

London Borough of Harrow



UNITARY DEVELOPMENT PLAN ADVISORY PANEL

TUESDAY 16 SEPTEMBER 2003
7.30 PM

PANEL AGENDA (ADVISORY)

COMMITTEE ROOM 5, HARROW CIVIC
CENTRE

MEMBERSHIP (Quorum 3)

Chair: Councillor Burchell

Councillors:

Idaikkadar N Shah Anne Whitehead (VC)	Marilyn Ashton Mrs Bath Harriss	(none)	(none)
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Reserve Members:

1. Blann 2. Bluston 3. Ray 4. Miles	1. Mrs Kinnear 2. Kara 3. Versallion	(none)	(none)
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Issued by the Committee Services Section,
Law and Administration Division

Contact: Rebecca Arnold, Committee Administrator
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**NOTE FOR THOSE ATTENDING THE MEETING:
IF YOU WISH TO DISPOSE OF THIS AGENDA, PLEASE LEAVE IT BEHIND AFTER THE MEETING.
IT WILL BE COLLECTED FOR RECYCLING.**

LONDON BOROUGH OF HARROW

UNITARY DEVELOPMENT PLAN ADVISORY PANEL

TUESDAY 16 SEPTEMBER 2003

AGENDA - PART I

1. **Attendance by Reserve Members:**
To note the attendance at this meeting of any duly appointed Reserve Members.
2. **Declarations of Interest:**
To receive declarations of personal and prejudicial interests (if any) from Members of the Committee arising from business to be transacted at this meeting.
3. **Arrangement of Agenda:**
To consider whether any of the items listed on the agenda should be considered with the press and public excluded on the grounds that it is thought likely, in view of the nature of the business to be transacted, that there would be disclosure of confidential information in breach of an obligation of confidence or of exempt information as defined in the Local Government (Access to Information) Act 1985.
- Enc. 4. **Minutes:** (Pages 1 - 6)
That the minutes of the meeting held on 10 July 2003, having been circulated, be taken as read and signed as a correct record.
5. **Public Questions:**
To receive questions (if any) from local residents or organisations under the provisions of Advisory Panel and Consultative Forum Procedure Rule 15 (Part 4E of the Constitution).
6. **Petitions:**
To receive petitions (if any) submitted by members of the public/Councillors under the provisions of Advisory Panel and Consultative Forum Procedure Rule 13 (Part 4E of the Constitution).
7. **Deputations:**
To receive deputations (if any) under the provisions of Advisory Panel and Consultative Forum Procedure Rule 14 (Part 4E of the Constitution).
8. **References from Council and Other Committees/Panels:**
To receive any references from Council and other Committees/Panels.
- Enc. 9. **London Plan EIP Panel Report and the main implications for Harrow:**
(Pages 7 - 12)
Report of the Chief Planning Officer
- Enc. 10. **Receipt of UDP Inspector's Report - Next Steps and Timetable to Adoption:** (Pages 13 - 20)

Report of the Chief Planning Officer

- Enc. 11. **Employment Land Study by Chesterton and Future Employment Policy in the Local Development Framework:** (Pages 21 - 38)
Report of the Chief Planning Officer
- Enc. 12. **Stanmore Hill Conservation Area Policy - Conservation Area Policy Statement:** (Pages 39 - 116)
Report of the Chief Planning Officer
- Enc. 13. **Little Common Conservation Area Policy Statement:** (Pages 117 - 192)
Report of the Chief Planning Officer

AGENDA - PART II - NIL

Proposed Officer Attendance at this Committee Meeting
Graham Jones-Chief Planning Officer
Bill Munro – Section Manager (Forward and Local Planning)
Jessica Farmer – Senior Assistant Solicitor (Planning)

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CABINET

VOL. 3 CUDPC 18

**UNITARY DEVELOPMENT PLAN ADVISORY
PANEL**

10 JULY 2003

Chair: * Councillor Keith Burchell

Councillors: * Idaikkadar * Marilyn Ashton
* N Shah * Mrs Bath
* Anne Whitehead * Mrs Kinnear (1)

* Denotes Member present
(1) Denotes category of Reserve Member

PART I – RECOMMENDATIONS

RECOMMENDATION 1: Draft Town Centre Development Strategy

Your Panel received a report of the Chief Planning Officer regarding the Draft Town Centre Development Strategy. It was explained that external consultants had been commissioned to prepare a strategy which examined the needs of the Town Centre holistically and proposed specific objectives which, together, would contribute to the overall aim of transforming Harrow Town Centre into a thriving, distinctive and adaptable centre, which would meet the long term needs of the community.

The key objectives identified by the draft strategy were:

- To promote activity in the centre that meets the needs of a modern economy and contributes to the overall aim of making Harrow special and distinctive.
- To ensure effective transport and pedestrian access to and within the centre.
- To make the centre look and feel attractive and safe.
- To celebrate the history, diversity and greenery of Harrow town centre.
- To make the centre feel more alive with people.
- To promote more community and civic activity in the centre.

The strategy set out measures to achieve each of these individual objectives and the officer report outlined possible sources of funding.

Members and stakeholders had been extensively involved in the production of the draft and it was now proposed that Cabinet agree the strategy for the purposes of consultation with the public and a wider range of organisations. Your Panel were invited to make comments on the draft strategy, prior to Cabinet's consideration of it. A consultant's brief in respect of Proposal Site Six (Harrow on the Hill Station) had also been drafted, with the aim of maintaining momentum in the future development of this site, and this was also to be submitted to Cabinet for approval. Your Panel's comments on this document were similarly invited.

During the debate which followed, the Panel raised, inter alia, the following issues:

- It was suggested that, in the section of the strategy which dealt with objective 2 (which referred to the need to ensure effective transport and pedestrian access to and within the centre), greater emphasis should be placed on the car parking needs of all town centre users, and not just shoppers.
- It was commented that, in the section of the strategy which dealt with objective 5 (which referred to the need to make the centre feel more alive with people) greater emphasis should be placed on the need to balance this objective with consideration for the amenity of nearby residents.
- It was suggested that, in the section of the strategy which dealt with objective 6 (which referred to the need to promote more community and civic activity in the centre), the importance of the Back History Month should also be highlighted and that greater reference be made to the Cultural Strategy.
- It was agreed that the questions for public consultation, as set out at Appendix 4 to the draft strategy, should be 'open-ended' and phrased in such a way as to encourage those consulted to provide detailed answers.
- It was pointed out that there was a minor factual error in Appendix 3 to the draft strategy – the change to Harrow's retail position should have read '-16' rather than '16'.
- Some concern was expressed regarding the relationship of the strategy to the deposit replacement Unitary Development Plan (UDP) and the fact that the UDP

- had yet to be finalised after receipt of the Inspector's report..
- Further concern was expressed that, when the strategy was sent out for consultation, the covering document emphasise the status of the strategy and be very clear that the proposals were by no mean concrete.

Arising out of the above discussion it was also requested that the forthcoming detailed traffic management study be presented to the Panel at its next meeting, prior to its consideration by Cabinet.

Following further discussion it was

Resolved to RECOMMEND:

To Cabinet:

That (1) the above comments regarding the draft Town Centre Development Strategy be forwarded to Cabinet.

[REASON: To progress the Town Centre Development Strategy in accordance with the Council's objectives for the environment and the economy]

and

To the Portfolio Holder:

(2) the forthcoming detailed traffic management study be presented to the Panel at its next meeting, prior to its consideration by Cabinet.

[REASON: To allow the Panel to input into the study].

RECOMMENDATION 2: 201-209 Northolt Road Development Brief

The Panel, at its meeting held on 3 February 2003, had previously considered a report of the Chief Planning Officer which had set out a draft development brief to guide future development on the above site (identified as Proposal Site 27 in the revised deposit Unitary Development Plan). The Panel had agreed the draft brief as a basis for consultation with interested parties. That consultation had now taken place and the Panel received a further report of the Chief Planning Officer which outlined the responses received and accordingly recommended a minor amendment to the brief to indicate that use of the site for affordable housing, either social rent or key worker accommodation, would be encouraged.

Following discussion it was agreed that the wording of paragraph 4.1 of the brief needed to be revised in order to remove any ambiguity.

Resolved to RECOMMEND: (To Cabinet)

That the draft development brief be adopted as Supplementary Planning Guidance to guide the future development of the above site, as attached to the officer report, subject to the amendment to paragraph 4.1 of the brief set out in the officer report and further consideration of its wording as set out above.

(Note: Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted against the adoption of the above draft development brief due to concerns regarding the building height and density which were indicated to be acceptable in paragraphs 4.2 and 4.3 of the brief).

[REASON: To assist in the implementation of proposals for the development of Proposal Site 27 in the emerging revised Harrow Unitary Development Plan].

PART II - MINUTES

38. **Appointment of Chair:**

RESOLVED: That the appointment of Councillor Burchell as the Chair of the Unitary Development Plan Advisory Panel for the 2003/2004 Municipal Year, as agreed at the Cabinet meeting of 20 May 2003, be noted.

39. **Attendance by Reserve Members:**

RESOLVED: To note the attendance at this meeting of the following duly appointed Reserve Member:-

Ordinary Member

Reserve Member

Councillor Harriss

Councillor Mrs Kinnear

40. **Declarations of Interest:**

RESOLVED: To note the following declaration of interest:

Agenda Item 12 – Draft Town Centre Development Strategy

Councillor Mrs Kinnear declared a personal interest arising from the fact that she lived very near the town centre, and accordingly she remained and took part in the discussion and voting on this item.

41. **Arrangement of Agenda:**

RESOLVED: That (1) the following late item be admitted to the agenda by reason of the special circumstances/reasons for urgency indicated;

Agenda Item

Special Circumstances/Grounds for Urgency

Item 12 – Draft Town Centre Development Strategy

This report is based on financial information which has only recently become available. Decisions are required now so that the activities outlined in the report can commence without unnecessary delay.

and

(2) all items be considered with the press and public present with the exception of the following item, for the reasons set out below:

Item

Reason

Schedules A and B to Item 12 – Draft Town Centre Development Strategy

Schedules A & B are listed under Part II of the Agenda by virtue of the fact that they contain exempt information, as defined under Paragraph 8 of Part 1 of schedule 12A to the Local Government Act 1972 (as amended) in that they refer to the amount of any expenditure proposed to be incurred by the authority under any particular contract for the acquisition of property or the supply of goods or services.

42. **Minutes:**

RESOLVED: That the minutes of the meeting held on 20 March 2003, having been circulated, be taken as read and signed as a correct record.

43. **Appointment of Vice-Chair:**

Councillors Marilyn Ashton and Anne Whitehead were both nominated and duly seconded for the position of Vice-Chair, and following a vote it was

RESOLVED: To appoint Councillor Anne Whitehead as Vice-Chair of the Unitary Development Plan Advisory Panel for the 2003/2004 Municipal Year.

44. **Public Questions:**

RESOLVED: To note that there were no public questions to be received at this meeting under the provisions of Advisory Panel and Consultative Forum Procedure Rule 15 (Part 4E of the Constitution).

45. **Petitions:**

RESOLVED: To note that there were no petitions to be received at this meeting under the provisions of Advisory Panel and Consultative Forum Procedure Rule 15 (Part 4B of the Constitution).

46. **Deputations:**

RESOLVED: To note that there were no deputations to be received at this meeting under the provisions of Advisory Panel and Consultative Forum Procedure Rule 14 (Part 4E of the Constitution).

