



UNITARY DEVELOPMENT PLAN ADVISORY PANEL (SPECIAL)

WEDNESDAY 12 NOVEMBER 2003
7.30 PM

PANEL AGENDA (ADVISORY)

COMMITTEE ROOMS 1 & 2,
HARROW CIVIC CENTRE

MEMBERSHIP (Quorum 3)

Chair: Councillor Burchell

Councillors:

IdaiKKadar	Marilyn Ashton
N Shah	Mrs Bath
Anne Whitehead (VC)	Mrs Kinnear

Reserve Members:

- | | |
|------------|---------------|
| 1. Blann | 1. Kara |
| 2. Bluston | 2. Versallion |
| 3. Ray | 3. Harriss |
| 4. Miles | |

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.

HARROW COUNCIL

UNITARY DEVELOPMENT PLAN ADVISORY PANEL (SPECIAL)

WEDNESDAY 12 NOVEMBER 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 interest (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 16 September 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 Committee 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 Committee Procedure Rule 13 (Part 4E of the Constitution).
7. **Deputations:**
To receive deputations (if any) under the provisions of Committee 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. **Harrow Unitary Development Plan - Consideration of the Inspector's Report on the Public Local Inquiry:** (Pages 7 - 60)
Report of the Chief Planning Officer.

AGENDA - PART II - NIL

**UNITARY DEVELOPMENT PLAN ADVISORY
PANEL**

16 SEPTEMBER 2003

Chair: * Councillor Burchell

Councillors: * Marilyn Ashton * Idaikkadar
* Mrs Bath * N Shah
* Harris * Anne Whitehead

* Denotes Member present

PART I - RECOMMENDATIONS

**RECOMMENDATION 1 - Employment Land Study by Chesterton and Future
Employment Policy in the Local Development Framework**

Your Panel considered a report of the Chief Planning Officer which summarised the findings of Chesterton plc, external consultants commissioned by the Council, to produce a study on the supply and demand for employment land and premises in the Borough. Their remit covered the following:

- assessing overall quantitative and qualitative demand for industrial land and office floorspace
- the demand for low-rent accommodation for business start-ups and the demand for work/live units
- assessment of 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.

Chesterton plc's findings considered by your Panel are set out in the officer's report circulated in the Supporting Documents pack. In noting these findings, your Panel was informed that Chesterton plc had conducted their study before the Unitary Development Plan (UDP) Public Inquiry and therefore Chesterton plc's findings, while helpful to the Public Inquiry, are now not all relevant as a result of the Inspector's Report.

Your Panel also agreed to the preparation of Master Plans/Area Action Plans for a number of sites in the area and further agreed that such plans ought to be also produced for both the Honeypot Lane area and the Biro Works site.

Members of the Panel made the following observations:

- that the fact that Chesterton plc agreed with Harrow that the BAE Systems site should be earmarked for B1 Use be welcomed, although the UDP Inspector disagreed with this
- that, whilst the findings showed that the current office accommodation in South Harrow is unlikely to be let in the near future, should the Master Plan for this area put forward a case for anything other than residential use, the issue of additional parking provision would need to be addressed
- that, whilst the bus service in South Harrow had improved, public transport, in particular the rail service into London, was inadequate.
- that access by vehicles to the Borough was limited and that the UDP Inspector had commented on this
- that there was a growth in demand for small industrial premises
- that the demand for inward investment was limited
- that the take-up of offices in the town centre was low.

Resolved to RECOMMEND: (to Cabinet)

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

Borough, be noted;

(2) that Master Plans/Area Action Plans for the Northolt Road, South Harrow Business Use Area/the western part of Wealdstone Industrial & Business Use Area, the Honeypot Lane area and the Biro Works site be prepared;

(3) that 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 be noted.

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

RECOMMENDATION 2 - Stanmore Hill Conservation Area - Conservation Area Policy Statement

At its meeting held on 29 May 2002, Cabinet approved the draft conservation area policy statement for Stanmore Hill. Since then, it has been the subject of public consultations in the Stanmore Hill area and with local and national amenity societies.

Following the completion of these consultations, your Panel received a further report of the Chief Planning Officer on the policy statement for Stanmore Hill Conservation Area. Subject to your approval, the report, which includes detailed changes, will have the status of Supplementary Planning Guidance (SPG) to the Harrow Unitary Development Plan (HUDP). It is important that it is agreed as SPG because it then has more weight attached to it during the planning process. It will also stand alongside the HUDP with policies stemming from it but with a site specific emphasis.

In welcoming the report, your Panel noted that the final sentence in paragraph 9.2.7 of the Policy Statement had been erroneously deleted. Your Panel was pleased to see that an exercise was being conducted by officers which examined each of the conservation areas systematically and in detail.

Resolved to RECOMMEND: (to Cabinet)

That the Conservation Area Policy Statement for Stanmore Hill Conservation Area be approved subject to the inclusion of the following sentence in paragraph 9.2.7 of the Policy Statement:

'The cattle trough shown on the front cover of this document was relocated some time ago to the open space outside St John's Church'.

[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.]

RECOMMENDATION 3 - Little Common Conservation Area - Conservation Area Policy Statement

Cabinet, at its meeting on 29 May 2002, agreed the draft policy statement for the Little Common Conservation Area. Since then, the policy statement has been the subject of public consultation in the area and with the local and national amenity societies.

Public consultation has now been completed and the responses are set out in the officer's report circulated with the Supporting Documents pack. Your Panel is recommending that the policy statement be approved as Supplementary Planning Guidance (SPG) to the Harrow Unitary Development Plan (HUDP) so that it carries more weight during the planning process. Your Panel is also recommending that the conservation area boundary be amended and that the revised Article 4 Directions be served again because No.153 Stanmore Hill had been included in the Article 4 Directions and maps, in error and, as a result, the Directions have not been confirmed.

In welcoming the final policy statement, your Panel was pleased to see that an exercise was being conducted by officers which examined each of the conservation areas systematically and in detail.

Resolved to RECOMMEND: (to Cabinet)

(1) That the Conservation Area Policy Statement for Little Common Conservation Area be approved;

[REASON: To ensure that the Study, which as a draft was subject to public

consultation, now acquires the status of Supplementary Planning Guidance.]

(2) That the Borough Solicitor be authorised to serve again revised Article 4 Directions and amend the Conservation Area boundary to remove one property (No. 153 Stanmore Hill), included in error, as set out in the map on Appendix 2 and the schedules in Appendix 3.

[REASON: To ensure that the appropriate notices are served.]

RECOMMENDATION 4 - London Plan EIP Panel Report and the main implications for Harrow

The Panel received a report of the Chief Planning Officer on the Examination In Public (EIP) Panel's response to the concerns expressed by the Council over the draft London Plan.

The Panel noted that the EIP Panel had now submitted its report on the London Plan to the Mayor for London for his consideration.

It was explained that the Mayor, in considering the EIP Report, would decide on whether or not to include any of the amendments made by the EIP Panel to the London Plan and, subject to any direction by the Secretary of State, publish the final London Plan. It was expected that he would move quickly towards adoption of the Plan and include the report of the EIP Panel.

It was pointed out that there was no further role for the Boroughs for involvement and that the Mayor for London's decision would be final. Additionally, the Government Office for London (GOL) could only reject the London Plan if correct procedures had not been followed or that the Plan was contrary to the guidance issued by Central Government.

Members were also informed that once the London Plan had been approved, all London local authorities' Unitary Development Plans (UDPs) would have to be in general conformity to the Mayor's Plan, otherwise they could not be adopted.

A Member stated that she did not agree with the findings of the EIP Panel and was of the view that, whilst there was no further scope for involvement, Members concerns ought to be placed on record on the basis that they were accountable to the electorate of Harrow.

The Portfolio Holder for Partnership and Property stated that there was a due process to be followed, that there was a Strategic London-wide body which gave the Mayor for London powers to make changes to the Plan. He added that the only recompense available was if the Mayor deviated from the Panel's recommendations. In the light of the fact that no further representations could be made within the constraints of the procedure for approval, he added that the report ought just to be noted without any further observations. The Chair was of the same view.

The Member responded and went on to mention that whilst she agreed with some of EIP Panel's findings on affordable housing, she did not agree with the following:

- Growth Assumptions - the views expressed in para 6.2(iii) of the transport infrastructure
- Housing Supply – para 6.4 requiring 23,000 additional dwellings annually with a possible review raising the figure to 30,000 which she felt would be very difficult for Harrow to achieve
- Cricklewood/Brent Cross – the approach taken would continue to undermine the vitality and viability of Harrow

Another Member enquired about the EIP Panel's views on Cricklewood and how this would be decided through development of the Sub Regional Development Framework as set out on page 9 of the officer's report. In response, the Chief Planning Officer stated that he hoped that consultation with the neighbouring boroughs would take place and that the regional framework would allow process representations to be made, especially in regard to the Cricklewood sidings.

Resolved to RECOMMEND: (to Portfolio Holder)

That the response of the EIP Panel to Harrow's concerns over the draft London Plan be noted.

[REASON: To update the Members on the London Plan.]

RECOMMENDATION 5 - Receipt of UDP Inspector's Report - Next Steps and Timetable to Adoption

The Panel received a report of the Chief Planning Officer which included brief comments on the Inspector's Report, the next steps and the anticipated timetable up to adoption of the Harrow Unitary Development Plan (HUDP). The report also referred to the parallel process of approval of the London Plan and commented on the implications of the new Local Development Framework.

In agreeing the timetable set out in the report, the Chair stressed the need to keep to the timetable and to ensure that the HUDP was submitted to Council for adoption on 29 April 2004, otherwise there would be further delay and the Plan would not be adopted until the July 2004 meeting of the Council. Members also agreed to hold two additional meetings in November 2003 in order to consider, in detail, the Inspector's recommendations and the Council's response to those recommendations.

The Chair was of the view that the lead in period to the preparation of the UDP was too long. In response, the Chief Planning Officer stated that the new legislation for the new system for Local Development Framework Plans, which was currently going through Parliament, would place a far greater burden on local authorities to produce their Local Development Framework Plans in a much shorter timescale. This, he added, would have resource implications for local authorities, including Harrow.

Resolved to RECOMMEND: (to Portfolio Holder)

(1) That the receipt of the Inspector's Report on objections to the draft replacement Harrow Unitary Development Plan be noted;

(2) that the timetable leading to adoption of the Harrow Unitary Development Plan by mid 2004 be agreed and that two additional meetings of the Panel be held on 12 and 18 November 2003 in order to consider the Inspector's Report and to decide what action to take in each of the Inspector's recommendations.

[REASON: To expedite adoption of the replacement Harrow Unitary Development Plan after completion of all statutory procedures.]

PART II - MINUTES

50.

Attendance by Reserve Members:

RESOLVED: To note that there were no Reserve Members in attendance at the meeting.

51.

Declarations of Interest:

RESOLVED: To note that there were no declarations of personal or prejudicial interest from Members of the Panel in relation to the business on the agenda.

52.

Arrangement of Agenda:

The Chair pointed out that the officer's report on the UDP Inspector's Report (Recommendation 5 refers) before the Panel that evening was merely to agree the timetable and that a more detailed report setting out the Inspector's recommendations and the Council's response to those recommendations would be presented to the two additional meetings (12 and 18 November 2003) of the Panel.

RESOLVED: That all items be considered with the press and public present.

53.

Minutes:

RESOLVED: That the minutes of the meeting held on 10 July 2003, having been circulated, be taken as read and signed as a correct record.

54.

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).

