, the use of ground floor premises for purposes that are appropriate to a town centre and primarily for visiting members of the public will be permitted provided that:
 - a. in the case of local centres, the length of designated frontage in non-retail use at street level in the centre (including any extant planning permissions) would not exceed 50% unless it can be demonstrated that the proposed use would make a significant contribution to the centre's vitality and viability;
 - b. in the case of district centres, the length of secondary frontage in non-retail use at street level in the centre (including any extant planning permissions) would not exceed 50% unless it could be demonstrated that the proposed use would make a significant contribution to the centre's vitality and viability;
 - c. in the case of uses that would not create an active frontage, a window display or other frontage appropriate to the centre would be provided; and
 - d. the use would not be detrimental to the amenity of neighbouring occupiers or highway safety.

Reasoned Justification

8.19 In addition to the Borough's nine district centres (see above) there are five local centres providing mainly smaller convenience stores and walk-to services for the locality in which they are situated. The secondary frontages of district centres and the designated frontages of local centres are appropriate locations for the full range of A Class uses, including take aways, and any other use which is primarily for visiting members of the public, such as laundrettes, taxi offices and amusement arcades. However a strong presence of retail activity is important within these frontages. Designated frontages form the basis for safeguarding and consolidating the basic convenience retail function of local centres and, for this reason, non retail activities will be limited to 50% of the designated frontage of each centre. In the case of district centres, secondary frontages provide opportunities for retailers that may not be viable within the more expensive primary frontages but which nevertheless add to the overall retail capacity and attractiveness of the centre. In secondary frontages the proportion of non-retail activity within each district centre will therefore be limited to 50% of that frontage. To prevent the accumulation of a pipeline of non-retail uses that could exceed the 50% ceilings, the Council will take into account any relevant extant planning permissions. However, in certain cases these limits may be breached where the proposal would significantly help the vitality and viability of a centre, particularly in cases where a unit has been vacant for a substantial amount of time, or the proposal can clearly demonstrate that it would attract a significant number of people to the centre who otherwise would not have visited. Further detail on the method for applying policies on the change of use of shops is provided at Schedule 2.

8.20 The broader mix of permitted activities within secondary and designated frontages may include some uses that, although appropriate within a town centre, do not create an engaging frontage for shoppers. In such instances the provision of a window display can help to create interest and variety. Innovative solutions which negate inactive frontages will be encouraged.

8.21 Residential use of floors above ground floor premises is a strong characteristic of Harrow's town centres and a part of what makes them vibrant and secure places even after the shops have closed. Town centre living offers immediate access to shops, services and public transport, and is often an attractive proposition for younger people. Whilst patently providing a different living environment to more traditional suburban areas, it will remain important to balance any impacts associated with ground floor uses with the preservation of a viable living environment for neighbouring residents. Considerations will include but not be limited to hours of use, the impact of any external alterations or equipment (such as air conditioning extraction facilities), audibility of music or other amplified sound, disturbance from any outdoor seating or smoking areas, and the impact of any vehicular activity. Proposals that would be detrimental to the amenity of neighbouring occupiers, or that would lead to conditions prejudicial to highway safety, will be resisted.

Policy 48

Other Town Centre Frontages and Neighbourhood Parades

- A. Within the non-designated parades of town centres and neighbourhood parades, as defined on the Harrow proposals map, the use of ground floor premises for purposes that are appropriate town centre, community and economic uses will be permitted provided that:

- a. in the case of non A class uses, a window display or other frontage appropriate to the centre would be provided; and
- b. the use would not be detrimental to the amenity of neighbouring occupiers or highway safety.

Reasoned Justification

8.22 Non-designated frontages within town centres and neighbourhood parades provide opportunities for genuine diversification of town centres to become hubs for local business, services and the community, without undermining the core retail and other principal functions that are protected by the primary, secondary and designated frontages. Potentially positive uses of premises within non-designated parades of town centres and neighbourhood parades include medical and dental surgeries, veterinary surgeries, showrooms, solicitors' offices and community centres. Such uses help to meet residents' needs locally, are easily accessible to people without a car or with restricted mobility, and are partially open to visiting members of the public (for example, to walk in and make an appointment). For the avoidance of doubt, residential is not an appropriate use of ground floor premises in non-designated frontages and neighbourhood parades.

8.23 The wide ranging mix of permitted activities within non-designated frontages and neighbourhood parades may include some uses that, although appropriate within a town centre, do not create an engaging frontage for shoppers. In such instances the provision of a window display can help to create interest and variety. Innovative solutions which negate inactive frontages will be encouraged.

8.24 Residential use of floors above ground floor premises is a strong characteristic of Harrow's town centres and neighbourhood parades, and a part of what makes them vibrant and secure places even after the shops have closed. Town centre living offers immediate access to shops, services and public transport, and is often an attractive proposition for younger people. Whilst patently providing a different living environment to more traditional suburban areas, it will remain important to balance any impacts associated with ground floor uses with the preservation of a viable living environment for neighbouring residents. Considerations will include but not be limited to hours of use, the impact of any external alterations or equipment (such as air conditioning extraction facilities), audibility of music or other amplified sound, disturbance from any outdoor seating or smoking areas, and the impact of any vehicular activity. Proposals that would be detrimental to the amenity of neighbouring occupiers, or that would lead to conditions prejudicial to highway safety, will be resisted.

VACANT PREMISES

Policy 49

Vacant Shops in Town Centres and Neighbourhood Parades

- A. In town centres and neighbourhood parades with a vacancy rate exceeding 10% over a continuous period of two or more years, the use of ground floor premises that have been vacant and marketed for a period of one year will be permitted as follows:

- a. within the primary shopping frontages of district centres, use for retail, financial & professional activities, restaurants & cafés and take-aways;
 - b. within the secondary frontages of district centres and designated frontages within local centres, any use appropriate to a town centre and primarily for visiting members of the public;
 - c. within non-designated frontages of centres and neighbourhood parades, any appropriate economic or community use.
- B. Proposals for the temporary use of ground floor premises that are vacant will be permitted whilst marketing is undertaken for a period of up to 5 years.
- C. Proposals for that would be detrimental to the amenity of neighbouring occupiers or highway safety will not be permitted.
- D. Residential use of ground floor premises in town centres and neighbourhood parades will not be permitted under any circumstances.

Reasoned Justification

8.25 Vacant shop units in town centres and neighbourhood parades are detrimental to their vitality and viability. Short term vacancies are a part of normal market activity as shops change hands and are refurbished for new traders, whilst economic cycles will lead to variability in the demand for town centre premises in the medium term. However long term vacancies may be indicative of more significant, structural problems within a town centre or neighbourhood parade. Moreover, sustained high levels of vacancy within a centre can trigger a negative downward spiral as overall footfall levels reduce, the amount of inactive or 'dead' frontage increases, and perceptions spread that the town centre or neighbourhood parade is in decline.

8.26 To prevent long term, systemic decline taking hold in the Borough's town centres and neighbourhood parades, the Council will consider other uses of vacant shop units where the vacancy rate in the town centre or neighbourhood parade as a whole has exceeded 10% continuously for a period of at least two years and where the premises concerned has been vacant for at least one year. In town centres the vacancy rate will be measured as a proportion of all frontage in the centre. In neighbourhood parades, the vacancy rate will be measured as a proportion of all units in the parade. The applicant must supply evidence to demonstrate that the premises have been vacant and appropriately marketed. In deciding whether to grant planning permission, the desirability of reducing the proportion of vacant frontage or units will be considered in relation to the criteria set out in the policy and amplified below.

8.27 Applicant's will be required to demonstrate that reasonable attempts have been made to market the premises during the period of vacancy. As a minimum, the premises must have been advertised by a competent local estate agent at a realistic rent for a period of at least one year.

8.28 Whilst efforts to reduce vacant frontage should focus on the core of centres where the need to maintain footfall and activity will be most critical, this should be balanced with the need to direct the least suitable uses to more peripheral parades where their potential to damage the proper role and function of the centre may be minimised. To preserve the integrity of primary frontages within district centres, suitable uses will be limited to retail, financial & professional activities, restaurants & cafés and take-aways but proposals need not comply with criteria A (a), (b) and (c) of Policy 44. Similarly, in the case of secondary frontages within district centres and designated frontages within local centres, suitable uses will be limited to those which are appropriate to a town centre and

primarily for visiting members of the public but proposals need not comply with criteria A (a) or (b) of Policy 45. In non-designated frontages of town centres and neighbourhood parades, any appropriate economic or community use will be permitted. In considering whether any other economic or community use is appropriate, attention will be paid to the potential of the proposal to increase footfall, activity and/or the diversity of trading within the centre.

8.29 The temporary use (for up to five years) of vacant premises will be permitted in any centre or neighbourhood parade, irrespective of the vacancy rate within the centre, whilst the premises is being marketed for its authorised or other permitted uses. Temporary uses can help to reduce the perception of dead frontage and support other shops and services within the centre or parade, and can help to fulfil demand for short term economic activities. Planning permission for such uses will be granted strictly on a temporary basis and will not alter the main, authorised use of the premises.

8.30 Proposals for alternative or temporary uses of vacant premises will not be permitted where the use would have a detrimental impact upon the amenities of neighbouring occupiers or where there would be harm to highway safety.

8.31 Residential use of ground floor shop premises sends the strongest possible signal that a town centre or neighbourhood parade is in decline and that any attempt to regenerate it has been abandoned. Moreover, former shop units within town centres and neighbourhood parades rarely provide a satisfactory living environment and their residential use would be at odds with lifetime neighbourhood principles. For these reasons the residential use of ground floor premises in town centres and neighbourhood parades will not be permitted under any circumstances.

Policy 50

Mixed-Use Development in Town Centres

- A. Proposals for mixed use development in town centres will be supported. The appropriate mix of uses will be considered having regard to:
 - a. the role and function of the centre;
 - b. the need to make efficient and effective use of previously-developed land;
 - c. the need to re-provide certain uses on the site in accordance with other policies;
 - d. the compatibility of the uses proposed; and
 - e. any other planning objectives considered to be a priority for the area.
- B. Proposals that would compromise any component of this policy, or would be detrimental to the vitality and viability of town centres, will be refused.

Reasoned Justification

8.32 Mixed use development in town centre locations delivers benefits that cut across a number of policy objectives. Residential uses add to levels of activity within centres after normal trading hours and can support the evening economy, as well as increasing levels of natural surveillance. Additional retail space can increase the 'critical mass' necessary to maintain the attractiveness of centres to shoppers, and therefore help to sustain existing shops. Offices, social infrastructure and other non-retail town centres uses also contribute to the creation of vibrant, vital places at the heart of local communities and in locations generally well served by public transport. For these reasons, single use redevelopment of town centre sites is unlikely to contribute to the realisation of the Harrow Core Strategy's objectives for the town centre network, and should therefore be avoided. Proposals for mixed use development in town centres will be supported.

8.33 The appropriate mix of uses of uses will be considered having regard to:

- **the role and function of the centre;**

8.34 The Borough's town centre hierarchy is set out at Appendix B of the Harrow Core Strategy (2012). Outside of the Harrow & Wealdstone Intensification Area, and excluding Edgware which is mainly located within the London Borough of Brent and is a major centre, the Borough's town centres are classified either as district centres or local centres. The role and function of centres is defined at Annex 2 to the London Plan (2011). The range of uses proposed in mixed use development should be informed by the role and function of the centre in which it is located.

- **the need to make efficient and effective use of previously-developed land;**

8.35 Alongside the Harrow & Wealdstone Intensification Area, the redevelopment of previously developed land within town centres is at the heart of Harrow's spatial strategy for the sustainable accommodation of the Borough's projected growth. In most situations the single use of sites within town centres is unlikely to constitute an efficient and effective use of previously developed land. The residential component of mixed use town centre developments should be consistent with the London Plan sustainable residential quality matrix unless, in combination with other components of the development, this would have adverse consequences upon local character and amenity.

- **the need to re-provide certain uses on the site in accordance with other policies;**

8.36 The redevelopment of town centre sites may be required to re-provide active ground floor frontages, or to make provision for replacement office space or alternative employment-generating activities in accordance with other development plan policies. Proposals involving the loss of employment space should be robustly justified in relation to the requirements set out in the Harrow Core Strategy and the other relevant policies in this DPD; this policy should not be used as the sole justification for proposals involving the loss of employment or other uses that are protected by other policies.

- **the compatibility of the uses proposed;**

8.37 The mix of uses proposed should be broadly compatible so the legitimate economic or other activities and residential occupation are not compromised by each other. Consideration against this criteria will extend to the design and layout of development, which should allow different uses to coexist effectively. Proposals should ensure that proposed commercial uses will be able to function properly, having regard to servicing requirements and the adequacy of any noise attenuation measures.

- **any other planning objectives considered to be a priority for the area.**

8.38 Harrow's Core Strategy provides objectives and policies for all of the Borough's sub areas, and further locally specific objectives may be included in conservation area supplementary planning documents and Harrow's Green Grid. Proposals for mixed use development should have regard all other relevant planning objectives and contribute to their delivery wherever possible.

8.39 Proposals for mixed use development should meet the requirements of all other relevant policies in this DPD including those which seek to protect local character and the amenity of neighbouring occupiers, and those for the preservation or enhancement of heritage assets.

8.40 Proposals that would compromise any component of this policy, or would be detrimental to the vitality and viability of town centres, will be refused.

Policy 51

Evening Economy

- A. Proposals which enhance the evening economy of town centres will be supported having regard to:
- the role and function of the centre;
 - the impact upon the amenity of residential occupiers within and adjoining the centre; and
 - any parking or traffic implications.
- B. Proposals that would compromise any component of this policy, or would be detrimental to the vitality and viability of town centres, will be refused.

Reasoned Justification

8.41 The London Plan (2011) acknowledges the value of London's night time and evening uses for entertainment and socialising, and their contribution to the London economy. Policy 4.6 *Support for and Enhancement of Arts, Culture, Sport and Entertainment Provision* of the London Plan requires boroughs to identify local clusters of evening and night time entertainment in order to address need, and to minimise the impact on other land uses taking account of cumulative effects.

8.42 Harrow's night time economy is not well developed, reflecting the range and proximity of restaurants, bars and clubs in central London. However late night return travel to Harrow can be time consuming and expensive, and as the population grows some potential exists to increase the choice and range of evening activities within the Borough. Reflecting its Metropolitan centre

status and high public transport accessibility levels, the Core Strategy (2012) properly focuses support for the development of the evening economy upon Harrow town centre. Throughout the rest of the Borough, appropriate evening uses will help to diversify town centres and should contribute positively to their overall vitality and viability, as well as providing residents with more localised options for an evening out.

8.43 Proposals which enhance the evening economy of town centres will be supported having regard to:

- **the role and function of the centre;**

8.44 The strong direction given by the Core Strategy for major new evening economy uses to locate in Harrow town centre will enable the Council and partner organisations to co-ordinate, in accordance with the London Plan, the provision of supporting public transport, policing and environmental services. Throughout the rest of the Borough, the nature and scale of proposals should be informed by the role and function of the centre in which they are located⁽⁹⁷⁾. Clubs and other entertainment uses that involve significant levels of night time activity are unlikely to be appropriate in local centres.

8.45 Proposals for evening uses in retail parades must comply with the relevant town centre policies in this DPD. Proposals should not harm the objective of those policies to maintain a critical core of retail and related daytime uses. Indeed, the dispersal of evening uses to the secondary and tertiary parades will provide the most appropriate strategy for managing the environmental impacts of such uses by avoiding more easily-reached 'saturation' levels within the Borough's suburban town centres.

- **the impact upon the amenity of residential occupiers within and adjoining the centre;**
and

8.46 Town centres in the Borough are characterised by residential uses above retail parades and have an immediate interface with the surrounding residential areas which they were designed serve. The close relationship between Harrow's town centres and residents is a strength and one which is mutually sustaining.

8.47 Many evening uses are controlled by other regulatory and, as the appropriate licensing body, the Council has published a Licensing Policy (2010) for the consideration of licence applications for public entertainment, performance, dancing and the sale/consumption of alcohol. The Council will use the planning system to consider the appropriateness of the location for the proposed use in relation to neighbouring residential premises, and to impose any necessary controls not dealt with through the licensing regime. Evening uses must be sensitively located and should not degrade the living environment of town centres or surrounding residential areas.

- **any parking or traffic implications.**

97 See paragraph XX above.

8.48 Although the Borough's town centres are well served by public transport some evening uses will nevertheless attract car-using customers, whilst other uses may lead to drop off and collection of customers by taxis. The Council will take into consideration the parking and traffic implications of proposals both in terms of highway conditions and as this may affect the amenity of neighbouring residents.

8.49 Proposals that would compromise this policy, having regard to this policy, or which would be detrimental to the vitality and viability of the centre having regard to the relevant town centre policies in this DPD, will be refused.

TRANSPORT AND WASTE 9

Development Management Policies Pre-Submission DPD

9 TRANSPORT AND WASTE

INTRODUCTION

9.1 The National Planning Policy Framework (2012) highlights the important role of transport policies in facilitating sustainable development. The London Plan (2011) and Harrow's Core Strategy (2012) provide a clear, spatial framework which links development growth to public transport accessibility and capacity. The Council is committed to working with Transport for London and other partners to target finite resources to those parts of the highway and public transport network most in need of capacity, accessibility and qualitative enhancements. Chapter six of the London Plan contains a comprehensive suite of transport policies with planning decisions criteria that will apply to development proposals in Harrow. Policy CS1 of the Core Strategy sets out Harrow's strategic approach to the provision of car parking and the development of sites in areas of low public transport accessibility.

Policy 52

Parking Standards

- A. Proposals that make on-site provision for parking will be supported where:
 - a. the number of vehicle parking spaces would not exceed the maximum London Plan standards; and
 - b. the number of cycle parking spaces would meet or exceed the minimum London Plan standards.
- B. Proposals involving parking provision that would not be consistent with the London Plan will be assessed having regard to any exceptional operational requirements, any special safety considerations and the desirability of achieving modal shift away from private car use.
- C. Proposals for car-free development within town centres will be supported where it can be demonstrated that:
 - a. there is sufficient public transport capacity to serve the trip demand generated by the development;
 - b. there would be adequate safeguards against parking on the surrounding highway network and in public car parks; and
 - c. the needs of blue badge holders would be met.
- D. Proposals that secure the delivery of car club schemes in lieu of parking provision for private vehicles will be supported.

- E. The design and layout of parking areas should be safe, secure and fit for purpose. Access to and from the public highway should maintain and where necessary improve safety and give priority to the convenience of pedestrians and cyclists.
- F. Proposals that would result in inappropriate on-site parking provision, having regard to the criteria in this policy, and those which would prejudice highway safety or the convenience of pedestrians and cyclists, will be resisted.

Reasoned Justification

9.2 Households in Harrow continue to exhibit comparatively high levels of car ownership. Core Strategy Policy CS1(R) undertakes to manage car parking provided with new development to contribute to a modal shift away from private car use to more sustainable modes. Nevertheless, it is likely that car ownership will be a preference for many residents and that this mode will continue to be a key component of economic activity and outer London inter-connectivity for the foreseeable future. The objective of this policy is to realise the transport benefits of Harrow's spatial strategy by ensuring that proposals contribute to modal shift in a manner that is appropriate to their location and which meets the transport needs of future occupiers/users of the development.

9.3 The National Planning Policy Framework sets out the considerations to be taken into account when setting parking standards for development⁽⁹⁸⁾. Transport is a matter of strategic significance to London as a whole and is therefore addressed in some detail in the London Plan. Policy 6.13 *Parking* of the London Plan sets out parking standards within ranges for various types of development, locations and levels of public transport accessibility. Reflecting the established principle that the availability of parking is a determinant of an individual's propensity to own and use a car, the standards are expressed as maxima. The London Plan also sets out minimum requirements for the provision of cycle parking.

9.4 In view of the demand generated by occupiers and users of development in outer London it is anticipated that many developers will continue to seek to provide parking as part of their proposals, and in many instances some level of vehicle parking is likely to be necessary for operational reasons. The Council will support proposals that make on site provision within the appropriate ranges set out in the London Plan for vehicle parking and which meet the minimum requirements for cycle parking. Where car parking is proposed as part of new development, the London Plan requires 1 in every 5 of the spaces to make provision for electric vehicle charging. Such provision is a vital component of the practicality of electric vehicle use and therefore necessary to increase uptake of electric vehicles in the capital.

9.5 In some instances it may be necessary to provide a number of vehicle or cycle parking spaces that is not consistent with the London Plan standards. Those proposing development not in accordance with the London Plan will be required to demonstrate robust justification for the departure from the relevant standards. When assessing the necessity of parking provision not in accordance with the London Plan, the Council will have regard to any exceptional operational requirements and any special safety considerations that are unique to the end user, the proposal

98 These are: the accessibility of the development; the type, mix and use of the development; the availability of and opportunities for public transport; local car ownership; and an overall need to reduce the use of high emission vehicles.

or the site. The Council will also take into account to the impact of excess vehicle parking, or of substandard cycle parking provision, upon the achievement of a modal shift away from private car use.

9.6 Car free developments are those that make no general on or off site provision for car parking other than that required to meet the needs of disabled persons. Such schemes are an effective means of delivering a modal shift away from private car use provided that future occupiers' ability to access their reasonable shopping, service and employment needs would not be disadvantaged, and that visitors and other users of the development (particularly in respect of non-residential uses) would not be severely disadvantaged by the absence of car parking. In Harrow, town centres provide the most suitable locations for car-free development; they provide occupiers with direct access to local shops, services and employment opportunities, and are generally served by multiple local bus services and/or a rail station for access to shops, services and employment elsewhere. The Council will therefore support proposals for car free development in town centres provided that:

- **there is sufficient public transport capacity to serve the trip demand generated by the development;**

9.7 Major proposals for car free development should undertake reasonable investigation of the availability of spare capacity on the public transport network to meet the projected trip demand of the development. In all cases, the Council will consider the likely impact of the proposal on public transport serving the town centre and will seek mitigation of any adverse impacts upon public transport capacity.

- **there would be adequate safeguards against parking on the surrounding highway network and in public car parks;** and

9.8 The objective of car free residential development is undermined if on-street space or public car parks are freely available to future occupiers. The loss of capacity intended for shoppers and employees within the town centre may also adversely impact the proper functioning of the centre, whilst increased on-street parking stress within surrounding suburban areas poses a nuisance to existing residents and can degrade the residential environment. The Council will seek to ensure that there are adequate controls in place to manage on-street space and to discourage the use of public car parks for residential parking. Car free developments will be required to enter into a Planning Obligation to restrict future occupiers' eligibility for on-street permits where there are existing controls in place, and to secure a financial contribution towards the costs of any necessary amendments to local traffic orders (including those related to public car parks) and enforcement of those orders.

- **the needs of blue badge holders would be met.**

9.9 The London Plan requires all development to make provision for the parking needs of disabled people, including those proposals that are in all other respects car-free, with a minimum requirement for at least one 'blue badge' space on site or two off site. In residential development, there should be one space for every home designed to meet the Wheelchair

Home standards and this should be provided within the curtilage of the development. The Council's Accessible Homes supplementary planning document provides further information on the parking requirements of the Lifetime and Wheelchair Homes standards.

9.10 Car clubs offer the benefit of reducing demand for individual car ownership whilst maintaining access to a car for multiple households. The extension of general car club schemes across the Borough is encouraged, and the Council will support the delivery of further car club capacity as part of new development proposals. Proportionate reductions in on-site car parking will be justified where proposals secure the delivery of car club schemes, particularly in areas of moderate and low public transport accessibility.

9.11 The design and layout of parking areas should be such that they are safe, secure and fit for purpose. All parking areas should be overlooked and well lit. Vehicle parking bays should be of appropriate dimensions and have sufficient manoeuvring space and visibility for the motorist. Cycle parking should be covered wherever possible and have convenient access to street level. Further, details on the design and layout of vehicle and cycle parking areas are set out in the Council's Residential Design Guide and Accessible Homes supplementary planning documents.

9.12 Proposals that would compromise any component of this policy will be resisted.

Policy 53

Transport Assessments and Travel Plans

- A. Proposals for major development will be required to submit a Transport Assessment to quantify the impacts of the proposal upon public transport, the highway network, the cycle network and upon conditions for pedestrians. Where multiple major developments are proposed in the area, the Council will encourage developers to co-operate to assess the cumulative impacts of the proposals upon transport.
- B. Proposals for major development will be required to satisfactorily mitigate the impacts identified in the Transport Assessment. Mitigation measures will be required to contribute to the desirability of achieving modal shift away from private car use and should include the preparation and implementation of Travel Plans.
- C. Proposals that fail to satisfactorily mitigate the transport impacts of development will be resisted.

Reasoned Justification

9.13 Harrow's Transport Study (2010) provides a strategic assessment of the impact of development growth upon the capacity and performance of the Borough's public transport services and highway network. It also looked at issues affecting cyclists and pedestrians, most notably the availability and quality of cycle parking, and the quality of the public realm. Inherently, as a strategic assessment of long term growth, the Study does not provide the level of detail required to consider the transport impacts of individual proposals and therefore recommends the use of Transport Assessment and Travel Plans. London Plan Policy 6.3 *Assessing the Effects of Development on Transport Capacity* gives effect to Transport for London guidance on the detailed requirements for transport assessments and travel plans applicable to major planning applications.

9.14 Transport assessments provide a foundation for the quantification of quantitative and qualitative impacts of development upon transport. In accordance with London Plan Policy 6.3, an assessment will be required with all major planning applications. Assessments should be proportionate to the scale of the proposal and will be required to address impacts on all relevant forms of public transport, the highway network, the strategic and local cycle network, and upon the conditions for pedestrians. In areas where there are multiple, simultaneous major development proposals, the submission of individual transport assessments each dealing with the impact of one proposal is unlikely to address legitimate concerns about potential cumulative impacts. The Council will encourage, and facilitate where possible, developers to co-operate in such circumstances to either co-ordinate their individual assessments, or produce a single combined assessment.

9.15 Having identified impacts through transport assessment, appropriate forms and levels of mitigation of those impacts should be incorporated into the proposal. In relation to the highway network mitigation may include, for example, rationalisation of existing vehicular access points, alterations to junctions, or contributions towards traffic signal co-ordination schemes. However, the total package of measures should seek to mitigate impacts in a way that contributes to the achievement of a modal shift away from car use. Mitigation measures should include the preparation and implementation of workplace and/or residential travel plans in accordance with relevant Transport for London guidance.

9.16 Proposals that would fail to properly assess and mitigate the impacts of development upon transport, in accordance with this policy, will be resisted.

Policy 54

Servicing

- A. Non-residential proposals will be required to make arrangements for servicing that maintain or improve the safety and flow of traffic on the public highway, and which protect the amenity of neighbouring occupiers. Proposals will be assessed having regard to:
- a. the relationship of the proposal with the surrounding highway network;
 - b. the availability of service roads; and
 - c. any existing safety concerns.
- B. Proposals for major development should make satisfactory arrangements for access to and servicing within the site during construction.
- C. Proposals that would be detrimental to safety, traffic flow or the amenity of neighbouring occupiers will be resisted.

Reasoned Justification

9.17 Commercial activities have varied and sometimes complex requirements for servicing by road based vehicles. Whilst many purpose-built industrial and business use estates have been designed to allow for off-road access and servicing by commercial vehicles, older premises and retail parades often have their servicing needs met on the street frontage. Attention to the servicing arrangements of new, non-residential proposals should ensure that commercial activities can be carried on in a manner that is both efficient to business and to highway and amenity interests. London Plan Policy 6.11 *Smoothing Traffic Flow and Tackling Congestion* requires boroughs to develop a package of measures which contribute to the objective of traffic flow and congestion management. The retention and effective use of existing servicing facilities, and the management of on-street servicing, will help to make the most efficient use of Harrow's finite road capacity.

9.18 Proposals for non-residential uses should therefore ensure that satisfactory servicing arrangements are in place. Proposals for sites that rely on servicing from the public highway should have no greater impact on the safety and flow of traffic than the existing use, and wherever possible should improve highway conditions. Consideration will also be given to the need to protect the amenity of neighbouring occupiers, particularly in relation to any requirement for early morning or late evening deliveries.

9.19 The adequacy of servicing arrangements for non-residential proposals will be assessed having regard to:

- **the relationship of the proposal with the surrounding highway network;**

9.20 The Council will seek to ensure that the intensity and nature of servicing arrangements, including vehicle access points, are consistent with character and role of roads within the surrounding network. Direct servicing and the formation of new service access roads from residential streets should be avoided. Wherever possible, major new non-residential proposals should have dedicated on-site service areas with a safe means of access onto a classified road.

- **the availability of service roads; and**

9.21 Many of Harrow's town centres and some residential areas have dedicated service roads which should be used in preference to the public highway. Extensions to premises should not prejudice the effective functioning of existing service roads through the loss of necessary on-site capacity or the reduction of manoeuvring space.

- **any existing safety concerns.**

9.22 Where existing uses give rise to unsafe conditions for pedestrians, cyclists or motorists, the Council will require these to be eliminated as part of the servicing arrangements of the proposal.

9.23 Site access and servicing arrangements during construction can have significant highway and amenity implications in their own right. For major development proposals, including those for residential use, the Council will seek to ensure that the temporary access and servicing

arrangements cause minimum disruption on classified roads and are safe. Developers should also comply with the Considerate Contractor Code of Practice to avoid nuisance to neighbouring occupiers during the works.

9.24 Access roads and servicing areas within the site should be located so as to minimise the potential for noise and disturbance to neighbouring occupiers. Where necessary, the Council will require the provision of acoustic fencing and suitable screening to safeguard living conditions and the visual amenity of neighbouring residential areas.

9.25 Having regard to the criteria set out in this policy, proposals that would be detrimental to safety, traffic flow or the amenity of neighbouring occupiers will be resisted.

Policy 55

Waste Management

- A. All proposals will be required to make on-site provision for the reduction of general waste, the separation of recyclable materials and the collection of organic material for composting. The on-site provision must:
- a. provide satisfactory storage volume to meet the general, recycling and organic waste material arising from the site;
 - b. ensure satisfactory access for collectors and, where relevant, collection vehicles; and
 - c. be located and screened to avoid nuisance to occupiers and adverse visual impact.
- B. Major development proposals will be required to provide a site waste management plan as part of proposals to include:
- a. setting aside land for the duration of the construction period to facilitate the sorting and storing of waste inert material; and
 - b. waste management during the lifetime of the development.

Reasoned Justification

9.26 Core Strategy Policy CS1(X) supports the objectives of sustainable waste management and requires new development to address waste management from design and construction stage through to end use, ensuring that it is managed towards the upper end of the waste hierarchy. The upper end of the hierarchy is set out in Policy 5.16 of the London Plan and comprises:

- reduce waste;

- re-use waste; and
- recycle and compost.

9.27 Harrow's arrangements for the storage and collection of domestic waste that has been segregated at source is set out in the Council's *Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties* (2008) and comprise alternative two bin and three bin systems. In accordance with the Council's Code of Practice, applicants must demonstrate that their proposal would make sufficient provision for the volume of landfill, recycling and organic waste generated by residential and non-residential occupiers of the development. Sufficient space should be made to accommodate the required number of containers in accordance with the dimensions are specified in the Council's Code of Practice together with any necessary screening. The storage arrangements should be readily accessible to future occupiers and encourage them to segregate their waste by ensuring that the recycling and composting facilities are at least equally as convenient, or more convenient, to use as containers for general waste.

9.28 For the three bin system, containers are collected from the public highway, with householders expected to wheel their bins to the roadside on collection day. The Council's Code of Practice sets out the collection access requirements for the two bin system, and further details the access and manoeuvring requirements of refuse vehicles where estate or other access roads are proposed. The design and layout of development must ensure that the arrangements for collecting general waste, recycling and organic material from the site complies with the relevant requirements of the Code of Practice.

9.29 In recent years Harrow has successfully managed the volume of general waste going to landfill and increased recycling rates across the Borough. The Council therefore remains committed to the existing systems for the segregation of waste at source. However the number of containers required can be unsightly and cause obstruction, whilst the disposal of recycling and organic waste can cause nuisance in terms of noise and odour. The design and layout of development must pay attention to the visual and amenity impacts of the on-site provision of containers. They should be located in a manner which minimises nuisance to future and neighbouring occupiers, and be suitably screened. In most residential areas, the provision of external waste management areas on forecourts or other prominent parts of the site should be avoided.

9.30 Applications for major development will be required to provide a site waste management plan to demonstrate how the proposal will contribute to the objectives of sustainable waste management. In accordance with London Plan Policy 5.18 *Construction, Excavation and Demolition Waste* the management plan should explain the provision to be made for the handling of construction, excavation and demolition waste, as well as that for the management of waste during the lifetime of the development.

COMMUNITY INFRASTRUCTURE 10

Development Management Policies Pre-Submission DPD

10 COMMUNITY INFRASTRUCTURE

INTRODUCTION

10.1 The provision of appropriate community facilities, and inclusive access to such facilities, is a prerequisite for the proper functioning of any community. They range from health services, educational premises, places of worship and community halls. The Council is committed to supporting development that meets the needs of the Borough's residents. Harrow's Core Strategy identifies infrastructure requirements that include two new schools, a new polyclinic and a performing arts space and these strategic needs will be met within the Intensification Area through the Harrow & Wealdstone Area Action Plan.

10.2 Recent years have seen the development of a new polyclinic, a faith-based school and a mosque; planning permission has also been granted for a major new community centre. As Harrow's diverse communities continue to establish, and as the provision of new schools and health facilities is decentralised, continued demand for the development of community facilities can be expected. The policies in this chapter seek to enable non-strategic community development to forward throughout the rest of Borough (beyond the Intensification Area) and to help protect existing facilities from pressure for redevelopment to competing land uses.

Community and Educational Facilities

10.3 For the avoidance of doubt, the following policies apply to places of worship, church halls, public halls, day nurseries, consulting rooms, educational establishments, museums, indoor sport facilities and emergency services. They do not apply to town centre uses, including but not limited to cinemas, theatres and nightclubs, to which other (town centre) policies apply.

Policy 56

New Community, Sport and Education Facilities

- A. Proposals for the refurbishment and re-use of existing premises for community, sport and educational facilities will be supported.
- B. Proposals for the provision of new community, sport and educational facilities will be supported where:
 - a. they are located within the community that they are intended to serve;
 - b. subject to (a) they are safe and located in an area of good public transport accessibility or in town centres; and
 - c. there would be no adverse impact on residential amenity or highway safety.
- C. New education and indoor sport development should make provision for community access to the facilities provided.
- D. Proposals for the conversion of offices to community and educational uses will be considered having regard to:
 - a. the principle of the loss of office space in accordance with Policy XX;

- b. the impact of the use upon on other legitimate uses within the building and neighbouring buildings; and
 - c. the adequacy of parking and access arrangements.
- E. Proposals that would compromise any component of this policy will be refused.

Reasoned Justification

10.4 There are currently 50 state funded primary schools and 10 secondary schools in Harrow, as well as a number of colleges and non-state funded educational establishments. In addition, Harrow's PPG 17 Study (2010) records that there are 40 community centres and halls in the Borough, although a number of these were considered by users to be in a poor condition. Although not all schools and other educational establishments make their facilities available for public use, many do and together with the existing network of community centres and halls they provide a wide range of places for residents to participate in sport and community based activities. The Council will support proposals for the refurbishment and, in the case of under-used or alternatively used facilities⁽⁹⁹⁾, the re-use of community or educational premises to meet modern expectations of the quality of provision and residents' needs for such facilities.

10.5 Proposals for the development of new community and educational facilities should achieve a high standard of design and layout, in accordance with Policy 1. The Council will support proposals for new facilities where:

- **they are located within the community that they are intended to serve;**

10.6 Facilities that are located in close proximity to the community they serve serve a number of benefits. They reduce the need to travel longer distances, encourage more sustainable modes of transport, and help to engender a sense of ownership of the facility by the community. In turn, this contributes to climate change mitigation, public health and wellbeing, and community cohesion. The location of proposals for new community and educational development should therefore have a close relationship with the resident community that they are primarily intended to serve and in areas of good public transport accessibility. Consideration will also be given to other constraints; for example the location of heritage-based museums will usually be fixed by the existing building or asset to which the museum relates.

- **subject to (a) they are safe and located in an area of good public transport accessibility or in town centres; and**

10.7 Within the area of the community that they are intended to serve, proposals should be located where they would have good access to public transport. Community and educational facilities in town centres can make a positive contribution to the vitality and viability of centres and will also help to encourage accessibility to the facility by public transport. Proposals that attract large numbers of people will be directed to locate in town centres unless there are operational reasons, or lack of suitable town centre sites, justifying development in another location.

- **there would be no adverse impact on residential amenity or highway safety.**

99 Such as park pavilions converted to commercial use.

10.8 Particular attention will be paid to the scale of the proposal and resulting intensity of use in relation to its surroundings. Proposals that would have an adverse impact on residential amenity or highway safety will be resisted. As with all other development, transport impact assessments and travel plans will be required in accordance with the London Plan.

10.9 Public halls, sports halls and school facilities (such as playing fields, performing arts facilities and indoor sports facilities) that are unused for substantial periods of time represent an inefficient use of land and in the long term risk becoming unviable. To secure efficient use of land and assets, and where possible to help address deficiencies identified in Harrow's Open Space, Sport and Recreation Study (2011), the Council will seek appropriate community access to major new halls and educational development.

10.10 Subject to economic development and town centre policies (see Chapters 7 & 8 and the London Plan) some community facilities may usefully occupy vacant office or shop premises in town centres. In so doing they may enhance town centre vitality and viability. Proposals will be considered having regard to:

- **the principle of the loss of office space in accordance with Policy XX;**

10.11 The Council recognises the need to manage the release of surplus, traditional employment floorspace and to encourage diversification of economic and related uses. To this end, criteria for the release of town centre and other offices are set out in policies in Chapter 7 of this DPD. Proposals for new community and educational uses will be considered in relation to these other policy criteria to establish the principle of whether or not the loss of office floorspace is justified.

- **the impact of the use upon on other legitimate uses within the building and neighbouring buildings;** and

10.12 Where partial conversion of an office building is proposed, including those where other floors have already been converted to alternative uses including residential, particular care will be needed to ensure that the proposed use does not conflict or 'crowd out' the other legitimate uses within the building. Some community and educational uses may compliment office uses elsewhere in the building by introducing activities outside normal office hours, or may involve only a limited degree of activity and noise during the daytime. However more intensive uses, for example those involving large numbers of visitors using the communal access/services, and the use of amplified sound is unlikely to be compatible with office (and other) occupiers within the building. The Council will seek to resist proposals that are incompatible with other legitimate uses within the building or which could reduce the attractiveness of vacant accommodation within the building to potential future office occupiers.

10.13 The same considerations will apply in relation to neighbouring buildings. Proposals should not create conditions that reduce the viability or attractiveness of neighbouring office buildings for their legitimate uses, nor be detrimental to the amenity of any neighbouring residential occupiers.

- **the adequacy of parking and access arrangements.**

10.14 Community and educational uses may generate parking and access requirements that are different in character to those of office occupiers. In accordance with Policy XX, where car parking is to be provided for the use the quantum should be within the maximum

standards set out in the London Plan, whilst spaces for blue badge holders and cyclists' provision should meet the Plan's minimum standards. Consistent with the principles of Lifetime Neighbourhoods, there should be adequate arrangements in place for disabled and mobility impaired people to enjoy equal access to the educational and community uses proposed as able bodied people. In older office buildings this may necessitate suitable adaptations. The Council's Access for All supplementary planning document will be a relevant material consideration.

10.15 For all proposals to which this policy applies, where there is a demonstrable amenity or other impact reason for doing so, the Council will exercise control over the hours of use and/or the scale of the activity through planning conditions or as part of a Planning Obligation.

10.16 Proposals that would compromise any component of this policy will be refused.

Policy 57

Retention of Existing Community, Sport and Education Facilities

- A. Proposals involving the loss of an existing community, sport or educational facility will be resisted unless:
 - a. there is no longer a need for that facility; or
 - b. there are adequate similar facilities nearby; or
 - c. the redevelopment of the site would secure an over-riding public benefit.
- B. Proposals for the redevelopment of community or educational facilities that secure enhanced re-provision on the site, or on another site which improves accessibility, will be supported.

Reasoned Justification

10.17 As well as providing for new development, it is important that a range of facilities are retained within the Borough to support and enable community activity. The Council values existing community and education facilities and will therefore resist their unjustified loss to other uses. Proposals seeking to justify the loss of a community or educational facility must robustly demonstrate either that it is surplus to requirements because it is no longer needed or because there are adequate other facilities in the area, or that the development has a public benefit which outweighs the loss of the facility. The closure of premises will not in itself constitute robust evidence that a facility is no longer needed. Where there are other facilities in the area, the quality and accessibility of those facilities will be taken into consideration to ensure that, in areas where there is a surplus, there is a managed approach to release. Unless the Borough's monitoring reports indicate a severe problem in the delivery of housing against strategic targets, residential development will not constitute a public benefit of over-riding significance as to justify the loss of a community facility.

10.18 Redevelopment of community and educational premises which involve the re-provision of facilities on the site will be supported. Similarly the redevelopment of existing premises to enable re-provision on facilities on another site will also be supported in principle. The re-provided facilities

should be at least equivalent in capacity to those that they replace. Policy ?? [*New community and education facilities*] will be applied to re-provided facilities as they apply to new community and educational development.

10.19 [deal with PPG 17 - add reference]

ENHANCING OUTDOOR SPORT FACILITIES

Policy 58**Enhancing Outdoor Sport Facilities**

- A. Proposals that would increase the capacity and quality of outdoor sport facilities, ancillary activities that support sporting activities, and those that would secure community access to private facilities, will be supported provided that:
 - a. there would be no conflict with Green Belt, Metropolitan Open Land and open space policies;
 - b. the proposal would not be detrimental to any heritage or biodiversity assets within or surrounding the site; and
 - c. there would be no adverse impact on residential amenity or highway safety.
- B. 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.

Reasoned Justification

10.20 The enhancement of existing outdoor facilities can be hugely beneficial in meeting growing needs for open space, sport and recreational. Simple improvements such as better pitch drainage and maintenance can substantially increase the number of games that can be played on the pitch, whilst modern and inclusive changing accommodation can increase the attractiveness of sporting activities to a wider cross section of the community and therefore increase participation rates. Proposals that would improve the capacity and quality of outdoor sport facilities will be supported, and the Council will particularly welcome proposals from sports clubs, educational establishments and others that help to secure community access to private sport infrastructure. Ancillary uses of facilities and pavilions are often an important income stream for sports clubs and a help to integrate them with the wider community. The Council will therefore also support appropriate, ancillary uses provided that these do not displace the facilities needed for the proper functioning of the principal sports use and subject to the policy criteria.

10.21 New buildings that provide appropriate facilities for outdoor sport and recreation do not constitute inappropriate development in the Green Belt and Metropolitan Open Land. The principal attribute of the Green Belt and Metropolitan Open Land is their openness, but in Harrow these designations often coincide with areas of special character, sites of importance for nature conservation and local heritage. In all open space, care will be needed to balance the desirability of enhanced facilities with any impacts upon openness, character, biodiversity and heritage and, wherever possible, these impacts should be mitigated. Proposals that would conflict with Green Belt, Metropolitan Open Land and local open space policies, and those that would have other unacceptable impacts, will be resisted.

10.22 Many of Harrow's open spaces are enveloped by residential property. Open space provides an attractive outlook for neighbouring occupiers, whilst surrounding residential property helps to provide natural surveillance of open space and associated premises. Enhancements that help to secure a viable future for sport and other recreational activities, and therefore help to secure the retention of open space, will be supported wherever possible. However applicants should be

sensitive to the context and setting of the site; proposed facilities and the resulting intensification that would be severely detrimental to the amenity of neighbouring residents or highway safety will be resisted.

10.23 Policy 3.19 *Sports Facilities* of the London Plan provides support for floodlighting where this would increase opportunities for participation in sport, but includes safeguards against harm to the local community and biodiversity. In Harrow, Green Belt and Metropolitan Open Land generally provide less intensively lit areas, an attribute that contributes to their non-urban character and which enables greater appreciation of the night sky. These areas also coincide with sites of biodiversity interest. Other forms of open space in the Borough are characteristically surrounded by residential property and are therefore potentially more sensitive in terms of direct amenity impacts. Proposals for floodlighting will therefore need particularly careful attention. Floodlighting should be designed and located so as to minimise its visual impact from outside of the site, and appropriate technology should be used to mitigate light spillage into the night sky and onto neighbouring property. Consideration will also be given to any management techniques that may be necessary, including control of the hours of use, to mitigate adverse impacts arising from the lighting and late evening/early morning activity on the site.

10.24 Proposals that would be at odds with open space policies, including those which afford protection to the Green Belt and Metropolitan Open Land, and those which would be detrimental to the amenity of neighbouring residents or harmful to biodiversity, will be refused.

TELECOMMUNICATIONS 11

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11 TELECOMMUNICATIONS

INTRODUCTION

11.1 Modern telecommunications systems have grown rapidly in recent years. Mobile communications are considered an integral part of the success of most business operations and individual lifestyles. They also contribute to sustainable development by allowing more flexible working practices which can mitigate the need for traditional forms of office accommodation and commuting patterns. To remain competitive, the Borough must respond positively to the needs of operators whilst ensuring that any adverse impacts of proposed new equipment are minimised and mitigated wherever possible.

11.2 The National Planning Policy Framework (2012) requires local planning authorities to keep the number of radio and telecommunications masts to a minimum, consistent with the efficient operation of the network, and seek the use of existing masts, buildings or structures wherever possible. It also requires new equipment to be sympathetically designed and camouflaged, where appropriate.

11.3 Many forms of minor telecommunications apparatus are permitted development and does not require planning permission, but in some instances are still the subject of prior approval procedures relating to siting and appearance considerations only. Permitted development is however curtailed in conservation areas and where article 4 directions are in place, and listed building consent will be required for installations on or within the curtilage of a listed building. For the avoidance of doubt, the following policy will apply to proposals for prior approval of the siting and appearance details of permitted development as well as to applications for planning permission.

Policy 59

Telecommunications

- A. Proposals for the installation of telecommunications equipment will be supported where it can be demonstrated that:
- the installation would be on an existing mast or building or, if a new mast is proposed, that it has not been not possible to find a suitable existing mast or building to meet operational requirements;
 - the siting and design of the installation would minimise its impact upon the amenity of neighbouring occupiers, the host building (where relevant) and the appearance and character of the area;
 - there would be no unacceptable impact upon areas of designated open space, heritage, landscape and biodiversity value; and
 - the installation would comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for public exposure.

- B. Proposals for major development should make provision for communal satellite and digital television receiving equipment.
- C. Proposals that would prejudice any component of this policy will be refused.

JUSTIFICATION

11.4 With continual advances in technology it is likely that demand for new telecommunications infrastructure will be sustained. It is in the interests of residents and businesses in the Borough that Harrow is provided with the necessary infrastructure which improves the quality of existing services and provides timely access to new services. The Council will work collaboratively with operators to ensure that requirements for upgraded and new infrastructure are met in a positive and timely fashion, and that early resolution of amenity and other impacts can be achieved. To this end, operators are encouraged to engage the Council as soon as possible when planning a widespread roll-out of new telecommunications infrastructure. A high priority will be afforded to the delivery of telecommunications infrastructure required by the emergency services.

11.5 The National Planning Policy Framework and associated technical guidance set out the sequential approach to be applied to development and flood risk. General telecommunications installations are classified as 'highly vulnerable' development and are therefore directed to flood zones 1 and 2. Only where the exception test can be passed should installations be located in flood zone 3.

11.6 Proposals for the installation of telecommunications equipment will be supported where it can be demonstrated that:

- **the installation would be on an existing mast or building or, if a new mast is proposed, that it has not been not possible to find a suitable existing mast or building to meet operational requirements;**

11.7 Consistent with the National Planning Policy Framework, the search for suitable sites for telecommunications installations should start with existing masts, buildings or other suitable structures. The aim is to ensure that the proliferation of new telecommunications structures is kept to a minimum, and to provide opportunities for the rationalisation or screening of equipment already installed on existing masts and buildings. Exceptionally, where an existing mast or building is so heavily equipped with existing telecommunications infrastructure that further installations would be visually harmful, and there are no other existing alternative sites, a new site will be sought.

11.8 Telecommunications equipment on schools and other premises used primarily by children can cause anxiety within the community and should be avoided. The Code of Best practice on Mobile Phone Development (2002) sets out special consultation requirements for proposals on or near to schools and colleges; relevant proposals should demonstrate that pre-application consultation has been carried out in accordance with these requirements.

- **the siting and design of the installation would minimise its impact upon the amenity of neighbouring occupiers, the host building (where relevant) and the appearance and character of the area;**

11.9 New installations should be sited and designed so as to minimise their visual impact when viewed from any surrounding residential property, upon the host building and in relation to the area's character and appearance. Proposals may offer the opportunity to reduce visual impact of existing equipment at a site, either through rationalisation, re-siting or mitigation. Examples of appropriate mitigation include shrouds, colouring and landscaping.

- **there would be no unacceptable impact upon areas of designated open space, heritage, landscape and biodiversity value;** and

11.10 Particular care will be required over the siting and design of proposals in sensitive areas. New masts and structures, but not additional equipment at existing sites, constitute inappropriate development within the Green Belt and Metropolitan Open Land and will therefore be resisted unless there are very special circumstances. Proposals in other open space and those affecting heritage assets, areas of special character and sites of importance for nature conservation should not diminish the purpose or significance of these places.

- **the installation would comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines for public exposure.**

11.11 The National Planning Policy Framework requires telecommunications proposals to be determined on planning grounds and not health safeguards if the proposal meets International Commission guidelines for public exposure. Therefore, applicants should provide confirmation that the proposed installation (on its own and where relevant in combination with any other equipment at an existing site) would comply with the guidelines.

11.12 Developers should aim to ensure that any requirements for telecommunications equipment is designed-in to proposals for new buildings. Proposals for major development will be required to make provision for communal satellite and digital television receiving equipment so as to avoid a post-development proliferation of equipment by multiple occupiers. The provision to be made within the development will be considered in relation to the relevant criteria set out in this policy, with the objective of minimising the impact of the equipment upon amenity, the appearance of the building, the character of the area and any sensitive buildings or areas.

11.13 Proposals that would prejudice any component of this policy will be refused.

IMPLEMENTATION, RESOURCES AND MONITORING 12

Development Management Policies Pre-Submission DPD

12 IMPLEMENTATION, RESOURCES AND MONITORING

INTRODUCTION

12.1 The National Planning Policy Framework (2012) re-affirms the Government's commitment to plan-led system and the role of the planning system, in partnership with the community and developers, in the delivery of sustainable development. The London Plan (2011) and Harrow's Core Strategy (2012) provide a clear spatial strategy for development in the Borough to 2026 and beyond, incorporating through the development plan process key choices about where and how the Borough's growth needs will be met, and those aspects of the local environment that are to be protected from development.

12.2 The Council encourages early engagement with those proposing development. Such engagement allows early identification and agreement of the relevant policy and site specific issues, the relevant information requirements for subsequent planning application, and calculation of the Levy charges together with any potential Planning Obligation terms. Details of Harrow's pre-application services, and fees, are published on the Council's website.

Broken link - possible circular reference Broken link - possible circular reference Broken link - possible circular reference Broken link - possible circular reference Broken link - possible circular reference Broken link - possible circular reference

Policy 60

Planning Obligations

- A. Planning Obligations which meet the required tests will be sought for:
 - a. site and proposal specific infrastructure;
 - b. on-site decentralised energy systems;
 - c. affordable housing; and
 - d. any other provisions that cannot be dealt with as a planning condition.
- B. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

Reasoned Justification

12.3 The role of the planning system in securing infrastructure delivery has increased in recent years. The Government and local communities expect local planning authorities to ensure that the additional demands placed upon infrastructure by development are identified and positively planned-for. The Community Infrastructure Levy Regulations (2010) (amended) enable local planning authorities to place a charge on development for the collective provision transport, flood, education, health, sport, recreation and open space infrastructure made necessary by growth in the area. Planning Obligations remain in force as a legal instrument for securing any site or proposal specific matters that are needed to enable planning permission to be granted. A Planning Obligation can only be used where it is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

12.4 Planning Obligations which meet these tests will be sought as a means of enabling development that would otherwise be refused. In particular, the Council will seek Obligations for:

- **site and proposal specific infrastructure;**

12.5 Planning Obligation requirements for proposal specific infrastructure can usually be identified from an assessment of development plan policies. For example, the development of a site for residential use would require, [eg children and young people's play?] whereas the development of the same site for industrial or business use would require [XXX]. Site specific infrastructure may include anything that is required to enable the site to be developed, such as a new road junction, archaeological investigation or land decontamination works. Early engagement with the Council through the pre-application service is encouraged to enable early identification of proposal and site specific matters that are likely to require a Planning Obligation.

- **on-site decentralised energy systems;**

12.6 The installation and connection requirements for decentralised energy systems are set out in the London Plan. Decentralised energy systems are a significant component of development infrastructure and assets for the mitigation of climate change. Planning Obligations will be sought where relevant to secure the implementation and management of the agreed arrangements for decentralised energy.

- **affordable housing; and**

12.7 The use of Planning Obligations to secure the appropriate quantum and mix of affordable housing in partnership with registered social landlords is well established. Proposals required to provide affordable housing in accordance with development plan policies must continue to use Planning Obligations to this end.

- **any other provisions that cannot be dealt with as a planning condition.**

12.8 In some cases there may be other detailed matters that should be provided-for in advance of granting planning permission. Wherever possible these will be addressed through the use of planning conditions. However, where application of the relevant tests indicate that a Planning Obligation is more appropriate than this mechanism, and not conditions, will be used. Such matters might include management agreements on sites of biodiversity importance, public access agreements for sports facilities or heritage assets, and provisions for the transfer of new open space with commuted sums for maintenance to the Council.

12.9 The Council intends to prepare a Planning Obligations supplementary planning document, to provide local guidance on the use of Obligations and the process to be followed. Once adopted, the SPD will be a material consideration in the application of this policy.

12.10 The heads of terms to be included in a Planning Obligation should be agreed between the Council and the developer following the submission of the planning application or, ideally, following pre-application discussions. Where the terms are agreed, and the proposal is acceptable

in all other respects, the Council will allow a period of six months from the resolution to grant planning permission for the Planning Obligation to be completed. Applications that fail to secure an appropriate Planning Obligation, to make the proposal acceptable in accordance with this and related development plan policies, will be refused.

Policy 61

Enforcement

- A. The Council will take enforcement action that is proportionate to the breach of planning control where:
 - a. there is demonstrable harm to an interest of acknowledged planning importance; and
 - b. it expedient to take action in the public interest.

Reasoned Justification

12.11 The preparation of development plans and the development management system controls development and land use in the public interest. Without compliance, these planning activities are undermined and ultimately a waste of finite resources. Effective enforcement is therefore vital to the delivery sustainable development and the maintenance of public confidence in the planning system overall. Unauthorised development and changes of use, and any breaches of planning conditions, will be considered in accordance with the relevant provisions of the development plan for Harrow and any other material considerations including the Council's supplementary planning documents.

12.12 The enforcement system is designed to mitigate harm rather than to punish contraventions. The National Planning Policy Framework re-affirms the discretionary nature of planning enforcement powers and requires local planning authorities to act proportionately in response to breaches of planning control. When deciding whether it is expedient to take action, and when assessing the proportionality of any action to be taken, the Council will have regard to Circular 10/97 *Enforcing Planning Control* and Harrow's Enforcement Policy (2012), which is available to download from the Council's website.

GLOSSARY 13

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13 GLOSSARY

Affordable Homes: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.

Allotments: Land [other than private gardens] used for the cultivation of vegetables or fruit. Allotments can either be statutory [covered by the Allotments Act 1925] or non-statutory.

Amenities: The pleasant qualities of the environment. Amenities are those facilities which can make the internal and external environment more agreeable.

Amenity Space: Space about residential development exclusively for the enjoyment of the residents. It provides a setting for the development, a usable amenity area for occupiers and protects the amenities of neighbouring properties. Usable amenity space must enjoy privacy and security and the majority of the space must not be in permanent shadow. It does not include parking spaces, hardstandings, narrow strips unsuitable for sitting out in or small front gardens, which cannot ensure privacy and security.

Authorities Monitoring Report: A report published by local planning authorities assessing progress with and the effectiveness of a Local Development Framework.

Archaeological Priority Area: An area that contains concentrations of archaeological remains, and has been identified as important by English Heritage.

Areas of Special Character: Areas in Greater London, which are considered to be important to the character, history and appearance of London as a whole.

Article 4 Direction: Under Article 4 of the Town and Country Planning (General Permitted Development) Order 1995, a local authority may [with the approval of the Secretary of State] remove specified development rights from the category of Permitted Development for a particular site.

Backland Development: Development of 'landlocked' sites behind existing buildings, such as rear gardens and private open space, usually within predominantly residential areas. Such sites often have no street frontages.

Biodiversity: The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

Biodiversity Action Plan: A strategy prepared for a local area aimed at conserving and enhancing biological diversity.

Borough Distributor Road: A road which provides a link between areas of the Borough served by Local Access Roads and the London Distributor Network.

BREEAM: Building Research Establishment Environmental Assessment Method, which owners and occupiers of buildings can use to assess the environmental impacts and costs of their operation, with a view to conserving energy and resources in the widest sense.

Brownfield Land: See definition of Previously-Developed Land.

Business Use: See definition of Use Classes Order.

Capacity [in retailing terms]: Potential spending by the public within the catchment area, with which to support existing and additional retail floorspace.

Car Clubs, Car Pools and Car Sharing Schemes: Different means of reducing mileage travelled by car. In Car Clubs, members generally live in car-free housing developments, which are situated where there is good access to public transport and town centre facilities. Members therefore do not need to own cars, but are able to hire a vehicle at preferential rates when they need one. Car Pools are similar, but a dedicated fleet is available on-site for residents of a development to hire, or an employer may provide such vehicles for employees travelling to work by non-car mode, but who need a vehicle once at work to carry out their duties. Car Sharing schemes allow employees who live in the same area to give lifts to each other to and from work.

Catchment [in retailing terms]: The geographical area from which a retail destination draws its trade. Sometimes measured in terms of 'drive-time.'

Change of Use: A change in the way that land or buildings are used. Planning permission is usually necessary in order to change from one 'use class' to another.

Character: A term relating to Conservation Areas or Listed Buildings, but also to the appearance of any rural or urban location in terms of its landscape or the layout of streets and open spaces, often giving places their own distinct identity.

Climate Change: Long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate. Often regarded as a result of human activity and fossil fuel consumption.

Combined Heat and Power [CHP]: A system that provides both electricity and heating for a building or district. Often associated with recovery of heat from the burning of household refuse, or use of hot water as a by-product of industry.

Community Infrastructure Levy: A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area

Community Facilities: Community facilities include educational facilities, youth centres, advice centres and community halls.

Community Strategy: A Strategy for promoting the economic, environmental and social well-being of an area and contributing to securing the achievement of sustainable development.

Conditions: Requirements attached to a planning permission to limit, control or direct the manner in which a development is carried out.

Conservation Area: Areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. A Conservation Area Character Appraisal is a published document defining the special architectural or historic interest that warranted the area being designated.

Conservation Area Consent: Consent required for the demolition of an unlisted building within a conservation area.

Contaminated Land: Land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.

Controlled Parking Zone: A zone where on-street parking is controlled by various means in accordance with local needs. Often this is in the form of a residents parking zone where parking is restricted to permit-holding residents during part of the day. Other measures include Pay and Display zones in town centres for shoppers and Short Stay parkers.

Conversions: Generally means the physical work necessary to change the use of a building from a particular use, classified in the Use Classes Order, to another use. Can also mean the sub-division of residential properties into self-contained flats or maisonettes.

Core Strategy: A Development Plan Document setting out the spatial vision and strategic objectives of the planning framework for an area, having regard to the Community Strategy.

Cumulative Impact: A number of developments in a locality or a continuous activity over time that together may have an increased impact on the environment, local community or economy.

Curtilage: The area normally within the boundaries of a property surrounding the main building and used in connection with it.

Cycle Network: An integrated network of both on- and off-road routes to facilitate an easier and safer journey for cyclists.

Density: In the case of residential development, the relationship between the amount of residential accommodation in a development and the site area, expressed in terms of as a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

Design Guide: A document providing guidance on how development can be carried out in accordance with good design practice often produced by a local authority with a view to retaining local distinctiveness.

Design and Access Statement: A design statement can be made at a pre-planning application stage by a developer, indicating the design principles upon which a proposal is to be based. It may also be submitted in support of a planning application.

Designated Frontage: Primary and Secondary Frontage in Harrow Metropolitan Centre and in the District Centres and the core areas of Local Centres, in which restrictions on non-retail use will apply.

Development: Development is defined under the Town and Country Planning Act 1990 as 'the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land.' Most forms of development require planning permission.

Development Plan: Documents that set out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. In the case for Harrow, it includes the Unitary Development Plan and the Regional Spatial Strategy [the London Plan]. These will be replaced by documents contained within the LDF, prepared under the Planning & Compulsory Purchase Act 2004.

Development Plan Documents: Development Plan Documents are prepared by local planning authorities and outline the key development goals of the Local Development Framework. Development Plan Documents include the Core Strategy, Development Management Policies, Site Specific Allocations and, where needed, Area Action Plans. There will also be an adopted Proposals Map, which illustrates the spatial extent of policies that must be prepared and maintained to accompany all DPDs. All DPDs must be subject to rigorous procedures of community involvement, consultation and independent examination, and adopted after receipt of the Inspector's binding report. Once adopted Development Management decisions must be made in accordance with them unless material considerations indicate otherwise. DPDs form an essential part of the Local Development Framework.

Disabled Access: The means by which disabled people [as defined in the Disability Discrimination Act 1995] can conveniently go where they want

District Centre: Shopping or groups of shops, separate from the town centre, usually containing at least one food supermarket or superstore and non-retail services such as banks, building societies and restaurants serving suburban areas or smaller settlements. They are medium-sized shopping and commercial centres providing for more than a local catchment. Some non-retail employment is usually located in these centres.

EcoHomes: An environmental assessment tool produced by Building Research Establishment Environmental Assessment Method [BREEAM] for residential housing.

Edge-of-Centre: For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Employment Areas: Sites protected for employment use [B1, B2 or B8] against loss to other uses.

Energy Efficiency: Technologies and measures that reduce the amount of electricity and / or fuel required to do the same work.

Environmental Impact Assessment and Environmental Statement: Applicants for certain types of development, usually more significant schemes, are required to submit an Environmental Statement accompanying a planning application. This evaluates the likely environmental impacts of the development, together with an assessment of how the severity of the impacts could be reduced.

Evidence Base: The information and data gathered by local authorities to justify the 'soundness' of the policy approach set out in Local Development Documents, including physical, economic, and social characteristics of an area.

Flood Plain: Generally low-lying areas adjacent to a watercourse, tidal lengths of a river or the sea, where water flows in times of flood or would flow but for the presence of flood defences.

Flood Risk Assessment: An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.

Forecourt: Area in front of a building between the building line and the back edge of the footway.

General Conformity: A Local Development Document must be in general conformity with the strategy and proposals set out in the Regional Spatial Strategy as assessed by the Regional Planning Body [in London, it is the Greater London Authority]. Normally, it would only be where an inconsistency or omission of a policy causes significant harm to the implementation of the Regional Spatial Strategy that it would be considered not to be in general conformity.

Geodiversity: The variety of rocks, fossils, minerals, landforms, soils and natural processes [e.g. Erosion] that underlie and determine the character of the natural landscape and environment.

Greater London authority [GLA] and Mayor of London: The authority for London Government set up on 3 July 2000. The Mayor has strategic responsibility for producing a range of strategies, which impinge on land-use planning. In particular, the Mayor has responsibility for producing the London Plan.

Green Belt: A national policy designation that helps to contain development and limit urban sprawl, protect and preserve the countryside and agricultural land and promote brownfield development.

Green Grid: The Green Grid comprises a series of linked open spaces and footpaths, which are accessible to members of the public. Greening measures may involve the conversion of areas of surplus highway capacity to small green spaces, implementation of traffic calming measures, traffic management and restraint, planting of vacant, derelict or other open sites and tree planting within streets.

Green Corridor: Green corridors can link housing areas to the national cycle network, town and city centres, places of employment and community facilities. They help to promote environmentally sustainable forms of transport such as walking and cycling within urban areas and can also act as vital linkages for wildlife dispersal between wetlands and the countryside.

Greenfield Land: Sites which have not been previously developed at any time.

Groundwater: An important part of the natural water cycle present underground.

Habitable Rooms: Any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition.

Health Check: Health Checks are conducted at regular intervals within Harrow Metropolitan Centre and the District Centres. They give early warning of any signs that the centre may require closer scrutiny and action to counteract any problems. Among the data collected are: pedestrian flows at various set points in the centre, vacancy levels, length of vacancy, major retail representation, environmental quality and where known, rent and commercial yield levels.

Highway: A publicly-maintained road, together with footways and verges.

Historic Parks and Gardens: Parks or gardens of special historic interest, which are graded to reflect their relative status.

Household Waste: Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and waste, which householders themselves take to household waste recovery centres.

