



UNITARY DEVELOPMENT PLAN ADVISORY PANEL

MONDAY 5 JANUARY 2004
7.30 PM

PANEL AGENDA (ADVISORY)

COMMITTEE ROOMS 1 & 2,
HARROW CIVIC CENTRE

MEMBERSHIP (Quorum 3)

Chair: Councillor Burchell

Councillors:

Idaikkadar
N Shah
Anne Whitehead

Marilyn Ashton
Mrs Bath
Mrs Kinnear

Reserve Members:

1. Blann
2. Bluston
3. Ray
4. Miles

1. Kara
2. Versallion
3. Harriss

Issued by the Committee Services Section,
Law and Administration Division

Contact: Rebecca Arnold, Committee Administrator
Tel: 020 8424 1269 E-mail: rebecca.arnold@harrow.gov.uk

**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

MONDAY 5 JANUARY 2004

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 - 4)
That the minutes of the Special meeting held on 12 November 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).
- Enc. 8. **Replacement Harrow Unitary Development Plan - Major Revisions to Policies and Reasoned Justifications to be included in Proposed Modifications:** (Pages 5 - 50)
Report of the Chief Planning Officer.
- Enc. 9. **Replacement Harrow Unitary Development Plan - Draft Proposed Modifications:** (Pages 51 - 94)
Report of the Chief Planning Officer.
- Enc. 10. **Replacement Harrow Unitary Development Plan - Statement of Decisions on the Inspector's Report on the Public Local Inquiry:** (Pages 95 - 148)

Report of the Chief Planning Officer.

- Enc. 11. **Annual Monitoring Report:** (Pages 149 - 176)
Report of the Chief Planning Officer.

AGENDA - PART II (PRESS AND PUBLIC EXCLUDED-NIL

This page is intentionally left blank

CABINET

UNITARY DEVELOPMENT PLAN ADVISORY
PANEL SPECIAL

12 NOVEMBER 2003

Chair: * Councillor Burchell

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

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

58. **Attendance by Reserve Members:**

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

<u>Ordinary Member</u>	<u>Reserve Member</u>
Councillor Mrs Kinnear	Councillor Kara

59. **Declarations of Interest:**

RESOLVED: To note that there were no declarations of interests made by Members in relation to the business to be transacted at this meeting.

60. **Arrangement of Agenda:**

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

61. **Minutes:**

RESOLVED: That the minutes of the meeting held on 16 September 2003, having been circulated, be taken as read and signed as a correct record.

62. **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).

63. **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).

64. **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).

65. **References from Council and Other Committees/Panels:**

RESOLVED: To note that there were no references to be received from Council or other Committees/Panels.

66. **Harrow Unitary Development Plan - Consideration of the Inspector's Report on the Public Local Inquiry:**

The Panel received a report of the Chief Planning Officer which considered the recommendations of the Inspector on the Public Local Inquiry relating to the replacement Harrow Unitary Development Plan (HUDP). The report accordingly suggested a response to each of the Inspector's recommendations and a reason for each response. Those recommendations listed at paragraph 6 of the report and marked with an asterisk, it was advised, had been identified as requiring more detailed consideration and officers therefore proposed that they should be the subject of further reports to the Panel in due course.

It was noted that officers were recommending that the overwhelming majority of the

Inspector's recommendations be accepted and that only a small number not be accepted, either in full or in part.

The Panel were invited to consider and discuss the officer comments so far. When the Panel had agreed a complete response this would be the subject of a recommendation to Cabinet and, subject to their input, a statement of decisions would then be published, alongside the proposed modifications to the Plan that would consequently be required, and would be placed on deposit.

Officers further explained that the HUDP needed to be in general conformity with the London Plan, but due to the slippage of the programme for adopting the London Plan, it was proving difficult to progress this. Officers had scheduled a meeting with Greater London Authority officers to discuss the issue further.

During the discussion which followed, Members raised a number of general questions regarding the process of amending the HUDP, including, inter alia, what weight the Inspector's report should be accorded by Members when determining planning applications between now and the adoption of the Replacement HUDP. In response, officers advised that the report would clearly constitute a material consideration in this interim period.

The Panel then turned to discussion of the proposed responses to the Inspector's recommendations. The majority of the responses proposed by officers were approved by the general assent of the Panel, but, at the request of a Member, individual votes were taken on the responses proposed in relation to the following policies on which there was not unanimous support. Following the votes, the officer response to each was agreed as set out in the appendix to the officer report:

- Policy D5 and paragraphs 4.33 and 4.37: New Residential Development – Amenity Space and Privacy; Policy D10: Rear Garden Interface
[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Policies D13 and D14: Locally Listed Buildings
[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Transport Objectives – paragraph 5.12
[Notes: (1) Councillors Burchell, Idaikkadar, N Shah and Anne Whitehead wished to be recorded as having voted in favour of the officer response;
(2) Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Policy H5: Residential Density
A Member expressed concern at the Inspector's recommendation that the maximum standard in relation to this policy be deleted. In response it was explained that this was in line with Government policy and that it was considered that the density of development could be more effectively controlled through design factors rather than the relatively crude tool of a maximum density standard.
[Notes: (1) Councillors Burchell, Idaikkadar, N Shah and Anne Whitehead wished to be recorded as having voted in favour of the officer response;
(2) Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Policy H10 and paragraph 6.57: Conversions of Houses and Other Buildings to Flats
[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Policy H13: Houses in Multiple Occupation
[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Policy H16: Hostels
[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Policy EM14: Business Use – Designated Area: BAE Systems site
[Notes: (1) Councillors Burchell, Idaikkadar, N Shah and Anne Whitehead wished

to be recorded as having voted in favour of the officer response;

(2) Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].

- Policy EM17: Change of Use of Shops – Primary Shopping Frontages
[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Policies EM 18 and EM19: Change of Use of Shops – Secondary Shopping Frontages and Local Centres
[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Policy C11: New Education Facilities
[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- PS 17: Former Harrow Hospital, and nurses hostel, Roxeth Hill
A Member explained that whilst she did not disagree with the Inspector's recommendation in its entirety, she objected to the inclusion of the words 'high density' in the amendment.

[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].
- Site of Nature Conservation Importance: Wood Farm (and PIC33)
[Note: Councillors Marilyn Ashton, Mrs Bath and Kara wished to be recorded as having voted against the approval of the officer response].

The following issues, inter alia, were also raised and discussed:

- Policies T17, T18 and H4
Some concern was expressed at the Inspector's recommendation that policies T17, T18 and H4 be deleted, however officers explained that the Inspector proposed the deletion of these on the basis that they were unnecessary and reassured the Panel that the aim of each was still covered by other policies in the Plan.
- Policy R14 and paragraphs 8.49 and 8.50: Libraries
Some disagreement was expressed at the Inspector's recommendation that policy R14 be deleted. Officers explained that as the policy constituted a statement of intent it was not suitable for inclusion in the HUDP, but would probably be suitable for inclusion in the local development framework which the Authority would be required to develop.
- Policy T15: Making Better Use of Parking Provision
It was noted that the Inspector proposed the deletion of policy T15. Several Members expressed concern at this and, following discussion, it was agreed that, as T15 was closely related to policies T13 and T14, which were to be combined and re-drafted and the subject of a further report to the Panel, the response to T15 would be further considered at this stage.
- Policy SD1: Quality of Design
It was noted that officers were recommending that the Inspector's recommendation in respect of this policy be not accepted in full and proposed an alternative form of amended wording. It was agreed that the wording be given further consideration and the subject of a further report to the Panel.

RESOLVED: That (1) the officer response to policy SD1 be the subject of a further report to be submitted to the Panel;

(2) the Panel reserve its approval of the officer response to policy T15 pending the submission of a further report regarding policies T13 and T14 to a future meeting of the Panel; and

(3) it be agreed to recommend to the Cabinet the responses to the recommendations contained in the Inspector's report now approved at this Panel meeting, excepting those items which it has been agreed above and in the officer report are to be the subject of a further report to the Panel (see note below).

[Note: The Council's Statement of Decisions on the recommendations contained in the Inspector's report will be the subject of a composite recommendation to Cabinet

in due course when the Panel have responded to the remainder of the recommendations and considered all the modifications to the Plan resulting from consideration of the Inspector's recommendations].

67. **Any Other Business:**

- Cancellation of the Special Meeting scheduled to take place on 18 November 2003
It was noted the Panel had also made provision for a further Special Meeting to be held on 18 November in case further discussion of the recommendations of the Inspector was required. It was now agreed that this meeting would be cancelled as it was no longer required.

RESOLVED: That the Special Meeting of the Panel scheduled for 18 November 2003 be cancelled.