47. **Mayor's London Plan:**

The Panel gave consideration to a report of the Chief Planning Officer regarding the Mayor's London Plan. The Panel had previously agreed two responses to the draft Plan at its meeting held on 24 September 2002 - one on behalf of Harrow, which had highlighted areas of particular concern to Harrow, and, additionally, a West London Borough's response which had addressed the sub-regional dimension of some of the issues. The Panel was now advised that, as a result, Harrow and the West London Alliance (WLA) had been invited to participate at the Examination in Public (EIP) which had been held during March and April. The EIP process and some of the topics discussed were outlined.

It was reported that it had been apparent that there were a number of key issues on which Boroughs and the Greater London Authority (GLA) differed and these had been discussed at length. The EIP Panel were to produce a report which was expected to become available in mid July and which would discuss these issues and accordingly make recommendations. The Mayor would consider the recommendations and it was expected that he would then move quickly towards adoption of the Plan. It was noted that there was no formal role for the Boroughs in this final stage, and during the discussion which followed, several Members expressed concern. It was noted, however, that, in the event that significant concerns remained unresolved, the Borough, the WLA and/or ALG could make representations to the GLA and/or the Government Office for London.

The report also advised that there had been a considerable amount of debate and concern both within and outside the EIP regarding the status, content and process for the preparation and agreement of Sub-Regional Development Frameworks. These Frameworks would provide planning guidance on issues which affected more than one Borough but which did not have a pan-London aspect and would help deliver the Mayor's London Plan. Elements of these concerns were outlined.

RESOLVED: That the contents of the report and the timescale for the adoption of the Mayor's London Plan be noted.

[REASON: To update the Panel on the London Plan and its implications for Harrow].

48. **The Changing Approach to Planning:**

The Panel received a report of the Chief Planning Officer which explained that, following an in-depth review of the planning system, and, in particular, the development plan system, the Government had recently published proposals for its reform under the Planning and Compulsory Purchase Bill. The report outlined the expected impact of the new system.

Under the new system local planning authorities would be required to draw up a Local Development Scheme, a three year project plan, which would set out:

- What Local Development Documents the Council proposed to prepare and what they would cover
- Which of these the Council proposed would be subject to statutory procedures and which would not
- In the transitional period, which sections of the UDP these documents would replace
- Whether any of these documents would be prepared on a joint basis with another planning authority
- The planned timetable for preparing these document.

Unitary Development Plans (UDP) would be replaced with Local Development Frameworks (LDF), which would consist of a core strategy, a proposals section with a proposals map, and area action plans for key areas of change or conservation.

The LDF, it was advised, was intended to be more concise and less repetitive than the UDP. The adoption process would also be less convoluted, standards of consultation would be explicitly set out and Inspectors' reports would be binding. The system as a whole aimed to be more efficient, provide greater local focus on policies and further

engage the community in developing policies.

The new system had originally been expected to come into force in Spring 2004, but advice recently received indicated that there might be a delay of some months. In response to a Member query it was explained that, assuming Harrow adopted its replacement UDP in February, the UDP would probably have a life of around three years before the Borough would be required to replace it with a LDF. It was noted that, as with consecutive UDPs, some of the content of the UDP would be 'adaptable' to the LDF.

Officers advised that the Authority had already begun planning for the transition to the new system. It was noted that demonstrating how the Authority intended to move towards implementing the new system would be a factor which would influence the level of Planning Delivery Grant the Council received in future years.

Officers emphasised that further reports spelling out the detail of the scope of the new regime would be forthcoming in due course. It was requested that future reports address the issue of any changes to the democratic processes in Harrow which might be required to facilitate the implementation of the new system, and the cost implications of the transition.

RESOLVED: That (1) the proposals for the reform of the current planning system, as outlined in the officer report, be noted; and

(2) officers be requested to prepare a further report on the approach to, and timetable for, the production of a Local Development Scheme (LDS) for Harrow, taking into account the requests above.

[REASON: To start preparations for the new system of local development frameworks].

49. **Draft Town Centre Development Strategy:**

Arising out of the discussion outlined at Recommendation 1, above, it was

RESOLVED: That details of the composition and status of the Council Steering Group referred to in the officer report be circulated to all Members of the Panel and Councillor Mrs Kinnear.

(Note: The meeting having commenced at 7.30 pm, closed at 9.20 pm)

(Signed) COUNCILLOR KEITH BURCHELL
Chair

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Meeting:	Unitary Development Plan Advisory Panel
Date:	16 September 2003
Subject:	London Plan EIP Panel Report and the main implications for Harrow
Key decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Portfolio Holder for Planning, Development, Housing and Best Value
Status:	Public
Ward:	All
Enclosures:	None

1. Summary/ Reason for urgency (if applicable)

- 1.1 This report examines the Panel Report of the Examination In Public on the draft London Plan in relation to the Council's concerns set out in its response. The report also notes the process of approval of the Plan from now on and the fact that there are no further opportunities for consultation.

2. Recommendations (for decision by the Executive)

- 2.1 **To note the response of the EIP Panel to Harrow's concerns over the draft London Plan and consider the need for any further representations within the constraints of the procedure for approval**

REASON: To update the Members on the London Plan

3. Consultation with Ward Councillors

- 3.1 None. A copy of the Panel Report has been placed in the Members' Library.

4. Policy Context (including Relevant Previous Decisions)

- 4.1 The Panel considered the Council's response to the draft London Plan at its meeting of 24 September 2002. A progress report, outlining the issues discussed at the Examination In Public, was presented to the Panel's meeting on 10 July 2003.

5. **Relevance to Corporate Priorities**

- 5.1 The London Plan, once approved, will replace Strategic Planning Guidance for London Planning Authorities (RPG3) and so become the main regional framework document for the Harrow UDP; the UDP will need to be in general conformity with it. The London Plan will therefore be setting the regional context for a key part of the Council's planning strategy, and relates closely to several of the Council's strategic corporate objectives, particularly those concerning enhancing the environment and developing a prosperous and sustainable economy in Harrow.

6. **Background Information and options considered**

- 6.1 The report of 24 September 2002 had as its Conclusion seven bullet points which summarised the Council's concerns (printed in italics below). These will be reviewed in turn against relevant findings in the Panel Report on the Examination In Public (EIP).

- 6.2 *Growth assumptions – the figures underpinning the growth assumptions need to be rigorously tested; it is unclear how West London in general and Harrow in particular can accommodate and manage growth in advance of infrastructure improvements*

The Panel Report notes that "the overall level of economic growth was hardly arguable as it was generally in line with Government forecasts. Unlike those forecasts, however, the [London] Plan is looking to a 15 to 20 year timescale, and this gave rise to questions about the cumulative growth profile and the realism of expectation about jobs." But, despite recent slowdown in employment and current over-supply of office space, the Panel "do not call into question the long term direction of the Plan."

2001 Census data, released in September 2002, showed 220,000 fewer people in London than had been assumed when the draft London Plan was prepared. This, with further data released in February 2003, prompted new projections from the Mayor which revised the expected growth in households between 2001 to 2016 down from 311,000 to 299,000. However, the difference when calculated on an annual basis amounts to 800 households and GOL concluded that a working assumption of annual household growth of 20,000 across London was reasonable, and the Panel concur. Their conclusion is that the Plan's assumptions on population and household growth in London are robust.

On transport infrastructure and larger developments, the Panel note that the relevant policy in the London Plan "envisages that development could take place where existing transport capacity was not sufficient to allow for the travel generated by the development, provided there were firm plans for an increase in capacity to cater for it. We note that a policy along these lines would accord with Government guidance in PPG13." In addition, the Panel have asked for a new policy setting out the phasing of transport investment, distinguishing those schemes that the Mayor can deliver, and have a high certainty, from those outside his control; details of the resources and timing of the Mayor's schemes are to be given.

- 6.3 *Cricklewood/Brent Cross – a regional shopping centre with a wide, largely car-borne, catchment will not be easily integrated into the Cricklewood redevelopment and will remain essentially a car-borne shopping centre and will therefore not complement the roles of other centres such as Harrow but rather undermine their vitality and viability*

The Panel consider that the Plan takes broadly the right approach on the Cricklewood / Brent Cross opportunity area and that "Brent Cross will, over time, evolve from its current

role solely as a retail centre.” The Panel recommend classifying Brent Cross uniquely as a ‘regional shopping centre’ (as it was in RPG3) but says that its future role “is unlikely to be determined without a detailed and comprehensive retail study, and it would not be appropriate to suggest what that role should be in advance of that.” On Cricklewood itself, the Panel note the competing demands for the land including the possible need for freight terminals, but then says that “Decisions as to the appropriate future use of the Cricklewood railway lands are a matter for the Sub Regional Development Framework.”

6.4 *Housing supply – borough targets now include vacant property and non-self contained housing with no explanation, and the resource implications for the boroughs in monitoring all aspects of housing supply should at least be acknowledged*

The Panel note that some boroughs were concerned about their borough housing provision figures: while 17 of 33 boroughs accept their London Plan target figure, 10 boroughs now consider a lower figure appropriate and 2 also apparently envisage lower provision; 4 boroughs gave no information. Among the main reasons why some boroughs want lower figures the Panel mention the issue raised by Harrow – “concerns over allowances for vacancy reduction, conversions and non-self contained accommodation”. The Panel’s conclusion was that the Housing Capacity Study on which the future provision figure was based “no longer provides a reliable measure of the capacity for providing new housing in London over the period to 2016, or an appropriate set of 15-year targets for Boroughs”. They then recommend that the Plan include a paragraph setting out clearly the approach and timetable for carrying out the new housing capacity and feeding the results into the policy review process. Until the new capacity study is completed, the annual target will remain at 23,000 additional dwellings, but by 2006 this will be reviewed with the aspiration of raising it to 30,000 depending on the results.

6.5 *Affordable housing – recognition of local circumstances is needed, and guidance given on priorities between, for example, key workers and homeless households; 50% provision on private residential developments conflicts with current UDP policy, and in any event a prescribed percentage across London is inflexible. This should be a matter for UDPs.*

The Panel conclude that in the context of their proposal “for an overall target of 30,000 additional homes per year, a target for providing 50% of affordable housing could be justified on the basis of the scale of housing need in London as a whole. We further conclude that, given a broad, inclusive definition of affordable housing, including intermediate housing, the achievement of such a target is reasonably practicable, subject to a number of conditions”. For instance, it will be sought from all sources and not just from S.106 proposals, comprising all types and tenures of housing within the definition. It will include 100% affordable schemes carried out by RSLs. The Panel state that student housing falls within the scope of the definition. It will also include the contribution from reducing vacancies and from non-self contained accommodation of which the Panel say, “most if not all of which would be affordable”. “On this basis a 50% target would in practice mean the contribution expected from general housing developments would be less than 50%.”

As far as affordable housing targets for individual boroughs are concerned, which were included in a table in the draft London Plan, the Panel say: “In our view including a table of percentages, whether labelled targets or benchmarks, implies a policy choice having been made in favour of those percentages even though they represent a theoretical assessment...rather than policy decisions about the appropriate level of affordable housing to be sought in each Borough.” The Panel then recommend making the borough

targets policy less prescriptive including the deletion of the table of individual borough percentages.

- 6.6 *Density location and parking matrix – residential density levels should be locally determined and individual proposals should reflect a design-led approach to development so as not to undermine local character or conflict with the wider objective of enhancing the quality of life in suburban London*

The Panel's strong view is: "Overall we consider that the density matrix....provides a suitable broad range. The lowest value, 30 units per hectare in suburban locations, is no higher than the minimum suggested in PPG3....We can see no justification for lower densities for new development in outer London than those being achieved in the districts beyond. The ranges for suburban locations are upwards from 30 u/ha, and we would expect that most development in London should be well off the bottom of the range."