Housing Associations or Registered Social Landlords [RSLs]: Non-profit making organisations, which use mainly Government funds to build, improve and manage the sale and rent of houses and flats.

Housing Capacity Study: An assessment of the potential of an area to provide additional housing.

Housing Needs Survey: A comprehensive assessment of the range and type of housing required in an area.

Independent Examination: The process by which a Planning Inspector may publicly examine a Development Plan Document [DPD] before issuing a report as to the soundness of the DPD. The Council may incorporate any recommended changes (if necessary) and then adopt the document or withdraw the document.

Industrial Business Park: Strategic employment site designated to accommodate research and development facilities and light industrial development [Class B1(b) and B1(c)] and which requires a higher quality environment and less heavy goods vehicle access than a Preferred Industrial Location. These two designations have been identified by the Greater London Authority.

Infrastructure: Basic services necessary for development to take place, e.g. roads, electricity, sewerage, water, education and health facilities.

Intensification Area: An area that has significant potential for increase in residential, employment and other uses through development of sites at higher densities with more mixed and intensive use.

Issues, Options and Preferred Options: The consultation stages on Development Plan Documents with the objective of gaining public consensus over proposals ahead of submission to the Government for Independent Examination.

Key Worker: Regarded as professional, white collar and manual staff providing services deemed to be vital to the local economy and the maintenance of essential services. Includes planners, teachers, junior doctors, nurses and other hospital staff.

Key Worker Housing: Regarded as housing for people in jobs that provide services deemed to be vital to the local and wider London economy and the maintenance of essential services, where there is evidence of recruitment and retention problems. A key worker is on a low to moderate income that is insufficient to allow them to access open market housing either for rent or sale and includes those employed in the public sector.

Landscape and Character: The distinct and recognisable pattern of elements that occur consistently in a particular type of landscape. It reflects particular combinations of geology, land form, soils, vegetation, land use and human settlement.

Lifetime Homes: Dwellings which are designated to a standard that allows easy adaptation to meet the needs of occupiers throughout their whole life.

Listed Building: A building of special architectural or historic interest. Listed buildings are graded I, II* or II with Grade I being the highest. Listing includes the interior as well as the exterior of the building, and any buildings or permanent structures. English Heritage is responsible for designating buildings for listing in England.

Listed Building Consent: Consent required for the demolition, in whole or in part of a listed building, or for any works of alteration or extension that would affect the character of the building.

Local Centre: A small group of shops and perhaps limited service outlets of a local nature [e.g. a suburban housing estate] serving a small catchment.

Local Development Framework: The Local Development Framework [LDF] is a non-statutory term used to describe a folder of documents, which includes all of the local planning authority's Local Development Documents. An LDF includes: Development Plan Documents and Supplementary Planning Documents, the Statement of Community Involvement, the Local Development Scheme and the Annual Monitoring Report.

Local Development Scheme: The local planning authority's time-scaled programme for the preparation of Local Development Documents that must be agreed with the Government and reviewed on an annual basis.

Local Implementation Plans: Statutory transport plans produced by London Boroughs bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.

Local Listing [or Building of Local Importance]: Locally important building valued for contribution to local scene or for local historical situations but not meriting listed building status.

Local Planning Authority: The local authority or Council that is empowered by law to exercise planning functions.

Local Transport Strategy: A five-year integrated transport strategy, prepared by local authorities in partnership with the community, seeking funding to help provide local transport projects. The plan sets out the resources predicted for delivery of the targets identified in the strategy. Local transport plans should be consistent with the policies and priorities set out in the Regional Transport Strategy as an integral part of the Regional Spatial Strategy.

London Cycle Network: A network of safe, convenient cycle routes suitable for use by all cyclists linking residential areas with all major centres of employment, retailing, leisure and with transport interchanges across London.

London Plan: The Mayor of London is responsible for producing a new planning strategy for the Capital. This replaces the previous strategic planning guidance for London [known as RPG3], issued by the Secretary of State. The London Plan is the name given to the Mayor's Spatial Development Strategy.

Major Developed Site [in Green Belt]: Sites located within the Green Belt which may be in continuing use or redundant and have a significant amount of built development.

Metropolitan Centre: A shopping or commercial centre with a catchment area which extends outside the Borough, with good public transport links to a wide variety of destinations.

Metropolitan Open Land: This form of land includes open-air facilities and accommodates open-air recreational facilities, which serve the whole of London or significant parts of it. It contains features or landscapes of historic, recreational, nature conservation or habitat interest at a Metropolitan or national level. Metropolitan Open Land can also form part of a Green Grid.

Mixed-Use: Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.

Natural Surveillance: The discouragement to wrongdoing by the presence of passers-by or the ability of people to be seen out of surrounding windows. Also known as passive surveillance [or supervision].

Nature Conservation: The protection, management and promotion of wildlife habitat for the benefit of wild species, as well as the communities that use and enjoy them.

Need [in retail terms]: The balance of supply and demand between retailers and consumers. Often expressed as personal expenditure available to support additional shops to extensions to existing shops.

Neighbourhood Parade: Those clusters of frontages serving the immediate catchment area with day-to-day essentials.

Non-Retail Use: Uses outside Class A1 of the Town and Country Planning (Use Classes) Order 1987 [as amended].

Open Space: All space of public value, including public landscaped areas, playing fields, parks and play areas, and also including not just land, but also areas of water such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation or can also act as a visual amenity and a haven for wildlife.

Open Space Deficiency Area: residential areas more than 400m from public open space.

Out-of-Centre: Development separate from town centres but not immediately adjacent to them.

Overlooking: A term used to describe the effect when a development or building affords an outlook over adjoining land or property, often causing loss of privacy.

Overshadowing: The effect of a development or building on the amount of natural light presently enjoyed by a neighbouring property, resulting in a shadow being cast over that neighbouring property.

Permitted Development: Permission to carry out certain limited forms of development without the need to make an application to a local planning authority, as granted under the terms of the Town and Country Planning (General Permitted Development) Order 1995 (as amended).

Phasing or Phased Development: The phasing of development into manageable parts, e.g. an annual rate of housing release for a large development that may need to be controlled so as to avoid destabilising housing markets and causing low demand.

Photovoltaics / Photovoltaic Cells: Conversion of solar radiation [the sun's rays] to electricity by the effect of photons (tiny packets of light) on the electrons in a solar cell, e.g. a solar-powered car or a calculator.

Planning & Compulsory Purchase Act 2004: The Act updates elements of the Town & Country Planning Act 1990. The Planning and Compulsory Purchase Act 2004 introduces a statutory system for regional planning; a new system for local planning; reforms to the Development Control and Compulsory purchase and compensation systems; and removal of crown immunity from planning controls.

Planning Condition: A condition attached to a planning permission

Planning Inspectorate: The Planning Inspectorate is the Government body responsible for the processing of planning and enforcement appeals; holding inquiries into local development Plans; listed building consent appeals; advertisement appeals; reporting on planning applications 'called in' for decision by the Secretary of State; examinations of Development Plan Documents and Statement of Community Involvement; various Compulsory Purchase Orders; rights of way cases; and cases arising from the Environmental Protection and Water Acts and the Transport and Works Act and other highways legislation are also dealt with. The work is set in agreement with Department for Transport, the Department for Communities and Local Government and where applicable, the National Assembly for Wales.

Planning Permission: Formal approval sought from a Council, often granted with conditions, allowing a proposed development to proceed. Permission may be sought in principle through outline planning applications, or be sought in detail through full planning applications.

Preferred Industrial Location: strategic industrial / warehousing locations [Use Classes B2 and B8] identified by the Greater London Authority and in the London Plan and protected for these uses in the Plan.

Previously-Developed Land or Brownfield land: Previously-developed land is that which is or was occupied by a permanent structure [excluding agricultural or forestry buildings], and any associated fixed-surface infrastructure. The definition covers the curtilage of the developed land. It does not include land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Primary Shopping Frontage: An area where retailing and the number of shops in a town centre is most concentrated.

Proposal Site: Site where the Council expects to see development in the next 15 years or where a particular use is to be safeguarded, or where the Council is currently considering alternative uses.

Protected Species: Protected species or species found to be uncommon or under threat are those species of plants and animals that are afforded legal protection, e.g. under the European Union Birds Directive and Habitats Directive. Priority species are identified in The UK Biodiversity Action Plans and the London Action Plans. Some of the species included within the scope of national, regional and local Biodiversity Action Plans may not have statutory protection.

Public Realm: Those parts of a village, town or city [whether publicly or privately owned] available, for everyone to use. This includes streets, squares and parks.

Public Transport Accessibility Levels [PTAL]: An assessment of the proximity to, and regularity of public transport services ranked on a scale.

Recycling: The reprocessing of waste either into the same product or a different one.

Regeneration: An holistic approach to improving geographical areas which experience one or more of the following: high unemployment, poor housing, social exclusion, environmental decline, high incidence of ill health, compared to the surrounding areas. Problems are tackled with an inter-disciplinary and inter-agency approach.

Renewable Energy: Renewable energy is energy flows that occur naturally and repeatedly in the environment, e.g from the wind, water flow, tides or the sun.

Repairs Notice [as served on a listed building and buildings in a conservation area]: There are three types of notice that the Council can serve on the owner of a listed building, i.e. Under Sections 48, 54 and 76 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 54 and 76 can be used in urgent cases to make a listed building wind and weather-tight. The Council states the minimum work required and may [if the owner does not do so] carry out the work itself and recover the costs from the owner. This Section can also apply in special circumstances to unlisted buildings in conservation areas. A Repairs Notice under Section 48 can be served in respect of a statutory listed building which is derelict.

Retail Floorspace: Total floor area of the property that is associated with all retail uses. Usually measured in square metres. May be expressed as a net figure [the sales area] or in gross [including storage, preparation and staff areas].

Retail Impact: The potential effects of proposed retail development upon existing shops.

Retail Warehouses: Large, usually out-of-town or out-of-centre units selling non-food items such as DIY, furniture, leisure and household goods.

Saved Policies / Saved Plan: Policies within Unitary Development Plans that are saved for a time period during replacement production of Local Development Documents.

Secondary Shopping Frontage: A retailing area, secondary to the primary shopping frontage, that provides greater opportunities for a diversity of uses.

Section 106 Agreement [or Planning Obligation]: A legal agreement under Section 106 of the Town & Country Planning Act 1990. Section 106 agreements are legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken.

Sequential Approach / Sequential Test: A planning principle that seeks to identify, allocate or develop certain types or locations of land before others, e.g. Brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites. For housing, development on greenfield sites will only be considered if there are no opportunities for developing previously-developed land. For retail, town centre locations are the first preference. If no suitable sites are available, then edge-of-centre sites are the next preference, and only if there are no suitable sites in these locations should out-of-centre sites be considered.

Shared Ownership: Housing schemes provided on the basis of shared equity [i.e. The occupiers part-buy, part-rent the property], allowing the occupiers to buy what they can afford with the flexibility to increase the degree of ownership if they so wish.

Site of Special Scientific Interest: A site identified under the Wildlife and Countryside Act 1981 [as amended by the Countryside and Rights of Way Act 2000] as an area of special interest by reason of any of its flora, fauna, geological or physiographical features [generally, plants, animals, and natural features relating to the Earth's structure].

Soundness: A Development Plan Document is considered 'sound' if it is based upon good evidence and has been prepared in accordance with all the necessary procedures including the measures set out in the authority's Statement of Community Involvement.

Spatial Development: Changes in the distribution of activities in space and the linkages between them in terms of the use and development of land.

Spatial Planning: Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. This will include policies which can impact on land use by influencing the demands on, or needs for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.

Spatial Vision: A brief description of how the area will be changed at the end of a Plan period.

Special Needs Housing: Housing to meet the needs of groups of people who may be disadvantaged, such as the elderly, the disabled, students, young single people, rough sleepers, the homeless, those needing hostel accommodation, key workers, travellers and occupiers of mobile homes and houseboats.

Statement of Community Involvement: The Statement of Community Involvement sets out the processes to be used by the local authority in involving the community in the preparation, alteration and continuing review of all Local Development Documents and Development Management decisions. The Statement of Community Involvement is an essential part of the Local Development Framework.

Statutory: Required by law [statute], usually through an Act of Parliament.

Statutory Body: A Government-appointed body set up to give advice and be consulted for comment upon Development Plans and planning applications affecting matters of public interest. Examples of statutory bodies include: English Heritage, Environment Agency, Health & Safety Executive and Sport England.

Statutory Undertakers / Statutory Utilities: Bodies carrying out functions of a public character under a statutory power. They may either be in public or private ownership such as Post Office, Civil Aviation Authority, the Environment Agency or any water undertaker, any public gas transporters, supply of electricity, etc.

Sui Generis: A building or land use in a class of its own unrelated to any other use class within the Town and Country Planning (Use Classes Order) 1987 [as amended].

Supplementary Planning Document: A Supplementary Planning Document is a Local Development Document that may cover a range of issues, thematic or site specific, and provides further detail of policies and proposals in a 'parent' Development Plan Document.

Sustainability Appraisal [including Environmental Appraisal]: An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

Sustainable Design and Construction: Design and construction in accordance with environmentally sound principles of building, material, energy and water use. Such a building would minimise energy use making the most of natural light, solar gain and natural ventilation; minimise pollution through the use of non-polluting materials; and make a positive contribution to the ecology of the surrounding area through the use of turf roofs, judicious planting and landscaping. Use may also be made of renewable energy technologies, such as photovoltaics and solar water heating, grey water recycling and recycled building materials.

Sustainable Development: A widely-used definition drawn up by the World Commission on Environment and Development in 1987: 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'

Sustainable Drainage Systems: A range of techniques that reduce flood risk and improve water quality by reducing the rate and quantity, and improving the quality of surface water run-off.

Sustainable Travel / Sustainable Transport: Often meaning walking, cycling and public use of transport [and in some circumstances 'car sharing'], which is considered to be less damaging to the environment and which contributes less to traffic congestion than one-person car journeys.

Town Centre: The commercial or geographical centre or core area of a town.

Town Centre Management: A forum of traders, businesses and local authorities to agree and undertake co-ordinated management and care the retail area, promote trade and funding improvements.

Town Centre Uses: A diverse range of town centre uses including, retail, social, leisure and cultural, housing, employment and other uses.

Town Centres: Includes a range of different-sized centres, including market and country towns, traditional suburban centres, and quite often, the principal centre[s] in a local authority's area.

Traffic Calming: A form of traffic management which involves implementing a set of measures aimed at making vehicular traffic more 'friendly' to the surrounding area and to pedestrians, cyclists, etc usually by slowing traffic down and aiming to displace through traffic to appropriate roads around the 'calmed' area, or controlling its passage through the area.

Traffic Management: Measures undertaken to improve the environment or road safety by controlling the roadspace. Measures range from controlling road junctions and regulating the times and places for parking to the reallocation of available roadspace to favour buses, cyclists and / or pedestrians.

Traffic Restraint: The implementation of comprehensive measures to dissuade drivers from using their cars for the whole or part of their journeys, and to use public transport or other means instead. There are various methods, e.g. Parking restraint [restricting the amount of total parking available all the time, or at certain times in a town centre]; road pricing [charging each vehicle for entering an area by means of various automatic charging methods]; pedestrianisation and vehicle bans.

Travel Plan: A travel plan aims to promote sustainable travel choices, e.g. cycling as an alternative to single occupancy car journeys that may impact negatively on the environment, congestion and road safety. Travel Plans can be required when granting planning permission for new developments.

Tree Preservation Order: A mechanism for securing the preservation of single or groups of trees of acknowledged amenity value. A tree subject to a Tree Preservation Order may not normally be topped, lopped or felled without the consent of the local planning authority.

Urban Design: The art of making places. It involves the design of buildings, groups of buildings, spaces and landscapes, in villages, towns and cities, to create successful development.

Urban Heat Island Effect: Where higher ambient air temperatures are experienced after sunset in comparison with rural areas. The urban heat island is traditionally described as the volume of air within cities below roof level that possesses higher temperatures than the surrounding rural air at a similar height.

Use Classes Order: The Town and Country Planning (Use Classes) Order 1987 [as amended] puts uses of land and buildings into various categories.

Viability: In terms of retailing, a centre that is capable of commercial success.

Vitality: In terms of retailing, the capacity of a centre to grow or develop its likeliness and level of activity.

Waste: Waste is any material or object that is no longer wanted and requires disposal. If a material or object is re-usable, it is still classed as waste if it has first been discarded.

Water Conservation: Minimising or reducing water consumption through measures such as water recycling, water efficient appliances, [e.g. Showers, low-flush toilets and spray taps] and Sustainable Drainage Systems.

Wildlife Corridor: Strips of land, e.g. along a hedgerow conserved and managed for wildlife, usually linking more extensive wildlife habitats.

Windfall Site: A site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of a plan. Most 'windfalls' are referred to in a housing context. They tend to be very small sites for one or a small number of homes.

Schedule 1 - Town Centre Frontages

14

Development Management Policies Pre-Submission DPD

14 Schedule 1 - Town Centre Frontages

14.1 This schedule contains the addresses of the designated shopping frontages in Harrow as shown on the Proposals Map. It should be noted that in the event of any changes to address etc, the extent of the frontages as illustrated on the Proposals Map will have primacy.

Harrow Metropolitan Centre

Primary Frontages	Secondary Frontages
269 -339 Station Road	203-267 Station Road
314 - 326 Station Road	1-8 Central Parade
1 - 59 St Anns Road	341-385 Station Road
2 - 86 St Anns Road	140-190 Station Road
Kiosks St Anns Road	276-312 Station Road
St Anns Centre Internal Malls	328-380 Station Road
St Georges Centre Internal Malls (Ground Floor)	2-36 College Road
	17-51 College Road
	63-77 College Road

Edgware Major Centre

Primary Frontages	Secondary Frontages
None	1-19 Whitchurch Lane
	1-11 Lanson House, Whitchurch Lane
	81-103 High Street
	1-4 Handel Parade

District Centres**Burnt Oak**

Primary Frontages	Secondary Frontages
53 -127 Burnt Oak Broadway	129 - 195 Burnt Oak Broadway

Kingsbury

Primary Frontages	Secondary Frontages
None	704 - 740 Kenton Road

North Harrow

Primary Frontages	Secondary Frontages
None	1-9 Broadway Parade
	17-22 Broadwalk
	33-49 Station Road
	51-69 Station Road
	352-378 Pinner Road
	73-87 Station Road
	60-70 Station Road
	34-56 Station Road
	435 Pinner Road
	340-348 Pinner Road
	13-15 Broadwalk, Pinner Road
	23-28 Broadwalk, Pinner Road
	493-539 Pinner Road

Pinner

Primary Frontages	Secondary Frontages
2-36 High Street	6-12 Love Lane
1-27 High Street	1-2 Chapel Lane
Barters Walk	36-60 Bridge Street
Bishops Walk	69-95 Bridge Street
2-12 Bridge Street	100-120 Marsh Road
18-34 Bridge Street	185-211 Marsh Road
9-67 Bridge Street	1-5 Station Approach
1-9 Red Lion Parade	38-52 High Street
1-19 Love Lane	29-39 High Street
2-4 Love Lane	

Rayners Lane

Primary Frontages	Secondary Frontages
411-475 Alexandra Avenue	399-409 Alexandra Avenue
297-357 Rayners Lane	420-472 Alexandra Avenue
320-376 Rayners Lane	378-426 Rayners Lane
	377-433 Rayners Lane
	2-26 Village Way East
	1-21 Village Way East

South Harrow

Primary Frontages	Secondary Frontages
218-330 Northolt Road (excluding 230b,c,d)	297-347 Northolt Road
223-233 Northolt Road	

Development Management Policies Pre-Submission DPD

Primary Frontages	Secondary Frontages
235-271 Northolt Road	
273-295 Northolt Road	

Stanmore

Primary Frontages	Secondary Frontages
14-82 The Broadway	1-12 Buckingham Parade
Sainsbury, The Broadway	1-11 Stanmore Hill
	29-55 The Broadway
	1-11 The Broadway
	2-36 Church Road
	1-33 Church Road

Wealdstone

Primary Frontages	Secondary Frontages
19-71 High Street	1-13 Masons Avenue
The Sam Maguire P.H.	1-17B High Street
26-66 High Street	1-15B Headstone Drive
The Case is Altered P.H.	Post-Office - 32 Headstone Drive
	2-22 High Street
	73-111b High Street
	1-2 Church Parade
	86-112 High Street
	2-14 Canning Road

Local Centres

Belmont

Designated Frontage
Belmont Hotel (P.H.)
15-27 Belmont Circle
404-412 Kenton Lane.
498-508 Kenton Lane
397-405 Kenton Lane
3-9 Warwick Parade
1-5 Station Parade

Harrow Weald

Designated Frontage
323-461 High Road
330-338 High Road
350-352 High Road
364 High Road (Homebase)
2-10 Weald Lane

Hatch End

Designated Frontage
246-420 Uxbridge Road
381-389 Uxbridge Road
407-521 Uxbridge Road

Kenton

Designated Frontage
136-204 Kenton Road

Queensbury

Designated Frontage
246-272 Streatfield Road
179-219 Streatfield Road
3-11 Queensbury Circle Parade
381-451 Honeypot Lane

Sudbury Hill

Designated Frontage
137-169 Greenford Road
142-172 Greenford Road

Neighbourhood Parades

14.2 A number of neighbourhood parades have been identified throughout the Borough, and are designated on the Proposals Map www.harrow.gov.uk/ldf and listed in Appendix ?? Of the Harrow Core Strategy 2012.

Town Centre Hierarchy

14.3 Appendix ?? of the Harrow Core Strategy 2012 identifies the hierarchy of town centres (Metropolitan, Major, District and Local) in Harrow.

Schedule 2 - Method for Applying Changes of Use of Shops policy **15**

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15 Schedule 2 - Method for Applying Changes of Use of Shops policy

General Principles

15.1 The Council will adopt the following procedure to calculate the percentage of change to the retail frontage and the relative proportions of frontage in retail and in non-retail use. Only premises within the parades identified in this schedule and shown on the Proposals Map as either Primary, Secondary (Metropolitan or District Centre) or Designated (Local Centre) frontage will be included in the calculation. Premises will be categorised according to their authorised use.

15.2 The retail frontage for each parade or centre will be made up from all those uses that fall within Class A1 of the Town and Country Planning (Use Classes) Order 1987 (U.C.O.).

15.3 The non-retail frontage will be made up of the following uses:

1. Premises in Use Class A2 of the UCO.
2. Premises in Use Class A3 of the UCO
3. Premises in Sui Generis use which form part of the identified shopping frontage including for example launderette's, taxi offices, car showrooms, amusement centres, driving school offices and premises for the hire of cars; and
4. B1 offices that occupy premises that form a continuous part of the identified shopping frontage.

15.4 Premises within use classes not identified in 15.2 or 15.3 will be excluded from calculation, i.e they will be treated as neither retail nor non-retail frontage. These include libraries, public halls, petrol filling stations, community buildings and purpose built offices.

15.5 Alleyways, gaps in the frontage and access ways to rear premises of first floors are excluded from the calculation.

15.6 Vacant premises will be included in the calculation according to their authorised use. Premises with valid unimplemented planning permission for non-retail use will count as non-retail.

15.7 Where planning consent is granted for a change of use of any premises for non-retail use subject to the completion of a legal agreement, the premises will be classified as non-retail for the purpose of the calculation within the period specified for completion of that agreement.

15.8 Public houses will be included in the calculation of non-retail frontage only if they form part of a continuous shopping frontage.

15.9 When new frontage is created through new build or redevelopment it will be added to the schedule listed in part 4 below and incorporated into the calculation of the retail/non-retail frontage.

Methodology for measuring

15.10 The measurement for each shopfront is that distance across the front of the premises facing onto an identified street frontage. If the frontage is irregular in shape then it is broken down into measurable sections.

15.11 Pilasters between shops in parades are divided equally between the adjoining premises.

15.12 Return frontages will only be included where:-

1. The return is onto a street frontage included in the identified shopping frontage (see Schedule 1); or
2. The return includes a display window, shop doorway or service till and clearly forms a part of the shopping area.

Formula for calculation

15.13 The percentage for non retail frontage of a centre can be calculated as follows:- $100/\text{Total Frontage} \times \text{Total Non Retail Frontages}$

15.14 EACH SHOPFRONT HAS BEEN MEASURED BY OFFICERS OF THE COUNCIL. THE CLASSIFICATION OF PREMISES, DETAILS OF INDIVIDUAL FRONTAGE LENGTHS AND THE CURRENT PERCENTAGE OF NON-RETAIL FRONTAGE IN THE METROPOLITAN, DISTRICT AND LOCAL CENTRES IS AVAILABLE FROM THE COUNCIL UPON REQUEST.

Schedule 3: Harrow Land Drainage Byelaws 16

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16 Schedule 3: Harrow Land Drainage Byelaws

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LONDON BOROUGH OF HARROW LAND DRAINAGE BYELAWS

16.1 The London Borough of Harrow under and by virtue of the powers and authority vested in them by section 66 of the Land Drainage Act 1991, do hereby make the following Byelaws which are considered necessary for securing the efficient working of the drainage system in their District, so far as may be necessary for the purpose of preventing flooding or remedying or mitigating any damage caused by flooding: -

1. Commencement of Byelaws

16.2 These Byelaws shall come into operation at the expiration of one month beginning with the day on which they are confirmed by the Minister.

2. Application of Byelaws

- a. These Byelaws shall have effect in the Area;
- b. the watercourses referred to in Byelaws 4 to 7 and 9 to 17 are watercourses which are for the time being vested in or under the control of the Council.

3. Control of Sluices etc

16.3 Any person having control of any sluice, slacker, floodgate, lock, weir, dam, pump, pumping machinery or other structure or appliance for introducing water into any watercourse in the Area or for controlling or regulating or affecting the flow of water in, into or out of any watercourse shall use and maintain such sluice, slacker, floodgate, lock, weir, dam, pump, pumping machinery, structure or appliance in accordance with such reasonable directions as may from time to time be given by the Council with a view to the prevention of flooding in the Area.

4. Control of Introduction of Water and Increase in Flow or Volume of Water

16.4 No person shall, without the previous consent of the Council, for any purposes, by means of any channel, siphon, pipeline or sluice or by any other means whatsoever, introduce any water into the Borough or, whether directly or indirectly, increase the flow or volume of water in any watercourse in the Borough.

5. Fishing Nets and Angling

16.5 No person shall angle or set any nets or engines for the catching or keeping of fish in any watercourse in such a manner as to cause damage to or endanger the stability of the bank of the watercourse or to affect or impede the flow of water.

16.6 In this Byelaw "nets" includes -

- a. a stake net, bag net or keep net;
- b. any net secured by anchors and any net, or other implement for taking fish, fixed to the soil or made stationary in any other way;
- c. any net placed or suspended in any inland or tidal waters unattended by the owner or a person duly authorised by the owner to use it for fish, and any engine, device, machine or contrivance, whether floating or otherwise, for placing or suspending such a net or maintaining it in working order or making it stationary.

6. Diversion or Stopping up of Watercourses

16.7 No person shall, without the previous consent of the Council, take any action, or knowingly permit or aid or abet any person to take any action to stop up any watercourse or divert or impede or alter the level of or direction of the flow of water in, into or out of any watercourse.

7. Detrimental Substances not to be Put into Watercourses

16.8 No person shall, so as directly or indirectly to obstruct, impede or interfere with the flow of water in, into or out of any watercourse or so as to damage the bank -

- a. discharge or put or cause or permit to be discharged or put or negligently or wilfully

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- i. cause or permit to fall into any watercourse any object or matter of any kind whatsoever
 - ii. whether solid or liquid;
- b. allow any such object or matter as is referred to in sub-paragraph (a) of this Byelaw to
- i. remain in proximity to any watercourse in such manner as to render the same liable to
 - ii. drift or fall or be carried into any watercourse.

16.9 Provided that nothing in this Byelaw shall be deemed to render unlawful the growing or harvesting of crops in accordance with normal agricultural practice.

8. Lighting of Fires

16.10 No person shall light or cause or permit to be lighted or commit any action liable to cause to be lighted any fire on any land adjoining the watercourse where such action is liable to set on fire the peat land forming the banks of the watercourse or any trees, willows, shrubs, weeds, grasses or any other vegetable growths growing on land forming the banks of the watercourse.

9. Notice to Cut Vegetable Growths

16.11 Any person having control of any watercourse shall, upon the receipt of a notice served on him by the Council requiring him so to do, cut down and keep cut down all trees, willows, shrubs, weeds, grasses, reeds, rushes or other vegetable growths growing in or on the bank of a watercourse, within such reasonable time as may be specified in the notice, and shall remove such trees, willows, shrubs, weeds, grasses, reeds, rushes or other vegetable growth from the watercourse immediately after the cutting thereof.

16.12 Provided that, where a hedge is growing on the bank of a watercourse, nothing in this Byelaw shall require more than the pruning of the hedge so as to prevent it from growing over or into the watercourse, and the removal of the resultant cuttings.

10. No Obstructions within 5 Metres of the Edge of the Watercourse

16.13 No person without the previous consent of the Council shall erect any building or structure, whether temporary or permanent, or plant any tree, shrub, willow or other similar growth within 5 metres of the landward toe of the bank where there is an embankment or wall or within 5 metres of the top of the batter where there is no embankment or wall, or where the watercourse is enclosed within 5 metres of the enclosing structure.

11. Repairs to Buildings

16.14 The owner of any building or structure in or over a watercourse or on the banks thereof shall, upon receipt of a notice from the Council that because of its state of disrepair -

- a. the building or structure is causing or is in imminent danger of causing an obstruction to the flow of the watercourse,
- b. the building or structure is causing or is in imminent danger of causing damage to the bank of the watercourse,

carry out such reasonable and practicable works as are specified in the notice for the purpose of remedying or preventing the obstruction or damage as the case may be within such reasonable time as is specified in the notice.

12. Control of Vermin

16.15 The occupier of any bank of a watercourse or any part thereof shall, upon being required by the Council by notice, within such reasonable time as may therein be specified, take such steps as are specified in the notice, being such steps as the Council consider necessary and practicable for preventing the bank from becoming infested by rabbits, rats, coypu, foxes and moles or any other wild mammal not being an animal listed in Schedule 5 or Schedule 6 to the Wildlife and Countryside Act 1981, but excluding the water vole from such control.

13. Damage by Animals to Banks

16.16 All persons using or causing or permitting to be used any bank of any watercourse for the purpose of grazing or keeping any animal thereon shall take such steps including fencing as are necessary and reasonably practicable and shall comply with such reasonable directions as may from time to time be given by the Council to prevent the bank or the channel of the watercourse from being damaged by such use.

16.17 Provided that nothing in this Byelaw shall be deemed to affect or prevent the use of, for the purpose of enabling animals to drink at it, any place made or to be made or constructed as approved by the Council.

14. Vehicles not to be Driven on Banks

16.18 No person shall use or drive or permit or cause to be used or driven any cart, vehicle or implement of any kind whatsoever on, over or along any bank of a watercourse in such manner as to cause damage to such bank.

15. Banks not to be Used for Storage

16.19 No person shall use or cause or permit to be used any bank of any watercourse for the purpose of depositing or stacking or storing or keeping any rubbish or goods or any material or things thereon in such a manner as by reason of the weight, volume or nature of such rubbish, goods, material or things causes or is likely to cause damage to or endanger the stability of the bank or channel of the watercourse or interfere with the operations or access of the Council or the right of the Council to deposit spoil on the bank of the watercourse.

16. Not to Dredge or Raise Gravel, Sand etc

16.20 No person shall without the previous consent of the Council dredge or raise or take or cause or permit to be dredged or raised or taken any gravel, sand, ballast, clay or other material from the bed or bank of any watercourse.

17. Fences, Excavations, Pipes, etc

16.21 No person shall without the previous consent of the Council -

- a. place or affix or cause or permit to be placed or affixed any gas or water main or any pipe or appliance whatsoever or any electrical main or cable or wire in or over any watercourse or in, over or through any bank of any watercourse;
- b. cut, pare, damage or remove or cause or permit to be cut, pared, damaged or removed any turf forming part of any bank of any watercourse, or dig for or remove or cause or permit to be dug for or removed any stone, gravel, clay, earth, timber or other material whatsoever

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forming part of any bank of any watercourse or do or cause or permit to be done anything in, to or upon such bank or any land adjoining such bank of such a nature as to cause damage to or endanger the stability of the bank;

- c. make or cut or cause or permit to be made or cut any excavation or any tunnel or any drain, culvert or other passage for water in, into or out of any watercourse or in or through any bank of any watercourse;
- d. erect or construct or cause or permit to be erected or constructed any fence, post, pylon, wall, wharf, jetty, pier, quay, bridge, loading stage, piling, groyne, revetment or any other building or structure whatsoever in, over or across any watercourse or in or on any bank thereof;
- e. place or fix or cause or permit to be placed or fixed any engine or mechanical contrivance whatsoever in, under or over any watercourse or in, over or on any bank of any watercourse in such a manner or for such length of time as to cause damage to the watercourse or banks thereof or obstruct the flow of water in, into or out of such watercourse.

16.22 Provided that this Byelaw shall not apply to any temporary work executed in an emergency but a person executing any work so expected shall, as soon as practicable, inform the Council in writing of the execution and of the circumstances in which it was executed and comply with any reasonable directions the Council may give with regard thereto.

18. Interference with Sluices

16.23 No person shall without lawful authority interfere with any sluice, slacker, floodgate, lock, weir, dam, pump, pumping machinery or any other structure or appliance for controlling or regulating the flow of water in, into or out of a watercourse.

19. Damage to Property of the Council

16.24 No person shall interfere with or damage any bank, bridge, building, structure, appliance or other property of or under the control of the Council.

20. Defacement of Notice Boards

16.25 No person shall deface or remove any notice Board, notice or placard put up by the Council.

21. Obstruction of the Council and Officers

16.26 No person shall obstruct or interfere with any member, officer, agent or servant of the Council exercising any of his functions under the Act or these Byelaws.

22. Savings for Other Bodies

16.27 Nothing in these Byelaws shall -

- a. conflict with or interfere with the operation of any Byelaw made by the Environment Agency or an internal drainage board or of any navigation, harbour or conservancy authority but no person shall be liable to more than one penalty or in the case of a continuing offence more than one daily penalty in respect of the same offence;
- b. restrict, prevent, interfere with or prejudice the exercise of any statutory rights or powers which are now or hereafter may be vested in or exercised by -

- i. any public utility undertaking carried on by a local authority under any Act or under any Order having the force of an Act,
 - ii. the undertakings of the Environment Agency and of any water undertaker or sewerage undertaker;
 - iii. any public gas transporter within the meaning of part 1 of the Gas Act 1986;
 - iv. any navigation, harbour or conservancy authority;
 - v. any person who acts as the operator of a relevant railway asset, with respect to the construction, use or maintenance and repair of any such asset, or the free, uninterrupted and safe use of any such asset and the traffic (including passengers thereof);
 - vi. any local authority;
 - vii. any highway authority for the purposes of the Highways Act 1980 (as amended by any subsequent enactment) in relation to any highway whether or not maintainable at public expense;
 - viii. any undertaking engaged in the operation of a telecommunications system;
 - ix. a relevant airport operator within the meaning of Part V of the Airports Act 1986;
 - x. the Civil Aviation Authority and any subsidiary thereof;
 - xi. the British Waterways Board;
 - xii. the Coal Authority;
- c. restrict, prevent, interfere with or prejudice any right of a highway authority to introduce into any watercourse surface water from a highway, for which it is the highway authority;
 - d. restrict, prevent, interfere with or prejudice any right of a licence holder within the meaning of Part 1 of the Electricity Act 1989 to do anything authorised by that licence or anything reasonably necessary for that purpose;
 - e. affect any liability arising otherwise than under or by reason of these Byelaws.

23. Saving for Crown Lands

16.28 Nothing in these Byelaws shall operate to prevent the removal of any substance on, in or under (or the erection of any structure, building or machinery or any cable, wire or pipe on, over or under) lands belonging to Her Majesty in right of the Crown by any person thereunto authorised by the Crown Estate Commissioners.

24. Arbitration

- a. Where by or under Byelaws 3, 9, 11, 12, 13 or 17 any person is required by a notice in writing given by the Council to do any work to the satisfaction of the Council or to comply with any directions of the Council, he may within 21 days after the service of such notice on him give to the Council a counter-notice in writing objecting to either the reasonableness of or the necessity for such requirement or directions, and in default of agreement between such person and the Council the dispute shall, when the person upon whom such notice was served is a drainage or local authority be referred to the Minister whose decision shall be final, and in any other case shall be referred to the arbitration of a single arbitrator to be appointed in default of agreement by the President of the Institution of Civil Engineers on the application of either party. Where such a counter-notice has been given to the Council the operation of the notice shall be suspended until either agreement has been reached or the dispute has been determined by arbitration in accordance with the provisions of this Byelaw;
- b. Where by or under these Byelaws any person is required by a notice in writing given by the Council to do any work to the satisfaction of the Council or to comply with any directions of the Council and any dispute subsequently arises as to whether such work has been executed

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or such directions have been complied with, such dispute if it arises between a drainage authority or local authority and the Council shall be referred to the Minister whose decision shall be final, and in any other case shall be referred to the arbitration of a single arbitrator to be appointed in default of agreement by the President of the Institution of Civil Engineers on the application of either party;

- c. Where by or under Byelaws 6, 10, 16 or 17 any person is required to refrain from doing any act without the consent of the Council such consent shall not be unreasonably withheld and may be either unconditional or subject to such reasonable conditions as the Council may consider appropriate and where any dispute arises as to whether in such a case the consent of the Council is being unreasonably withheld, or as to whether any conditions subject to which consent is granted are unreasonable, such dispute shall if it arises between a drainage authority or local authority and the Council be referred to the Minister whose decision shall be final, and in any other case such dispute shall be referred to the arbitration of a single arbitrator to be appointed in default of agreement by the President of the Institution of Civil Engineers on the application of either party.

25. Notices

16.29 Notices and any other documents required or authorised to be served or given under or by virtue of these byelaws shall be served or given in the manner prescribed by section 71 of the Act.

26. Limitation

- a. Nothing in these Byelaws shall authorise the Council to require any person to do any act, the doing of which is not necessary for securing the efficient working of the drainage system of the district, so far as may be necessary for the purpose of preventing flooding or remedying or mitigating any danger caused by flooding, or to refrain from doing any act, the doing of which does not adversely affect the efficient working of the drainage system of the district, so far as may be necessary for the purpose of preventing flooding or remedying or mitigating any damage caused by flooding.
- b. If any conflict arises between these Byelaws and
- i. the Land Drainage Act 1994 (which relates to the Council's duties with respect to the environment), or
- ii. the Conservation (Natural Habitats, etc) Regulations 1994⁽¹⁰⁰⁾

the said Act and the said Regulations shall prevail.

27. Interpretation

16.30 In these Byelaws, unless the context otherwise requires, the following expressions shall have the meaning hereby respectively assigned to them, that is to say:-

"*the Act*" means the Land Drainage Act 1991;

"*Animal*" includes any horse, cattle, sheep, deer, goat, swine, goose or poultry;

"*Bank*" includes any bank, cross bank, wall or embankment adjoining or confining or constructed for the purpose of or in connection with any watercourse and includes all land between the bank and the low water mark or level of the water in the watercourse as the case may be and where there is no such bank, cross bank, wall or embankment includes the top edge of the batter enclosing the watercourse;

"*Consent of the Council*" means the consent of the Council in writing signed by a proper officer of the Council;

"*Council*" means the London Borough of Harrow Council;

"*Area*" means the area under the jurisdiction of the Council;

"*The Minister*" means the Minister of Agriculture, Fisheries and Food;

"*Occupier*" means in the case of land not occupied by any tenant or other person the person entitled to the occupation thereof;

"*Owner*" includes the person defined as such in the Public Health Act 1936;

"*Relevant railway asset*" means

(a) a network which was transferred, by virtue of a transfer scheme made under Section 85 of the Railways Act 1993, from the British Railways Board and vested in the company formed and registered under the Companies Act 1985 and known, at the date of vesting, as Railtrack PLC,

(b) a station which is operated in connection with the provision of railway services on such a network, or

(c) a light maintenance depot.

Expressions used in this definition and in the Railways Act 1993 have the same meaning in this definition as they have in that Act, and a network such as is described in (a) above shall not cease to be such a network where it is modified by virtue of having any network added to it or removed from it.

Appendix A Superseeded and Deleted UDP Policies 17

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17 Appendix A Superseded and Deleted UDP Policies

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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					<p>the site should be de-designated for any commercial use and left to be determined by specific planning merits.</p> <p>Conclusions:</p> <p>The site is considered high quality in the ELR and is therefore retained as employment space in the NRBA.</p> <p>In our view, the sites failings have not been fully understood or assessed, nor as the site been considered in context of better located, better quality sites Additionally, in market terms the area is underperforming, and vacancy rates are high.</p> <p>To give the site the best chance of successful redevelopment and to maximise benefit for the wider area, it should be de-designated for business uses.</p>	
517383	David Hammond	Housing	5	SA11	<p>In respect of new development opportunities and in order to ameliorate issues of deprivation to access to open/green spaces the Council may wish to consider Natural England's ANGST (Accessible Natural Green Space standards), which should be referenced in the Core Strategy for the Borough and a link to this can be included within this document.</p> <p>Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This</p>	<p>In respect of the suggestion to reference the ANGST standards, the Council does not consider these standards are applicable to the built up suburban environment of an outer London borough such as Harrow. The Council has established its own standards, having regard to national and London standards, and in consultation with users and service providers, through the comprehensive PPG17 study</p>

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

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

Person ID	Full Name	Section	Para	ID	SA Form	Council Response
					<p data-bbox="1249 595 1343 958">'Potential Development Site'.</p> <p data-bbox="1249 958 1343 1308">Despite this identification within the AAP, previous detailed Core Strategy Reps, and response to the 'Call for Sites', the site has not been included within the Site Allocations DPD. Accordingly, it is considered to be of direct relevance for MP&G Trading to comment on this emerging document, and request that the site at 37-41 Palmerston Road, Wealdstone, is included as an identified site suitable for housing development .</p> <p data-bbox="1249 1308 1343 1657">Despite being within the defined boundary of the Harrow and Wealdstone Intensification Area, it is considered that the site at 37-41 Palmerston Road responds positively to, and fits within the strategic and local objectives of Borough wide planning policy. As such, it should clearly be identified as a site which is appropriate to deliver redevelopment.</p> <p data-bbox="1249 1657 1343 1935">The site is currently occupied by a garage and car hire facility, with a parking area to the front, and vacant land behind. A location plan is enclosed, outlining the extent of the site.</p> <p data-bbox="1249 1935 1343 2058">To demonstrate the site's acceptability, the same criteria-based approach used on sites included within the DPD is set out below:</p> <p data-bbox="1249 2058 1343 2159">Site Details</p>	<p data-bbox="240 147 323 595">will be considered as part of the Area Action Plan DPD, which will allocate sites within the Intensification Area.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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					on the adjacent playing fields. Drivers often park in unmarked or banned spaces or drive around waiting for a space or move off to the Morrison's car park. Apart from the removal of temporary, mobile structures, it is not clear what "rationalisation" can be made to increase parking space overall. other than making unacceptably cramped spaces or building a multi-storey structure which would be totally unacceptable immediately in front of the listed Elliott Hall. Finally, the local Green Belt is not for parking! As it was ruled out by the Secretary of State at the supermarket inquiry..	
154904	Mr David Summers	Site H16: Harrow Arts Centre car park, library and swimming pool, Hatch End		SA54	<p>1. The current situation as described in para 5.37 requires updating.:-</p> <p>a. Following financial failure, the Arts Centre complex is now re-emerging with a new lease of life under Council management.</p> <p>b. The Elliott Hall building and adjoining building have been refurbished and integrated including a lift.</p> <p>c. The car park is NOT in poor condition. It has relatively recently been renovated - new surfacing, lighting, lines, cycle shelter etc.</p> <p>d. One of the large classroom out-buildings within the red delineated area which was in poor condition has relatively recently been replaced with a new brick structure</p>	<p>This site has been removed from the housing allocation section as a result of these concerns, and is re-allocated for leisure / community art uses that preserve the amount of car parking and enhance the existing leisure/art offer.</p> <p>The text for this site will be revisited to ensure accuracy with the situation on site.</p>

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					<p>(as shown on site aerial map).</p> <ul style="list-style-type: none"> e. The swimming pool has relatively recently been refurbished. f. For some time, part of the car park has been taken up by sections of a new prefabricated building - presumably awaiting installation as a replacement for one of the remaining decrepit classroom structures within the red delineated area. <p>2. The car park is generally full to overflowing (overflow to supermarket space permitting) for much of the day / evening throughout the week. If the car park space is reduced, where would replacement / additional parking be located - the supermarket car park is not a suitable location nor is it accessible late evening. Notwithstanding an excellent PTAL, adequate "on-site" car parking is essential for the vitality of this vibrant complex as a whole (Arts, Library, Swimming, adjacent Medical Centre, adjacent sports fields, access to proposed new SINC etc.).</p> <p>3. The site is owned by Harrow Council: the responsibility for the development of the site in line with its UDP designation for arts and leisure development lies with Harrow Council. The need for an enhanced performing arts & cultural centre in Harrow has been expressed by the Community on many occasions and is again being expressed in the Core Strategy and the AAP. Designating</p>	

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

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					All opportunities to de culvert this ordinary watercourse should be sought. this in addition the provision of a minimum 5 metre undeveloped buffer strip should be provided from the outer edge of any proposed permanent building to the top of bank of the watercourse. This is in line with Harrow's Pre Submission Core Strategy, Policy 15 of the Draft Development Management DPD, recommendations within the London Borough of Harrow's SFRA and the Mayor's London Plan.	
534313	Rose Freeman	Site H16: Harrow Arts Centre car park, library and swimming pool, Hatch End		SA84	The arts centre is Harrow's main cultural offer and includes a theatre. We note the Proposal Site will now exclude Elliot Hall but with regard to our remit above we request that The Theatres Trust is consulted on the planning application for Site H16	Noted – Theatres trust will be notified of any proposals for this site.
517392	Carmelle Bell	Site H17: RAF Bentley Priory, Stanmore		SA26	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan."Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to	Supporting text to be amended as suggested.

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

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

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

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

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					were taken onboard in forthcoming editions of the Site Allocations DPD.	
542487	AAG (HQ)		Picture 5.35	SA 122	<p>The site is included within the Site Allocations DPD as being a site where planning permission for residential development has been accepted. Indeed, the principle of the site being appropriate for residential development is well-established, given the existence of an extant planning permission for a part two and three storey extension to the existing office building to provide 35 flats (LPA Ref: P/1444/10 - a renewal of a previous permission for the same development).</p> <p>Whilst partly occupied by B1 users (currently reliant on one business taking the majority of occupied floorspace), there is increasing vacant space within the building. Marketing efforts have failed to attract new occupiers due to the quality of the space failing to meet the needs of potential end-users, and in light of the weak office market which currently exists in Harrow.</p> <p>As such, it is considered there is a realistic opportunity for a comprehensive redevelopment of the site to provide a residential led mixed-use development is considered at the site, at a sustainable and highly accessible location (immediately adjacent to Stanmore Underground Jubilee Line, and with six bus routes stopping in close proximity to the site) and environment already accepted as wholly appropriate for residential development. This would allow for the provision of housing, alongside upgraded</p>	<p>Noted</p> <p>The requirements for additional floorspace need are set out in Harrow's Employment Land Study.</p> <p>It is agreed that this site is not appropriate for replacement offices in line with Harrow's Core Strategy, and this will be reflected in the allocation.</p>

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					<p>commercial space more fit for purpose.</p> <p>In looking at the opportunity of comprehensive redevelopment, the possibility of a wider development site should be considered, incorporating adjacent car park land to the north. This would allow a full redevelopment of the site with a new and enhanced frontage to London Road.</p> <p>As such, Site H18's retention in the Site Allocations DPD is strongly endorsed, as is the commentary at Paragraph 5.43 of the document which states that comprehensive redevelopment could be suitable. The possibility of a wider development site opportunity should be strongly considered.</p>	<p>The site boundary will be revised to include this area, which is in TFL ownership, alongside the four dwelling houses to the south of the site to enable a more comprehensive redevelopment.</p>
328214	Mr Jed Griffiths	Paragraph	5.43	SA46	<p>This is not correct.</p> <p>Replace first sentence with "Outline planning permission P/1220/07 was renewed in March 2010"</p>	Text amended as stated.
517392	Carmelle Bell		Picture 5.37	SA28	<p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the</p>	Supporting text amended to incorporate the suggested text.

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					<p>event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."</p>	
176136	Giles Dolphin		Picture 5.37	SA69	<p>Supported. Officers note that strategic planning applications for sites H15 (Mill Hill Farm), H17 (RAF Bentley Priory), H19 (Royal National Orthopaedic Hospital), and H25 (Edgware Town FC), have previously been referred to the Mayor of London.</p> <p>Site specific strategic issues have, therefore, previously been set out within the associated GLA planning reports (refer to comment 2 in this appendix).</p> <p>Any future strategic planning applications will be assessed against the London Plan, and considered by the Mayor, as part of the development management process, however, the Council may wish to augment the "Commentary" sections for the above sites with detail from the GLA's planning reports, particularly with respect to any strategic transport issues associated with the sites.</p>	Support noted
517379	Graham		Picture 5.37	SA114	<p>Commentary - It is important to stress the need for careful</p>	Noted – when revising the

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

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

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

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

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					<p>impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan. "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."</p>	
517306	Damien Holdstock	Site H25: Edgware Town Football Club, Edgware		SA44	<p>National Grid and Local Development Plan Documents</p> <p>The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:</p> <p>An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).</p> <p>New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).</p> <p>Our gas and electricity infrastructure is sited across the</p>	<p>Noted – ENTEC will be consulted on all DPDs as a statutory consultee.</p>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Have your say

Have your say

Status of the document and consultation

This document is the Council's Preferred approach to allocating sites in Harrow and follows on from the Council's initial consultation on this document where representations were invited as to the suitability of sites, or for new sites to be included. This consultation stage, known as a Regulation 27 consultation builds on the previous document, taking into account responses received, and is concerned with the Soundness and Legal compliance of the DPD, before it is submitted for independent examination to the secretary of state.

The purpose of the Site Allocation DPD is to allocate sites for housing, employment and other land uses, and to identify these and other planning designations, such as Conservation Areas, on the Proposals Map. This document allocates sites throughout the Borough but outside of the Harrow and Wealdstone Intensification Area. Sites inside the Intensification Area will be allocated through the Area Action Plan for the Harrow and Wealdstone Intensification Area (also out to consultation).

Once adopted, the Site Allocations DPD will form part of Harrow's Local Development Framework with the allocated sites either updating or replacing those in the existing development plan for Harrow. The Council is inviting comments as to the soundness of this document, and its legal compliance. Guidance on this can be found in appendix ?. All comments received will be submitted alongside the DPD for independent examination in 2012.

This paper and all supporting documents can be found and commented upon on the Council's interactive consultation portal at: <http://harrow-consult.limehouse.co.uk/portal> or viewed on the Council's planning pages at: www.harrow.gov.uk/ldf. Hard copies are available for inspection at the Council's office and at all public libraries in the Borough.

Please let us have your comments in one of the following ways:

- The easiest way is to view and comment on the document online via our interactive portal: <http://harrow-consult.limehouse.co.uk/portal>
- Alternatively, you can download a Regulation 27 response form from www.harrow.gov.uk/ldf and email or post it back to us.

The closing date for responses is ???.

For further information on this document, please contact the Council:

- By e-mail: ldfconsultation@harrow.gov.uk
- By telephone: 020 8736 6082
- In writing: LDF Team, Planning, 3rd Floor, Civic 1, Harrow Council, Station Road, HA1 2UY

2 Introduction

Harrow's Local Development Framework

2.1 Harrow's Local Development Framework (LDF) comprises a suite of documents which, together with the London Plan (2011), will form a part of the 'development plan' for the Borough. Being part of the 'development plan' means that decisions on planning applications must be made in accordance any relevant provisions in those documents, unless there are robust planning reasons to depart from them. The LDF for Harrow will be made up of the following documents:

- **Core Strategy**

The Core Strategy sets out Harrow's vision for the development of the Borough up until 2026. It comprises a 'spatial strategy' for development and planning policies for the Borough as a whole and the districts within it. The Core Strategy was adopted by the Council in February 2012.

- Site Allocations DPD which allocates sites for housing, employment, retail, open space, and other uses (outside the Intensification Area)
- Development Management Policies DPD which sets out the detailed policies against which planning applications will be assessed.
- Area Action Plan for Harrow and Wealdstone Intensification Area which provides detailed policies to manage development in this area.

What is the Site Allocations Development Plan Document?

2.2 The Site Allocations Development Plan Document (DPD) identifies sites throughout the Borough, excluding the Intensification Area, for development up to 2026. It has been prepared in-line with the policies in the Core Strategy which sets out the vision and objectives for the spatial development of the area. The Area Action Plan for Harrow and Wealdstone will allocate sites in the Intensification Area.

2.3 The Site Allocations DPD sets out the allocation of sites as needed to achieve the objectives of the Core Strategy. These include:

- Locations for a range of housing development to meet the needs of the local current and future population ⁽¹⁾
- Locations for a range of employment sites and designations
- Retail frontages and designations
- Locations for mixed use development

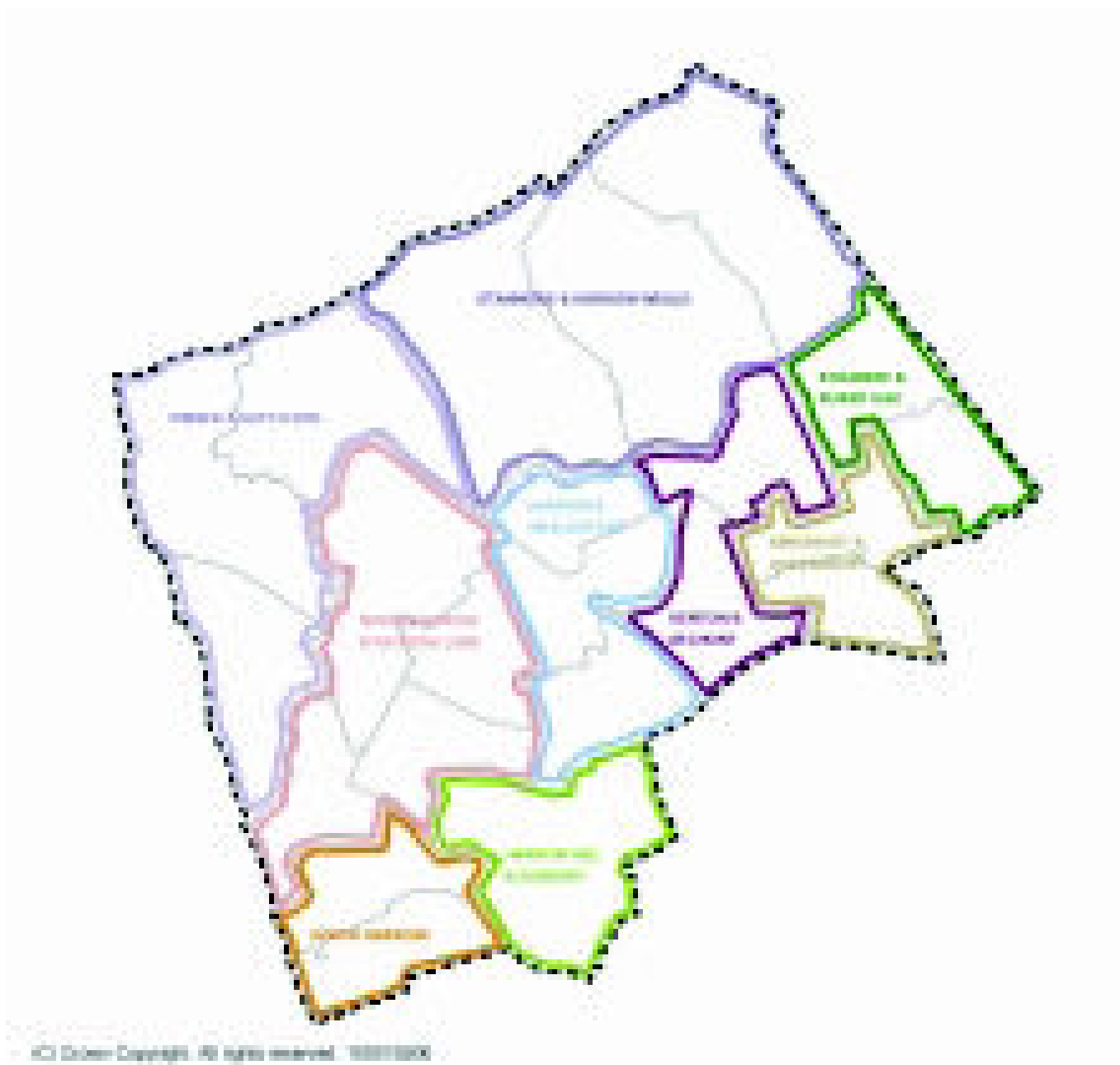
Potential housing sites have been consulted on previously as part of the Core Strategy.

Site Allocations Pre-Submission DPD

- Specific land requirements for infrastructure
- Open spaces and areas of Biodiversity

2.4 All sites in the document are grouped by Core Strategy sub area for ease of reference. All existing allocations from the Harrow UDP 2004 (with the exception of the UDP Proposals Sites) will be brought forward unless changed by this document or the Area Action Plan.

Picture 2.1 Core Strategy Sub Areas



Sustainability Appraisal of the Site Allocations DPD

2.5 The Site Allocations DPD (along with all other LDDs) is subject to a Sustainability Appraisal (SA). Please refer to the LDF web pages to view the SA Document which has been produced in tandem with the Site Allocations DPD.

3 Retail

Town Centre and Retail Development

3.1 There are sixteen town centres the Borough, comprising Harrow metropolitan Centre, Edgware major centre, nine district centres and five local centres. Two centres - Edgware and Kingsbury - are located predominantly in neighbouring boroughs with only peripheral parades extending into Harrow. Kenton straddles the boundary with the London Borough of Brent. Burnt Oak centre crosses into the London Borough's of Brent and Barnet. The hierarchy of metropolitan, major and district centres is established in the London Plan (2011); local centres are identified at Borough level. A full list of centres is included at Appendix B of the Core Strategy (2012) and their geographical extent within the London Borough of Harrow is defined on the Harrow adopted policies map.

3.2 The National Planning Policy Framework (2012)⁰ requires local planning authorities to (summarised):

- allocate a range of suitable sites for retail and other town centre development, ensuring that needs are not compromised by limited site availability;
- allocate edge of centre sites where in-center sites are not available; and
- recognise that residential development can contribute to the vitality of centres.

3.3 Policy 4.8 *Supporting a Successful and Diverse Retail Sector* of the London Plan directs additional comparison goods retail capacity to international, metropolitan and major centres, and supports convenience retail development in district, local and neighbourhood centres. Harrow's Retail Study (2009) forecasts a requirement for 38,912m² comparison goods retail floorspace and 5,261m² convenience goods retail floorspace to 2025. In accordance with the London Plan and to help sustain its metropolitan centre status the Core Strategy directs major comparison goods retail and leisure development to Harrow town centre; convenience retail and non-major comparison goods retail development is directed to other centres as compatible with the role and function of the centre.

3.4 Since the publication of the Retail Study the following additional major retail development have been approved:

- an extension to provide 2,368m² (net) comparison goods floorspace and 651m² (net) convenience goods floorspace at Tesco, Station Road, Harrow town centre;
- a new supermarket to provide 560m² (gross) comparison goods floorspace and 3,440m² (gross) convenience goods floorspace, and a further 1,000m² floorspace for A1/A2/A3/A4/A5 uses at Harrow View east (former Kodak site), Headstone Drive, Wealdstone.

3.5 The Area Action Plan will allocate sites for the balance of comparison goods development in Harrow town centre. This Site Allocations DPD allocates a further XX sites for retail development in or on the edge of town centres to ensure that there is a selection of suitable sites available to accommodate any further convenience goods floorspace and to provide for any new, non-major comparison goods floorspace outside of Harrow town centre. The selection of sites has been

Site Allocations Pre-Submission DPD

informed by the Retail Study assessment of site availability and suitability. Only those sites rated as having good or reasonable development prospects have been included, to ensure that allocated sites are deliverable. The Development Management Policies DPD sets out criteria for a sequential approach to site selection, ensuring that those sites allocated within town centres are given preference to those that are allocated on the edge of centre.

3.6 In all cases the site allocations are expected to be retail led mixed-use schemes which include an appropriate residential capacity. This is to ensure that the development of allocated sites make the fullest possible contribution to town centre vitality and viability, and to make efficient use of previously developed land in accordance with the Borough's spatial strategy.

3.7 The National Planning Policy Framework also requires local planning authorities to define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages as a basis for setting policies for town centre uses. Harrow's Retail Study does not identify a need for any town centre boundary revisions but does recommend a small number of changes to the extent of primary and secondary frontages in selected centres. These changes will be given effect through this DPD and amendments made accordingly to the adopted policies map.

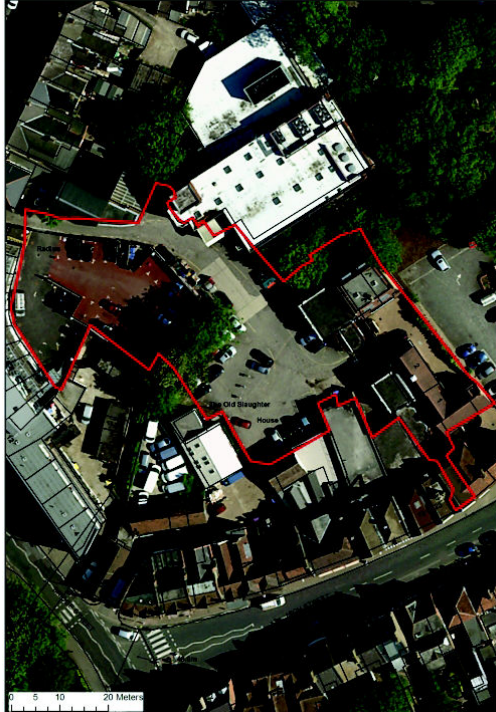
3.8 Primary shopping areas are a new designation in Harrow, and these are designated for Harrow town centre and the district centre of Wealdstone (to be allocated as part of the Area Action Plan for Harrow and Wealdstone), and the district centres of South Harrow, Rayners Lane, Pinner and Stanmore - shown below. The role and function of other centres is considered to be predominantly retail focused, with little or no presence of other main town centre uses forming significant identifiable areas beyond the main shopping frontages. Therefore, in these centres, it is not considered necessary to identify a primary shopping area.

3.9 Appendix B of the Harrow Core Strategy identifies 31 neighbourhood parades outside of the Harrow & Wealdstone Intensification Area. The geographical extent of these neighbourhood parades will be defined in this DPD and shown on the adopted policies map.

3.10 The Development Management Policies DPD sets out the policies applicable to town centres, primary and secondary frontages, primary shopping areas (where relevant) and to neighbourhood parades.

Retail-led Development Sites

Site: R1 Land between High Street and Love Lane (Pinner)



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Site Details

Site Area:	0.31 hectares
Existing Use:	The site is currently occupied by small retail units and a service area / car parking
Potential Retail Floorspace:	1,500m ²
Other Uses Proposed:	Residential (39 homes)
Ward:	Pinner
Core Strategy Sub Area:	Pinner and Hatch End

Planning Designations

Flood Zone:	Zone 2 and 3a
Public Transport Accessibility Level:	3
Town Centre:	Pinner district centre

Site Allocations Pre-Submission DPD

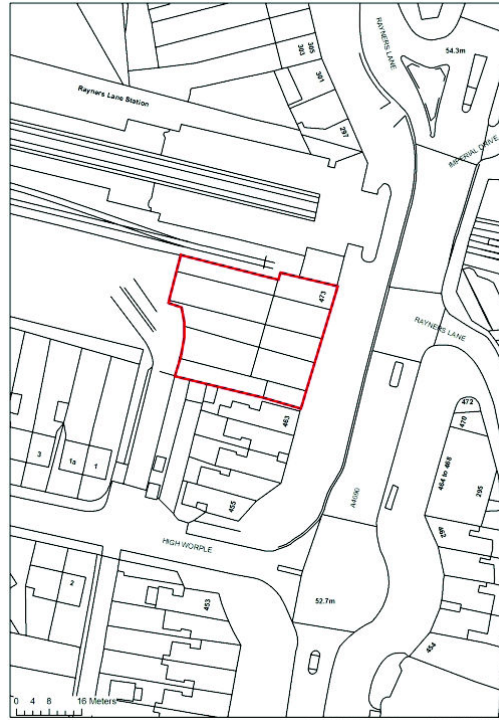
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	Conservation Area adjacent listed buildings
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	Yes
Other:	Pinner district centre primary shopping area (proposed)

Commentary

3.11 The site is within Pinner district centre and forms a part of the proposed primary shopping area for the centre. It is suitable for major convenience goods and non-major comparison goods retail development, and is rated as having reasonable development prospects. Development would need to address flood risk issues associated with the River Pinn, which flows through the site, and should contribute to policy objectives for deculverting and environmental improvement of watercourses. Residential development will need to be directed to those parts of the site within Flood Zone 2 as defined by a site specific Flood Risk Assessment. The design and layout of any proposals must be sensitive to the heritage and character of Pinner High Street in particular, and investigation of the potential for below-ground archaeology within this archaeological priority area will be required.