- The reform of the development plan system
Further to the previous discussions regarding the reform of the development plan system, the Chair requested that officers circulate to Members of the Panel publications which had recently been received regarding the reforms. He also requested that officers organise a training session for Members regarding the changes.

RESOLVED: That the documents referred to above be circulated to all Members of the Panel and officers organise training for Members regarding the reform of the development plan system.

(Note: The meeting having commenced at 7.30 pm, closed at 8.59 pm)

(Signed) COUNCILLOR KEITH BURCHELL
Chair

LONDON BOROUGH OF HARROW

Meeting:	Unitary Development Plan Panel
Date:	5 th January 2004
Subject:	Replacement Harrow Unitary Development Plan – Major Revisions to Policies and Reasoned Justifications to be included in Proposed Modifications.
Key decision	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder	Portfolio Holder for Planning, Development, Housing and Best Value
Status:	Public
Ward:	All
Enclosures:	None

1. Summary

The Panel considered the suggested Council response to the Inspector's recommendations in a report to its last meeting on 12th November 2003. The latter highlighted certain issues which were to be the subject of a future report. This report sets out the revised wording and reasoned justifications on these policies and proposals. In addition, revised policies and wording are also included on other matters where the Council accepted the Inspector's recommendations, but also involved re-drafting of policies and/or reasoned justifications, and other wording. Following consideration of the wording by the Panel and approval by Cabinet, these policies will be included in the Proposed Modifications to be placed on deposit alongside the Statement of Decisions. Another report including a schedule of draft Proposed Modifications on all other matters, together with an updated Statement of Decisions is included elsewhere on the agenda.

2. Recommendations (for decision by the Cabinet.)

2.1 To agree the revised wording of Policies and Reasoned Justifications set out in this report, and for these to be brought forward as Proposed Modifications to the Plan.

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

3. Consultation with Ward Councillors

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

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

- 4.1 In addition to publishing a statement of decisions on the recommendations in the Inspector's report, the Council is required to prepare Proposed Modifications to the Plan and place them on deposit alongside the Statement of Decisions. The Council will then proceed to complete the remaining statutory stages in order to secure the plan's adoption as soon as possible.

5. **Relevance to Corporate Priorities**

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

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

The following issues are covered in this report:-

- 1) SH1:Housing Provision and Housing Need, and Additional Housing Provision in next 10 years
- 2) SH2: Housing Types and Mix
- 3) EP46 and Para 3.139: Open Space
- 4) T13 & Schedule 13: Parking Standards & T14 & Para 5.32: New Development and On-Street Parking
- 5) H5: Residential Density
- 6) H6: Affordable Housing and H7: Housing for Key Workers, and Affordable Housing Target.
- 7) H10: Conversion of Houses and Other Buildings to Flats and Schedule 8.
- 8) H19: Mobility and Lifetime Homes
- 9) R5 & Para 8.28: Outdoor Sports Facilities
- 10) R12: Protecting Arts, Culture, Entertainment and Leisure Facilities
- 11) C2: Provision of Social and Community Facilities
- 12) C20: Access to Buildings and Public Spaces
- 13) Proposal Site 6: Harrow on the Hill Station and Land in College Road and Lowlands Road
- 14) New Proposal Site - BAE Systems, Warren Lane, Stanmore.

Note: All policy and reasoned justification wording highlighted below constitutes revisions to that included in the revised deposit draft Replacement HUDP (March 2002) and, subject to the decisions made by the Panel, will be added to the draft Proposed Modifications schedule being considered in another agenda item. Strikethrough of wording denotes deletion where amendments to the existing text is proposed.

1) **POLICY SH1 – HOUSING PROVISION AND HOUSING NEED**

The Inquiry Inspector recommended - (i) that the Council make changes in the supporting text to Part 1 Policy SH1 to include

reference to the aim to exceed the relevant housing capacity estimate, inter alia, and a reference to Table 13 in the 1999 Housing Capacity Study, and its implications for additional development, and (ii) that the Council formulate a new policy on the Council's overall approach to housing provision over ten years from the Plan forecast adoption date, together with its reasoned justification text. This reports sets out the approach to, and wording of, the suggested changes to the text of Policy SH1, and the new policy.

In order to clarify the Council's intentions with regard to the prospective occupants of future housing and the approach to maximising provision, it is suggested that the reasoned justification (paragraph 2.81) be amended to reflect the Inspector's assessment and recommendation (see below).

Whilst the changes recommended by the Inspector to the wording of the policy are all accepted, the circumstances surrounding the figure of potential provision to be included in criterion B) have changed significantly since the draft replacement Plan was first prepared. The Inspector has alluded to these in his assessment. The draft London Plan contained a figure of 6,620 net additional homes for Harrow for the period 1997-2016. This was a minimum figure, and Boroughs are also expected to include policies that exceed this figure. This figure equates to a minimum annual provision of 330 units.

The figure of 6,620 was included in the draft London Plan as Harrow's contribution to a London total of 457,950. This equated to an annual figure of 23,000 for London as a whole, including a contribution of at least 330 from Harrow. The need for this total London Plan figure had been pre-determined by Regional Planning Guidance for the South East (RPG9) issued in 2001. Although Harrow had raised objection to the inclusion of this figure in the London Plan (as opposed to the 5,182 in the draft replacement HUDP), following discussion of the total London figure at the examination in public (EIP), the Panel report recommended that the London figure should be further increased, to 30,000. This will clearly have implications for individual Borough targets to be included in UDPs proceeding towards adoption, and draft LDFs when they come forward.

Recent informal discussions with GLA and Government Office for London (GOL) officers strongly indicate that both bodies would be likely to object to the Proposed Modifications if, following the receipt of the EIP Panel report, the figure was now not increased to at least 6,620 units. In practice, it is likely that the Mayor and GOL would have objected to the figure of 5,182 included in SH1 B) if there had been any amendment to that figure in the Revised Deposit Draft. Legally, however, they had no means of recommending the figure be increased. Clearly, in order for the UDP to be in general conformity even with the draft London Plan, the figure should be increased to

6,620 units. This figure is virtually the same as that included in Table 13 of the Housing Capacity Study (6,610), referred to by the Inspector.

An assessment of housing completion levels and planning approvals indicate that the higher figure may be achievable (see Appendix A at end of the Section 1)). Furthermore, a new 2004 London Housing Capacity Study is due to be undertaken in the summer. Clearly, any figure included in the replacement HUDP will be subject to early re-scrutiny once this survey has been undertaken.

Under these circumstances, and in the knowledge that an early review of the figure will be informed by the results of the 2004 Housing Capacity Study, it is therefore recommended that the figure of 6,620 now be included in Policy SH1 B). As a result of the revised figure in SH1B), revised additional wording after the 3rd sentence in para. 2.83 is suggested. Whilst the Inspector recommended that a new Part 2 policy be formulated to indicate the housing provision in the 10 years from the adoption date of the Plan, the Council considers that the Council's intentions would more clearly be identified by setting out all of these matters in a revised Policy SH1. Having accepted the other changes to the wording of Policy SH1 recommended by the Inspector, the policy and reasoned justification now reads:-

Housing Provision and Housing Need

SH1 THE COUNCIL WILL SECURE THE PROVISION OF ADDITIONAL HOUSING, INCLUDING AFFORDABLE HOUSING, TO MEET THE NEEDS OF ~~THE BOROUGH'S RESIDENTS~~ PROSPECTIVE OCCUPANTS THROUGH NEW DEVELOPMENT AND BY MAINTAINING THE EXISTING STOCK. THE COUNCIL IN DECIDING APPLICATIONS FOR NEW HOUSING DEVELOPMENTS WILL TAKE INTO ACCOUNT:-

- A) THE OVERALL HOUSING NEEDS OF LONDON;**
- B) THE POTENTIAL FOR THE PROVISION OF 6620 ADDITIONAL HOUSING UNITS IN THE PERIOD 1ST JANUARY 1997 TO 31ST DECEMBER 2016 AS INDICATED IN THE 1999 HOUSING CAPACITY STUDY;**
- C) THE NEED FOR EFFECTIVE USE OF PREVIOUSLY-DEVELOPED LAND AND EMPTY HOMES PROPERTY;**
- D) THE NEED FOR THE PROPOSAL TO MEET OTHER SUSTAINABILITY OBJECTIVES, INCLUDING ACCESS BY NON-CAR MODES TO LOCAL FACILITIES AND EMPLOYMENT;**
- E) THE NEED FOR THE PROVISION OF APPROPRIATE LEVELS OF AFFORDABLE HOUSING INCLUDING KEY**

WORKER ACCOMMODATION AND SHARED OWNERSHIP ACCOMMODATION;

- F) THE NEED TO PROTECT AND SAFEGUARD THE CHARACTER AND AMENITY OF SURROUNDING RESIDENTIAL AREAS; AND**
- G) THE DESIRABILITY OF REDUCING THE COST OF THE OPERATION OF DWELLINGS THROUGH ENERGY EFFICIENCY MEASURES.**

THE COUNCIL WILL AIM, THROUGH A VARIETY OF DIFFERENT SOURCES, TO SECURE AN ANNUAL AVERAGE OF AT LEAST 330 ADDITIONAL HOUSING UNITS IN THE 10 YEAR PERIOD FROM THE DATE OF ADOPTION OF THE PLAN.