- 6.7 *Wealdstone District Centre – the centre should be reclassified from Neutral/Trend to Regeneration*

The Panel recommend that the 'policy theme' column, which included the above-mentioned classifications, should be removed from the Plan as current policies for the future development of these centres are reflected in UDPs.

- 6.8 *Harrow Metropolitan Centre and the West London sub-region – Harrow-on-the-Hill Station site's strategic development potential and the development opportunities in the Town Centre generally should be acknowledged in the Plan and Harrow Town Centre re-designated for development intensification*

The Panel Report makes no specific reference to Harrow Metropolitan Centre and this particular issue. However, it does note that "We consider that the draft Plan underplays the interconnected nature of London's economy, and the cumulative scale of the opportunity presented by London's town centres and suburbs....Overall the average population of the London Boroughs at 2001 was some 224,000, the equivalent of 33 cities each the size of Derby, intimately packed together into a contiguous urban space. Despite this, and the role of the 10 Metropolitan Centres and other major employment locations, there is a tendency to see 'suburban London' as ancillary to the Metropolis, rather than an integral part of the urban system. Against this background, we appreciate the view that the Plan needs to take a more positive approach to the role of inner and outer London centres in the overall economy." Following on from this, the Panel support the Mayor's suggestion of inserting a new policy on town centres, which is understood to give greater prominence to the role of town centres – no details of this policy are given.

Turning to West London, the Panel made some general criticisms of the sub-regional development frameworks process. In particular, noting that they will contain new policy or additions to policy in the Plan, it would not be appropriate to call them SPG or other 'informal' documents, but rather to incorporate such policy content as an alteration at the First Review.

Next Steps

- 6.9 Having received the Panel Report, the Mayor for London needs to consider the report, take account of it in making any further changes to the London Plan, and – subject to any direction by the Secretary of State – publish the final Plan. The Secretary of State has 6 weeks, or longer if needed, to decide on whether to issue a direction. There is no requirement for further consultation between the Mayor and the boroughs or any other party, and indeed none will take place. The approximate timetable anticipated for these stages is that the revised London Plan will be sent to the Secretary of State (the Deputy Prime Minister), via GOL, at the beginning of October and the DPM will be offered 2

months to comment the Plan. Assuming the DPM issues no direction or does not require an extension of time to consider it, the London Plan will then be published by the Mayor before the end of December this year.

7. **Consultation**

7.1 None (see 6.9 above).

8. **Finance Observations**

8.1 No comment.

9. **Legal Observations**

9.1 None.

10. **Conclusion**

10.1 This report has focused on those aspects of the Panel Report which cover Harrow Council's response on the draft London Plan. Overall, the Panel largely supported the Plan as drafted: "In most respects the Mayor's policies have been endorsed through the process and the changes represent clarification or strengthening in the light of the issues raised."

11. **Background Papers**

11.1 Draft London Plan, Examination in Public – Panel Report, July 2003

11.2 The draft London Plan – Draft Spatial Development Strategy for Greater London, Mayor for London, GLA, June 2002

12. **Author**

12.1 Bill Munro, ext 2457, [bill.munro@harrow.gov.uk/](mailto:bill.munro@harrow.gov.uk)

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Meeting:	Unitary Development Plan Advisory Panel
Date:	16 September 2003
Subject:	Receipt of UDP Inquiry Inspector's Report – next steps and timetable to adoption
Key decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Portfolio Holder for Planning, Development, Housing and Best Value
Status:	Public
Ward:	All
Enclosures:	Appendix 1: the Inspector's covering letter

1. Summary

- 1.1 The Inspector's Report into representations made to the draft replacement Harrow UDP has now been received. The Report contains 239 recommendations and the Council must now consider its response to each of these and publish the response and any resulting modifications before it can complete the steps leading to adoption of the new plan. This report comments briefly on the Inspector's Report, outlines the next steps and the anticipated timetable up to adoption, refers to the parallel process of approval of the London Plan and comments on implications of the new Local Development Framework.

2. Recommendations (for decision by the Executive)

- 2.1 To note receipt of the Inspector's Report on objections to the draft replacement Harrow UDP, and
- 2.2 To agree a timetable leading to adoption of the Plan by mid-2004

REASON: To expedite adoption of the replacement Harrow UDP after completion of all statutory procedures

3. Consultation with Ward Councillors

- 3.1 None. A copy of the Inspector's Report has been sent to all Members of the Panel.

4. Policy Context (including Relevant Previous Decisions)

- 4.1 The public local inquiry in February and April this year was into objections made to the draft replacement Harrow UDP. The first deposit version of the replacement HUDP was

considered by the Panel on 15 May 2001; the second deposit version was considered by the Panel on 29 January and 7 February 2002 and approved by Cabinet on 26 February 2002. The Panel also considered pre-inquiry changes to the second deposit version on 19 September 2002 and 3 February 2003.

5. **Relevance to Corporate Priorities**

- 5.1 This report concerns the Council's statutory development plan, the UDP, and as such it fundamentally concerns the Council's stated priority of enhancing the environment of the borough.

6. **Background Information and options considered**

The Inspector's Report

- 6.1 The report of the Inspector contains 232 pages and has 239 recommendations (for comparison, the 1994 report on the adopted HUDP had 363 pages and 229 recommendations). Of the 239 recommendations, 152 are to recommend no modification to the plan, leaving 87 where the Inspector recommends some change. A copy of the Inspector's covering letter to his report is attached which gives a brief overview of his comments on the HUDP. Members will note his particular concerns over the policies for housing, particularly affordable housing, parking standards, and the BAE Systems site.
- 6.2 The report is made to the Council as local planning authority and the Council is required to consider the report, to decide what action to take on each of its recommendations, and to state its reasons for those decisions. In addition, it must prepare a list of proposed modifications it intends to make to the plan and its reasons for proposing them. This list will primarily stem from decisions on the Inspector's recommendations but can also include appropriate changes to reflect government guidance and policy statements issued since the plan went on deposit.
- 6.3 In deciding on the Inspector's recommendations, the Council still has discretion whether to accept them or not (this discretion is proposed to be taken away for the new style of development plans currently going through Parliament). "Although authorities will wish to accept the Inspector's recommendations in most cases, they are not obliged to do so" (Local Plans and Unitary Development Plans, a guide to procedures). However, "Where the local authority choose not to accept a recommendation, they must provide clear and cogent reasons for not doing so. An objection can still be made not to accept an Inspector's recommendation" (PPG12, Annex B).
- 6.4 The Council's decisions on all the recommendations and the proposed modifications to the Plan (including pre-inquiry changes to the plan which have been upheld by the Inspector) will need to be placed on deposit. Objections can be made and the Council will need to consider these before moving on to complete its adoption. If objections raise new issues a further public inquiry might be justified but this is not generally the case.

The London Plan and the conformity issue

- 6.5 Under the Greater London Authority Act 1999, the UDP must be "in general conformity with the spatial development strategy for the time being in force" (Section 344). This means that once the London Plan is finally published (scheduled for December 2003) the replacement HUDP will need to be able to demonstrate that it is in general conformity before the Council can complete the adoption process. The practical consequences of this are currently being discussed with the Mayor's Office and with Government Office for London. We will need to be aware of the Mayor's views on issues in the HUDP which he

considers might not be in general conformity with the London Plan before detailed responses to the Inspector's recommendations can be agreed.

Timetable to adoption

- 6.6 A suggested timetable is set out below. This provides time to prepare and consider the Council's response to the Inspector's recommendations and to complete all the statutory procedures, avoids use of the Christmas holiday period for the deposit stage which can give rise to complaints, and allows time for the issue of general conformity to be resolved at the same time as the London Plan is being finalised. The timetable does not allow for a second inquiry which might prove necessary if new issues are raised by objections to proposed modifications.

Consideration of Inspector's recommendations (over 2 or more Panel meetings)	UDP Panels	? Nov 03 4 Dec 03
Agree resultant modifications to the UDP	Cabinet	13 Jan 04
6-week deposit of decisions and modifications		Jan-Feb 04
Scrutiny of UDP	E & E Scrutiny Sub	11 Mar 04
Consideration of any objections arising from deposit	UDP panel	18 Mar 04
Recommend adoption of replacement HUDP	Cabinet	20 Apr 04
Decision to adopt replacement HUDP	Full Council	29 Apr 04
Serve notice of disposition to adopt		May 04
Adoption on expiry of 6 weeks		June 04
Printing and publishing of replacement HUDP (after expiry of 6-week High Court challenge period)		July 04

Implications for Harrow's Local Development Framework

- 6.7 Legislation for the new system for development plans is currently going through Parliament and commencement of the new provisions is anticipated to be in June/July 2004. If this timetable is achieved, this means that by June/July 2007 Harrow's new Local Development Framework would need to be in place in some form and the new HUDP would then cease to be part of the development plan. Up to that point, it can remain Harrow's development plan.

7. Consultation

- 7.1 Copies of the Inspector's Report will be printed and will be made available to all objectors and supporters, any other interested parties and placed at all previous deposit points.
- 7.2 Once all recommendations have been decided on and all the proposed modifications have been agreed, the Council's statement of decisions and list of proposed modifications must be placed on deposit for a statutory six-week period, in the same manner as the first and second deposit versions of the plan. This deposit period must be advertised and objections or statements of support can be made.

8. Finance Observations

- 8.1 Costs associated with the procedures for adopting the replacement HUDP can be met from existing budgets. No other financial comments.

9. Legal Observations

- 9.1 No comments.

10. **Conclusion**

- 10.1 Receipt of the Inspector's Report is an important stage in the process towards adoption of the new UDP. The weight attached to the plan by appeal inspectors will now increase for those policies not objected to or where he has recommended in favour on policies which had brought objections. The remaining policies, which are subject to his recommendations to make changes, must now be addressed so that the procedures towards adoption can be completed without delay but thoroughly.

11. **Background Papers**

- 11.1 Inspector's Report on Replacement Harrow UDP, The Planning Inspectorate, 13 August 2003.

12. **Author**

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The Chief Executive
London Borough of Harrow
Civic Centre
Harrow
Middlesex
HA1 2UY

Your ref:

Our ref: PINS/M5450/539/2

Date:

Dear Madam

Replacement Harrow UDP

1. On dates from 4-19 February and 14-15 April 2003 I held a public inquiry at the Civic Centre, Harrow into objections to the UDP. I also made site visits, both accompanied and unaccompanied, before, during and after the inquiry.
2. Following the current statutory process, the First Deposit Draft was placed on deposit for a six weeks period of consultation commencing on 28 June 2001, and attracted 955 objections, of which 224 were withdrawn. The Revised Deposit Draft was placed on deposit for six weeks on 21 March 2002 and attracted 146 objections, of which 42 were conditionally withdrawn. A number of pre-inquiry changes have been proposed and advertised.
3. As a result, and allowing for other variations in the ongoing figures, I have considered and reported on a total of 839 objections, of which, as a matter of record, 84 were heard at the inquiry and 755 proceeded as written representations. The distinction does not affect the weight I have accorded to either class of objections.
4. My report is attached. It is to be taken as definitive, but it may be helpful if I draw attention here briefly to some of its issues and findings, by reference to relevant Plan chapter headings:-

INTRODUCTION AND STRATEGIC CONTEXT

5. Since "sustainability" is expressed, quite properly, to be at the core of the Plan, I recommend a more detailed definition at the outset of what the UDP means by this often misunderstood, and sometimes misused, term. The issue of housing provision is plainly important, for Harrow and in the wider, regional, context. I advise on a clearer definition of aim for the Part I housing Policies, in the light of that context.