55. **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 13 (Part 4E of the Constitution).
56. **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).
57. **References from Council and Other Committees/Panels:**
RESOLVED: To note that there were no references from Council and other Committees/Panels.

(Note: The meeting having commenced at 7.30 pm, closed at 8.15 pm)

(Signed) COUNCILLOR KEITH BURCHELL
Chair

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Meeting:	Unitary Development Plan Advisory Panel
Date:	Wednesday 12 th November 2003
Subject:	Harrow Unitary Development Plan – Consideration of The Inspector's Report on the Public Local Inquiry
Key decision	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder	Portfolio Holder for Planning, Development, Housing and Best Value
Status:	Part I (Public)
Ward:	All
Enclosures:	Appendix A - Schedule of Inspector's Recommendations and Suggested Responses

1. Summary

- 1.1 Following receipt of the Inspector's Report, consideration has been given to each of the recommendations. A suggested response is given for each recommendation. Whilst the overwhelming majority of recommendations are accepted, it is proposed that a small number should not be accepted, either in full or in part, for the reasons outlined. For those areas of the Plan where the Inspector has recommended that policies and reasoned justifications are to be substantially re-written, additional reports on these are being prepared. If the Panel agree the suggested responses contained within this report, the Council will later publish them as a Statement of Decisions, alongside the proposed modifications to the Plan that will be required.

2. Recommendations (for decision by the Cabinet)

- 2.1 To agree the Council's Statement of Decisions on the Recommendations contained in the Inspector's Report

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

3. Consultation with Ward Councillors

None. A copy of the Inspector's Report has been sent to all members of the Panel, and a copy placed in the Members' Library.

4. Policy Context (including Relevant Previous Decisions)

The Council is required to publish a statement of decisions on the recommendations in the Inspector's report, following the holding of the Public Local Inquiry into the replacement HUDP. Receipt of the Inspector's Report and a timetable through to

adoption of the new HUDP were considered at the Panel's meeting of 16 September 2003.

5. **Relevance to Corporate Priorities**

This report concerns a key aspect of the Council's statutory development plan, the replacement HUDP, and as such fundamentally concerns the Council's stated priority of enhancing the environment of the Borough.

6. **Background Information and options considered.**

- 6.1 The Council is required to decide what action to take on each of the Inspector's recommendations (and the two issues on which he has not made a recommendation). Importantly, it must state the reasons for its decision. The Inspector has made a large number of recommendations where he has suggested that no modification be made to the Plan. These have been scrutinised to ensure that their acceptance does not compromise the integrity of the Plan. The same applies to those recommendations made by the Inspector where he has merely endorsed a change to the Plan in line with Council-suggested Pre-Inquiry Changes (PICs). The Inspector has accepted the vast majority of the Council's pre-inquiry changes, whilst examination of those PICs which he has not endorsed has concluded that the Council's position has not been weakened.
- 6.2 Attention has understandably primarily been focused on those recommendations where the Inspector has suggested modifications to the Plan. Those recommendations which should not be not fully accepted by the Council are highlighted (by shading) in the Appendix to this report, as follows:-

- 1) SD1: Quality of Design (Page 4 of Appendix A / Page 28 of Inspector's Report (IR))
- 2) SEM2 & Para 2.90 : Hierarchy of Town Centres(Page 7 of Appendix A/Page 39 of IR)
- 3) EP46 and Para 3.139: Open Space (Page 16 of Appendix A / Page 78 of IR) *
- 4) D13 and D14: Locally Listed Buildings (Page 19 of Appendix A / Page 89 of IR)
- 5) D26 and Paras 4.81-4.82: Telecommunications Development (Page 20 of Appendix A and Page 94 of IR)
- 6) T13 & Schedule 13: Parking Standards (Page 25 of Appendix A / Page 107 of IR)*
- 7) T14 & Para 5.32: New Development and On-Street Parking (Page 25 of Appendix A / Page 112 of IR)*
- 8) H19: Mobility and Lifetime Homes (Page 30 of Appendix A / Page 136 of IR) *
- 9) R5 & Para 8.28: Outdoor Sports Facilities (Page 34 of Appendix A / Page 155 of IR) *
- 10) R12: Protecting Arts, Culture, Entertainment and Leisure Facilities (Page 35 of Appendix A / Page 157 of IR) *
- 11) C2 (C18 in First Deposit Draft): Provision of Social and Community Facilities (Page 36 of Appendix A / Page 162 of IR)
- 12) C20 (C19 in First Deposit Draft): Access to Buildings and Public Spaces (Page 38 of Appendix A / Page 169 of IR) *
- 13) Proposal Site 6: Harrow on the Hill Station and Land in College Road and Lowlands Road (Page 41 of Appendix A / Page 184 of IR) *
- 14) Site of Nature Conservation Importance – Wood Farm (Page 49 of Appendix A / Page 200 of IR)
- 15) Site Of Nature Conservation Importance- Limes House (Page 49 of Appendix A / Page 201 of IR).

For some of the recommendations, the suggested response sets out fully the reasons why the recommendation should not be accepted, and the suggested re-wording, (if appropriate). For others (indicated by an asterisk *), a fuller explanation will be set out in a future report to the Panel. (Where the Council accepts the Inspector's recommendations, and new policies, or partial changes to policies, and reasoned

- justifications are being prepared, these will also be reported to a future meeting of the Panel.)
- 6.3 The Panel is invited to discuss the reasons why the Inspector's recommendations should not be accepted in full, and agree the Council's response to all the Inspector's recommendations to form the Statement of Decisions that the Council must prepare on the Inspector's Report.

7. **Consultation**

- 7.1 All objectors and agents who objected to, or commented on, the first and/or revised Deposit HUDPs were advised of the publication of the Inspector's Report. Subsequently, those people attending the Inquiry, who had not previously been contacted were also advised. The Council's Statement of Decisions, together with the Proposed Modifications to the Plan, will need to be placed on deposit early next year.

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. **Conclusions**

- 10.1 Consideration of the recommendations in the Inspector's Report is an important stage in the process for adopting the new HUDP. This is particularly so for areas of the Plan where the Inspector has recommended significant changes. In preparing a considered response to the Inspector's recommendations, the Council is also very mindful of the pending publication of the London Plan. In developing revised policies in response to the Inspector's recommendations due regard is being paid to the need for the Replacement HUDP to be in general conformity with the London Plan, and the suggested response in Appendix A reflect these considerations. Accordingly, Counsel's opinion has been sought on the development of appropriate revised policies and reasoned justifications.

11. **Background Papers**

- 11.1 Inspector's Report on Replacement Harrow UDP, the Planning Inspectorate, 13 August 2003.
Revised Deposit Replacement Harrow Unitary Development Plan – March 2002
PPG3 Housing – Influencing the size, type and affordability of housing – Government consultation - July 2003
Draft London Plan – June 2002
London Plan EIP Panel Report – July 2003

12. **Author**

- 12.1 Dennis Varcoe ext 2460, dennis.varcoe@harrow.gov.uk

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CHAPTER 1 – WHOLE PLAN AND INTRODUCTION

APPENDIX A

UDP Policy/ Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
Whole Plan	006/0339 Mr P Jeffrey	13	I recommend no modification to the Plan.	Accepted	No modification required.
General - economic activity	090/1121 Tesco Stores Ltd	14	I recommend no modification to the Plan.	Accepted	No modification required.
General - define “sustainable”	090/1122 Tesco Stores Ltd 130/1382 N Waterhouse 130/1383 N Waterhouse	15	I recommend that the Plan be modified by the inclusion in the Introduction of a definition of ‘sustainable’ or ‘sustainability’, as indicated above.	Accepted	A clearer definition should reduce the scope for confusion about the Plan’s use of the term.
Para 1.9 - Supplementary Planning Guidance (SPG)	078/1095 Mr J Carpenter (Harrow FOE)	15	I recommend no modification to the Plan.	Accepted	No modification required.

CHAPTER 2 – STRATEGIC CONTEXT AND PART 1 POLICIES

UDP Policy/ Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
Introduction	122/1293&1296 Housing consortium	16	I recommend no modification to the Plan.	Accepted	No modification required.
National PPG Notes -The SE & London Para 2.10: Regional Context	043/0863 Planning for Older People (POP), Age Concern Harrow	17	I recommend no modification to the Plan.	Accepted	No modification required.
Para 2.16: Vision for Harrow	065/0585 Peter D Kyte Associates	17	I recommend no modification to the Plan.	Accepted	No modification required.
Para 2.17 and Key Diagram (and PIC01)	057/0178R Mr J Dobson	17	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 01.	Accepted	No further modification required.
Para 2.18: Population Context	078/1075 Mr J Carpenter 122/1299 Housing consortium	18	I recommend no modification to the Plan.	Accepted	No modification required.
Paras 2.23 – 2.33: Strategic Objectives	006/0323 Mr P Jeffrey 006/0325 Mr P Jeffrey 065/0586 Peter D Kyte Associates 090/1122 Tesco Stores Ltd 122/1300 Housing consortium	19	I recommend no modification to the Plan.	Accepted	No modification required.
Para 2.34: Indicators and Targets	006/0326 Mr P Jeffrey 013/0352 Mr P H Poole 022/0427 Mr J Cobb 023/0430 Pauline Schofield 007/0725 Harrow Nature Conservation Forum (HNCF) 032/0775-0776 E D Chambers 035/0789 The Empty Homes Agcy.	22	I recommend no modification to the Plan.	Accepted	No modification required.

Para 2.34: Indicators and Targets (Cont)	114/1210 Bryant Homes (Thames Vall.) Ltd & Bryant Lifestyle Homes 122/1301 Housing consortium 007/0015R-0016R H.N.C.F. 035/0168R The Empty Homes Agy. 057/0179R-0180R Mr J Dobson	22	I recommend no modification to the Plan	Accepted	No modification required.
S1 and Paras 2.35-2.38 : The Form of Development and Pattern of Land Use (and PIC02, PIC03 and PIC04)	007/0726 H.N.C.F. 016/0743 NHS Executive (North Thames Regional Office) 028/0759 Mr G Gitter 078/1077 Mr J Carpenter (Harrow FOE) 007/0020R Harrow Nature Conservation Forum (HNCF) 007/0022R-0023R HNCF 007/0025R-0026R HNCF 016/0159R NHS Executive (North Thames Regional Office) 122/0213R Housing consortium	25	I recommend that the Plan be modified by the addition, at the end of para 2.35, of the words " and which takes due account of current population trends ", and in accordance with Pre-Inquiry Changes 02, 03 and 04".	Accepted	The Recommendation reflects the Pre-Inquiry changes and adds a minor improvement of wording.
SEP2 and Para 2.42 : Water	006/0324 Mr P Jeffrey 013/0353 Mr P H Poole 053/0994 Watling Ch. Com. Forest	25	I recommend no modification to the Plan.	Accepted	No modification required.
SEP3 and Paras 2.46 and 2.49: Waste – General Principles	006/0327-0328 Mr P Jeffrey 013/0354 Mr P H Poole 077/0660 Roxborough Road Residents Association 044/0875 Greater London Authority	26	I recommend no modification to the Plan.	Accepted	No modification required.
SEP4 and Para 2.52: Biodiversity & Natural Heritage	006/0329 Mr P Jeffrey	26	I recommend no modification to the Plan.	Accepted	No modification required.