2.81 ~~Whilst the Council's overriding responsibilities are to secure appropriate housing to meet the needs of Borough residents, due regard will need to be paid to the housing situation in London as a whole. For example, opportunities will exist for joint working with adjoining authorities to address problems in each authority.~~ Additional housing provision is required to meet a wide range of housing need and demand. There is continuing population increase and growth in the numbers of households requiring housing in both London as a whole, and Harrow in particular. Because of its attractiveness, the Borough is faced with on-going housing demand from people outside the Borough, as well as housing needs and demand from Borough residents. The Council recognises that the Borough's economic welfare and maintenance of quality public services is dependent on sufficient housing being available for key workers, whilst continued provision of affordable housing will help secure sustainable communities in the Borough. Such housing will include social rented and shared ownership accommodation.

2.82 PPG3 requires Local Planning Authorities to derive a housing provision figure from a capacity based study. The 1999 LPAC Housing Capacity Study fulfils this requirement. The results are reflected in the Policy (Criterion B). However, the Mayor's London Plan will set out the distribution of provision between Boroughs. Therefore the level of provision indicated in the Policy will be kept under review. It is anticipated that all new housing provision in the foreseeable future will be built on previously-developed land.

2.83 New housing in the Borough will be secured from a variety of sources, as reflected in the Housing Capacity Study. Increasingly development has not only involved recycled urban land, but also recycled urban buildings such as vacant units over shops,

disused offices and residential conversions, and this will continue to be encouraged in appropriate circumstances. In order to protect greenfield sites and open space in the Borough, new building will be concentrated on previously-developed sites, and maximised by securing the most efficient and effective use of this. Reflecting the approach to maximising additional housing provision set down in RPG3, RPG9 and the draft London Plan, the Council will aim to exceed the total capacity estimate of 6,620 additional units in the period 1st January 1997 – 31st December 2016 (Table 13 – 1999 Housing Capacity Study). Monitoring of development activity will indicate whether a revised figure in excess of 6,620 units is achievable. The results of the 2004 Housing Capacity Study will inform an early revision of the figure and indicate whether the figure included in the London Plan is appropriate. Maximising housing provision on sites being brought forward for development will go some way to alleviating a continued unsatisfied demand in all sectors, whilst also achieving full and effective use of land. This reflects the emphasis placed by PPG3 on the importance of the sequential test for new housing and favouring the re-use of previously-developed land and buildings. Reduced parking or car free developments can in some cases help to increase density. This approach will be pursued in areas which are well served by public transport.

- 2.84 The Council acknowledges that the provision of additional housing should be assessed against the possible requirements for additional school facilities, higher educational establishments, medical facilities of all types, recreational and leisure facilities and shopping facilities. A balance between housing and other complementary land uses needs to be achieved in order to move towards a more sustainable land use pattern. The Council accepts that the ability of the Borough to achieve the figures set out in the Capacity Study may be influenced by the fact that some sites identified for housing purposes may also be suitable for other important land uses, such as community facilities, institutional facilities and other land uses.
- 2.85 Whilst a positive approach to housing is being emphasised, the Government has asked Boroughs to balance the need for housing with the objective of protecting the environment and safeguarding amenity. The Council therefore take the view that new housing proposals, including extensions, should take account of economic, environmental and social factors. This would ensure the provision of homes which is consistent with the principles of sustainable development. Since the majority of property is in a satisfactory or good physical condition it is in keeping with these principles to ensure that the stock is maintained in this state. Therefore the Council considers it appropriate that, where the quality of the residential stock is generally good, there should be a presumption in favour of its protection.

2.85a The need for energy conservation, waste minimisation and sustainability has become an important consideration in residential development. The Council is not only keen to increase housing developments but to ensure that the standard of design, quality and types of housing assist in achieving the overall objective of promoting sustainable communities. In pursuance of this objective the Council will encourage development which optimises building design, renewable energy, natural lighting and the orientation of buildings. The energy efficiency and overall environmental performance of developments can be optimised utilising building design, layout and orientation, to minimise energy use, and by incorporating other features, such as renewable energy technologies and natural lighting and ventilation. The Council wishes to encourage such development.

New Para The draft London Plan requirement for Harrow to provide a minimum of 6,620 additional dwellings in the twenty-year period 1997-2016, equates to an annual average of at least 330 dwellings. The 1999 Housing Capacity Study identified a range of potential sources of housing provision, and a number of policies promoting suitable provision from these sources have been included in the Plan. The Council considers that the annual average of at least 330 additional housing units can be secured in the 10 year period from the date of adoption of the Plan. On-going monitoring of housing provision under the 'plan, monitor and manage' approach has informed, and will continue to inform, the Council of the ways in which it is maximising housing provision through a variety of sources. Such monitoring also assists the Council to identify those sources which might help exceed the annual average figure. The range of policies in the Plan meets the requirements of RPG3 and PPG3. With regard to existing housing, there are also policies to resist the loss of residential land and buildings, to ensure that there is effective use and maintenance of property there are policies on empty homes and maintenance and improvement, whilst more effective use of land and buildings is to be secured through encouraging higher residential densities in appropriate locations.

New para In addition to the sources outlined above, proposal sites including residential development have been identified on the Proposals Map. The Council is also very mindful of the Government's increased emphasis on the requirement for local planning authorities to have an up-to-date review of employment land (consultation paper on proposed change to PPG3 – July 2003). The Council considers that it generally meets this requirement as such an exercise was undertaken in formulating the policies in the Plan.

APPENDIX A

Comparing the 1999 Housing Capacity Study Potential and Performance.

1. The 1999 Housing Capacity Study (Table 13) identified the following information for Harrow by five-year periods:-

TOTAL CAPACITY (CONVENTIONAL AND NON-CONVENTIONAL)	
1997-2001	- 2,138
2002-2006	- 2,070
2007-2011	- 1,257
<u>2012-2016</u>	- <u>1,145</u>
Total	- 6,610 (net gain)

(The study identified 'Conventional' and 'Non-Conventional' Capacity as comprising:-

'Conventional' – Includes self-contained accommodation such as Large identified sites, Large Windfall sites, Large Identified Office Sites, Large Office Windfalls, Small sites, Small conversions, Live-Work Accommodation and Small Conversions.

'Non-Conventional' – Admissible Vacant Dwelling Capacity, and Non Self-Contained Permanent Accommodation).

2. For the period 1997-2001, conventional capacity completion levels fell considerably short of the phased provision indicated in the Housing Capacity Study (1056 compared with the capacity study figure of 1775 units). In the ten year period 1992-2001, a total of 2,134 additional units were provided in Harrow, equating to an annual average of 213 units, virtually identical to the average indicated by RPG3 (1996). In the five year periods, 1992-1996 & 1997-2001, a conventional capacity total of 1,078 and 1,056 units respectively were completed, at an annual average of 215 & 211 units, again virtually identical to the RPG3 average (212 units).
3. Completion levels for conventional capacity in the years 2001-2, however, totalled 819 units, an annual average in excess of 400 units. Analysis of planning approvals for the period 1997-2001 indicate a total of 2,384 units (net gain), or 477 units per annum. The corresponding figures for the last 2 years indicate a total of 1,411 units approved, or 705 units per annum. This high level of approvals has continued in 2003. These figures include some exceptionally large schemes, the scale and numbers of which are unlikely to be repeated throughout the life of the Plan. There may also be an element of double-counting of permissions between years.
4. Because of the nature of the accommodation involved, non-conventional capacity in Harrow can be expressed in terms of bed-spaces. In the period 1997-2001, the non-conventional capacity total approvals were 510, with a further 4 in 2002. In terms of completions,

a total of 468 bed-spaces was completed in the period 1997-2001, and a further 4 in 2002. Taking into account this non-conventional capacity (vacant and non self-contained accommodation), the overall total of completions in the period from 1997 –2001 was 1,524. The figure in the Housing capacity Study was 2,138 units, indicating completion levels at approximately 71% of estimated capacity for that period. Analysis of permissions for development indicates a considerably higher level of approvals than hitherto. In part this is likely to reflect a variety of new policy approaches which have been adopted in the Replacement HUDP. If the vast majority of permissions were to be implemented, continued activity at these levels would indicate that the draft London Plan figure of 6,620 units would be achieved, and possibly exceeded.