ENVIRONMENTAL PROTECTION AND OPEN SPACE

6. This is, necessarily, a very wide ranging chapter of the Plan. On the broader level, I express the view, in relation to the relevant Policy, that open space and recreational facilities cannot always be kept as they are. Planning has to weigh sometimes conflicting considerations, and there may be

circumstances where development should be entertained on such land. I advise accordingly. At site specific level, I deal with the merits of possibly releasing certain areas of land from Green Belt or Metropolitan Open Land designations.

DESIGN AND THE BUILT ENVIRONMENT

7. The Plan clearly demonstrates the Council's aim to adopt an approach to design more in tune with current thinking and policy, to replace the application of more prescriptive rules for assessing quality and suitability of development proposals. In dealing both with this Chapter and some other Policies elsewhere, I have found provisions which I recommend could be altered or deleted, further to promote the changed attitude.

TRANSPORT

8. There has long been the recognition that decisions, choices and initiatives taken and made in this area fundamentally shape the pattern of development, our environment, and indeed our society. Very positive government policy has been promulgated in recognition of that fact and cascaded down to all levels of decision taking, to promote a national, even international, strategy. A local and significant implication for Harrow is parking provision. I do not consider the Plan reflects the applicable guidance, and I have sought to indicate how, and what should be done to change that.

HOUSING

9. I advise on the importance of the Plan setting out what provision can and should be made, over its allotted lifetime in this respect, in a more clearly expressed framework of calculations relating to need and demand, likely supply of land and other resources such as buildings for conversion, and quantifiable constraints. The advancing authority of the London Plan may enable this exercise to be conducted with more certainty than hitherto.
10. I recommend a more measured and comprehensive approach to affordable housing provision, justified in the context of the overall assessment of needs and opportunities, rather than appearing to reflect a desire simply and exclusively to increase the Borough's stock of family housing to rent.
11. My appreciation of the need for Harrow to make the maximum possible contribution to combating the existing, and potentially increasing, housing shortage in the Capital suggests that all unnecessary barriers in the way of meeting this objective should be removed. I put in that category, e.g., requiring more parking than developers may wish to provide, indicating maximum allowable densities, and preset limits on percentage of flat conversions in a particular road.

EMPLOYMENT, SHOPPING AND TOWN CENTRES

12. The bulk of my task was to recommend what might substantially be seen as drafting amendments to various UDP Policies. In site specific terms, I see no prospect that the BAE Systems site at Warren Lane, Stanmore, soon to be vacated, will offer a significant resource as employment land, whereas it can, I am sure, contribute needed housing provision. I recommend accordingly, taking due account of the site location in relation to Green Belt and other relevant designations.

RECREATION, LEISURE AND TOURISM

13. I found this a relatively uncontroversial area, in policy terms. Objectors expressed concerns as to a variety of issues, in some cases of what I describe as an "operational" nature, beyond my remit in advising what might be appropriate for the UDP to address.

COMMUNITY SERVICES AND ACCESSIBILITY

14. I comment that this is an area where, particularly, the UDP manifests a not unfamiliar wish to have Policies on a whole variety of subjects seen as within the scope of the chapter title. That is not to minimise the importance of some of the topics addressed. However, I have adopted a critical

attitude, and recommended the deletion of those Policies which appear not to be justified as land use based instruments of specific relevance.

IMPLEMENTATION RESOURCES AND MONITORING

15. I have seen the need only to recommend the removal of the specific Policy proposed for seeking developer contributions to education provision, as in part superfluous and in part contrary to Circular advice.

OTHER MATTERS

16. I have considered also a number of objections lodged to other parts of the Plan, beyond its named chapters. Mostly, these relate to specific sites. Included is the possible central redevelopment, which might affect, amongst others, the Harrow Baptist Church, Royal Mail and Harrow College. I have indicated some concerns I wish to express about such a scheme, but in the circumstances I detail, including the absence of full argument before me on matters raised, I have made no recommendation.

17. If current Government policy, as evidenced in Planning Policy Guidance Notes, Circulars or otherwise, changes before the adoption of the Plan, the Council will need to consider whether further modifications are necessary.

18. A copy of this letter has been sent to the GO-London and to the ODPM.

Yours faithfully

J M Turner LLB Solicitor
Inspector

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LONDON BOROUGH OF HARROW

Meeting:	UDP Advisory Panel
Date:	16 th September 2003
Subject:	Employment Land Study by Chesterton and Future Employment Policy in the Local Development Framework
Key decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Portfolio Holder for Planning Development, Housing and Best Value
Status:	Part I
Ward:	All
Enclosures:	Appendix 1: Conclusions and Recommendations, from Employment Land Study, Chesterton, November 2002

1. Summary

- 1.1 Chesterton plc were commissioned by the Council in June 2002 to produce a study of the supply and demand for employment land and premises in the Borough. This report summarises their findings. Their work highlighted the shortage of good quality industrial land in the Borough in the light of local demand, particularly expansion space for existing employers and low-cost accommodation for business start-ups. The report then discusses the consequences of the specific location-based recommendations in the Chesterton Study – South Harrow, Wealdstone and the Kodak site. Finally, the work that will be required in this topic is outlined in the context of the proposed Local Development Framework.

2. Recommendations (for decision by the Executive)

2.1 Members are recommended to:

(i) note the findings of the Employment Land Study prepared for the Council by Chesterton, especially the strong message that there is a need to continue to protect land and premises in employment use, given frustrated demand in the Borough

(ii) agree to the preparation of masterplans/Area Action Plans for the Northolt Road, South Harrow Business Use Area and the western part of Wealdstone Industrial & Business Use Area.

(iii) note the changes to the nature of employment policy that will need to be considered as part of the process of moving towards the Local Development Framework.

REASON: To support employment land policies in the Harrow UDP and give direction to further policy development and site specific work.

3. Consultation with Ward Councillors

3.1 None. A full copy of the final study has been placed in the Members' Library.

4. Policy Context (including Relevant Previous Decisions)

4.1 The revised deposit draft of the replacement Harrow UDP was considered by the Panel on 29 January and 7 February 2002 and approved by Cabinet on 26 February 2002.

5. Relevance to Corporate Priorities

5.1 This report addresses the Council's stated priorities of enhancing the environment and developing a prosperous and sustainable economy in the borough.

6. Background Information and options considered

The Chesterton Study findings and recommendations for action

6.1 Chesterton were commissioned by the Council in June 2002 to produce a study of the supply and demand for employment land and premises in the Borough. As well as assessing overall quantitative and qualitative demand for industrial and office floorspace, the Consultants were asked to look at the demand for low-cost accommodation for business start-ups and the demand for work/live units. On the supply side, they were asked to assess the major industrial sites of the Borough in terms of their marketability, and the future viability and attractiveness of the office centres of Harrow and South Harrow.

6.2 The Consultants provided their views on the policies within the draft Replacement Harrow UDP. They were supportive of the Council's policy stance, with regard to the need to protect the limited employment land the Borough has, whilst making recommendations concerning certain areas. As a result, the Study was used as supporting evidence at the Public Local Inquiry into the Replacement UDP, held in February and April of this year. It has also helped to inform policy observations made on

key planning applications, particularly those that involve the loss of an existing employment use.

6.3 The key findings of the Study are as follows:

- There is a strong demand for industrial premises and a limited stock in the Borough help to keep rental values/investment yields buoyant. More industrial floorspace needs to be developed in the Borough.
 - Harrow has one of the highest business start-up rates in the country, a growing population of well-educated school leavers, and a large ethnic minority base with a good entrepreneurial tradition.
 - There is frustrated demand for small units for these business start-ups – low cost managed workspace, serviced offices and work/live units, with business support services. The New Media Knowledge Centre and Business School at the University of Westminster Harrow Campus help to provide a stream of entrepreneurs for these.
 - Expansion space for existing employers in the Borough is in short supply, which could lead to some needing to consider relocating out of the Borough in the future. This could have serious consequences for local employees and for the local economy.
 - Harrow is not a major office centre in the West London context, and apart from low-cost serviced accommodation there will continue to be limited demand for officespace. This will result in a continuing oversupply, particularly of older offices that cannot be economically upgraded to meet modern standards.
 - Harrow Town Centre needs to be promoted as a location with good access to Central London, Heathrow and the City.
 - Chesterton endorse the Council's employment policies and in particular the protection of the Borough's employment sites. They are all, with one or two exceptions, considered to be marketable. In particular, the Brember Road/TXU/Biro House site and Government Offices, Honeypot Lane "offer realistic and achievable market opportunities to enhance the industrial offer in the Borough".
 - The retention of the BAE Systems site, Stanmore for employment use is supported, looking at the 15 year lifetime of the Plan, rather than the short term. The future of this site was the subject of a formal hearing at the Public Local Inquiry into the Replacement UDP earlier this year.
- 6.4 Chesterton made recommendations with regard to three locations within the Borough – the Northolt Road Business Use Area in South Harrow, the Palmerston Road/Oxford Road Industrial Area in Wealdstone, and the Kodak site.
- 6.5 They recommended that the northern part of the Northolt Road Business Area (north of the Waitrose roundabout) should be removed from Policy EM14 (which protects the office blocks in B1 use). This area would thereby be made subject to general Policy EM16 which allows employment land and premises to go to other uses, including mixed uses, if a number of criteria are met. The justification for this recommendation is the 'overhang' of office premises vacant, or becoming vacant, in South Harrow, much of which is not suitable for upgrading to modern standards. The southern half of Northolt Road would still include major occupiers such as Bovis Lend Lease, AON, and Siemens.
- 6.6 The Palmerston Road/Oxford Road area, Wealdstone, whilst generally enjoying low vacancy rates, would also benefit from renewal of the stock. Chesterton recommend that the area west of George Gange Way, which more readily links to Wealdstone High Street, could form part of a Wealdstone regeneration area and should be the subject of a masterplan. They suggest the creation of a mixed use area with residential, retail and managed affordable offices/workspace to cater for local demand.

- 6.7 The Study also recommended the creation of a clear strategy for the future should parts of the Kodak site come forward for redevelopment, although there are no such plans at present. Such a strategy would need to ensure that any redevelopment was linked to the Waverley Industrial Estate, Hailsham Drive.