3.12 Part of the site includes Barters Walk, a parade of small shops that links the High Street to the Marks & Spencer food store at the rear of Love Lane. The design and layout of any proposals should seek to integrate Barters Walk to achieve enhancements to pedestrian permeability within the centre, and to improve the environment of this existing link. An appropriate level of car parking will be sought, within the London Plan maximum standards, to serve the needs of residents on the site and shoppers in the centre.

Site: R2 Units South of Tube station on Alexandra Avenue (Rayners Lane)



Site Details

Site Area:	0.11 hectares
Existing Use:	Five single storey retail units
Potential Retail Floorspace:	500m ²
Other Uses Proposed:	Residential (15 homes)
Ward:	Rayners Lane
Core Strategy Sub Area:	North Harrow & Rayners Lane

Planning Designations

Flood Zone:	Zone 1
Public Transport Accessibility Level:	5
Town Centre:	Rayners Lane District Centre
Employment Land:	No
Area of Special Character:	No

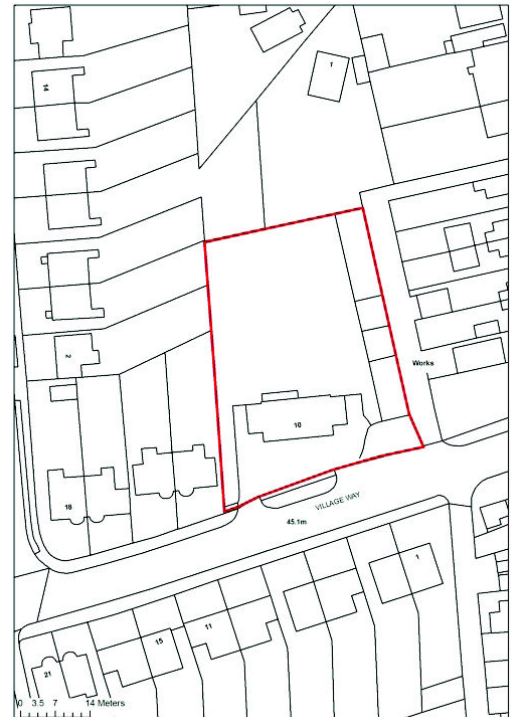
Site Allocations Pre-Submission DPD

Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	Conservation Area
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Rayners Lane district centre primary shopping area (proposed)

Commentary

3.13 The site is located within Rayners Lane district centre and comprises five single-storey units and land at the rear on Alexandra Avenue to the south of Rayners Lane Underground station. It is suitable for replacement/increased retail floorspace at ground floor/basement level with residential above. The design and layout of any proposals must be sensitive to the heritage of Rayners Lane, in particular the neighbouring listed station building which should remain the prominent visual feature in the approach from Imperial Drive and Alexandra Avenue.

Site: R3 Harrow West Conservative Association and Hallmark Cars, Village Way (Rayners Lane)



Site Details

Site Area:	0.19 hectares
Existing Use:	Harrow West Conservative Association, Curves Fitness and Hallmark Cars
Potential Retail Floorspace:	1,000m ²
Other Uses Proposed:	None
Ward:	Rayners Lane
Core Strategy Sub Area:	North Harrow & Rayners Lane

Planning Designations

Flood Zone:	Zone 3A
Public Transport Accessibility Level:	4
Town Centre:	Edge of Rayners Lane District Centre
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Within 300m of the Rayners Lane district centre primary shopping area (proposed)

Commentary

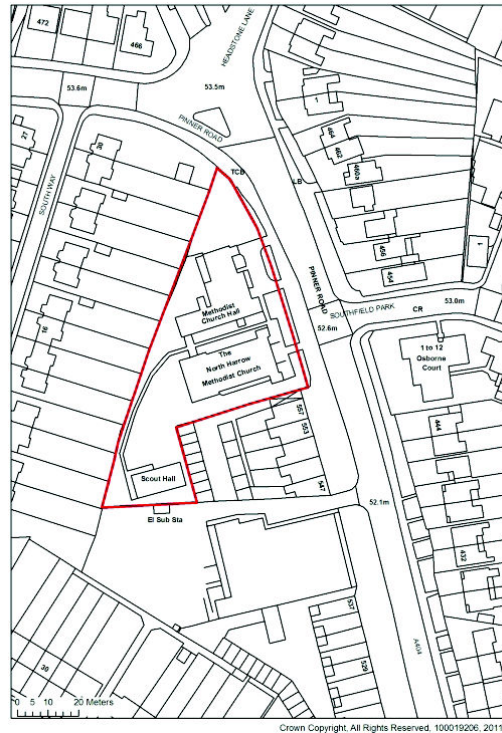
3.14 The site is located outside of the Rayners lane district centre boundary but is within 300m of the centre's proposed primary shopping area, and the site should therefore be treated as being 'edge of centre' for retail purposes in accordance with the National Planning Policy Framework. It is suitable for multiple small retail units, or for a single convenience goods retailer such as a discount food outlet.

Site Allocations Pre-Submission DPD

3.15 Development would need to address flood risk issues associated with the Smarts Brook arm of the Yeading Brook. The whole of the site is within Flood Zone 3A and it is therefore unsuitable for residential development unless a site specific flood risk assessment demonstrates that the exception test can be passed.

3.16 Being at the edge of the district centre, the site forms a transition between the more commercial character of the centre and the surrounding suburban constituency. Particular care will therefore be needed to manage impacts upon neighbouring dwellings and to ensure that the surrounding residential environment is safeguarded.

Site: R4 North Harrow Methodist Church, Pinner Road (North Harrow)



Site Details

Site Area:	0.34 hectares
Existing Use:	North Harrow Methodist Church
Potential Retail Floorspace:	2,000m ²
Other Uses Proposed:	Residential (48 homes) and replacement community uses
Ward:	Headstone North
Core Strategy Sub Area:	North Harrow & Rayners Lane

Planning Designations

Flood Zone:	Zone 1
Public Transport Accessibility Level:	3
Town Centre:	Edge of North Harrow District Centre
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	N/A

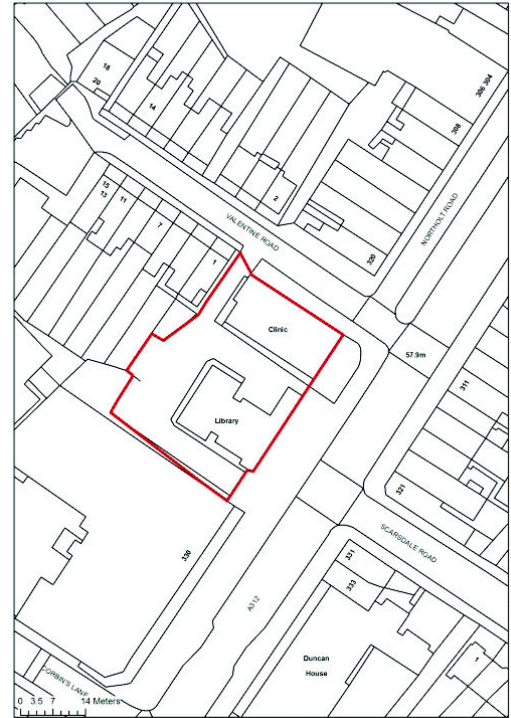
Commentary

3.17 The site is located outside of the North Harrow district centre boundary but is within 300m of the centre's secondary shopping frontage, and the site should therefore be treated as being 'edge of centre' for retail purposes in accordance with the National Planning Policy Framework. It is suitable for redevelopment to multiple small retail units, or for a single convenience goods retailer such as a discount food outlet.

3.18 The site is currently occupied by North Harrow Methodist Church. Redevelopment should make provision for a replacement place of worship/community uses as well as residential use.

3.19 Being at the edge of the district centre, the site forms a transition between the more commercial character of the centre and the surrounding suburban constituency. Particular care will therefore be needed to manage impacts upon neighbouring dwellings and to ensure that the surrounding residential environment is safeguarded.

Site: R5 Roxeth Library and Clinic, Northolt Road (South Harrow)



Site Details

Site Area:	0.165 hectares
Existing Use:	Public library and adjacent health care clinic
Potential Retail Floorspace:	1,000m ²
Other Uses Proposed:	Residential (34 homes) and replacement community uses
Ward:	Roxeth
Core Strategy Sub Area:	South Harrow

Planning Designations

Flood Zone:	Zone 1
Public Transport Accessibility Level:	3
Town Centre:	No
Employment Land:	No

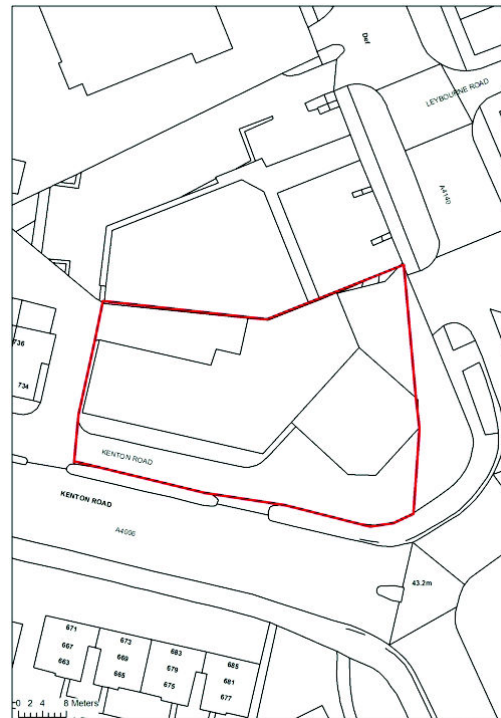
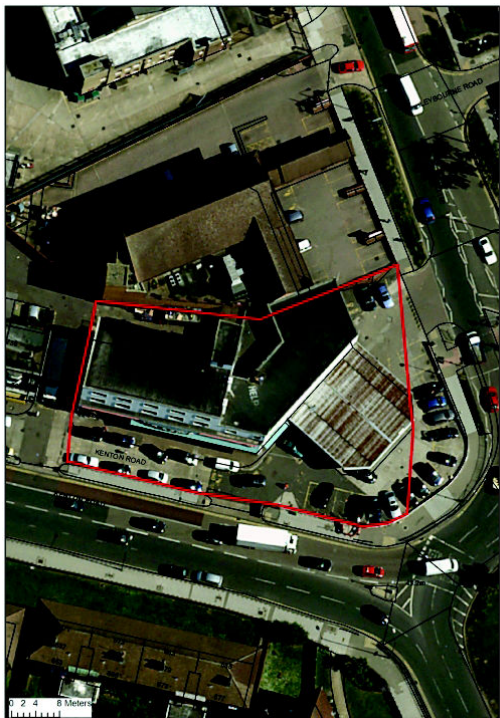
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	South Harrow district centre primary shopping area (proposed)

Commentary

3.20 The site is within Pinner district centre and forms a part of the proposed primary shopping area for the centre. It is suitable for multiple small retail units, a single larger convenience goods unit or as an extension to the adjacent Sainsbury's supermarket.

3.21 The site is currently occupied by Roxeth Library and a health care clinic. Redevelopment should make provision for a replacement library/health care facility (if needed) as well as residential use.

Site R6: Land at the Junction of Kenton Road and Honeypot Lane (Kingsbury)



Site Allocations Pre-Submission DPD

Site Details

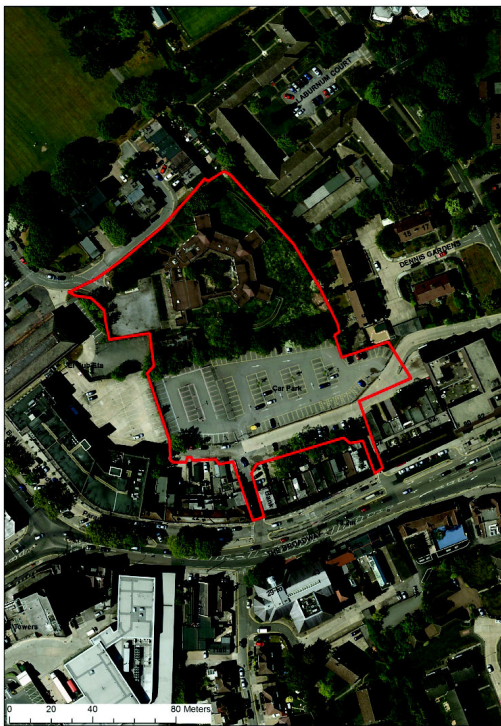
Site Area:	0.18 hectares
Existing Use:	Grocery retail unit and car park
Potential Retail Floorspace:	1,000m ²
Other Uses Proposed:	Residential (18 homes)
Ward:	Kenton East
Core Strategy Sub Area:	Kingsbury & Queensbury

Planning Designations

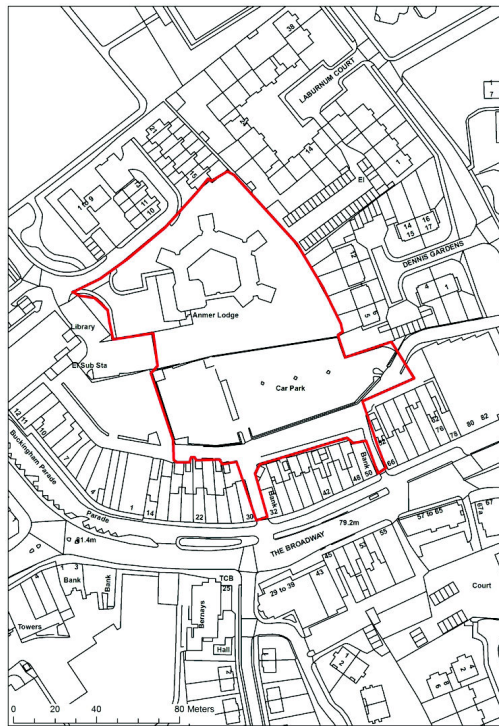
Flood Zone:	Zone 1
Public Transport Accessibility Level:	3
Town Centre:	Kingsbury District Centre
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	N/A

Commentary

Site R7: Anmer Lodge and Stanmore Car Park, The Broadway, Stanmore



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Site Details

Site Area:	0.67 hectares
Existing Use:	Car Park and disused Care Home
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	136
Other Uses Proposed:	Retail/Community Uses
Ward:	Stanmore Park
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	2

Site Allocations Pre-Submission DPD

Town Centre:	Stanmore district centre (car park site only)
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	UDP Service Road Proposal No. 7: Rear of The Broadway/Buckingham Parade

Relevant Planning History

3.22 In 2009 a planning application was made on behalf of Tesco stores for the development of a new supermarket and associated car parking. The application was subsequently withdrawn.

Commentary

3.23 In 2010 the Council commissioned Savilles to prepare a brief of options for the comprehensive redevelopment of the car park and former care home site. As a whole, the site is suitable for mixed-use development to accommodate a moderately sized supermarket, consistent with the role and function of Stanmore district centre, and a community use (possibly a replacement library facility or premises for health care). The boundary of Stanmore district centre is contiguous with the north side of the car park, and the retail/any other town centre uses should therefore be located within the southern half of the site. Residential development of a form and density suitable to this town centre location should form part of the mix on the southern part of the site. More traditional residential development, which reflects the context created by existing housing in Coverdale Close, is likely to be appropriate to the north of the site.

3.24 A key objective for the site as a whole is to ensure that the retail and any other town centre components are properly related to existing frontage in The Broadway, and that satisfactory arrangements for the servicing of these uses are made. There is a significant fall in site levels from north to south which will need to be addressed in a way that contributes to the creation of a Lifetime neighbourhood, and which secures the implementation of Green Grid projects to enhance links between the Belmont Trail and the Green Belt.

3.25 Anmer Lodge forms part of UDP Proposal Site 26 for housing or community use. This allocation will extend the Proposal Site to the car park and for the retail/town centre uses as described above.

Commentary

3.26 The land at the junction of Kenton Road and Honeypot Lane is located within the District Centre of Kingsbury. The site is currently a large ethnic grocery retail unit (VB & Sons) and a car park. Kingsbury District Centre does not have a Primary Shopping Frontage and the site is located adjacent to a Secondary Shopping Frontage and could therefore be considered as an 'edge-of-centre' site in retail terms. A mixed-use form of development comprising of a town centre use on the ground floor with residential above would be considered.

3.27 Sequential test

3.28 The following table refers to sites allocated under the Mixed Use and Housing chapter, that are suitable for retail development to form part of the proposal.

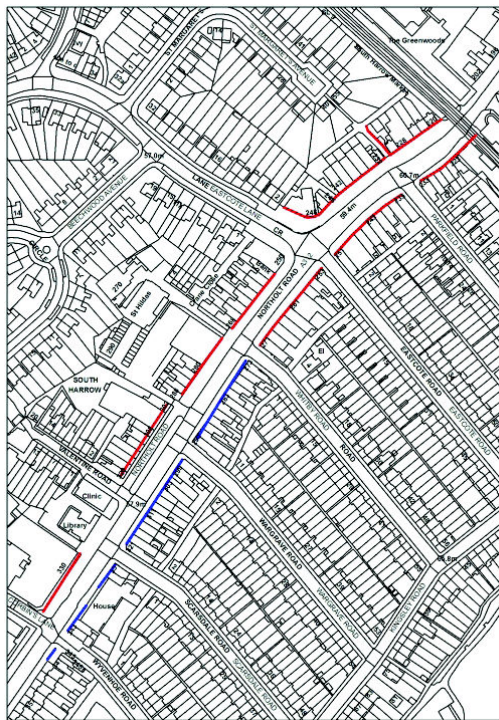
Site Number	Page Number	Site Address
		Roxeth Library and Clinic, Northolt Road, SouthHarrow
		Northolt Road Business Use Area (North)
		Northolt Road Business Use Area (South)
		90-100 Pinner Road , Harrow
		Rayners Public House
		North Harrow Library and Children's Services, Harrow
		Anmer Lodge and Stanmore Car Park, The Broadway, stanmore
		287-293 Whitchurch Lane , CanonsPark
		415 Burnt Oak Broadway
		47 - 49 High Street , Edgware
		57-59 High Street , Edgware

Changes to Designated Retail Frontages

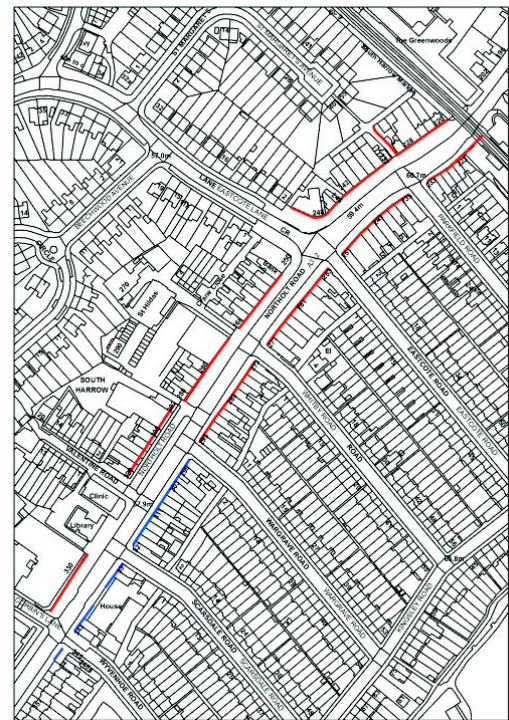


RF 01 South Harrow District Centre

Picture 3.1 South Harrow Existing Frontages



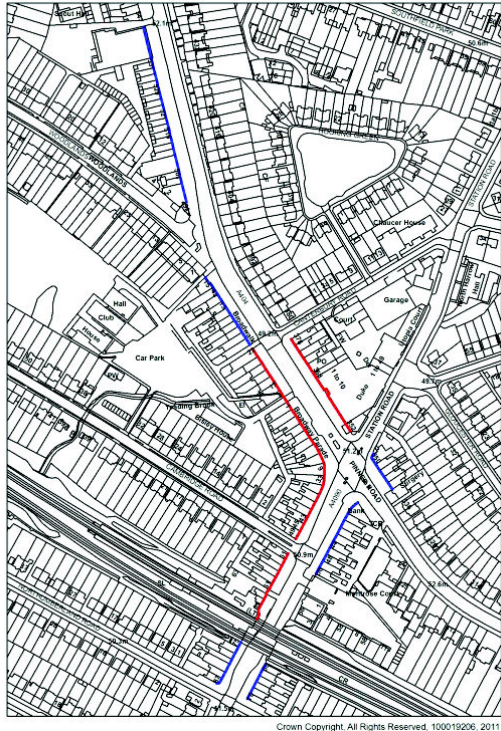
Picture 3.2 South Harrow Revised Frontages



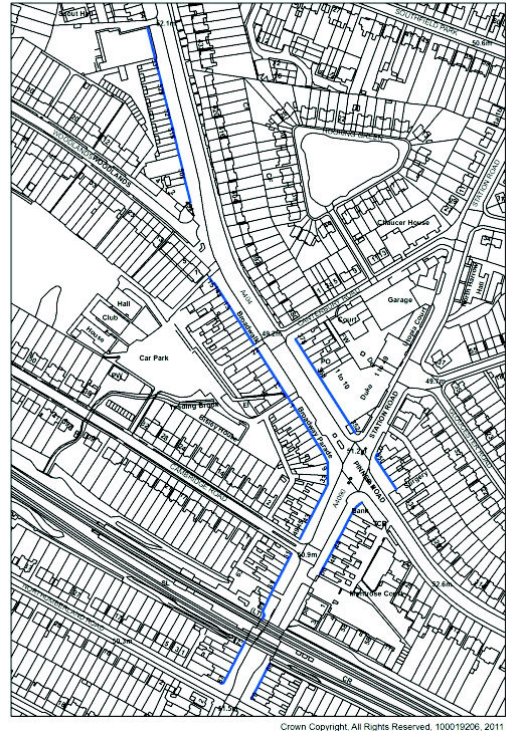
3.29 The Harrow Retail Study (2009) found that 273-295 (odd) Northolt Road contains key national retailers within the centre such as Boots, Shoe Zone and Greggs, and recommended for consistency that either (i) this frontage be re-designated as primary shopping frontage; or (ii) all frontages in the centre be re-designated as secondary shopping frontage. Evidence shows that the centre enjoys a good range of shops and services, including national and independent retailers, and low levels of vacancy. To maintain South Harrow as a vibrant, healthy district centre, the Council has extended the primary frontage to 273-295 Northolt Road.

RF 02 North Harrow District Centre

Picture 3.3 North Harrow Existing Frontages



Picture 3.4 North Harrow Revised Frontages



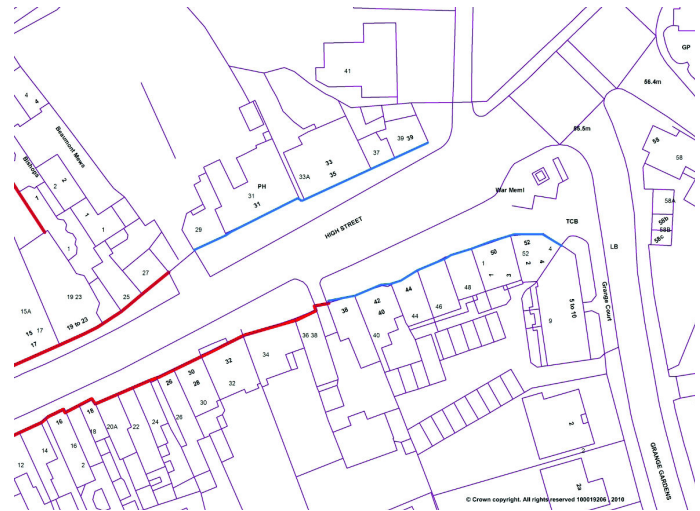
3.30 The Harrow Retail Study (2009) found that 34-56 (even) Station Road and 435 Pinner Road (former Lloyds bank) contain similar retailers to those found in the primary shopping frontage opposite, and recommended for consistency that either (i) this frontage be re-designated as primary shopping frontage; or (ii) all frontages in the centre be re-designated as secondary shopping frontage. Evidence shows that there are long-term, high levels of vacancy within the centre and in particular within the existing primary frontage. To support a greater mix of appropriate town centre uses and help reduce long-term vacancy, the Council has re-designated all frontages in the centre as secondary.

RF 03 Pinner District Centre

Picture 3.5 Existing Frontages High St Pinner



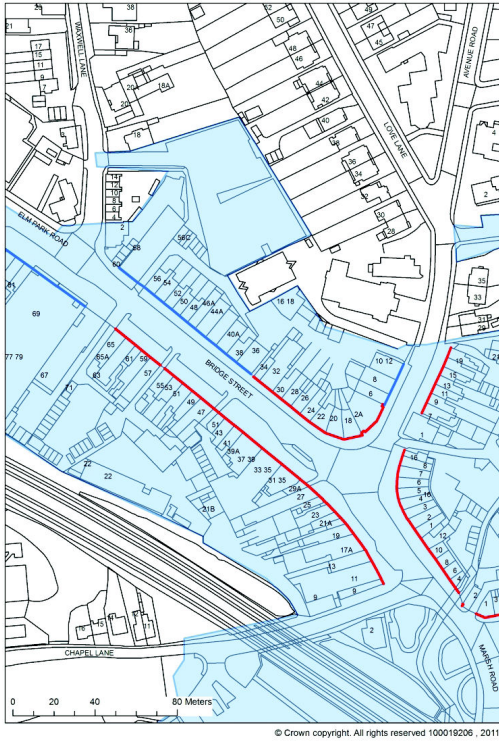
Picture 3.6 Changes to Frontages, High St Pinner



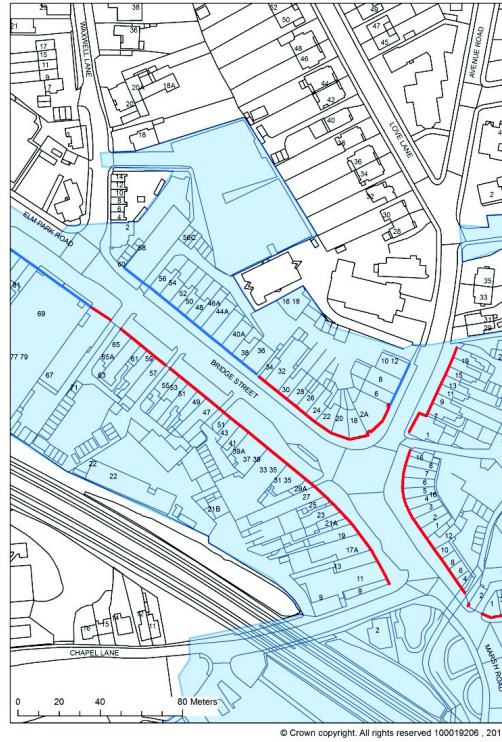
3.31 The Harrow Retail Study (2009) found that 38-52 (even) and 29-39 (odd) High Street contain mainly independent and service retailers, and that this frontage does not have the same footfall as the rest of the centre's primary shopping frontage. For these reasons the Study recommends that this part of Pinner High Street be re-designated as secondary shopping frontage and this DPD gives effect to that change.

RF 04 Pinner District Centre

Picture 3.7 Existing Frontages
Pinner



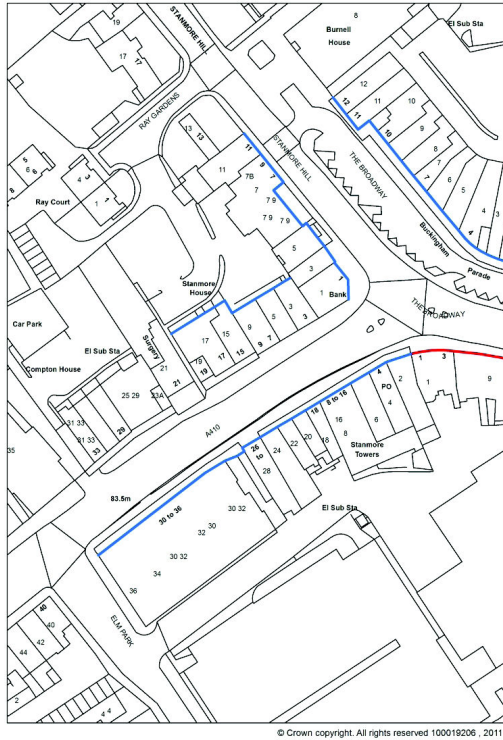
Picture 3.8 Revised Primary
Frontages, Pinner



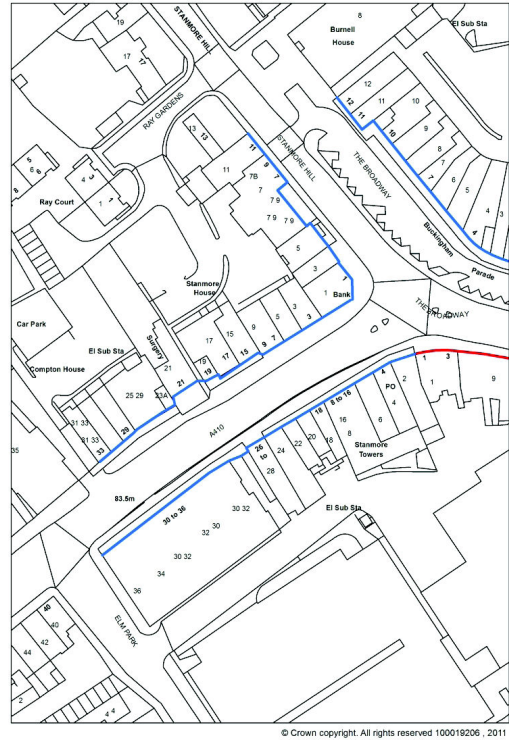
3.32 The existing UDP proposals map fails to identify two small sections of primary frontage in Pinner as listed in Schedule 7 of Harrow's UDP 2004. The Site Allocations DPD rectifies this by illustrating the correct primary frontage at 67 Bridge Street and 1 Love Lane.

RF 05 Stanmore District Centre

Picture 3.9 Stanmore Existing Secondary Frontages



Picture 3.10 Stanmore Revised Secondary Frontages



3.33 The existing UDP proposals map fails to identify part of the secondary frontage at Stanmore as listed in Schedule 7 of Harrow's UDP 2004. The Site Allocations DPD rectifies this by illustrating the correct secondary frontages at 1- 33 Church Road.

Neighbourhood Parades

3.34 The Core Strategy recognises the role of neighbourhood parades as providing important locations for small scale and walk-to shopping facilities, services and community uses. They supplement the role of district and local town centres and contribute both to the economy and sustainability of Harrow's suburbs. Appendix 4 of the Core Strategy identifies the broad locations of the Borough's neighbourhood parades. The allocations below show in detail the frontages comprising these neighbourhood parades, to which development management policies for appropriate ground floor uses will apply.

Site NP 00: Headstone Parade - Headstone Drive



Site NP 01: Hindes Road Parade - Hindes Road



3.35 Headstone Parade Comprises:

- 204, 214-216, 226 and -211-219 (odds) Harrow View,
- 1-4 Headstone Parade,
- 69, 75, 81, 91 Headstone Gardens,
- 1-6 The Quadrant

3.36 Hindes Road Parade

- 104-108 (evens) Hindes Road
- 103 - 125 (odds) Headstone Road

Site NP 02: Kenton Lane - Priestmead School



Site NP 03: Northolt Road - North Frontages



3.37 Kenton Lane - Priestmead School Parades

- 215 -245 (odds) Kenton Lane
- 279 - 301 (odds) Kenton Lane

3.38 Northolt Road - North Frontages

- 183 - 195 (odds) Northolt Road
- 201 - 209 (odds) Northolt Road
- 196 -202 (evens) Northolt Road

3.39 Shaftesbury Parade - Roxeth Hill

- 1-2 The Broadway
- Roxeth House (Ground floor)
- 9-13 (odds) Northolt Road

3.40 Shaftesbury Circle Parade

- 1-9 Shaftesbury Circle
- 28 - 40 Shaftesbury Circle

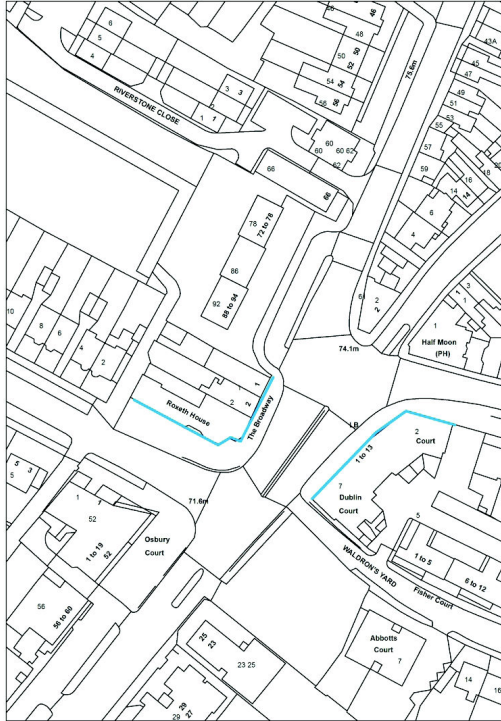
3.41 Harrow on the Hill - High Street

- 21-45 (odds) High Street
- 82 - 86 (evens) High Street

3.42 Eastcote Lane Frontages

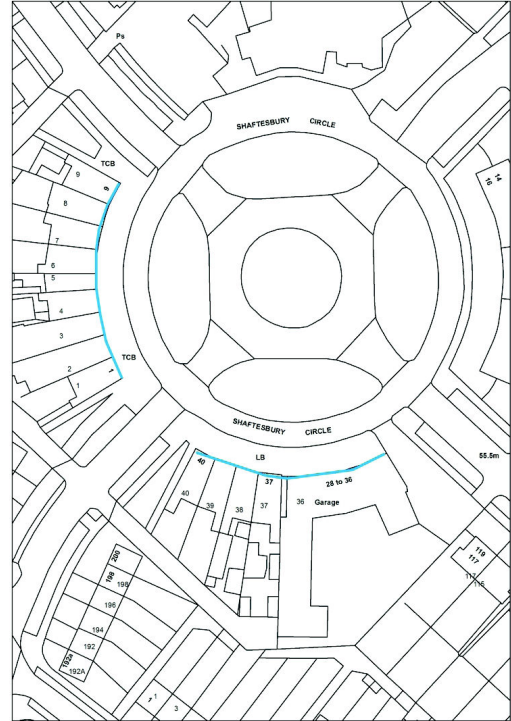
- 397 - 405 (odds) Eastcote Lane
- 793 - 803 (evens) Field End Road

Site NP 04: Shaftesbury Parade - Roxeth Hill



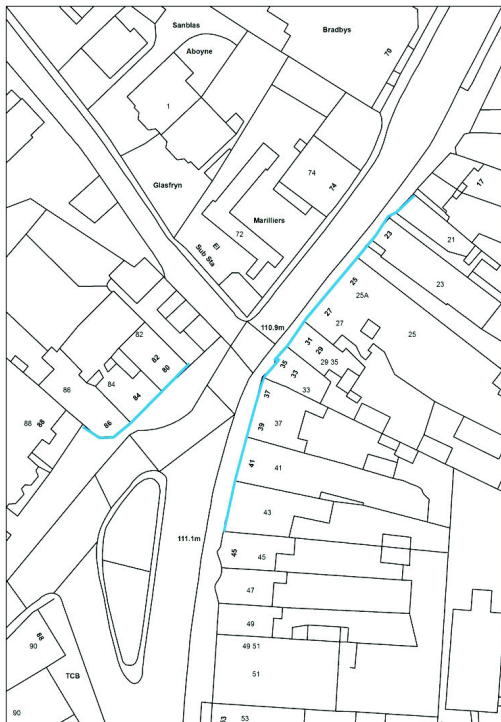
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Site NP 05: Shaftesbury Circle Parade



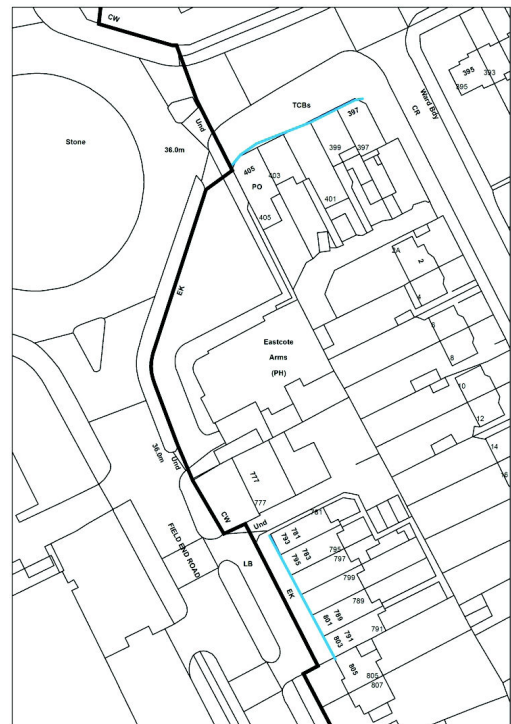
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Site NP 06: Harrow on the Hill - High Street



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Site NP 07: Eastcote Lane Frontages



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3.43 Eastcote Lane

- 302 - 348 (evens) Eastcote Lane

3.44 Alexandra Avenue and Eastcote

- 174 - 218 (evens) Alexandra Avenue

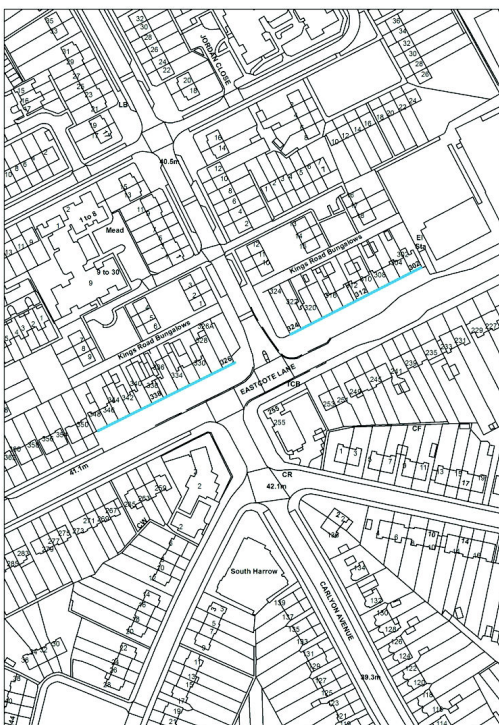
3.45 The Heights

- 209 - 215 The Heights

3.46 Northolt Road South Frontages

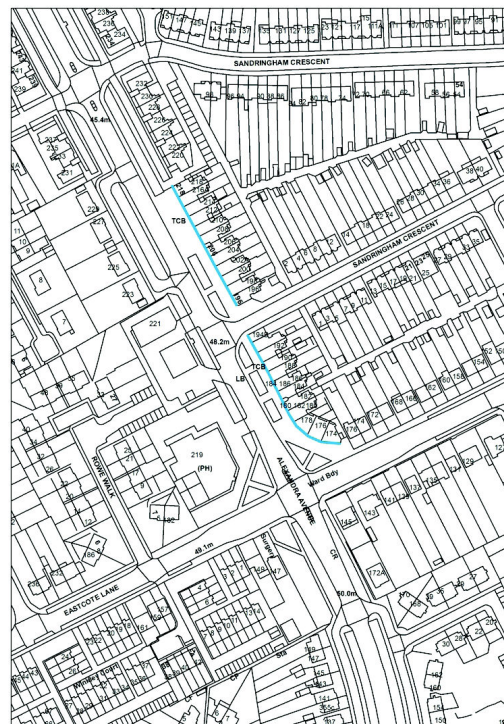
- 1-6 Alexandra Parade
- 1 - 23 Station Parade
- 493 - 503 (odds) Northolt Road
- 381 - 399 (odds) Northolt Road
- 368 - 390 (evens) Northolt Road

Site NP 08: Eastcote Lane



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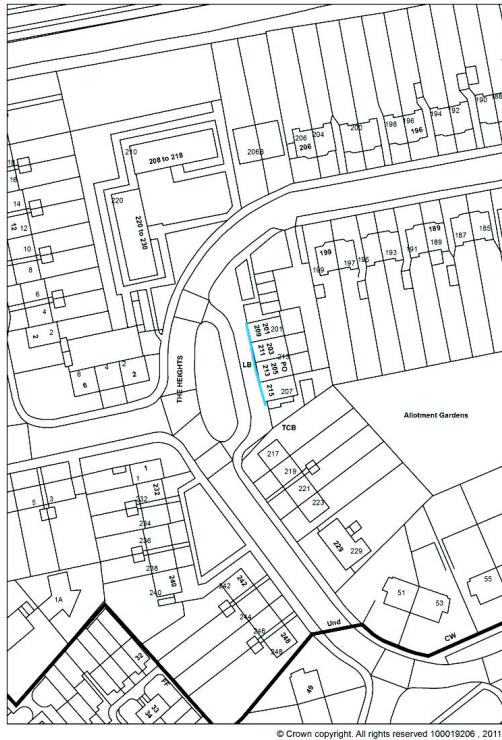
Site NP 09: Alexandra Avenue and Eastcote



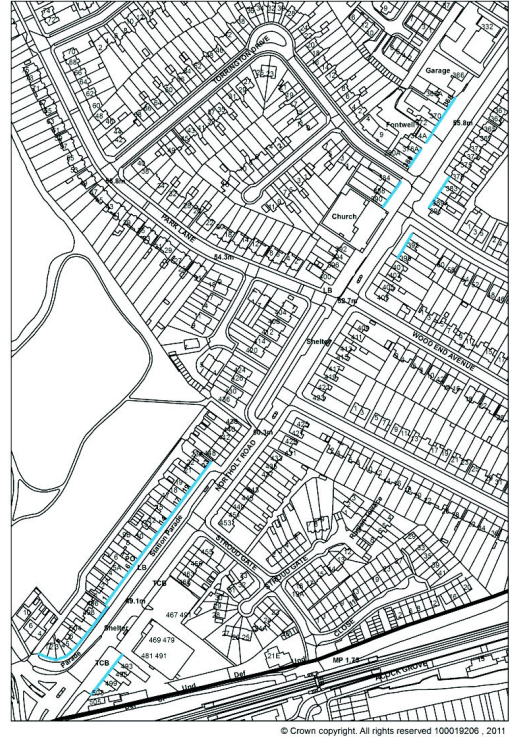
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Site Allocations Pre-Submission DPD

Site NP 10: The Heights



Site NP 11: Northolt Road - South Frontages



3.47 Alexandra Avenue - Rayners Lane

- 383 - 397 (odds) Alexandra Avenue
- 398 Alexandra Avenue

3.48 Headstone Lane - Fernleigh Court

- 189 - 209 (odds) Headstone Lane

3.49 Pinner Road- Pinner View

- 90 -184 (evens) Pinner Road

Site NP 13: Alexandra Avenue - Rayners Lane



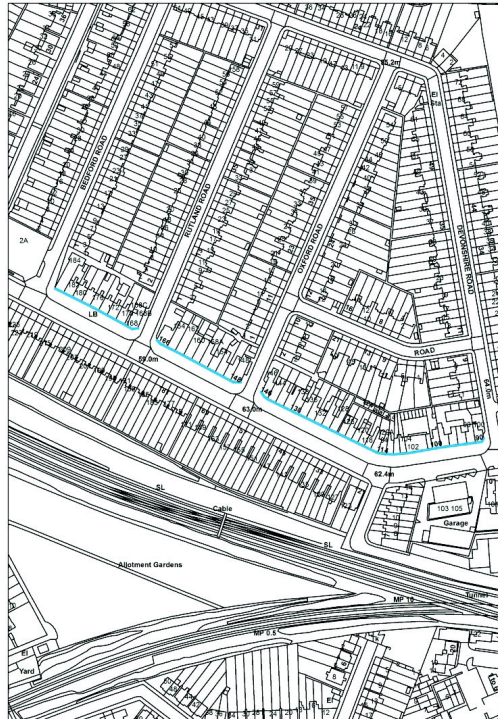
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Site NP: 14 Headstone Lane - Fernleigh Court



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Site NP: 15 Pinner Road - Pinner View



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Site Allocations Pre-Submission DPD

3.50 Blenheim Road - West Harrow

- 126 - 136 (evens) Blenheim Road

3.51 Vaughan Road

- 130 - 150 (evens) Vaughan road

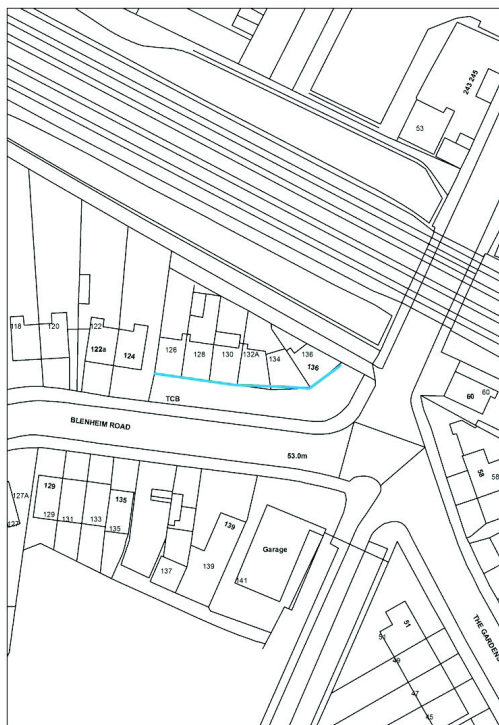
3.52 Cannons Lane - Hereford Gardens

- 72 - 90 (evens) Cannon Lane
- 42 - 58 (evens) Coronation Parade, Cannon lane
- 2 - 10 (evens) Whittington Way

3.53 Pinner Green

- 52 - 76 (evens) Pinner Green
- 3 - 13 (odds) Pinner Green

Site NP 16: Blenheim Road - West Harrow

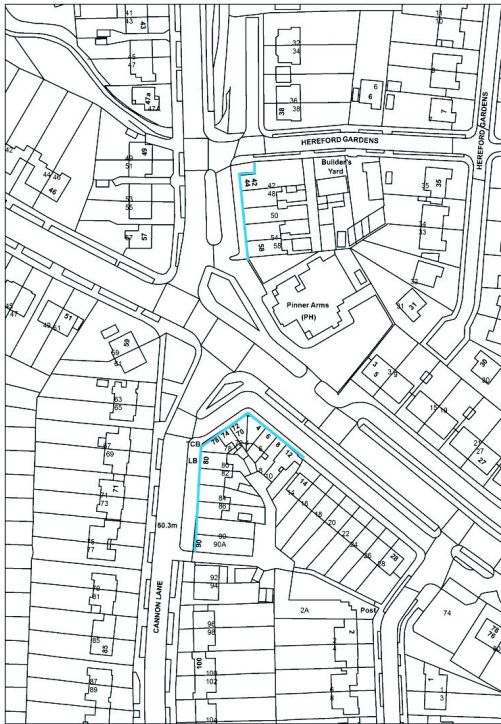


Site NP 17: Vaughan Road

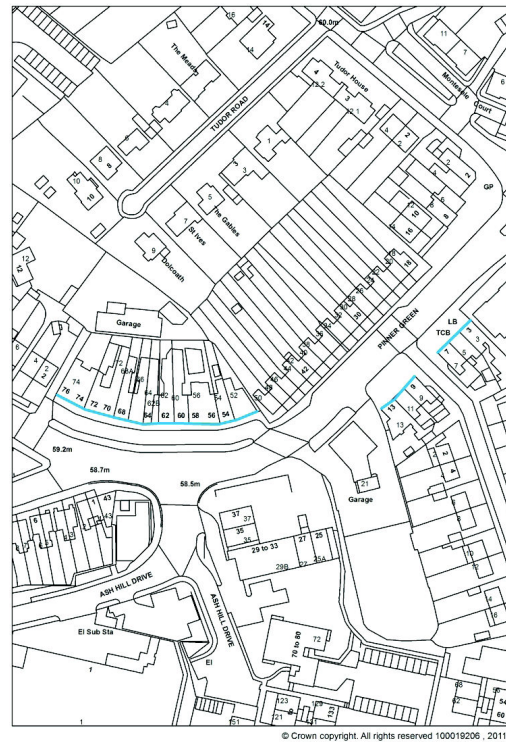


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Site NP 18: Cannons Lane - Hereford Gardens



Site NP 19: Pinner Green



3.54 Long Elmes

- 237 - 259 (odds) Long Elmes

3.55 Uxbridge Road - Kenton Lane Junction

- 103 - 109 (odds) Uxbridge Road
- 72 Uxbridge Road
- 75 - 97 (odds) Uxbridge Road

3.56 Stanmore Hill

- 83 -99 and 103 -105 and 111 - 113 (odds) Stanmore Hill

3.57 Canons Corner - London Road Junction

- 1 - 9 Canons Corner

Site Allocations Pre-Submission DPD

Site NP 20: Long Elmes



Site NP 21: Uxbridge Road - Kenton Lane Junction



Site NP 22: Stanmore Hill



Site NP 23: Cannons Corner - London Rd Junction



3.58 Kenton Lane - Three Meadows Mews

- 603 - 613 (odds) Kenton Lane
- 2 - 12 (evens) College Hill Road

3.59 Stations Parade - Cannons Park Station

- 1 - 23 Station parade, Whitchurch lane
- 1 Canons Park Station
- 229 Whitchurch lane

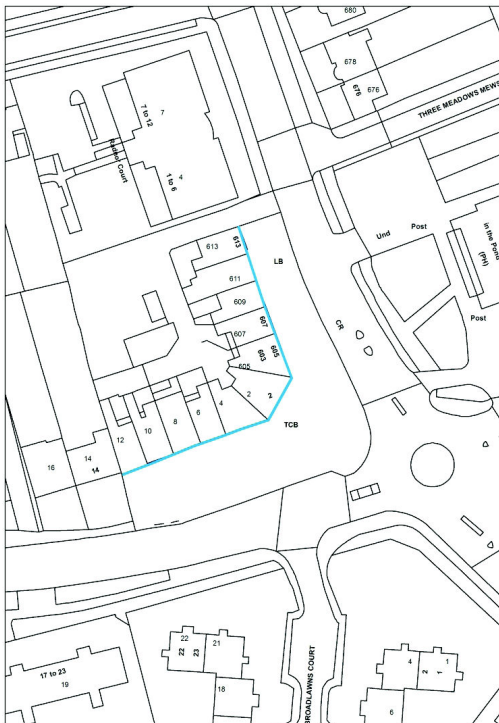
3.60 Whitchurch Parade

- 1- 13 Whitchurch Parade

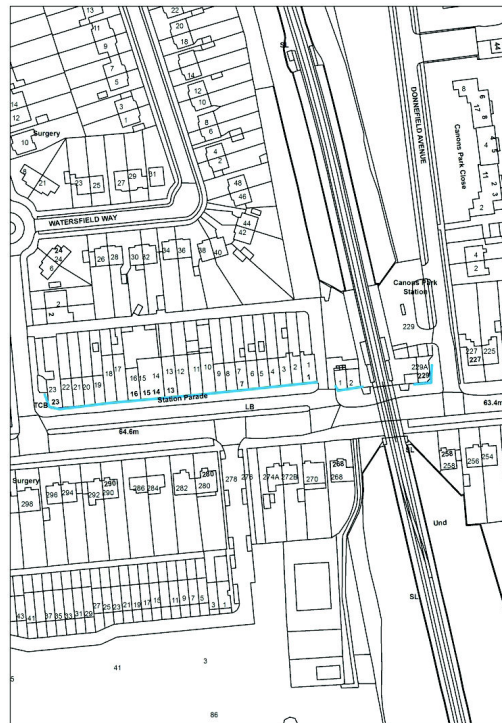
3.61 Chandos Crescent - Merlin Crescent

- 74, 80, 82 Chandos Crescent

Site NP 24: Kenton Lane - Three Meadows Mews



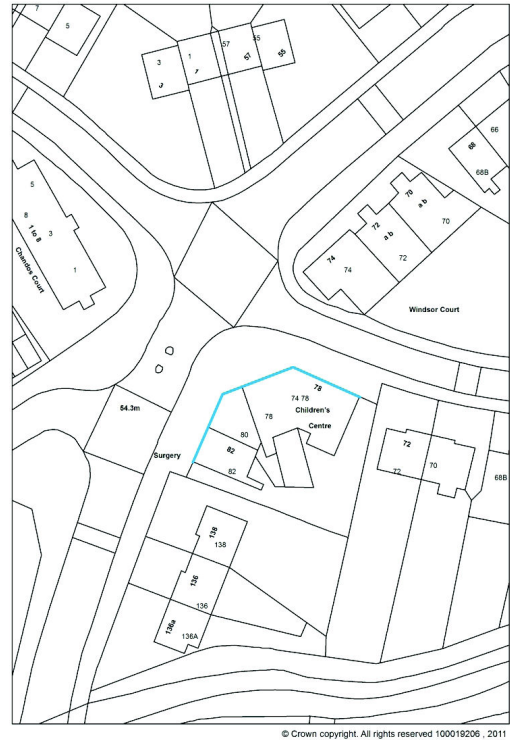
Site NP 25: Stations Parade - Cannons Park Station



Site NP 26: Whitchurch Parade



Site NP 27: Chandos Crescent - Merlin Crescent



4 Employment

Economic Development Issues

73 There are 64.567 hectares of designated employment land in the Borough, comprising 6.806 hectares allocated for business use and 57.761 hectares allocated for industrial and business use areas. These designated areas are shown on the Harrow proposals map. The pre-submission Core Strategy (2011) undertakes to monitor and manage the Borough's stock of employment land, with a sequential approach for release of surplus land giving first preference to the loss of non-designated sites, and provides for the controlled consolidation of the Wealdstone strategic industrial location (if appropriate) through the Area Action Plan for the Harrow & Wealdstone Intensification Area. The London Plan states that boroughs should identify strategic industrial locations on their proposals maps.

74 Planning Policy Statement 4: *Planning for Sustainable Economic Growth* (2009) advises local planning authorities not to carry forward existing site allocations from one development plan to the next without evidence of need. The Harrow Employment Land Study (2010) identifies a need to maintain employment land to support the continued functioning and development of the local economy, and for this reason existing business use and business & industrial use areas are to be largely retained. However a small number of changes to the boundaries of these designated employment sites are proposed, to reflect current circumstances in relation to these sites. In accordance with the London Plan, the extent of the Honeypot Lane strategic industrial location (industrial business park) is also shown, for inclusion on the proposals map. As noted above, the

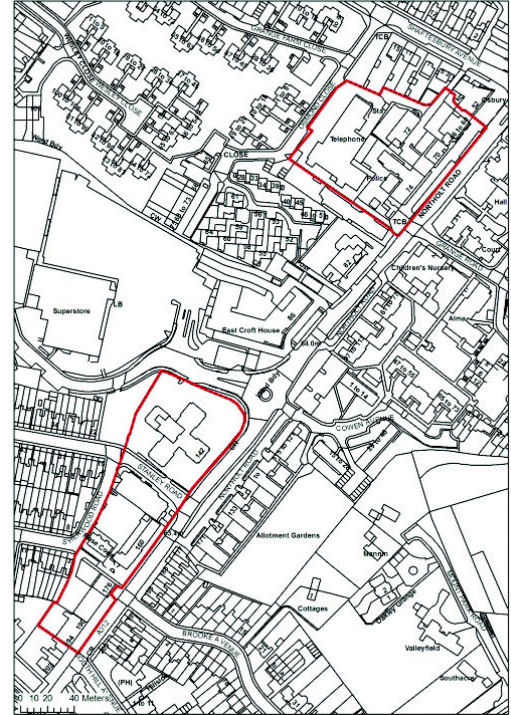
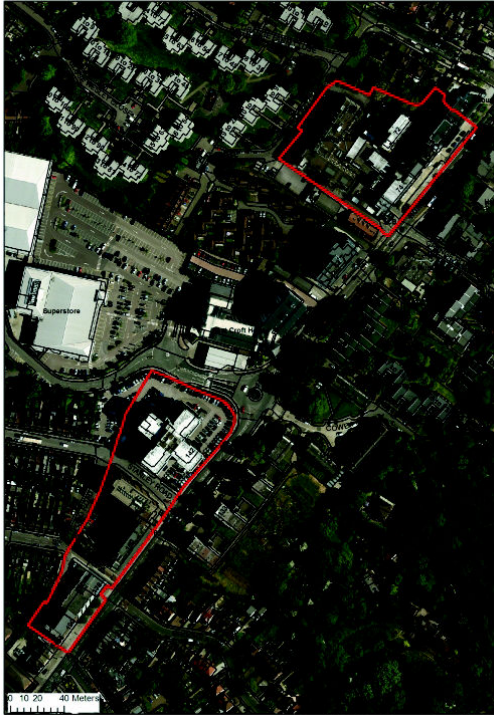
extent of the Wealdstone strategic industrial location (preferred industrial location) will be defined in the Area Action Plan for future inclusion on the proposals map and is not considered within the scope of this DPD.

75 The Core Strategy also has an objective to increase the number of jobs in Harrow, and so therefore it is necessary to allocate a number of sites that are appropriate for employment uses to help deliver this objective. Criteria for development on Industrial and Business Uses areas and Business Use Areas are included in the Development Management DPD and Area Action Plan.

Employment Led Development Sites

76 The following sites are identified as being suitable for predominantly employment led redevelopment, with an element of residential enabling development.