<p>SEP5 and Para 2.55: Structural Features (and PIC05)</p>	<p>007/0727 Harrow Nature Conservation Forum 007/0031R Harrow Nature Conservation Forum</p>	<p>27</p>	<p>I recommend the Plan be modified by the substitution for Policy SEP5, para O of the following:-</p> <p>"O) SSSIs and other sites of nature conservation importance, namely the Countryside Conservation Area, sites of local and metropolitan importance and sites pending such designation"</p>	<p>Accepted</p>	<p>The recommended wording covers SSSI's and gives more recognition/importance to sites which ought to be protected and those which may become designated sites deserving protection.</p>
<p>SD1: Quality of Design</p>	<p>065/0587 Peter D Kyte Associates 028/0760 G Gitter 121/1289 BT plc</p>	<p>28</p>	<p>I recommend that the Plan be modified by the substitution in Policy SD1 of "an appropriate standard" for "a high standard", of "a suitable contribution" for "a positive contribution", of "facilitates access" for "facilities access", and "does not harm the character or appearance of its setting" for "enhances the character and appearance of the Borough".</p>	<p>Not accepted</p>	<p>The recommended modification is inconsistent with the Government's stated aim to promote higher standards of urban design, and would do little to improve the quality of new development . It is accepted that the test requiring that development makes a "positive contribution" to the quality of the built environment may be too rigorous. The Inspector's recommended change, however, would not provide adequate guidance for Development Control. A better alternative" ..WILL SEEK AN APPROPRIATE STANDARD OF DESIGN WITH THE AIM OF IMPROVING... would be more consistent with PPG12</p>

SD3 and Para 2.63: Mixed-Use Development	072/0609 Wm. Morrison Supermarkets 044/0878 Greater London Auth. 122/1305 Housing consortium	29	I recommend no modification to the Plan	Accepted	No modification required
ST1: Land Uses and the Transport Network	062/1032 Government Office for London Planning Division 072/0204R Wm. Morrison- Supermarkets	30	I recommend that the Plan be modified by deleting, in Policy ST1, the words "the policies in the Harrow Local Transport Strategy and in particular, with" and sub- para D. Consequential alteration of text paras 2.64 and 2.65 should also be made to explain that the Policy Principles are to be followed up in the Transport Strategy.	Accepted	The suggested amendment to the policy will remove any uncertainty and improve its clarity.
ST2: Traffic Management	032/0774 E D Chambers 078/1078 Mr J Carpenter (HarrowFoE) 116/1256 The Pinner Association	31	I recommend no modification to the Plan	Accepted	No modification required
ST3 London-Wide Highway Network	018/0416 Laurence Cox 020/0422 Russell Kane 033/0518 S E Spells 034/0522 H J Spells 046/0536 Pamela Lea 047/0540 Deborah Mallett 048/0544 Miss D H Holburn 049/0548S Pack 070/0605 B Moorthouse 052/0987 C J Wayman 052/0988 C J Wayman 085/1107 J M Kerr 092/1136 Ros Shaw 093/1140 Mrs Rambai Kami 094/1144 Barry Gilbert 095/1148 Mr J Rawal 096/1152 Christine Allain 097/1156 Mr & Mrs Menahem 098/1160 Mrs P Rosenberg 099/1164 J Fernandes 100/1168 Z Wadood	33	I recommend no modification to the Plan	Accepted	No modification required

ST3 London-Wide Highway Network (Cont)	102/1176 Mr T Selvarajah 103/1180 Mr, Mrs & Mstr Marcampillai 104/1184 M C Clapinson 105/1188 P Pindoria 106/1192 D V Patel 107/1196 P Simmonds 108/1200 John and Kathleen Murphy 109/1204 A Barretto 126/1366 David Leboff 128/1376 E Coppin 131/1385 V & K Hirani 137/1450 Mansukh Vekaria 060/1467 Mrs Assani	33	I recommend no modification to the Plan	Accepted	No modification required
ST4: London-Wide Transport Investment	081/0666 Mr P Scott 053/1000 Watling Ch. Com. Forest	34	I recommend no modification to the Plan	Accepted	No modification required
ST5: London-Wide Traffic Restr. Props.	005/0685 Mrs M Stapleton	34	I recommend no modification to the Plan	Accepted	No modification required
SH1 and Paras 2.82 and 2.83: Housing Provision and Housing Need	026/0437 House Builders Federation 074/0618 CPRE London 035/0791 The Empty Homes Agency 062/1051 Government Office for London Planning Division 114/1211 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 122/1303 Housing consortium 035/0169R The Empty Homes Agency 145/0223R Laing Homes 145/0224R Laing Homes	36	I recommend that the Plan be modified by the substitution, in Policy SH1, for "the Borough's residents" of " prospective occupants ", by the substitution in Policy Criterion C of " empty property " for "empty homes" and the addition at the end of Criterion E of " shared ownership accommodation ". The supporting text should be revised generally on the lines I have indicated and specifically detailing an aim to exceed the relevant capacity estimate if possible, in the interests of making maximum housing provision to alleviate a likely continuing unsatisfied demand in all sectors, more precise details as to which should be given. Further supporting information should be provided, including a reference to Table 13 of the Housing Capacity Study, and its implications for additional development.	Accepted	The proposed modification will assist in clarifying the policy.

SH2 : Housing Types and Mix	114/1212 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 115/1247 Martin Grant Homes (UK) Ltd 122/1304 Housing consortium 145/0225R Laing Homes	37	I recommend that the Plan be modified by the substitution for Policy SH2 of the following:- 'The Council will encourage the provision of a range of types and sizes of housing to meet the needs of all prospective occupants, to enhance social inclusion and to promote mixed and balanced communities.' The supporting text should be expanded to include an acknowledgement that site specific considerations, marketability and viability might well affect the extent to which Policy aims could practically be advanced in the individual case.	Accepted	The proposed modification will assist in clarifying the policy.
SEM1 and Para 2.88:Development and the Borough's Regeneration Strategy (and PIC07)	065/0588 Peter D Kyte Associates 072/0610 Wm. Morrison Supermarkets 062/1037 Government Office for London, Planning Division 122/1306 Housing consortium 007/0037R Harrow Nat. Co. Forum	38	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 07.	Accepted	No further modification required.
SEM2 and Para 2.90: Hierarchy of Town Centres	116/1257 The Pinner Association 116/1258 The Pinner Association	39	I recommend that the Plan be modified by the inclusion of " after consultation with local community organisations ", before "the Council will consider reclassifying a centre...", in the eighth sentence of para 2.90.	Accepted in part	The suggested change will improve the policy but the use of the word 'local' may give the impression that consultation will be limited to a certain category. A further modification is therefore necessary to embrace wider public engagement in the planning process. It is suggested that the word ' including .. be added in the Inspector's wording after the word 'consultation'.

SEM3: Proposals for New Employment- Generating Development	006/0330 Mr P Jeffrey 025/0436 North West London Chamber of Commerce	39	I recommend no modification to the Plan	Accepted	No modification required
SR2: Arts, Cultural, Entertainment, Tourist and Recreational Activities	006/0331 Mr P Jeffrey 013/0356 Mr P H Poole	40	I recommend no modification to the Plan	Accepted	No modification required
SI1 and Para 2.107: Implementation and Resources	028/0768 G Gitter 078/1080 Mr J Carpenter (Harrow FoE)	40	I recommend no modification to the Plan	Accepted	No modification required

CHAPTER 3 – ENVIRONMENTAL PROTECTION AND OPEN SPACE

UDP Policy/ Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
New Policy	013/0357 Mr P H Poole	41	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	004/0393-0395 Jackie Lindop	41	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	027/0490 English Nature (Essex, Hertfordshire and London Team)	42	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	053/0996 Watling Chase Community Forest	42	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	053/0997-0999, & 1005 Watling Chase Community Forest	43	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	057/0577 Mr J Dobson	43	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	062/1072 Government Office for London, Planning Division 064/1208-1209 Health & Safety Executive (HSE)	43	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	132/1400 Environment Agency	44	I recommend no modification to the Plan.	Accepted	No modification required.
National & Strategic Context, Paras 3.2 - 3.12	O44/0894 Greater London Authority 007/0042R Harrow Nature Conservation Forum	44	I recommend no modification to the Plan.	Accepted	No modification required.
Paras 3.4 and 3.4a (and PIC08 & PIC09)	057/0181R Mr J Dobson 057/0288R Mr J Dobson	45	I recommend that the Plan be modified in accordance with Pre-Inquiry Changes 08 and 09.	Accepted	No further modification required.

EP7 and Paras 3.17-3.19	075/0629 ETSU for the DTI 114/1213 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 007/0044R Harrow Nature Conservation Forum	46	I recommend that the Plan be modified by the substitution for Policy EP7 of the following:- The Council will require new developments to be so designed as to maximise the potential, to the extent that this is practicable, viable and causes no undue harm to the environment or residential amenities, of renewable energy schemes such as make use of solar energy, photovoltaics and natural ventilation.”. Consequential amendments of the supporting text should also be made.	Accepted	The suggested modification would clarify the policy.
EP8 and Para 3.25: Energy Supply and Generation (and PIC10 & PIC11)	075/0631 ETSU for the DTI 053/1001 Watling Chase Community Forest 007/0050R Harrow Nature Conservation Forum 057/0182R Mr J Dobson	47	I recommend that the Plan be modified by the deletion of Policy EP8 and its supporting text.	Accepted	EP7 already encourages the use of renewables & is therefore surplus to requirements
EP10 and Para 3.31: Water Quality, Supply and Disposal (and PIC12)	078/1083 Mr J Carpenter (Harrow FoE) 007/0052R Harrow Nature Conservation Forum 007/0053R Harrow Nature Conservation Forum 057/0183R Mr J Dobson 132/0216R Environment Agency 007/0236R Harrow Nature Conservation Forum	48	I recommend that the Plan be modified by the addition, in Policy EP10, para B, of the words “ or ecological ” between “water” and “quality”. Para 3.31 should be re-written as indicated above.	Accepted	Reflects PIC12.
EP11 and Para 3.34: Sustainable Urban Drainage (and PIC13)	026/0438 House Builders Federation 114/1214 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 135/1441 Sainsbury's Supermarkets Ltd 007/0056R Harrow Nat. Con. Forum 057/0184R Mr J Dobson 114/0211R Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes	49	I recommend that Policy EP11 of the Plan be modified by the addition, at the end of the Policy wording, of “ where practicable ” and in accordance with Pre-Inquiry Change 13.	Accepted	Reflects PIC13.

		49	I recommend no modification to the Plan.	Accepted	No modification required.
EP12 and Paras 3.42 and 3.44: Development within Floodplains	006/0334 Mr P Jeffrey 007/0058R Harrow Nature Conservation Forum 007/0059R Harrow Nature Conservation Forum	50	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 14.	Accepted	No further modification required.
EP13 and Paras 3.46 and 3.47: Control of Surface Water Run-Off (and PIC14)	053/1002 Watling Chase Community Frest 114/1216 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 007/0060R-0061R Harrow Nature Conservation Forum 057/0185R Mr J Dobson	51	I recommend no modification to the Plan.	Accepted	No modification required.
Para 3.48: Culverting and Deculverting	007/0063R-0064R Harrow Nature Conservation Forum	51	I recommend no modification to the Plan.	Accepted	No modification required.
EP16: Water Conservation	135/1442 Sainsbury's Supermarkets Ltd	51	I recommend no modification to the Plan.	Accepted	No modification required.
Para 3.54: Waste Management, Disposal and Recycling Facilities (and PIC15)	132/1401 Environment Agency 132/0217R Environment Agency	52	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 15.	Accepted	No further modification required.
EP21: Use of Previously-Developed Land	026/0439 House Builders Federation 007/0729 Harrow Nature Conserv. Forum 090/1120 Tesco Stores Ltd 114/1217 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 117/1279 Bellway Homes Ltd 122/1307 Housing consortium 007/0070R Harrow Nature Conservation Forum 122/0214R Housing consortium 145/0226R Laing Homes	53	I recommend no modification to the Plan.	Accepted	No modification required.
EP22: Vacant and Disused Land and Buildings	035/0797 The Empty Homes Agency 114/1218 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 122/1308 Housing consortium	53	I recommend no modification to the Plan.	Accepted	No modification required.