4. In attempting to derive a realistic figure for activity over the next 10 years (2004-2013) as requested by the Inspector, it is firstly, necessary to re-visit the figures on phasing contained in the 1999 Study. A crude figure could be arrived at by a pro rata apportionment of phases 2002-2006 & 2012-2016. The period 2004-2013 would thus comprise:-

2004-2006 - 1,242 units
2007-2011 - 1,257 units
2012-2013 - 458 units
2004-2013 - 2,957 units

The recent levels of approvals and completions indicate that the range of policies included in the Plan to encourage new housing development and maximise the use of urban land are facilitating development at rates exceeding those in the draft London Plan i.e. annual average of 330 units per annum.

5. An examination of performance against the figures included in the Housing Capacity Study suggests that it would be inappropriate to include a figure in the Part 2 policy for the next 10 years which mirrors the first two phases in the Study indicated above (4,208 units). It would be unrealistic at this stage to conclude that all the shortfall in the period 1997-2001 will be made up in the next 10 years, together with achieving the suggested figure of 1,257 in the period 2007-2011. However, it is also recognised that the suggested provision indicated for the later phases in the study are probably an under-estimate. Accordingly, it is suggested that it would be appropriate to include a figure for 2004-2013 that reflects the Council's intentions to exceed the figure of 6,620 units in the period 1997-2016, (assuming that sufficient numbers of large schemes continue to be brought forward).

2) **SH2: HOUSING TYPES AND MIX**

The Inspector recommended the following replacement wording for Policy SH2 which was accepted by the Panel at its meeting on 12th November 2003.:-

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 Inspector also recommended that the reasoned justification be expanded to include an acknowledgement that site specific considerations, marketability and viability might well affect the extent to which the policy aims could practicably be advanced in the individual case. It is therefore suggested that an additional paragraph be added, as follows:-

In applying this policy, the Council acknowledges that site specific considerations, marketability and viability might well affect the extent to which the policy aims could practically be advanced in the individual case.

3) EP46 AND PARA 3.139: OPEN SPACE

The Inquiry Inspector recommended – (i) that the Council refer to Paras 10-14 of PPG 17 to have a suitable policy approach to protecting open space and recreation facilities without being too inflexible to circumstances where redevelopment might be acceptable, such as either because a site can no longer make an appropriate contribution, or because compensatory provision is to be made, and (ii) additional wording be added at the end of policy EP46. The Inspector did not, however, refer to the need to revise the reasoned justification. On considering the Inspector’s recommendation, the Panel (12 November 2003) agreed that it would be appropriate to clarify why it is important to protect such areas. Together with the exceptional circumstances under which the Council would permit non-recreational uses, the following sets out the approach to, and wording of, the suggested changes to Policy EP46 and its reasoned justification.

Open Space

EP46 THE COUNCIL WILL PROTECT AND WHERE APPROPRIATE ENHANCE THE BOROUGH’S OPEN SPACES, PARKS, PLAYING FIELDS AND RECREATION GROUNDS, REGARDLESS OF OWNERSHIP. DEVELOPMENT, APART FROM SMALL SCALE ANCILLARY FACILITIES NEEDED TO SUPPORT OR ENHANCE THE PROPER FUNCTIONING OF THE OPEN SPACE, WILL NOT BE PERMITTED ON OPEN SPACES IDENTIFIED ON THE PROPOSALS MAP AND ON OTHER OPEN SPACES WITH RECREATIONAL, NATURE CONSERVATION OR AMENITY VALUE OR LOCATED IN AREAS LACKING SUCH SITES UNLESS THE

SITE IS SURPLUS TO REQUIREMENTS OR SUITABLE ALTERNATIVE PROVISION IS MADE AVAILABLE.

3.137 Protecting open space as a resource is important because once an open space is lost to built development it is difficult ~~unlikely~~ to be replaced. In protecting open spaces, due regard will be given to enhancing both the quality and quantity of open spaces and their distribution across the Borough. ~~There will be a presumption against loss of open space regardless of quality and, with the exception of ancillary facilities, built development will not be permitted unless an overriding community need has been demonstrated.~~ **Planning permission will only be granted for non-recreational development of open spaces and playing fields where it has been demonstrated that the open space is surplus to requirements and consideration to all alternative open space and recreational functions have been explored in accordance with PPG17 para10.**

Bring forward para 141 as new para 138

New para 3.138 **The quality and function of open space can be adversely affected by insensitive development.** In assessing proposals for the use of open space consideration will be given to the appropriateness of the use. To maintain the character and openness of the Borough's green spaces, ancillary buildings will be permitted only if necessary to the functioning of the open space. These should be small in scale, sensitively sited and should not compromise the open character of the space. Built development will be assessed in terms of bulk, size, design and location to ensure that it is sensitive to its surroundings. Re-use of buildings for community or leisure use, where appropriate, will be encouraged. Appropriate landscaping around new ancillary buildings will be required. Landscaping which is attractive to wildlife will be encouraged.

New para 138a

3.138a Alternative open space functions will also be considered for unused sites to prevent their unnecessary loss to inappropriate development. The Council will seek the views of communities as to how opportunities for recreation and open spaces can be delivered and apply the proposals stated in Policy SR1 and para 2.100 to development pressures likely to endanger the loss of open space and recreational facilities in the Borough. In the event that replacement open space or other open recreational facilities are brought forward, they should be at least as accessible to current and potential new users, and at least equivalent in terms of size, usefulness, attractiveness and quality.

2) T13 & SCHEDULE 13: PARKING STANDARDS & T14 & PARA 5.32: NEW DEVELOPMENT AND ON-STREET PARKING

Whilst accepting this recommendation some of the Inspectors views and comments are not entirely supported. The notion that parking provision should be at the discretion of the developer is a generous interpretation of PPG13. The PPG advises local authorities to include in the UDPs policies which indicates maximum levels of parking for broad classes of development. Paragraph 53 of PPG13 also gives local authorities the latitude to use their discretion in setting the levels of parking appropriate for small developments so as to reflect local circumstances.

It is clear from PPG13, paragraph 49 and 51 that the Government wishes to see good quality cycle and motorcycle parking in development. The Inspector's criticism of the in paragraph 5.62 is at odds with government advice. For this reason the Council does not consider its approach to be over-prescriptive and considers the inclusion of parking standards for cycle and motorcycle to be legitimate and appropriate.

The principle of reducing parking provision in area of high public transport accessibility is well established in Harrow. The need to consider Public Transport Accessibility Level (PTAL) is underscored by PPG13 paragraph 17 which says that parking standards should be revised to allow for significantly lower levels of off-street parking provision, particularly for development in locations, such as town centres, where services are readily accessible by walking, cycling or public transport. The Council does not therefore agree that its approach and the application of PTAL is at odds with the philosophy of PPG13.

Having considered the inspector's suggestion on the preferability of using gross floor space instead of net site area, it is felt that such a fundamental shift in the approach to car parking may not be a practicable solution at this stage of the UDP process. Any consideration of alternative method of calculating car-parking requirement could form part of the LDF preparation.

Replacement Policy T13

~~THE NUMBER OF OFF-STREET PARKING SPACES FOR A DEVELOPMENT SHOULD COMPLY WITH THE RELEVANT STANDARD SET OUT IN SCHEDULE 6 TO THIS PLAN. THE NUMBER OF SPACES REQUIRED FOR A DEVELOPMENT MAY BE REDUCED IN AND AROUND TOWN CENTRES OR AT OTHER LOCATIONS WHERE THERE IS GOOD ACCESSIBILITY BY PUBLIC TRANSPORT. "CAR-FREE" RESIDENTIAL DEVELOPMENTS, OR THOSE WITH VERY LOW PARKING PROVISION, MAY ALSO BE ALLOWED IN THESE AREAS, WHICH WILL NORMALLY BE COVERED BY A CONTROLLED PARKING~~

ZONE. IN THESE CASES, RESIDENTS OF THE NEW DEVELOPMENT WILL NOT BE ALLOWED A RESIDENTS PARKING PERMIT. IN ACCORDANCE WITH THE NEED TO PROMOTE SUSTAINABLE DEVELOPMENT AND TRANSPORT CHOICE, THE COUNCIL WILL EXPECT NEW DEVELOPMENTS TO MAKE APPROPRIATE PROVISION FOR CAR PARKING, BUT THIS SHOULD BE NO GREATER THAN THE MAXIMUM LEVELS SET OUT IN SCHEDULE 6. IN DECIDING THE APPROPRIATE LEVEL OF CAR PARKING IN ANY PROPOSED DEVELOPMENT, DEVELOPERS WOULD NEED TO TAKE INTO CONSIDERATION THE FOLLOWING FACTORS:

- A THE NATURE AND LOCATION OF THE PROPOSED SCHEME;
- B THE AMOUNT OF ALTERNATIVE PARKING SPACES IN THE LOCALITY;
- C PROXIMITY OR ACCESS TO OTHER MODE OF TRANSPORT;
- D ANY MEASURES PROPOSED TO PROMOTE SUSTAINABLE TRAVEL CHOICES AND REDUCE RELIANCE ON PRIVATE CAR FOR WORK AND OTHER JOURNEYS;
- E WHETHER THE PROPOSAL IS LIKELY TO CREATE SIGNIFICANT ON-STREET PARKING PROBLEMS; AND
- F THE POTENTIAL HIGHWAY AND TRAFFIC PROBLEMS LIKELY TO ARISE.