Site: EM1 Northolt Road Business Use Area (North and South)



Site Details

Site Area:	2.6 hectares
Existing Use:	Offices including Metropolitan Police Station
Housing Trajectory Status:	N/A
Number of Homes:	150
Other Uses Proposed:	Non-town centre economic uses
Ward:	Roxeth
Core Strategy Sub Area:	South Harrow

Planning Designations

Flood Zone:	Zone 1 (low probability)
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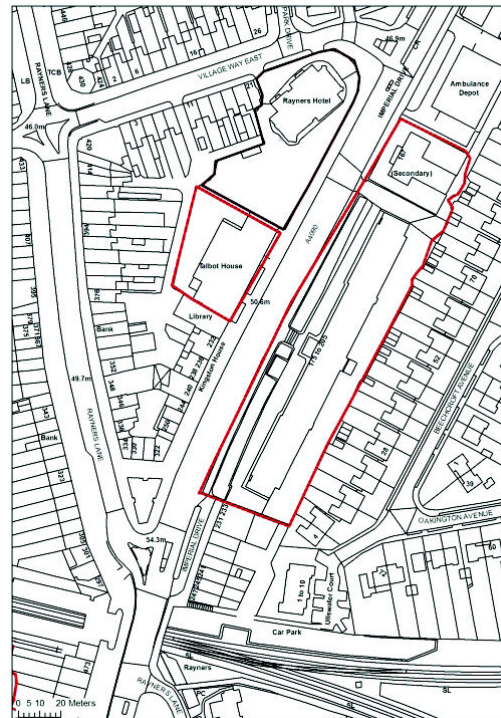
Site Allocations Pre-Submission DPD

Public Transport Accessibility Level:	4
Town Centre:	No
Employment Land:	Northolt Road business use area
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Northolt Road part of the London distributor road network

Commentary

77 The area is suitable for economic development (non town centre) uses with an enabling residential component.

Site: EM2 Rayners Lane Offices, Imperial Drive



Site Allocations Pre-Submission DPD

Site Details

Site Area:	1 Hectare
Existing Use:	Offices and College
Housing Trajectory Status:	N/A
Number of Homes:	150
Other Uses Proposed:	Non-town centre economic uses
Ward:	Rayners Lane
Core Strategy Sub Area:	Rayners Lane and North Harrow

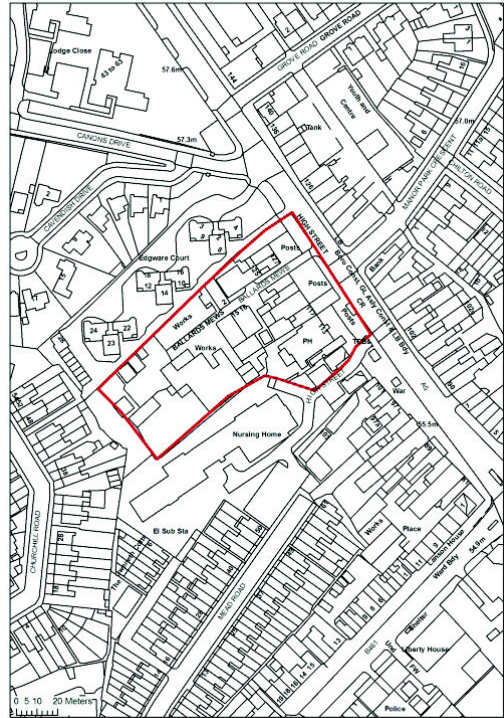
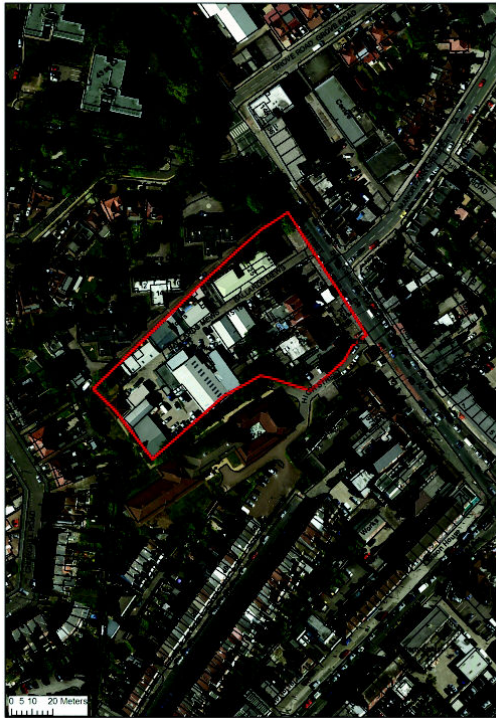
Planning Designations

Flood Zone:	No
Public Transport Accessibility Level:	3
Town Centre:	Yes
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	

Commentary

78 The area is suitable for economic development (non town centre) uses with an enabling residential component.

Site: EM3 Ballard Mews Estate, Edgware



Site Details

Site Area:	0.54 Hectare
Existing Use:	Industrial and Business
Housing Trajectory Status:	N/A
Number of Homes:	30
Other Uses Proposed:	Non-town centre economic uses
Ward:	Cannons
Core Strategy Sub Area:	Edgware and Burnt Oak

Planning Designations

Flood Zone:	No
Public Transport Accessibility Level:	3
Town Centre:	No

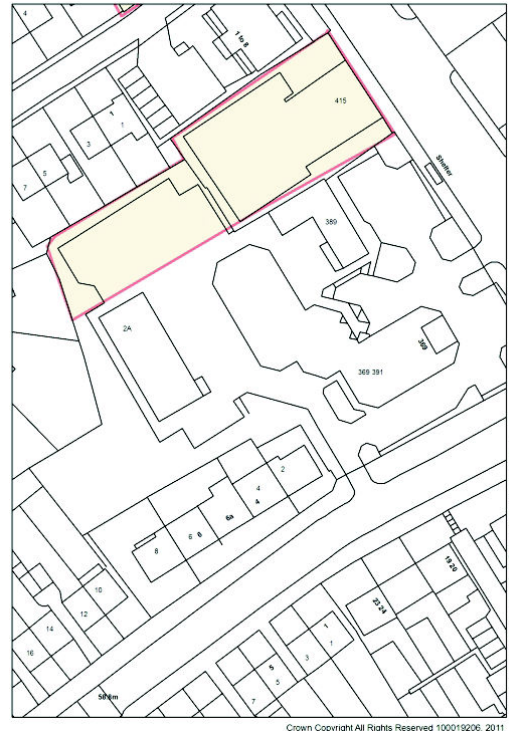
Site Allocations Pre-Submission DPD

Employment Land:	Ballard Mews Business Use Area
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	Yes (bordering onto the A5)
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	Yes (part)
Other:	

Commentary

79 The area is suitable for economic development (non town centre) uses with an enabling residential component.

Site EM4: 415 Burnt Oak Broadway



Site Details

Site Area: 0.15 hectares

Existing Use:	Motorbike Showroom
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	
Other Uses Proposed:	None
Ward:	Edgware
Core Strategy Sub Area:	Edgware and Burnt Oak

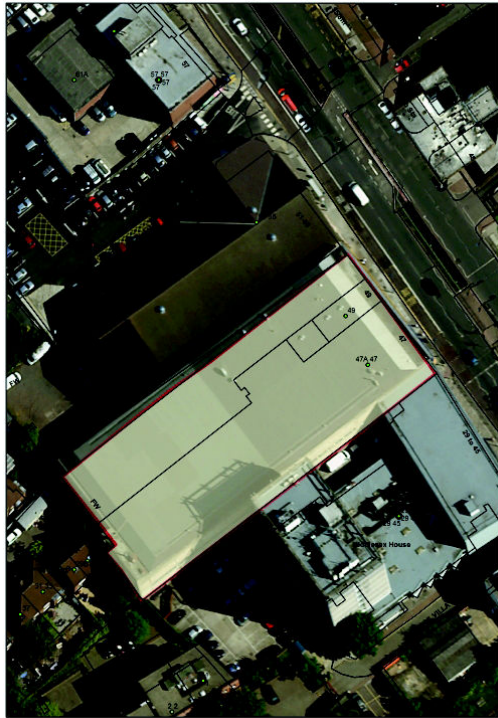
Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	5
Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No - Adjacent to a Grade 2 Listed Building
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	

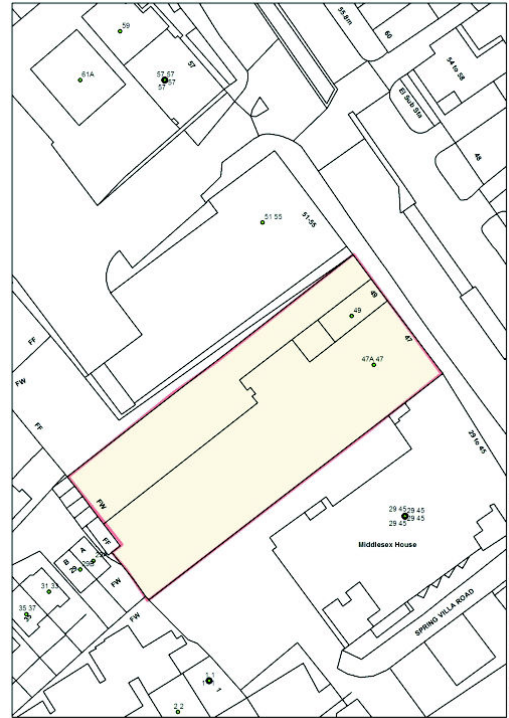
Relevant Planning History

80 The area is suitable for economic development (non town centre) uses with an enabling residential component.

Site EM5: 47 - 49 High Street, Edgware



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Site Details

Site Area:	0.26 hectares
Existing Use:	Warehousing and Entertainment
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	
Other Uses Proposed:	None
Ward:	Edgware
Core Strategy Sub Area:	Edgware and Burnt Oak

Planning Designations

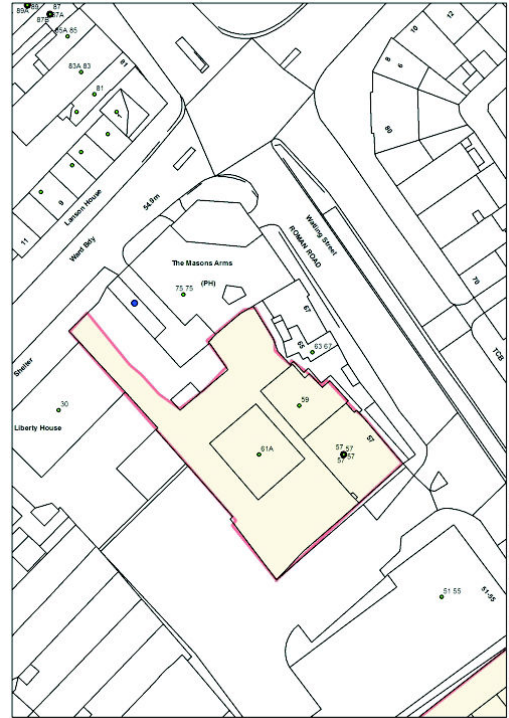
Flood Zone:	Zone 1 (low probability) with small area of the site in Zone 2 and 3
Public Transport Accessibility Level:	6a

Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	

Relevant Planning History

81 The area is suitable for economic development (non town centre) uses with an enabling residential component.

Site EM6: 57-59 High Street, Edgware



Site Details

Site Area:	0.18 Ha
Existing Use	Offices
Housing Trajectory Status:	N/A
Number of Homes:	
Other Uses Proposed:	Employment
Ward:	Edgware
Core Strategy Sub Area:	Edgware and Burnt Oak

Planning Designations

Flood Zone:	1
Public Transport Accessibility Level:	5
Town Centre:	Yes (part)
Employment Land:	No

Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	Yes
Other:	

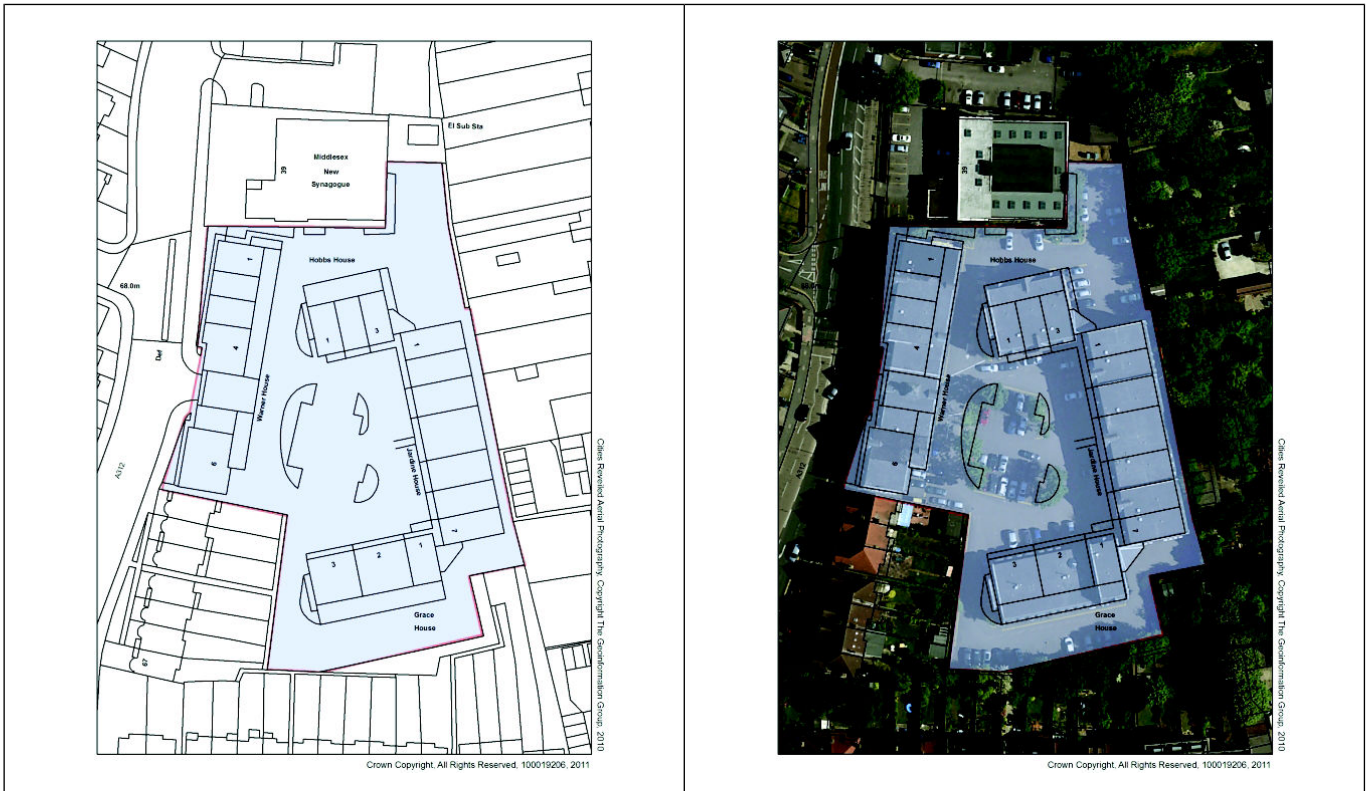
Relevant Planning History

82 The area is suitable for economic development (including town centre) uses with an enabling residential component.

Employment and Industrial Use Areas

New Business Use Area

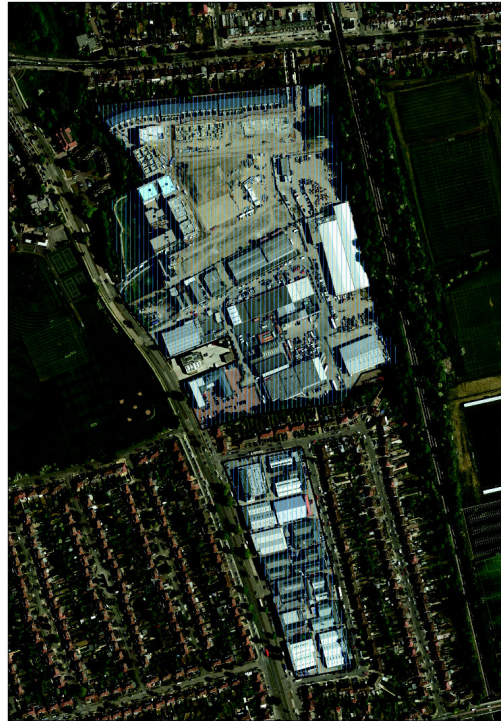
83 A new business use area is proposed at Harrovian Business Village, to reflect the business use nature of the site. The proposed site lies just to the south of Harrow town centre, and has a number of small office spaces in modern, purpose built buildings.



Changes to Honeypot Lane Industrial & Business Use Area

84 To reflect the extent of the Stanmore Place residential development currently under construction on the northern section of the Honeypot Lane strategic industrial location, the Council has removed the industrial and business use designation from the corresponding part of the area.

**Picture 4.1 Existing Extent of the
Honeypot Lane Industrial &
Business Use Area**



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**Picture 4.2 New Extent of the
Honeypot Lane Industrial &**

**Picture 4.3 New Extent of the
Honeypot Lane Industrial &**

Business Use Area - area to north removed



Business Use Area - area to north removed



Changes to Brember Road Industrial & Business Use Area

85 To reflect the extent of The Arc residential development recently completed on the western section of the Brember Road industrial and business use area, the Council has removed the designation from the corresponding part of the area. The designation has also been revised to correct an error on the existing boundary which results in part of the designation extending over part of the Retail Park and neighbouring houses in Wesley Close.

Picture 4.4 Existing Extent of the Brember Road Industrial & Business Use Area



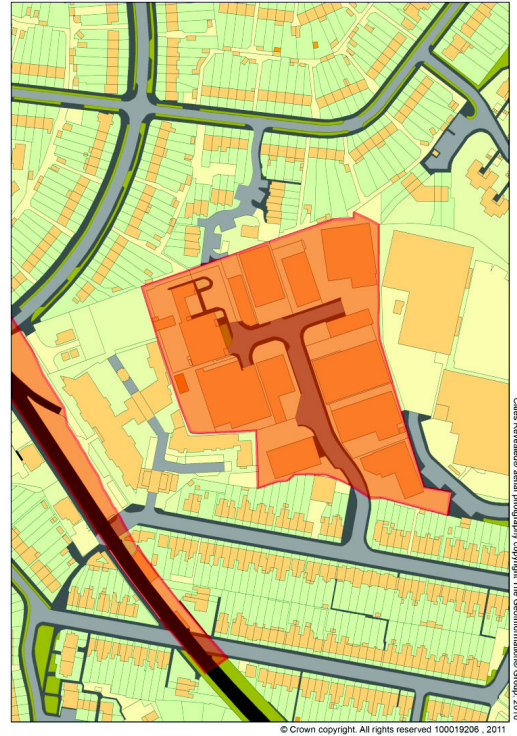
Picture 4.5 New Extent of the Brember Road Industrial & Business

Picture 4.6 New Extent of the Brember Road Industrial & Business

Use Area - areas to east and west removed



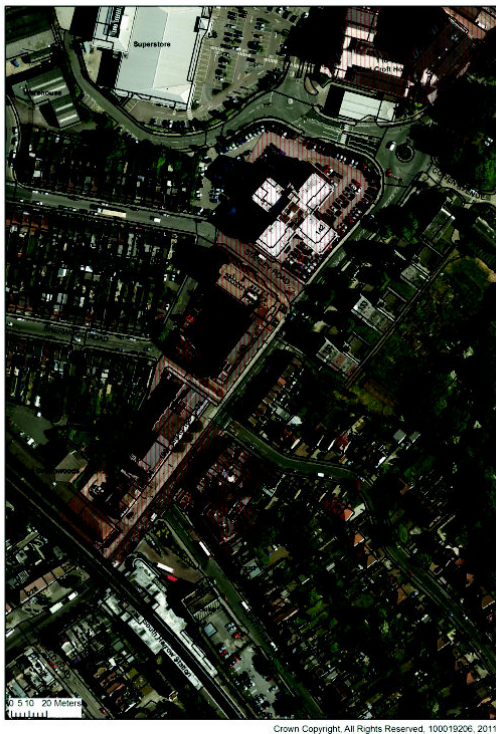
Use Area - areas to east and west removed



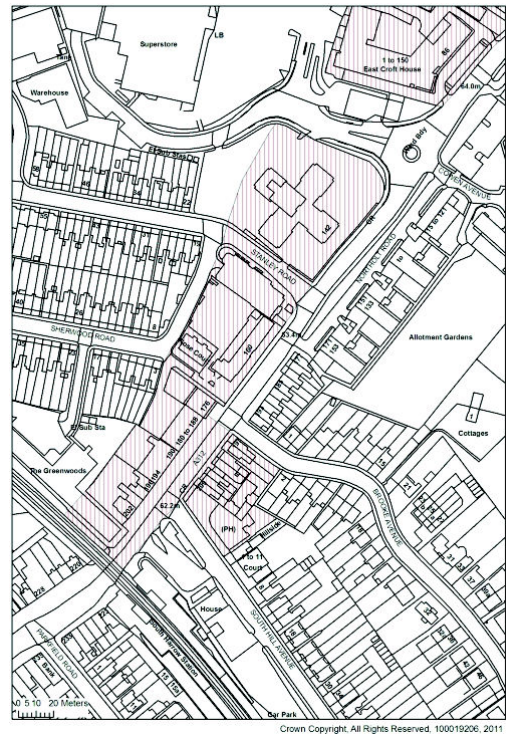
Changes to Business Use Area Northolt Road (South Section)

86 To reflect proposed housing site on the south side of Northolt Road, and the present retail use and pub frontages on the South and North side, the Council has removed the Business Use designation from these small areas.

Picture 4.7 Existing Extent of Northolt Road Business Use Area (South)



Picture 4.8 Existing Extent of Northolt Road Business Use Area (South)



Picture 4.9 New Extent of Northolt Road Business Use Area (South)



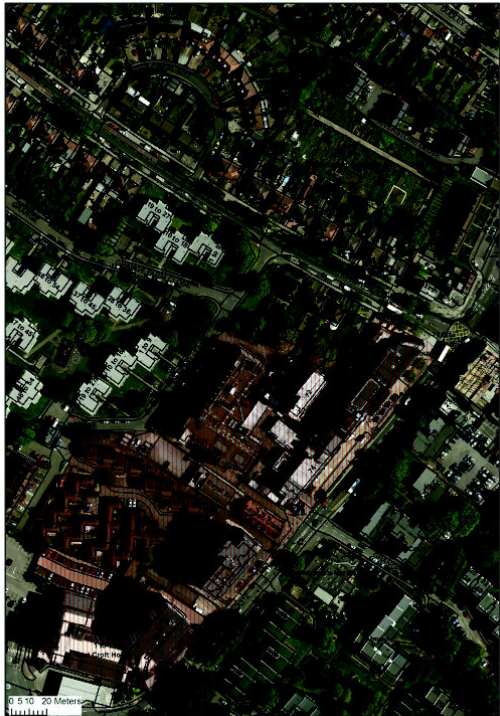
Picture 4.10 New Extent of Northolt Road Business Use Area (South)



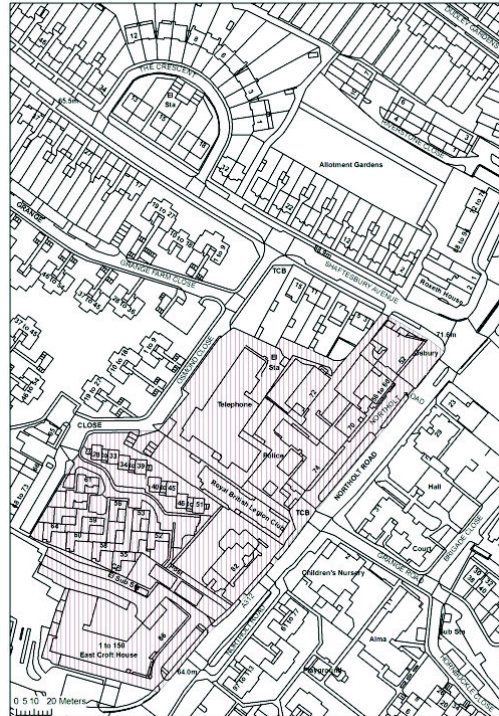
Changes to Business Use Area Northolt Road (North Section)

87 To reflect both existing and proposed housing sites on the north side of Northolt Road, the Council has removed the Business Use designation from these areas.

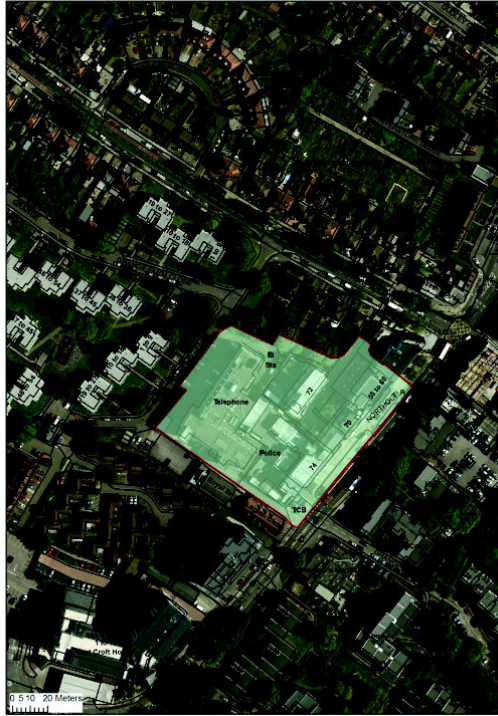
Picture 4.11 Existing Extent of Northolt Road Business Use Area (North)



Picture 4.12 Existing Extent of Northolt Road Business Use Area (North)

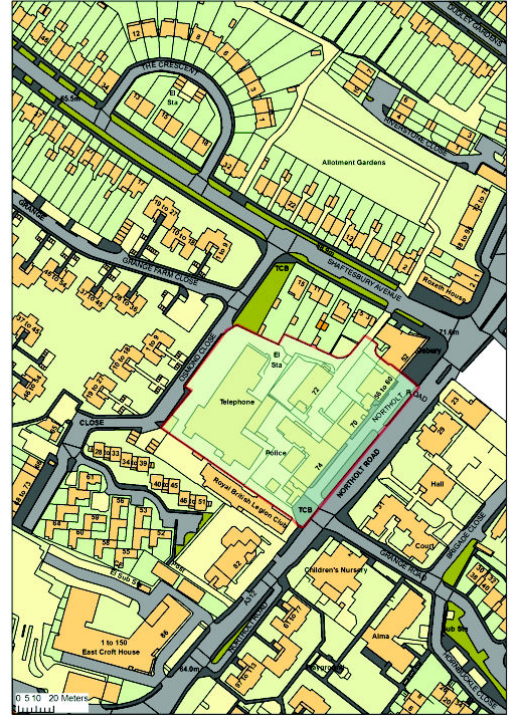


Picture 4.13 New Extent of Northolt Road Business Use Area (North)



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Picture 4.14 New Extent of Northolt Road Business Use Area (North)



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5 Mixed Use and Housing

5.1 The Harrow Core Strategy (2012) provides a commitment to deliver at least 6,050 net additional homes throughout the Borough over the seventeen year period from 2009 to 2026. The Strategy attributes a delivery target of at least 2,800 homes to the Harrow & Wealdstone Intensification Area, leaving a balance of at least 3,250 to be delivered on land outside of the Intensification Area. This chapter identifies sufficient, previously-developed sites⁰ to provide a net increase of 1,768 homes. A net addition of 772 homes has already been delivered during the two years of 2009/10 and 2010/11. Together with a pipeline supply of sites with planning permission sufficient to provide a net increase of 1,087 homes⁰, identified capacity outside of the Intensification Area totals 3,627 net new homes. A detailed housing schedule is provided at Appendix 1.

5.2 The sites identified for allocation have come forward from a number of sources. A 'call for sites' exercise was carried out [dates] both to inform the preparation of Harrow's Core Strategy and the Council's participation in the Greater London Authority's Strategic Housing Land Availability Assessment/Housing Capacity Study (2009). Large sites with planning permission but which have not yet been developed are included where there would be no conflict with the Harrow Core Strategy (2012). And other sites for allocation have emerged from pre-application discussions, from previous LDF consultations or have been identified by Council officers as suitable for development and deliverable.

Including a small number of major, previously developed sites within the Green Belt. Of which 855 are already underway.

5.3 Where the potential housing capacity of a site is already known, either through the an existing planning permission or pre-application discussions, this has formed the basis of the allocation of that site. On other sites, the potential capacity has been estimated by the Council using the London Plan sustainable residential quality density matrix. The methodology for estimating capacity in accordance with the matrix is set out at Appendix 2.

5.4 Most of the sites identified for allocation as housing sites are suitable only for residential development. However a number of the sites identified are suitable for housing only as part of mixed use development, and their allocation in this chapter should not be interpreted as indicated that they are suitable for 100% residential development. Of particular note are sites H4, H5, H12 and H25 which comprise employment-led regeneration in the Harrow Core Strategy, but which are nevertheless included here as they have a significant potential housing capacity.

5.5 The following sites have not been carried forward from the consultation Draft Site Allocations DPD (2011) for the reasons shown:

- Harrow Police Station, 74 Northolt Road, South Harrow⁰: this site has now been omitted to avoid 'double counting' as it forms part of the Northolt Road business use area (north) employment-led regeneration area.
- 90-100 Pinner Road, Harrow⁰: the development of this site is now underway and it therefore constitutes part of the pipeline supply of housing.
- Mill Farm Close Estate, Pinner⁰: the development of the site is now underway and it therefore constitutes part of the pipeline supply of housing.
- 287-293 Whitchurch Lane, Edgware⁰: the site has been cleared and its capacity has therefore been counted as part of the pipeline supply of housing.

The rest of this chapter identifies the boundary of each site together with a summary of the site details, planning designation and any relevant planning history. The sites are arranged in relation to the following areas, based on the policy sub areas identified in the Core Strategy (2012):

- Harrow-on-the-Hill & Sudbury Hill;
- South Harrow;
- Rayners Lane & North Harrow;
- Pinner & Hatch End;
- Stanmore & Harrow Weald;
- Edgware & Burnt Oak; and
- Harrow & Wealdstone (excluding sites within the Intensification Area, which will be identified through the separate Area Action Plan development plan document).

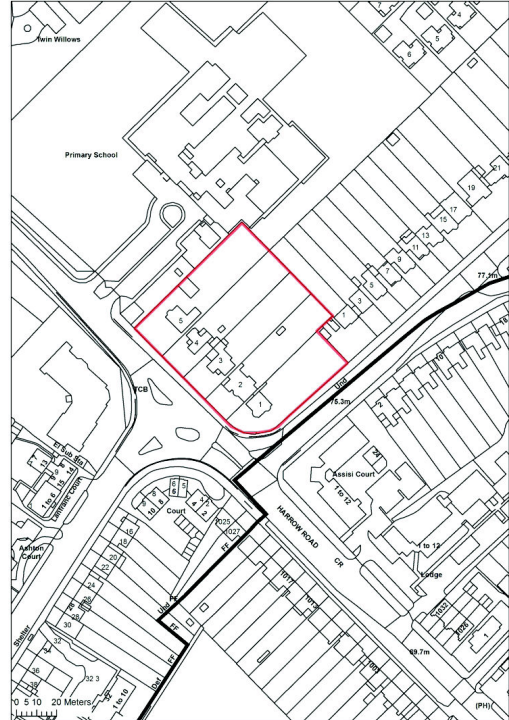
Note that no sites have been identified within the Kingsbury & Queensbury and Kenton & Belmont sub areas.

Site H3 in the consultation Draft Site Allocations DPD
 Site H9 in the consultation Draft Site Allocations DPD
 Site H15 in the consultation Draft Site Allocations DPD
 Site H24 in the consultation Draft Site Allocations DPD

Harrow on the Hill and Sudbury Hill Sub Area

Sites With Planning Permission

SITE H1: 1-5 SUDBURY HILL, HARROW, HA1 3SB



Site Details

Site Area:	0.64 hectares
Existing Use:	Five detached houses
Number of Homes (gross):	54
Number of Homes (net):	49
Other Uses Proposed:	None
Ward:	Harrow-on-the-Hill
Core Strategy Sub Area:	Harrow-on-the-Hill and Sudbury Hill

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	2-3

Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Greenford Road/Sudbury Court Drive part of the London distributor road network; Sudbury Hill part of the Borough distributor road network

Relevant Planning History

5.6 On 13th October 2010 the Council resolved to grant planning permission (subject to a legal agreement) for the demolition of five detached dwellinghouses and the construction of fifty-four flats with solar panels and satellite receivers at roof level, and underground parking to provide 54 spaces (P/1989/09).

Commentary

5.7 The site is suitable only for residential development.

Sites Without Planning Permission

SITE H2: 94-110 GREENFORD ROAD, HARROW, HA1 3QL



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Site Details

Site Area:	0.047 hectares
Existing Use:	Timber yard
Number of Homes (gross):	23
Number of Homes (net):	23
Other Uses Proposed:	None
Ward:	Harrow-on-the-Hill
Core Strategy Sub Area:	Harrow-on-the-Hill and Sudbury Hill

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	2-3
Town Centre:	No

Employment Land:	Non designated employment site
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Greenford Road part of the London distributor road network

Relevant Planning History

5.8 Not known

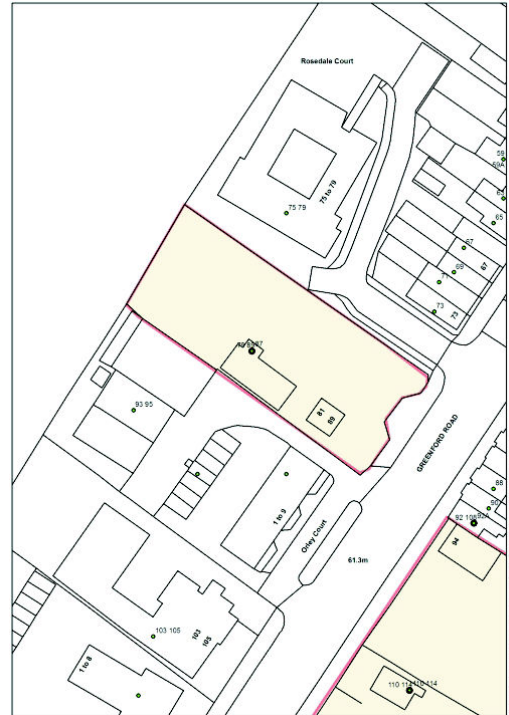
Commentary

5.9 The site is suitable for residential development only.

SITE H3: 79-89 GREENFORD ROAD, HARROW, HA1 3QF



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Site Details

Site Area:	0.14 hectares
Existing Use:	Timber Yard
Number of Homes (gross):	23
Number of Homes (net):	23
Other Uses Proposed:	None
Ward:	Harrow on the Hill
Core Strategy Sub Area:	Harrow Hill and Sudbury Hill

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	3
Town Centre:	No

Employment Land:	Non designated employment site
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Greenford Road part of the London distributor road network

Relevant Planning History

5.10 Not known

Commentary

5.11 The site is suitable for residential development only.

South Harrow Sub Area

Sites Without Planning Permission

SITE H4: 205-209 NORTHOLT ROAD, SOUTH HARROW, HA2 0NG



Site Details

Site Area:	0.027 hectares
Existing Use:	Derelict
Number of Homes (gross):	10
Number of Homes (net):	10
Other Uses Proposed:	None
Ward:	Roxeth
Core Strategy Sub Area:	South Harrow

Planning Designations

Flood Zone:	Zone 1 (low probability) check
Public Transport Accessibility Level:	4

Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Northolt Road part of the London distributor road network

Relevant Planning History

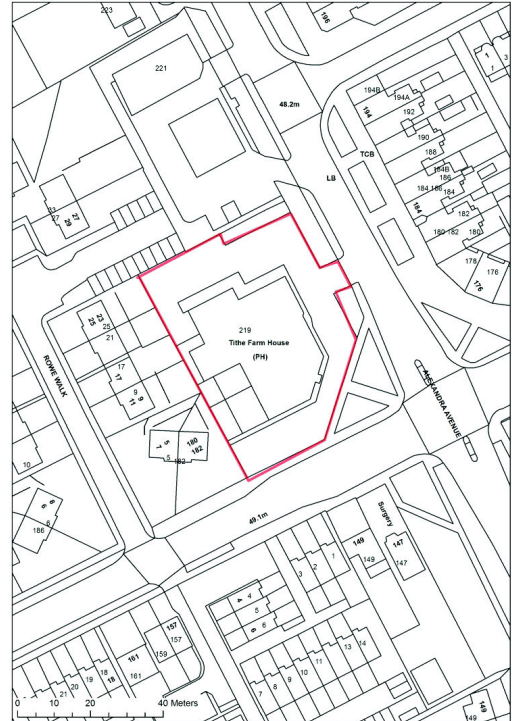
5.12 On 9th September 2003 the Council adopted as supplementary planning guidance a development brief to bring forward [what?] at this site. A subsequent planning application for the redevelopment of the site consisting of A3/B1 uses at ground floor level and 11 flats above, together with two flats fronting Brooke Avenue, was refused in January 2005 (P/2461/04). [any further details? Reasons for refusal?]

Commentary

5.13 The site previously formed part of the Northolt Road business use area and was identified in the Harrow Unitary Development Plan (2004) as proposals site 21 for housing, B1 offices and A1 uses. Reflecting the focus on office consolidation and renewal in Harrow town centre, and the potential for a mix of uses and diversification throughout the rest of the rest of the Northolt Road business use area, the business use area designation has been removed from this site (see Chapter 3) and it B1 office use is therefore no longer sought. In view of the proximity of South Harrow district centre and the nearby neighbourhood parade, neither is it considered necessary to provide any ground floor retail frontage.

5.14 HERE

Site H5: The Matrix Public House, Eastcote Lane, South Harrow



Site Details

Site Area:	0.28 hectares
Existing Use:	Vacant site (formerly a public house)
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	29
Other Uses Proposed:	None
Ward:	Roxbourne
Core Strategy Sub Area:	South Harrow

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	2

Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Alexandra Avenue part of the London distributor road network Eastcote Lane part of the Borough distributor road network

Relevant Planning History

5.15 On 25th January 2011 the Council received a planning application for the construction of a three storey building (with accommodation in the roof space) to provide an 85-bed care home, with landscaping and car parking at the rear.

Commentary

5.16 The site is suitable for residential development only.

Site H6: 1/1A Silverdale Close, Northolt

Picture 5.1



Picture 5.2



Site Details

Site Area:	0.092 hectares
Existing Use:	Former children's home/contact centre
Housing Trajectory Status:	N/A
Number of Homes:	5
Other Uses Proposed:	None
Ward:	Roxeth
Core Strategy Sub Area:	South Harrow

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	3
Town Centre:	No

Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

Relevant Planning History

5.17 On 8th December 2009 the Council granted planning permission for the continued use of the former children's home (class C2) as a contact centre (class D1) and the change of use of the first floor from a children's home to a children's centre, together with single and two storey front, side and rear extensions (P/2230/09).

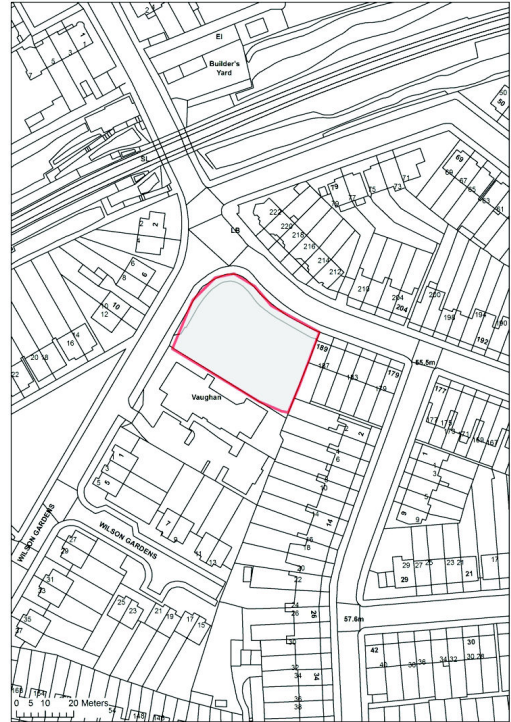
Commentary

5.18 The site is suitable for residential development only.

Rayners Lane and North Harrow Sub Area

Sites with Planning Permission

Site H7: Former Vaughan Centre (part), Wilson Gardens, West Harrow



Site Details

Site Area:	0.114 hectares
Existing Use:	Vacant (formerly the Vaughan Centre)
Housing Trajectory Status:	Schedule 1 (new build site with planning permission) (site 1866)
Number of Homes:	13
Other Uses Proposed:	None
Ward:	West Harrow
Core Strategy Sub Area:	Rayners Lane and North Harrow

Planning Designations

Flood Zone:	Part Zones 2 and 3 (medium and high probability)
Public Transport Accessibility Level:	2
Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No (but part of an area of deficiency in access to nature conservation)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Part of UDP Proposal Site 40: Vaughan Centre, Vaughan Road/Wilson Gardens (for community use)

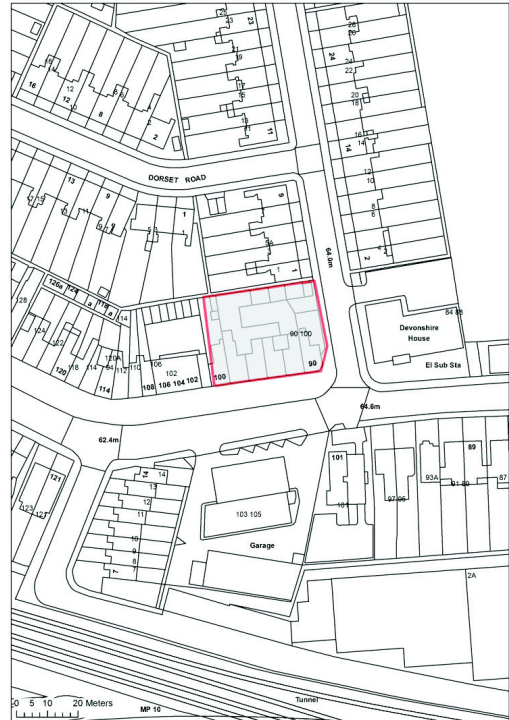
Relevant Planning History

5.19 The site forms approximately half of the larger site formally occupied by the Vaughan Centre the subject of UDP Proposal Site 40 (see above). On 27th September 2007 planning permission was granted for a single and two storey neighbourhood resource centre with associated parking and access on the other half of the site (P/2265/07). On the remaining part of the site the subject of this proposal allocation, planning permission for the construction of fifteen flats in a three storey block with landscaping, refuse & cycle storage and eight parking spaces was refused on 7th November 2008 (P/2721/08); a subsequent application for the construction of a part two, part three storey development comprising thirteen flats with landscaping, refuse & cycle storage and parking was granted 11th November 2009 (P/1733/09).

Commentary

5.20 The site is suitable for residential use, but the location of development on the site will need to be directed to the parts of lower flood risk.

Site H8: 90-100 Pinner Road, Harrow



Site Details

Site Area:	0.062 hectares
Existing Use:	Ancillary offices above vacant motor vehicle showroom
Housing Trajectory Status:	Schedule 1 (new build site with planning permission) (site 1767)
Number of Homes:	12
Other Uses Proposed:	None
Ward:	Headstone South
Core Strategy Sub Area:	Rayners Lane and North Harrow

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	2
Town Centre:	Pinner Road neighbourhood parade

Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No (but part of an area of deficiency in access to nature conservation)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Pinner Road part of the London distributor road network

Relevant Planning History

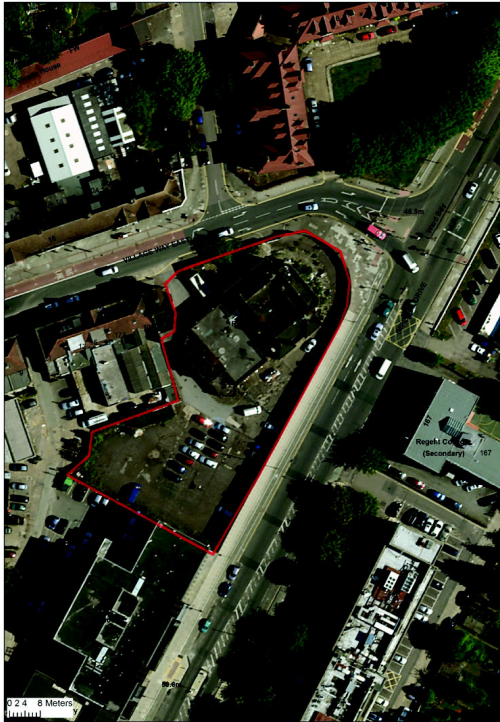
5.21 Planning permission granted for a roof extension to create a second floor and the conversion of the first floor to provide twelve flats granted 7th February 2008 (P/4111/07).

Commentary

5.22 The site is be suitable for comprehensive mixed-use development comprising residential and small scale retail or other appropriate uses on the ground floor to maintain the active frontage of this neighbourhood parade.

Sites without Planning Permission

Site H9: Rayners Public House



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Site Details

Site Area:	0.32 hectares
Existing Use:	Disused Public House and car park
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	20
Other Uses Proposed:	Public House or other appropriate town centre/community uses (see below)
Ward:	Rayners Lane
Core Strategy Sub Area:	Rayners Lane and North Harrow

Planning Designations

Flood Zone:	Zone 2 & 3 (medium and high probability)
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Public Transport Accessibility Level:	1b
Town Centre:	Rayners Lane district centre
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	Grade II listed
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Imperial Drive part of the London distributor road network Village Way East part of the Borough distributor road network

Relevant Planning History

5.23 On 25th September 2003 a planning application was submitted for partial demolition works and the erection of a three storey building (linked to the public house) to provide a hotel, and the introduction of guest rooms to the public house to form mixed class A3/C1 use, and parking (P/1965/03). The application was withdrawn on 11th March 2004.

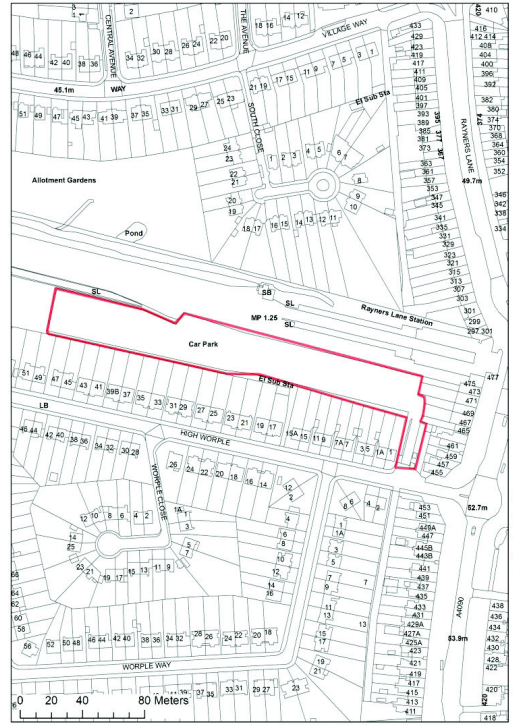
Commentary

5.24 The Rayners Public House is of special interest as a 1930s public house, with many of its architectural details and internal plan form largely intact. The restoration of this building to use as a public house, or other appropriate town centre/community uses which preserve its special interest and allow public access to the interior, is sought taking into account the Grade 2 listing and the buildings setting. Sensitive residential redevelopment of the car park is appropriate, and should contribute to the listed building's restoration and (if necessary) help to secure its future. This site has been identified within the London Borough of Harrow's Strategic Flood Risk Assessment (SFRA) as being within flood zones 2 and 3a.

Developers should submit a Flood Risk Assessment (FRA) to the Council that is in accordance with Planning Policy Statement 25 (PPS25) and the guidance on Site-Specific Flood Risk Assessments (FRA) for Flood Zone 3a within Harrow's SFRA (Section 7.1.1, Pg 31). As the proposed land use is residential and classified as a 'more vulnerable' land use, the Exception test must also be passed.

5.25 There is a culverted ordinary watercourse which runs in close proximity to this site. The exact location of this watercourse should be determined at the earliest opportunity to ensure that no buildings are built over or within 5 metres of its outer walls. Identifying the exact watercourse location will enable any buffer zones or potential restoration to be factored in to the site design. If the culverted ordinary watercourse is actually located within the site boundary then all opportunities to de-culvert the watercourse should be sought and the provision of a minimum 5 metre undeveloped buffer strip provided from the top of bank of the watercourse. This is in line with Harrow's Core Strategy and Policy 15 of the Draft Development Management DPD.

Site H10: Land at Rayners Lane Station, High Worples, Rayners Lane



Site Details

Site Area:	0.72
Existing Use:	Transport for London car park (Rayners Lane station)
Housing Trajectory Status:	N/A
Number of Homes:	12
Other Uses Proposed:	Retention of adequate car parking provision
Ward:	Rayners Lane
Core Strategy Sub Area:	Rayners Lane and North Harrow

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	4
Town Centre:	Rayners Lane district centre

Site Allocations Pre-Submission DPD

Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	Part of Site of Importance for Nature Conservation (borough importance grade II)
Listed Building/Conservation Area:	Rayners Lane Station grade II listed; adjacent to Rayners Lane Conservation Area
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

Relevant Planning History

5.26 No relevant planning history.

Commentary

5.27 The site comprises a narrow strip of land between the rear gardens of dwellings in High Worple and the embankment of the Piccadilly/Metropolitan lines (Uxbridge branch). Access is from High Worple close to the junction with Alexandra Avenue. The western part of the site forms part of a Site of Importance for Nature Conservation which extends beyond the surface car park. The site is suitable for residential development with the retention of adequate parking and no harm to biodiversity.

5.28 There is a need to ensure that the setting of the Rayners Lane Conservation Area and Rayners Lane Station grade II listed building are considered in any application for development so as not to harm these heritage assets.

5.29 It should be noted that the site lies directly on a secondary aquifer, the groundwater in which may be in hydraulic conductivity with the chalk principal aquifer. Therefore any planning application for this site must include a Preliminary risk assessment to assess if land contamination may be present at the site. This should be submitted with the planning application. The PRA needs to include information on past and current uses, if sensitive controlled waters receptors are present and if the site could pose a pollution risk. The PRA should also consider if any aspects of the proposed development could pose a pollution risk should contamination be present (i.e. deep drilling to facilitate the installation of foundation piles, site drainage). Further work such as an intrusive site investigation may be required depending on the findings of the PRA.

5.30 We recommend that developers should:

1. Follow the risk management framework provided in CLR11, 'Model Procedures for the Management of Land Contamination', when dealing with land potentially affected by contamination;

2. Refer to The Environment Agency's 'Guiding Principles for Land Contamination' documents for the type of information that should be included in a PRA;
3. Refer to the Environment Agency's 'Groundwater Protection: policy and practice (GP3)' documents.

Site H11: North Harrow Library and Children's Services, 429/433 Pinner Road, North Harrow



Site Details

Site Area:	0.122 hectares
Existing Use:	Public Library and Council Offices
Housing Trajectory Status:	N/A
Number of Homes:	18
Other Uses Proposed:	None
Ward:	Headstone South
Core Strategy Sub Area:	Rayners Lane and North Harrow

Planning Designations

Flood Zone:	Zone 1 and 2 (low and medium probability)
Public Transport Accessibility Level:	3
Town Centre:	North Harrow district centre

Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Pinner Road part of the London distributor road network

Relevant Planning History

5.31 Not known

Commentary

5.32 The site is suitable for mixed use residential and town centre use development including appropriate provision for a replacement library.

5.33 The site has been identified as being within Flood Zone 2 within Harrow Strategic Flood Risk Assessment (SFRA).The site should be developed in accordance with the development recommendations made within Harrow’s Level 2 SFRA (page 30).
The sequential approach to site layout should be adopted and all more vulnerable' development should be directed where possible to those parts of the site within Flood Zone 1.

Site H12: Enterprise House, 297 Pinner Road, North Harrow



Site Details

Site Area:	0.137 hectares
Existing Use:	Harrow in Business premises
Housing Trajectory Status:	N/A
Number of Homes:	6
Other Uses Proposed:	None
Ward:	Headstone South
Core Strategy Sub Area:	Rayners Lane and North Harrow

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	3
Town Centre:	No
Employment Land:	Non designated employment site

Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Pinner Road part of the London distributor road network

Relevant Planning History

5.34 Not known

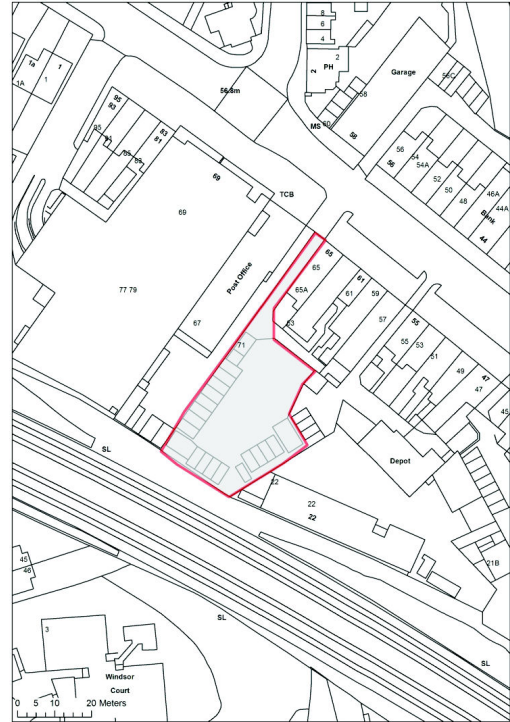
Commentary

5.35 The site is suitable for residential development.

Pinner and Hatch End Sub Area

Sites with Planning Permission

Site H13: Rear of 57-65 Bridge Street, Pinner



Site Details

Site Area:	0.118 hectares
Existing Use:	Car Repair Garage (B2)
Housing Trajectory Status:	Schedule 1 (new build site with planning permission) (site 1775)
Number of Homes:	30
Other Uses Proposed:	None (but see below)
Ward:	Pinner
Core Strategy Sub Area:	Pinner and Hatch End

Planning Designations

Flood Zone:	Zone 1 (low probability)
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Public Transport Accessibility Level:	2-3
Town Centre:	Pinner District Centre
Employment Land:	Non-designated industrial premises
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	Pinner Village Archaeological Priority Area
Other:	UDP Service Road Proposal 5 (Rear of Bridge Street to Chapel Lane)

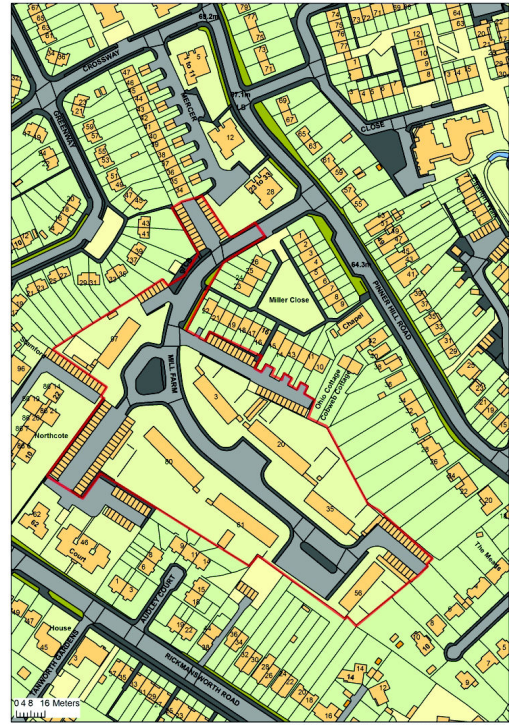
Relevant Planning History

5.36 Planning permission for the demolition of existing disused timber-framed, steel-roofed buildings and redevelopment for 30 flats with associated amenity space and two disabled persons' car parking bays was allowed, on appeal, on 25th February 2008 (P/1907/07). A further planning permission was granted for a revised scheme comprising 26 flats on 17th December 2010(P/1966/09). On 26th January 2011 a planning application was received to extend the time limit for the implementation of planning permission P/1907/07 allowed on appeal.

Commentary

5.37 The site is suitable for a mix of uses comprising residential and appropriate town centre uses.

Site H14: Mill Farm Close



Site Details

Site Area:	2.1 hectares
Existing Use:	Residential estate (local authority)
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	158
Other Uses Proposed:	None
Ward:	Pinner
Core Strategy Sub Area:	Pinner and Hatch End

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	1b
Town Centre:	No

Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	Yes (part of Grim's Dyke)
Other:	None

Relevant Planning History

5.38 Planning permission for the redevelopment of the estate to provide 158 homes (flats and houses), alterations to Mill Farm Close access road, the creation of communal green space, equipped play areas, associated landscaping, car parking and refuse storage, was granted by the Council on 27th April 2010.

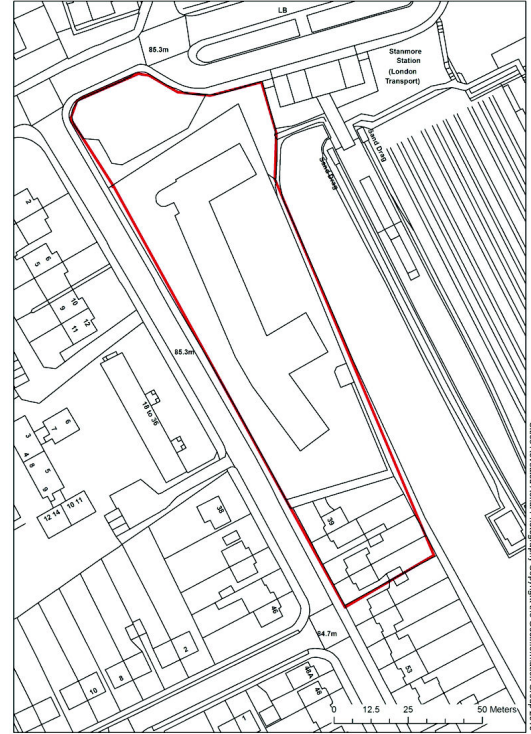
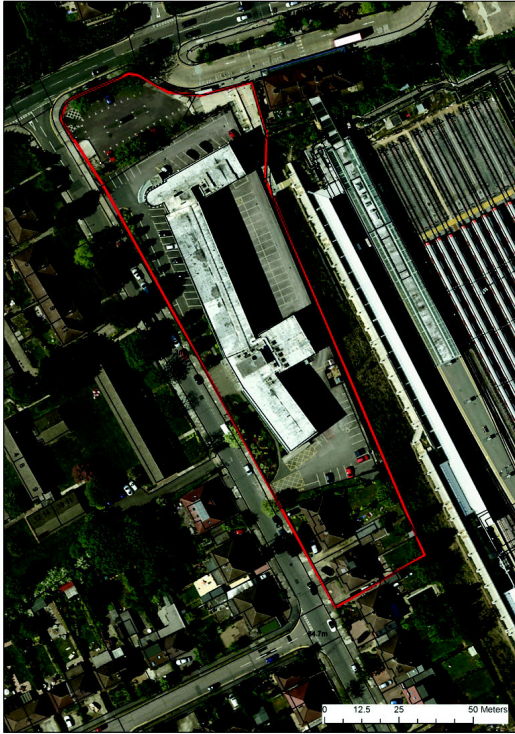
Commentary

5.39 The site is suitable only for residential development.

Stanmore and Harrow Weald Sub Area

Sites with Planning Permission

Site H15: Jubilee House, Merrion Avenue, Stanmore



Site Details

Site Area:	0.57 hectares
Existing Use:	Office (B1)
Housing Trajectory Status:	Schedule 1 (new build site with planning permission) (site 1778)
Number of Homes:	35
Other Uses Proposed:	None (but see below)
Ward:	Canons
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
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Public Transport Accessibility Level:	2-3
Town Centre:	No
Employment Land:	Non-designated office premises
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	Adjacent to Site of Importance for Nature Conservation (borough importance grade II)
Listed Building/Conservation Area:	Adjacent to Kerry Avenue Conservation Area and Stanmore Station (locally listed)
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Adjacent to UDP Proposal Site 24: Land at Stanmore Station (for residential or B1 use with the retention of the station and adequate car parking) London Road part of the London distributor road network

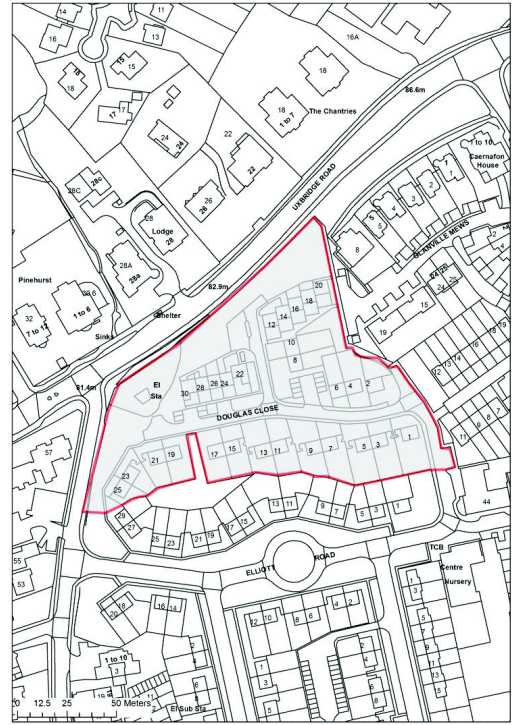
Relevant Planning History

5.40 Planning permission granted 27th September 2007 for two and part three storey extension to office building to provide thirty five flats involving alterations to existing elevations, new landscaping treatment, enhanced car parking layout and cycle storage provision (P/1220/07). The planning permission was renewed with a decision being issued on 23rd May 2011 (LPA Ref. P/1444/10).

Commentary

5.41 The site is suitable for comprehensive redevelopment incorporating a mix of uses. The setting of the adjoining Kerry Avenue Conservation Area and locally listed Stanmore Station should be considered in any application for this site.

Site H16: Douglas Close Redevelopment



Site Details

Site Area:	2.04 hectares
Existing Use:	Residential (former RAF housing)
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	79
Other Uses Proposed:	None
Ward:	Stanmore Park
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 2 & 3 (medium and high probability)
Public Transport Accessibility Level:	1b
Town Centre:	No

Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	London Road part of the London distributor road network

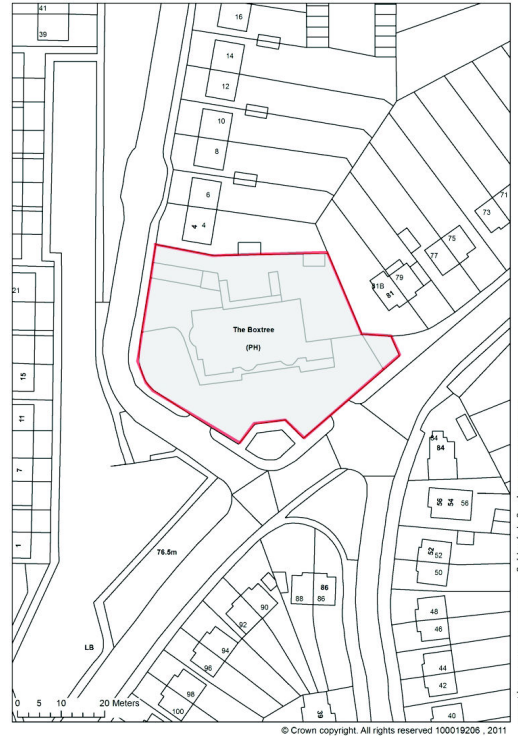
Relevant Planning History

5.42 On 8th October 2010 the Council granted planning permission for redevelopment to provide 53 flats in five four-storey blocks, 26 two storey dwellings and the provision of 80 car parking spaces, 79 cycle parking spaces and landscaping (P/1794/10).

Commentary

5.43 The site is suitable for residential development only. Development should be located away from areas of highest flood risk with higher vulnerable uses located in the area of lowest risk.

Site H17: The Boxtree Public House



Site Details

Site Area:	0.18 hectares
Existing Use:	Public House
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	14
Other Uses Proposed:	None
Ward:	Harrow Weald
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	1b
Town Centre:	No

Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

Relevant Planning History

5.44 On 2nd February 2011 the Council granted planning permission for the demolition of the existing public house and redevelopment to provide a part two, part three storey building comprising 10 flats and 4 dwellinghouses, together with the provision of car parking and landscaping.

Commentary

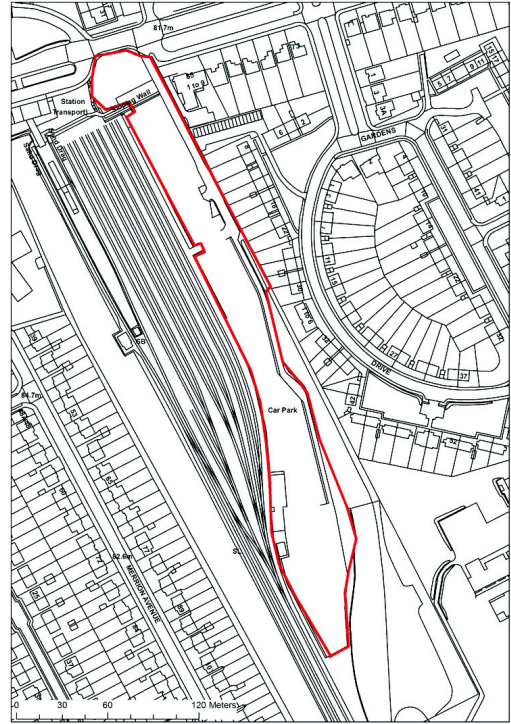
5.45 The site is suitable for residential development only.

Sites without Planning Permission

Site H18: Land at Stanmore Station, London Road, Stanmore



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Site Details

Site Area:	1.45 hectares
Existing Use:	Transport for London car park (Stanmore Station)
Housing Trajectory Status:	N/A
Number of Homes:	70
Other Uses Proposed:	Retention of adequate car parking provision
Ward:	Canons
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	3

Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	Adjacent to Site of Importance for Nature Conservation Importance (borough importance grade II)
Listed Building/Conservation Area:	Adjacent to Stanmore Station locally listed building and Kerry Avenue Conservation Area
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	London Road part of the London distributor road network

Relevant Planning History

5.46 No relevant planning history.

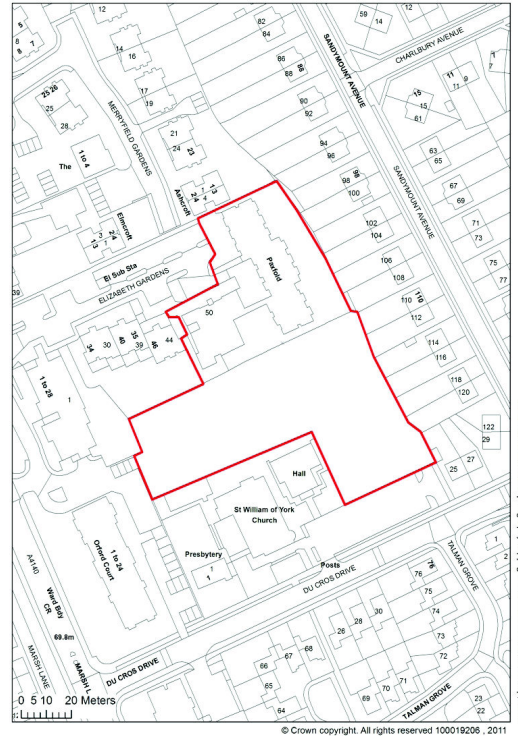
Commentary

5.47 The site forms part of UDP Proposal Site PS24 for residential or B1 use with the retention of the station use and adequate parking. The existing extent of the Proposal Site includes the airspace over the Jubilee line and land which is part of a Site of Importance for Nature Conservation. The Council has amended the boundaries of the Proposal Site to remove the allocation from the station and railway airspace, and to from the Nature Conservation site. This is because airspace development is considered unlikely to be feasible for the foreseeable future, and to ensure no conflict between the Proposal Site designation and biodiversity objectives.

5.48 The car park is a significant asset at this terminus station on the Jubilee line, and is particularly well used in connection with major events at Wembley stadium. The provision of some replacement car parking will therefore be an important objective for the development of this site. There is a significant fall in site levels from London Road, which bounds the site to the north, to the south of the site; the existing surface car park provides disabled persons' access to Stanmore Station. A further objective for the development of the site will therefore be the provision of improved alternative disabled persons' access, both from the principal station building on London Road and from the replacement car parking facility.

5.49 The site also has potential to contribute to the Borough's Green Grid by forming a footpath between Dalkeith Grove and London Road (as part of strategic green link between Canons Park Stanmore Country Park, providing public access to the adjacent Site of Importance for Nature Conservation). The setting of the adjoining Kerry Avenue Conservation Area and locally listed Stanmore Station should also be considered.

Site H19: Paxfold, Elizabeth Gardens, Stanmore



Site Details

Site Area:	0.813
Existing Use:	Sheltered Accommodation and Open Space
Housing Trajectory Status:	N/A
Number of Homes:	To be determined.
Other Uses Proposed:	Replacement sheltered housing scheme
Ward:	Canons
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	2
Town Centre:	No
Employment Land:	No

Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Designated Open Space
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

Relevant Planning History

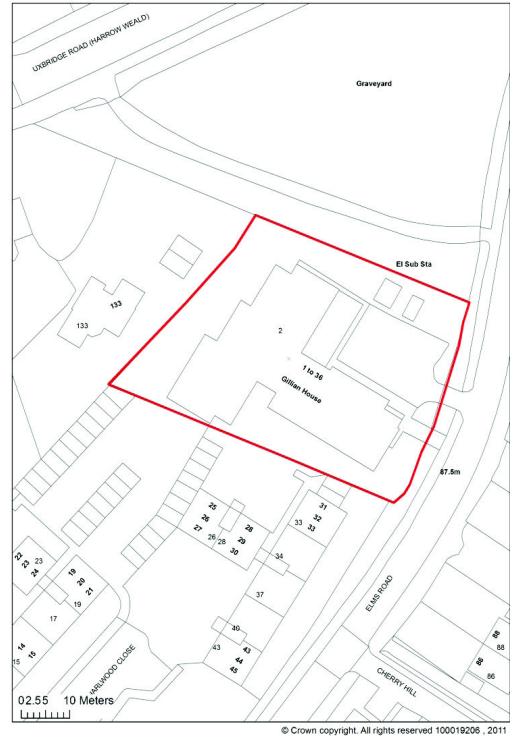
5.50 Not known

Commentary

5.51 The existing complex is a 1970/80s sheltered housing development. The site is suitable for redevelopment to provide replacement sheltered housing to modern standards of comfort and accessibility. The site boundary includes land designated as open space. In redeveloping the site, there should be no net loss of open space. However, subject to an assessment of the amenity value of trees on the open space (and any subsequent requirement for their retention), there may be potential re-provide the open space to enhance community access to this important local asset.

5.52 The Grade II Listed Building Church of St William of York adjoins the site on its south side and the impact upon this heritage asset of any development would need to be considered.

Site H20: Gillian House, Elms Road, Harrow Weald



Site Details

Site Area:	0.253
Existing Use:	Sheltered Accommodation
Housing Trajectory Status:	N/A
Number of Homes:	To be determined.
Other Uses Proposed:	Replacement sheltered housing scheme
Ward:	Harrow Weald
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	2
Town Centre:	No
Employment Land:	No

Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Adjacent to Open Space/Green Belt
SSSI/Site of Importance for Nature Conservation:	Adjacent to Site of Importance for Nature Conservation (borough importance grade II)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

Relevant Planning History

5.53 Not known

Commentary

5.54 The existing complex is a 1970/80s sheltered housing development. The site is suitable for redevelopment to provide replacement sheltered housing to modern standards of comfort and accessibility. The site adjoins part of Harrow Weald (old) cemetery which contains a number of mature trees which will need to be considered and protected as part of the design and layout of any redevelopment.