EP23 and Paras 3.70 and 3.72b: Contaminated Land	114/1219 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 007/0072R Harrow Nature Conservation Forum	54	I recommend no modification to the Plan.	Accepted	No modification required.
EP24: Air Quality	006/0332 Mr P Jeffrey 013/0358 Mr P H Poole	54	I recommend no modification to the Plan.	Accepted	No modification required.
Para 3.79: Noise	005/0689 Mrs M Stapleton 005/0005R Mrs M Stapleton	55	I recommend no modification to the Plan.	Accepted	No modification required.
Para 3.85: Nature Conservation	057/0564 Mr J Dobson 007/0077R Harrow Nature Conservation Forum	55	I recommend no modification to the Plan.	Accepted	No modification required.
EP26 and Paras 3.87-3.89 (and PIC16)	057/0565-0566 Mr J Dobson 076/0635 Herts and Middlesex Wildlife Trust 053/1003 Watling Chase Community Forest 007/0080R Harrow Nature Conservation Forum 057/0186R Mr J Dobson	56	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 16.	Accepted	No further modification required.
EP27 and Paras 3.90 and 3.91: Species Protection (and PIC 17,PIC18 & PIC 19)	027/0488 English Nature (Essex, Hertfordshire and London Team) 057/0567-0568 Mr J Dobson 057/0570 Mr J Dobson 062/1041 Government Office for London, Planning Division 007/0081R Harrow Nature Conservation Forum 027/0164R English Nature (Essex, Hertfordshire and London Team) 057/0187R Mr J Dobson	57	I recommend that the Plan be modified in accordance with Pre-Inquiry Changes 17,18 and 19.	Accepted	No further modification required.

EP28 and Paras 3.92-3.98: Conserving and Enhancing Biodiversity (and PIC20, PIC21, PIC22, PIC23 and PIC24)	026/0440 House Builders Federation 027/0489 English Nature (Essex, Hertfordshire and London Team) 057/0569 Mr J Dobson 057/0571-0576 Mr J Dobson 007/0730 Harrow Nature Cons. Forum 114/1220 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 117/1280 Bellway Homes Ltd 133/1430 Harrow & Hillingdon Geol. Soc. 007/0083R-0084R, 0086R-0087R & 0091R Harrow Nature Conservation Forum 057/0188R-0192R Mr J Dobson	59	I recommend that the Plan be modified in accordance with Pre-Inquiry Changes 20, 21, 22, 23 and 24, with the addition of “ land adjacent to ” before “Harrow Weald Common” in PIC24, and by the substitution for Policy EP28 para F of the following:- “F) Ensuring that any loss of habitat, e.g. woodland, wetland etc., is compensated for by provision of at least an equivalent area of land of equivalent habitat quality under the terms of a planning obligation”	Accepted	The change suggested for EP28 para F will give clarity to the policy and ensure that ‘equivalent habitat quality’ is sought if a habitat is replaced.
Para 3.99: Trees	013/0359 Mr P H Poole	59	I recommend no modification to the Plan.	Accepted	No modification required.
Text Map 3: Green Corridors	082/0673 Pinner South Residents Association 007/0731 Harrow Nature Conservation Forum	60	I recommend no modification to the Plan.	Accepted	No modification required.
EP29: Tree Masses and Spines	078/1086 Mr J Carpenter (Harrow FoE)	60	I recommend no modification to the Plan.	Accepted	No modification required.
EP30 and Para 3.107 (and PIC25)	013/0360 Mr P H Poole 057/0193R Mr J Dobson	61	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 25.	Accepted	No further modification required.
EP32 and Paras 3.111 and 3.112: Acceptable Green Belt Land Uses	013/0361 Mr P H Poole 080/0665 Headstone Residents' Assoc. 007/0732 Harrow Nature Conservation Forum 015/0739 Defence Estates, South East and Germany 122/1309 Housing consortium	62	I recommend no modification to the Plan.	Accepted	No modification required.

EP32 and Paras 3.111 and 3.112: Green Belt land at Stanmore Hill	066/0600 Laura Dubiner	63	I recommend no modification to the Plan.	Accepted	No modification required.
EP32 and Paras 3.111 -3.112:Green Belt land at Magpie Hall Road and Heathbourne Road, Stanmore	073/0616 Ms P Goletto 083/0674-0684 Mrs Waldorf 119/1284 Ms P Goletto 119/1355-1364 Ms P Goletto	66	I recommend no modification to the Plan.	Accepted	No modification required.
EP32 and Paras 3.111 & 3.112: Green Belt land W. of Headstone Lane	091/1125 Harrow Community Sports Ltd 091/1126 Harrow Community Sports Ltd	67	I recommend no modification to the Plan.	Accepted	No modification required.
EP33: Development in the Green Belt	122/1310 Housing consortium	68	I recommend no modification to the Plan.	Accepted	No modification required.
EP34: Extension to Buildings in the Green Belt	074/0619 CPRE London	68	I recommend no modification to the Plan.	Accepted	No modification required.
EP35: Major Developed Sites in the Green Belt - General	053/1004 Watling Chase Community Forest 078/1097 Mr J Carpenter (Harrow FoE) 007/0241R Harrow Nature Conservation Forum	69	I recommend no modification to the Plan.	Accepted	No modification required.
EP35 and Proposals Map designation: Harrow College, Weald Campus	061/1020 Harrow College 061/1021 Harrow College 061/0201R Harrow College	70	I recommend that the Plan be modified by the addition to para 3.117 of the following:- The development envelope for Harrow College (Weald Campus), indicating substantially the existing extent of development, is shown on the Proposals Map	Accepted	A similar reference to Harrow College is included in para 9.29 of the Plan.

	EP37: Re-Use of Existing Buildings in the Green Belt	076/0634 Herts and Middlesex Wildlife Trust	71	I recommend no modification to the Plan.	Accepted	No modification required.
EP38 and Para 3.121: Recreational Uses in the Green Belt	013/0362 Mr P H Poole		71	I recommend no modification to the Plan.	Accepted	No modification required.
EP40: Buildings for Indoor Recreation Use in the Green Belt	013/0363 Mr P H Poole		71	I recommend no modification to the Plan.	Accepted	No modification required.
EP41 and Paras 3.125 and 3.126: Green Belt Man. Strategy	013/0364 Mr P H Poole 007/0095R Harrow Nature Conservation Forum		72	I recommend no modification to the Plan.	Accepted	No modification required.
EP41A: Watling Chase Community Forest (and PIC26)	057/0194R Mr J Dobson		72	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 26	Accepted	No further modification required.
EP42: Green Belt and Metropolitan Open Land Fringes	122/1311 Housing consortium		73	I recommend no modification to the Plan.	Accepted	No modification required.
EP43: Metropolitan Open Land – Gen.	013/0365 Mr P H Poole 122/1312 Housing consortium		74	I recommend no modification to the Plan.	Accepted	No modification required.
EP43: Metropolitan Open Land - Harrow-on-the-Hill covered reservoir	045/0531 Three Valleys Water plc		75	I recommend no modification to the Plan.	Accepted	No modification required.
EP43: Metropolitan Open Land - land alongside R. Pinn	004/0379 Jackie Lindop		75	I recommend no modification to the Plan.	Accepted	No modification required.

EP44: Additional Building on Met. Open Land	045/0532 Three Valleys Water plc 122/1313 Housing consortium	76	I recommend no modification to the Plan.	Accepted	No modification required.
EP45: Green Chains	006/0340 Mr P Jeffrey 013/0366 Mr P H Poole 079/0662 Patrick Murphy 007/0733 Harrow Nature Cons. Forum 078/1098 Mr J Carpenter (Harrow FoE)	77	I recommend no modification to the Plan.	Accepted	No modification required.
EP46 and Para 3.139: Open Space	006/0336 Mr P Jeffrey 006/0337 Mr P Jeffrey 013/0367 Mr P H Poole 125/1353 Old Lyonians Association 057/0195R Mr J Dobson	78	I recommend that the Plan be modified by the addition, at the end of Policy EP46, of the words " unless the site is surplus to requirements or suitable alternative provision is made available "	Accepted in part	The reasoned justification should be amended to reflect the Inspector's revised wording. It should also clarify why it is important to protect such areas, together with the exceptional circumstances under which the Council would permit non-recreational uses.
Text Map 4: Areas Currently Lacking a Local Park	006/0343 Mr P Jeffrey	78	I recommend no modification to the Plan.	Accepted	No modification required.
EP47 and Para 3.146: Public Open Space - General View land	007/0734 Harrow Nature Conservation Forum	79	I recommend no modification to the Plan.	Accepted	No modification required.
EP48 and Para 3.153: Informal Areas of Open Space (and PIC27)	013/0378 Mr P H Poole 042/0837 The Hatch End Association	80	I recommend no modification to the Plan.	Accepted	No modification required.
EP49 and Para 3.153: Informal Areas of Open Space (and PIC27)	007/0735 Harrow Nature Conservation Forum 057/0196R Mr J Dobson	80	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 27.	Accepted	No further modification required.

CHAPTER 4 – DESIGN AND THE BUILT ENVIRONMENT

UDP Policy/Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
General	004/0383 Jackie Lindop	81	I recommend no modification to the Plan.	Accepted	No modification required.
Para 4.10: Design and Built Env. Objectives (and PIC28)	143/0222R London Borough of Hillingdon	81	I recommend that the Plan be modified by the substitution of 'protection' for 'preservation' in para 4.10(iii).	Accepted	The revised wording more accurately reflects the guidance set out in PPG15
D4 and Paras 4.16, 4.17, 4.20, 4.27 & 4.28: Standard of Design and Layout	004/0396 Jackie Lindop 065/0589 Peter D Kyte Associates 069/0603 Bernard Burns 015/0741 Defence Estates, South East and Germany 035/0798 The Empty Homes Agency 043/0862 Planning for Older People (POP), Age Concern Harrow 062/1038 Government Office for London, Planning Division 114/1221 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 117/1281 Bellway Homes Ltd 122/1314 Housing consortium 145/0227R Laing Homes	84	I recommend that the supporting text to Policy D4 of the Plan be modified by the removal of reference to the provision of facilities for walking, cycling and public transport links as to be considered before the allocation of land for car parking.	Accepted	The reasoned justification in para 4.20 recognises the need to ensure that the layout of development and the location of parking spaces does not have an adverse impact on non car transport modes. The recommended modification would not detract from this objective.