5.31 ~~In line with Government guidance the Council has adopted maximum parking standards. They are in line with the London standards set out in accordance with PPG13 and RPG3 as amended by RPG9, and the Council's commitment to sustainable development principles, the level of car parking associated with any development should not exceed the maximum set out in Schedule 6. These will ensure that new parking provision is limited, and again will assist in promoting a switch to public transport. As a general rule parking provision below the maximum will be encouraged so long as this will not result in adverse environmental and traffic problems. Such a restraint based approach should assist in promoting a switch to other modes of transport such as public transport. In general terms, the parking standards are set to complement those in neighbouring local authority areas, including those outside London. The Council considers that any If there is a significant disparity between neighbouring Boroughs, then one is likely to gain an advantage in attracting new development would give unfair advantage to one Borough over the other. Parking provision some way below the maximum may be desirable particularly allowed in locations where the Public Transport Accessibility Level (see Map 10) of the location is good, and the quality of the services within easy walking distance to other~~

~~services of the development is also good. The standards in Schedule 6 include provision for disabled people. However, operational parking (parking for essential service or maintenance staff, or those working unsociable hours), is not included in the standard, and the onus is on the developer to demonstrate to the Council that additional parking over and above the maximum standard is really necessary. Car parks visited by members of the public (e.g. for retail developments) may be suitable locations for alternative fuel refilling or recharging facilities, particularly the latter (see Policy EP8 D) and E)). Suitable sites for low or zero parking developments, where public transport provision and accessibility is good, often coincides with town centre or edge of centre locations, although there may be other locations along major corridors.~~

5.32 Car parking involves considerable land take, and in a Borough such as Harrow land for development is scarce. The Council considers car parking facilities that are only used at certain times represents a waste of a resource. The availability of alternative parking facilities in an area would be an important factor in assessing new developments, particularly in the town centres. Developers will be encouraged to seek shared use of existing car parks as a means of reducing the number of new spaces to be provided as part of a scheme. The reduction in the number of parking spaces is a strong incentive to promoting and seeking alternative modes other than the car. Any reduction in the number of private non-residential off-street spaces is generally to be welcomed. However, when considering proposals that involve the loss of off-street spaces, particularly in the town centres, possible effects on congestion and on-street parking will need to be carefully assessed.

5.32a The Council acknowledges the need for a significant reduction in road traffic and will take into account any traffic restraint measures in considering the appropriate levels of parking needed in a scheme. The location and the nature of schemes and the traffic management measures taken can influence the trip generation and the mode of transport adopted. The Council will support low or zero parking developments in suitable sites for particularly where public transport provision and accessibility is good including often coincides with town centre, or edge of centre locations, or although there may be other locations along major corridors.

5.34 Aa significant reduction in parking provision for some types of development may be appropriate where the public transport accessibility level is good or where there are alternative public car parking facilities. †The quality of the services within easy walking distance of the development is also a valid reason for car parking reduction. The council will seek effective management by

~~encouraging the shared use of available car parking spaces provided for individual developments, particularly in the town centres and where this would allow a reduction of the amount of land allocated parking spaces overall. the reduction loss of private non-residential off-street car parking may be desirable for an individual use, where this is currently provided in excess of the maximum parking standards set out in schedule ---, providing this does not result in will be encouraged so that provision is in line with the standards, unless unacceptable on-street parking problems. are likely to occur.~~

~~5.33a All retail store~~ Available parking spaces in town centres should be accessible to ~~available for use by other users. (subject to a change in line with the tariff in force elsewhere in the town centre).~~ ~~in line with PPG6, public/private partnerships covering both provision and management of shared use of car parks. will be sought.~~ Provision in addition to the maximum may be allowed for retail or leisure developments in, or on the edge of, town centres which will serve the town centre as a whole. The Council will take into account the town centre parking strategy set out in Policy T18 and any quantified need for additional public parking in the town centre when considering planning applications.

~~5.33(14) Even If a proposal provides parking in line with the standards (see Policy T13), it will not be acceptable if would lead to significant additional environmental, traffic and road safety or on-street parking problems the Council may require the developer to make a commuted payments or finance these is likely to be created (see also Policy T6). This may be satisfactorily resolved by the developer financing a Controlled Parking Zone (CPZ), or an extension to an existing one if this is merited by the development. Where the effect is small, part funding or extension of an existing of a Controlled Parking Zone may be acceptable. Certain developments may not generate on-street parking problems immediately but may do so at a later date. and Therefore funds secured from a developer would be retained for a specified period in order to implement such measures at a future date if required. It is normal to set an overall time limit after which any funds not used are returned to the developer. If the sum secured is not used within the time specified in a Planning Obligation or Agreement, this will be returned to the developer, on demand.~~

In response to the Inspector's recommendation, Schedule 6 to the Plan has also been amended, as follows:-

SCHEDULE 6 – CAR PARKING STANDARDS

Vehicle parking standards

The maximum levels of car-parking are set out below and detailed standards set out below apply equally these should be used in conjunction with Policies in the plan with respect of to development proposals involving new-build, alterations and changes of use.

Car-parking standards for non-residential development:

The level of non-residential parking provided has a major influence on peak hour traffic volumes. Car-parking provision for new non-residential development should therefore not exceed the maximum as set out in the table below:

<u>Use Class Group</u>	<u>No. of space</u>
A1 Shops	Separately designated parking to a maximum of: -for employees: 1 space per 300 – 600 m ² net site area -for customers: 1 space per 75 – 150 m ² net site area
A2 Financial & professional services	Separately designated parking to a maximum of: -for employees: 1 space per 200 – 300 m ² net site area -for clients: 1 space per 75 – 150 m ² net site area
A3 Food and drink	<u>Each development proposal to be assessed on its own merits, but:</u> <ul style="list-style-type: none"> • within a context of securing road traffic restraint; • ensuring consistency with A1, where relevant; and • with separately designated parking for customers & employees. Provision would be based on a provision of no greater than 1 space per 15 employees where such data or an estimate is available.
B1 Business & Light Industry, B2 General Industry & B8 Warehousing	Maximum of 1 space per 200 - 300 m ² net site area
B2 General Industry	(as for B1)
B8 Warehousing	(as for B1)
C1 Hotels	Each development designated Parking up to a maximum of 1 space per 5 bedrooms proposal to be assessed on its own merits, with separately designated parking for employees, visitors & customers. – subject to a normal maximum of: -for residential customers: 1 space per 5

	bedrooms.
C2 Residential Institutions	Each development proposal to be assessed on its own merits provided a restraint-based approach is demonstrated
C2 Hospitals	Maximum of 1 space per 10 bedrooms Each development proposal to be assessed on its own merits, with separately designated parking for employees, visitors & customers – subject to a normal maximum of: -for visitors: 1 space per 10 beds
C3	(see below)
<ul style="list-style-type: none"> • D1 Non-residential institutions 	Maximum of 1 space per 300 – 600 m² net site area. Each development proposal to be assessed on its own merits, with separately designated parking for employees *, visitors & customers but no provision for students – subject to a maximum of: -for employees: 1 space per 300 – 600 m² net site area, with separately designated parking for employees , visitors & customers.
D2 Assembly and Leisure	Each development proposal to be assessed on its own merits within the context of restraint based standards and the national advice maxima in PPG13.
Other non-residential buildings	Each case to be treated on its merits within the context of restraint based standards and the national advice maxima in PPG13.