Site H21: Wolstenholme, Rectory Lane, Stanmore



Site Details

Site Area:	0.251
Existing Use:	Sheltered Accommodation
Housing Trajectory Status:	N/A
Number of Homes:	To be determined.
Other Uses Proposed:	Replacement sheltered housing scheme
Ward:	Stanmore Park
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	1a-1b
Town Centre:	No
Employment Land:	No

Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Adjacent open space (part of Stanmore Park)
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	Adjacent to Old Church Lane Conservation Area; boundary wall to east locally listed; opposite St. John the Evangelist (listed)
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	Adjacent to Old Church Lane archaeological priority area
Other:	None

Relevant Planning History

5.55 Not known

Commentary

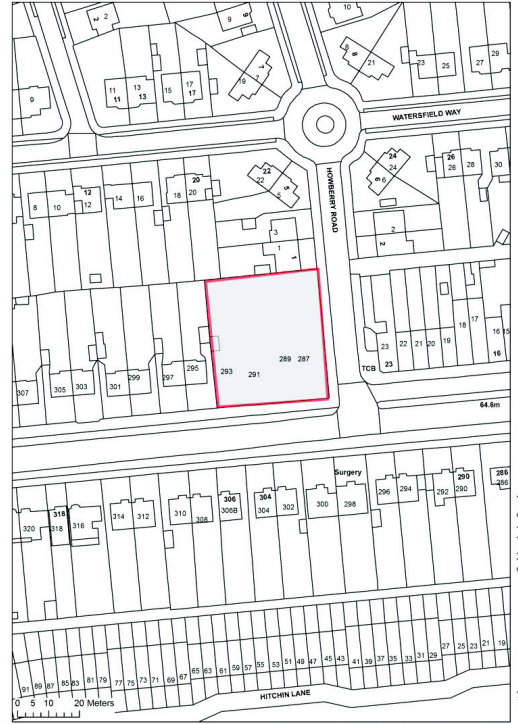
5.56 The existing complex comprises an late Victorian/Edwardian villa fronting Rectory Lane with a two storey, staggered 1970/80s complex to the rear forming sheltered accommodation. The site is suitable for redevelopment to provide replacement sheltered housing to modern standards of comfort and accessibility. However this is a long, narrow site and care will be needed to preserve and enhance the adjoining conservation area (which includes a number of mature trees at the boundary) and to safeguard the amenity of occupiers of property which face the site at the neighbouring Stanmore Park development.

5.57 The Grade II Listed Building Church of St John the Evangelist adjoins the site. Its setting as a heritage asset should be considered as part of any future development proposals on the site

Edgware and Burnt Oak Sub Area

Sites with Planning Permission

Site H21: 287-293 Whitchurch Lane, Canons Park



Site Details

Site Area:	0.016 hectares
Existing Use:	Vacant (formerly two pairs of semi-detached houses)
Housing Trajectory Status:	Schedule 1 (new build site with planning permission) (site 1730)
Number of Homes:	14
Other Uses Proposed:	Fitness/spa centre
Ward:	Canons
Core Strategy Sub Area:	Edgware and Burnt Oak

Planning Designations

Flood Zone:	Zone 1 (low probability)
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Public Transport Accessibility Level:	2-3
Town Centre:	No (Canons Park neighbourhood parade adjacent)
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Whitchurch Lane part of the Borough distributor road network

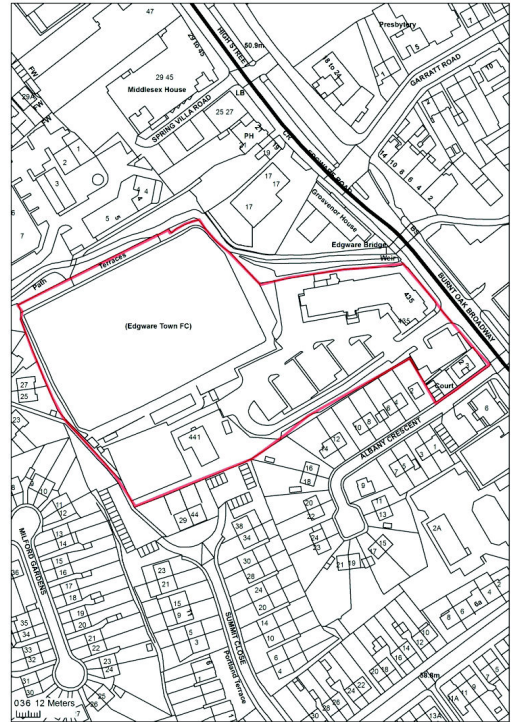
Relevant Planning History

5.58 Planning permission for redevelopment to provide a two storey block (with rooms in roof) to provide fourteen flats with parking and a fitness/spa centre was allowed, on appeal, on 2nd July 2007 (P/3309/06).

Commentary

5.59 The site is be suitable for predominantly residential development, but with the potential for small scale commercial use at ground floor to form an extension to the Canons Park neighbourhood parade.

Site H22: Edgware Town Football Club, Edgware



Site Details

Site Area:	1.22 hectares
Existing Use:	Former Edgware Town Football Club and associated car parking
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	189
Other Uses Proposed:	None
Ward:	Edgware
Core Strategy Sub Area:	Edgware and Burnt Oak

Planning Designations

Flood Zone:	Zone 2 and 3 (medium and high probability)
Public Transport Accessibility Level:	2-4

Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Open Space
SSSI/Site of Importance for Nature Conservation:	No (but part of an area of deficiency in access to nature conservation)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Edgware Road part of the London distributor road network

Relevant Planning History

5.60 On 22nd April 2010 outline planning permission was granted for the development of 189 dwellings.

Commentary

5.61 Thames Water have highlighted that there may be insufficient waste water capacity in this area. Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.

5.62 The site is within close proximity to one of National Grid's high voltage underground cables. Developers should contact the National Grid to ensure any issues arising from this can be resolved.

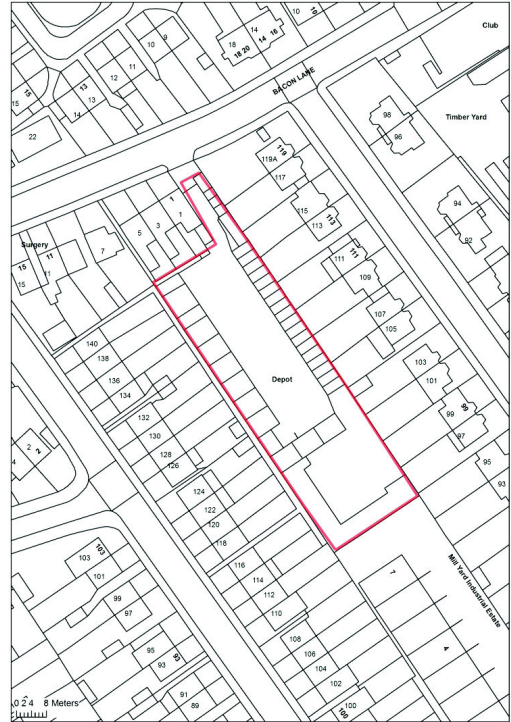
5.63 Any development should be sequentially located to areas of the site with lowest flood risk. More vulnerable uses should be located in the area of lowest risk.

Sites without Planning Permission

Site H23: Hills Yard and Lockup Garages, Bacon Lane



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Site Details

Site Area:	0.26 hectares
Existing Use:	Not known (believed to be lock up garages and B1/B2 industrial uses)
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	28
Other Uses Proposed:	None
Ward:	Edgware
Core Strategy Sub Area:	Edgware and Burnt Oak

Planning Designations

Flood Zone:	Zone 1 (low probability)
-------------	--------------------------

Public Transport Accessibility Level:	2-3
Town Centre:	No
Employment Land:	Non-designated
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No (but part of an area of deficiency in access to nature conservation)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

Relevant Planning History

5.64 None

Commentary

5.65 The site is suitable for residential use only.

Site H24: 19 Buckingham Road, Edgware



Site Details

Site Area:	0.128 hectares
Existing Use:	Not known
Housing Trajectory Status:	N/A
Number of Homes:	7
Other Uses Proposed:	None
Ward:	Edgware
Core Strategy Sub Area:	Edgware and Burnt Oak

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	3-4
Town Centre:	No
Employment Land:	No

Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

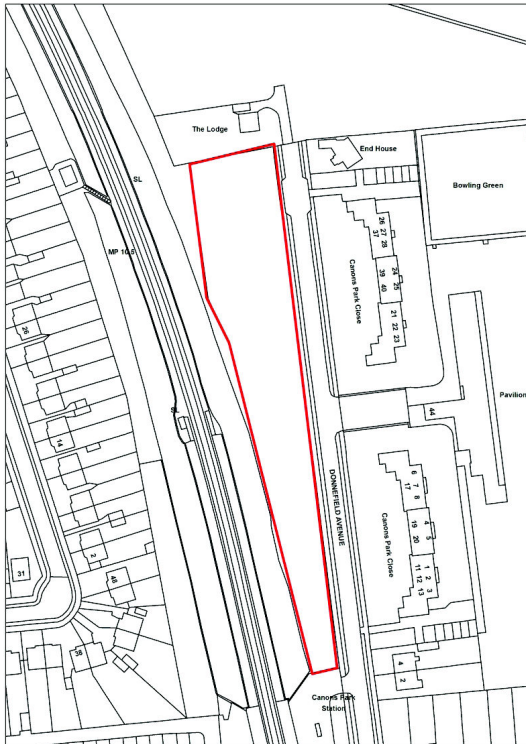
Relevant Planning History

5.66 None

Commentary

5.67 The site is suitable for residential development only.

Site H25: 19 Canons Park Station Car Park



Site Details

Site Area:	0.41 hectares
Existing Use:	Car Park
Housing Trajectory Status:	N/A
Number of Homes:	20 based on half the site only
Other Uses Proposed:	None
Ward:	Canons
Core Strategy Sub Area:	Edgware and Burnt Oak

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	3
Town Centre:	No
Employment Land:	No

Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	Adjacent to Canons Park Estate Conservation Area
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

Relevant Planning History

5.68 None

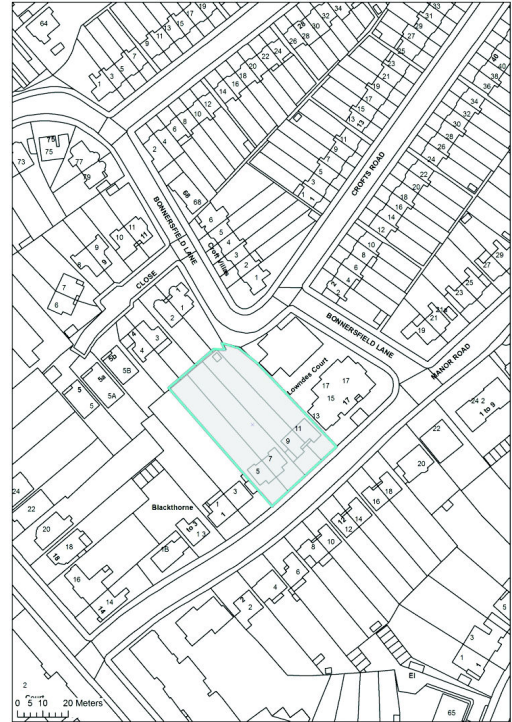
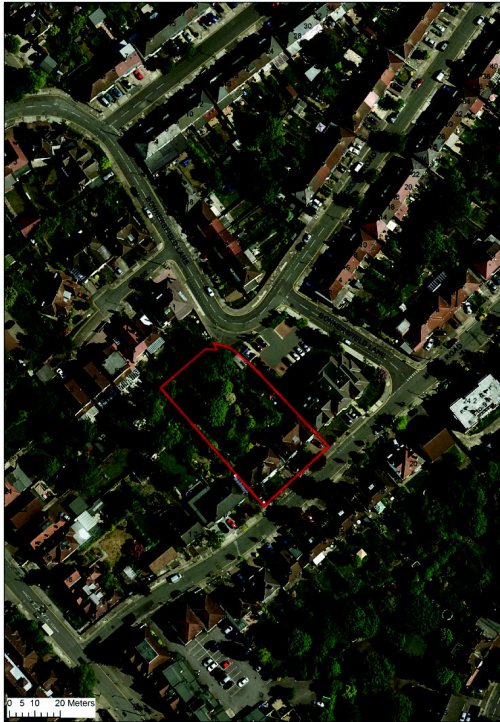
Commentary

5.69 The site is suitable for a residential led scheme with replacement parking for the station.

Harrow and Wealdstone Sub Area (excluding the Intensification Area)

Sites with Planning Permission

Site H26: 5-11 Manor Road, Harrow



Site Details

Site Area:	0.202 hectares
Existing Use:	Two pairs of semi-detached houses
Housing Trajectory Status:	Schedule 1 (new build site with planning permission) (site 1814)
Number of Homes:	14
Other Uses Proposed:	None
Ward:	Greenhill
Core Strategy Sub Area:	Harrow and Wealdstone (outside of Intensification Area)

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	1a-1b
Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

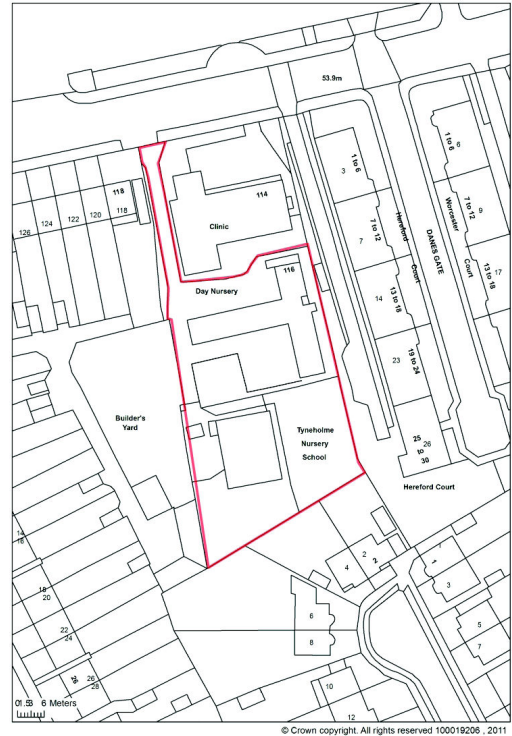
Relevant Planning History

5.70 Planning permission for the demolition of four houses and the construction of two houses and twelve flats with access, car parking and landscaping was allowed, on appeal, on 11th June 2008 (P/2604/07).

Commentary

5.71 The site is suitable only for residential development.

Site H27: Former Tyneholme Nursery, Headstone Drive



Site Details

Site Area:	0.22 hectares
Existing Use:	Children's nursery
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	15
Other Uses Proposed:	None
Ward:	Marlborough
Core Strategy Sub Area:	Harrow and Wealdstone (outside of Intensification Area)

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	3
Town Centre:	No

Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No (but part of an area of deficiency in access to nature conservation)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Headstone Drive part of the Borough distributor road network

Relevant Planning History

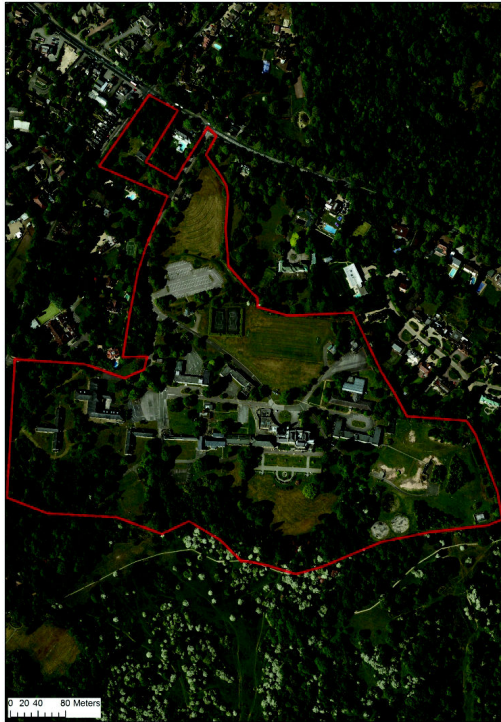
5.72 On 19th January 2011 the Council granted planning permission for the demolition of the existing day care and nursery buildings and the erection of a 41 bed care home for the elderly, together with associated car parking and landscaping improvements (P/2437/10).

Commentary

5.73 The site is suitable for residential use only.

6 Major Developed Sites In Green Belt

Site GB1: RAF Bentley Priory, Stanmore



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Site Details

Site Area:	5.6 hectares
Existing Use:	Vacant (formerly RAF Bentley Priory)
Housing Trajectory Status:	Schedule 5 (sites where the principle of residential development has been accepted as at 31st March 2010)
Number of Homes:	103
Other Uses Proposed:	Museum
Ward:	Stanmore Park
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
-------------	--------------------------

Public Transport Accessibility Level:	1a-1b
Town Centre:	No
Employment Land:	No
Area of Special Character:	Harrow Weald Ridge Area of Special Character
Green Belt/Metropolitan Open Land/Open Space:	Green Belt
SSSI/Site of Importance for Nature Conservation:	Adjacent to SSSI, Site of Importance for Nature Conservation Importance (metropolitan importance) and Local Nature Reserve
Listed Building/Conservation Area:	Bentley Priory Grade II* Listed
Historic Park and Garden:	Part of Bentley Priory Grade II Historic Park and Garden
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	The Common part of the London distributor road network A number of TPOs protect trees of amenity importance within the site

Relevant Planning History

6.1 In September 2007 the Council adopted a supplementary planning document to guide the future use and redevelopment of the former RAF Bentley Priory site.

6.2 On 23rd July 2008 the Council resolved to grant planning permission, subject to statutory referrals and completion of a section 106 Planning Obligation, for the change of use of Bentley Priory to provide a museum/educational facility, associated listed building alterations, and the development of 103 dwellinghouses in the grounds with parking and access, landscaping, open space provision, ancillary staff accommodation and an energy centre (P/1452/08). On 13th September 2010 the Council formally granted planning permission for the development.

Commentary

6.3 Thames Water have highlighted that there may not be sufficient waste water capacity in this area. Therefore, developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.

Site GB2: Royal National Orthopaedic Hospital



Site Details

Site Area:	0.53 hectares
Existing Use:	Hospital and open land
Housing Trajectory Status:	Schedule 6 (potential deliverable site as at 31st March 2010)
Number of Homes:	127
Other Uses Proposed:	None
Ward:	Canons
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	1a-1b
Town Centre:	No

Employment Land:	No
Area of Special Character:	Harrow Weald Ridge Area of Special Character
Green Belt/Metropolitan Open Land/Open Space:	Green Belt
SSSI/Site of Importance for Nature Conservation:	Sites of Importance for Nature Conservation (Metropolitan and Borough Importance grade I)
Listed Building/Conservation Area:	Adjacent to Little Common Conservation Area and Brockley Hill Farm House (grade II listed)
Historic Park and Garden:	No
Scheduled Ancient Monument:	Site AM5: Obelisk Site AM6: Romano-British pottery and settlement of Svlloniaca
Archaeological Priority Area:	No
Other:	Brockley Hill part of the London distributor road network

Relevant Planning History

6.4 On 15th January 2007 outline planning permission was granted for the partial redevelopment of the site to provide a new hospital and associated facilities, housing, a revised road junction, car parking and open space (P/1704/05). Outline planning permission P/1220/07 was renewed in March 2010 and the PFI scheme for the re-development of the hospital is set to proceed.

Commentary

6.5 The site is within the Green Belt and the Harrow Weald Ridge Area of Special Character, and is sensitive in relation to nearby heritage and nature conservation designations and so careful consideration of the archaeological interest on this site, as well as the setting of the adjoining listed building and conservation area must be demonstrated. The approved scheme has demonstrated that the redevelopment of this major development site in the Green Belt can be achieved to support the renewal of this important national health facility. The phased proposals will continue to meet policy objectives for the redevelopment of this major developed site in the Green Belt and be acceptable in all other respects.

6.6 Thames Water have highlighted that there may be issues with the capacity of waste water infrastructure in this area. Therefore developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.

Employment Land:	No
Area of Special Character:	Yes
Green Belt/Metropolitan Open Land/Open Space:	Yes
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	Locally Listed (Proposed)
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	

Relevant Planning History

6.7 Potential for housing and extension to cemetery to the north.

Site GB4 Wood Farm, Stanmore



Site Details

Site Area:	25
Existing Use:	Farm and Open Space
Housing Trajectory Status:	Consented
Number of Homes:	10
Other Uses Proposed:	Nature Reserve
Ward:	Stanmore
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
PTAL	1a/1b
Town Centre:	No
Employment Land:	No

Area of Special Character:	Yes
Green Belt/Metropolitan Open Land/Open Space:	Green Belt
SSSI/Site of Importance for Nature Conservation:	Site of Importance for Nature Conservation (Part Borough grade 2 and Part Metropolitan importance)
Listed Building/Conservation Area:	Yes - Part Little Common Conseration Area, Stanmore
Historic Park and Garden:	No
Scheduled Ancient Monument:	Yes - Grims Dyke Ditch
Archaeological Priority Area:	No
Other:	No

Commentary

6.8 This site is to become an extension of Stanmore Country park, as a nature reserve. A small number of housing units have been granted permission to enable the rest of the site to become part of the Country Park.

7 Open Spaces

Issues

7.1 Around a third of Harrow's total area is open space. This includes Green Belt, which is located mostly to the North of the Borough and Metropolitan Open Lane, which is located at Harrow on the Hill and four other sites across the Borough. The rest of Harrow's parks, public gardens, allotments and other green areas are classified as open space. Together these areas form an important part of Harrow's character, not only for residential amenity and recreational purposes, but also for their Biodiversity value, and role in reducing flood risk and climate change.

7.2 With regard to Harrow's Core Strategy, the Council intends to retain and enhance the open space in the Borough, and so there are no allocations to remove any Green Belt, Metropolitan Open Land or other Open Space designation. However, as a result of a recent Open Spaces, Sports and Recreation (PPG17) study (2010), and officer observations, we have included a number of minor changes to some open space boundaries which are outlined in the text accompanying the images of these areas below. There are also a number of additional open spaces that we have designated as such, that were identified through the study. The majority of these are small open spaces, which have been classed as 'Amenity Greenspace' in the PPG17 study (available at www.harrow.gov.uk/ldf). Amenity greenspace are areas that often encompass large verges, corner greens, and other open space that may not necessarily have a recreational value, but nonetheless, play a role in enhancing biodiversity, and can add to the leafy character of an area. Similarly, whilst many of these areas are small, combined they form a considerable area, and can help to reduce the risk of surface water flooding through natural drainage, and also help in absorbing carbon dioxide. For these reasons, we have allocated them to ensure that they remain as open space. It again should be noted that no new or amended open space has been allocated in the Intensification Area, as this is dealt with through the Area Action Plan.

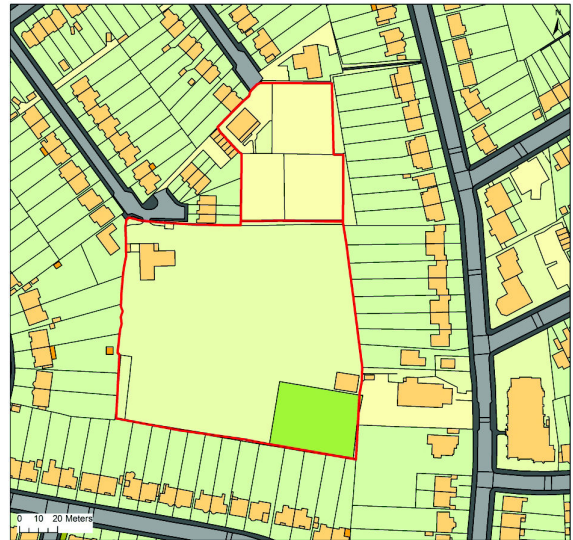
7.3 The first five open space designations concern existing, large parks and woodland, as explained in the text accompanying the images. These changes include extending existing open spaces, and some minor boundary changes.

Major Open Space Sites

Site MOS1: St. George's Playing Field, Pinner View, Harrow



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Site Details

Site Area:	1.8 Hectares
Existing Use:	Private Playing Field
Status:	N/A
Proposed Allocation:	Open Space
Ward:	Headstone South
Core Strategy Sub Area:	Rayners Lane and North Harrow

Planning Designations

Flood Zone:	Zone 1 (low probability)
Town Centre:	No
Employment Land:	No

Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Open Space (part)
SSSI/Site of Importance for Nature Conservation:	No (but part of an area of deficiency in access to nature conservation)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

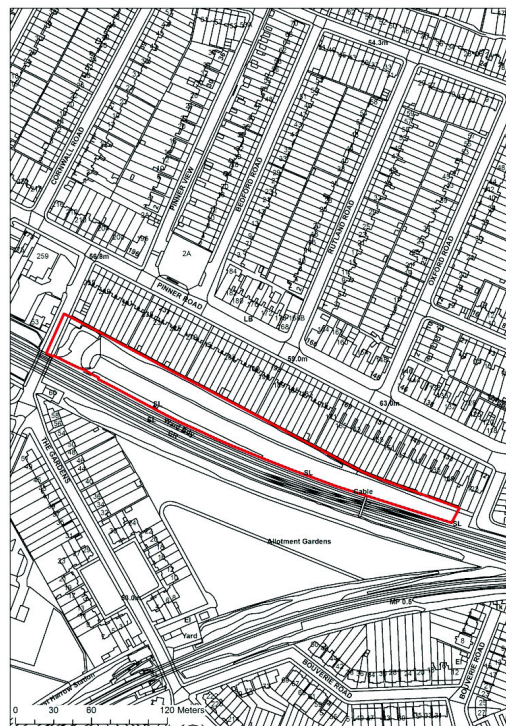
Commentary

7.4 The St. George's site forms part of a single playing field enveloped by existing suburban housing and gardens. Although most of the site was designated as open space on the 1994 UDP proposals map, carried forward onto the 2004 UDP proposals map, part of the site was erroneously omitted. This allocation extends the extent of this designated open space to reflect the full extent of the playing field. Recognition should be given to the adjoining St George's Hall and Church (both grade II listed buildings) and importance of the open space in providing a setting to these assets.

Site MOS2: Land rear of 121-255 (odds) Pinner Road, West Harrow



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Site Allocations Pre-Submission DPD

Site Details

Site Area:	0.9 hectares
Existing Use:	Woodland/wasteland
Status:	UDP Proposal Site 39
Proposed Allocation:	Nature Reserve
Ward:	Headstone South
Core Strategy Sub Area:	Rayners Lane and North Harrow

Planning Designations

Flood Zone:	Zone 1 (low probability)
Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No
SSSI/Site of Importance for Nature Conservation:	No (but part of an area of deficiency in access to nature conservation)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Pinner part of the London distributor road network

Commentary

7.5 The site is identified as a potential new Nature Reserve.

Site MOS3: Harrow Weald Park, Brookshill, Harrow Weald



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Site Details

Site Area:	6.9 hectares
Existing Use:	Woodland
Status:	UDP Proposal Site 15
Proposed Allocation:	Public open space
Ward:	Harrow Weald
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
Town Centre:	No
Employment Land:	No

Site Allocations Pre-Submission DPD

Area of Special Character:	Harrow Weald Ridge Area of Special Character
Green Belt/Metropolitan Open Land/Open Space:	Green Belt
SSSI/Site of Importance for Nature Conservation:	Site of Importance for Nature Conservation (Borough Importance grade II)
Listed Building/Conservation Area:	Part of Conservation Area
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Brookshill part of the London distributor road network

Commentary

7.6 The site is identified as a potential new publicly accessible site of natural or semi-natural greenspace. This park is located in West Drive conservation Area and is an integral part of the areas designation as a heritage assets.

Site MOS4: Glenthorne, Common Road, Stanmore



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Site Details

Site Area:	3.3 hectares
Existing Use:	Woodland
Status:	UDP Proposal Site 23
Proposed Allocation:	Public open space
Ward:	Stanmore Park
Core Strategy Sub Area:	Stanmore and Harrow Weald

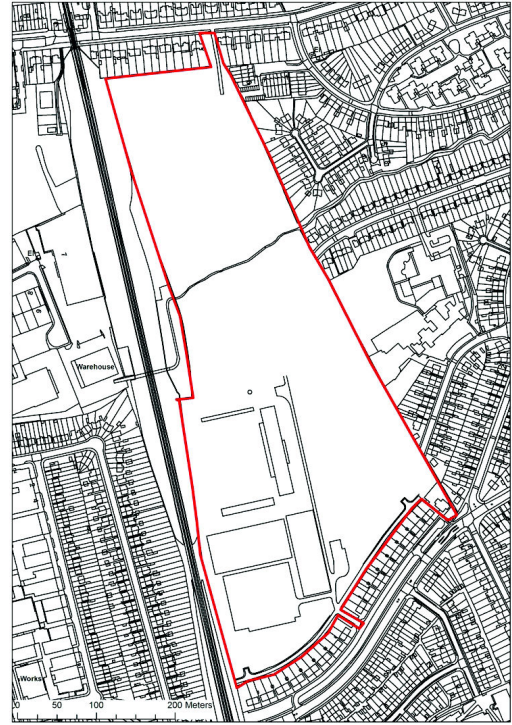
Planning Designations

Flood Zone:	Zone 1 (low probability)
Town Centre:	No
Employment Land:	No
Area of Special Character:	Harrow Weald Ridge Area of Special Character
Green Belt/Metropolitan Open Land/Open Space:	Green Belt
SSSI/Site of Importance for Nature Conservation:	Site of Importance for Nature Conservation (Metropolitan Importance) Adjacent to Bentley Priory Site of Special Scientific Interest
Listed Building/Conservation Area:	Adjacent to Grade 2 listed Bentley Priory
Historic Park and Garden:	Bentley Priory Historic Park and Garden
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Common Road part of the London distributor road network

Commentary

7.7 The site is identified as a potential extension to Bentley Priory Open Space has an historic interest as part of Bentley Priory and so should be carefully managed to reflect this.

Site MOS5: Prince Edward Playing Fields, Whitchurch Lane/Camrose Avenue, Edgware



Site Details

Site Area:	17.3 hectares
Existing Use:	The Hive Football Academy
Status:	UDP Proposal Site 12
Proposed Allocation:	Community outdoor sports use
Ward:	Queensbury
Core Strategy Sub Area:	Kingsbury and Queensbury

Planning Designations

Flood Zone:	Zones 2 and 3 (medium and high probability)
Town Centre:	No
Employment Land:	No

Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Open Space
SSSI/Site of Importance for Nature Conservation:	Adjacent to Site of Importance for Nature Conservation (Borough Importance grade II)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Whitchurch Lane and Camrose Avenue part of the Borough distributor road network

Commentary

7.8 The site is designated open space and is undergoing redevelopment as part of the new Hive Football Academy (with community access). Further phases of this redevelopment are to follow.

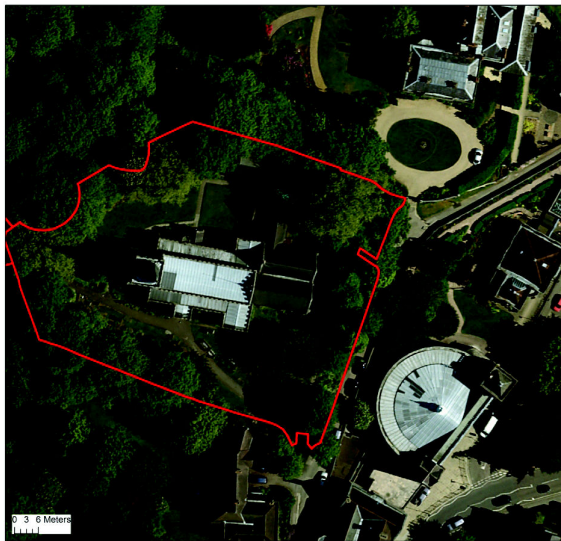
7.9 Further redevelopment will be restricted to the minimum necessary to support sports use and community access and must not prejudice or adversely affect the role of this site as a flood storage area

Minor Open Space Designations

7.10 The remained of our open space designations are focused on minor changes to existing open space boundaries, and new open space (primarily small amenity greenspace), as identified through Harrow's PPG17 Open Space, Sport and Recreation study (2010), and officer observations. The text accompanying each image explains which PPG 17 classification they fall under and the reason for inclusion. However, irregardless of typology, all the spaces are designated as open space, and illustrated as such on the proposals map.

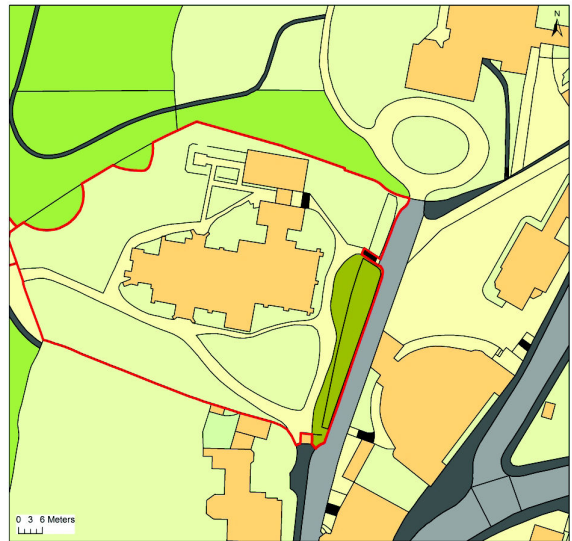
Site OS01: St. Mary's Church Yard, Harrow-on-the-Hill

Picture 7.1



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Picture 7.2

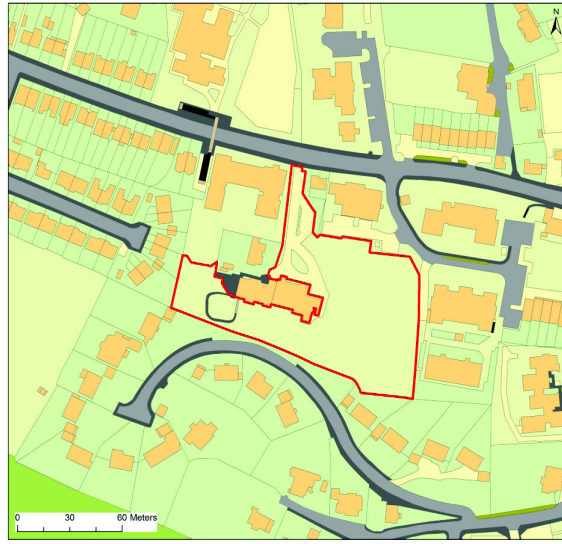


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7.11 Included as an extension to Metropolitan Open Land following the PPG 17 Study (churchyards and cemeteries typology).

Site OS02: Christchurch, Roxeth Hill, Harrow-on-the-Hill

Picture 7.4

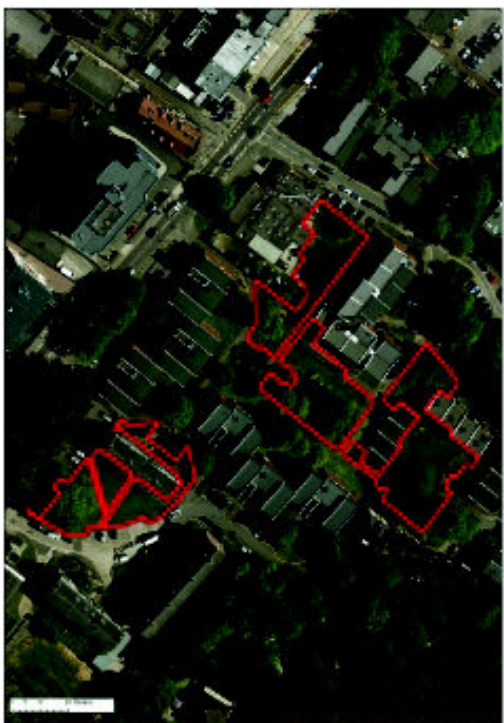


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7.12 Included as open space following the PPG 17 Study (churchyards and cemeteries typology).

Site OS03: Grange Road, Hornbuckle Close and Cowen Avenue, South Harrow

Picture 7.5



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Picture 7.6



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7.13 Included as open space following the PPG 17 Study (amenity green space).

Site OS04: Welbeck Road, West Harrow

Picture 7.7



7.14 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS05: Grange Farm Estate, South Harrow

Picture 7.8



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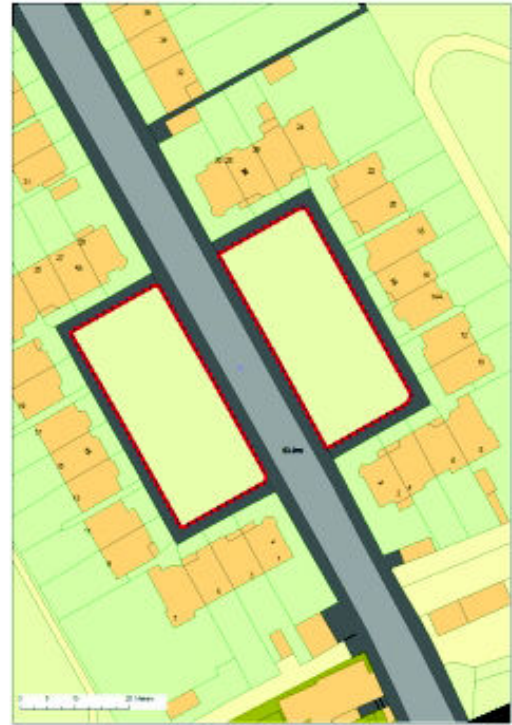
7.15 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS06: The Gardens, West Harrow

Picture 7.10



Picture 7.11



7.16 Included as open space following the PPG 17 Study (amenity greenspace typology).

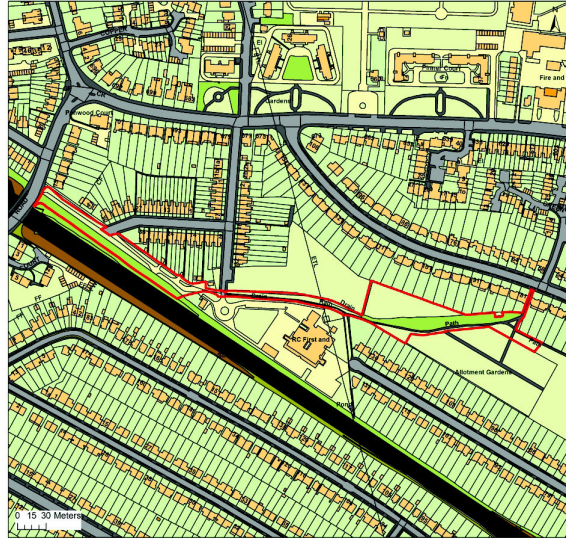
Site OS07: Woodlands Green Corridor, North Harrow

Picture 7.12



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Picture 7.13



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7.17 Amended boundaries of open space following the PPG 17 Study (green corridor typology).

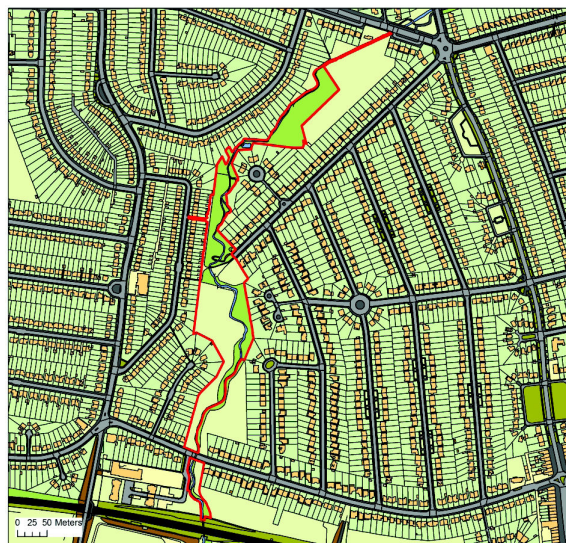
Site OS08: Streamside Open Space, Rayners Lane

Picture 7.14



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Picture 7.15



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7.18 Amended boundaries of open space following the PPG 17 Study (green corridor typology).

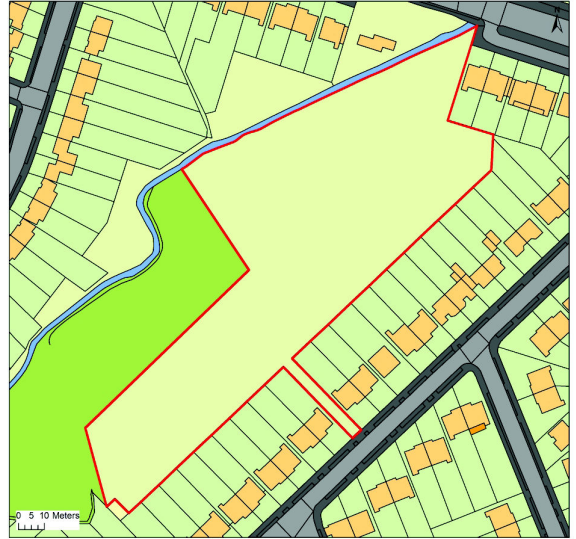
Site OS09: Streamside Open Space, Rayners Lane

Picture 7.16



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Picture 7.17



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7.19 Amended boundaries of open space following the PPG 17 Study (allotments typology).

Site OS10: Woodlands Open Space, North Harrow

Picture 7.18



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Picture 7.19



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7.20 Amended boundaries of open space following the PPG 17 Study (amenity greenspace typology).

Site OS11: Exchange Walk, Rayners Lane

Picture 7.20



Picture 7.21



7.21 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS12: Honeybun Estate, The Springway and Lascelles Avenue, Harrow

Picture 7.22



Picture 7.23



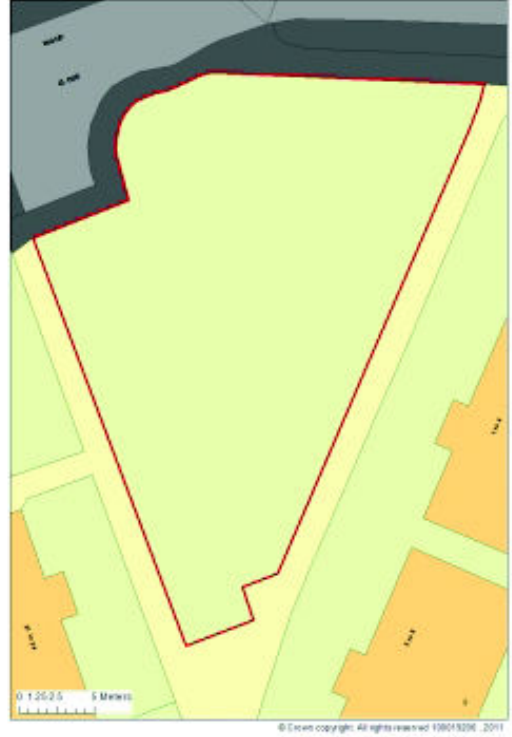
7.22 Amended boundaries of open space following the PPG 17 Study (amenity greenspace typology).

Site OS13: Honeybun Estate, Wood Close, Harrow

Picture 7.24



Picture 7.25



7.23 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS14: Amenity Space at Jubilee Close, Pinner

Picture 7.26



Picture 7.27



7.24 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS15: Miller Close, Pinner Green

Picture 7.28



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Picture 7.29



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7.25 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS16: Verges, Waxwell Lane and Uxbridge Road, Pinner

Picture 7.30



Picture 7.31



7.26 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS17: Amenity Space at Dove Park, Hatch End

Picture 7.32



Picture 7.33



7.27 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS18: Land Rear of 41/41A Sylvia Avenue, Hatch End

Picture 7.34



Picture 7.35



7.28 Included as open space following the PPG 17 Study (green corridor typology).

Site OS19: Woodridings Stream and Verge, Uxbridge Road and Woodhall Avenue, Hatch End

Picture 7.36



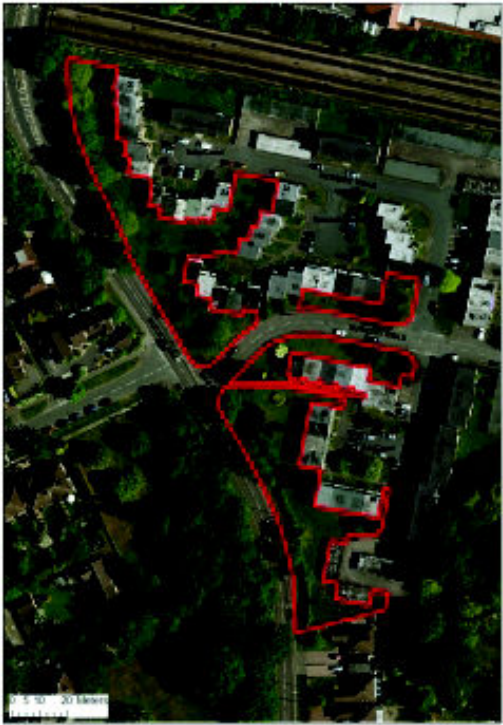
Picture 7.37



7.29 Included as open space following the PPG 17 Study (green corridor typology).

Site OS20: Amenity Space at Nursery Road, Pinner Green

Picture 7.38



Picture 7.39



7.30 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS21: River Pinn Open Space, Bridge Street, Pinner

Picture 7.40



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Picture 7.41



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7.31 Included as open space following the PPG 17 Study (parks and gardens typology).

Site OS22: Church Farm Open Space, High Street, Pinner

Picture 7.42



Picture 7.43



7.32 Included as open space following the PPG 17 Study (amenity greenspace typology).

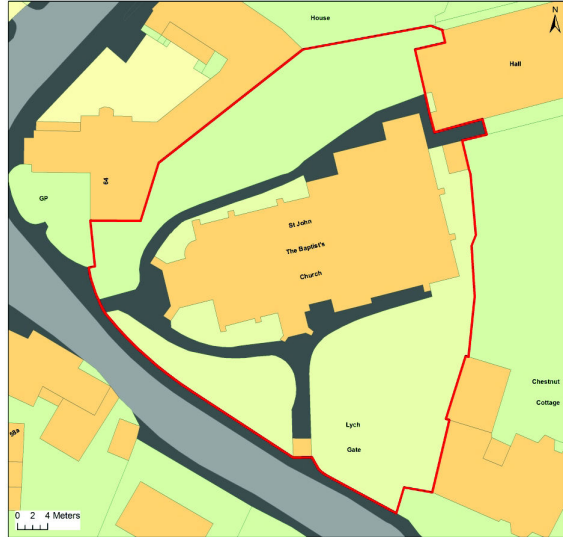
Site OS23: St. John the Baptist's Church Yard, High Street, Pinner

Picture 7.44



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7.33 Included as open space following the PPG 17 Study (churchyards and cemeteries typology).

Site OS24: Land fronting Pinner House, Church Lane, Pinner

Picture 7.46



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Picture 7.47



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7.34 Included as open space following the PPG 17 Study (amenity green space).

Site OS25: Tookes Green, Nower Hill, Pinner

Picture 7.48



Picture 7.49



7.35 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS26: Amenity Space at Pinner Grove and Grove Avenue, Pinner

Picture 7.50



Picture 7.51



7.36 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS27: Land Rear of 51-55 Cuckoo Hill Road, Pinner

Picture 7.52



Picture 7.53



7.37 Amended boundaries of open space following the PPG 17 Study (natural and semi-natural greenspace typology).

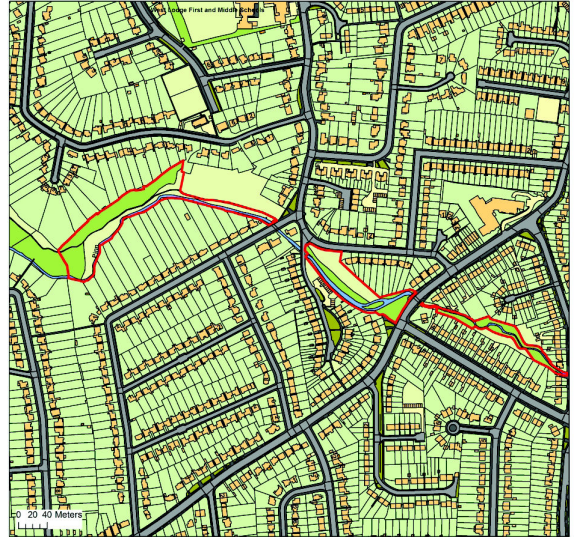
Site OS28: Celandine Way (Cannon Lane, Eastcote Road, Lloyd Court, Cranbourne Drive), Pinner

Picture 7.54



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7.38 Amended boundaries of open space following the PPG 17 Study (green corridor typology).

Site OS29: Celandine Way Extension (Cannon Lane, Eastcote Road), Pinner

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7.39 Included as open space following the PPG 17 Study (green corridor typology).

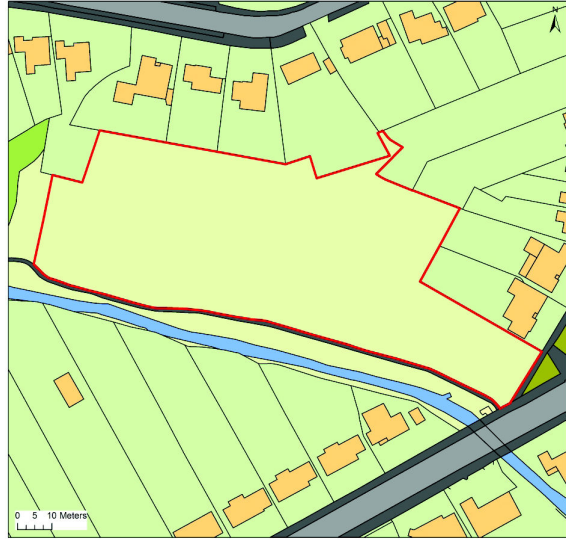
Site OS30: Cuckoo Hill, Pinner

Picture 7.58



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Picture 7.59



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7.40 Amended boundaries of open space following the PPG 17 Study (allotments typology).

Site OS31: Courtenay Avenue Verges, Harrow Weald

Picture 7.60



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Picture 7.61



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7.41 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS32: Land at Carmelite Way and Augustine Road, Harrow Weald

Picture 7.62



Picture 7.63



7.42 Included as open space following the PPG 17 Study (green corridor typology).

Site OS33: Boniface Walk Verges, Harrow Weald

Picture 7.64



Picture 7.65



7.43 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS34: Mepham Gardens and Mepham Crescent, Harrow Weald

Picture 7.66



Picture 7.67



7.44 Amended boundaries of open space following the PPG 17 Study (amenity greenspace typology).

Site OS35: Whittlesea Road, Harrow Weald

Picture 7.68



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Picture 7.69



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7.45 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS36: Boxtree Lane and Stafford Road, Harrow Weald

Picture 7.70



Picture 7.71



7.46 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS37: Langton Road, Harrow Weald

Picture 7.72



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7.47 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS38: Uxbridge Road Island and Verges (nr. Cullington Square), Harrow Weald

Picture 7.74



Picture 7.75



7.48 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS39: Carmelite Road and Bancroft Road, Harrow Weald

Picture 7.76



Picture 7.77



7.49 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS40: Carmelite Close, Harrow Weald

Picture 7.78



Picture 7.79



7.50 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS41: Kelvin Crescent, Harrow Weald

Picture 7.80



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Picture 7.81



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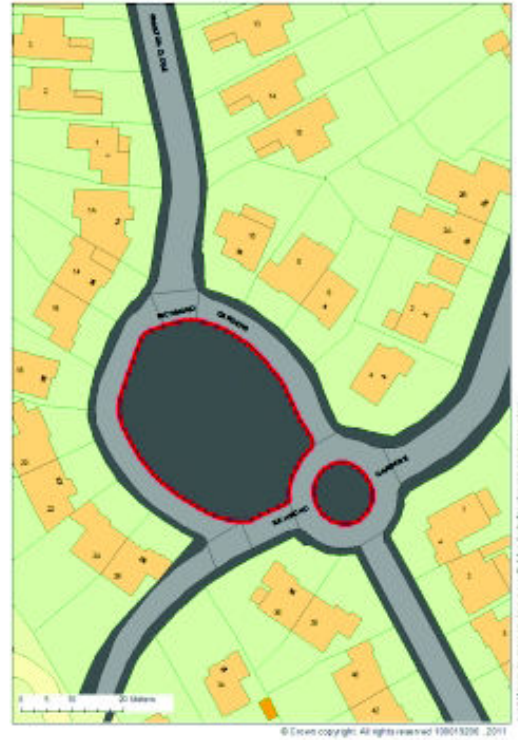
7.51 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS42: Winston Close and Richmond Gardens

Picture 7.82



Picture 7.83



7.52 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS43: Kenmore Avenue and Daintry Close, Wealdstone

Picture 7.84



Picture 7.85



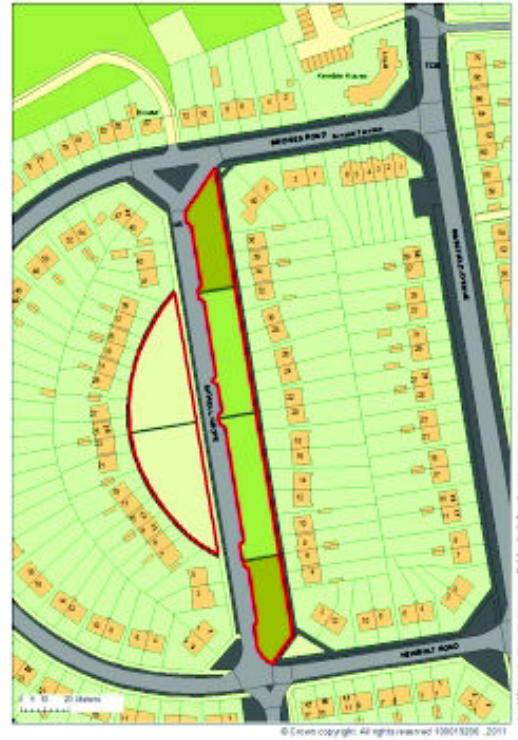
7.53 Amended boundaries of open space following the PPG 17 Study (amenity greenspace typology).

Site OS44: Sitwell Grove, Stanmore

Picture 7.86



Picture 7.87



7.54 Amended boundaries of open space following the PPG 17 Study (amenity greenspace typology).

Site OS45: North Verges, London Road, Stanmore

Picture 7.88



Picture 7.89



7.55 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS46: South Verges, London Road, Stanmore

Picture 7.90



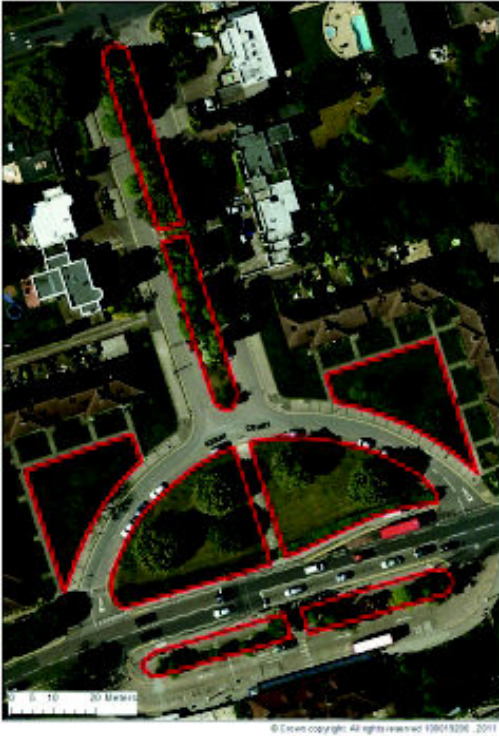
Picture 7.91



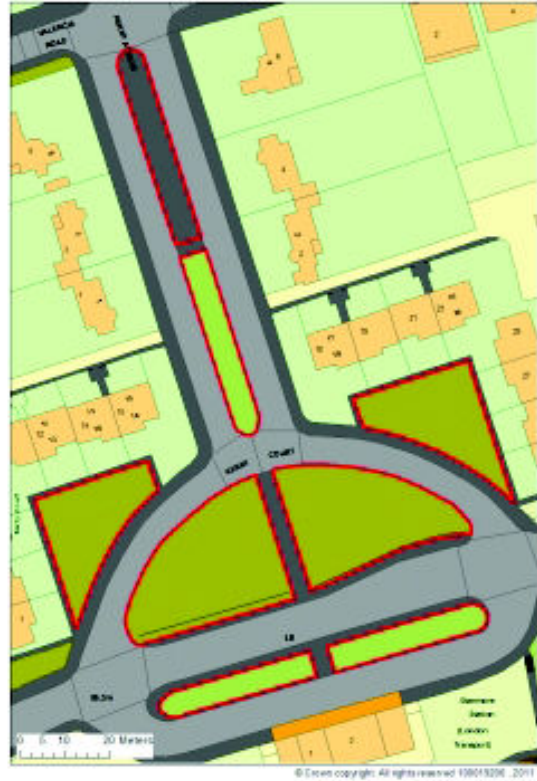
7.56 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS47: Kerry Court, Kerry Avenue and Stanmore Station, London Road, Stanmore

Picture 7.92



Picture 7.93



7.57 Amended boundaries of open space following the PPG 17 Study (amenity greenspace typology).

Site OS48: Rusper Close, London Road, Stanmore

Picture 7.94



Picture 7.95



7.58 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS49: Dingle Court, London Road, Stanmore

Picture 7.96



Picture 7.97



7.59 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS50: Westbere Drive and Morecambe Gardens, Stanmore

Picture 7.98



Picture 7.99



7.60 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS51: Tintagel Drive, Stanmore

Picture 7.100



Picture 7.101



7.61 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS52: Marsh Lane Verges, Stanmore

Picture 7.102



Picture 7.103



7.62 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS53: Amenity Space, Dene Gardens, Stanmore

Picture 7.104



Picture 7.105



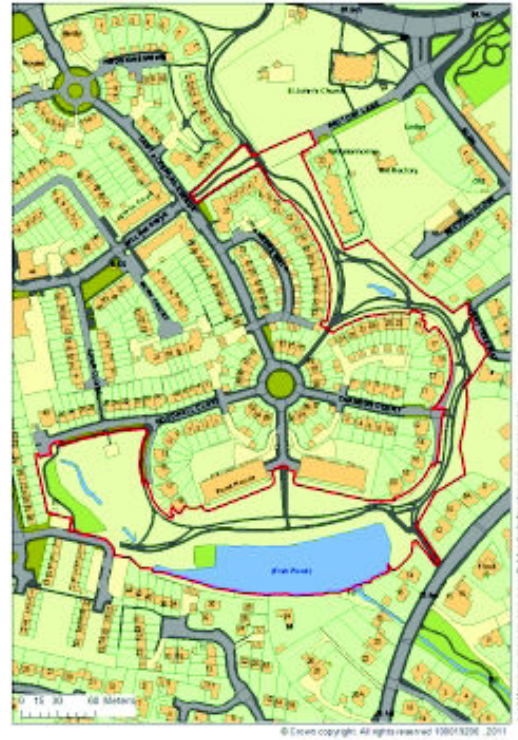
7.63 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS54: Lady Aylesford Drive, Stanmore

Picture 7.106



Picture 7.107



7.64 Amended boundaries of open space following the PPG 17 Study (amenity greenspace typology).

Site OS55: Vernon Drive, Stanmore

Picture 7.108



Picture 7.109



7.65 Amended boundaries of open space following the PPG 17 Study (amenity greenspace typology).

Site OS56: Bromefield Circle, Stanmore

Picture 7.110



Picture 7.111



7.66 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS57: Peter's Close, Stanmore

Picture 7.112



Picture 7.113



7.67 Included as open space following the PPG 17 Study (amenity greenspace typology).

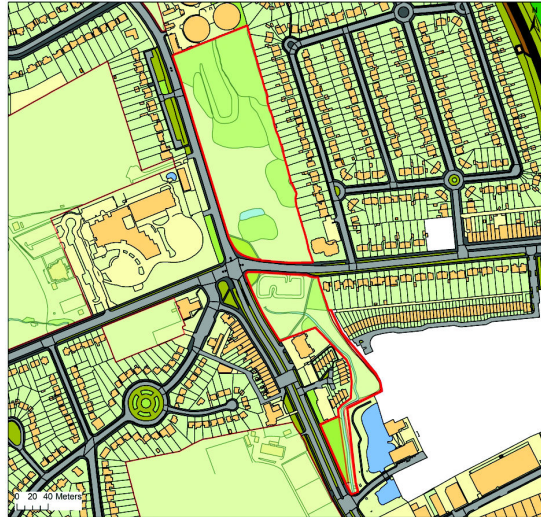
Site OS58: Stanmore Marsh, Honeypot Lane, Stanmore

Picture 7.114



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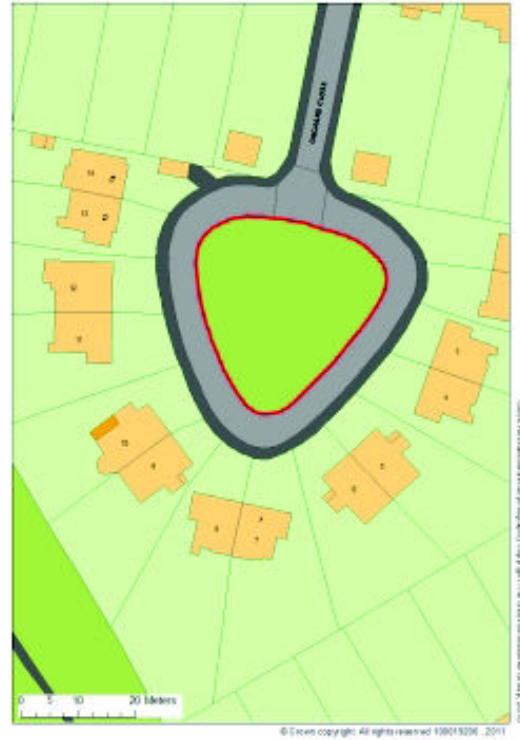
7.68 Amended boundaries of open space following the PPG 17 Study (natural and semi-natural typology).

Site OS59: Orchard Close, Edgware

Picture 7.116



Picture 7.117



7.69 Included as open space following the PPG 17 Study (amenity greenspace typology).

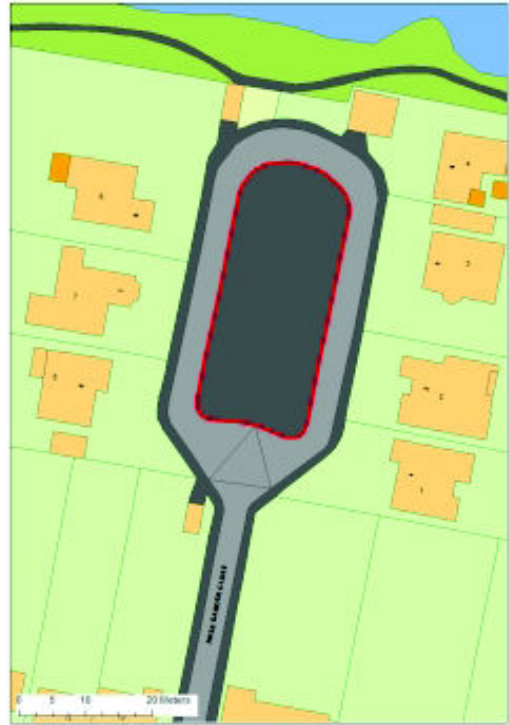
Site OS60: Rose Garden Close, Edgware

Picture 7.118



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7.70 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS61: Canons Drive Verge, Edgware

Picture 7.120



Picture 7.121



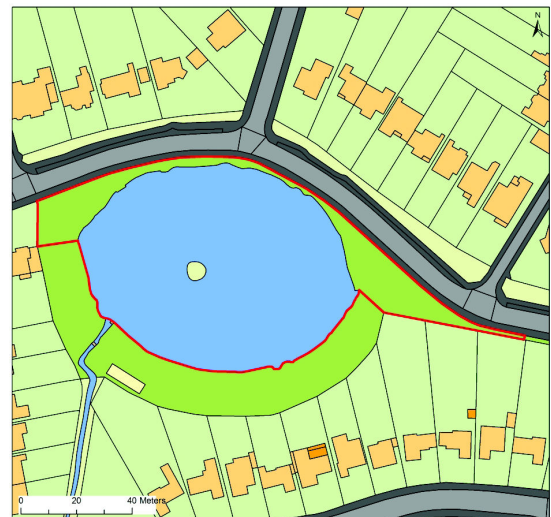
7.71 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS62: The Basin, Canons Drive, Edgware

Picture 7.122



Picture 7.123



7.72 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS63: Berridge Estate, Buckingham Road and Whitchurch Avenue, Edgware

Picture 7.124



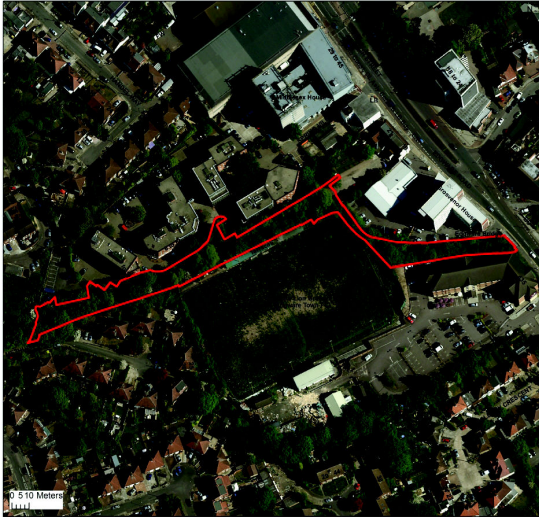
Picture 7.125



7.73 Included as open space following the PPG 17 Study (amenity greenspace typology).

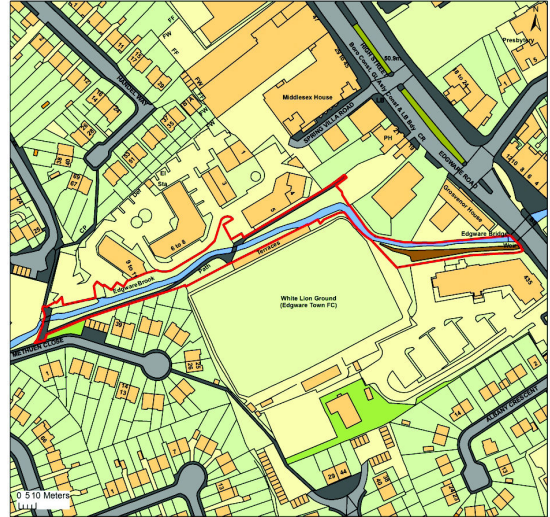
Site OS64: Edgware Brook, Methuen Close to Edgware Road

Picture 7.126



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7.74 Included as open space following the PPG 17 Study (green corridor typology).