Implications for Harrow's employment policies

- 6.8 Harrow's UDP Employment policies were largely endorsed by Chesterton. Their work and recommendations underline the need to carefully assess any proposal to change land or premises away from employment use to another, such as residential. Given frustrated demand for business start-ups and small businesses that are growing, it is imperative that land and premises in designated employment areas are retained in that use.
- 6.9 For sites in employment use but not in a designated area, a careful consideration needs to be made as to whether an employment use meeting local needs could possibly be developed there. For example, where there are currently vacant offices, could these be adapted for work/live units, or small suites of managed office space mixed with residential rather than simply the entire block being converted to housing? Demolition of the office block and its replacement with workshops (and some residential units to "enable" the development) or a similar type of option should also be considered, and only if all viable options are explored should loss from employment use be allowed.
- 6.10 The above needs to be borne in mind in deciding what might be the best option for South Harrow in the future. There is no doubt that some of the current office accommodation in South Harrow is unlikely ever to be let, and there is probably a case for allowing a reduction in the total office stock here. In employment terms, some of the redundant officespace should be replaced by new employment floorspace.
- 6.11 It is clear that a more proactive policy approach for the whole of the Northolt Road Business Area is needed. The only further changes to the Plan that can be made at the post-inquiry stage are those in line with the Inspector's recommendations. The Inspector may recommend changes to Policies EM14 or EM16, or to the whole approach to protecting employment land, and then there may be some scope for altering the UDP to reflect a more proactive approach tailored to South Harrow. However, if he does not recommend any changes, it is considered important that work begins at an early stage to produce further guidance for developers in this area.
- 6.12 South Harrow is the second most important office centre in the Borough, and it is important to ensure that this centre meets future employment needs. It is therefore considered that a reactive policy that only deals with individual properties when they are brought forward for development is not sufficient. The northern part of the Business Area, at least, should be the subject of a proactive masterplan approach that sets out what the Council wish to see in this area. The area is adjacent to the Brember Road/Biro House/TXU site which is a Proposal Site in the Replacement UDP.
- 6.13 A co-ordinated approach to planning the whole of this area of South Harrow for employment purposes would therefore be logical. Despite the fact that the UDP has not yet been adopted, it would be prudent to produce some detailed guidance for this area as soon as possible, given the vacancy rates and increasing pressure to redevelop office blocks along Northolt Road. Such a masterplan should identify different parts of the Business Use Area suitable for different uses, which may include enabling development,

(as discussed in para. 4.2 above) and mixed use development as well as appropriate single employment use floorspace.

- 6.14 In Wealdstone, Chesterton recommend a masterplan approach to that part of the Industrial & Business Use Area west of George Gange Way. This approach would also be applicable here. This area is also within the designated Wealdstone District Centre, and therefore a variety of town centre uses is appropriate. Mixed uses would be appropriate, including, of course, employment generating ones such as workshops/small office suites to complement retail and housing. It should be recognised, however, that the older premises in this area constitute a resource of low cost commercial premises, and replacement buildings, though newer and better suited to modern needs, may not be as attractive to present occupiers at higher rents.
- 6.15 With regard to the Kodak site, Chesterton recommend that a strategy should be put in place to cover the eventuality of parts of the site becoming vacant. However, further guidance would be premature because it is not known if any parts of the site are likely to become vacant. It is considered that the UDP Policy EM15 provides the starting point – protection for employment use – from which a detailed development brief for any employment site could be produced in the event of any major land release.

Towards the Local Development Framework

- 6.16 Members of the Panel received a report at their 10 July 2003 meeting on the fundamental changes to the development plan system which will result from the Planning and Compulsory Purchase Bill. Not only will Councils have to produce new Local Development Frameworks (LDFs) but also policies will need to reflect the concept of spatial planning. This means that policies will need to take into account a wider range of considerations than simply land use planning. In particular, policies must tie in more closely to wider aims, such as regeneration and social inclusion, and address the needs of the Borough.
- 6.17 With regard to employment, land and premises provision should tie in as much as possible to the needs of local businesses and employers, and also allow businesses that reflect the skills of the local workforce to begin trading. Chesterton highlight the lack of start-up premises for entrepreneurs in the New Media Knowledge and other latest technology industries, and also the lack of expansion space for existing businesses.
- 6.18 Chesterton also highlight the economic structure of the Borough, and the sectors where the number of employees in Harrow is higher than the London and West London averages. These sectors are: Manufacturing, Construction, Education, Health & Social Work and Financial Intermediation. Some of these sectors tend to occupy “traditional” B Use Class premises (B2 for manufacturing, B1 for financial intermediation) but clearly the Education and Health sectors do not always do so.
- 6.19 LDF policies will need to be integrated, cross-disciplinary and link in to the spatial needs of employers, some of whom are the Council’s partners in the Harrow Strategic Partnership. To do this, it is suggested that in the development of LDF policies a broader definition of employment be used. This should include the Education and Health sectors as acceptable users of land and buildings protected for employment use. However, there would have to be evidence of job creation/preservation to justify a change. But with the Government proposing changes to PPG3 (“Supporting the Delivery of New Housing – Consultation Paper” ODPM, July 2003) that will further encourage the change of use of

employment land to housing, justifying the need to retain sites for any form of employment use will, in any case, soon become the norm.

6.20 Protection of amenity for surrounding occupiers to the site, especially householders, will also need to be considered, since some Education or Health uses, particularly large-scale ones, may not sit happily with residential use due to noise or traffic movements. It is not recommended that retail or leisure uses be afforded the same flexible treatment, despite their potential to create jobs, because their impact can be much greater - for example, late night opening and traffic movements are much more likely with this type of development.

6.21 The 'Area Action Plan' is a constituent Document within the LDF. Whilst the details of this new document are not yet finalised, it may be that a future statement of the policy stance for South Harrow and Wealdstone, as discussed above, would most appropriately be in this form. The early production of a masterplan should at least be compatible with the Action Area Plan format as far as this is currently known.

7. **Consultation**

7.1 Modifications to the replacement Harrow UDP made in response to the Inspector's report will be subject to formal deposit procedures and any objections will be considered by the Panel. Preparation of the Local Development Framework in subsequent years will be subject to a new style of consultation procedures, requiring its own statement of community involvement.

8. **Finance Observations**

8.1 No financial comments

9. **Legal Observations**

9.1 None

10. **Conclusion**

10.1 This report and the consultants' study on which it is based should be viewed in the context of the Inspector's recommendations with regard to employment policy and sites designated for employment use. The future direction for policy development and site-specific work will need to be reviewed under the new Local Development Frameworks.

11. **Background Papers**

11.1 Employment Land Study, Chesterton for London Borough of Harrow, November 2002

12. **Author**

12.1 Glenn Jones

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8 CONCLUSIONS AND RECOMMENDATIONS

8.1 INTRODUCTION

In this final section of the report, we highlight the key findings from our work before specifically responding to the aims of the project brief, namely:

- To assess the quantitative and qualitative need for industrial land in the Borough over the next 10-15 years;
- To assess the demand for starter units/low cost accommodation by type of unit - office, workshop, light industrial etc.;
- To assess the major industrial sites in terms of their marketability were they to become vacant, and the supply required to maintain/enhance Borough employment;
- To assess emerging trends and demand for live/work units, including locational requirements for such developments;
- To assess the demand for and supply of office accommodation considering the future suitability and viability of office blocks in Harrow and South Harrow, market perceptions of Harrow as an office location and the potential impact of Crossrail.

At the end of the section, we provide brief commentary on the policy implications of our work.

8.2 KEY FINDINGS

The Local Economy

- 8.2.1 Harrow continues to be an attractive place to live and work. The Borough has experienced some growth in businesses and employment during the last five or so years. The majority of this employment growth has been due to the competitive advantage of the area rather than structural changes in the economy as a whole. The key employment growth sectors of the local economy are construction, education, health and social work, financial intermediation, manufacturing and retail and wholesale distribution. This indicates that no-one sector dominates in Harrow, which means that the Borough is not over-reliant on one industry and should be more resilient in harder economic conditions.
- 8.2.2 Harrow is characterised by a good balance between the high level of business start-ups and micro-businesses and larger companies such as Kodak and Katie's Kitchen (66 organisations in total) employing more than 100 workers.
- 8.2.3 The Borough also has other key attributes, such as a growing resident population of working age, well-qualified school leavers and its large ethnic minority base.
- 8.2.4 Harrow, being located on the edge of the "Western Wedge" has in recent years experienced less economic growth in comparison to the rest of West London. Within the Borough, in the last few years there has been a slowing in the growth of employing establishments and VAT registered businesses and a rise in unemployment, with pockets of higher unemployment. In addition, there are skills' shortages in a number of areas, such as computer operators, cleaners and domestics, sales assistance and administration staff.
- 8.2.5 Despite these trends the economic prospects of Harrow within the context of West London and London remain relatively good, with the presence of entrepreneurial flair and

well-established companies. These, plus the prospects linked with Crossrail 1 and the imminent introduction of congestion charging in Central London represent opportunities for the Borough to promote itself more proactively as a competitive business location. In terms of Crossrail 1, we would suggest that if Option 1 – Watford Junction Line (via Harrow & Wealdstone station) is chosen, it would create limited commercial impact.

The Local Property Market

- 8.2.6 Harrow continues to enjoy a strong demand in the industrial market at all levels from starter units through to expansion and larger formats. The principal driver of the market is local businesses serving the surrounding community. These small businesses require units of up to 465m².
- 8.2.7 Having evolved as a local market, most of the major industrial sites are found in mixed-use areas comprising competing retail and residential users. Transport is frequently congested and the available units are too small to attract national operators. As a result these areas remain home to the indigenous industrial businesses.
- 8.2.8 The current industrial rental values at £97 per m² indicates a tight market with demand outstripping supply, which is at an acute level.
- 8.2.9 There is a lack of sites coming to the market to satisfy the demand. Where developers have been able to renew stock, such as at Neptune Road, the take-up of this space has been brisk. The returns on industrial schemes can also be lucrative with investment yields at 7%.
- 8.2.10 Broadly speaking, the future for industrial demand and supply within these areas will be reliant upon the development of more modern accommodation in areas that do not conflict with the surrounding community and the renewal and rationalisation of older stock. There are specific opportunities where it may be possible to attract interest from a wider regional base, such as at Honeypt Lane.
- 8.2.11 In recent years, there has been relatively little investor/developer activity within the office market, and since the late 80's early 90's, nothing in the way of a new speculative office development.
- 8.2.12 With rents below £204 per m² for the better-specified buildings, and demand at its current lows, we do not foresee any speculative development by an investor in the near future. It is likely that even if the economy picks up in 2003/2004, occupiers will continue to gravitate towards those more established centres such as Watford, Uxbridge and the Thames Valley.
- 8.2.13 The future for the London Borough of Harrow's office markets is likely to hinge on Harrow Town Centre. In the immediate future, areas such as South Harrow, North Harrow and Rayners Lane will continue to see the current office supply remain static, indeed, pressure may begin to build up for change of use for some redundant vacant office buildings.
- 8.2.14 The current supply of office accommodation in the suburban centres will continue to service the relatively small demand, which will emanate from current residents of the London Borough of Harrow.