Notes:

- ~~Provision would be based on a provision of no greater than 1 space per 15 employees where such data or an estimate is available.~~
- These standards will be reviewed in the context of any Mayoral guidance and/or publication of a replacement for ~~RPG3 (London)~~ the London Plan.
- Net Site Area - is the simple site area, within the curtilage, without accounting for any surrounding public highways, (as is the case with gross site area).

Adherence to the standards

Reducing or Exceeding the Parking Requirements for Non-Residential uses (Class A1, A2, B1, B2, & B8 etc)

Class A1 standards

~~In respect of land use class A1, car parking provision will normally be permitted at the “restrained” end of the quoted range. For development in town centres and in line with PPG13 the developer may negotiate with the Council to provide Consideration may be given, however, to some additional car parking provision, within outside the quoted range to take account of circumstances where existing developments, and~~

development sites, may be deemed both to be competing and to offer a less restrained level of car-parking provision, ~~as a consequence of inconsistent national and regional guidance.~~ In assessing such additional permitted car-parking provision, consideration should ~~will also~~ be given to:

- the existence, or absence, of on-street parking controls (but see Planning Obligations below);
- the availability ~~(and proximity)~~ of public off-street car-parking (for the use of visitors, clients and customers, ~~etc.~~); and
- the opportunity for dual-use of proposed/existing car-parking spaces (i.e. the extent to which spaces, provided as part of a proposed development, will be made available for use by non-occupants at different times of the day / days of the week or to which spaces, not provided as part of a development, will be made available for use by occupants of a proposed development).

~~Classes A2, B1, B2, and B8 Uses~~

~~The overall objective for parking is the presumption in favour of other modes of transport instead of car. The standards, which are maximum standards, will normally be applied as set out. In respect of land use classes A2 and B1-8, car-parking provision will normally be permitted at the “restrained” end of the quoted range. Consideration may be given, however, to some additional provision, the quoted range, to take account of circumstances where, and to what extent, accessibility of a site by public transport may reasonably be anticipated to be less than that which will exist following completion of the “core” public transport network. Consideration will also be given to:~~

- ~~• the existence, or absence, of on-street parking controls (but see Planning Obligations below)~~
- ~~• the availability (and proximity) of public off-street car-parking (for the use of visitors, clients, customers, etc.)~~
- ~~• the opportunity for dual-use of proposed/existing car-parking spaces (i.e. the extent to which spaces, provided as part of a proposed development, will be made available for use by non-occupants at different times of the day / days of the week or to which spaces, not provided as part of a development, will be made available for use by occupants of a proposed development).~~

~~Exceptional operational requirements~~

~~There is a presumption that a development will normally accommodate all its needs for operational car parking within the level of provision permitted by these standards as set out above. (Provision for commercial vehicles to load, unload or wait within a development, and for servicing arrangements, is separately addressed below.)~~

Where a developer seeks a greater than maximum level normally permitted provision of car-parking, the Council will require the need for such additional car-parking spaces to be fully justified ~~in~~ by a transport assessment statement included with the planning application. ~~for planning permission.~~

In considering whether to grant permission for such *exceptional* additional provision of car-parking spaces above that normally permitted by the standards, the Council will require to be satisfied that:

- there is a proven need for the additional car-parking spaces; such as parking for:
 - ~~cars required for use in connection with the essential business of occupier(s) of the premises and for which there is no public transport alternative, or~~
 - ~~cars of workers or visitors whose journeys to/from the premises essentially require the use of a car (i.e. disabled persons, workers subject to unsocial hours' working or workers subject to emergency call-out)~~
 - the need cannot be met by effective management of the normally permitted provision (for example, by the more efficient management of the use, or multi-use, of the permitted spaces); and
 - the Council's overall strategy will not be compromised.

Any additional car-parking spaces, permitted as a result of such consideration will be: ~~kept to an absolute minimum – and planning permission for each variation will normally be:~~

- made personal to a particular occupant (or occupants) of the premises,
- granted on a temporary basis; ~~or~~ and
- made subject to a the conclusion of a Planning Obligation agreed under the terms of Section 106 agreement. ~~of the Town and Country Planning Act 1990, as amended by the Planning and Compensation Act 1991, which may also incorporate additional provisions, as identified below.~~

~~The Council will also restrict car parking to below the standard in exceptional circumstances where the density of development is low, such as garden centres.~~

Consideration of additional provisions ~~within~~ a through a Planning Obligation

Where a proposal ~~restrained levels of parking~~ would give rise to additional on-street parking demand, contributions towards the implementation of controlled parking zones (CPZs) on adjacent streets will normally be sought as part of a ~~Planning Obligation or~~ section 106 Agreement (see Policy T13 and T14).

With respect to A1 developments in town centres, contributions towards the provision of off-street public car-parking spaces

within the centre may also be required ~~within a~~ through a Planning Obligation or Agreement.
See Policy T16 with regard to additional public parking in town centres.

Location of car-parking spaces

In respect of land use class A1, car-parking spaces will normally be provided off-street and all spaces (other than those for employees' cars) will only be available for the use of the public and of shop customers during shop opening hours. For developments in town centres, car-parking spaces for the use of customers will normally be provided as part of the centre's public car-parking provision and may be dual-use, available for evening leisure activities and avoiding the need for additional parking exclusively for these purposes (~~see Policy T15~~).

Where the size of a particular A1 development would result in more than 50 car-parking spaces for the use of customers, such spaces will normally be provided either within the development site or as public car-parking adjacent to the development. In all cases, such spaces will normally be subject to a Planning Obligation identifying agreed opening hours and charging regimes which accord with those operating in neighbouring public car-parks. ~~For development~~ In respect of an A1 development requiring less than 50 car-parking spaces, in the town centres, for the use of customers, the Council will normally encourage a developer to enter into a Planning Obligation ~~whereby the Council is obliged to secure the provision of such spaces as part of the public car-parking spaces within the centre. However, the Council will be mindful of ensuring that the overall parking availability for public use of does not increase out of proportion to increases in commercial floor space in the centre.~~

In respect of land use classes A2, B1, B2 and B8, car-parking spaces will normally be provided within the development site.

Disabled people

The Council will require fully developers to provide adequate parking dedicated provision for the use of access by disabled persons. ~~, as a condition of planning permission for development.~~ A statement, accompanying an application for planning permission, must specify the proposed provision being made for access by disabled people and such provision will be a condition of planning permission for development.

~~In respect of car-parking spaces for disabled people,~~ ~~†The Council will require~~ the provision of car-parking spaces equivalent to 4% of the predicted number of employees, customers and visitors, as appropriate, generated by a development, with such spaces:

- separately designated, by each user category; ~~, for use by,~~
and

- reserved for the sole use of persons with a disability in each specific user category, subject to the provision of a ~~minimum of 1 space in each development with 5 or more car-parking spaces.~~

(This standard will be automatically revised to adopt any new more rigorous standard promoted in national and/or regional guidance).

In respect of car-parking spaces for disabled people, the Council will require that:

- spaces are reserved for the sole use of disabled persons, separately designated for use by employees, customers or visitors, as appropriate;
 - spaces are provided as close as possible to the principal “no-step” entrance to the building; and
 - each space has a minimum bay width of 3.2m. and ~~is~~ clearly marked “reserved for the use of employees / customers / visitors with a disability (as appropriate).
 - the access path between the car-parking spaces and the principal “no-step” entrance are obstruction-free and lit at night.
- The Council may also require that car-parking spaces for disabled people are located in a manner that facilitates their inspection for enforcement purposes.

Parking layout

The design and location of car-parking areas must have regard to the convenience and personal safety of users and to the security of vehicles. ~~Developers will be required to identify the provision being made for travel by people with a disability, and by people with impaired mobility and/or vision.~~

Car-parking spaces will normally be required to be located so that the walking route between car-parking spaces and the development being served is never shorter nor more direct than: ~~the walking routes between the development and:~~

- the nearest access points to public transport services;
- pedal-cycle and motorcycle parking spaces; and
- the principal point of pedestrian access to the development site except in the case of car-parking spaces reserved for disabled people.

~~In respect of car-parking spaces for disabled people, the Council will require that:~~

- ~~• spaces are reserved for the sole use of disabled persons, separately designated for use by employees, customers or visitors, as appropriate~~
- ~~• spaces are provided as close as possible to the principal “no-step” entrance to the building~~
- ~~• each space has a minimum bay width of 3.2m. and is clearly marked “reserved for the use of employees* / customers* / visitors* with a disability” (* as appropriate)~~

~~• the access path between the car-parking spaces and the principal “no-step” entrance are obstruction-free and lit at night. The Council may also require that car-parking spaces for disabled people are located in a manner that facilitates their inspection for enforcement purposes.~~

The minimum size of a car-parking space will be 2.4m. × 4.8m., but these dimensions may need to be increased to take account of building columns, landscaping and available circulation and manoeuvring space. The width of circulation aisles will not normally be less than 6m for 90 degree parking.