Site OS65: Streatfield Road Roundabout, Queensbury

Picture 7.128



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Picture 7.129



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7.75 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS66: Queensbury Recreation Ground, Honeypot Lane, Kingsbury

Picture 7.130



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Picture 7.131



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7.76 Amended boundaries of open space following the PPG 17 Study (parks and gardens typology).

Site OS67: St Mary the Virgin, St. Leonard's Avenue, Kenton

Picture 7.132



Picture 7.133



7.77 Amended boundaries of open space following the PPG 17 Study (amenity greenspace typology).

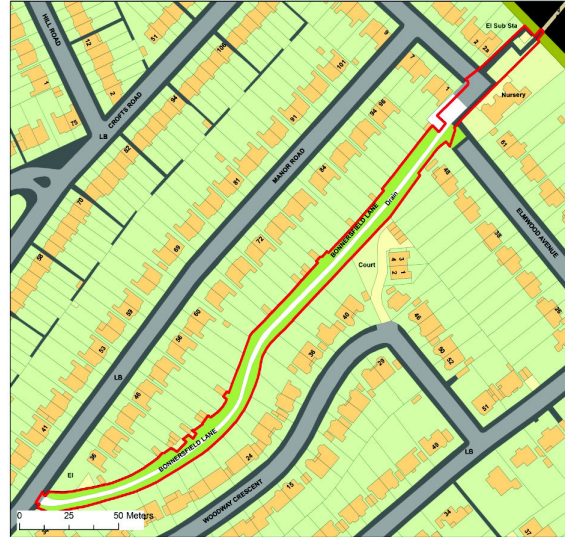
Site OS68: Bonnersfield Lane, Harrow

Picture 7.134



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Picture 7.135



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7.78 Amended boundaries of open space following the PPG 17 Study (green corridor typology).

Site OS69: Kenton Lane Allotments, Belmont

Picture 7.136



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Picture 7.137

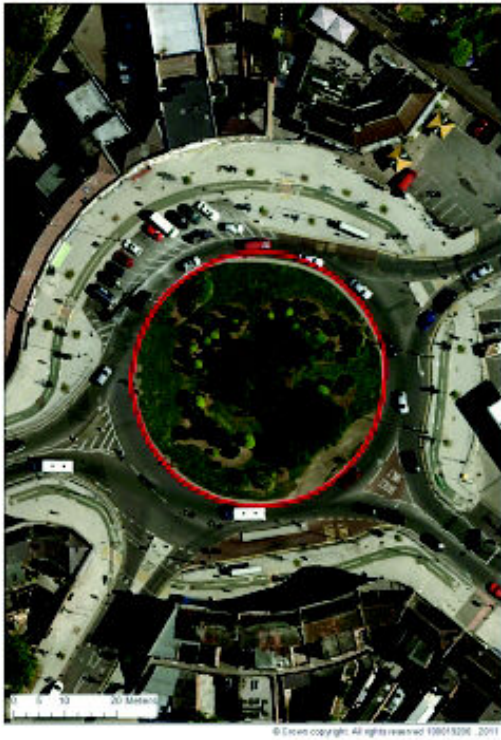


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7.79 Amended boundaries of open space to accurately represent the full extent of open land at the site.

Site OS 70: Belmont Circle, Belmont

Picture 7.138



Picture 7.139



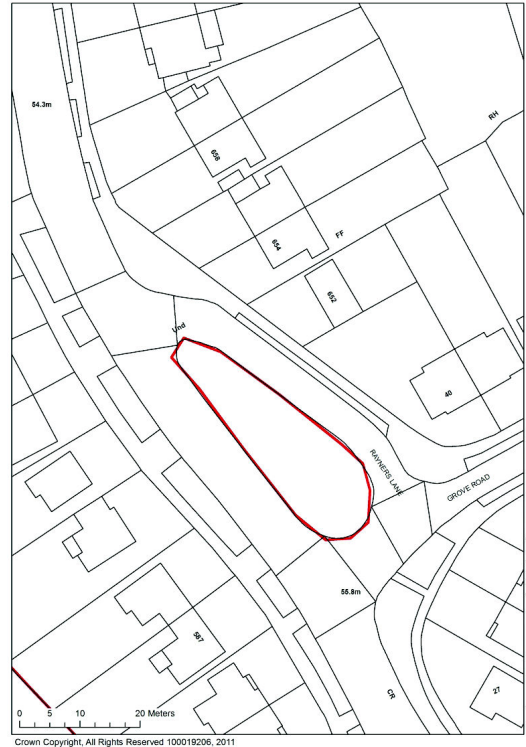
7.80 Included as open space following the PPG 17 Study (amenity greenspace typology).

Site OS 71: Junction of Grove Road and Rayners Lane

Picture 7.140



Picture 7.141



7.81 Included as open space following community consultation (amenity greenspace typology)

8 Biodiversity

8.1 The Borough contains a number of sites have been recognised by Greenspace Information for Greater London as Sites of Importance for Nature Conservation (SINCs). The SINCs designated prior to 2003 are identified on the Harrow Unitary Development Plan (2004) proposals map. Since that time additional sites worthy of SINC designation have emerged, whilst the boundaries of some existing sites have been identified as needing revision. The new sites and revised boundaries will be shown on an updated Harrow proposals map.

8.2 Sites of Importance for Nature Conservation are classified in accordance with the following hierarchy:

- Sites of Metropolitan Importance: these are sites which contain the best examples of London's habitats;
- Sites of Borough Importance: these are sites which contain the best examples of the Borough's habitats, and are further classified as grade I or grade II sites;
- Sites of Local Importance: these are sites of more local importance to neighbourhoods and schools.

Site Allocations Pre-Submission DPD

8.3 The additional sites and revisions included in this document have been brought forward through Harrow's Biodiversity Action Plan and in partnership with Greenspace Information for Greater London. The following section identifies each of the new and revised sites. They are displayed as follows:

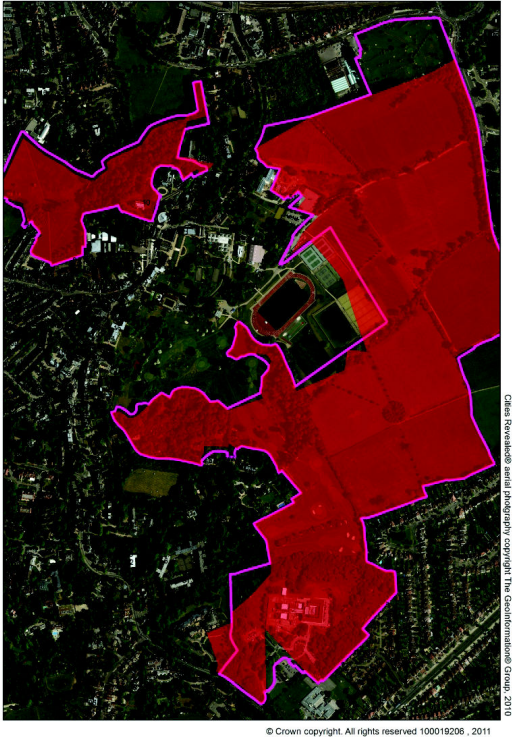
- New sites are shown with a green outline;
- Existing sites are shaded in red with the new or revised part of the site outlined in red (but not highlighted).

8.4 The sites are arranged in relation to the following areas, based on the policy sub areas identified in the Harrow Core Strategy (2012):

- Harrow-on-the-Hill & Sudbury Hill;
- South Harrow;
- Rayners Lane & North Harrow;
- Pinner & Hatch End;
- Stanmore & Harrow Weald;
- Edgware & Burnt Oak; and
- Harrow & Wealdstone (excluding sites within the Intensification Area, which will be identified through the separate Area Action Plan development plan document).

Harrow on the Hill and Sudbury Hill Sub Area

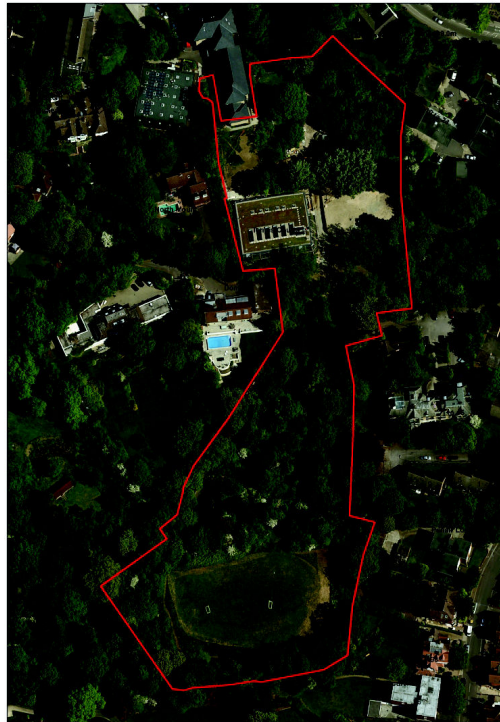
Picture 8.1 Site BD1: Harrow on the Hill - Revised Site of Borough Importance Grade 1



Picture 8.2 Site BD2: Orley Farm School Nature Reserve - New Site of Local Importance



Picture 8.3 Site BD3: St Dominic's Sixth Form College - New Site of Borough Importance Grade 2



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South Harrow Sub Area

Picture 8.4 Site BD4: Newton Park and Newton Ecology Park - Revised Site of Local Importance



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Picture 8.5 Site BD5: Wood End Railway Crossing and Roxeth Park - Revised Site of Borough Importance Grade 1



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Rayners Lane and North Harrow Sub Area

Picture 8.6 Site BD6: Old Tennis Courts, West Harrow Recreation Ground and Ridgeway Embankment - Revised Site of Local Importance



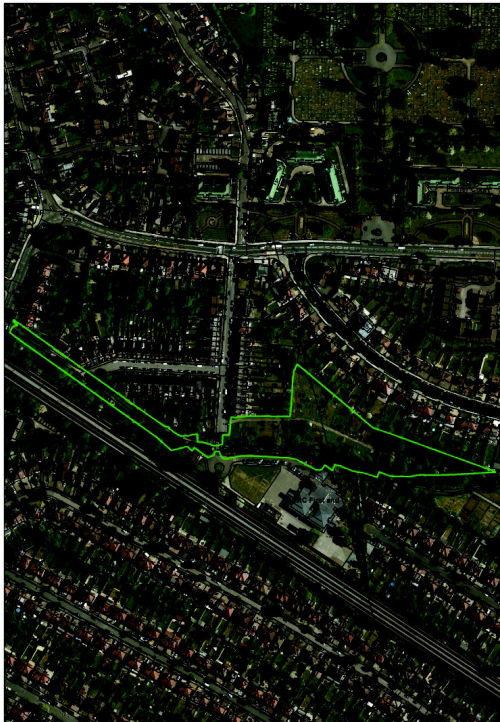
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Picture 8.7 Site BD7: Headstone Manor Recreation Ground - Revised Site of Borough Importance Grade 2



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Picture 8.8 Site BD8: Woodlands Open Space and Melrose Allotments - New Site of Local Importance



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Picture 8.9 Site BD9: Pinner New Cemetery Footpath - New Site of Local Importance



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Picture 8.10 Site BD10: Yeading Brook (North Harrow) - Revised Site of Borough Importance Grade 2



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Picture 8.11 Site BD11: Yeading Brook (Rayners Lane) - Revised Site of Borough Importance Grade



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Picture 8.12 Site BD12: Yeading Brook (Roxbourne Park) - Revised Site of Borough Importance Grade

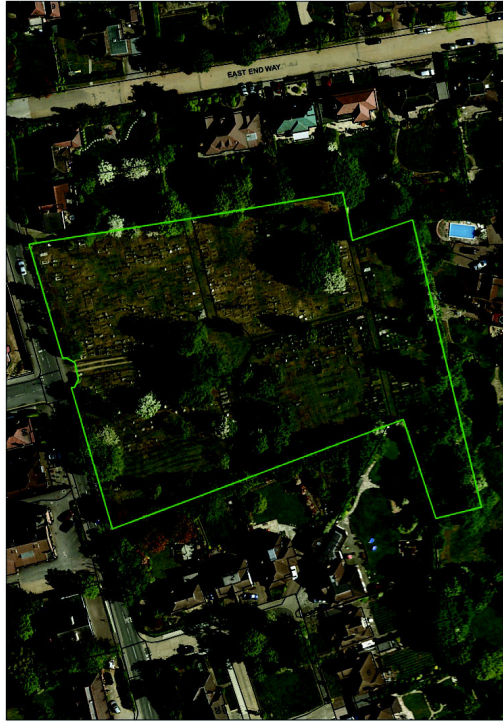


Picture 8.13 Site BD13: Rayners Lane Railside Land - Revised Site of Borough Importance Grade 2



Pinner and Hatch End Sub Area

Picture 8.14 Site BD14: Paines Lane Cemetery - New Site of Local Importance



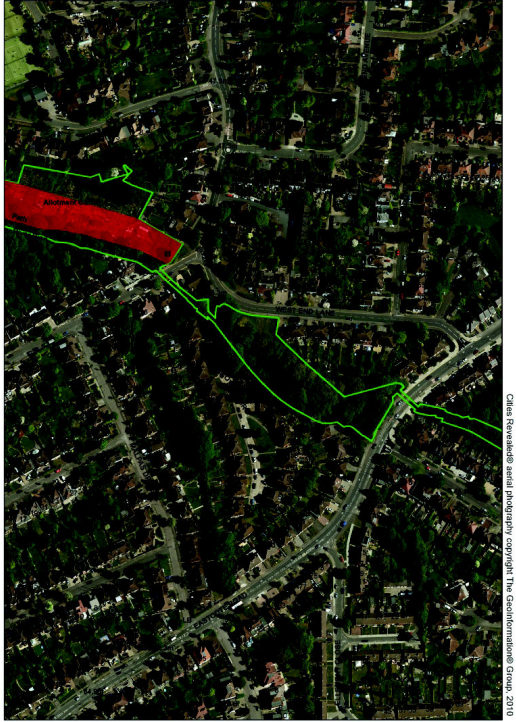
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Picture 8.15 Site BD15: Pinner Hill Golf Course - Revised Site of Borough Importance Grade 2



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Picture 8.16 Site BD16: River Pinn (Eastcote Lane/West End Lane section) - Revised Site of Local Importance



Picture 8.17 Site BD17: River Pinn (Cannon Lane section) - Revised Site of Local Importance



Picture 8.18 Site BD18: River Pinn (Cuckoo Hill section) - Revised Site of Local Importance



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Picture 8.19 Site BD19: Woodridings Brook - New Site of Local Importance



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Picture 8.20 Site BD20: Grims Ditch and Pinner Green (Montesole Playing Fields) - Revised Site of Borough Importance Grade 2



Picture 8.21 Site BD21: Grims Ditch (Saddlers Mead) - Revised New Site of Local Importance



**Picture 8.22 Site BD22: Grail Centre
- New Site of Borough Importance
Grade 2**



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**Picture 8.23 Site BD23: Oxhey Lane
Farm - Revised Site of Borough Importance
Grade 2**



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**Picture 8.24 Site BD24: Hatch End
Arts Centre - New Site of Local
Importance**



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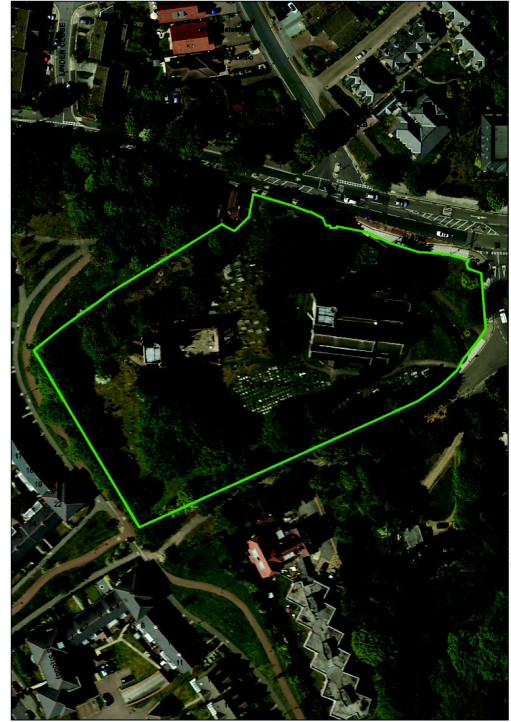
Stanmore and Harrow Weald Sub Area

Picture 8.25 Site BD25: Watling Street Verge - New Site of Local Importance



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Picture 8.26 Site BD26: St John the Evangelist Stanmore - New Site of Local Importance



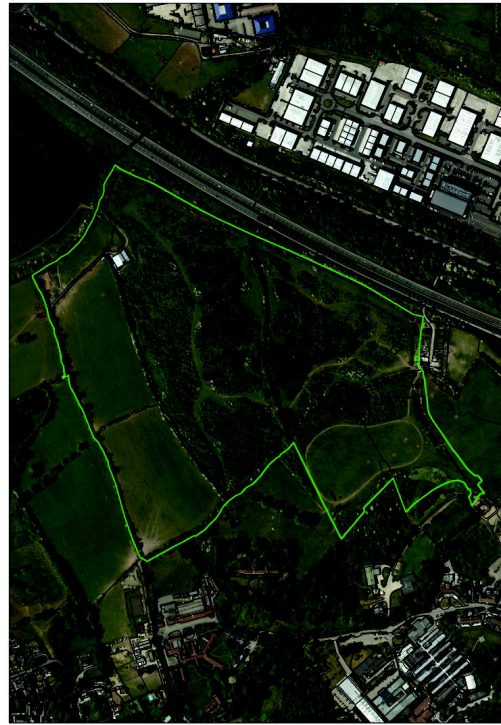
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Picture 8.27 Site BD27: The Rattler (part) - Revised Site of Local Importance



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Picture 8.28 Site BD28: Watling Chase Plantation Site - New Site of Local Importance

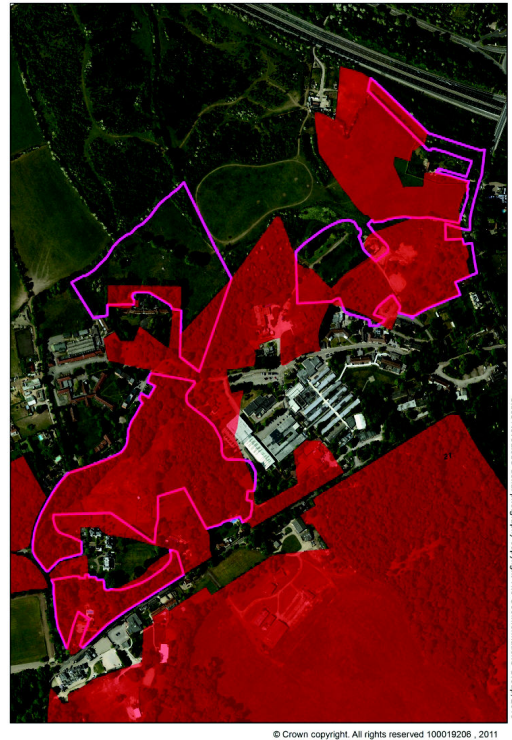


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Picture 8.29 Site BD29: The Rattler (part) - Revised Site of Local Importance



Picture 8.30 Site BD30: Royal National Orthopaedic Hospital - Revised Site of Borough Importance Grade 1



Picture 8.31 Site BD31: Harrow Weald Park and Hermitage (part) -

Picture 8.32 Site BD32: Harrow Weald Park and Hermitage (part) -

**Revised Site of Borough Importance
Grade 2**



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**Revised Site of Borough Importance
Grade 2**

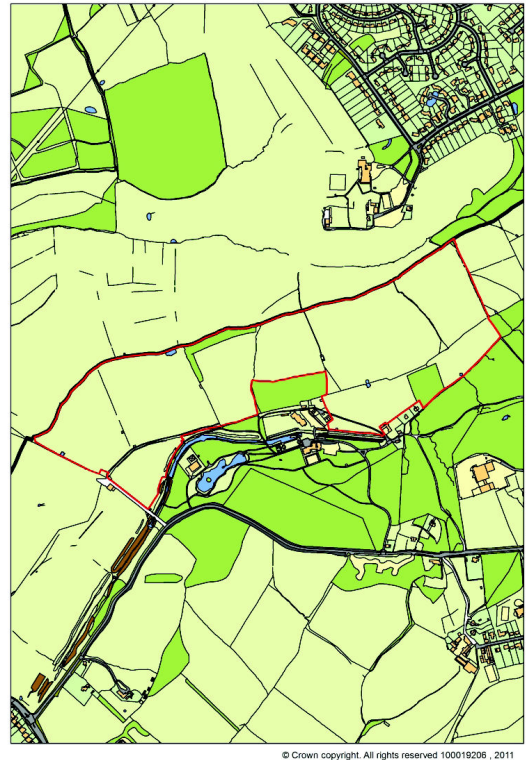


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Picture 8.33 Site BD33: Harrow Weald Park and Hermitage (part) - Revised Site of Borough Importance Grade 2



Picture 8.34 Site BD34: Grims Dyke Fram - New Site of Borough Importance Grade 2



Edgware and Burnt Oak Sub Area

**Picture 8.35 Site BD35: Canons Lake
- Revised Site of Borough
Importance Grade 2**

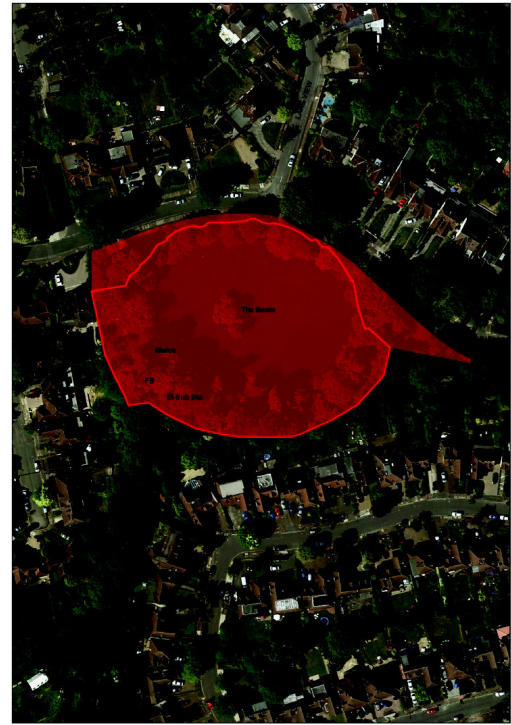


Picture 8.36 Site BD36: Stanmore Marsh - Revised Site of Borough Importance Grade 2



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Picture 8.37 Site BD37: The Basin - Revised Site of Borough Importance Grade 2



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Kenton and Belmont Sub Area

Picture 8.38 Site BD38: Edgware Brook at Whitchurch School - New Site of Local Importance



Picture 8.39 Site BD39: The Rattler (part) - Revised Site of Local Importance



9 Other

9.1 The following four sites are allocated for:

- A) Outdoor sports use,
- B) Health Clinic,
- C) Nature Reserve with enabling Housing, and;
- D) Arts and Leisure facilities

Site G01: Whitchurch Playing Fields, Wemborough Road, Stanmore



Site Details

Site Area:	10.707 hectares
Existing Use:	Playing Fields/Flood Storage
Housing Trajectory Status:	Not a housing site
Number of Homes:	None
Other Uses Proposed:	Community sports use
Ward:	Belmont
Core Strategy Sub Area:	Kenton and Belmont

Planning Designations

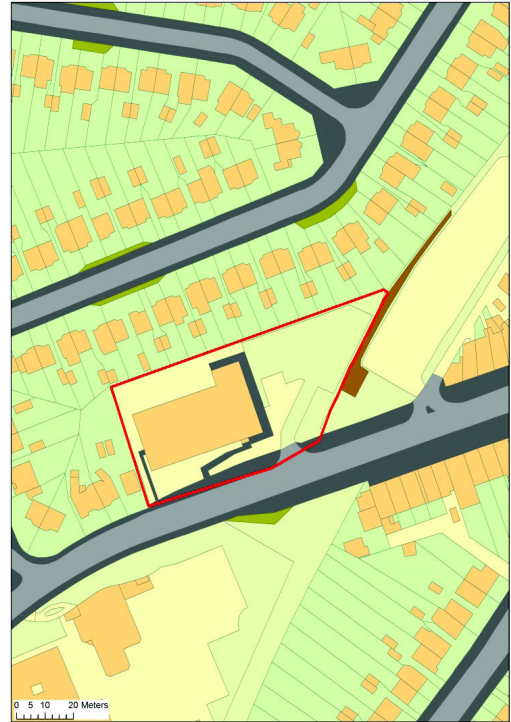
Flood Zone:	Zones 2 and 3 (medium and high probability)
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Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Open Space
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Wemborough Road part of the Borough distributor road network

Commentary

9.2 The site is currently open space and is an important recreational destination. The site is suitable for community outdoor sports use only. Development will be restricted to the minimum necessary to support outdoor sports use, and must not prejudice the role of this site as a flood storage area. Note that part of the site is identified in this Site Allocations DPD as a new local Site of Importance for Nature Conservation (BD38); any outdoor sport use of this site must be compatible with and not prejudice the nature conservation value of the site.

Site G02: Belmont Clinic, Kenton Lane, Belmont



Site Details

Site Area:	0.6
Existing Use:	Medical centre and public car park
Housing Trajectory Status:	N/A
Number of Homes:	Not a housing site
Other Uses Proposed:	Medical/Community
Ward:	Belmont
Core Strategy Sub Area:	Kenton and Belmont

Planning Designations

Flood Zone:	Zone 1 (low probability)
Town Centre:	Belmont local centre

Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Green Chain
SSSI/Site of Importance for Nature Conservation:	Site of Importance for Nature Conservation (local importance)
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Kenton Lane part of the Borough distributor network

Commentary

9.3 The site is currently identified as UDP Proposal Site 11 for appropriate town centre uses and car parking and is in use as a GP surgery. The site is suitable for a replacement Health Clinic with associated car parking.

Site G03, St Georges Playing Fields



Site Allocations Pre-Submission DPD

Site Details

Site Area:	1.7 ha (including open space)
Existing Use:	Open Space and Community Hall
Housing Trajectory Status:	Consented
Number of Homes:	27
Other Uses Proposed:	Open Space
Ward:	Headstone South
Core Strategy Sub Area:	North Harrow and Rayners Lane

Planning Designations

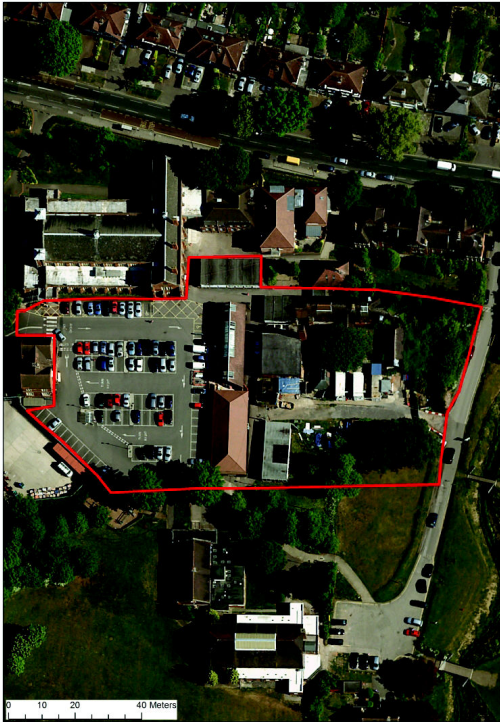
Flood Zone:	Zone 1 (low probability)
PTAL	1b
Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Yes (part)
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	Adjacent to St George's Hall and Church Grade 2 listed
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	No

Commentary

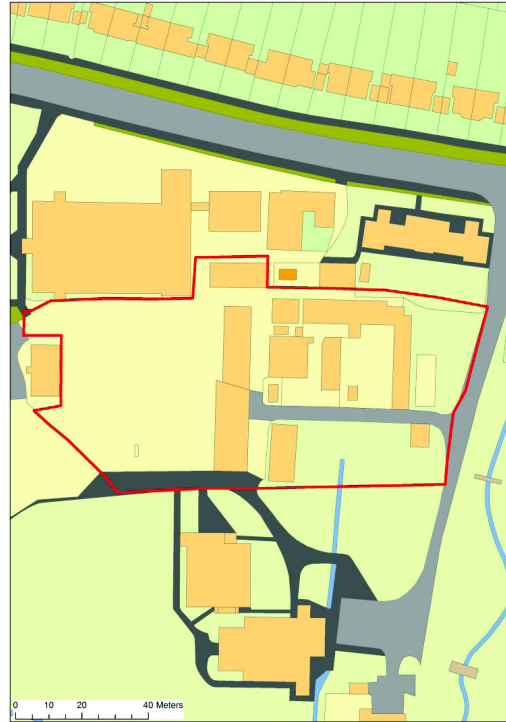
9.4 A small number of housing units have been granted permission to enable the rest of the site to become publicly accessible open space.

Site G04, Hatch End Arts Centre, Hatch End

Site G05: Harrow Arts Centre car park, library and swimming pool, Hatch End



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Site Details

Site Area:	0.72 hectares
Existing Use:	Car park, library and swimming pool, ancillary buildings
Housing Trajectory Status:	N/A
Number of Homes:	None
Other Uses Proposed:	Arts and Leisure facilities
Ward:	Hatch End
Core Strategy Sub Area:	Pinner and Hatch End

Planning Designations

Flood Zone:	Zone 1 (low probability)
Public Transport Accessibility Level:	2

Site Allocations Pre-Submission DPD

Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	No (but adjacent to Green Belt)
SSSI/Site of Importance for Nature Conservation:	Proposed SINC (Site of Local Importance) on part of site - see SINC chapter
Listed Building/Conservation Area:	Elliot Hall grade II listed
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	Uxbridge Road part of the London distributor road network

Relevant Planning History

9.5 No relevant planning history.

Commentary

9.6 The site includes Elliot Hall, which is listed (grade II), and open land to the south (including Hatch End library and swimming pool) which forms part of the Green Belt. Proposals for Cultural and Leisure facilities that enhance or compliment the current uses on site will be supported. Appropriate car parking provision will need to be maintained.

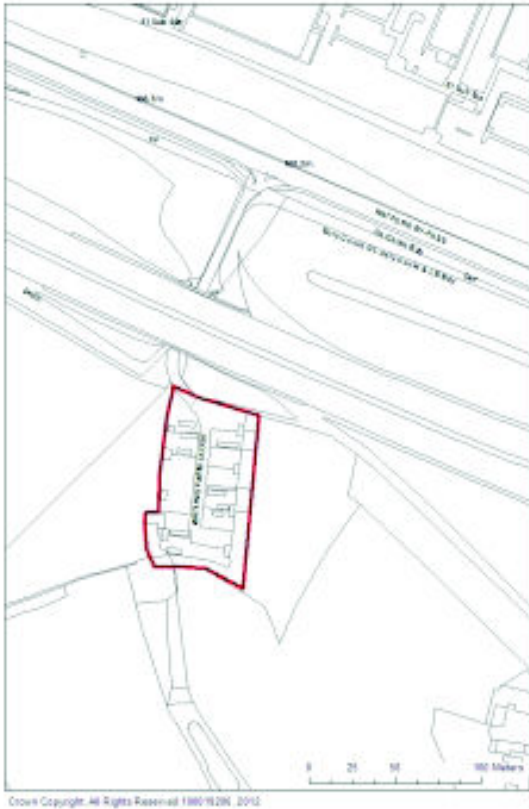
9.7 In developing the site, particular care will be needed to preserve and enhance the setting of Elliot Hall, together with any curtilage listed buildings, and to provide an appropriate built context for the adjoining Green Belt.

9.8 The adjoining open land has recently benefited from works to deculvert the River Pinn and associated improvements for sustainable flood management and biodiversity. Development of the site may need to contribute to further deculverting of the River Pinn. The design and layout of development should also have regard to the proposed new Site of Importance for Nature Conservation.

9.9 There is a culverted ordinary watercourse which runs through this site. The exact location of this watercourse should be determined at the earliest opportunity to ensure that no buildings are built, or planned to be built, over or within 5 metres of its outer walls. Identifying the exact watercourse location will also enable any buffer zones or potential restoration to be factored in to the site design. All opportunities to de culvert this ordinary watercourse should be sought. In addition the provision of a minimum 5 metre undeveloped buffer strip should be provided from the outer edge of any proposed permanent building to the top of bank of the watercourse. This is in line with Harrow's Core Strategy, Policy 15 of the Draft Development Management DPD, recommendations within the London Borough of Harrow's SFRA and the Mayor's London Plan.

Site G05, Watling Farm Gypsy Site

Site G05: Watling Farm Gypsy Site



Site Details

Site Area:	0.5ha
Existing Use:	Gypsy and Traveller Site
Housing Trajectory Status:	N/A
Number of Homes:	None
Other Uses Proposed:	Gypsy and Traveller Site (Safeguarded)
Ward:	Canons
Core Strategy Sub Area:	Stanmore and Harrow Weald

Planning Designations

Flood Zone:	Zone 1 (low probability)
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Site Allocations Pre-Submission DPD

Public Transport Accessibility Level:	1a
Town Centre:	No
Employment Land:	No
Area of Special Character:	Yes
Green Belt/Metropolitan Open Land/Open Space:	Green Belt
SSSI/Site of Importance for Nature Conservation:	Yes - Local
Listed Building/Conservation Area:	No
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

Relevant Planning History

9.10 No relevant planning history.

Commentary

9.11 This site is safeguarded for 3 Gypsy and Traveller pitches.

Site G06, Kenton Lane Farm

Site G06: Kenton Lane Farm



Site Details

Site Area:	0.74ha
Existing Use:	
Housing Trajectory Status:	N/A
Number of Homes:	
Other Uses Proposed:	Enabling Housing
Ward:	Kenton West
Core Strategy Sub Area:	Kenton and Belmont

Planning Designations

Flood Zone:	Zone 1 (low probability)
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Site Allocations Pre-Submission DPD

Public Transport Accessibility Level:	1
Town Centre:	No
Employment Land:	No
Area of Special Character:	No
Green Belt/Metropolitan Open Land/Open Space:	Open Space
SSSI/Site of Importance for Nature Conservation:	No
Listed Building/Conservation Area:	Yes, Grade 2 listed buildings in site envelope
Historic Park and Garden:	No
Scheduled Ancient Monument:	No
Archaeological Priority Area:	No
Other:	None

Relevant Planning History

9.12 No relevant planning history.

Commentary

9.13 This site is allocated for enabling residential development to allow for the restoration of the listed buildings, and public access to the open space on site. Any development must ensure that the listed buildings setting is enhanced, especially to the east of the site where it adjoins the road.

Site G07, Harrow School, Harrow on the Hill

Site G07: Harrow School

Site Details

Site Area:	
Existing Use:	
Housing Trajectory Status:	N/A
Number of Homes:	
Other Uses Proposed:	
Ward:	Harrow on the Hill

Core Strategy Sub Area:

Harrow and Sudbury Hill

Planning Designations

Flood Zone:

Zone 1 (low probability)

Public Transport Accessibility Level:

Town Centre:

No

Employment Land:

No

Area of Special Character:

Yes

Green Belt/Metropolitan Open Land/Open Space:

Metropolitan Open Land

SSSI/Site of Importance for Nature Conservation:

Listed Building/Conservation Area:

Yes, listed buildings and conservation area

Historic Park and Garden:

Scheduled Ancient Monument:

No

Archaeological Priority Area:

Other:

None

Relevant Planning History

9.14 No relevant planning history.

Commentary

9.15 The

Appendix 1 Housing Schedule

Introduction

1.1 Harrow's Core Strategy (2012) provides a commitment to deliver at least 6,050 net additional homes in the Borough over the seventeen year period from 2009/10 to 2025/26. The Harrow & Wealdstone Intensification Area is tasked to deliver at least 2,800 of the 6,050 homes needed. Site allocations and development management policies to enable that level of housing growth to be achieved and, where possible, exceeded within the Intensification Area will be set out in a separate development plan document: the Harrow & Wealdstone Area Action Plan. Whilst 2,800 homes represents a substantial proportion of the Borough's housing target, this still leaves a balance of at least 3,250 homes to delivered on land outside of the Intensification Area⁰.

1.2 This Appendix demonstrates how it is intended that the balance of 3,250 homes will be met and exceeded outside of the Intensification Area, and indicates a broad distribution of growth by sub area in accordance with the Harrow Core Strategy (2012). The following table summarises the past, pipeline and planned delivery on previously developed land in each of the Core Strategy sub areas⁰ for the period 2009/10 to 2025/26.

Delivery Summary 2009/10 to 2025/26

Core Strategy Sub Area	Completions 2009/10 & 2010/11		Allocated Sites		Pipeline Supply - Large Sites		Pipeline Supply - Small Sites		Totals	
	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
Harrow-on-the-Hill & Sudbury Hill	54	49	150	145	21	20	17	12	242	226
South Harrow	294	247	149	149	0	0	52	37	495	433
Rayners Lane & North Harrow	117	87	227	227	166	76	79	52	589	442
Pinner & Hatch End	52	34	48	48	158	48	71	48	329	178
Slammore & Harrow Weald	22	9	782	754	0	0	90	56	894	819
Edgware & Burnt Oak	231	218	425	425	641	634	47	33	1,344	1,310
Kingsbury & Queensbury	20	17	0	0	0	0	22	15	42	32

For the avoidance of doubt, the effect of this Site Allocations DPD and the Harrow & Wealdstone AAP is not to disaggregate the Borough-wide target into two separate, minimum targets. Therefore, it will not be a material consideration if development to achieve 3,250 homes outside of the Intensification Area is not on track when overall delivery against the Borough target of at least 6,050 homes is on track as a result of growth in excess of 2,800 homes within the Intensification Area including those parts of the Harrow & Wealdstone sub area that are outside of the Intensification Area boundary.

Core Strategy Sub Area	Completions 2009/10 & 2010/11		All located Sites		Pipeline Supply - Large Sites		Pipeline Supply - Small Sites		Totals	
Kenton & Belmont	22	10	0	0	0	0	17	10	39	20
Harrow & Wealdstone (excluding Intensification Area)	179	101	14	10	0	0	67	46	260	157
Totals	991	772	1,795	1,758	986	778	462	309	4,234	3,617

1.3 Data used in this Appendix is taken from that published in Harrow's Annual Monitoring Report for the period 2010/11, published 31st December 2011, except where otherwise indicated.

Completions

1.4 As noted above, Harrow's Core Strategy housing target spans a seventeen year period from 2009/10 to 2025/26. The base year of 2009/10 was used for consistency with the London-wide Strategic Housing Land Availability Assessment/Housing Capacity Study, carried out during 2009 and which informed the preparation of the London Plan (2011). Over the two years 2009/10 and 2010/11, a net contribution of 894 homes was made the Borough's housing supply of which 772 were completed on sites outside of the Harrow & Wealdstone Intensification Area.

1.5 The following table identifies completions from all sources for the period 2009/10 to 2010/11 by Core Strategy sub area, including those parts of the Harrow & Wealdstone sub area that are outside of the Intensification Area.

Completions 2009/10 & 2010/11

Core Strategy Sub Area	Source	Capacity	
		Gross	Net
Harrow-on-the-Hill & Sudbury Hill	Completions 2009/10 & 2010/11	54	49
South Harrow	Completions 2009/10 & 2010/11	294	247
Rayners Lane & North Harrow	Completions 2009/10 & 2010/11	117	87
Pinner & Hatch End	Completions 2009/10 & 2010/11	52	34
Stammore & Harrow Weald	Completions 2009/10 & 2010/11	22	9
Edgware & Burnt Oak	Completions 2009/10 & 2010/11	231	218
Kingsbury & Queensbury	Completions 2009/10 & 2010/11	20	17
Kenton & Belmont	Completions 2009/10 & 2010/11	22	10
Harrow & Wealdstone (c/s Intensification Area)	Completions 2009/10 & 2010/11	179	101

Core Strategy Sub Area	Source	Capacity	
		Gross	Net
Total:		991	772

Allocated Sites

1.6 The following table summarises all of the sites allocated in this Development Plan Document with an attributed housing capacity. Sites marked with the status 'identified site' are those listed as 'Allocated and other Identified Sites' in Harrow's Annual Monitoring Report (2010/11) Housing Trajectory. Sites marked with the status 'permission granted' are those listed in the Annual Monitoring Report as 'Large Sites not under construction at end of 2010/11'. 'Legal agreement' indicates that the Council has resolved to grant planning permission subject to a s.106 Planning Obligation.

1.7 A small number of sites have been allocated that do not appear in Harrow's Annual Monitoring Report (2010/11) Housing Trajectory. Those marked 'new site' have come to light as part of the preparation of this Development Plan Document and will be included as part of the Housing Trajectory in future Reports. Those marked 'less than 10' are sites with an estimated capacity of less than ten homes and therefore do not appear on the Trajectory of future delivery.

1.8 The Housing Trajectory estimates likely delivery for each year to 2025/26. 'Short term' refers to the initial five year period 2011/12 to 2015/16; 'Medium term' refers to the period 2016/17 to 2020/21; and 'Long term' refers to the period 2021/22 to 2025/26.

Housing Capacity of Allocated Sites

Core Strategy Sub Area	Allocation Number	Page	Address	Capacity		Status	Term
				Gross	Net		
Harrow-on-the-Hill & Hill	H1		1-5 Sudbury Hill, Harrow, HA1 3SB	54	49	Legal agreement	Short
	H2		94-110 Greenford Road, Harrow, HA1 3QL	23	23	Identified site	Medium
	H3		79-89 Greenford Road, Harrow, HA1 3QF	23	23	Identified site	Long
South Harrow	H4		Northolt Road business use area - north	50	50	Identified site	Long
	H5		Northolt Road business use area - south	100	100	Identified site	Long
	H6		205-209 Northolt Road, South Harrow, HA2 0NG	10	10	Identified site	Medium
	H7		Roxelth Library and clinic, Northolt Road, South Harrow, HA2 8EQ	34	34	Identified site	Long
	H8		1 & 1A Silverdale Close, Northolt, UB5 4BL	5	5	Less than 10	N/A
Rayners Lane & North Harrow	H9		Vaughan Centre, Wilson Gardens, West Harrow, HA1 4EA	13	13	Permission granted	Short

Core Strategy Sub Area	Allocation Number	Page	Address	Capacity		Status	Term	
				Gross	Net			
Pinner & Hatch End	H10		Enterprise House, Pinner Road, North Harrow, HA1 4HS	6	6	Less than 10	N/A	
	H11		North Harrow Library and Children's Services, 429/433 Pinner Road, North Harrow, HA1 4HN	18	18	Identified site	Long	
	H12		Rayners Lane District Centre offices, Imperial Drive, Rayners Lane	150	150	Identified site	Long	
	H13		Rayners Hotel, Village Way East, Rayners Lane, HA2 7LX	28	28	Identified site	Short	
	H14		Rayners Lane Station Car Park, High Worples, Rayners Lane, HA5 5EG	12	12	Identified site	Medium	
	H15		Land rear of 57-65 Bridge Street, Pinner, HA5 3HZ	26	26	Permission granted	Short	
	H16		Land adjacent to Harrow Arts Centre, Uxbridge Road, Hatch End, HA5 4EA	22	22	Identified site	Medium	
	H17		The Boxtree Public House, Boxtree Lane, Harrow Weald, HA3 6JH	14	14	Permission granted	Short	
	Stanmore & Harrow Weald	H18		Harrow College, Harrow Weald Campus, Brookshill, HA3 6RR	154	154	Identified	Long
		H19		Former RAF Bentley Priory, The Common, Stanmore	103	103	Permission granted	Short
		H20		Royal National Orthopaedic Hospital, Brockley Hill, Stanmore, HA7 4LP	191	191	Permission granted	Short/Medium
	Harrow & Wealdstone (o/s Intensification Area)	H21		Stanmore Station Car Park, London Road, Stanmore, HA7 4PD	70	70	Identified	Long
		H22		Jubilee House, London Road/Merrion Avenue, Stanmore, HA7 4RS	35	35	Identified	Medium
		H23		Anmer Lodge & Stanmore Car Park, The Broadway, Stanmore	136	136	Identified	Short/Medium
H24			11-26, 28 & 30 Douglas Close, Stanmore, HA7 3SP	79	51	Permission granted	Short	
H25			Ballard Mews business use area	30	30	Identified site	Long	
H26			Sunley House, 57-61 High Street, Edgware, HA8 7DD	51	51	New site	N/A	
H27			47-49 High Street, Edgware, HA8 7DD	86	86	Identified site	Long	
H28			Edgware Town Football Club, Burnt Oak Broadway, Edgware, HA8 5AQ	189	189	Permission granted	Short	
H29			Canons Park Station Car Park, Donnelfield Avenue, Edgware, HA8 6RN	20	20	New site	N/A	
H30			19 Buckingham Road, Edgware, HA8 6LY	7	7	Less than 10	N/A	
Harrow & Wealdstone (o/s Intensification Area)	H31		Hill's Yard, Bacon Lane, Edgware, HA8 5AR	28	28	Identified	Medium	
	H32		415 Burnt Oak Broadway, Edgware, HA8 5AH	14	14	Permission granted	Short	
	H33		5-11 Manor Road, Harrow, HA1 2NZ	14	10	Permission granted	Short	
Total:				1,795	1,758			

Pipeline Supply - Large Sites

- 1.9** Pipeline supply refers to new homes which have already been granted planning permission and are underway, but have not yet been completed. Large sites are those with a capacity to deliver 10 or more homes.
- 1.10** The following table shows the pipeline supply of homes from large sites, taken from Harrow's Annual Monitoring Report (2010/11) Housing Trajectory list of sites under construction at end of 2010/11. As these sites already have planning permission and are in the process of being implemented there is no need to allocate them, but they will make a net contribution of 768 homes towards housing delivery during the plan period. Some large sites are subject to phasing and any homes delivered during the period 2009/10 - 2010/11 are included under 'Completions' above.
- 1.11** Harrow's Annual Monitoring Report (2010/11) Housing Trajectory includes a list of large sites that have already been granted planning permission but where construction had not yet commenced by the end of 2010/11. Such sites are included under 'Allocated Sites' above where their allocation for development would not conflict with the policies of the Core Strategy.

Outstanding Housing Capacity of Large Sites Under Construction

Core Strategy Sub Area	Address	Capacity		Status	Estimated completion
		Gross	Net		
Harrow-on-the-Hill & Sudbury Hill	The Timber Carriage, Northolt Road	21	20	Permission granted	2011/12
Rayners Lane & North Harrow	Strongbridge Close Estate	154	64	Permission granted	2012/13
	90-100 Pinner Road	12	12	Permission granted	2011/12
Pinner & Hatch End	Mill Farm Close Estate	158	48	Permission granted	2014/15
Edgware & Burnt Oak	Stanmore Place, Honeypot Lane	627	624	Permission granted	2015/16
	287-293 Whitchurch Lane	14	10	Permission granted	2012/13
Total:		986	778		

Pipeline Supply - Small Sites

- 1.12** Small sites are those with a capacity to deliver 9 or fewer homes. The pipeline supply of small sites includes new build schemes with planning permission either under construction or not yet started, and change of use or conversion schemes with planning permission either in the process of being implemented or not yet implemented. In view of the large number of small sites and their modest individual contribution to housing supply, the Council does not consider that it is not appropriate to allocate those small sites with planning permission but which have not yet started.

1.13 The number of lapsed (unimplemented) residential planning permissions is recorded in Harrow's Annual Monitoring Report. Historically, the number of lapses is very low - the average for the period 2001/02 to 2010/11 is 17 per annum. The average number of residential planning permissions granted over the same period is 152 per annum, so the average lapse rate is 11%. The Council therefore considers that there is a reasonable prospect that most of the supply from small sites with planning permission but not yet underway (totalling 232 homes) will come forward in the short term. In accordance with PPS 3 *Housing* no allowance is made for the contribution towards housing supply from future windfall development; nevertheless it is likely that small sites will continue to make some modest contribution to housing supply negating the impact of any lapses upon the 232 homes currently consented but not yet underway on small sites outside of the Intensification Area.

Outstanding Housing Capacity of All Small Sites

Core Strategy Sub Area	Source	Capacity	
		Gross	Net
Harrow-on-the-Hill & Sudbury Hill	Small sites with planning permission not yet under construction	4	3
	Small sites under construction	0	0
	Small conversions/changes of use not yet being implemented	13	9
	Small conversions/changes of use being implemented	0	0
	Sub area total:	17	12
	Small sites with planning permission not yet under construction	11	7
South Harrow	Small sites under construction	8	8
	Small conversions/changes of use not yet being implemented	25	17
	Small conversions/changes of use being implemented	8	5
	Sub area total:	52	37
	Small sites with planning permission not yet under construction	28	22
	Small sites under construction	3	2
Rayners Lane & North Harrow	Small conversions/changes of use not yet being implemented	39	22
	Small conversions/changes of use being implemented	9	6
	Sub area total:	79	52
	Small sites with planning permission not yet under construction	38	27
	Small sites under construction	15	10
	Small conversions/changes of use not yet being implemented	16	10
Pinner & Hatch End	Small conversions/changes of use being implemented	2	1

Site Allocations Pre-Submission DPD

Core Strategy Sub Area	Source	Capacity	
		Gross	Net
Stammore & Harrow Weald	Sub area total:	71	48
	Small sites with planning permission not yet under construction	55	35
	Small sites under construction	9	4
	Small conversions/changes of use not yet being implemented	21	14
	Small conversions/changes of use being implemented	5	3
	Sub area total:	90	56
Edgware & Burnt Oak	Small sites with planning permission not yet under construction	6	6
	Small sites under construction	0	0
	Small conversions/changes of use not yet being implemented	31	22
	Small conversions/changes of use being implemented	10	5
	Sub area total:	47	33
	Small sites with planning permission not yet under construction	1	1
Kingsbury & Queensbury	Small sites under construction	11	9
	Small conversions/changes of use not yet being implemented	8	4
	Small conversions/changes of use being implemented	2	1
	Sub area total:	22	15
	Small sites with planning permission not yet under construction	1	0
	Small sites under construction	2	2
Kenton & Belmont	Small conversions/changes of use not yet being implemented	10	5
	Small conversions/changes of use being implemented	4	3
	Sub area total:	17	10
	Small sites with planning permission not yet under construction	20	15
	Small sites under construction	0	0
	Small conversions/changes of use not yet being implemented	24	13
Harrow & Wealdstone (c/s Intensification Area)	Small conversions/changes of use not yet being implemented	23	18
	Small conversions/changes of use being implemented	67	46
	Sub area total:	462	309
	Total:		

Appendix 2 Housing Capacity Methodology

Methodology for Assessing the Capacity of Allocated Sites

2.1 On large sites where planning permission for residential development has already been granted, but where material works have not commenced, the site has been allocated in this Development Plan Document with the corresponding number of homes that have been approved. Where details of pre-application proposals are available and considered reasonable, the relevant housing capacity figure has also been used to inform the site allocation. For other sites, the potential housing capacity of the site has been estimated in accordance with the methodology described below. It should be noted that the housing capacity attributed to each site is indicative, not prescriptive. The number of dwellings that may be achieved on site may be determined by many considerations such as design and layout, the size and type of the homes to be provided, relevant development management policy requirements, site constraints, scheme viability, the site area available for development and any change in the public transport accessibility level (PTAL) of the site.

2.2 London Plan (2011) Policy 3.4 seeks to optimise housing output having regard to a sustainable residential quality density matrix (London Plan Table 3.2). The matrix sets out appropriate density ranges, expressed as units per hectare, based on the average number of habitable rooms per unit in different settings and according to the public transport accessibility level of the site. The settings are categorised as central, urban and suburban, and a definition for each setting is provided. Public transport accessibility is grouped as 0 to 1, 2 to 3 and 4 to 6, where 0 represents poor public transport accessibility and 6 represents a high level of public transport accessibility.

2.3 For the purposes of allocating sites with no planning history, where no details of unit size/mix is available, and to ensure a consistent approach that does not over estimate capacity by assuming the development of only smaller homes nor under-estimate capacity by assuming the development of only larger homes, the Council has assessed the potential capacity of housing development on sites based on 50% at the range 2.7-3.0 habitable rooms per unit and 50% at the range 3.8-4.6 habitable rooms per unit. For each habitable room range, setting and public transport accessibility level, the matrix provides an appropriate density expressed as a range of units per hectare. Again, to ensure that the estimation of site capacity is not skewed towards the lower or upper end of each range, the number of homes attributed to each site is taken as the sum of the median number of homes within each density range relevant at 50% smaller homes + 50% larger homes.

2.4 The following worked examples illustrate how the methodology has been applied.

Box 1

Example 1: Sunley House, 57-61 High Street, Edgware

Site Area: 0.19 hectares

PTAL: 6

Setting: Central

LP density matrix ranges: 50% at 140-290 units per hectare; 50% at 215-405 units per hectare

- $140 \times 0.19\text{ha} = 27$ homes
- $290 \times 0.19\text{ha} = 55$ homes
- Median of 27 and 55 homes is $41 \times 0.5 = 21$ homes
- $215 \times 0.19\text{ha} = 41$ homes
- $405 \times 0.19\text{ha} = 77$ homes
- Median of 41 and 77 homes is $59 \times 0.5 = 30$ homes

Capacity of site is therefore $21 + 30 = \mathbf{51}$ homes

Box 2

Example 2: Canons Park Station Car Park

Site Area: 0.41 hectares

Site Area for Development: 0.2 hectares (it is assumed that half of the site would be retained to continue to provide station car parking facilities)

PTAL: 3

Setting: Urban

LP density matrix ranges: 50% at 45-120 units per hectare; 50% at 70-170 units per hectare

- $45 \times 0.2\text{ha} = 9$ homes
- $120 \times 0.2\text{ha} = 24$ homes
- Median of 9 and 24 homes is $16 \times 0.5 = 8$ homes
- $70 \times 0.2\text{ha} = 14$ homes
- $170 \times 0.2\text{ha} = 34$ homes
- Median of 14 and 34 homes is $24 \times 0.5 = 12$ homes

Capacity of site is therefore $8 + 12 = \mathbf{20}$ homes

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Preface

This revision to the Local Development Scheme (LDS) replaces all early versions brought into effect in June 2005, November 2006, November 2007 and January 2011. This revised LDS (version 5) is intended to update the timetable for the production of Harrow's remaining LDF documents to comply with the Localism Act 2011.

To ensure the Council stands the best possible chance of its DPDs being found sound by the Planning Inspectorate at an examination in public, the following summarises the main amendments to this version of the LDS:

- revised timeframes for the production of the joint West London Waste Plan DPD, Development Management Policy DPD, Harrow and Wealdstone Area Action Plan DPD and Site Specific Allocation DPD;
- provide the time necessary to complete a robust evidence base in support of the DPDs that accords to recent changes to national planning legislation and policy guidance;
- amend the format and some content of the LDS document to clarify and simplify existing sections of the LDS to avoid confusion or unnecessary repetition
- to provide update the list of adopted planning documents

Important Note: This document replaces all previous versions of the Local Development Scheme previously brought into effect in June 2005, November 2006, November 2007, and January 2011.

LDS version	Date brought into effect	Date cancelled / superseded
Version 1	June 2005	November 2006
Version 2	November 2006	November 2007
Version 3	November 2007	January 2011
Version 4	January 2011	TBC
Version 5	July 2012	Not applicable

1 Introduction

1.1 This Local Development Scheme (LDS) sets out Harrow Council's revised programme for preparing its Local Development Framework (LDF). The LDF seeks to give effect to national and regional policies and the local community's aspirations for the Borough,

as set out in the Harrow Sustainable Community Plan (2009) and other Council strategies. Its purpose is to guide the quantity, quality and location of new development in Harrow and ensure it is delivered in a sustainable manner by being matched by social and physical infrastructure.

- 1.2** The LDF is a suite of planning documents which all form the Council's Local Plan. These must include the following documents:
- Core Strategy (Adopted);
 - Statement of Community Involvement (SCI);
 - Authorities Monitoring Report (AMR); and
 - Local Development Scheme (LDS).
- 1.3** It can also include other documents, either area or topic based, which can be Development Plan Documents (DPDs) with full development plan status, or Supplementary Planning Documents (SPDs) that provide detail on how DPD policies are to be interpreted and are therefore a material consideration when determining planning applications (see section 3).
- 1.4** This LDS supersedes the Council's adopted LDS published in January 2011. The adopted 2011 LDS set out a programme to prepare several DPDs and some SPDs. The Council has to date adopted the following LDF documents:
- Access for All SPD (April 2006)
 - The Statement of Community Involvement (August 2006)
 - RAF Bently Priory SPD (October 2007)
 - Harrow on the Hill SPD (May 2008)
 - Sustainable Building Design SPD (May 2009)
 - Pinner Conservation Area SPD (December 2009)
 - Accessible Homes SPD (March 2010)
 - Residential Design Guide SPD (December 2010)
 - Core Strategy DPD (February 2012)
- 1.5** The Council is in the process of preparing the following development plan documents
- Harrow and Wealdstone Area Action Plan DPD
 - Development Management Policies DPD
 - Site Allocations DPD
 - Joint West London Waste Plan DPD
- 1.6** This LDS has been prepared to take account of the Council's priorities and its commitment to resource and deliver the Local Plan. It also takes account of new Acts and revised regulations that govern the plan-making process⁽¹⁾
- 1.7** To support and give effect to Local Plan policies, the Council is also intending to prepare a number of Supplementary Planning Documents (SPDs) including:
- Harrow Weald Conservation Area SPD
 - Stanmore and Edgware Conservation Area SPD

1 Town and Country Planning (Local Development) (England) (Amendment)¹ Regulations 2008 and the Localism Act 2011

- Affordable Housing SPD
- Planning Obligations SPD

2 The Development Plan for Harrow

2.1 Planning applications for development must be determined in accordance with the development plan for the area unless material considerations indicate otherwise⁽²⁾. The development plan for Harrow currently comprises:

- The London Plan (July 2011).
<http://www.london.gov.uk/priorities/planning/londonplan>
- The Core Strategy Development Plan Document <http://www.harrow.gov.uk/ldf>
- Saved Policies of the Harrow Unitary Development Plan (UDP) (July 2004).
http://www.harrow.gov.uk/downloads/file/2026/deleted_udp_policies. Further UDP policies were deleted after the adoption of the Core Strategy in February 2012 and are listed in Appendix D of that document.

2.2 Other Development Plan Documents (DPDs) in Harrow's LDF will replace the remaining saved policies in the Harrow Unitary Development Plan once adopted.

2.3 Relevant national, regional and local guidance, including supplementary planning documents and guidance, as well as planning briefs (see section 3) make up the remainder of the documents used in determining planning applications in Harrow.

General Conformity considerations

2.4 All of the Local Development Documents which the Council intends to produce must be:

- consistent with national planning policies (unless there is a robust reason for why Harrow requires any variation to those policies);
- in general conformity with the adopted Mayor's London Plan; and
- all of the DPDs and subsequent SPDs must conform with the Core Strategy.

2.5 The Council is required to identify a clear chain of conformity between documents. The Mayor will provide an opinion as to the general conformity of all Development Plan Documents with the London Plan. If his opinion is that the document is not in general conformity with the London Plan, the Mayor will make representations to this effect for the Council and the Planning Inspector, appointed to undertake the independent examination of the DPD, to consider.

3 Components of the Local Development Framework

3.1 The LDF comprises a portfolio of documents which will provide the framework for managing development and growth within Harrow to 2026 and beyond - commonly referred to as the Local Plan. For Harrow, the LDF will comprise the documents set out below. Refer to **Appendix A** for details on the timetable for producing each of these DPDs.

Development Plan Documents (DPDs)

3.2 Development Plan Documents are LDF documents that have been prepared through a formal process, which includes public consultations and an independent examination chaired by a government-appointed Inspector. The key stages of DPD preparation are set out below.

Figure 1: Key Stages of Development Plan Document Preparation

Stage	Description
Consult on sustainability appraisal scoping report	The SA scoping report sets out the sustainability objectives used to appraise the economic, social and environmental effects of the DPD. The SA scoping report is subject to consultation.
Public participation (Regulation 25)	Opportunity for interested parties and statutory consultees to consider the options for the plan before the final document is produced. Community engagement on the emerging DPD is undertaken in accordance with the regulations and the adopted Harrow Statement of Community Involvement
Pre-Submission Publication (Regulation 27)	The Council publishes the DPD which is followed with a minimum 6 week period when formal representation can be made to the DPD.
Submission (Regulation 30)	The Council submits the DPD to the Secretary of State with the representations received and Council's summary of those representations.
Examination in Public	The Planning Inspector appointed by the Secretary of State hears evidence from invited parties to inform his or hers consideration of the soundness of the DPD.
Receipt of Inspector's Report	The Council receives the Inspector's report, which which may contain minor modifications that will need to be incorporated before adoption
Adoption	The Council can formally adopt the DPD and use it for the purpose of development management.

3.3 **The Harrow Core Strategy** was adopted by the Council on the 16th February 2012, and is now part of the development plan for Harrow and as such is used to determine planning applications.

3.4 **Harrow and Wealdstone Area Action Plan** is being prepared jointly with the GLA and other partners. It sets out a comprehensive set of policies, proposals and site allocations for development within the Harrow and Wealdstone Intensification Area, which includes the town centres of Harrow and Wealdstone, the corridor between them, and the business land surrounding Wealdstone. It includes major redevelopment opportunities and supporting social and physical infrastructure, and sets out the planning framework promoting significant change, and where applicable detailed development management policies. This document has been subject to two rounds of Regulation 25 public consultations (May/June 2011) Issues and Options, and (January/ February 2012) Preferred Option.

- 3.5 West London Waste DPD.** This is a Joint Waste Development Plan Document being prepared by the six west London Boroughs of Harrow, Brent, Ealing, Hillingdon, Hounslow and Richmond, which once adopted, will form part of each Borough's LDF. The West London Waste Plan (WLWP) identifies and safeguards sufficient sites for waste management facilities in the area to deal with West London's own waste up to 2026. The Plan also contains policies against which to assess proposals for waste management facilities. The WLWP has been subject to two rounds of Regulation 25 consultations: Issues and Options (2009) and Proposed Sites and Policies (2011).
- 3.6 Site Specific Allocation DPD** sets out the allocated sites except for those set out in the Area Action Plan. It identifies the locations and sites for specific types of development in order to ensure the vision, objectives and strategy of the Core Strategy are implemented. The broad parameters for development of each site are listed covering land use and development criteria. It has been subject to one Preferred Option consultation in May/June 2011.
- 3.7 Development Management Policies DPD** contains detailed policies that planning applications for development or land use will be assessed against. The policies are generally criteria based and focus on giving effect to the strategic objectives and policies of the Core Strategy. It has been subject to one Preferred Option consultation in May/June 2011.
- 3.8 Proposals Map.** This identifies site allocations and areas of planning constraint, such as the Green Belt and other local and national environmental designations. The proposal map will be updated as new DPDs are prepared or revised so as to illustrate, graphically, the application of the policies of the DPD.

Supplementary Planning Documents (SPDs)

- 3.9** These do not have the same weight as DPDs but will be a material consideration in the determination of planning applications providing detailed guidance to support development plan policies. Supplementary planning documents (SPDs) are published for public consultation, but are not subject to independent examination. The key stages of SPD preparation are set out in **Figure 2** below:

Figure 2: Key Stages of Supplementary Planning Document Preparation

Stage	Description
Undertake and consult on strategic environmental appraisal screening opinion	SEA screening opinion in accordance with EU Directive on environmental assessment to determine whether a proposed SPD requires full appraisal. The SEA screening opinion is subject to consultation.
Publish draft SPD for consultation (Regulation 17)	Representations invited on a draft SPD, in accordance with the regulations and the adopted Harrow Statement of Community Involvement.
Adoption	The Council makes necessary amendments to the SPD to take account of comments made and adopts the SPD for use as material consideration.

- 3.10** The Council has already adopted a number of SPDs, which are available at <http://www.harrow.gov.uk/ldf>, and is in the process of preparing the following additional SPDs:

- Stanmore and Edgware Conservation Area SPD

- Harrow Weald Conservation Area SPD
- Affordable Housing and Planning Obligations SPDs

3.11 The timetable for preparing these SPDs is provided on the relevant pages on the Council's website.

3.12 In addition to SPDs, the Council may choose to prepare Planning Briefs setting out the planning policies and constraints applying to a particular site to guide potential developers. It is likely that once the key DPDs are adopted existing SPDs and Planning Briefs may need to be reviewed and updated to better fit with the new planning policies.

Evidence Base

3.13 In order to carry out the preparation of the LDF, the Council will develop and maintain a sound evidence base. Necessary research has already been conducted, and will be supplemented by research undertaken by partners, other organisations, and the community. Providing a sound and comprehensive evidence base is fundamental to developing sound planning documents. **Appendix B** outlines the key evidence base documents considered necessary to inform the LDF.