Supply and Demand Characteristics

- 8.2.15 In total, there are 16 Strategic Employment Areas and 9 Borough Employment Areas. There is a total of 71 hectares of designated employment land and 458,655m² of gross ground floorspace in total (inclusive of Local employment areas).
- 8.2.16 Most of the designated employment areas are in close proximity to residential areas, or infrastructure links, such as the railway lines, which restricts expansion of existing industrial estates, and ultimately limits the opportunities to compete for major inward investment. There is only two small sites that could be brought forward in the short to medium term for new employment development (B1, B2 and B8 Uses).
- 8.2.17 The industrial stock in Harrow is characterised by predominantly small units of less than 1,000m² with a dearth of large units, reflecting the Borough's small business base. There are only two properties over 5,000m². In terms of quality, the shortage of available stock is creating well-maintained estates, even where older factory stock is prevalent. The Borough has experienced some new industrial space in recent years, as well as refurbishment. There is little evidence of dilapidation and few redundant sites.
- 8.2.18 The employment areas are characterised by low vacancy rates with several estates having high occupier retention rates (above 60%), reflecting well established companies, which have been in-situ for over five years. In some cases, companies has been able to expand in-situ and have taken more and more space within an individual industrial estate. Examples of this trend, include Microlease at Whitefriars Industrial Estate, Katie's Kitchen at Christchurch Industrial Estate, and Thales Acoustics at Waverley Industrial Park.
- 8.2.19 We acknowledge that the stock in Harrow Town Centre around the station is modern rather than brand new with a large amount of stock available on the market. A number of buildings have recently been converted to provide serviced offices in Harrow, South Harrow and Rayners Lane, which indicates the state of the office market in the area. Older office buildings have experienced mixed fortunes, with areas such as Lyon Road in Harrow town centre maintaining a number of established organisations with good covenant strength, and other areas such as the northern section of Northolt Road struggling to maintain and attract tenants. Self contained office schemes such as at Spring Villa Road demonstrate that modern space can be developed outside Harrow town centre in accessible locations, where adequate car parking can be supplied on site.
- 8.2.20 It is apparent that Harrow is not a major inward investment location within the context of West London with Uxbridge, Hammersmith & Fulham, Ealing and Hounslow more attractive to domestic and foreign investment. Contrary, the economy of Harrow is driven by the high level of entrepreneurial activity, which creates in the region of 100-150 new firms a year. The business base is well balanced with no single dominant sector and is relatively self-contained with low levels of business movements into or out of the Borough. Most businesses are generally satisfied with the business environment, although parking, business rents/rates and traffic congestion remain the principal disadvantages for businesses.
- 8.2.21 Enquiry data suggests that a large number of outstanding requirements in the north west London area, which Harrow could potentially fulfil. Anecdotal evidence given by local agents suggests that demand for industrial units remains strong, at all levels including low-cost units, but enquiries for offices are small in comparison.
- 8.2.22 Analysis of take-up rates in the Borough supports this anecdotal evidence with lettings/sales of industrial floorspace totalling 4,218m² over the past 12 months with a theoretical supply of approximately 21 months left. In contrast, office lettings/sales

totalled 2,518m² over the past 12 months with a theoretical supply of approximately 3.5 years left, although this supply figure may be even higher, when data from the Council's 'Available Business Premises Register' is compared.

- 8.2.23 The oversupply of offices within the Borough and structural changes within certain organisations, coupled with the lack of demand has led to significant losses of B1 office floorspace in recent years through planning consents. B8 uses have also experienced a significant net loss of floorspace, which indicates the poor road links of some parts of the Borough for distribution operations. In contrast, B1 light manufacturing and B2 general industrial uses have both experienced gains in floorspace, which reinforces the strong demand for these uses in the Borough.
- 8.2.24 In terms of trends for market sectors, Harrow is well placed to encourage more serviced offices, especially affordable alternatives to existing supply; industrial incubator space and expansion space to cater to local demand; and some additional distribution space within the Honeypot Lane area. There is potential latent demand from businesses trading from home, especially creative industries, and also from the ethnic communities. The creation of low-cost quality managed workspace or live/work units with business support services available would help to cater for this potential demand. Links with the New Media Knowledge Centre at University of Westminster should be explored to spread to benefits of innovation wider into Harrow town centre.
- 8.2.25 Crossrail would benefit the office market in Harrow Town Centre through Option 2, rather than Wealdstone through Option 1. There is no office market at Wealdstone and with the potential advent of Crossrail, the market is unlikely to want to invest in new commercial property around the district centre of Wealdstone. However, Option 1 may increase the attractiveness of Wealdstone as a place to live. Option 2 at Harrow town centre is unlikely to lead to a sea change in the office market at Harrow, but may generate increased interest and a moderate amount of new floorspace.

Sector Trends

- 8.2.26 A number of 'top-down' and 'bottom-up' trends are evident across the industrial and office sectors. These are highlighted below, with their relevance to London Borough of Harrow and the future demand for employment land and premises.

Manufacturing Sector

- 8.2.27 At the highest level, there continue to be reductions in the number of employees and increases in output. Whilst the UK continues to attract value-added manufacturing activity, labour-intensive processes are now focused in Eastern and Southern Europe and other parts of the world, such as the Far East.
- 8.2.28 These trends have been evident in London, with traditional manufacturing industry declining, whilst at the same time, new investment has been attracted. However, what has become evident is that the new companies require modern, flexible premises, in terms of both size and layout and lease terms.
- 8.2.29 Most new manufacturing firms require small start-up space, often on flexible terms and ideally subsidised to reduce their exposure at this stage in their development. Such space is often available either through modern managed workspace schemes, such as Cliveden Centre or in older premises on existing industrial estates, such as at the Council Depot.

- 8.2.30 As these businesses expand, they either grow in-situ or move into expansion space. Sometimes, such accommodation is still available through managed workspace schemes, although it is more likely that businesses need to move to a more formal type of occupation, either through a lease or by purchasing a property. With the pace of change in modern industry, businesses are resistant to taking long leases, of 10 years plus, or will tend to purchase their own premises.
- 8.2.31 Due to the shortage of expansion space in the Borough, a number of companies have had little choice but to expand in-situ, by taking adjacent units on estates. There is a danger that, once larger firms have outgrown a particular industrial estate, they may be forced to move out of the Borough to meet their floorspace requirements.
- 8.2.32 From the investor perspective, whilst shorter-leases are becoming more commonplace, there are many investors, who are still resistant to this type of deal, unless there is a strong covenant from the occupier or rental levels are such that demand exists to minimise exposure.
- 8.2.33 Demand also breaks down into different types of space, typified by:
- Low cost B1 space for local industries serving the immediate community;
 - Modern, flexible B1 space, often with ancillary offices for high-value added manufacturing;
 - Combined B2/B8 space for “just in time” activities;
 - Traditional B2 space for general manufacturing activities; and
 - Specialist B8 space for large distribution activities.
- 8.2.34 There are also other niche activities, which by their nature are concentrated in certain locations. For example, Car-related activities located at the Arches, South Harrow.
- 8.2.35 Accommodation needs are therefore varied, in terms of size, location, age, ownership requirements and the non-property part of the offer. A portfolio of opportunities must be provided.
- 8.2.36 However, in metropolitan areas, such as London, the industrial stock is becoming increasingly obsolete in terms of the physical and functional needs of modern business. For instance, in certain metropolitan areas, research has suggested that up to 20-30% of the industrial stock does not meet modern requirements. However, due to the acute shortage of space this proportion is around 17% in the London Borough of Harrow.
- 8.2.37 Whilst refurbishment of the existing stock does have a role to play, this is only part of the solution. It can be as expensive as new build and may not see increases in rental levels or freehold prices to provide a return on the investment. At present, rental levels are high enough to stimulate refurbishment and renewal as shown by the recent development by Thorneycroft at Neptune Road. It is important that sites are also brought to the market in Harrow to provide developers and occupiers with a wider choice.

Service Sector

- 8.2.38 Like the manufacturing sector, the service sector has changed markedly over recent years.
- 8.2.39 In addition to the blurring of the edges between certain activities, such as in B1 Use Class Order, there have been a number of trends, which have changed accommodation needs.

- 8.2.40 The 1960's/1970's were characterised by demand focused in large, multi-storey office blocks. These are evident in most town centres and also reflect the regional and sub-regional delivery of office-based services at that time.
- 8.2.41 In the intervening period, there has been a move away from local to more remote delivery, firstly, through fewer, larger facilities in major cities, which then drifted to out-of-town locations and business parks, and then to call-centres, often located in peripheral regions or outside the UK.
- 8.2.42 These changes have been driven by a number of factors, but could not have been achieved without the significant developments in ICT that have occurred in the last 20 years and which are forecast to continue.
- 8.2.43 This has led to a reduction in large floorspace requirements, which has been supported by increased outsourcing of activities or the establishment of back-offices in cheaper locations.
- 8.2.44 As in manufacturing, the pace of change is rapid, businesses are resistant to take long leases, of 10 years plus, or will tend to purchase their own premises. Certain overseas investors, for instance, are very resistant to leasing space.
- 8.2.45 Again, whilst shorter-leases are becoming more commonplace, there is still a need for a strong covenant from the occupier or rental levels that make the deal bankable.
- 8.2.46 These various trends and the tendency for blue chip, office-based organisations to reduce their core accommodation needs, has seen the growth of the serviced office market. Whilst the previous success of the likes of Regus is well documented, serviced office accommodation is also provided by managed workspace providers to help new businesses enter the market. Harrow Council themselves has intervened in the market with their First Base scheme at Forward Drive to achieve this.
- 8.2.47 As in the manufacturing sector, there are also specialist niche markets, such as the internet data centres/telehouses. These have particular infrastructure needs, which determine where they are located.
- 8.2.48 The most recent trend has seen the development of serviced office accommodation with broadband capabilities, for instance, Land Securities plans for the Empress State Building in Earl's Court.
- 8.2.49 Indeed, some market commentators say that the old adage of "location, location, location" has been replaced by "location, bandwidth, flexibility" (the latter referring to the occupancy terms).
- 8.2.50 The final point to make is that more office-based location decisions are said to take account of the quality of the overall living and working environment. Whilst this may simply reflect the fact that more location-decisions are made in Board Rooms by Managing Directors, it does confirm the comment made in Ernst & Young's European Investment Monitor Report (2001) that property and land availability are not enough.
- 8.2.51 Whilst the accommodation needs of the service sector are less varied, choice is again needed and there is only a limited role for secondary office space developed in the 1960's and 1970's in locations such as Northolt Road, South Harrow.

8.2.52 New quality build provision with good amounts of car parking and good road accessibility in an attractive business park style environment is probably the only way to create a change in the image and perceptions for an area. Harrow town centre needs to promote itself as a business location with good accessibility to Central London, Heathrow and the City to gain its fair share of the forecast financial and business service sector investment. There are also opportunities for smaller, stand-alone schemes to be developed in accessible locations, given the relative lack of impact on the local environment. Indeed, live/work accommodation provides one means of the provision of such space.

Marketability of Major Sites

8.2.53 Our investigation has highlighted a number of sites within the Borough with potentially an enhanced role to play in the future of the Harrow economy, and also a number of sites that have a declining economic role.

8.2.54 Brember Road Industrial Estate at South Harrow and the Government Office Site at Honeypot Lane offer realistic and achievable market opportunities to enhance the industrial offer in the Borough. The TXU site and vacant Biro House at the rear of Brember Road Industrial Estate has laid inactive for a number of years, and the Council is seeking to open-up this land by relocating the in-situ Training Centre and promoting a new access via the adjacent Waitrose superstore. We would endorse the regeneration of the estate and suggest that a new scheme of 2500m² in lot sizes of 500m² is achievable and would be attractive to developers in the market. In addition, the vacant southern part of the Government Office site is cleared and “ready for development” and would form a natural extension to the Stanmore Industrial Business Park strategic area. The site has an outstanding planning consent for a cross-cultural centre and affordable housing, although this may lapse and provide the market with a single distribution facility serving the region. There may also be some incremental growth at the successful Neptune Road Industrial Estate.