D5 and Paras 4.33 and 4.37: New Residential Development -- Amenity Space and Privacy	006/034 Mr P Jeffrey 004/0382 Jackie Lindop 026/0441 House Builders Federation 065/0590 Peter D Kyte Associates 065/0591 Peter D Kyte Associates 122/1315 Housing consortium	85	I recommend that the Plan be modified by the deletion from Policy D5 of "Family accommodation should be located at ground floor wherever possible, with access to private garden space," and (in para C) "have rear gardens that respect the character of the surrounding area and". Consequential amendments should be made to the supporting text	Accepted	The recommended change is consistent with the design led approach advocated in PPG3 and advice to avoid inflexible planning standards. The issues would be better addressed in Supplementary Planning Guidance.
D6 and D7: Design in Emp. Areas, Retail Areas and Town Centres	054/0560 Mrs E Hill 054/0561 Mrs E Hill	86	I recommend no modification to the Plan.	Accepted	No modification required.
D8 and Para 4.37: Storage of Waste, Recyclable and Re-Usable Materials in New Developments	026/0442 House Builders Federation	86	I recommend no modification to the Plan.	Accepted	No modification required.
D9: Streetside Greenness and Forecourt Grenery	028/0761 G Gitter 032/0773 E D Chambers 042/0840 The Hatch End Association 007/0106R Harrow Nat. Con. Forum	87	I recommend no modification to the Plan.	Accepted	No modification required.
D10: Rear Garden Interface	028/0765 G Gitter 122/1316 Housing consortium	88	I recommend that the Plan be modified by the deletion of Policy D10 and its supporting text.	Accepted	Such land would still be subject to other policies in the Plan which would provide certain protection for such areas.
D11: Trees and New Development	026/0443 House Builders Federation 043/0861 Planning for Older People (POP), Age Concern Harrow 062/1039 Government Office for London, Planning Division 115/1243 Martin Grant Homes (UK) Ltd	88	I recommend no modification to the Plan.	Accepted	No modification required.

D13 and D14: Locally Listed Buildings	114/1222 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 114/1223 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes	89	I recommend that the Plan be modified by the deletion of the second sentence of Policy D13, with consequential amendments to para 4.52, and the removal, in its entirety, of Policy D14 and its supporting text	Accepted in part	The deletion of policy D14 and recommended change to D13 reflect the fact that there are no statutory powers to require the retention of locally listed buildings. It is considered, however, that para. 4.52 is consistent with PPG15 guidance encouraging their retention and should remain unchanged.
D15: The Use of Statutorily and Locally Listed Buildings (and P1C29)	114/1224 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes	90	I recommend that the Plan be modified by the deletion, in Policy D15, of the words 'or locally'.	Accepted	The amendment more accurately reflects the fact that locally listed buildings do not enjoy the same protection as those on the statutory list.
D16: Conservation Areas	013/0368 Mr P H Poole 045/0533 Three Valleys Water plc 028/0766 G Gitter 028/0767 G Gitter 062/1040 Government Office for London, Planning Division	91	I recommend no modification to the Plan.	Accepted	No modification required.
D18: Conservation Area Priority	114/1225 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 010/0155R-0156R English Heritage (London Region)	91	I recommend no modification to the Plan.	Accepted	No modification required.
D20 and Para 4.66 and Text Map 6: Historic Parks and Gardens	074/0620 CPRE London 074/0624 CPRE London 078/1099 Mr J Carpenter (Harrow FoE)	92	I recommend no modification to the Plan.	Accepted	No modification required.

D21: Ancient Monuments	078/1100 Mr J Carpenter (Harrow FoE)	92	I recommend no modification to the Plan.	Accepted	No modification required.
D22, D23 and D24: Sites of Archaeological Importance	030/0491 Mr R Miller 030/0492 Mr R Miller 030/0493 Mr R Miller	93	I recommend no modification to the Plan.	Accepted	No modification required.
D25: Lighting, Including Floodlighting	013/0369 Mr P H Poole 057/0198R Mr J Dobson	93	I recommend that the Plan be modified by an addition to the supporting text to Policy D25 indicating the circumstances in which planning permission is required for lighting.	Accepted	This will clarify situations where the policy will apply.
D26 and Paras 4.81 and 4.82: Telecommunications Development	013/0370 Mr P H Poole 013/0371 Mr P H Poole 039/0529 Railtrack 067/0601 Vodafone Ltd 121/1288 BT plc 123/1291 Crown Castle UK Ltd 123/1292 Crown Castle UK Ltd 067/1472 Vodafone Ltd	94	I recommend that the Plan be modified by the substitution for Policy D26, criterion A of the following:- " A) No satisfactory alternative, and less harmful, means of meeting the network coverage deficiency identified by the prospective operator is available to him: "	Accepted, subject to minor alteration.	The thrust of the recommended modification is accepted. However, the final two words are redundant and should be deleted
D31: Street Furniture	026/0444 House Builders Federation	95	I recommend no modification to the Plan.	Accepted	No modification required.
D32: Public Art and Design	115/1244 Martin Grant Homes (UK) Ltd	95	I recommend that the Plan be modified by the substitution for Policy D32 of the following:- "In considering applications for major development of significant public visibility, the Council will encourage, where the site location is favourable, the provision of works of art."	Accepted	The recommended change provides a clearer basis for the application of the policy.

CHAPTER 5 - TRANSPORT

UDP Policy/ Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
New Policy	003/0322 General Aviation Awareness Council	96	I recommend no modification to the Plan.	Accepted	No modification required.
Omission	004/0390 Jackie Lindop	96	I recommend no modification to the Plan.	Accepted	No modification required.
General	006/0344 Mr P Jeffrey	97	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	013/0355 Mr P H Poole	97	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	039/0530 Railtrack	97	I recommend no modification to the Plan.	Accepted	No modification required.
Transport Objectives - para 5.12	032/0782 E D Chambers	98	I recommend that the Plan be modified by the substitution for Objective (i) in para 5.12 of the following:- 'To help bring about a land use pattern where travel, particularly by car, is minimised, and where there is a realistic choice of mode of transport.'	Accepted	The suggested modification will make the objective clearer.
T6 and Paras 5.15a and 5.16: The Transport Impact of Development Proposals	013/0373 Mr P H Poole 043/0864 Planning for Older People (POP), Age Concern Harrow 044/0897 Greater London Authority 115/1249 Martin Grant Homes (UK) Ltd 122/1317 Housing consortium 043/0174R Planning for Older People (POP), Age Concern Harrow	99	I recommend no modification to the Plan.	Accepted	No modification required.

T7: Designing New Development with Good Access in Mind	072/0612 Wm. Morrison Supermarkets Ltd 115/1252 Martin Grant Homes (UK)	99	Recommendation - I recommend that the Plan be modified by the deletion of Policy T7 and supporting text.	Accepted	The matters will be effectively covered in Accessibility policies and Design Guidance required.
T8 and Para 5.20: Improving Public Transport Facilities	022/0428 Mr J Cobb 032/0781 E D Chambers 062/1042 GOL, Planning Division 037/0170R Strategic Rail Authority 039/0172R Railtrack	100	I recommend no modification to the Plan.	Accepted	No modification required.
Text Map 9: Bus Priority in Harrow	006/0342 Mr P Jeffrey	101	I recommend no modification to the Plan.	Accepted	No modification required.
Text Map 10: Public Transport Accessibility	013/0372 Mr P H Poole	101	I recommend no modification to the Plan.	Accepted	No modification required.
T8A and Para 5.21b: Rail Freight Transport (and PIC30)	039/0173R Railtrack 037/2998R Strategic Rail Authority	102	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 30, and further alteration to read: "The Strategic Rail Authority, Railtrack [now Network Rail] and the relevant Train Operating Companies will be consulted on any proposal."	Accepted	The pre-Inquiry change and the suggested amendment will improve the policy.
T9 and Para 5.22: Walking	043/0859 Planning for Older People (POP), Age Concern Harrow 122/1318 Housing consortium 130/1381 N Waterhouse 057/0197R Mr J Dobson 039/0530 Railtrack	102	I recommend no modification to the Plan.	Accepted	No modification required.
T10 and 5.24: Cycling	002/0310 Revd T Bradshaw 004/0392 Jackie Lindop 032/0772 E D Chambers 088/1111-1113 Rowlands Ave.Res. 116/1265 The Pinner Association 122/1319 Housing consortium	103	I recommend no modification to the Plan.	Accepted	No modification required.

T11: Cycle and Motor Cycle Parking in Public Places	002/0311 Revd T Bradshaw 072/0614 Wm Morrison Supermarkets	104	I recommend no modification to the Plan.	Accepted	No modification required.
T12: Relocating Available Roadspace and Managing Traffic	018/0417 Laurence Cox 020/0423 Russell Kane 033/0519 S E Spells 034/0523 H J Spells 046/0537 Pamela Lea 047/0541 Deborah Mallett 048/0545 Miss D H Holburn 049/0549 S Pack 070/0604 B Moorhouse 052/0894 CJ Wayman 092/1137 Ros Shaw 093/1141 Mrs Rambai Kami 094/1145 Barry Gilbert 095/1149 Mr J Rawal 096/1153 Christine Allain 097/1157 Mr & Mrs Menahem 098/1161 Mrs P Rosenberg 099/1165 J Fernandes 100/1169 Z Waddood 101/1173 Guys Newsagents 102/1177 Mr T Selvarajah 103/1181 Mr, Mrs & Mstr Marcampillai 104/1185 M C Clapinson 105/1189 P Pindoria 106/1193 D V Patel 107/1197 P Simmonds 108/1201 John and Kathleen Murphy 109/1205 A Barretto 126/1365 David Leboff 128/1375 E Copin 131/1384 V & K Hirani 137/1449 Mansukh Vekaria 060/1468 Mrs Assani	106	I recommend no modification to the Plan.	Accepted	No modification required.

T12: Relocating Available Roads space and Managing Traffic (Cont)	(The above objections are dealt with in relation to ST3: London-Wide Highway Network)	106	I recommend no modification to the Plan.	Accepted	No modification required.
	002/0312 Revd T. J. Bradshaw 079/0661 Patrick Murphy 032/0777 E D Chambers 062/1043 Government Office for London, Planning Division 078/1089 Mr J Carpenter (Harrow FoE) 085/1108 J M Kerr				
Text Map 13: Traffic Management Measures	018/0418 Laurence Cox 020/0425 Russell Kane 033/0520 S E Spells 034/0524 H J Spells 046/0538 Pamela Lea 047/0542 Deborah Mallett 048/0546 Miss D H Holburn 049/0550 S Pack 070/0607 B Moorhouse 052/0985 C J Wayman 092/1138 Ros Shaw 093/1142 Mrs Rambai Kami 094/1146 Barry Gilbert 095/1150 Mr J Rawal 096/1154 Christine Allain 097/1158 Mr & Mrs Menahem 098/1162 Mrs P Rosenberg 099/1166 J Fernandes 100/1170 Z Wadood 101/1174 Guys Newsagents 102/1178 Mr T Selvarajah 103/1182 Mr, Mrs & Mstr Marcampillai 104/1186 M C Clapinson 105/1190 P Pindoria 106/1194 D V Patel 107/1198 P Simmonds	107	I recommend no modification to the Plan.	Accepted	No modification required.