Statement of Community Involvement (SCI)

3.14 The Harrow SCI was adopted in August 2006 and is available on the Council website at http://www.harrow.gov.uk/site/scripts/download_info.php?fileID=2368. The SCI details how the community and stakeholders will be involved in the preparation, alteration and review of all LDDs, as well as the consideration of minor and major planning applications. The SCI is not a DPD, but was subject to public examination. To ensure the SCI remains relevant and has regard to new methods of engagement, the SCI will be subject to review and updating as necessary.

Authorities Monitoring Report (AMR)

3.15 The AMR is published yearly and assesses:

- The state of the Borough's environment, identifying development trends, patterns of land-use, as well as transport and population/ socio-economic trends in order to provide a 'baseline' for sustainability appraisal, the identification of issues or problems and the context reviewing development plan policies or policy omissions;
- The implementation of the Local Development Scheme and whether revisions to the scheme are necessary;
- The extent to which the development plan objectives and policies are being achieved; and
- Development management performance.

3.16 Harrow's Annual Monitoring Reports are available on the Council's website at http://www.harrow.gov.uk/info/856/local_development_framework_policy/1922/annual_monitoring.

Sustainable Appraisal (SA)& Strategic Environmental Assessment (SEA)

3.17 Sustainability Appraisal (SA) is required for all DPDs. It is an integral component of all stages of plan preparation. The purpose of a SA is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. The SA embraces economic, environmental and social objectives, and therefore has a wider scope than Strategic Environmental Assessment (SEA), which is required by EU Directive (2001/42/EC) and only concentrates on environmental effects.

3.18 An SA/SEA is undertaken in 4 key stages:

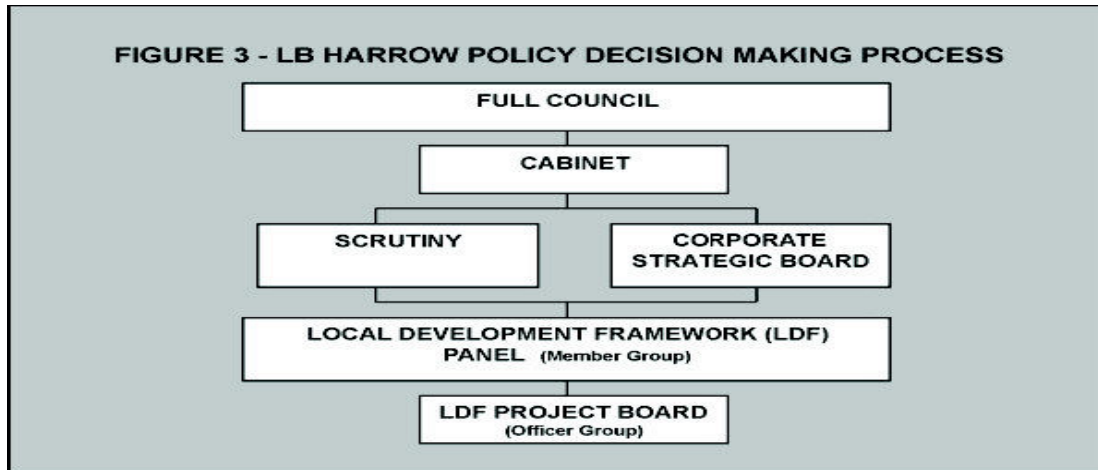
- Stage A, Scoping report - published at the pre-production stage;
- Stage B, Interim Sustainability Appraisal - published at the Issues and Options stage;
- Stage C, Interim Sustainability Appraisal - published at the Preferred Options stage;
- Stage D, Final Environmental Report published at the Pre-Submission stage.

3.19 Work on producing a DPD cannot proceed without corresponding work on the SA/SEA. Therefore, each DPD produced within the Council's LDF will be supported by an SA. Both the draft documents and the SA will be made publicly available for consultation at the same time and comments invited on both. The findings of the SA in informing each DPD will be a material consideration in determining soundness of the documents at the examination in public.

4 Managing the LDF Process

Governance

4.1 The effective implementation of this LDS will require the consideration of the most effective governance support procedures. According to the Council's constitution, full Council approval is required prior to any consultation or submission of a DPD. Harrow Council operates a Cabinet Structure (refer to **Figure 3** for structure diagram). Prior to documents being agreed by full Council, a DPD must first be report to the Local Development Framework Panel (Member panel), before being recommended to Cabinet and ultimately full Council. The Local Development Framework Panel is charged with overseeing the preparation and implementation of the LDS and making recommendations to the Cabinet.



- 4.2** On occasion the Council's Overview and Scrutiny Committee may 'call in' decisions from the Local Development Framework Panel, prior to being considered by Cabinet. The Overview and Scrutiny Committee is charged with ensuring the Council is accountable for its decisions processes.
- 4.3** The timeframe necessary to comply with the Council's in house processes and procedures has been included within timeline given for each DPD, although where necessary this will include special committee meetings.

Staff and Resource Allocated to the Local Development Framework

- 4.4** The LDF Team will take the lead on preparing all LDF documents. This includes the DPDs and most SPDs but also the SA/SEA, thematic studies, and the preparation of evidence base studies to support the LDF.
- 4.5** The LDF Team will be supported where necessary by the Development Management, the Design & Conservation, and the Economic Development, Enterprise & Research teams. It will also be necessary to use consultants on various elements of the LDF.
- 4.6** Overall management responsibility for the LDF will be with the Divisional Director of Planning. It will be the responsibility of the Divisional Director to allocate sufficient staff from within the Planning Service and to negotiate for corporate staff resources where necessary.

Monitoring and Review

- 4.7** The LDS will be subject to both annual and in-year monitoring to ensure the timetables outlined are being met. Where this indicates otherwise, the LDF team will analyse the reasons for this and determine whether actions can be taken to bring the DPD back into line with the programme. Where the analysis highlights significant variance that cannot be overcome, the LDS will need to be revised accordingly to ensure it remains up to date.

Appendix A Harrow LDF Programme Timetable

DEVELOPMENT PLAN DOCUMENTS

DEVELOPMENT MANAGEMENT POLICIES DPD

Document Profile	
Role and Subject	To provide criteria-based policies to assess applications for new development and change of use, ensuring that any future development meets the vision and strategic objectives of the Core Strategy and relevant national and regional policy.
Geographic Coverage	Borough wide
Status (e.g. DPD, SPD etc)	DPD
Chain of Conformity	National Planning Policy (NPPF) London Plan consolidated with amendments (2011) Harrow's Core Strategy
UDP Replacement	The Development Management Policies DPD will replace the remaining Part 2 policies of the existing UDP.
Key Milestones	
Consulting on the scope of the Sustainability Appraisal	July 2010
Regulation 25: Public participation in the preparation of the DPD	May/June 2011
Regulation 27: Pre-Submission publication (minimum six week period for representations)	July 2012
Regulation 30: Submission of DPD and representations to Secretary of State	September 2012
Pre-Examination Meeting	October 2012
Independent Examination	December 2012
Receive Inspector's Report (fact check)	February 2013
Receive Inspector's binding report	February 2013
Adoption	April 2013

Development Management Policies Timetable																																															
2010												2011												2012												2013											
J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A								
					C												D	D																		P	P	S	I	E				A			
D = Draft Preferred Option P = PreSubmission S = Submission																																															
I = Pre-Examination Meeting E= Examination in Public A = Adoption																																															

HARROW AND WEALDSTONE AREA ACTION PLAN DPD

Document Profile	
Role and Subject	The Area Action Plan sets out a comprehensive set of policies and proposals for development in the Harrow and Wealdstone Intensification Area (H&WIA). It includes major redevelopment opportunities and physical and social infrastructure changes. It also sets out the planning framework for significant change to be managed through detailed development management policies.
Geographic Coverage	The area designated by the Harrow and Wealdstone Intensification Area
Status (e.g. DPD, SPD etc)	Joint DPD
Chain of Conformity	National Planning Policy (NPPF) London Plan consolidated with amendments (2011) Harrow's Core Strategy
UDP Replacement	The AAP will replace the Part 2 UDP policies and proposal sites, as they relate to the area of the H&WIA.
Key Milestones	
Consulting on the scope of the Sustainability Appraisal	July 2010
Regulation 25: Public participation in the preparation of the DPD	Issues and Options: May/June 2011 Preferred Option: January/February 2012
Regulation 27: Pre-Submission publication (minimum six week period for representations)	July 2012
Regulation 30: Submission of DPD and representations to Secretary of State	September 2012
Pre-Examination Meeting	October 2012
Independent Examination	December 2012
Receive Inspector's Report (fact check)	February 2013
Receive Inspector's binding report	February 2013
Adoption	April 2013

Harrow and Wealdstone Area Action Plan DPD Timetable																																																														
2010												2011												2012												2013																										
J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A																							
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D = Draft Preferred Option P = PreSubmission S = Submission																																																														
I = Pre-Examination Meeting E= Examination in Public A = Adoption																																																														

PROPOSAL MAP

Document Profile	
Role and Subject	To provide visual illustration of the policies contained in the Local Plan, which will include adopted LDF policies as well as extant and 'saved' UDP policies, until such time as the latter is replaced by emerging LDF policies.
Geographic Coverage	Borough wide but will also contain insert maps, where appropriate, for specific areas of the Borough
Status (e.g. DPD, SPD etc)	DDP
Chain of Conformity	National Planning Policy (NPPF) London Plan consolidated with amendments (2011) Harrow Core Strategy Other Development Plan Documents

COMPLETED LDF DOCUMENTS

Document	Purpose and Content
Core Strategy Development Plan Document (2012)	The Core Strategy sets the objectives, spatial vision, and strategic policies to manage development in the Borough to 2026. All other DPDs must be in conformity with its objectives.
Access for All SPD (April 2006)	This SPD guides designers and developers to create an environment that promotes easy to access buildings, facilities and surroundings. This SPD applies to the whole borough of Harrow and provides detailed design advice and illustrations on how to achieve greater accessibility.
The Statement of Community Involvement (August 2006)	Sets out the standards and the different approaches the Council will adhere to when undertaking community engagement on DPDs and SPD, and in the consideration of major and minor planning applications.
RAF Bentley Priory Conservation Area SPD (October 2007)	Provides guidelines for the development of listed buildings and adjacent land on the RAF Bentley Priory site, formerly a Ministry of Defence site. The MOD released this site in 2008. The SPD provides guidelines for development based on the sites status under the UDP as a Major Developed Site in the Green Belt and including advice on the future of the Grade II* listed Priory building and the Listed Park and Garden
Harrow on the Hill Conservation Area SPD (May 2008)	This SPD replaced the existing SPGs for the following conservation locations - Harrow on the Hill Village, Harrow Park, Mount Park Estate, Roxborough Park & The Grove, South Hill Avenue, Sudbury Hill and Harrow School.
Sustainable Building Design SPD (May 2009)	To provide guidance on how to integrate environmental sustainable initiatives within new and existing development. This document introduces a sustainability checklist for inclusion within the validations process for planning applications.
Pinner Conservation Area SPD (December 2009)	To detail an area appraisal and management plan for the following conservation locations within the wider Pinner conservation Area. This document will apply to the following Pinner conservation area locations - Pinner High Street, Tookes Green, Waxwell Lane, East End Farm, Moss Lane, Pinnerwood Park Estate, Pinner Hill Estate, Waxwell Close, Eastcote Village, West Towers, Pinnerwood Farm and Rayners Lane.
Accessible Homes SPD (March 2010)	To provide guidance on how to make housing more accessible through design, within the borough.
Residential Design Guide SPD (December 2010)	To provide guidance on acceptable forms of residential design, including extensions and conversions.

Appendix B Harrow LDF Evidence Base

The following sets out the main baseline documents prepared to support and inform the LDF and, in particular, the Core Strategy. It should be noted that the list does not include all relevant documents that may be relied upon to inform LDF policy, such as national and regional strategies and guidance, or the Council's strategies for Green Belt Management, Biodiversity, Climate Change etc. A comprehensive list of all studies and relevant documentation will be prepared prior to pre-submission of any DPD. As each of the evidence base studies are completed, these are made available to view on the Council's website <http://www.harrow.gov.uk/ldf>

Key Evidence Base Studies

Topic	Status	Commentary
Housing and Demographics		
Housing Needs Assessment	Completed in 2006	Study focuses on the requirement/need for affordable housing, taking account of existing backlog and projected future needs, including tenure type and house size. Further studies currently underway by Housing Dept regarding adult care housing.
GLA Housing Capacity Study - Strategic Housing Land Availability Assessment	Published in October 2009	Lead by the GLA, with the support of all boroughs, considers the availability and residential capacity of strategic sites as well as past completions performance to derive an overall strategic requirement. The baseline figures were signed-off by the Council in August 2009, subject to borough-level viability testing. Final Report was published by the GLA in October 2009.
Strategic Housing Market Assessment	Completed in August 2010	Joint study being prepared by ORS on behalf of the six west London borough's regarding market trends, movements and housing demand. This has been the subject of slippage due to the need to get agreement of the six LPAs to the emerging figures.
Harrow Vitality Profiles 2009/2010	Completed in May 2010	Updates the 2006 Vitality Profiles, providing a range of facts and figures at the lower Super Output Area level, which builds up a picture of Harrow - its people and the environment.
Development Appraisals and Viability Testing	Completed March 2011	This study provides a general understanding of the ability of development to meet proposed policy requirements, including affordable housing and other contributions, and remain viable.
Retail and Employment		
Retail Study	Completed in March 2006	Donaldsons undertook retail study in 2005/2006. However, by late 2008 - early 2009, the findings of this study were considered to inconsistent with likely projections following the recession.
Employment Land Study	Completed in November 2006	Undertaken by URS and GVA Grimley. Study was completed and signed off but was done undertaken in a buoyant market so the findings of the study were, by late 2008 early 2009, considered to inconsistent with likely projections following the recession.
Retail Study Review and Update	Completed in September 2009	Nathaniel Lichfield undertook to peer review the 2006 Retail Study and determined a new full retail study was warranted, which was undertaken by them and completed in September 2009.
Employment Land Review	Completed in August 2010	Undertaken by Nathaniel Lichfield which included a stage 1 peer review of the strengths and weaknesses of the original study, and where further work is required and a full review as part of stage 2.
Local Economic Assessment	Completed in December 2010	The assessment provides a clear narrative about Harrow and its current economic position. The document will describe the economic opportunities, issues and challenges facing Harrow now and over the coming decades.
Environment, Leisure and Culture		
Sports, Recreation and Open Spaces Study	Completed in March 2005	Undertaken by Strategic Leisure on behalf of the Council. A peer review of the study highlighted several weaknesses that questioned the robustness of the findings.
Sport/Leisure Assessment	Completed in January 2009	Facilities Modelling via Edinburgh University undertaken by Sport England and Genesis in November 2008, dealing with swimming pools and sports halls only.

Topic	Status	Commentary
Strategic Flood Risk Assessment Level 1	Completed in June 2009	This was carried out by the consultants MWH in 2008/09 and was subject to consultation with the Environment Agency. The final report was published in June 2009.
Open Space, Sports and Recreation Study Review	Completed in August 2010	Ashley Godfrey and Associates undertook to peer review the 2005 PPG17 Study and determined a new study was warranted, which was undertaken by them and completed in May 2010.
Strategic Flood Risk Assessment Level 2	Completed in September 2010	MWH, in consultation with the Environment Agency were commissioned to undertake the SRFA Level 2 focusing primarily on flooding risk within Wealdstone town centre, given its role in the delivery of the Intensification Area.
Views Assessment	Completed in 2012	An assessment of Harrow's strategic views, including policy recommendations and introducing protected viewing corridors.
Character Study	Completed in February 2011	Survey of neighbourhood character including housing types/styles and SWOT analysis of each area. This work was done in-house
Transport and Infrastructure		
Transport Audit	Completed in August 2010	An assessment undertaken by consultants Mouchell to consider the growth implications on existing public and private transport across the Borough.
Infrastructure Assessment and Delivery Plan	Completed in March 2011	This is a living document - updated as necessary to reflect the Council's priorities and partner organisations delivery of infrastructure to match growth - the document includes an infrastructure schedule that will inform CIL
Local Implementation Plan	Completed in 2011	This document is completed in house by the Transport Planning team, and identifies future transport projects to be delivered, and priority areas for transport improvements.

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West London Waste Plan

DRAFT Proposed Submission Version

11th November 2011

Produced for
London Borough of Hillingdon

Prepared by
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Distribution

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Executive Summary

1. For some time, both the European and UK Governments have been concerned that we are sending too much of our waste for incineration or to landfill – not enough is being recycled and re-used.
2. Consequently, the Government now requires every local authority to produce a plan which details how it will deal with waste generated in its area over the next 15 years. These plans make up a part of the authority's Local Development Framework and show which factors they will take into account when deciding on whether to grant planning permissions for new waste facilities.
3. In London, the Mayor has set out in the London Plan (2011) projections of how much municipal waste and commercial and industrial waste is likely to be generated in the capital over the next 20 years. Each borough is then allocated an apportionment of that waste that it is required to actively plan for managing and has to ensure that sufficient sites are identified to meet the apportionment targets. By meeting the apportionment London will dramatically improve its reliance on landfill and move towards being self-sufficient.
4. In west London, six London boroughs have agreed to co-operate to produce a single waste plan for their combined area. When finalised, this plan will form part of each of their respective Local Development Frameworks. The West London Waste Plan details the amount for the different types of waste expected to be produced in west London up to 2026; identifies the current sites available to help deal with that waste; identifies the current shortfall of facilities needed, and proposes a set of further sites which might be used for waste facilities in the future.
5. The West London Waste Plan has been prepared with the objective of ensuring compliance with the waste apportioned to the six boroughs as detailed in the London Plan (2011).
6. The report comprises six sections, covering:
 - i. An introduction to the West London Waste Plan;
 - ii. The Vision and Objectives of the Plan;
 - iii. An explanation of what will be needed in the future to manage waste;
 - iv. Details of the Proposed Sites for future waste management use;
 - v. Policies to guide the determination of planning applications for new waste facilities, and
 - vi. A short explanation of how the Plan will be monitored in future.

7. The existing sites and proposed sites are:

Table i: The proposed sites allocated for redevelopment

Site Number	Site Area (ha)	Borough	Description	Site Type
352	1.46	Brent	Twyford Waste Transfer Station	Existing
1261	2.71	Brent	Veolia Transfer Station, Marsh Road	Existing
309	1.15	Ealing	Greenford Reuse & Recycling Site,	Existing
310	0.94	Ealing	Greenford Depot, Greenford Road,	Existing
328	2.10	Ealing	Quattro, Victoria Road, Park Royal	Existing
303	4.25	Hillingdon	Victoria Road Transfer Station	Existing
353	3.11	Hounslow	Transport Avenue Waste Transfer Station	Existing
342	3.67	Richmond	Twickenham Depot	Existing
222	2.83	Harrow	Council depot, Forward Drive	Proposed
244	3.12	Hillingdon	Yeading Brook, Bulls Bridge	Proposed
2861	3.20	Hounslow	Western International Market	Proposed

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1 The West London Waste Plan

1.1 Preparation of the Plan

- 1.1.1 The West London Waste Plan is being prepared jointly by the six west London boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. The area covered by the plan, and how it is split into its constituent boroughs is shown in Figure 1-1.

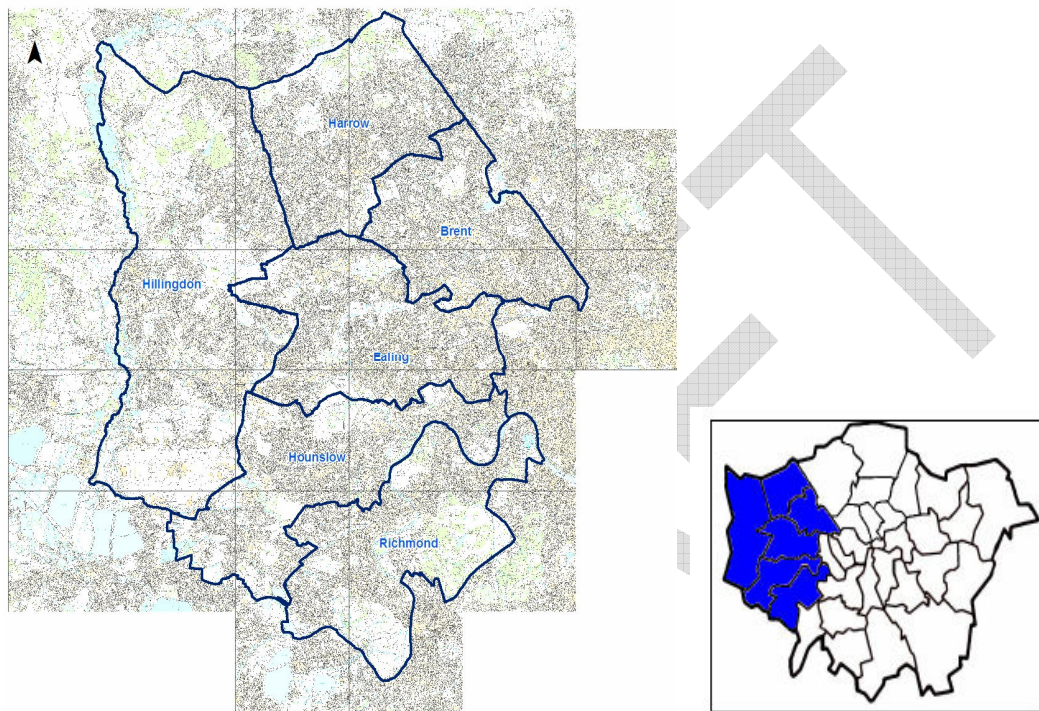


Figure 1-1: West London boroughs

1.2 Why Is The West London Waste Plan Needed?

- 1.2.1 The West London Waste Plan (the Plan) will provide a planning framework for the management of all waste produced in the six boroughs over the next 15 years. It is needed to comply with the Mayor's London Plan (2011), which sets out targets for recycling and composting for waste from households, businesses and industry. The London Plan (2011) also requires that the majority of waste generated in London is managed in London, so that the Capital moves towards waste self-sufficiency by 2031.
- 1.2.2 Currently, a significant amount of waste is transferred outside of London for treatment or disposal in landfill. Table 1-1 shows the London Plan (2011) targets for the proportion of waste to be managed within London for various target years. Overall, the target states that the aim is to manage the equivalent of 100 per cent of London's waste within London by 2031.

Table 1-1: Self-Sufficiency targets for London

Waste stream	2015	2020	2031
Municipal Solid Waste	45%	50%	60%
Commercial & Industrial Waste		70%	
Construction, Demolition & Excavation		95%	
All wastes			100%

- 1.2.3 Under the Planning and Compulsory Purchase Act 2004, London boroughs are required to replace their existing Land Use Plans (called Unitary Development Plans) with Local Development Frameworks. Local Development Frameworks comprise a number of planning documents and must contain both specific policies for waste and sites identified for waste use. These planning documents must be in general conformity with the London Plan; the Mayor of London's planning strategy for the capital, in addition to national planning policy. Before the Plan can be adopted it will be independently tested through a public examination to ensure it meets all of the key tests for a sound plan.
- 1.2.4 The Plan will outline the proposed sites for waste management development in the plan area and provide a set of policies with which waste developments must conform. The Plan will cover the London Plan (2011) apportionment targets outlining the amount of waste from households, business and industry required to be managed in the west London area up to 2026. The timetable for the production of the Plan and for its final adoption is shown in Table 1-2.

Table 1-2: Timetable for the development of the West London Waste Plan

Period	Stage of development
January - March 2009	Issues and Options Consultation
February - March 2011	Draft Plan Consultation
January - February 2012	Representations on Proposed Submission Version
January 2013	Examination of the Plan
May 2013	Adoption of the Plan by the west London boroughs

1.3 Relationship with Other Planning Strategies and the Plan's Status

- 1.3.1 The Plan is influenced by, and has to give consideration to, relevant national, regional and local policy in relation to waste development (both adopted and emerging).
- 1.3.2 This Plan will be adopted, after Examination in Public and consideration of the appointed Inspector's report, by each of the constituent boroughs. It will take on the status of a statutory Development Plan Document, and its policies will be accorded considerable weight by each local planning authority and the Secretary of State in determining planning applications for waste management facilities within the plan area.

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European Legislation

- 1.3.3 The Waste Framework Directive [2008/98/EC, which has been implemented by the Waste England and Wales Regulation 2011,]¹ is the principal EU legislation for waste, and requires that measures be put in place to ensure that waste is recovered or disposed of without endangering human health or causing harm to the environment. A key principle of the directive is the waste hierarchy, with the objective to manage waste as near to the top of the hierarchy as possible.

National Policy

- 1.3.4 National policy relevant to waste development is outlined in the UK Sustainable Development Strategy² which sets out the national policy approach to ensuring sustainable development. The Waste Strategy for England 2007³ was published following a comprehensive review of Waste Strategy 2000. The key objectives of these documents are to:
- Decouple waste growth from economic growth and put more emphasis on waste prevention and re-use;
 - Increase diversion of municipal and non-municipal waste from landfill;
 - Secure investment in waste infrastructure; and
 - Get the most environmental benefit from the investment through increased recycling of resources and recovery of energy from residual waste.

The Waste Strategy for England (2007) also sets national targets for recycling and composting of household waste and the recovery of municipal waste.

- 1.3.5 Planning Policy Statement 10: Planning for Waste Development⁴ outlines the key objectives and considerations when producing planning policies for waste development and the consideration of relevant applications for development.

¹ *Waste Framework Directive (Directive 2008/98/EC* - <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32008L0098:EN:NOT>

² *The UK Government Sustainable Development Strategy* - <http://www.defra.gov.uk/publications/files/pb10589-securing-the-future-050307.pdf>

³ *Waste Strategy for England 2007* - <http://archive.defra.gov.uk/environment/waste/strategy/strategy07/documents/waste07-strategy.pdf>

⁴ *Planning Policy Statement 10* - <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1876202.pdf>

Regional Policy

- 1.3.6 The London Plan (2011) provides the regional planning framework for the six west London boroughs jointly preparing the Plan and outlines the principal guidelines for waste development. The Government has agreed that, although regional strategies for other parts of England will be abolished, the London Plan will continue to provide strategic guidance within the capital and thus be accorded significant weight in guiding the evolution of development plans and in determining planning applications.
- 1.3.7 Boroughs must be in general conformity with the relevant waste management policies in the London Plan (2011). This includes an apportionment of the tonnages of municipal and commercial and industrial waste to be managed by each London borough; revised targets for recycling of municipal waste; and new targets for recycling of commercial and industrial waste and recycling or reuse of construction and demolition waste.
- 1.3.8 Each of the six west London boroughs is preparing a number of other strategies and plans which, along with the Plan, will form its Local Development Framework (LDF).
- 1.3.9 Each borough must produce Development Plan Documents (DPDs) which make up their LDF. The main DPD is the Core Strategy which sets out the general spatial vision and objectives for delivery of the LDF. It also helps the borough to deliver its Community Strategy and must reflect the regional strategy, which is set out in the London Plan.
- 1.3.10 The Plan is a DPD (see 1.3.2) and, although being prepared jointly by the six west London boroughs, must be aligned with their individual Core Strategies and adopted development plans.

1.4 Sustainability Appraisal

- 1.4.1 The Plan has been subjected to a Sustainability Appraisal (SA) during the course of its development. An SA ensures that planning documents accord with the principles defined in the Government's UK Sustainable Development agenda⁵. The timing of the SA aims to ensure that sustainability considerations are taken into account early in the process of policy development. A Habitats Regulations Assessment (HRA); an Equalities Impact Assessment (EqIA); and a Strategic Flood Risk Assessment (SFRA) have also been undertaken in conjunction with the development of this Plan. Appendix 1 provides details on the process for each of these assessments.

⁵ Defra Sustainable Development Unit - <http://www.sustainable-development.gov.uk/publications/uk-strategy/framework-for-sd.htm>

1.5 Community and Stakeholder Consultation

- 1.5.1 The West London Waste Plan has been informed by consultation with statutory bodies, local organisations, key stakeholders and the wider community throughout its preparation. This has been carried out in accordance with each borough's "Statement of Community Involvement".
- 1.5.2 Initial consultation took place in January and February 2009 on the key issues which the West London Waste Plan needs to address, as set out in the West London Waste Plan Issues and Options report⁶. A wide range of responses was received via the various public workshops and meetings held across the six boroughs, via the project website and in writing. The boroughs' preferred approach to deal with the issues raised, as well as a list of the proposed sites, was published for comment in February 2011 in the Proposed Sites and Policies report. Staffed drop-in sessions in each of the six boroughs were attended by over 120 people along with 64 people attending further meetings. In addition to responses received at these events, 248 questionnaires were completed, and a further 133 additional written and email submissions were made alongside two petitions containing 2,399 signatures. A full report on this consultation is available on the West London Waste Plan website (www.wlwp.net).

1.6 Commenting on the Plan

- 1.6.1 You can make representations on this proposed submission draft of the West London Waste Plan, including the Sustainability Appraisal and Equalities Impact Assessment during a six week period commencing from the 19 January 2012.
- 1.6.2 All representations made will be considered by a Planning Inspector at a formal process called an examination in public. The purpose of the examination is to consider whether the Waste Plan complies with the legal requirements and is 'sound'.
- 1.6.3 Since the Planning Inspector's role is to answer these questions, any comments on the Plan will need to be related to legal compliance and "soundness".

⁶ *West London Waste Plan Issues and Options Report (February 2009) available to download from <http://www.wlwp.net/documents.html>*

1.6.4 In summary, comments on the “soundness” of the Plan need to address the following issues:

- Is it ‘justified’? This means that the document must be:
 - founded on a robust and credible evidence base
 - the most appropriate strategy when considered against the reasonable alternatives
- Is it ‘effective’? This means that the document must be:
 - deliverable
 - Flexible, so that the local authorities can adapt the plan to respond to unexpected changes in circumstances
 - able to be monitored against clear, and measurable criteria
- Is it consistent with national policy?

1.6.5 More guidance on the meaning of these terms will be included with the comments form. Other guidance is available from the Planning Inspectorate⁷ and in Planning Policy Statement 12 which outlines the requirements for Core Strategies⁸.

1.6.6 All responses must be received by 1 March 2012. All representations and other material in support of any comments made should be sent to:

CAG Consultants
West London Waste Plan Consultation
Gordon House, 6 Lissenden Gardens, London, NW5 1LX
Email: consultation@wlwp.net

1.6.7 Comments can also be given via the website:

www.wlwp.net

⁷ See: http://www.planningportal.gov.uk/uploads/pins/dpd_brief_guide_examining.pdf

⁸ The Waste Plan is a joint Core Strategy for waste. PPS12 outlines the requirements for Core Strategies in section 4:
<http://www.communities.gov.uk/publications/planningandbuilding/pps12/sp>

1.6.8 The West London Waste Plan Proposed Submission document and an accompanying Technical Report, Sustainability Appraisal and Equalities Impact Assessment are available for download via the West London Waste Plan website at: www.wlwp.net. Hard copies are also available to view at:

1. All Libraries across the six boroughs; and
2. Local Council Offices across the six boroughs.

1.6.9 The west London authorities will seek to ensure that all reports are accessible to everyone and will offer assistance to those who are blind or partially sighted or do not speak English fluently. This may include spoken or written translation in different languages, Braille, audio or large print format.

1.6.10 The representations made on the West London Waste Plan will be forwarded to the Planning Inspector.

1.6.11 There will be an independent Examination in Public of the West London Waste Plan which will start upon its submission to the Secretary of State in September 2012 and culminate in a hearing before an independent Planning Inspector in January 2013. Following the Examination, the Inspector will issue a binding report. Following ratification of the Inspector's report by each borough, the West London Waste Plan will be formally adopted by each borough in May 2013.

1.7 Planning applications for waste management facilities

1.7.1 The Plan and its policies will be the primary material consideration when assessing planning applications for new waste management facilities in the west London boroughs. After this Plan has been adopted, developers should first use the West London Waste Plan to identify a suitable site when considering the development of a potential new waste management facility. If the developer cannot find a suitable site in the Plan, any alternative site proposed will have to conform to the policies within the Plan. Developers should also consider requirements and policies within the following documents before submitting a planning application for a waste management facility in west London:

- Any national statutory guidance, e.g. Planning Policy Statement 10;
- Borough Development Plan Documents;
- London Plan;
- Mayor of London Order (2008); and
- Supplementary Planning Guidance from the Mayor or Supplementary Planning Documents from the relevant borough.

1.8 West London Waste Authority

- 1.8.1 The West London Waste Authority (WLWA) is the statutory Waste Disposal Authority for the six west London boroughs and as such is solely responsible for the transport, treatment and disposal of municipal waste collected by the boroughs.
- 1.8.2 The WLWA and its constituent boroughs consulted on and subsequently adopted a Joint Municipal Waste Management Strategy⁹ in 2005. It sets out the future waste and recycling plans and targets for the Authority and each of the six boroughs. An Addendum followed in 2009, providing an update on the Authority's Partnership waste management performance.
- 1.8.3 The WLWA has a vision of achieving a 70% reuse/recycling/recovery rate and zero waste to landfill although there is no timescale for these targets.
- 1.8.4 In 2008/09 the WLWA and its constituent boroughs dealt with a total of 767,000 tonnes of municipal waste, including abandoned vehicles. Of this total some 176,000 tonnes was recycled, 84,000 tonnes was composted, and the remaining 507,000 tonnes was sent for disposal, nearly all by rail from the WLWA's transfer stations in Brentford and South Ruislip, to landfill sites in Oxfordshire and Buckinghamshire.
- 1.8.5 From 2009/10 increasing quantities of waste not recycled or composted will be diverted from landfill. The WLWA has a contract to send waste to the Lakeside Energy from Waste plant near Slough, for the next 25 years. This contract started in 2009/10 with an annual tonnage of 25,000 tonnes. It remains at this level until 2014/15 when for one year the tonnage increases to 45,000 tonnes. The following year (2015/16) the tonnage increases to 90,000 tonnes and remains at that level until the final year of the contract in 2034/35.

1.9 Cross boundary movement of waste

- 1.9.1 Whilst waste is both generated and treated within west London boroughs, there is still the transfer of waste both into the WLWA area as well as exported out of it for treatment in other areas. It is important to assess the level of this cross boundary movement of waste and to identify potential implications this may cause to the West London Waste Plan during the Plan period.
- 1.9.2 The WLWA and its constituent boroughs exported 995,900 tonnes of waste out of west London for landfill disposal in 2008. The majority of this waste was sent to Buckinghamshire (28%) and Bedfordshire (24%), followed by Oxfordshire (12%), with the remaining 36% divided between eight other authorities.

⁹ WLWA Draft Joint Municipal Waste Management Strategy, September 2005 - <http://www.westlondonwaste.gov.uk/west-london-waste-authority/strategy/>

1.9.3 The relevant authorities to whom this waste was exported have adopted waste plans which have identified sufficient sites to accommodate the declining levels of waste that will be exported from London for the period of this Plan, which is until 2026.

1.9.4 As such, it is considered with the implementation of the policies in this Plan which are designed to help achieve the London Plan (2011) aim of 100% of waste produced in London being managed in London by 2031, and the move towards providing energy production from waste sites, that there will be no overriding issues with regards to the impact of any cross boundary movement of waste.

1.10 Waste Minimisation

1.10.1 The west London boroughs are committed to waste reduction and minimisation initiatives and understand the importance of such issues to the residents of west London and to the success of sustainable waste management in the area. Although the Plan cannot directly enforce waste reduction, it will encourage waste minimisation through appropriate policies.

1.10.2 The West London Waste Plan supports the management of waste according to the waste hierarchy (Figure 1-2) as identified in the Waste Strategy for England¹⁰ and the London Plan (2011).

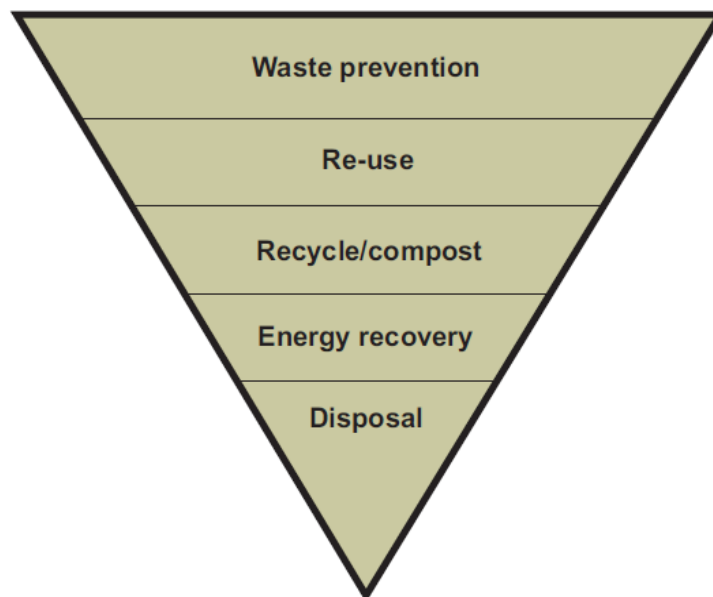


Figure 1-2: The Waste Hierarchy

¹⁰ Waste Strategy for England (2007), Department for Environment, Food and Rural Affairs (DEFRA) www.defra.gov.uk

Each of the six boroughs is already dealing with wider waste issues such as encouraging waste minimisation and increasing recycling in accordance with the waste hierarchy. The waste hierarchy states that we should first try to reduce and re-use waste, then recycle waste into useful materials and, if this is not possible, recover energy from waste before considering the safe disposal of waste as a last resort. All boroughs operate household waste recycling collections, reuse and recycling centres and offer information on waste minimisation activities such as home composting or using re-usable nappies.

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2 Vision and Objectives of the Plan

2.1 Vision

- 2.1.1 The unique characteristics of west London, as well as the key challenges and opportunities that have been identified in developing the Plan, have fed into the vision of the Plan, which is supported by its aims and objectives.
- 2.1.2 The vision of the Plan ensures that the long-term management of waste in west London will allow for the best possible outcomes for the west London boroughs. It brings together national, regional and local guidance along with the views of key stakeholders and the evidence base that underlies the Plan.

West London Waste Plan Vision

By 2026, the West London Waste Plan area will have made provision for enough waste management facilities in the right locations to provide for the sustainable management of waste. It will seek to do so whilst protecting the environment, stimulating the economy and balancing the needs of west London's communities.

2.2 Strategic Objectives

- 2.2.1 The West London Waste Plan strategic objectives were developed in response to the key issues for west London and responses received through community consultation.

West London Waste Plan Strategic Objectives

1. To identify sufficient land for the management of the six boroughs' pooled waste apportionment as set out in the London Plan, including safeguarding existing waste sites and maximising their use as waste management sites.
2. To ensure that waste is managed as far up the waste hierarchy as possible, by encouraging the minimisation of waste and the use of waste as a resource.
3. To reduce the impact of waste management on climate change by encouraging the use of sustainable transport and new, clean technologies, whilst seeking to locate waste management facilities as close to waste sources as practicable.
4. To ensure that, through appropriate policies, waste facilities meet the highest standards possible of design, construction and operation to minimise adverse effects on local communities and the environment.
5. To support the key aims and objectives of Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond's Sustainable Community Strategies.

3 Existing waste management and future waste management needs

3.1 Existing waste management

3.1.1 West London produces, and is expected to continue to produce, a significant quantity of waste. This section looks at the different types of waste being generated in west London and how it is currently being managed, along with future trends allowing for the west London boroughs to determine what infrastructure is required to meet the London Plan (2011) waste apportionment figures.

3.2 Municipal solid waste

3.2.1 Municipal Solid Waste (MSW) in the west London boroughs is managed by the WLWA and includes household waste, kerbside collected recyclables, green waste and waste and recyclables collected at household waste and recycling centres.

3.2.2 Overall in 2009/10 the WLWA and its constituent boroughs managed approximately 693,000 tonnes of MSW. Of this total, 41% was reused, recycled or composted, with the remaining 59% sent for disposal, nearly all to landfill outside west London. This figure for landfill compares favourably with previous years (Table 3-1), both in terms of the total tonnage sent to landfill and the percentage of the total MSW stream this represents. Figure 3 shows the means of waste management in the plan area in 2009/10, the latest full year for which figures are available.

Table 3-1: WLWA management of MSW (2006-2010)

Waste (tonnes)	2006/07	%	2007/08	%	2008/09	%	2009/10	%
Recycling & Reuse	116,000	14.6	131,000	16.9	139,000	19.0	155,000	22.4
Composting	62,000	7.8	71,000	9.2	84,000	11.5	86,000	12.4
Energy Recovery	3,000	0.4	3,000	0.4	1,000	0.1	12,000	1.7
Landfill	603,000	75.8	555,000	71.8	485,000	66.2	395,000	57.0
Materials Recovery Facility	13,000	1.6	13,000	1.7	25,000	3.4	45,000	6.5
Total waste	796,000		773,000		733,000		693,000	

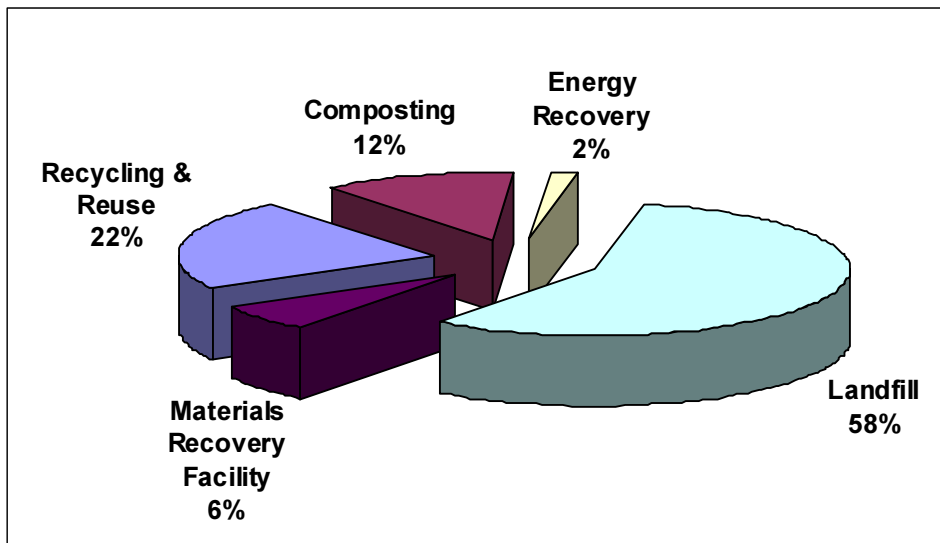


Figure 3-1 - West London Waste Authority MSW management (2009/10)

3.2.3 As the statutory body responsible for managing MSW generated in the west London boroughs, the WLWA is in the process of procuring a new long term contract for the management of this waste. The main objective of the procurement is to eliminate (or significantly reduce) the landfilling of municipal waste. The WLWA has been working in partnership with its constituent boroughs and has produced a Procurement Strategy¹¹. The procurement is outcome-based, with targets for landfill diversion, affordability, recycling and carbon impact and has no preference on the technology to be used.

3.2.4 The WLWA, following consultation with the GLA, issued an Official Journal of the European Union (OJEU) notice on 16th May 2011 to commence the procurement process of the treatment of up to 300,000 tonnes of municipal waste per year.

3.3 Commercial and Industrial Waste

3.3.1 Historically, Commercial and Industrial Waste (C&I waste) was categorised as a distinct type of waste in the UK. However with the implementation of the European Waste Catalogue¹² (EWC) as a method of coding waste, much of this waste is increasingly being categorised as 'Municipal Wastes'.

¹¹ WLWA Procurement Strategy - <http://www.westlondonwaste.gov.uk/west-london-waste-authority/procurement/>

¹² European Waste Catalogue - <http://www.environment-agency.gov.uk/static/documents/GEHO1105BJVS-e-e.pdf>

3.3.2 The DEFRA Survey of C&I waste arisings for 2009 estimated west London produced 845,000 tonnes of C&I waste during that year, which is a reduction of 621,000 tonnes (42%) from the previous C&I Survey in 2002/03, which estimated that 1,466,000 tonnes of C&I waste was produced. Conversely, the London Plan 2011 has estimated that west London produced 1,299,000 tonnes. For purposes of consistency, this Technical Report will use the more conservative London Plan (2011) C&I waste data estimate, as this was used as part of the basis for the apportionment figures determined for west London boroughs and offers flexibility over the DEFRA 2009 estimate.

3.3.3 Figure 3-2 displays the generation of C&I waste by sector in west London, with the largest source of waste arising in the retail and wholesale sector (approximately one third). The largest components of the C&I waste stream in west London are mixed waste (41%) followed by non-metallic waste (30%) and the remainder including mostly chemical or animal and vegetable wastes.

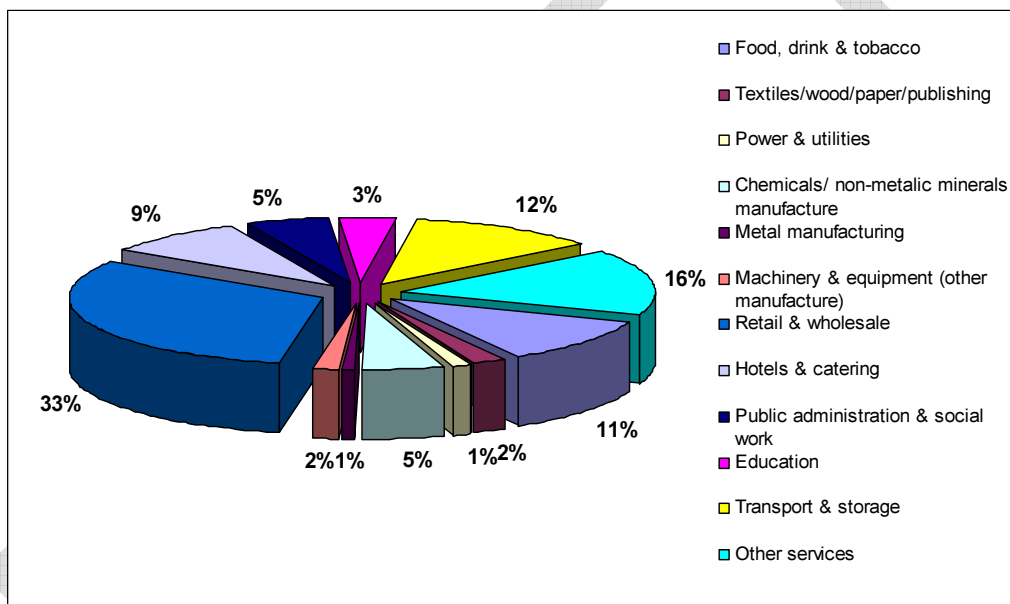


Figure 3-2 - C&I waste generation in west London by sector

3.4 Construction, Demolition and Excavation Waste

3.4.1 Construction, Demolition and Excavation waste (CD&E) waste makes up almost half of London's total waste, and this is also reflected in west London, where 47% of the total waste arising in the boroughs is CD&E waste.

Analysis of the most recent Environment Agency data (2009) for CD&E waste indicates that an estimated 754,000 tonnes was generated in west London, while 837,000 tonnes was transported into the area, resulting in a net importation of about 83,000 tonnes of CD&E waste. The principal fate of CD&E waste exported from west London is reprocessing (66%), with a further 30% landfilled, and the remaining

amount either treated or with an unknown fate. In comparison, 99% of CD&E waste imported into west London is transferred for treatment or disposal elsewhere, with the remainder managed through recycling, treatment or landfill within the area.

3.5 Hazardous Wastes

3.5.1 Hazardous wastes are categorised as those that are harmful to human health, or the environment, either immediately or over an extended period of time. They range from asbestos, chemicals, and oil through to electrical goods and fluorescent tubes. In 2009, west London exported approximately 73,000 tonnes. Compared with other waste streams generated in west London, hazardous waste is not a large waste stream, but is a sensitive one which requires a range of specialist facilities for treatment and disposal.

3.5.2 In 2009, west London boroughs exported hazardous waste to 48 different destinations across England, with the main destinations including Northamptonshire, the Western Riverside Waste Authority, Berkshire; and Surrey. The fate of this hazardous waste generated in west London is presented in Figure 3-3.

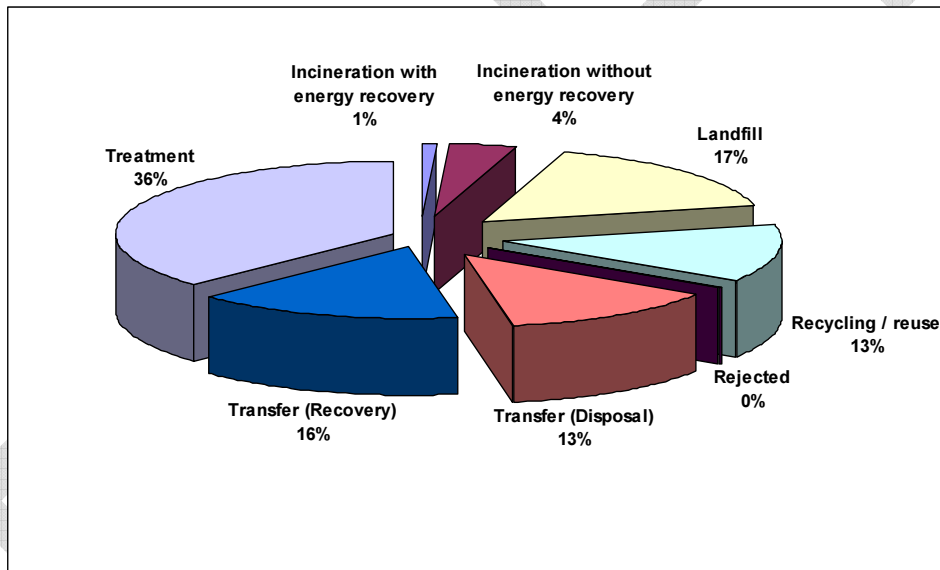


Figure 3-3 - Fate of hazardous waste arisings from west London (2009)

3.6 Wastewater and Sewage sludge

3.6.1 Thames Water Limited is responsible for wastewater and sewage sludge treatment in London and, as part of this responsibility, it manages key pieces of sewerage infrastructure, including a number of sewage treatment works (STW). The majority of wastewater in west London is either drained to Mogden STW in Isleworth, Beckton STW in East London, or Hogsmill STW in Kingston upon Thames. During 2010, these facilities generated over 100,000 tonnes of sewage sludge (dry solids) with all of this sludge being beneficially reused through either incineration with energy recovery, recycled to agricultural land or used for land restoration.

3.7 Healthcare Waste

3.7.1 Healthcare waste covers a wide range of hazardous and non-hazardous waste including from hospitals, nursing homes, health centres, GP, dental or veterinary surgeries etc. West London's healthcare waste is either managed by the boroughs (Ealing, Hounslow and Richmond upon Thames) or their Primary Care Trusts (PCT) where the collection, transfer and disposal is taken care of by local waste contractors (Harrow). Brent and Hillingdon have a combination of the two, in which they only undertake the management of household collections with contractors managing the remainder. Healthcare waste accounts for approximately 822 tonnes per year of waste arising in west London. However, Hillingdon hospital also has an incinerator used for clinical waste disposal and it is estimated that this facility received approximately 7,600 tonnes of clinical waste for disposal in 2009.

3.8 Agricultural Waste

3.8.1 The total amount of agricultural waste arisings in west London in 2009 was approximately 6,900 tonnes. The majority of this waste (94%) was sent to a Civil Amenity site located in Harrow, with a further 5% composted in Hillingdon and the remaining 41 tonnes sent to a clinical transfer facility in Brent.

3.9 Radioactive Waste

3.9.1 Limited information is available regarding the generation of radioactive waste in west London, with no records held by either the Environment Agency or the Department of Energy and Climate Change. It is assumed that, as west London does not accommodate any nuclear power generation facilities, radioactive waste arisings in the area are low. The only identified sources that may generate small amounts of low level radioactive waste (LLW) and very low level radioactive Waste (VLLW) are hospitals and universities in the boroughs. Most radioactive waste produced by minor waste producers is not reported in the UK Inventory as it is either low volumes of LLW that can be disposed of by "controlled burial" at landfill sites, or low volume VLLW that can be disposed of with MSW and C&I wastes at landfill site.

3.10 Role of Landfill in the Disposal of Waste

3.10.1 Landfill disposal accounted for approximately 1,056,000 tonnes of west London's waste in 2009, with over 94% of that exported to landfill facilities outside of west London. The remaining 60,080 tonnes was sent to Harmondsworth Landfill located in southwest Hillingdon. Figure 3-4 illustrates the majority of this was sent to both Buckinghamshire (28%) and Bedfordshire (24%), followed by Oxfordshire (12%) and the remaining 36% was divided between eight other authorities.

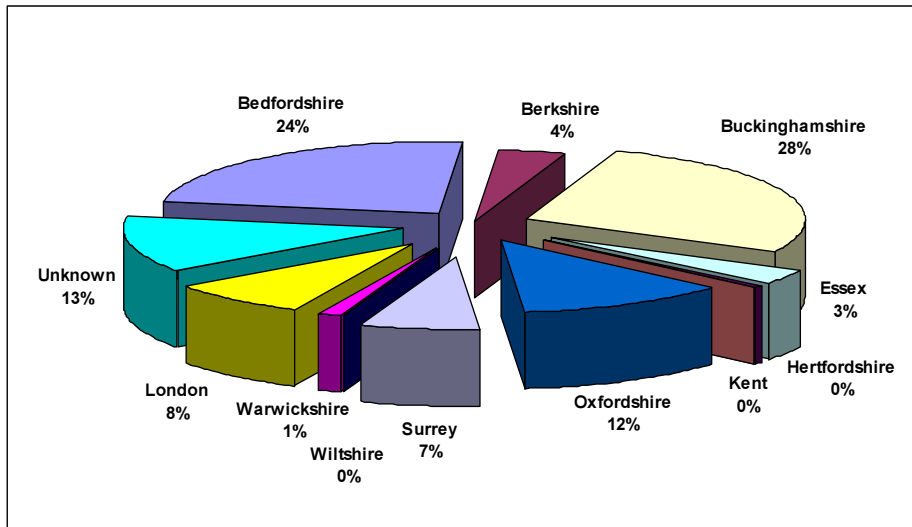


Figure 3-4 - Destinations where west London sends residual waste for landfill disposal (2009)

3.10.2 There are several different types of landfill, all of which play a different role in helping to manage west London's waste. Generally these are categorised by the types of waste they can accept for disposal.

3.10.3 Non-hazardous landfill usually accounts for residual MSW and C&I waste, whereas Inert Landfill usually accounts for CD&E waste. Hazardous waste landfills are highly specialised and only accept certain hazardous waste, while stable, non-reactive hazardous waste (SNRHW) landfill can be placed in a cell (specifically designed in a landfill to accept SNRHW (e.g. asbestos)) isolated from biodegradable waste.

In order to ensure that for the life of the WLWP there continues to remain capacity in areas surrounding London for the landfill of residual waste, further information was sourced. Published waste planning documents for the counties and regions concerned were consulted and followed up with discussions with local waste officers to cross-reference and confirm the information where possible.

Regional Spatial Strategies for London, the South East and East of England all refer to the requirement for the on-going (but declining) landfilling of residual waste from London in surrounding areas and provide directions on the apportionment for each of the waste planning authorities in their region. Subsequently, the counties that currently landfill residual waste from west London in significant quantities (as per Figure 3-4) will continue to be able provide capacity to receive waste for disposal at landfill from west London during the life of the WLWP, albeit in declining amounts.

4 Future waste management

4.1 How much waste will need to be managed in west London?

4.1.1 The London Plan (2011) sets a target for London to become the equivalent of 100% self-sufficient in the management of waste by 2031. To achieve this target each borough has been given a share of London's total MSW and C&I waste to manage (called the borough's "apportionment" figure) for which it must identify sufficient and suitable potential sites for the development of waste management facilities. The west London boroughs have pooled their apportionments and will meet the collective apportionment figures.

4.1.2 Waste arisings projections are also included in the London Plan (2011), with these figures considered the most up-to-date for west London and were also used by the Mayor to determine the apportionment figures. The waste arisings and apportionment figures for west London are displayed in Table 4-1.

Table 4-1: Quantity of waste forecast to be produced in west London and the apportionment figures from the London Plan (2011) for target years

	2011	2016	2021	2026
MSW arisings (tonnes per annum)	798,000	826,000	852,000	879,000
C&I waste arisings (tonnes per annum)	1,287,000	1,258,000	1,240,000	1,233,000
Total (MSW and C&I waste) arisings (tonnes per annum)	2,085,000	2,084,000	2,092,000	2,112,000
London Plan (2011) Apportionment (tonnes per annum)	1,399,000	1,595,000	1,798,000	2,019,000

4.2 How much land is needed?

4.2.1 The London Plan (2011) is the statutory regional strategy of London. In order to comply with central Government requirements and be considered a "sound" planning document, the West London Waste Plan is being prepared in accordance with the waste projections and apportionment figures contained in the London Plan (2011). The west London boroughs are not required to meet the individual MSW and C&I waste apportionment figures in the London Plan (2011) as long as the total apportionment figure is addressed.

4.2.2 Currently, west London has few waste management sites but it has many waste transfer sites which bulk waste for disposal elsewhere. The intention of the Plan is to maximise the use of the existing waste sites in the area, including re-orientation of some waste transfer sites to new waste management facilities, as well as the

identification of new sites in west London for waste management uses.

- 4.2.3 The current existing waste management capacity in west London is 811,541 tonnes per annum including both waste treatment sites and the recycling undertaken at household waste and recycling centres and civic amenity sites. Subsequently, west London will need to develop extra waste management facilities during the period to 2026 to address 'gap' between the apportionment figures and the waste management capacity that currently exists.
- 4.2.4 For the six west London boroughs to meet the apportionment for MSW & C&I waste, an additional 2,100,645 treatment capacity will need to be planned and licensed by 2021 and circa 3,222,380 tonnes by 2026. In order to determine how much area will be required to provide this waste management capacity, an average processing capacity of 54,012 tonnes per annum per hectare was used based on the range of possible processes and their processing intensity.
- 4.2.5 The London Plan (2011) does not prescribe the specific waste management technologies, their scale, nor the number that will need to be implemented across London. Accordingly, the West London Waste Plan also does not take a prescriptive approach to what types of waste management facilities/technologies are required. This approach will allow for innovation in the management of waste to be incorporated into development in west London.
- 4.2.6 The identification of the land required to meet the apportionment is displayed in Table 4-2 and shows that by 2026, west London boroughs need to have an additional 22.4 hectares of waste management capacity.

Table 4-2: West London Capacity Requirements for Target Years based on the 2011 London Plan

	2011	2016	2021	2026
Apportionment (tonnes per annum)	1,399,000	1,595,000	1,798,000	2,019,000
Total existing waste management capacity (tonnes per annum)	811,541	811,541	811,541	811,541
Additional capacity required to meet the apportionment (tonnes per annum)	587,459	783,459	986,459	1,207,459
Land to address the capacity gap (hectares)	10.9	14.5	18.3	22.4

- 4.2.7 The West London Waste Plan has identified land area slightly above its requirements (using existing safeguarded and new sites) to give the Plan flexibility

should some sites not come forward for development during the lifetime of the Plan. Annual monitoring of the plan will prevent overprovision of sites occurring.

- 4.2.8 The Plan identifies 22.4 hectares of land is required to develop waste management capacity by 2026.
- 4.2.9 In order to meet this land allocation, eight existing waste transfer sites (accounting for 19.4 hectares) have been identified as suitable and available for reorientation into waste treatment facilities. An additional 9.2 hectares was identified as potentially deliverable from new sites in west London. Overall, it is thus estimated that within west London there is 27.6 hectares of land potentially available for waste treatment, which exceeds the land allocation required to meet the London Plan (2011) and creates flexibility in the Plan.

4.3 What kind of facilities will be needed?

- 4.3.1 Ensuring that more waste is managed within west London will mean that a range of different waste management facilities will be considered including recycling, composting and energy recovery. Modern waste management facilities utilise clean technologies and are subject to stringent regulation and monitoring of their operations and impacts. Innovative design and architecture can also be applied making facilities sensitive to their settings, although many technologies can be housed in industrial building similar in appearance to a warehouse. Table 3-4 in Appendix 4 to this report gives a brief description of the principal waste management technologies.
- 4.3.2 It is important that modern methods of dealing with waste are found which also seek to produce valuable, usable products such as fuel, heat and power. Waste facilities should be seen positively, as an opportunity rather than a 'bad neighbour', as they can be co-located with developments and industry to provide heat, power and other beneficial products attractive to industrial, commercial and potentially residential developments.
- 4.3.3 The West London Waste Plan identifies sites for general waste use and to use the policies within the Plan to manage such developments to ensure they are suitable for the site and its surrounding land uses. The Plan is designed to be flexible to allow for developments and improvements in waste management technologies and the changing habits of consumers and waste producers. A planning application will have to be submitted for each proposed development, which will be assessed in line with the West London Waste Plan and other borough plans and strategies and through public consultation.

4.4 Construction, demolition and excavation wastes

- 4.4.1 Construction, Demolition and Excavation (CDE) waste is a large waste stream within London, although it is not included within the apportionment target assigned to boroughs. Accordingly, no allocations are made in this plan for facilities dealing specifically with such wastes. The preference in west London is to ensure more on-site recycling and re-use takes place in accordance with Policy 5.18 of the London

Plan (2011) by using Policy WLWP 4 whilst ensuring that boroughs monitor the types and capacities of waste management facilities developed against any new waste arising data that is produced.

4.5 Hazardous wastes

- 4.5.1 Hazardous waste can cause concern amongst residents and communities; however it is also not included within the apportionment targets assigned to boroughs. Policy 5.19 of the London Plan (2011) states that the Mayor will prepare a Hazardous Waste Strategy for London and will work in partnership with the boroughs, the Environment Agency, industry and neighbouring authorities to identify the capacity gap for dealing with hazardous waste and to provide and maintain direction on the need for hazardous waste management capacity.
- 4.5.2 The West London Waste Plan therefore makes no specific provision for hazardous wastes. However, planning applications for hazardous waste facilities will be determined in the same way as applications for all waste management facilities and the capacity of hazardous waste facilities will be monitored closely to establish whether additional provision is required at a later date.

5 The Proposed Sites

5.1.1 The West London Waste Plan, in accordance with the criteria outlined in PPS10, has identified a number of existing and new sites which it considers will ensure adequate waste management provision for the lifetime of the Plan. The sites have been subject to a detailed evaluation and assessment which is documented in the accompanying Technical Report¹³. Further details of these sites including details of their locations, are contained in Appendices 4 and 5 of this Plan.

5.1.2 The Plan identifies (see paragraph 4.2.9) that 27.6 hectares are considered available on existing and new waste sites. Maps showing the location and the site boundary of all sites are provided in Appendices 4 and 5 of the Plan. Table 5-1 sets out those existing sites capable of redevelopment, while Table 5-2 refers to potential new waste sites.

Table 5-1: Existing waste sites considered to have potential for redevelopment

Site Number	Site Area (ha)	Borough	Description	Site Type
352	1.46	Brent	Twyford Waste Transfer Station	Transfer Station
1261	2.71	Brent	Veolia Transfer Station, Marsh Road	Transfer Station
309	1.15	Ealing	Greenford Reuse & Recycling Site,	Transfer Station
310	0.94	Ealing	Greenford Depot, Greenford Road,	Depot Facility
328	2.10	Ealing	Quattro, Victoria Road, Park Royal	Transfer Station
303	4.25	Hillingdon	Victoria Road Transfer Station	Transfer Station
353	3.11	Hounslow	Transport Avenue Waste Transfer Station	Transfer Station
342	3.67	Richmond	Twickenham Depot	Depot Facility

¹³ WLWP Technical Report November 2011 - <http://www.wlwp.net/documents.html>

Table 5-2: Proposed new sites with opportunity for developing waste management facilities

Site Number	Site Area (ha)	Borough	Description
222	1.83	Harrow	Council depot, Forward Drive
244	3.12	Hillingdon	Yeading Brook, Bulls Bridge
2861	3.20	Hounslow	Western International Market

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6 West London Waste Plan Policies

6.1 Policy WLWP 1 – Safeguarding and protection of Existing and Allocated Waste Sites

- 6.6.1 If west London is to make its required contribution to London’s self-sufficiency, it is vital that it safeguards and protects those waste management facilities that contribute to its waste apportionment target.

WLWP Policy 1 – Safeguarding and Protection of Existing and Allocated Waste Sites

Land accommodating existing waste management uses in west London are protected for continued use for waste management, together with waste transfer and civic amenity sites required for the delivery of the West London Waste Authority’s (WLWA) Municipal Waste Strategy.

Existing waste transfer sites which have been allocated as having the potential for redevelopment to waste management (Appendix 4, Table 4-1) and new sites with potential for development for waste management facilities (Appendix 5, Table 5-1) are also safeguarded.

To ensure no loss in existing capacity, re-development of any existing waste management sites must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste which the site is currently permitted to manage, or that the management of the waste is being moved up the waste hierarchy.

Development for non-waste uses will not be considered on the land allocated in tables 4-1 and 5-1 unless compensatory and equal provision of sites for waste, in scale and quality, is made elsewhere within the west London Boroughs.