8.2.55 Some of the older industrial and commercial stock in the Borough is in need of regeneration, although in these locations the market is not strong enough to stimulate renewal and investment. The northern section of Northolt Road, South Harrow has a number of ageing 1960s/1970s buildings, which are wholly or partially vacant and suffering from the downturn in demand. With the oversupply of modern stock and market focus at Harrow town centre the prospects for renewal of this older stock is declining. We recommend that the Council’s consider producing a masterplan for this northern section, which includes the Police Station to create a more vibrant mixed-use environment. This would have the effect of consolidating the better quality stock at the southern section of the strip, nearest the station. The masterplan could contain a component of new offices for perhaps a new Police Station and new stock to cater for local demand. In addition, parts of the Palmerston Road/Oxford Industrial Area is in need of renewal and new investment. The Crossrail Option 1 may provide an opportunity to stimulate this new investment. Land to the west of the flyover is detached from the rest of the industrial estate and is more homogeneous with Wealdstone High Street. We recommend that the Council considers a strategy for this area to promote a mixed-use development incorporating residential, retail and some managed offices/workspace to cater for local demand and the growing creative industries sector.

8.2.56 We endorse the Council’s policies to protect sites such as Lyon Road within Harrow town centre from change of use in the short to medium term and the retention of the BAE Systems site at Stanmore for B1 employment uses. In terms of Lyon Road, the stock is 1960s/1970s construction, although some buildings have experienced recent

refurbishment work and extensions. There are a number of prominent occupiers with good covenant strength and in addition a good serviced office scheme, which creates an area of high occupancy. We recognise that in the longer term without comprehensive redevelopment with major pre-let from say the existing occupiers the demand for these old office buildings would dwindle. If this does happen, there may be justification for a change of use to alternative uses, such as residential but also leisure. In terms of the BAE Systems site, vacant possession of the site will occur in 2005 and we believe that to date, demand for the site has not been tested by the freeholder. A similar R&D company would provide an ideal solution to this problem, although there is an opportunity to create a B1 business park or medical-park utilising the links with the Royal National Orthopaedic Hospital or perhaps the University of Westminster.

8.2.57 In terms of the possible impact of Crossrail 1 Option 2 on Harrow town centre and future office development around Harrow-on-the-Hill station, we believe that without a significant uplift in demand and take-up, investors would not be attracted to Harrow in any great number. There is an opportunity to create some new floorspace as part of a mixed-use scheme above the station and utilising the partially vacant Post Office Sorting Office. Public sector funds would potentially be needed to make any scheme financially viable.

8.3 AIMS OF THE STUDY BRIEF

What is the quantitative and qualitative need for industrial land in the Borough over the next 10-15 years?

- 8.3.1 Although, we have not undertaken an econometric based quantitative analysis of future requirement of employment land, we have produced a qualitative assessment of industrial and office sites and premises in the Borough.
- 8.3.2 Our findings suggest that over the next 15 years the demand for industrial premises in the Borough is likely to continue to be driven by local firms, especially as the rate of new business start-ups is the second highest of all boroughs in London and one of the highest in the country. Therefore, there will be a need to provide more start-up on existing industrial estates or vacant sites, where possible.
- 8.3.3 The demand for expansion space appears to be less certain, with only 15% of surveyed firms in the Borough in 1999 wishing to expand their business in terms of floorspace. This proportion appears to be lower than other London Borough's which Chesterton has studied. However, recent trends on industrial estates with the growth of specific companies in-situ suggests that there is a need to provide additional expansion units for established firms seeking additional floorspace helping to increase availability and choice and preventing the more modern estates from being dominated by one employer.
- 8.3.4 In addition, our findings indicate that there is qualitative evidence that more distribution space would be taken up if developed on the eastern side of the Borough. Honey Pot Lane would be the most suitable location for new B8 Use warehouse/distribution 'sheds'.
- 8.3.5 In terms of inward investment, whilst Harrow is still likely to struggle to compete with other West London locations, it may be that as a result of various triggers, including Crossrail, congestion charging in Central London, the adoption of a cluster-based marketing strategy and the policy approach of some neighbouring authorities, Harrow will be able to secure more inward investment than in the recent past.
- 8.3.6 In terms of the latter, the latest Hertfordshire County Structure Plan Alterations, July 2002 forecasts that only 0.3 million m² of employment space is required over the period 2001-2016.

This may mean that there are limited expansion opportunities for local firms, creating more demand for neighbouring authorities, including the Outer London Boroughs. It could also lead to inward investors looking harder at some of the existing employment areas, such as Honeypot Lane for distribution activities.

What is the demand for starter units/low cost accommodation by type of unit – office, workshops, light industrial etc.?

- 8.3.7 The demand indicators suggest that there will be continued demand for starter units in the Borough for both industrial and office-based businesses. The growth in the level of serviced office provision, and the take-up of space at Cliveden Centre, Hawthorn Centre and the Council's First Base Scheme indicates that this type of accommodation remains popular and essential to developing the local business base.
- 8.3.8 Our investigations have also highlighted that there is latent demand for small/starter premises from businesses currently trading from home. There appears to be an "affordability versus quality" issue and it may be that such demand has to be met in subsidised space. The Council's First Base Scheme and depot complex at Forward Drive in general provides a low cost market alternative for new businesses in B1, B2 and B8 Use Class activities. However, in terms of B1 offices, the Council managed estate does not cater for service industries, requiring a town centre presence and attractive modern accommodation. The current serviced offices in and around Harrow Town Centre, such as Regus and MWB Business Exchange, offer space at commercial rents and no business support to help nurture and grow local firms.

What is the marketability of major industrial sites and the supply required to maintain/enhance Borough employment?

- 8.3.9 Our appraisal of eight major sites in the Borough suggests that from a commercial perspective not all employment land should be protected over the next 15 years. In marketability terms, we have identified opportunities to bring forward the vacant site at Brember Road Industrial Estate to create a scheme of 2,500m² industrial floorspace to cater for local demand. In addition, the southern part of the Government Offices site at Honeypot Lane should be promoted as a natural extension to Parr Road/Garland Road estate to cater for potential demand from national distribution operators.
- 8.3.10 The sites at Lyon Road, Neptune Road, College Road and the BAE Systems site at Stanmore should remain protected for employment uses over the lifetime of the Replacement UDP as the marketability of these sites appears to be good over the next 15 years.
- 8.3.11 The marketability of the northern section of Northolt Road and the western part of the Palmerston Road/Oxford Road Industrial Area for purely employment uses is low. We recommend that masterplans should be prepared for these areas to stimulate regeneration. A mix of uses, incorporating some element of employment uses may help to increase developer interest and create a more active and attractive environment.

What are the emerging trends and demand for live/work?

- 8.3.12 Section 8.2.4 above highlights recent trends in various business sectors.
- 8.3.13 In terms of live/work, we do not present any primary evidence of demand in this study, although our recent work in London has highlighted that demand is generated from a number of factors. These factors include, a deficiency in housing provision; forecast growth in financial and business services; employment orientated to personal services, such as creative industries; the desire to work from home; and the growing ethnic minority business base.

- 8.3.14 The focus for live/work development has traditionally been East London, especially City Fringe locations such as Shoreditch, Hoxton, Clerkenwell and Spitalfields where space was cheap. There is evidence that demand for live/work is being generated in West London. The Peabody Trust's recent development at Kensal Green is one example.
- 8.3.15 Harrow appears to be well placed to generate demand for live/work units with its large ethnic minority business base; the perceived high number of businesses trading from home; and the potential to cluster a greater number of creative industries. Demand indicators such as the number of planning applications received by the Council for live/work schemes suggests that current requirements are low. Developers may be reluctant to develop such schemes, possibly due to the weakness of the office market compared to alternative uses.
- 8.3.16 The development of Live/work accommodation remains a distinct opportunity in the Borough, and should be promoted within identified areas of regeneration, such as Wealdstone to provide an affordable alternative for businesses current trading from home.

What is the demand for and supply of office accommodation considering the future suitability and viability of office blocks in Harrow and South Harrow, market perceptions of Harrow as an office location and potential impact of Crossrail?

- 8.3.17 Generally, there is an oversupply of office space in both Harrow Town Centre and Northolt Road, South Harrow. Demand for offices in the Borough is static with Harrow Town Centre being the main area of activity. The majority of demand is for units of up to 500m², reflecting localised market.
- 8.3.18 The best office stock can be found at Harrow Town Centre – principally College Road and Lowlands Road with a number of modern buildings constructed in the 1980s and early 1990s. We believe that in the short to medium term Harrow Town Centre will remain the focus for the office market with little demand for offices at South Harrow and beyond reflecting our comments regarding the future viability of Northolt Road.
- 8.3.19 There is a good level of outstanding requirements for the right type of space in North West London, although Harrow currently lacks this type of product.
- 8.3.20 Harrow is still perceived as a secondary office location within the context of West London. Harrow's office market is perceived as similar to Wembley, and lagging behind the more attractive locations of Uxbridge and Watford in the north London/M25 area. This perception is unlikely to change in the short to medium term. In the longer term, parcels of land around Harrow-on-the-Hill station could be assembled to create a major development site (as assessed in the GVA Grimley Initial Feasibility Study). This presents a significant opportunity to change the perception of Harrow town centre to potential office occupiers and investors. Similarly, in the longer term, the perception of Harrow as an office location may change due to Crossrail, although this will be dependant on which route choice is made.

8.4 POLICY IMPLICATIONS

- 8.4.1 We endorse the employment policies as set out in the Replacement UDP Deposit Draft, although we would recommend the following changes to specific policies, as follows:
- Policy EM14 - Removal of part or all of the northern section of Northolt Road from Policy EM14. This would provide the flexibility to regenerate this area for a mix of uses under Policy EM16; and

- Policy EM15 - Removal of the western part of Palmerston Road/Oxford Road Industrial Area from Policy EM15. This would provide the flexibility to regenerate this area for a mix of uses under Policy EM16 or under the various town centre policies, as this area is located within the Wealdstone Town Centre boundary.
- 8.4.2 In terms of monitoring systems, we acknowledge that the Council has a number of monitoring databases for employment land, although these should be brought together to create a more comprehensive and regularly updated system. There are several improvements to the current systems that we would recommend. These are:
- 1) Industrial Estates Surveys to be widened to relate occupiers of units to floorspace figures, and vacant units also noted in terms of unit number and floorspace. In addition, the surveys should establish the activity undertaken in each unit using the Standard Industrial Classification 1992 (SIC);
 - 2) To regularly update surveys of all employment land, preferably once a year, resources permitting; and
 - 3) A new updated Employers' Survey should be undertaken in the next 2 years.

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Meeting:	Unitary Development Plan Advisory Panel
Date:	16 th September 2003
Subject:	Stanmore Hill Conservation Area – Conservation Area Policy Statement
Key decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Portfolio Holder for Planning, Development and Housing
Status:	Public
Ward:	Stanmore Park
Enclosures:	Appendix 1 – Conservation Area Study (Internet publication restricted due to copyright issues)

1. Summary

- 1.1 The Draft Policy Statement was considered by the UDP Panel on 13th March 2002 and by Cabinet on 29th May 2002 and has since been the subject of public consultation in the area and with local and national amenity societies. This has now been completed. It is now before the UDP Panel to recommend to Cabinet its approval as Supplementary Planning Guidance to the Unitary Development Plan.

2. Recommendations

- 2.1 **That the Conservation Area Policy Statement for Stanmore Hill Conservation Area be recommended for approval by Cabinet**

REASON: To ensure that the Study, which as a draft was subject to public consultation in accordance with Government Guidance, now acquires the status of Supplementary Planning Guidance.

3. Consultation with Ward Councillors

- 3.1 Ward Councillors were consulted as part of the consultation prior to the UDP meeting in February 2003 and were sent copies of the draft study.