Text Map 13: Traffic Management Measures (Cont)	108/1202 John and Kathleen Murphy 109/1206 A Barretto 126/1368 David Leboff 128/1378 E Coppin 131/1387 V & K Hirani 137/1452 Manush Vekaria 060/1469 Mrs Assani	107	I recommend no modification to the Plan.	Accepted	No modification required.
T13 & Schedule 6: Parking Standards	072/0613 Wm. Morrison Supermarkets 072/0615 Wm. Morrison Supermarkets' Association 080/0663 Headstone Residents' Association 029/0769 R.C. Watson 090/1119 Tesco Stores Ltd 114/1226 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 116/1266 The Pinner Association 117/1282 Bellway Homes Ltd 122/1320-1321 Housing consortium 135/1445 -1446 Sainsbury's Supermarkets Ltd 072/0205R Wm. Morrison Supermarkets 007/0252R Harrow Nature Conservation Forum 007/0269R Harrow Nature Conservation Forum	110	I recommend that the Plan be modified by the substitution of a redrafted Policy T13, with appropriate supporting text, and Schedule 6, as indicated.	Accepted in part	A redraft will provide opportunity to improve the policy and bring it more in line with PPG13 and the Mayor's Transport Strategy, whilst paying due regard to PPG3. It is considered that clearer guidance can be given in a re-drafted policy which combines T13 and T14.
T14 and para 5.32: New Development and On-Street Parking	004/0391 Jackie Lindop 026/0445 House Builders Federation 026/0446 House Builders Federation 074/0617 CPRE London 032/0784 E D Chambers 122/1322 Housing consortium 007/0120R Harrow Nature Conservation Forum 145/0228R Laing Homes	112	I recommend that the Plan be modified by the substitution for Policy T14 of a replacement, along with suitable supporting text, to address the considerations indicated.	Accepted In part	It is considered that clearer guidance can be given in a re-drafted policy which combines T13 and T14. (see T13 above)

T15: Making Better Use of Parking Provision	115/1250 Martin Grant Homes (UK) Ltd	113	I recommend that the Plan be modified by the deletion of Policy T15 and its supporting text.	Accepted	Other plan policies will ensure full and effective use of resources.
T16: Public Car Parking	032/0780 E D Chambers	113	I recommend no modification to the Plan.	Accepted	No modification required.
T17 and Para 5.37: Station Car Parks	037/0527 Strategic Rail Authority 044/0937 Greater London Authority	114	I recommend that the Plan be modified by the deletion of Policy T17 and its supporting text.	Accepted	Deletion will not detract from the operational capability of rail operators.
T18 and Para 5.39: Servicing of New Developments	013/0376 Mr P H Poole 062/1044 Government Office for London, Planning Division	115	I recommend that the Plan be modified by the deletion from Policy T18 of "to the Council's adoptable standards so as to provide a safe environment and enable vehicles to leave, and rejoin, the public highway in forward gear".	Accepted	The suggested modification will not alter the intent of the policy.
T19: Servicing of New Developments	062/1045 Government Office for London, Planning Division 113/1135 Royal Mail Group plc	116	I recommend that the Plan be modified by the deletion in Policy T19 of "to current adoptable standards" and the insertion of " or improvement " after "provision".	Accepted	The suggested modification will improve the clarity of the policy.
T20: New Access – St Anns Road	078/1101 Mr J Carpenter (Harrow FoE)	116	I recommend no modification to the Plan.	Accepted	No modification required.
T21: New Link Road from Brember Road to Northolt Road	078/1102 Mr J Carpenter (Harrow FoE)	116	I recommend no modification to the Plan.	Accepted	No modification required.

CHAPTER 6 - HOUSING

UDP Policy/Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
New Policy	082/0667 Pinner South Residents Association 062/1060 Government Office for London, Planning Division	118	I recommend that the Plan be modified by the inclusion of a new Policy setting out the Council's overall approach to housing provision over ten years from the Plan forecast adoption date, showing how and to what extent it is proposed to exceed the estimated capacity limit of the 1999 Housing Capacity Study, so as to optimise provision for all identified needs.	Accepted	The introduction of a new policy will help set out the Council's overall approach more clearly.
New Policy	065?0599 Peter D Kyte Associates	118	I recommend no modification to the Plan.	Accepted	No modification required.
General	089/1114 Showmans Guild of GB.	119	I recommend no modification to the Plan.	Accepted	No modification required.
Para 6.3 - DTLR/LRC Household Projections	074/0621 CPRE London	119	I recommend no modification to the Plan.	Accepted	No modification required.
Para 6.17: National Policy Context	114/1234 Bryant Homes (Thames Valley) Ltd/Bryant Lifestyle Homes	120	I recommend that the Plan be modified by the deletion from para 6.17 of its final two sentences.	Accepted	The recommended deletion achieves conciseness and accuracy.
Policy 6.22: Housing Objectives	122/1324 Housing consortium	120	I recommend no modification to the Plan.	Accepted	No modification required.
Paras 6.24 and 6.25: New Housing Provision-Land Identified for Housing	114/1232-1233 Bryant Homes (Thames Valley) Ltd / Bryant Lifestyle 122/1325 Housing consortium	121	I recommend no modification to the Plan.	Accepted	No modification required.

H4 and Para 6.27: Housing Provision on Previously-Developed Land	026/0450 House Builders Federation 117/1276 Bellway Homes Ltd 122/1326 Housing consortium 125/1350 Old Lyonians Association 007/0123R Harrow Nature Conservation Forum 145/0284R Laing Homes	123	I recommend that the Plan be modified by the deletion of Policy H4 and its supporting text.	Accepted	The requirement for the Council to secure and maximise new housing provision on previously- developed land will still be covered by other policies in the Plan.
H5: Residential Density	004/0381 Jackie Lindop 026/0451 House Builders Federation 065/0592 Peter D Kyte Associates 044/0940 Greater London Authority 062/1046 GOL - Planning Division 114/1231 Bryant Homes (Thames Valley) Ltd/ Bryant Lifestyle Homes 115/1246 Martin Grant Homes (UK) 116/1268 The Pinner Association 117/1277 Bellway Homes Ltd	125	I recommend that the Plan be modified by the substitution for Policy H5 of the following:- "The Council will expect that residential densities in new development should be not less than 125 habitable rooms per hectare." The supporting text should be rewritten, as indicated above.	Accepted	The Inspector's recommendation creates a more concise policy.
H6: Affordable Housing and H7: Housing for Key Workers	017/0398-0400 Taywood Homes Ltd, Taywood Projects 017/0399 Taywood Homes Ltd, Taywood Projects 017/0400 Taywood Homes Ltd, Taywood Projects 017/0404-0415 Taywood Homes Ltd, Taywood Projects 026/0447 House Builders Federation 026/0449 House Builders Federation 026/0452-0461 House Builders Fed. 045/0535 Three Valleys Water plc 063/0583-0584 BAE Systems 015/0742 Defence Estates, South East and Germany 029/0770 R.C. Watson 114/1230 Bryant Homes (Thames Valley) Ltd & Bryant Lifestyle Homes 115/1245 Martin Grant Homes (UK)	131	I recommend that Policies H6 and H7, and supporting text, be deleted, to be replaced by a comprehensive single Policy setting out aims and procedures based on utilising the potential of all forms of affordable housing provision, to contribute to a Plan housing strategy over the Plan life, and in accordance with the advice of Circular 6/98.	Accepted	The drafting of a combined policy will provide an opportunity to provide policy guidance which considers changed circumstances since the policy was first included in the first deposit draft

H6: Affordable Housing and H7: Housing for Key Workers (Cont)	Ltd Ltd 117/1278 Bellway Homes Ltd 118/1283 McCarthy and Stone (Developments) Ltd 120/1285 Fairview New Homes Ltd 121/1287 BT plc 122/1327-1328 Housing consortium 125/1351 Old Lyonians Association 136/1447-1448 Barton Willmore Planning Partnership			The clear intentions of the policy remain following acceptance of the deletion.
H8 and Para 6.48: Dwelling Mix	004/0389 Jackie Lindop 114/1229 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 062/0203R Government Office for London, Planning Division 145/0229R Laing Homes	132	I recommend that the Plan be modified by the deletion of the final sentence of para 6.47.	Accepted
H9 and Para 6.50: Empty Homes and Property in the Borough	122/1330 Housing consortium	133	I recommend no modification to the Plan.	Accepted
H10 and Para 6.57: Conversions of Houses and Other Buildings to Flats	051/0558 Anne Francis 028/0762 G Gitter 035/0799 The Empty Homes Agency 044/0942 Greater London Authority 122/1331 Housing consortium 116/1473 The Pinner Association	134	I recommend that the Plan be modified by the deletion from Policy H10 of criterion (A). Consequential amendments of the supporting text, particularly para 6.53, and Schedule 8 should also be made.	Accepted
H11: Maintenance and Improvement to Exist. Housing Stock	028/0764 G Gitter	134	I recommend no modification to the Plan.	Accepted
H13: Houses in Multiple Occupation	028/0763 G Gitter	135	I recommend that the Plan be modified by the deletion from Policy H13 of proviso	Accepted

			(D).	
Para 6.68: Sheltered Accommodation	114/1228 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes	135	I recommend no modification to the Plan.	Accepted Accepted
H16: Hostels	044/0943 Greater London Authority	135	I recommend that the Plan be modified by the deletion from Policy H16 of proviso (C).	Accepted Accepted
H18: Access for Special Households with Particular Needs	122/1337 Housing consortium	136	I recommend no modification to the Plan.	No modification required. Accepted
H19: Mobility and Lifetime Homes	026/0462 House Builders Federation 043/0865 Planning for Older People (POP), Age Concern Harrow 062/1035 Government Office for London, Planning Division 114/1227 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes	136	I recommend that the Plan be modified by the deletion of Policy H19 and its supporting text.	Not accepted The Inspector cites in his Assessment on Policy C20 advice to include a Part 1 policy on inclusive access, supported by a series of Part 2 policies. It is considered that this is the most appropriate way to proceed, particularly in view of the London Plan. An appropriately-worded Part 1 policy and revised Part 2 policy should thus be prepared.

CHAPTER 7 – EMPLOYMENT, SHOPPING AND TOWN CENTRES

UDP Policy/ Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
New Policy	035/0800 The Empty Homes Agency	137	I recommend no modification to the Plan.	Accepted	No modification required.
General	065/0598 Peter D Kyte Associates	138	I recommend no modification to the Plan.	Accepted	No modification required.
Omissions - text, Policy EM5 and proposal sites 22, 26, 36, 38 and 39	062/1061-1066 Government Office for London, Planning Division 090/1115 Tesco Stores Ltd	138	I recommend no modification to the Plan.	Accepted	No modification required.
Introduction - para 7.5	082/0668 Pinner South Residents Association	139	I recommend no modification to the Plan.	Accepted	No modification required.
Employment, Town Centres and Shopping Objectives	090/1116 Tesco Stores Ltd	140	I recommend no modification to the Plan.	Accepted	No modification required.
National Policy Context - para 7.18	090/1117 Tesco Stores Ltd	139	I recommend that para 7.18 of the Plan be modified to indicate the extent of the Council's compliance with PPG3, para 42.	Accepted	Re-wording will help clarify the Council's position in relation to PPG3.
EM4 and Para 7.26: New Office Development	044/0944 Greater London Authority 113/1131 Royal Mail Group plc 122/1339 Housing consortium 135/1443 Sainsbury's Superm. Ltd 113/0207R Royal Mail Group plc 113/0210R Royal Mail Group plc	141	I recommend that the Plan be modified by the deletion of the final two sentences of Policy EM4, with consequential amendments to the supporting text.	Accepted	The Council accepts the deletion as it would remove uncertainty.

EM5: New Large Scale Retail and Leisure Development	032/0786 E D Chambers 062/1047 Government Office for London, Planning Division 090/1118 Tesco Stores Ltd 124/1346 Safeway Stores plc 134/1439 B&Q plc 124/0215R Safeway Stores plc 135/0218R Sainsbury's Supermarkets Ltd	144	I recommend that the Plan be modified by alterations to the supporting text to Policy EM5 as indicated above, namely to emphasise that the maintenance of the roles of district and local centres, as such, will be an important consideration in assessing applications, and to define more clearly and accurately that it is retail need rather than any other form, which is within the ambit of the policy.	Accepted.	Alteration will bring the policy more up to date.
EM8: Enhancing Town Centres	080/0664 Headstone Residents' Association	144	I recommend no modification to the Plan.	Accepted	No modification required.
EM13: New Technology Industries	026/0463 House Builders Federation	144	I recommend that the Plan be modified by the deletion of Policy EM13 and its supporting text.	Accepted	Deletion will not hinder the development of such businesses in the Borough.