~~Pedal-cycle and motor-cycle parking provision non-residential development~~

~~The Council will seek to ensure the provision of adequate, secure and weather-protected pedal-cycle parking spaces in new developments particularly those likely to attract significant cycle use. The Council will require specific pedal-cycle parking facilities to be provided on the basis of 10% of the maximum number of visitors and employees likely to be on the site at any one time being provided with 1 space each. Where it is not possible to estimate this figure, the Council will seek to secure the provision of cycle facilities on the basis of a minimum of 1 pedal-cycle parking space for each 200 sq.m. of gross floor area (gfa). Ideally any route between buildings and visitor cycle parking should be weather-protected, and the distance should be less than to the nearest car parking. The provision of cycle parking is an essential component of the Council’s policies of encouraging cycling and sustainable transport. Every effort should be made to provide spaces in a secure, attractive position. The location and form of provision shall be such as to satisfy the Council that all reasonable steps have been taken to ensure both that its security in use and its attractiveness to potential cyclists.~~

~~Such parking spaces will be provided in all cases with weather protection and, normally, with a weather-protected route between the spaces and the development being served. These routes will always be shorter and more direct than the route to the nearest car parking spaces, other than spaces reserved for disabled people.~~

Motor-cycle Parking

Depending on the nature of the development, motorcycle parking spaces should be provided for staff and visitors. As a guideline, 1 motorcycle parking space should be provided per 20 car parking spaces, subject to all developments with more than 10 car spaces having a minimum of 1 space. A minimum area of 2m x 1m should be provided, and, as with pedal cycle parking every effort should be made to provide spaces in a secure, attractive position. The provision of cycle parking is an essential component of the

Council's policies of encouraging cycling and sustainable transport. Every effort should be made to provide spaces in a secure, attractive position. They should be located closer to the building they serve than car parking spaces, and should be provided with adequate protection from the weather.

~~These standards will be reviewed in the context of London-wide guidance. See also Policy T11.~~

Provision for servicing for non-residential development

The Council will normally require off-street servicing for all new developments and will resist its loss in existing developments.

~~The Council will require the provision, within the development site, of adequate space for loading, unloading and waiting of goods vehicles, on the basis of one lorry space for each 500 m² of gross floor area (gfa) maximum. A lesser provision will be acceptable if the Council can be satisfied that the full predicted servicing demand can be met off-highway. No queuing or manoeuvring of vehicles should take place on the public highway such that road safety and the free flow of vehicles are likely to be detrimentally affected. The Council will also require to be satisfied that, where necessary, proper provision has been made for garaging commercial vehicles on the premises in a manner which prevents the use of such areas for the parking of cars.~~

~~The Council will require that areas set aside for servicing needs are designed / arranged in such a manner as to discourage their use for car-parking and may require the incorporation of specific measures to prevent the parking of cars in such areas. not designated for that purpose. The Council may also require servicing arrangements to be located in a manner which facilitates their inspection for enforcement purposes. The Council would also ensure that no queuing or manoeuvring of vehicles take place on the public highway such that road safety and the free flow of vehicles are likely to be detrimentally affected.~~

~~The Council will require that areas set aside for servicing needs are designed / arranged in such a manner as to discourage their use for car-parking and may require the incorporation of specific measures to prevent the parking of cars in areas not designated for that purpose. The Council may also require servicing arrangements to be located in a manner which facilitates their inspection for enforcement purposes.~~

~~Depending on the nature of the development, motorcycle parking spaces should be provided for staff and visitors. As a guideline, 1 motorcycle parking space should be provided per 20 car parking spaces, subject to all developments with more than 10 car spaces having a minimum of 1 space. A minimum area of 2m x 1m~~

~~should be provided, and, as with pedal cycle parking every effort should be made to provide spaces in a secure, attractive position. They should be located closer to the building they serve than car parking spaces, and should be provided with adequate protection from the weather.~~

~~These standards will be reviewed in the context of London-wide guidance. See also Policy T11.~~

~~The Council will require that areas set aside for servicing needs are designed / arranged in such a manner as to discourage their use for car parking and may require the incorporation of specific measures to prevent the parking of cars in areas not designated for that purpose. The Council may also require servicing arrangements to be located in a manner which facilitates their inspection for enforcement purposes.~~

MAXIMUM RESIDENTIAL OFF-STREET PARKING
Car-parking standards for residential development (Class C3: Dwelling Houses)

<u>Land Use</u>	Car-Parking Provision															
C3 Dwelling Houses	<p>The maximum Car-parking spaces should not will normally be provided as per exceed the following:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">habitable rooms</th> <th style="text-align: center;">resident spaces per dwelling unit</th> <th style="text-align: center;">visitor spaces</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1 or 2</td> <td style="text-align: center;">1.0</td> <td style="text-align: center;">0.2</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">1.2</td> <td style="text-align: center;">0.2</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">1.4</td> <td style="text-align: center;">0.2</td> </tr> <tr> <td style="text-align: center;">5 or more</td> <td style="text-align: center;">1.6</td> <td style="text-align: center;">0.2</td> </tr> </tbody> </table> <p>but where lesser demand will be generated because of the criteria set out in the following section on “Adherence to the standards”, levels will normally be reduced accordingly.</p>	habitable rooms	resident spaces per dwelling unit	visitor spaces	1 or 2	1.0	0.2	3	1.2	0.2	4	1.4	0.2	5 or more	1.6	0.2
habitable rooms	resident spaces per dwelling unit	visitor spaces														
1 or 2	1.0	0.2														
3	1.2	0.2														
4	1.4	0.2														
5 or more	1.6	0.2														
ii) housing association dwellings	As in (i) above															
iii) local authority dwellings	As in (i) above															
iv) old persons’ dwellings	As in (i) above															

ii v) sheltered housing dwellings	One car-parking space per 4 units, subject to a minimum of 2 car-parking spaces, + 1 space for a warden
vi) dwellings for persons with a physical disability	As in (i) above but not subject to the reductions set out in “Adherence to the standards”

Notes:

The standards for dwelling houses ~~reflect government advice~~ are based on the policies in PPG3. and work undertaken as part of LPAC’s “Sustainable Residential Quality” project; and will be reviewed in the context of developing regional guidance.

Adherence to the standards

The standards will normally be applied as set out. However, where the Council is satisfied that lesser demand will be generated the normally permitted level of parking will be reduced, firstly according to the extent to which the development reaches the highest standards of:

- ~~accessibility to/by public transport, and~~
 - ~~accessibility to local facilities, including shops, post office, health centres, etc.~~
- and secondly according to the proportion of affordable housing in the overall mix.

In proportion to the degree to which it can be demonstrated to the Council’s satisfaction, that a proportionately lesser car-parking demand will be generated, consideration will be given:

- ~~to increasing the density of residential development, and/or~~
- ~~to reducing the level of car-parking provision.~~

In all circumstances, any permitted variation in car-parking provision below the normal level will be dependent upon the Council being satisfied that there will be no additional car-parking demand generated on local streets (if necessary by ensuring the provision of a local CPZ, and making it a condition of granting planning permission that an appropriate contribution be made towards its implementation). Developments with lower than normal levels of car-parking will be designated as ‘Resident Permit Restricted’ – i.e. future occupiers will not be eligible for a resident parking permit to park on-street within any local CPZ.

Conversions will not normally be allowed if the generated car-parking/traffic demand cannot be safely accommodated on-site, or on local roads in a manner which leaves 5% residual available kerbside capacity (see Policy H10).

Reducing Residential Parking

The number of car parking spaces to be provided may be reduced in a scheme involving ~~The standards for residential dwelling~~

~~houses may be relaxed for small terrace in-fill housing or in area where it can be demonstrated that lesser car-parking will not result in significant road safety and traffic problems. Also The Council will also consider developers may offer to provide lower levels of car parking in developments that include provision for car clubs, car pools or car sharing schemes, subject to the details of the individual scheme. In appropriate cases the Council may introduce on-street parking control to minimise the potential displacement of parking where on-street parking is being limited.~~

~~Conversions will not normally be allowed if the generated car-parking/traffic demand cannot be safely accommodated on-site, or on local roads in a manner which leaves 5% residual available kerbside capacity (see Policy H10).~~

Disabled people

In developments with parking in communal areas, one disabled person's parking space shall be provided per 10 dwellings, subject to a minimum of one disabled person's parking space. Applications for planning permission must specifically identify the proposed provision being made for access by disabled people.