4. Policy Context (including Relevant Previous Decisions)

- 4.1 The Draft Study was considered by the Unitary Development Plan Advisory Panel on 13th March 2002 and was agreed by Cabinet on 29th May 2002. When approved after

appropriate local public consultation the Conservation Area Study will have the status of Supplementary Planning Guidance to the Harrow Unitary Development Plan. It is important that it is agreed as Supplementary Planning Guidance because it then has more weight attached to it during the planning process and it stands alongside the UDP, with policies stemming from it but with a site specific emphasis.

5. **Relevance to Corporate Priorities**

- 5.1 This report addresses the Council's stated priority of enhancing the environment of the borough.

6. **Background Information and options considered**

- 6.1 Government guidance in PPG15 (Planning and the Historic Environment) asks for wide consultation when formulating proposals for the preservation and enhancement of conservation areas, and in PPG12 (Development plans) it states that supplementary planning guidance must be prepared in consultation with the public and their views taken into account before it is finalised.
- 6.2 All the owners/occupiers of properties within the conservation area have been sent a letter asking for their views on the Draft Policy Statement. Copies of the Draft Study were also sent to all 14 members of the Conservation Areas Advisory Committee who represent local and national amenity societies, the Stanmore Society, Harrow Heritage Trust, English Heritage and additional copies were placed on deposit in Stanmore Library and in Harrow Reference Library. A public meeting was held at the Glebe Hall in Stanmore on 20th May 2003 to discuss the study and for the public to pass on any comments.
- 6.3 There have been 8 telephone responses, five letters in response, and there were ten attendees at the public meeting.
- 6.4 The responses fall into three categories: concern about traffic and parking problems in Green Lane, concern at poor condition of the public realm and detailed factual points on the draft. The majority of the respondents were happy to be in a conservation area and for it to be receiving detailed attention from the Council.
- 6.5 Parking and traffic is clearly a significant local concern in Green Lane. Several of the residents in Green Lane expressed concern that the levels of parked cars detrimentally affected the area's special character. Parking on verges and pavements also damages the pavements again to the detriment of the area. In addition, residents believed that increased levels of traffic were creating potential structural problems with their cottages, which are located directly on to the street. The study has been revised to include traffic and parking as one of the Detractions of the area, listed on page 43 of the document. In addition, residents queries have been passed to Highways but it is understood that Green Lane is not a high priority for road calming or parking restrictions.
- 6.6 There is considerable concern about the poor state of the public realm within the conservation area, particularly on the poor repair of pavements, lack of lighting, problems of graffiti and litter. The policy statement reflects this and sets out a number of enhancement proposals, which were welcomed by the public. The statement offers advice to local people and council departments on what may be appropriate and how the area can be enhanced as replacements are made over time. It will also provide an

important local context for the New Harrow Project when it is rolled out to this area. Residents were keen for the Council to apply for funds to undertake enhancement works such as relocating the cattle trough, shown on the front cover of the study, back to the top of Green Lane from its current location outside St John's Church.

6.7 Some detailed changes have been suggested where dates of buildings were incorrect, or where photos were unclear etc. All of these changes have been made in the revised document.

6.8 The revised document is attached as Appendix 1. The revisions are underlined in the text.

7. **Consultation**

7.1 See Section 6.2 above.

8. **Finance Observations**

8.1 No comment

9. **Legal Observations**

9.1 No comment

10. **Conclusion**

10.1 The Draft Policy Statement for Stanmore Hill Conservation Area was agreed in May 2002 subject to the carrying out of public consultation in the local area. That consultation has now been completed and the Study, with some amendments as a result of that consultation as described above, is now presented for final approval.

11. **Background Papers**

11.1 None

12. **Author**

12.1 Amy Burbidge
Principal Conservation Officer, Ext. 2468

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Meeting:	Unitary Development Plan Advisory Panel
Date:	16 th September 2003
Subject:	Little Common Conservation Area – Conservation Area Policy Statement
Key decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Portfolio Holder for Planning, Development and Housing
Status:	Public
Ward:	Stanmore Park/Canons
Enclosures:	Appendix 1 – Conservation Area Study Appendix 2 – Revised boundary map and note Appendix 3 – Revised Article 4 Directions (Internet publication of appendices 1 & 2 is restricted for copyright reasons)

1. Summary

- 1.1 The Draft Policy Statement was considered by the UDP Panel on 13th March 2002 and by Cabinet on 29th May 2002 and has since been the subject of public consultation in the area and with local and national amenity societies. This has now been completed. It is now before the UDP Panel to recommend to Cabinet its approval as Supplementary Planning Guidance to the Unitary Development Plan.

2. Recommendations

- 2.1 **That the Conservation Area Policy Statement for Little Common Conservation Area be recommended for approval by Cabinet**

REASON: To ensure that the Study, which as a draft was subject to public consultation, now acquires the status of Supplementary Planning Guidance.

- 2.2 **That authority be given to the Borough Solicitor to serve revised Article 4 Directions and to amend the Conservation Area boundary to remove one property included in error, as set out in the map on Appendix 2 and schedules in Appendix 3**

REASON: To ensure that the appropriate notices are served

3. **Consultation with Ward Councillors**

- 3.1 Ward Councillors were consulted as part of the consultation prior to the UDP meeting in February 2003 and were sent copies of the draft study.

4. **Policy Context (including Relevant Previous Decisions)**

- 4.1 The Draft Study was considered by the Unitary Development Plan Advisory Panel on 13th March 2002 and was agreed by Cabinet on 29th May 2002. When approved after appropriate local public consultation the Conservation Area Study will have the status of Supplementary Planning Guidance to the Harrow Unitary Development Plan. It is important that it is agreed as Supplementary Planning Guidance because it then has more weight attached to it during the planning process and it stands alongside the UDP, with policies stemming from it but with a site specific emphasis.

5. **Relevance to Corporate Priorities**

- 5.1 This report addresses the Council's stated priority of enhancing the environment of the borough.

6. **Background Information and options considered**

- 6.1 Government guidance in PPG15 (Planning and the Historic Environment) asks for wide consultation when formulating proposals for the preservation and enhancement of conservation areas, and in PPG12 (Development plans) it states that supplementary planning guidance must be prepared in consultation with the public and their views taken into account before it is finalised.
- 6.2 All the owners/occupiers of properties within the conservation area have been sent a letter asking for their views on the Draft Policy Statement. Copies of the Draft Study were also sent to all 14 members of the Conservation Areas Advisory Committee who represent local and national amenity societies, the Stanmore Society, Stanmore and Harrow Historical Society, Harrow Heritage Trust, English Heritage and additional copies were placed on deposit in Stanmore Library and in Harrow Reference Library. The Conservation Officer attended a meeting of the Little Common Residents Association on 19th December 2002 and a public meeting was held at the Glebe Hall in Stanmore on 22nd April 2003 to discuss the study and for the public to pass on any comments. A statement on the consultation will be in a separate document to be made available with each copy of the SPG.
- 6.3 There have been 5 letters in response, 1 phonecall and there were 16 attendees at the Little Common Residents Association meeting and 7 at the public meeting.
- 6.4 As part of the response, an error in the drawing of the boundary has been found. 153 Stanmore Hill has been included in error. It is not of any particular architectural merit and it was merely a drafting error that saw it included. Therefore, the boundary has been revised to omit this property and the owner will be informed. In addition 153, Stanmore Hill was included in the Article 4 Directions and maps, again in error, and so the

Directions have not been confirmed. Authority is therefore sought to revise the boundary and to re-serve the Article 4 Directions.

- 6.5 The responses indicate that the local people are very proud of their area and pleased that it is a conservation area. There was a desire to preserve its charm and historic character. The main concerns expressed however related to the state of the public realm in the area and to empty/disused buildings.
- 6.6 In terms of problems with the public realm, there was concern about the proliferation of new and unnecessary signage and a new speed camera on Stanmore Hill. Concern over the condition of the graveled area at the centre of Little Common was expressed. In addition, parking within the area is causing damage to the grass verges and the residents were keen to see timber posts erected to protect the verges. Problems with graffiti appear to be on the increase. These problems are recorded in the study which offers advice to local people and council departments on what may be appropriate ways of tackling the problems and what the constraints are. Residents are keen to be involved in any improvement projects. The study should also provide an important local context for the New Harrow Project when it is rolled out to this area.
- 6.7 There was concern about the vacant and disused state of the Cloisters Wood Gym and the former Mission Hall at the centre of the Common. It is understood that a planning application for the adjacent Wood Farm site has been received and is under consideration which may spark interest in the Cloisters Wood site. The Mission Hall is part of the Common Lands which are leased to London Borough of Harrow. It is not in use and is in poor repair and there are no current proposals for either its demolition or reuse. Both of these structures are discussed in some detail in the study, highlighting their merits or otherwise in order to assist in developing proposals for their futures.
- 6.8 The revised document is attached as Appendix 1. The revisions are underlined in the text. A note on the consultation responses will be published separately and will be available with the statement.

7. **Consultation**

- 7.1 See Section 6.2 above.

8. **Finance Observations**

- 8.1 No comment

9. **Legal Observations**

- 9.1 No comment

10. **Conclusion**

- 10.1 The Draft Policy Statement for Little Common Conservation Area was agreed in May 2002 subject to the carrying out of public consultation in the local area. That consultation has now been completed and the Study, with some amendments as a result of that consultation as described above, is now presented for final approval.

11. **Background Papers**

- 11.1 None

- 12. **Author**
- 12.1 Amy Burbidge Principal Conservation Officer, Ext. 2468

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Appendix 3

LITTLE COMMON CONSERVATION AREA –ARTICLE 4 DIRECTIONS

Schedule 1

Covers residential, prominent properties of conservation value. The aim being to protect these properties from unsuitable alterations to their fabric and their setting.

Properties included under Schedule 1 are:

Stanmore Hill : Nos. 116,, 156, 158, 193

Wood Lane: By the Pond, Woodleigh, Limes House Lodge, Woodfarm Cottage, Moor House, 1 and 2 Garage Cottages

Aylmer Close: No. 3

Little Common: Nos. 1, 2, 3, 12, 18, 19, 20, 21, 22

To remove the following permitted development rights for development (Planning (General Permitted Development Rights) Order 1990) which would front a highway, waterway or open space:-

- (a) Class A of Part 1 of Schedule 2
The enlargement, improvement or other alteration of a dwellinghouse.
- (b) Class C of Part 1 of Schedule 2
Any other alteration to the roof of a dwellinghouse.
- (c) Class D of Part 1 of Schedule 2
The erection or construction of a porch outside any external door of a dwellinghouse.
- (d) Class F of Part 1 of Schedule 2
The provision within the curtilage of a dwellinghouse of a hard surface.
- (e) Class H of Part 1 of Schedule 2
The installation, alteration or replacement of a satellite antenna on a dwellinghouse or within the curtilage of a dwellinghouse.
- (f) Class A of Part 2 of Schedule 2
The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure.
- (g) Class C of Part 2 of Schedule 2
The painting of the exterior of any building.

Schedule 2: Buildings which may not be of intrinsic architectural merit or group value in the townscape but their boundary treatments or gardens do form part of the character of the conservation area.

Properties included in Schedule 2 are:

Stanmore Hill: No. 181

Little Common: 14, 15,16,17, 8

Wood Lane: Five Trees

To remove the following permitted development rights for development (Planning (General Permitted Development Rights) Order 1990) which would front a highway, waterway or open space:-

- (a) Class A of Part 2 of Schedule 2
The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure.
 - (b) Class F of Part 1 of Schedule 2
The provision within the curtilage of a dwellinghouse of a hard surface.
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