EM14: Business Use - Designated Area: BAE Systems site	0581-0582 063/BAE Systems	149	I recommend that the Plan be modified by the deletion from Policy EM14 of "BAE Systems, Warren Lane, Stanmore". Instead, the land should be made a Proposal Site, for housing, with an indication that Green Belt, amenity and nature conservation considerations might preclude the achievement of a density according with the expected minimum of Policy H5 and PPG3.	Accepted	The Council acknowledges the contribution that this site can make to housing provision overall.
EM17: Change of Use of Shops – Primary Shopping Frontages	016/0751 NHS Executive (North Thames Regional Office) 016/0160R NHS Executive (NTERO)	150	I recommend that the Plan be modified by the deletion of proviso D in Policy EM17.	Accepted	The issue of highway safety will not be compromised by deletion of criterion D).
Text Map 15: Pattern and Distribution of Designated Town Centres	090/1123 Tesco Stores Ltd	150	I recommend no modification to the Plan	Accepted	No modification required
EM18 and EM19: Change of Use of Shops – Secondary Shopping Frontages and Local Centres	026/0464-0465 House Builders Federation	151	I recommend that the Plan be modified by the deletion of proviso E in Policy EM18 and proviso C in Policy EM19.	Accepted	The issue of highway safety will not be compromised by deletion of these criteria.
EM19: Change of Use of Shops-Designated Shopping Frontages of Local Centres	042/0846 The Hatch End Association	152	I recommend no modification to the Plan	Accepted	No modification required
EM20: Change of Use of Shops in Non-Designated Parades	043/0858 Planning for Older People (POP), Age Concern Harrow	152	I recommend that the Plan be modified by the deletion of proviso B in Policy EM20.	Accepted	The issue of highway safety will not be compromised by deletion of this criterion.
EM25: Town Centre Environment	026/0466 House Builders Fed. 062/1048 Government Office for London, Planning Division	153	I recommend no modification to the Plan.	Accepted	No modification required.

CHAPTER 8 – RECREATION, LEISURE AND TOURISM

UDP Policy/ Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
Introduction	082/0672 Pinner South Residents Association	154	I recommend no modification to the Plan.	Accepted	No modification required.
R3: Public Open Space	026/0467 House Builders Federation	154	I recommend no modification to the Plan.	Accepted	No modification required.
R5 and Para 8.28: Outdoor Sports Facilities	125/1352 Old Lyonians Association 057/0199R Mr J Dobson 142/0219R CAPRA	155	I recommend that the Plan be modified by the deletion of Policy R5 and its supporting text	Accepted In part	A suitable cross-reference in the Recreation Chapter to EP46 is needed to reflect the implications of deletion of this policy. There is also a need to state the Council's stance on neglected or underused outdoor sports facilities in the Plan. It is suggested that this should be located in para 2.100 under Policy SR1.
R7: Informal Recreation	026/0468 House Builders Federation	155	I recommend no modification to the Plan.	Accepted	No modification required.
Para 8.39: Outdoor Water-Based Activities	006/0335 Mr P Jeffrey	155	I recommend no modification to the Plan.	Accepted	No modification required.
R9 and Para 8.40: Play Areas	122/1342 Housing consortium 007/0139R Harrow Nature Conservation Forum	156	I recommend no modification to the Plan.	Accepted	No modification required.

R10: Indoor Sports Facilities	026/0469 House Builders Fed. 074/0622 CPRE London	157	I recommend no modification to the Plan.	Accepted	No modification required.
R11 and Para 8.45: Arts, Culture and Entertainment	026/0470 House Builders Fed. 005/0686 Mrs M Stapleton 116/1271 The Pinner Association	157	I recommend no modification to the Plan.	Accepted	No modification required.
R12: Protecting Arts, Culture, Entertainment and Leisure Facilities	135/1444 Sainsbury's Supermarkets Ltd	157	I recommend that the Plan be modified by the deletion of Policy R12 and its supporting text.	Accepted in part	Deletion of the policy would mean that there is no protection in the Plan under any circumstances for such uses. It is suggested that a less restrictive criteria-based policy for protecting facilities in sustainable locations would be more appropriate.
R14 and paras 8.49 and 8.50: Libraries	013/0375 Mr P H Poole 026/0471 House Builders Federation 051/0559 Anne Francis 005/0687 Mrs M Stapleton	158	I recommend that the Plan be modified by the deletion of Policy R14 and its supporting text.	Accepted	Policy R15 is adequate to ensure the provision of new library facilities.
R15: Leisure Facilities	074/0623 CPRE London	158	I recommend no modification to the Plan.	Accepted	No modification required.
Policy R16 and para 8.55: Tourism	116/1272 The Pinner Association	159	I recommend no modification to the Plan.	Accepted	No modification required.
R17 and paras 8.58 and 8.60: Hotels and Guest Houses	044/0959 Greater London Authority	159	I recommend that the Plan be modified by the deletion of the third and fourth sentences in para 8.60, thus omitting the words "Outside town centres.....public transport".	Accepted	The suggested amendments will not affect the basis of the policy or alter its meaning

CHAPTER 9 – COMMUNITY SERVICES AND ACCESSIBILITY

UDP Policy/ Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
General	006/0333 Mr P Jeffrey	160	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	055/0562 The Keepers and Governors of Harrow School	160	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	016/0750 NHS Executive (North Thames Regional Office)	161	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	111/1129 H M Prison Service	161	I recommend no modification to the Plan.	Accepted	No modification required.
C2 (<i>C18 in FDD</i>): Provision of Social and Community Facilities	114/1236 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes	161	I recommend that the Plan be modified by the substitution for Policy C2 of the following: “The Council will encourage the provision of community facilities, particularly in areas identified to be in need of such facilities or facilities required to meet the needs of particular communities.” Consequential amendments of the supporting text should also be made.	Accepted, subject to minor addition	Whilst accepting the need to modify the policy, the Council recognises the need to protect existing facilities in the Borough. The suggested amendment to the policy should be further modified to reflect this.
C6 (<i>C5 in FDD</i>) and supporting paras: First and Middle Schools	002/0313 Revd T. J. Bradshaw 052/0989 C J Wayman 052/0990 C J Wayman	163	I recommend no modification to the Plan.	Accepted	No modification required.

C7 (<i>C6 in FDD</i>): High Schools and Tertiary Colleges	002/0314 Revd T. J. Bradshaw 026/0472 House Builders Federation 032/0785 E D Chambers	164	I recommend that the Plan be modified by the deletion of Policy C7 and its supporting text.	Accepted	Council commitment to Further Education will not be compromised by deletion of this policy.
New Policy	061/1027 Harrow College	164	I recommend no modification to the Plan.	Accepted	No modification required.
C8 (<i>C7 in FDD</i>): Harrow College	002/0315 Revd T. J. Bradshaw 026/0473 House Builders Federation 061/1024 Harrow College 061/1025 Harrow College 078/1103 Mr J Carpenter (Harrow FoE)	165	I recommend that the Plan be modified by the deletion of Policy C8 and its supporting text.	Accepted	The content of the deleted policy is partly covered by the revised wording of PS6.
C9 (<i>C8 in FDD</i>): Dual Use of School Facilities and Playing Fields	002/0316 Revd T. J. Bradshaw	165	I recommend that the Plan be modified by the deletion of Policy C9 and its supporting text.	Accepted	Efficient use of premises and facilities is already covered by other policies.
C10 (<i>C9 in FDD</i>): Extensions to School Premises	002/0317 Revd T. J. Bradshaw 026/0474 House Builders Federation 062/1049 GOL (Planning Division)	166	I recommend that the Plan be modified by the deletion of Policy C10 and its supporting text.	Accepted	.
C11 (<i>C10 in FDD</i>): New Education Facilities	002/0318 Revd T. J. Bradshaw 044/0963 Greater London Authority	167	I recommend that the Plan be modified by the deletion of criterion B of Policy C11.	Accepted	Criteria C and D cover the Council's concerns on highway safety/ parking.
C13 (<i>C12 in FDD</i>): Doctors' Surgeries	016/0755 NHS Executive (North Thames Regional Office)	168	I recommend no modification to the Plan.	Accepted	No modification required.
C18 (<i>C16 in FDD</i>): Public Conveniences	082/0670 Pinner South Residents Association 032/0778 E D Chambers	168	I recommend no modification to the Plan.	Accepted	No modification required.

C20 (<i>C19 in FDD</i>): Access to Buildings and Public Spaces	002/0319 Revd T. J. Bradshaw 026/0475 House Builders Federation 042/0851 The Hatch End Association 114/1237 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 044/0175R Greater London Authority	169	I recommend that the Plan be modified by the deletion of Policy C20 and its supporting text.	Not accepted	The Inspector cites in his Assessment advice to include a Part 1 policy on inclusive access, supported by a series of Part 2 policies. It is considered that this is the most appropriate way to proceed, particularly in view of the London Plan. Appropriately- worded policies taking on board the Inspector's comments should thus be prepared.
C21 (<i>C20 in FDD</i>): Access to Leisure, Recreation, Community and Retail Facilities	002/0320 Revd T. J. Bradshaw	170	I recommend no modification to the Plan.	Accepted	No modification required.
C15 (<i>C22 in FDD</i>): Ethnic Communities	002/0321 Revd T. J. Bradshaw 026/0476 House Builders Federation 078/1091 Mr J Carpenter (Harrow FoE) 114/1238 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes	171	I recommend that the Plan be modified by the deletion of Policy C15 and its supporting text.	Accepted	

CHAPTER 10 – IMPLEMENTATION, RESOURCES AND MONITORING

UDP Policy/ Para.	Objector Reference No. & Name	Inspector's Report Reference (Page No)	Inspector's Recommendation	LBH Response	Reason for Response
General	015/0738 Defence Estates, South East and Germany	172	I recommend no modification to the Plan.	Accepted	No modification required.
General	078/1092 Mr J Carpenter (Harrow FoE)	172	I recommend no modification to the Plan.	Accepted	No modification required.
Text Omission	071/0608 H Jeffrey Lever	173	I recommend no modification to the Plan.	Accepted	No modification required.
New Policy	078/1094 Mr J Carpenter (Harrow FoE)	173	I recommend no modification to the Plan.	Accepted	No modification required.
Para 10.11 and 13: Planning Obligations and Legal Agreements	082/0669 Pinner South Residents Association 016/0757 NHS Executive (North Thames Regional Office) 114/1239 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes	174	I recommend no modification to the Plan.	Accepted	No modification required.
I4: Planning Obligations – Residential Development and School Accommodation.	026/0477 House Builders Federation 065/0595 Peter D Kyte Associates 114/1240 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 122/1343 Housing consortium:	175	I recommend that the Plan be modified by the deletion of Policy I4 and its supporting text.	Accepted	Planning obligations for school development and accommodation can still be sought under Policy I3.

15 and Para 10.19: Enforcement	065/0596 Peter D Kyte Associates 032/0779 E D Chambers 142/0221R CAPRA	176	I recommend no modification to the Plan.	Accepted	No modification required.
17 : Public Consultation	032/0787 E D Chambers 062/1050 Government Office for London, Planning Division	176	I recommend no modification to the Plan.	Accepted	No modification required.