- 6.1.2 Existing waste management sites are identified as those sites currently permitted for waste management activities. These sites each contribute to the waste capacity required to manage the tonnages of waste apportioned to west London in the London Plan. The continued protection of these sites contributes to the sub-region’s waste self-sufficiency.
- 6.1.3 Sites identified for the purposes of delivering the West London Waste Authority’s Municipal Waste Management Strategy are those sites required for the implementation of the WLWA’s waste management contracts and will be safeguarded from other types of development.
- 6.1.3 The sites in Table 4-1 are those existing sites the Plan considers have the potential for redevelopment to waste management sites including alternative forms of waste

management that could result in waste moving up the hierarchy. Table 5.1 of Appendix 5 contains the list of new sites that are allocated in the Plan for waste treatment facilities. The protection of these sites is required to ensure that the west London boroughs can comply with the apportionment requirement of the London Plan (2011).

6.2 Policy WLWP 2 – Location of Waste Development

- 6.2.1 As explained above in Section 3, in order to conform with central Government planning requirements and be considered a "sound" planning document, the Plan has been prepared on the basis of the waste planning apportionment figures in the current adopted London Plan (2011). Consequently, the Plan has identified over 27.6 ha of land for the development of waste management facilities to meet the pooled apportionment for the six west London boroughs up to 2026.
- 6.2.2 All existing waste management sites in the six boroughs, with potential for re-orientation, along with the allocated sites are safeguarded for waste management uses under this Plan, unless an equal and compensatory site can be found, or there is an appropriate level of movement up the waste hierarchy.
- 6.2.3 The West London Waste Plan lists the safeguarded existing sites and proposed new sites considered appropriate and suitable for waste management use in (Table 4-1, 4-2 of Appendix 4 and Table 5.1 of Appendix 5). Policy WLWP 2 sets out the key criteria against which planning applications for waste facilities will be determined for the proposed sites.

WLWP Policy 2 – Location of Waste Development

Waste development proposals on sites listed in Tables 4-1 and 5-1 will generally be supported, provided that the proposals comply with the other WLWP policies and the boroughs' adopted development plans.

Waste development on other sites, not listed in Tables 4-1 and 5-1, may be permitted if the proposals comply with the other WLWP policies and the boroughs' adopted development plans, and:

- It can be demonstrated that the development is not suitable for, or cannot be delivered at, any sites listed in Tables 4-1 and 5-1; or
- For some reason, identified sites have not come forward and it can be demonstrated that there is an emerging shortfall in the waste management capacity required to meet the boroughs' joint apportionment target; and
- there is no adverse cumulative effect, when taken together with existing waste management facilities, on the well-being of the local community, including any significant adverse impacts against the WLWP sustainability objectives; and
- The proposed site meets the criteria set out in policy WLWP3



6.2.4 The WLWP identifies site across West London which the boroughs have identified as most suitable for a variety of waste management technologies, depending on the particular site's opportunities and constraints. The Plan gives priority to the deliver of new waste management facilities on these sites. It is acknowledge that during the lifetime of the plan, windfall sites suitable for waste management may come forward. Policy WLWP 2 makes provision for the assessment of these sites to ensure that this will not result in an over supply of waste management capacity within west London and to take account of the potential cumulative impacts of waste sites located within close proximity in accordance with PPS10.

6.3 Policy WLWP 3 – Ensuring High Quality Development

6.3.1 Modern waste management facilities should bring a benefit to the local community and environment. Policy WLWP 3 provides a range of criteria to ensure developers consider and mitigate the impacts of their development on the environment, the community and the appearance of the local area. Developments should also comply with any adopted borough Development Plans, including Core Strategies, Development Management DPDs, Site Allocations and Area Action Plans

6.3.2 As a general principle, all waste developments will be expected to complement the surrounding area and act as a good neighbour to all existing developments.

6.3.3 Noise, litter and all other emissions are expected to be adequately controlled so as not to cause any adverse impact on the surrounding area. Developers will be expected to submit details of proposed control measures with any planning application.

- 6.3.4 Developers will be expected to have actively considered innovative and sustainable design approaches to ensure that the development is in accordance with best practice and complements the local area in terms of topography, landscape and colour. A Design and Access statement should be submitted to set out how the facility complements the local area and ensure that there is no adverse effect on existing transport facilities, Public Rights of Way, or public safety.
- 6.3.5 The road network within west London is regularly congested and therefore proposals must demonstrate active consideration of alternative transport uses. There must not be any significant or unacceptable adverse impacts on the local road network or other road users, in terms of congestion or parking, associated with the development. Proposals should demonstrate that adequate parking for all vehicles is available on site and that any necessary changes to the local road network are made.
- 6.3.6 Developers of waste facilities will need to fully identify the health implications of the development and plan the most appropriate development to protect the surrounding uses and community. If the proposed waste development is required to have an Environmental Impact Assessment, then a Health Impact Assessment is also required.

WLWP Policy 3 – Ensuring High Quality Development

All waste development proposals will be required to demonstrate, for the construction and operational phases of the development, that:

- Development will be permitted only where it can be shown that unacceptable impact to local amenity will not arise from the construction and/or operation of a facility.
- Adequate means of controlling noise, vibration, dust, litter, vermin, odours, air and water-borne contaminants and other emissions are incorporated into the scheme;
- The development is of a scale, form and character appropriate to its location and incorporates a high quality of design; to be demonstrated through the submission of a design and access statement.
- Active consideration has been given to the transportation of waste by modes other than road, principally by water and rail;
- Transport directly and indirectly associated with the development will not exceed the capacity of the local road network or result in any significant adverse impact on the amenities of the area. Where necessary, this is to be demonstrated by a Transport Impact Assessment;
- The development makes a positive contribution to climate change adaptation

and mitigation to be demonstrated through the submission of a sustainable design and construction statement;

- An appropriate BREEAM or CEEQUAL rating will be required to comply with any adopted borough Development Plans;
- The development has no significant adverse effects on local biodiversity and that it can be demonstrated that there will be no significant adverse impacts or effects on the integrity of an area designated under the “Habitats Directive”;
- There will be no significant impact on the quality of surface and groundwater. The development should incorporate the principles of Sustainable Urban Drainage Systems (SUDS) unless evidence is provided to justify alternative drainage methods.
- There will be no increased flood risk, either to the immediate area or indirectly elsewhere, in line with PPS25. Where necessary, this is to be demonstrated by a Flood Risk Assessment;
- Green Travel Plans have been considered, where appropriate.
- The site does not contain features, or will have a significant adverse effect on any heritage assets such as conservation areas, archaeological sites listed building etc.
- There is no foreseeable adverse impact on health and where necessary this is to be demonstrated by a Health Impact Assessment

In addition:

- Adjacent development proposals which would prevent or prejudice the use of safeguarded sites for waste purposes will be resisted unless suitable alternative provision is made.
- Applications shall provide details of the management arrangements for residues arising from any waste management facility.

6.4 Policy WLWP 4 – Decentralised Energy

6.4.1 New waste management and recycling methods can offer more efficient use of resources than existing waste management methods. Waste facilities can also contribute to the provision of decentralised energy by providing heat and power for use in domestic and industrial processes.

6.4.2 The London Plan (2011) encourages boroughs to take opportunities for the development of combined heat and power technologies.

Policy WLWP 4 – Decentralised Energy

All waste facilities that are capable of directly producing energy or a fuel must secure, where reasonably practicable:

- The local use of any excess heat in either an existing heat network or through the creation of a new network;
- The utilisation of biogas/syngas in Combined Heat and Power facilities, either directly through piped supply or indirectly through pressurisation and transport;
- The utilisation of any solid recovered fuel in Combined Heat and Power facilities or as a direct replacement for fossil fuels in London; or
- Any other contribution to decentralised energy in London.

Where it is demonstrated that the provision of decentralised energy is not economically feasible or technically practicable, the development shall not preclude the future implementation of such systems.

Energy from waste facilities will only be considered where it can be demonstrated that they are a recovery facility as defined in the Waste Framework Directive.

6.5 Policy WLWP 5 – Sustainable Site Waste Management

6.5.1 The management of waste in accordance with the waste hierarchy is a key element of European, National and regional policy. West London supports the increased management of wastes as far up the hierarchy as possible and each of the six boroughs has a commitment to waste minimisation and recycling. Waste minimisation is also an important issue to the residents and community within West London.

- 6.5.2 West London supports the use of local, reclaimed, renewable, recycled and low environmental impact materials in construction and estate management. Their details should be considered and included within the [sustainable design and construction statement](#) and the [Site Waste Management Plans](#). Materials should be sourced from within 100km from the site, where available and appropriate.

WLWP Policy 5 - Sustainable Management of Construction, Excavation and Demolition Waste

To encourage sustainable waste management, waste management developments will be permitted where it can be demonstrated that:

- At least 10% of the materials or products used in the construction and/or operation of the development are re-used or recycled and sourced from within 100km from the site;
- Construction, demolition and excavation wastes are reused or recycled on site, where practicable and environmentally acceptable; and
- Construction phase Site Waste Management Plans are comprehensive and capable of being delivered.

7 Monitoring of the West London Waste Plan

7.1.1 Once the West London Waste Plan is adopted, key performance indicators are proposed to be reported each year in the boroughs' Annual Monitoring Report to assess the effectiveness of the Plan's policies. This mechanism will enable the west London boroughs to compare quantities of waste actually produced with those forecast in the London Plan (2011) and to monitor development on the sites identified in the Plan. The boroughs will then consider whether the allocation of sites is sufficient and whether the Plan needs reviewing. The proposed indicators that will be reported both for each borough and the six combined west London boroughs include:

- Quantity of each type of waste produced;
- Total capacity (in tonnes) of new waste management facilities given planning permission in the previous year, by process (e.g. recycling, composting, anaerobic digestion etc) and against annual forecast of quantity of waste produced and how the new, additional, capacity, affects the total capacity within the plan area;
- Capacity (in tonnes) of new waste management facilities on existing sites (including re-developed transfer sites), on new sites allocated within the West London Waste Plan, and on non-allocated sites;
- The quantity of municipal waste generated per household;
- Re-use, recycling and composting figures for municipal waste;
- The quantity of municipal waste landfilled;
- Comparison of municipal and commercial & industrial waste that is managed compared with the apportionment targets set out in the London Plan (2011);
- Tonnage of construction, demolition and excavation waste produced and disposed of in the boroughs;
- Tonnage of hazardous waste produced and disposed of in the boroughs; and
- Other indicators that may be decided to measure performance against policies.

7.1.2 Where monitoring identifies that there is a major failure to meet the targets for waste management within the Plan area, the six west London boroughs will seek to identify the reasons why this is occurring and take effective management measures to correct any problems.

7.1.3 Table 7-1 indicates how the policies of the Plan will be monitored:

Table 7-1 - Monitoring programme for the West London Waste Plan

WLWP Policy	Indicator	Reason	Delivery	Delivery Agency
Policy WLWP 1 & 2	Number of safeguarded sites list and amount of compensatory measures achieved	To ensure no loss of waste capacity in the west London area	The planning process	Local Authorities
Policy WLWP 3	Number, type and capacity of waste facilities approved and completed at: safeguarded sites and new identified sites Impact of new sites	Compliance with sequential policy approach To ensure adequate waste capacity is being provided Number of sites failing to comply with any relevant environmental permit Number of enforcement complaints breaches of conditions	The planning process and combined private and public initiative to provide waste management developments	Wes London Waste Authority and private sector
Policy WLWP 4	Amount of energy produced and delivered	To ensure compliance with the aims of the London Plan 2011 and	Through the planning process	

WLWP Policy	Indicator	Reason	Delivery	Delivery Agency
		required carbon savings		
Policy WLWP 5	Amount of construction waste sent to landfill	Reduce amount of waste sent to landfill	Use of site waste management plans monitoring and enforcement of these and planning conditions	Developers West London Boroughs

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8 Glossary

Term/Acronym	Definition
Anaerobic Digestion (AD)	A process whereby biodegradable material is broken down in the absence of air (oxygen). Material is placed into a closed vessel and in controlled conditions it breaks down into digested material and biogas.
Apportionment	Please see 'London Plan Apportionment'.
Area Action Plan	Type of Development Plan Document focused on a specific location or area which guides development and improvements. It forms one component of a Local Development Framework.
Autoclave	A method of sterilisation. Waste is loaded into a rotating sealed cylinder and the biodegradable fraction of this waste is then broken down by steam treatment into a homogeneous organic 'fibre'.
Biodegradable	Biodegradable materials are generally organic, such as plant and animal matter and other substances originating from living organisms. They can be chemically broken down by naturally occurring micro-organisms into simpler compounds. Waste which contains organic material can decompose producing bio-gas, leachate and other by-products.
Biodegradable Municipal Waste (BMW)	The proportion of waste from households that is capable of undergoing natural decomposition such as paper and cardboard, garden and food waste. Typically BMW makes up around 68% of residual municipal solid waste (MSW).
Civic Amenity Site (CAS)	Facilities where members of the public can bring a variety of household waste for recycling or disposal. Materials accepted include, for example: paper, plastic, metal, glass and bulky waste such as tyres, refrigerators, electronic products, waste from DIY activities and garden waste. These sites are also known as 'HWRCs' (Household Waste Recycling Centres), or 'RRCs' (Reuse and Recycling Centres).
Climate Change	Regional or global-scale changes in historical climate patterns arising from natural and/or man-made causes that produce an increasing mean global surface temperature.
Clinical Waste	Waste arising from medical, nursing, veterinary, pharmaceutical, dental or related practices, where risk of infection may be present.
Combined Heat and Power (CHP)	The combined production of heat (usually in the form of steam) and power (usually in the form of electricity). The heat can be used as hot water to serve a district-heating scheme.
Commercial Waste	Waste produced from premises used solely or mainly, for the purpose of a trade or business or for sport, recreation or entertainment.

Term/Acronym	Definition
Commercial and Industrial Waste (C&I)	Waste arising from business and industry. Industrial waste is waste generated by factories and industrial plants. Commercial waste is waste produced from premises used solely or mainly, for the purpose of a trade or business or for sport, recreation or entertainment and arising from the activities of traders, catering establishments, shops, offices and other businesses. Commercial and Industrial waste may, for example, include food waste, packaging and old computer equipment.
Composting	A biological process which takes place in the presence of oxygen (i.e. it is aerobic) in which organic wastes, such as garden and kitchen waste are converted into a stable granular material. This can be applied to land to improve soil structure and enrich the nutrient content of the soil.
Construction, Demolition and Excavation Waste (CD&E)	Waste arising from the construction, maintenance, repair and demolition of roads, buildings and structures. It is mostly comprised of concrete, brick, stone and soil, but can also include metals, plastics, timber and glass.
Core Strategy	A Local Development Document (which is also a Development Plan Document) which provides a written statement of the core policies for delivering the spatial strategy and vision for a borough, supported by a reasoned justification.
Department for Communities and Local Government (DCLG)	The government department with overall responsibility for, amongst other things, the planning system.
Department for the Environment Food and Rural Affairs (DEFRA)	Government department with national responsibility for sustainable waste management amongst other things.
Development Management Document	A set of criteria-based policies in accordance with the Core Strategy, against which planning applications for the development and use of land and buildings will be considered. Also known as Site Development Policies.
Development Plan Document (DPD)	These are statutory local development documents prepared under the Planning and Compulsory Purchase Act 2004, which set out the spatial planning strategy and policies for an area. They have the weight of development plan status and are subject to community involvement, public consultation and independent examination.
Energy from Waste (EfW)	Energy that is recovered through thermally treating waste. EfW is also used to describe some thermal waste treatment plants.
Energy Recovery	The combustion of waste under controlled conditions in which the heat released is recovered to provide hot water and steam (usually) for electricity generation (see also Recovery).

Term/Acronym	Definition
Environment Agency (EA)	Environmental regulatory authority formed in 1996, combining the functions of the former National Rivers Authority, Waste Regulation Authorities and Her Majesty's Inspectorate of Pollution.
European Waste Catalogue ¹⁴ (EWC)	All wastes are categorised using a 6 digit code which identifies the source of the waste. For example, EWC code 20.01.01 is paper and cardboard, separately collected from municipal waste, whereas 20.03.01 is mixed municipal waste.
Environmental Permit (EP)	A permit issued by the Environment Agency to regulate the operation of a waste management activity. Formerly known as a Waste Management Licence.
Examination	Presided over by an Inspector or a Panel of Inspectors appointed by the Secretary of State; this can consist of hearing sessions, or consideration of written representations to consider whether the policies and proposals of the local planning authority's Development Plan Documents are sound. Only persons who have made representations seeking change to a Development Plan Document at the submission stage are entitled to an oral hearing at the examination.
Gasification	The thermal breakdown of organic material by heating waste in a low oxygen atmosphere to produce a gas. This gas is then used to produce heat/electricity.
Greater London Authority (GLA)	The GLA is a unique form of strategic citywide government for London. It is made up of a directly elected Mayor – the Mayor of London - and a separately elected Assembly – the London Assembly.
Green Belt	A planning designation to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
Green Waste	Organic waste from households, parks, gardens, wooded and landscaped areas such as tree prunings, grass clippings, leaves etc.
Greenhouse Gas	A gas in the Earth's atmosphere that traps heat and can contribute to global warming. Examples include carbon dioxide and methane.
ha	Hectare (10,000m ² of area, which is equivalent to 2.47 acres).
Habitat Directive Assessment	This is a requirement of the European Habitats Directive. Its purpose is to assess the impacts of plans and projects on internationally designated sites and nature conservation sites.

¹⁴ The full catalogue can be downloaded from http://www.environment-agency.gov.uk/static/documents/Leisure/EWC_31-03-09_CH.pdf

Term/Acronym	Definition
Hazardous Waste	Waste that contains potentially damaging properties which may make it harmful to human health or the environment. It includes materials such as asbestos, fluorescent light tubes and lead-acid batteries. The European Commission has issued a Directive on the controlled management of hazardous waste; wastes are defined as hazardous on the basis of a list created under that Directive.
Household Waste	Waste from a private dwelling or residential house or other such specified premises, and includes waste taken to household waste recycling centres.
Household Waste Recycling Centre (HWRC)	Facilities to which the public can bring household waste, such as bottles, textiles, cans, paper, green waste and bulky household items/waste for free disposal.
Incineration	The burning of waste at high temperatures in the presence of sufficient air to achieve complete combustion, either to reduce its volume (in the case of municipal solid waste) or its toxicity (such as for organic solvents). Municipal solid waste incinerators can recover power and/or heat. Incinerators are often referred to as EfW (energy from waste) plants.
Industrial Business Park (IBP)	Strategic employment location designed to accommodate general industrial, light industrial and research and development uses that require a higher quality environment and less heavy goods access than a Preferred Industrial Location.
Industrial Waste	Waste from a factory or industrial process.
Inert Waste	Waste that is not active – it does not decompose or otherwise change.
In-vessel Composting (IVC)	Shredded waste is placed inside a chamber or container through which air is forced. This speeds up the composting process. It is a controlled process and is capable of treating both food and green waste by achieving the required composting temperatures. It is also known as enclosed composting.
Joint Municipal Waste Management Strategy (JMWMS)	The development of a Municipal Waste Management Strategy is a dynamic process and results in a clear framework for the management of municipal waste, and waste from other sectors as appropriate. This sets out how authorities intend to optimise current service provision as well as providing a basis for any new systems or infrastructure that may be needed. The Strategy should act as an up to date, regularly reviewed, route-map for further investment required.
Kerbside Collection	Any regular collection of recyclables from premises, including collections from commercial or industrial premises as well as from households. Excludes collection services delivered on demand.
ktpa	kilo-tonnes per annum (a kilo-tonne is 1,000 tonnes).

Term/Acronym	Definition
Landfill	The deposit of waste onto and into land, in such a way that pollution or harm to the environment is prevented and, through restoration, to provide land which may be used for another purpose.
Local Development Framework (LDF)	A portfolio of local development documents that will provide the framework for delivering the spatial planning strategy and policies for an area.
Local Development Scheme (LDS)	A document setting out the local planning authority's intentions for its Local Development Framework; in particular, the Local Development Documents it intends to produce and the timetable for their production and review.
London Plan	This is the Spatial Development Strategy for London. This document was produced by the Mayor of London to provide a strategic framework for the boroughs' Unitary Development Plans. It will perform this function in respect of Local Development Frameworks. It was first published in February 2004 and alterations have since been published in September 2006, September 2007, February 2008 and July 2011. It has the status of a development plan under the Planning & Compulsory Purchase Act 2004.
London Plan Apportionment	Allocates to each individual borough a given proportion of London's total waste (expressed in tonnes) for which sufficient sites for managing and processing waste must be identified within their Local Development Frameworks.
Materials Recycling Facility or Materials Recovery Facility (MRF)	A special sorting 'factory' where mixed recyclables are separated into individual materials prior to despatch to reprocessors who prepare the materials for manufacturing into new recycled products.
Mechanical Biological Treatment (MBT)	A combination of mechanical separation techniques and biological treatment – either aerobic or anaerobic, or a combination of the two, which are designed to recover value from and/or treat fractions of waste.
Mechanical Heat Treatment (MHT)	A combination of mechanical and heating techniques which are designed to sterilise, stabilise and treat waste and recover value from it.
Municipal Solid Waste (MSW)	Any waste collected by or on behalf of a local authority. For most local authorities the vast majority of this waste is from the households of their residents. Some is from local businesses and other organisations such as schools and the local authority's own waste.

Term/Acronym	Definition
Planning Policy Statement 10 (PPS10)	Guidance documents produced by central government relating to 'Planning for Sustainable Waste Management' which set out a number of key concepts which should be considered and statutory requirements of local and regional planning policy documents.
Planning Policy Statement 12 (PPS12)	Guidance documents produced by central government relating to 'Local Spatial Planning'.
Planning Policy Statement 25 (PPS25)	Guidance documents produced by central government relating to 'Development and Flood Risk' which aims to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk
Preferred Industrial Location (PIL)	Strategic employment site normally suitable for general industrial, light industrial and warehousing uses.
Proposals Map	A map showing the location of the sites identified in the Plan
Pyrolysis	The heating of waste in a closed environment, in the absence of oxygen, to produce a secondary fuel product.
Railhead	This is a terminus of a railway line that interfaces with another transport mode e.g. road network.
RAMSAR	Sites which are wetlands of international importance designated under the Ramsar Convention.
Recovery	The process of extracting value from waste materials, including recycling, composting and energy recovery.
Recycling	Recovering re-usable materials from waste or using a waste material for a positive purpose.
Refuse Derived Fuel (RDF)	Material produced from waste that has undergone processing. Processing can include separation of recyclables and non-combustible materials, shredding, size reduction, and pelletising.
Re-use	The re-use of materials in their original form, without any processing other than cleaning.
Re-use and Recycling Centre (RRC)	Facilities to which the public can bring household waste, such as bottles, textiles, cans, paper, green waste and bulky household items/waste for free disposal.
Scoping	The process of deciding the scope and level of detail of the strategic environmental assessment (SEA) or environmental impact assessment (EIA) which might be required to support a planning application.
Section 106 Agreement	A legal agreement between the planning authority (borough) and the developer, linked to a planning permission, which requires the developer to carry out works to offset the potential impacts of their development or to benefit the local community.

Term/Acronym	Definition
Self-sufficiency	Dealing with wastes within the administrative region where they are produced.
Site Development Policies	A set of criteria-based policies in accordance with the Core Strategy, against which planning applications for the development and use of land and buildings will be considered. To set out all qualifying site allocations other than those contained in Area Action Plans.
Site of Special Scientific Interest (SSSI)	A specifically defined area which protects ecological or geological features.
Site Waste Management Plan (SWMP)	A detailed plan setting out how waste will be managed during a construction project. This is a legal requirement for most construction projects.
Solid Recovered Fuel (SRF)	These are solid fuels (also known as 'Refuse Derived Fuels' – RDF) prepared from non-hazardous waste to be utilised for energy recovery.
Sound (Soundness)	According to PPS 12 (¶4.52) for a plan to be “sound” it should be justified, effective and consistent with national policy. “Justified” means that the document must be: founded on a robust and credible evidence base and must be the most appropriate strategy when considered against the reasonable alternatives. “Effective” means that the document must be: deliverable, flexible, and able to be monitored
Spatial Planning	Spatial Planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.
Special Protection Areas (SPA)	A SSSI is considered to be of international importance designated under the EC Directive on the Conservation of Wild Birds.
Statement of Community Involvement (SCI)	A statement of a local authority’s policy for involving the community in preparing and revising local development documents and for consulting on planning applications.
Strategic Employment Locations (SELs)	These comprise Preferred Industrial Locations, Industrial Business Parks and Science Parks and exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of the general business, industrial and warehousing sectors.
Strategic Environmental Assessment (SEA)	A system of incorporating environmental considerations into policies, plans and programmes. It is sometimes referred to as Strategic Environmental Impact Assessment and is a legally enforced assessment procedure required by Directive 2001/42/EC.

Term/Acronym	Definition
Sub-Regions	Sub-regions are the primary geographical features for implementing strategic policy at the sub-regional level.
Sustainable Waste Management	Using material resources efficiently to cut down on the amount of waste we produce and, where waste is generated, dealing with it in a way that actively contributes to economic, social and environmental goals of sustainable development.
Sustainability Appraisal (SA)	A formal process which analyses and evaluates the environmental, social and economic impacts of a plan or programme.
Sustainability Appraisal Commentary	A commentary report that raises sustainability issues relating to the Issues and Options report.
Transport for London (TfL)	An integrated body responsible for the Capital's transport system. The primary role of TfL, which is a functional body of the Greater London Authority, is to implement the Mayor of London's Transport Strategy and manage transport services across London.
Thermal Treatment	Treatment of waste using heat e.g. incineration, pyrolysis, gasification, etc.
tpa	Tonnes per annum.
Unitary Development Plan (UDP)	A type of development plan introduced in 1986, that is to be replaced by Local Development Frameworks.
Waste Arising	The amount of waste generated in a given locality over a given period of time.
Waste Collection Authority (WCA)	Organisation responsible for collection of household waste e.g. your local council.
Waste Development Plan Document (WDPD)	Planning document which will provide a basis for the provision of waste management infrastructure in the sub-region e.g. the West London Waste Plan (see 'West London Waste Plan').
Waste Disposal Authority (WDA)	Organisation responsible for disposing of municipal waste. For west London this is the West London Waste Authority (WLWA).
Waste Hierarchy	An order of waste management methods, enshrined in European and UK legislation, based on their predicted sustainability. The hierarchy is summarised as "reduce (prevent), re-use, recycle/compost, recover, dispose".
Waste Management Capacity	The amounts of waste currently able to be managed (recycled, composted or recovered) by waste management facilities within west London.

Term/Acronym	Definition
Waste Management Licence (WML)	The licence required by anyone who proposes to deposit, recover or dispose of controlled waste. These are now known as Environmental Permits.
Waste Minimisation	Reducing the volume of waste that is produced. This is at the top of the Waste Hierarchy.
Waste Planning Authority (WPA)	Local authority responsible for waste planning. In west London the six boroughs are the Waste Planning Authority for their area.
Waste Transfer Station	A facility where waste is delivered for sorting prior to transfer to another place e.g. landfill.
West London Waste Authority (WLWA)	West London's statutory waste disposal authority. The WLWA's main function is to arrange the disposal of waste collected by its six constituent boroughs.
West London Waste Plan (WLWP)	The Waste Development Plan Document being produced for west London (see 'Waste Development Plan Document').

9 Appendices

Appendix 1: Sustainability Appraisal

Appendix 2: General waste treatment facility descriptions

Appendix 3: Borough waste projection and apportionment figures - London Plan (2011)

Appendix 4: Map of existing waste management sites considered to have potential for re-development as waste management facilities

Appendix 5: Map of proposed new sites with opportunity for developing waste management facilities

Appendix 1 - Sustainability Appraisal

The purpose of Sustainability Appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of revisions of Regional Spatial Strategies and for new or revised Development Plan Documents and Supplementary Planning Documents.

This process will ensure that planning decisions are made that accord with the principles defined in the Government's UK Sustainable Development agenda¹⁵. The timing of the Sustainability Appraisal aims to ensure that sustainability considerations are taken into account early in the process of policy development.

Sustainability Appraisals must also, where appropriate, incorporate the requirements of the Strategic Environmental Assessment Directive (2001/EC/42) (SEA Directive)¹⁶. The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. This has been transposed into UK law through the SEA Regulations (July 2004)¹⁷. The purpose of the SEA Directive is "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development".

Sustainability Appraisal Approach

The approach adopted for the Sustainability Appraisal was iterative and involved a high degree of interaction between those individuals responsible for the Sustainability Appraisal and those individuals responsible for development of the Plan.

Scoping

The first stage in the Sustainability Appraisal process (Stage A of DCLG guidance) involves assembling information on the existing environmental, social and economic baseline to provide a starting point for appraising the effects of implementing the Plan. To provide a sound basis for analysis, the Sustainability Appraisal Scoping Report also identified relevant plans and programmes, key sustainability issues and problems and detailed a Sustainability Framework through which the appraisal could

¹⁵ Defra Sustainable Development Unit - <http://www.sustainable-development.gov.uk/publications/uk-strategy/framework-for-sd.htm>.

¹⁶ European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the Strategic Environmental Assessment or 'SEA Directive')

¹⁷ The Environmental Assessment of Plans and Programmes Regulations. Statutory Instrument 2004 No. 1633.

take place; this information was reported in the form of the Sustainability Appraisal Scoping Report¹⁸.

Issues and Options

The Issues and Options vision and objectives were tested for compatibility with the Sustainability Appraisal objectives through a compatibility matrix. During development of the draft issues and options for the Plan, the draft Sustainability Framework set out in the Sustainability Appraisal Scoping Report was applied to each potential option (Stage B of DCLG guidance).

A Sustainability Commentary¹⁹ was produced in which the key findings were provided in association with each of the identified issues and options. The Sustainability Commentary was prepared to meet the requirements of DCLG guidance (para 3.39) *“As each option is refined, a commentary on the key sustainability issues and problems arising must be prepared, with recommendations on how each of the options could be improved, e.g. through mitigation measures.”*

Proposed Sites and Policies/Draft Plan

The Proposed Sites and Policies for the Plan were developed taking into account findings presented in the Sustainability Commentary as well as the results of consultation on the Issues and Options and relevant evidence base material.

The Proposed Sites and Policies were tested for compatibility with the Sustainability Appraisal Objectives and the results were taken into account, as necessary, during further drafting and refinement of the options.

The Site Assessment Criteria used to evaluate the long list of sites were assessed using the Sustainability Appraisal objectives, and the results were incorporated into the Plan.

The majority of the Sustainability Appraisal objectives are addressed by the site selection criteria. When it was considered that the objectives were not being met, mitigation was recommended and incorporated into the Plan.

The policies contained within the Plan were assessed against sustainability objectives. Where mitigation was recommended this has been addressed where appropriate in the Plan.

¹⁸ Sustainability Appraisal Scoping Report for the WLWP July 2008.

¹⁹ West London Waste Plan Issues and Options, Sustainability Appraisal, Sustainability Commentary, February 2009.

The SEA Directive requires the significant environmental effects of implementing the plan or programmes to be monitored “*in order to identify unforeseen adverse effects and to be able to undertake remedial action*” (Article 10(1)). Responsible Authorities must ensure when designing their monitoring arrangements that they comply with this provision. This guidance uses the term ‘SEA monitoring’ to cover the overall monitoring of environmental effects. The Sustainability Appraisal Report includes draft monitoring recommendations and these will be updated following the consultation period.

Reporting

Outputs from the Sustainability Appraisal are presented in this Sustainability Appraisal Report which is designed to fulfil the requirements of the SEA Directive in respect of the Strategic Environmental Assessment Environmental Report. This report is published alongside the Proposed Sites and Policies Report.

Strategic Flood Risk Assessment

The Strategic Flood Risk Assessment (SFRA) was undertaken to ensure that flood risk is considered as part of the spatial planning process. As required in Planning Policy Statement 25²⁰, we have used the findings of the Strategic Flood Risk Assessment on regional and local flood risk issues in the assessment of sites suitable for waste management.

Equalities Impact Assessment

The Equalities Impact Assessment (EqIA) was undertaken to ensure that the West London Waste Plan does not discriminate against specific target groups. The Equalities Impact Assessment of the Issues and Options identified the options that may have a negative impact on certain target groups. Since the development of the Plan’s policies, a further assessment has been undertaken and suggested mitigation has been incorporated into the Plan and Sustainability Appraisal Report. We have taken this into account when developing the Proposed Sites and Policies to ensure that no target group experiences a high level negative impact from the West London Waste Plan. The EqIA will be published alongside the Proposed Sites and Policies/ Draft Plan.

Habitats Regulations Assessment

²⁰ *Planning Policy Statement 25: Development and Flood Risk – DCLG, 2006.*

The Habitats Regulations Assessment relates to Natura 2000 sites designated under the European Habitats and Birds Directives²¹.

In October 2009 a screening exercise was carried out to determine the need for a Habitat Directive Assessment of the potential impacts of the West London Waste Plan's Issues and Options upon any European designated site located within 10 km of the six west London boroughs. The report concluded that some of the Issues and Options had the potential to impact the Natura 2000 sites identified, and that an Appropriate Assessment and ascertainment of the effect on site integrity was required. A further screening exercise to determine whether any of the recently developed policies are likely to trigger the need for a full Habitats Directive Assessment of the Plan, in compliance with the EC Habitats Directive, was undertaken.

The Plan policies have now been updated to incorporate the recommendations from the Habitats Regulations Assessment Screening. The Screening Report therefore concludes that the Plan is unlikely to have an adverse effect on the qualifying features of any Natura 2000 sites and therefore no further work is required. This Screening Report is published alongside the Proposed Sites and Policies and will be available to individuals and organisations involved in consultation on the Proposed Sites and Policies.

The Strategic Flood Risk Assessment, Equalities Impact Assessment and Habitats Directive Screening Assessment can be found at <http://www.wlwp.net/>.

²¹ *European Directive 92/43/EC on the conservation of natural habitats and of wild fauna and flora and European Directive 79/409/EEC on the conservation of wild birds.*

Appendix 2: General Waste Treatment Facility Description

Facility type	General Description	General Appearance
Materials Recovery Facility (MRF)	A facility that sorts recyclable material collected from households or businesses into separate materials. The materials are then sent for reprocessing into useful materials or products.	Consists of mechanical sorting equipment and conveyor belts. Normally housed inside a warehouse type building.
Composting	Composting facilities are generally enclosed in special units to minimise odours. Enclosed composting units can compost food and garden waste collected from homes and businesses.	Generally housed inside warehouse type buildings.
Recycling and Reuse Centre (RRC)	Site for the public to take recyclable and general waste to. The sites normally consist of skips and containers for a wide range of different materials, encouraging recycling.	Open facilities with accessible waste containers.
Mechanical Biological Treatment (MBT)	MBT is generally used to treat general (residual) waste (that is waste that is not in the recycling bin) from homes and businesses. The waste is treated biologically and mechanically which essentially separates the materials suitable for recycling from an organic fraction which is generally used as a fuel or can be composted.	Generally housed inside warehouse type buildings.
Anaerobic Digestion	Anaerobic Digestion is only suitable for organic wastes such as food and garden waste. The waste is enclosed in tanks without oxygen and digested to produce a biogas which can be used as a fuel. A sludge is also produced which can be composted and used on land.	Large industrial tanks and warehouse-type buildings.
Gasification/Pyrolysis/Autoclave	Advanced thermal treatment technologies are methods of breaking down waste using heat, to produce heat and power. Gasification uses a little oxygen to break the waste down whereas pyrolysis does not use any oxygen. Such methods give more control over the process and reduce emissions. Autoclaving involves 'cooking' the waste with steam to separate materials to produce recyclables and fuel.	Industrial type buildings, normally with a chimney.

Appendix 3: Borough waste arisings and apportionments

Waste arising figures –London Plan 2011

Borough	2011		2016		2021		2026		2031	
	MSW	C&I	MSW	C&I	MSW	C&I	MSW	C&I	MSW	C&I
Brent	136	202	143	200	149	199	156	196	161	194
Ealing	158	232	164	219	170	211	176	209	181	207
Harrow	120	143	123	139	126	136	129	134	131	133
Hillingdon	152	336	157	335	162	338	167	341	171	348
Hounslow	132	231	136	223	140	215	144	212	147	211
Richmond	100	143	103	142	105	141	107	141	109	143
Totals	798	1,287	826	1,258	852	1240	879	1,233	900	1,236

All figures are in a 1000 tonnes. MSW = Municipal Solid Waste C&I = Commercial and Industrial Waste

Waste apportionment figures –London Plan 2011

Borough	2011		2016		2021		2026		2031	
	MSW	C&I	MSW	C&I	MSW	C&I	MSW	C&I	MSW	C&I
Brent	90	160	109	174	130	190	152	207	175	225
Ealing	114	202	138	221	165	241	193	262	221	286
Harrow	57	101	69	110	82	120	96	131	111	143
Hillingdon	96	170	116	186	139	202	162	220	186	240
Hounslow	92	165	112	179	134	195	157	213	180	232
Richmond	56	100	68	109	81	119	95	129	109	141
Totals	505	898	612	979	731	1067	855	1162	982	1267

All figures are in a 1000 tonnes. MSW = Municipal Solid Waste C&I = Commercial and Industrial Waste

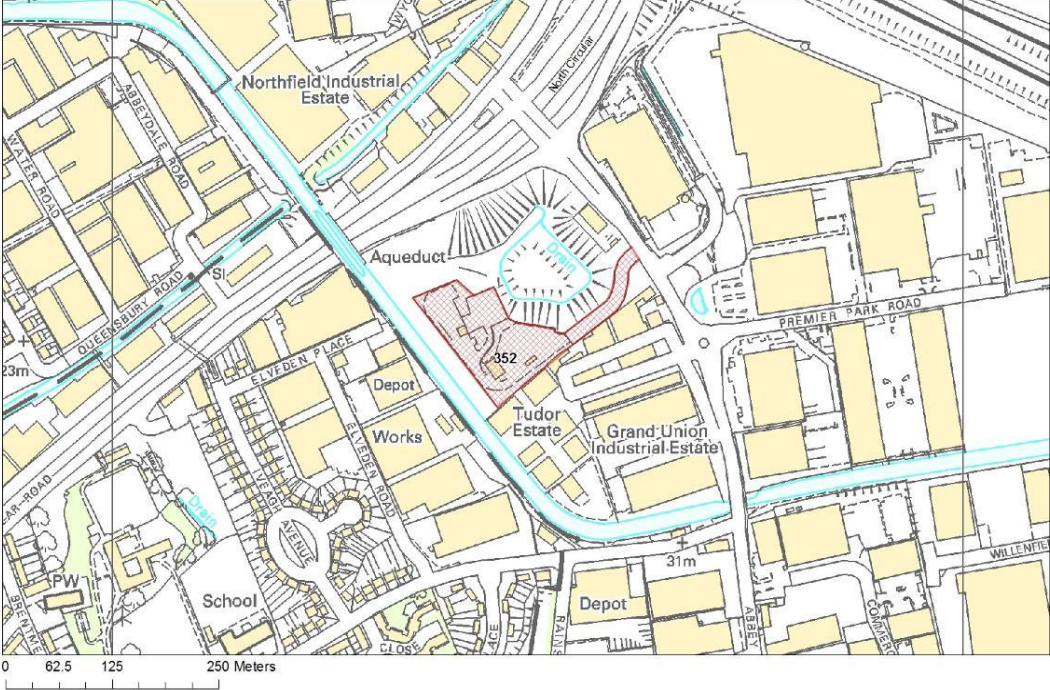
Appendix 4: Details of Existing Waste Management Sites considered to have potential for re-development as waste management facilities

Table 4-1 Existing Waste Management and Waste Transfer Sites

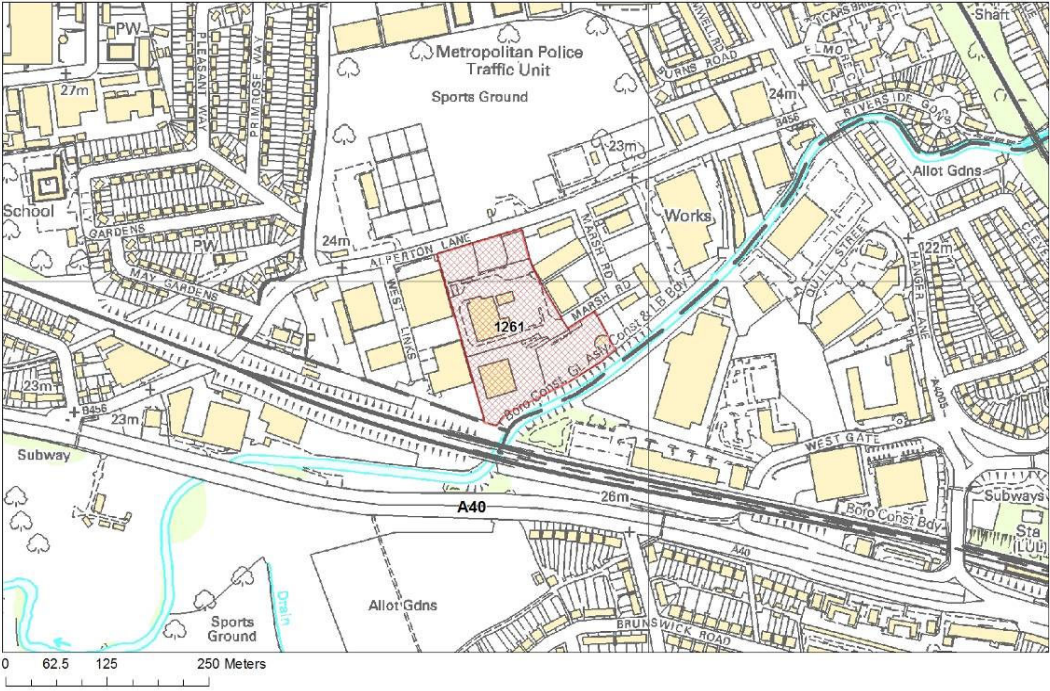
Table 4-2: Existing waste sites considered to have potential for redevelopment

Site Number	Site Area (ha)	Borough	Description	Site Type
352	1.46	Brent	Twyford Waste Transfer Station	Transfer Station
1261	2.71	Brent	Veolia Transfer Station, Marsh Road	Transfer Station
309	1.15	Ealing	Greenford Reuse & Recycling Site	Transfer Station
310	0.94	Ealing	Greenford Depot, Greenford Road	Depot Facility
328	2.10	Ealing	Quattro, Victoria Road, Park Royal	Transfer Station
303	4.25	Hillingdon	Victoria Road Transfer Station	Transfer Station
353	3.11	Hounslow	Transport Avenue Waste Transfer Station	Transfer Station
342	3.67	Richmond	Twickenham Depot	Depot Facility

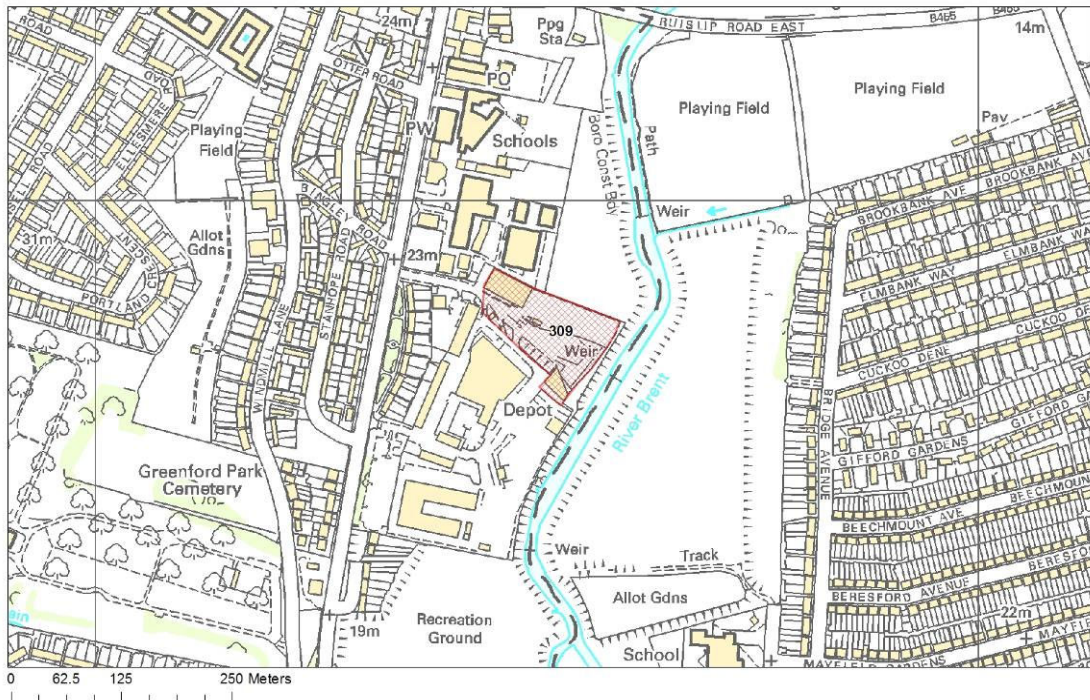
Site 352 Twyford Waste Transfer Station, Abbey Road, Brent



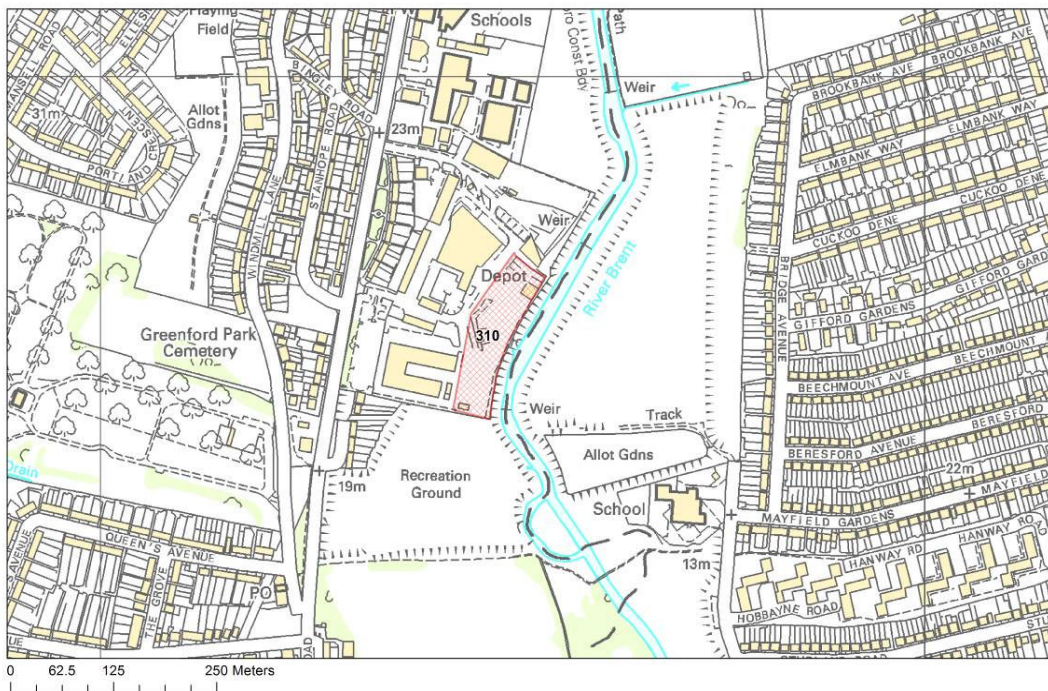
Site 1261 Veolia Transfer Station, Marsh Road, Alperton, Brent



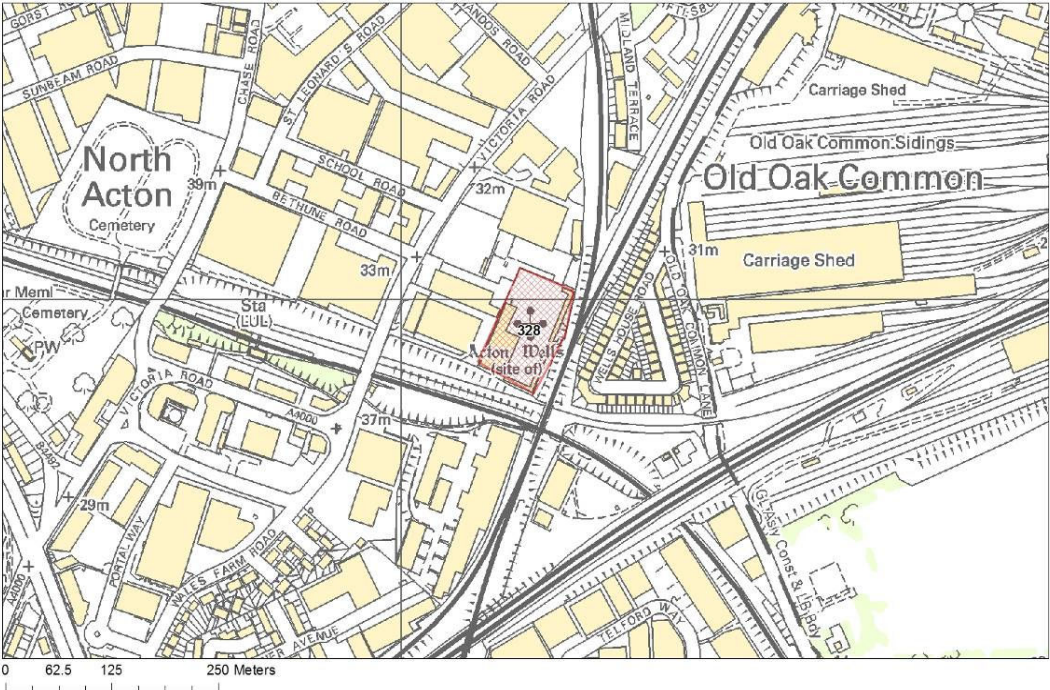
Site 309 Greenford Reuse & Recycling Site, Greenford Road, Greenford, Ealing



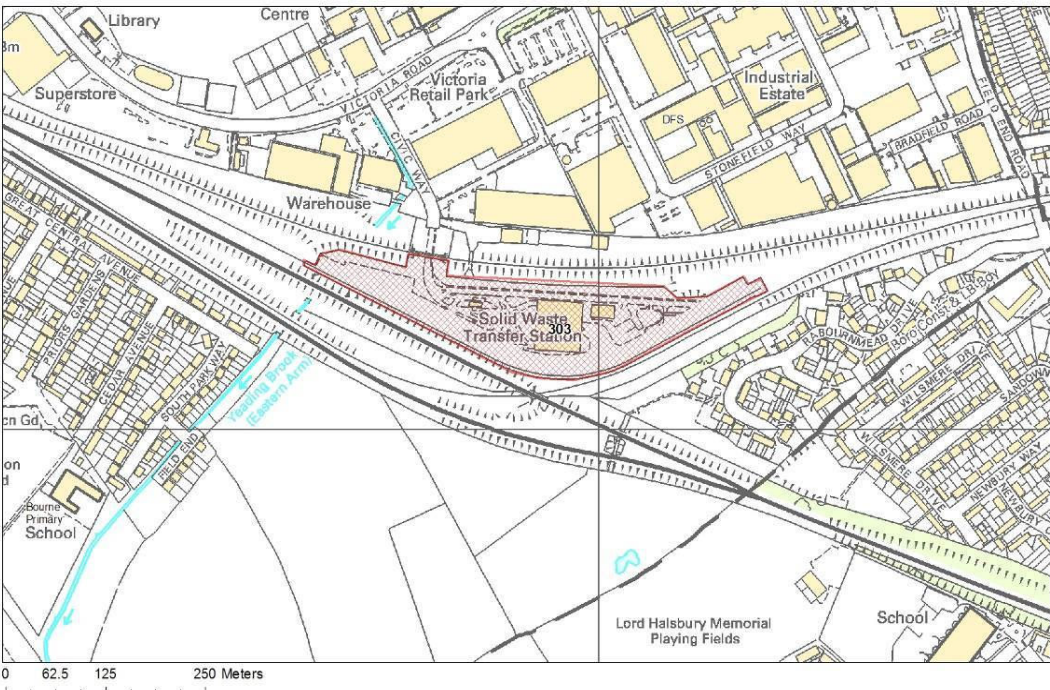
Site 310 Greenford Depot, Greenford Road, Greenford, Ealing



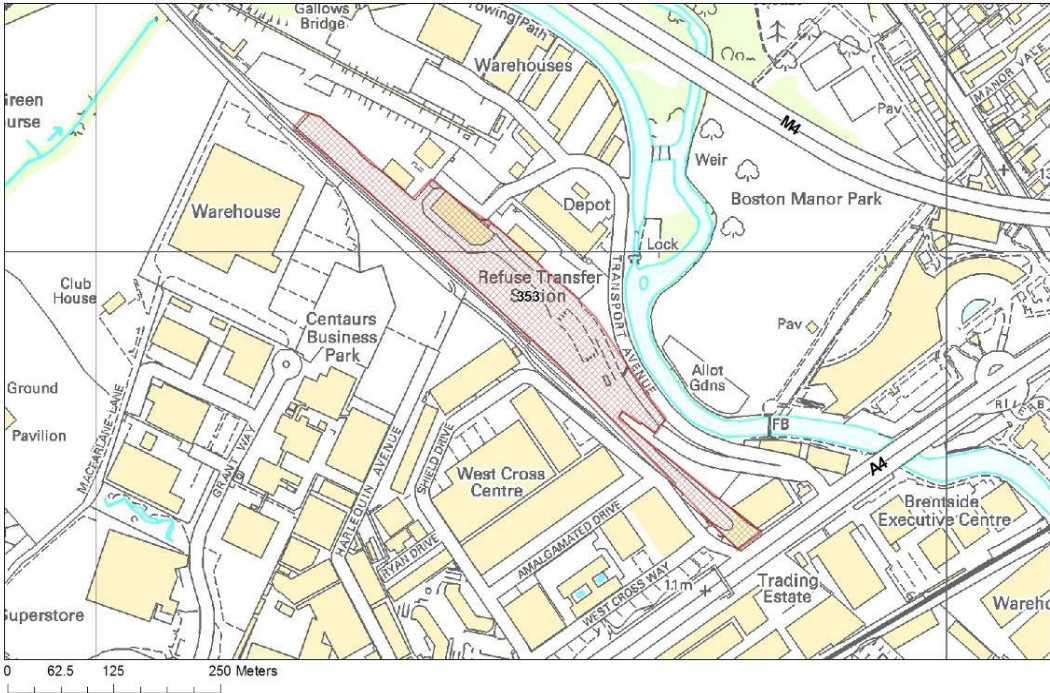
Site 328 Quattro, Victoria Road, Park Royal, Ealing



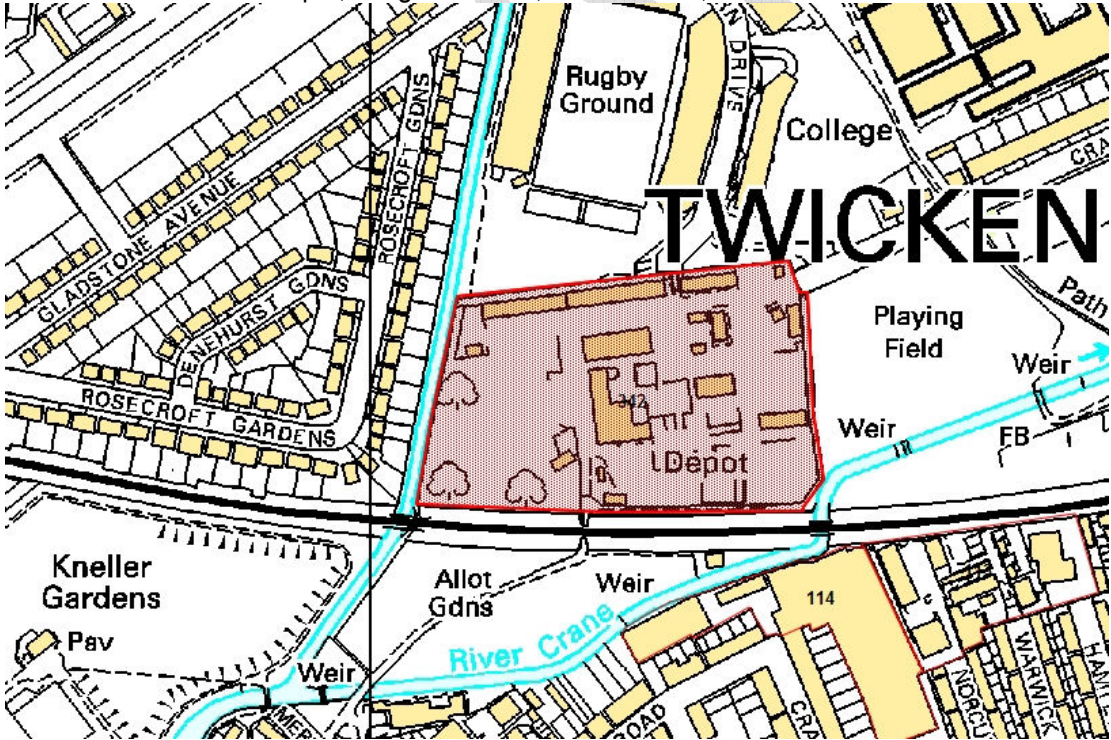
Site 303 Victoria Road Waste Transfer Station, Civic Way, Hillingdon



Site 353 Transfer Avenue Waste Transfer Station, Brentford, Hounslow



Site 342 Twickenham Depot, Langhorn Drive, Twickenham, Richmond

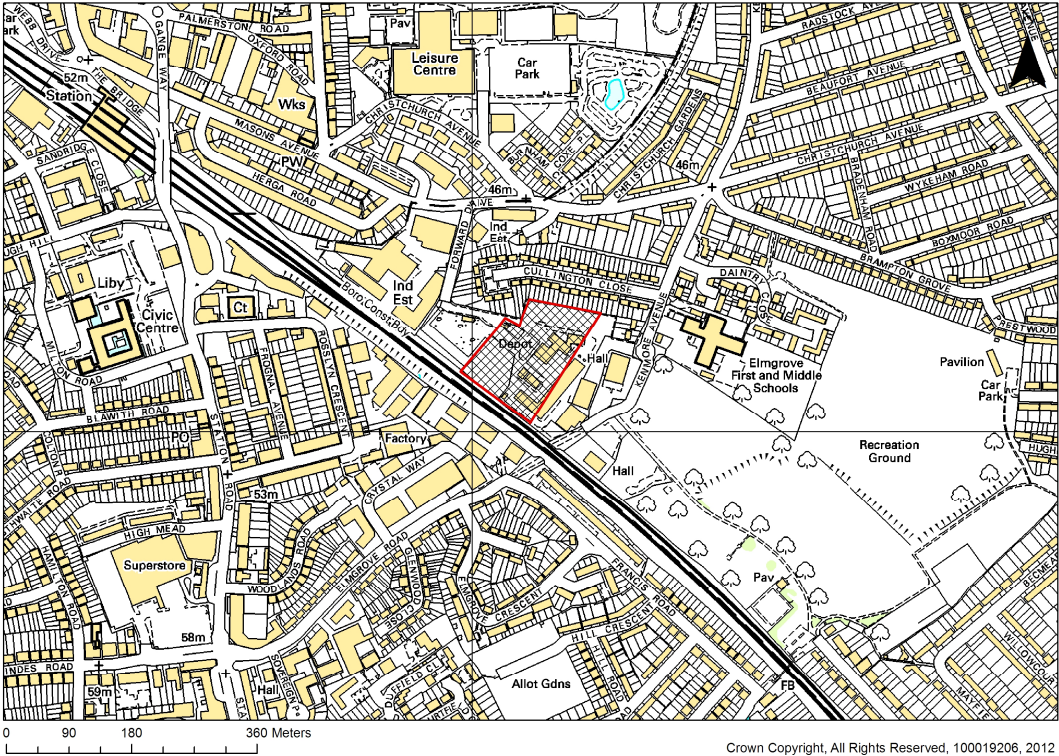


Appendix 5: Details of Proposed New Sites with opportunity for developing waste management facilities

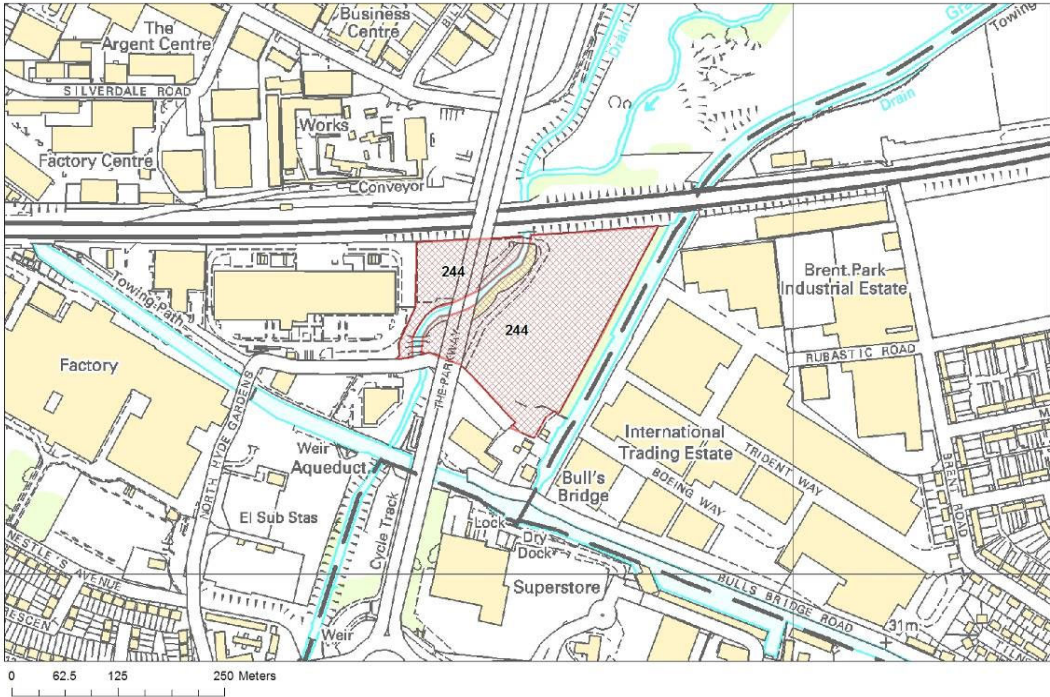
Table 0-2: Proposed new sites with opportunity for developing waste management facilities

Site Number	Site Area (ha)	Borough	Description
222	1.83	Harrow	Council depot, Forward Drive
244	3.12	Hillingdon	Yeading Brook, Bulls Bridge
2861	3.20	Hounslow	Western International Market

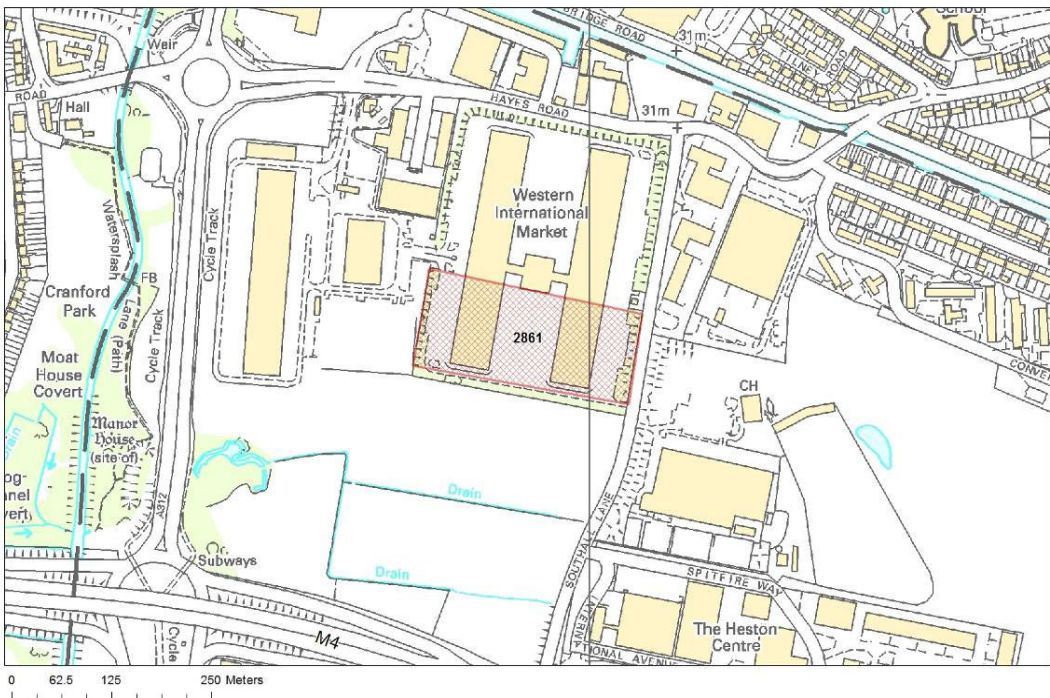
Site 222 Council Depot, Forward Drive, Harrow



Site 244 Yeading Brook, Former Powergen Site, Bulls Bridge, Hayes, Hillingdon



Site 2861 Vacant Site Western International Market, Hayes Road, Southall, Hounslow



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