CHAPTER 11 – PROPOSAL SITES

UDP Policy/ Para.	Objector Reference No. & Name	Inspector's Report Reference	Inspector's Recommendation	LBH Response	Reason for Response
General	024/0433 Bill Stephenson	177	I recommend no modification to the Plan.	Accepted	No modification required.
Text Omission	122/1345 Housing consortium	177	I recommend no modification to the Plan.	Accepted	No modification required.
General	125/1354 Old Lyonians Association	178	I recommend no modification to the Plan.	Accepted	No modification required.
PS 5: Gayton Road car park, lending library and Sonia Court	061/1029 Harrow College	179	I recommend no modification to the Plan.	Accepted	No modification required.
PS 6: Harrow-on-the-Hill Station, and adjoining land (and PIC34, PIC36 & PIC37)	061/1030 Harrow College 113/1132-33 Royal Mail Group plc 051/0176R Anne Francis 061/0202R Harrow College 113/0208R-0209R Royal Mail Group plc 051/0278R Anne Francis 213/3003P Kenneth W Reed & Associates 010/3004P English Heritage (London Region) 214/3005P S & M Properties Ltd 216/3007P Mr E Atherton 217/3008P Mr P Zatz 218/3009P Mr D Gray 219/3010P Chief Advisor to the Mayor on Architecture & Urbanism 220/3011P Roxborough Residents' Association 077/3012P Roxborough Road Residents Association 221/3013P Lang Homes N. London	184	I make no recommendation.	Amend policy in line with PICs, plus additional comment on Harrow Baptist Church	Changes to the Development Objectives and Constraints for PS6, agreed at the Inquiry on 15 th April 2003, reflect the Council position with the site. In the absence of a recommendation from the Inspector, although there is no compelling reason to change this position, it would be helpful to reflect the Inspector's comments with regard to Harrow Baptist Church by way of some additional wording.

PS 6:Harrow-on-the-Hill Station, and adjoining land (and PIC34, PIC36 & PIC37) (Continued)	2222/3014P Greenhill & Marlborough Labour Party 061/3015P Harrow College 113/3016P Royal Mail Group plc 223/3017P Ms C Harrison-Reed 224/3018P Harrow Baptist Church 140/3019P Member of Parliament for Harrow West 225/3020P Leaseholders of properties in Station Road 226/3021P Nancy Yates 228/3023P Harrow on the Hill Forum 229/3024P Ian McAleese 051/3025P Anne Francis 230/3026P Sproul & Co	184	I make no recommendation.
PS 7: Land north of Junction Road	0777/0659 Roxborough Road Residents Association	184	I recommend that the Plan be modified by the deletion of the last sentence of the text, in the column - "Development Objectives and Constraints", relating to Proposal Site 7.
PS15: Roch Avenue Allotments, Tenby Road, Edgware (and PIC31).	012/0351 Roch Avenue Allotments Action Group 032/0783 E D Chambers 012/0158R Roch Avenue Allotments Action Group	186	I recommend that the Plan be modified by the deletion of PS15 as a Proposal Site.

PS 17: Former Harrow Hospital, and nurses hostel, Roxeth Hill	117/1275 Bellway Homes Ltd	187	I recommend that the Plan be modified, in relation to the text for Proposal Site 17, in the column - "Development Objectives and Constraints", by the deletion of "or similar community uses", and the addition of a sentence at the end of the paragraph so amended as follows:- "The aim should be for an imaginative scheme achieving high density provision whilst suitably recognising the design implications of all these factors"	Accepted	The recommended change provides greater consistency with PPG3 and the Development Brief endorsed by the Council. The suggested reference to "design implications", however, could fail to properly address the impact of development on the character of the Conservation Area. The inclusion, in addition, of "...prevailing constraints..." would overcome this omission, and more accurately reflect the Inspector's assessment.
PS 18: Former Kings Head Hotel, High Street, Harrow on the Hill	059/0580 Fairbriar/Macleod 044/0971 Greater London Authority	188	I recommend that the Plan be modified, in relation to the text for Proposal Site 18, in the column - "Development Objectives and Constraints", as follows:- Add at the end of the first para - "Regard will also be paid to Government advice published since the approval of the brief in PPG 3 and PPG 13." Replace text in second para after first sentence with - "Should the development of an hotel not be viable, then the Council will consider as an alternative a scheme based on the following principles:	Accepted	The recommended change reflects the current planning position and provides a more precise basis for the consideration of future development proposals. Amending the second paragraph as suggested, however, would create a potential conflict with the development guidelines referred to in para. 1 of the Development Objectives and Constraints column. These serve no useful purpose having been superseded by the recent appeal decision to allow

	<p>addressed).</p> <p>b) The demolition of the Assembly Rooms as part of a comprehensive scheme.</p> <p>c) The provision of purpose built new housing on the site consistent with the need to ensure the character of the Conservation Area and historic interest of the listed building is preserved; the relationship with adjacent properties is not materially harmed; adequate areas are set aside for amenity purposes and account is taken of existing trees covered by TPO's.”</p> <p>(Third para to be retained).</p>		residential development of the site, and can now be deleted from the plan.
PS21: Harrow Arts Centre, Uxbridge Road, and associated land and buildings.	013/0374 Mr P H Poole	189	I recommend no modification to the Plan.
PS 23 - Rayners Lane and PS 27A - Roxeth Nursery, The Arches	110/1127-28 Warden Housing Association Ltd 129/1379-80 David Fentiman 007/0268R Harrow Nature Conservation Forum	189	I recommend that the Plan be modified by the removal from the Proposal Map of the open space designations for land at Drinkwater Road/Swifts Close and at Thackeray Close.
PS 29: Land at Stanmore Station and adjacent land, London Road	031/0495 Ramblers London Walking Forum 044/0972 Greater London Authority	190	I recommend that the Plan be modified, in relation to the text for Proposal Site 29, in the column - “Development Objectives and Constraints”, by the substitution for the final sentence of the following:- “A footpath should be provided through the site between its frontages to London Road and Dalkeith Grove, as part of a link to Canons Park and Stanmore Country Park”.

PS 30: Former RAF Stanmore Park, Uxbridge Road	007/0723 Harrow Nature Conservation Forum	191	I recommend no modification to the Plan.	Accepted	No modification required.
PS 31: Government Offices, Brockley Hill	007/0724 Harrow Nature Conservation Forum	191	I recommend no modification to the Plan.	Accepted	No modification required.
PS33: Former Government Offices, Honeypot Lane.	018/0420 Laurence Cox	192	I recommend no modification to the Plan.	Accepted	No modification required.
PS 41: Ex BR Site, Cecil Road	044/0973 Greater London Authority	192	I recommend no modification to the Plan.	Accepted	No modification required.

CHAPTER 12 – SCHEDULES

UDP Policy/Para.	Objector Reference No. & Name	Inspector's Report Reference	Inspector's Recommendation	LBH Response	Reason for Response
Schedule 1 – Glossary of Terms (and PIC35)	026/0478 House Builders Federation 065/0597 Peter D Kyte Associates 052/0991-2 C J Wayman	193	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 35, and by the deletion from the Glossary of the definition of affordable housing.	Accepted	The inclusion of a definition of affordable housing within the reasoned justification of a re-drafted policy obviates the need for inclusion in the Glossary.
Schedule 7 – Service Road Proposals	013/0377 Mr P H Poole 042/0855 The Hatch End Association	194	I recommend no modification to the Plan.	Accepted	No modification required.
Schedule 9 – Method for Applying Changes of Use of Shops Policy	021/0426 J E Cripps	194	I recommend no modification to the Plan.	Accepted	No modification required.
Schedule 11 – Key Document References	052/0177R C J Wayman	195	I recommend no modification to the Plan.	Accepted	No modification required.

CHAPTER 13 – PROPOSALS MAP

UDP Policy/Para.	Objector Reference No. & Name	Inspector's Report Reference	Inspector's Recommendation	LBH Response	Reason for Response
Borough Distributor Road: Old Church Lane, Abercorn Road, St Andrew's Drive and Culver Grove.	018/0419 Laurence Cox 020/0424 Russell Kane 033/0521 S E Spells 034/0525 H J Spells 046/0539 Pamela Lea 047/0543 Deborah Mallett 048/0547 Miss D H Holburn 049/0551 S Pack 070/0606 B Moorhouse 052/0986 C J Wayman 092/1139 Ros Shaw 093/1143 Mrs Rambai Kami 094/1147 Barry Gilbert 095/1151 Mr J Rawal 096/1155 Christine Allain 097/1159 Mr & Mrs Menahem 098/1163 Mrs P Rosenberg 099/1167 J Fernandes 100/1171 Z Waddood 101/1175 Guys Newsagents 102/1179 Mr T Selvarajah 103/1183 Mr, Mrs & Mstr Marcampillai 104/1187 M C Clapinson 105/1191 P Pindoria 106/1195 D V Patel 107/1199 P Simmonds 108/1203 John and Kathleen Murphy 109/1207 A Barretto 126/1367 David Leboff	196	I recommend no modification to the Plan.	Accepted	No modification required.

Borough Distributor Road: Old Church Lane, Abercorn Road, St Andrew's Drive and Culver Grove. (Cont)	128/1377 E Coppin 131/1386 V & K Hirani 137/1451 Mansukh Vekaria 060/1470 Mrs Assani	196	I recommend no modification to the Plan.	Accepted	No modification required.
London Outer Orbital Path and the Capital Ring	031/0494 Ramblers London Walking Forum	197	I recommend no modification to the Plan.	Accepted	No modification required.
Met.. Open Land: Lowlands Recreation Ground	061/1031 Harrow College	198	I recommend no modification to the Plan.	Accepted	No modification required.
Major Developed Sites in the Green Belt	062/1058 Government Office for London, Planning Division	198	I recommend no modification to the Plan.	Accepted	No modification required.
Open Space: Heathfield School (and PIC32)	058/0579 Girls Day School Trust 058/0200R Girls Day School Trust*	199	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 32.	Accepted	No further modification required.
Sites of Nature Conservation Importance	057/0563 Mr J Dobson	199	I recommend that the Plan be modified in accordance with the Council's response to the objection, as indicated above.	Accepted	Identified errors and omissions will be addressed.
Site of Nature Conservation Importance: Weald Wood	022/0429 Mr J Cobb	199	I recommend no modification to the Plan.	Accepted	No modification required.

Site of Nature Conservation Importance: Wood Farm (and PIC33)	018/0161R Laurence Cox 007/0272R Harrow Nature Conservation Forum 057/0279R Mr J Dobson 141/0282R Mr Simon Braiman 144/0283R J Roberts	200	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 33, to include land at Wood Farm, proposed for omission by the RDD, within the Site of Nature Conservation Importance, and also the frontage land shown edged red on Plan LBH/7/3-2.	Accepted in part	It is suggested that the frontage land should be excluded (reflecting its low nature conservation value, as concluded from a GLA survey of the site in February 2003).
Site of Nature Conservation Importance: Limes House	007/0273R Harrow Nature Conservation Forum	201	I recommend that the Plan be modified by the inclusion of land at Limes House in the adjoining Site of Nature Conservation Importance.	Not accepted	The LEU Handbook, "Nature Conservation in Harrow" clearly excludes land at Limes House from the adjoining Site of Nature Conservation Interest. In the absence of any contrary advice from the LEU's successor body at the GLA, there is no justification in accepting the recommended change.
Pinner District Centre	116/1274 The Pinner Association	201	I make no recommendation.	Proposals Map to be re-examined	The Council has agreed to review the clarity of the Proposals Map as it affects Pinner District Centre.
Floodplains	114/1215 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes	202	I recommend that the Plan be modified by the substitution, on the Proposals Map, of the notation " Environment Agency Indicative Flood Plains " for "Flood Plains [of Main Rivers]".	Accepted	This technical change clarifies what information is being shown.
Future Developments for Telecommunications	123/1290 Crown Castle UK Ltd	202	I recommend no modification to the Plan.	Accepted	No modification required.

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