Layout of residential car-parking spaces

Internal layouts for residential development should take account of the need for safe, secure and direct routes for pedestrians and cyclists - before land for car-parking spaces is allocated. Particular attention will be paid to avoiding any interruption of pedestrian routes and related elements, such as traffic free "spines".

The Council will require that all road space within a development site is laid out in such a way to prevent its use for car-parking while maintaining its continuous availability for access by emergency, waste collection and other essential service vehicles.

~~The Council is currently preparing Supplementary Planning Guidance on Design that will address these issues in more detail.~~

Pedal-cycle parking for residential development

~~The Council will require that fully secure and weather-protected pedal-cycle parking spaces be provided on-site, on the basis of 1.5 resident spaces, and 0.5 visitor spaces, per dwelling. Any route between buildings and visitor cycle parking will normally be weather-protected, and the distance will always be less than to the nearest car parking.~~

~~These standards will be reviewed in the context of London-wide guidance.~~

3) H5: RESIDENTIAL DENSITY

The Inspector recommended the following re-worded policy:-

The Council will expect that residential densities in new development should be not less than 125 habitable rooms per hectare.

In his assessment, and reflected in his recommendation, the Inspector gave greater weight to PPG3, rather than the draft London Plan figure of 150 hrph. The intention of the policy is to secure a more efficient use of land. However, it would be more appropriate to include that regional figure applied to the particular circumstances in London, rather than the national policy guidance (PPG3). This is further emphasised by the need for the HUDP to be in general conformity with the London Plan. Table 4B.1 in the draft London Plan set out how a maximum contribution towards housing provision could be achieved, and indicated 150hrph as the appropriate minimum figure for suburban locations. Importantly, the EIP Panel report recommended inclusion of Table 4B.1, but advised that Policy 4B.3 in the Plan be amended to give Boroughs greater flexibility in applying the density criteria in the Table. Assuming that the figure of 150 hrph is maintained in the adopted London Plan and the Policy is amended in line with the Panel's recommendation, because of the flexibility expressed in the policy (i.e. its is not a rigid requirement), it is therefore recommended that this figure is now used. This figure would still satisfy the requirements of PPG3. It is suggested that the following replacement Residential Density policy (H5) and reasoned justification should read:-

THE COUNCIL WILL EXPECT THAT RESIDENTIAL DENSITIES IN NEW DEVELOPMENT SHOULD BE NOT LESS THAN 150 HABITABLE ROOMS PER HECTARE.

In order to secure the effective use of land, PPG3 prescribes a minimum density figure of 30 dwellings per hectare. It is appropriate to include a density minimum which satisfies this requirement. Furthermore, the policy should also reflect the approach adopted in the regional spatial strategy, the London Plan, as well as national guidance. Accordingly a minimum figure of 150 habitable rooms per hectare is included in the policy. The Council does acknowledge, however, that there may be exceptional circumstances when this minimum may not be achievable.

Whilst the primary intention of the policy is to secure the effective use of land by setting a minimum figure, the Council wishes also to ensure that the maximum contribution is made by each site to overall housing provision. Maximum housing provision will be thus be sought on each site consistent with design and amenity considerations and other policies in the Plan.

With the emphasis in the Plan being placed on a design-led approach to development, it is considered that it is inappropriate to include a maximum density figure.

4) H6: AFFORDABLE HOUSING AND H7: HOUSING FOR KEY WORKERS, AND AFFORDABLE HOUSING TARGET.

Context

The drafting of the combined policy for affordable housing and key workers for inclusion in the Proposed Modifications has taken into account a variety of material, including the Inspector's recommendation (and associated references), the draft London Plan and the EIP Panel report, government advice and statements including the consultation paper 'Influencing the Size, Type and Affordability of Housing', the West London Housing Strategy, Sustainable Communities in London, on the Council's Housing Strategy Statement 2002-7 and 2003/4 update. It has also taken account of informal officer discussions with officers of GLA and GOL. Consideration should be given to any affordable housing target, its justification, & where it should be included.

The Inspector's Recommendation on H6 and H7.

The Inspector recommended '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'.

In arriving at this recommendation the Inspector had concluded that the replacement policy should more comprehensively, and on a better researched and more articulated base, indicate how affordable provision can contribute to housing strategy in the Borough, with the reasonable assistance of developers (Inspector's Report (IR) para 6.72). He also stated that necessary attention should be given as part of the task of producing a new lead housing policy setting out the Council's overall strategy and intentions over the Plan period (IR para 6.73).

The Inspector acknowledged the complication that would be caused in re-drafting the policy by the existence of the Government's consultation paper 'Influencing the Size, Type and Affordability of Housing' (IR para 6.74), together with the issue of conformity with the London Plan (IR para 6.75).

Before a new policy can be formulated which appropriately reflects the Inspector's assessment, conclusions and recommendation, but also properly considers other circumstances which have changed both since the Plan was drafted and the round table session at the Inquiry, the Council's position in relation to these matters need to be set down and justified.

Government's consultation paper 'Influencing the Size, Type & Affordability of Housing'

The Government in July 2003 initiated a consultation on proposed changes to PPG3 Housing. The key general issue is that if the Government's proposals are brought forward, Circular 6/98 would be cancelled. Given that the Inspector has recommended that a replacement policy should be 'in accordance with the advice of Circular 6/98', there is a fundamental dilemma for the Council in redrafting a replacement policy. Does the Council proceed to agree a policy in accordance with the Inspector's recommendation, or does it place significant emphasis on changed circumstances since the Revised Deposit Draft HUDP was published? On balance, the Council considers that it would clearly be sensible to approach the re-drafting to take into account the latest government position on the subject.

Conformity with the London Plan and informal GOL advice on the approach to re-drafting the policy.

At this stage the Council does not know the detailed wording of contextual information and policies relating to affordable housing in the published London Plan. Because of this, in developing the approach to the form and content of the replacement policy, officers held informal meeting with officers from both the GLA and GOL.

In summary, the GLA officers advised that the Mayor would be likely to support a policy approach that sought 50% of all new housing in Harrow being affordable. This was because of the shortfall in affordable housing provision at the London-wide, sub-regional and local level, having taken into account the interaction of needs and supply. There was also a need for a reference to the split between social housing, intermediate housing (and acknowledgement that low cost market housing could contribute). The policy on affordable housing needed to clearly set down the Council's approach to negotiation.

The advice from GOL officers emphasised the need to refer to the government's latest thinking on affordable housing policy, the fact that it is a priority, and that appropriate regard needed to be paid to the London Plan because of the issue of general conformity.

Affordable Housing Targets and recent performance

In developing a target which is both challenging and realistic, it is essential to assess current progress against the draft London Plan affordable housing target for Harrow. This can be summarised as follows:-

Affordable Housing Targets

Draft London Plan 1997 - 2016

Total Harrow target	Annual Monitoring Target	Overall Affordable target	Total Harrow Affordable target	Annual Affordable Monitoring Target
6620	330	50%	3310	165

Affordable Housing completions over past 4 years

			Planned		Average	+/- Annual Monitoring target
2000/2001	2001/2002	2002/2003	2003/2004	2004/2005		
97	96	145	136	92	113	-52

Affordable Housing Funding Approvals over past 4 years

				Average	+/- Annual Monitoring target
2000/2001	2001/2002	2002/2003	2003/2004		
100	183	111	133	132	-33

The trend for both completions and funding approvals is definitely upwards, whilst it is acknowledged that completions lag behind. The annual monitoring targets contained in the Council's Housing Strategy Statement are a reasonable starting point, given that the HUDP should encourage an increase in the amount of affordable housing brought forward. Detailed information is contained in Housing Strategy Statistical Appendices for recent years, together with Housing Corporation allocation schedules. In addition, there are a number of schemes in the pipeline, including where an affordable housing contribution will be negotiated. The implementation of a lower threshold than has been applied for development control purposes in recent years should also contribute to increased levels of provision.

Affordable Housing Policy and Mixed-Use Development

The Draft Replacement HUDP includes Policy SD3-Mixed-Use Development, promoting mixed use schemes in appropriate locations. Clearly, where mixed use developments including 15 or more units are proposed, the replacement affordable housing policy will also apply. Although there was no recommendation or comment relating to this issue from the Inspector, to rectify the omission of an explicit reference to mixed use schemes in the replacement policy in the deposit draft HUDP, it is considered that the wording of the policy be such that

mixed use schemes are covered, and the reasoned justification confirms this, a reference now be added.

Having outlined above the reasons for the general approach to be adopted by the Council, the following replacement wording is suggested for inclusion in the Proposed Modifications.

Preamble

The Mayor of London's Housing Commission assessment of housing need in London, adjusted for new household formation figures, identified total need for affordable housing in London at 25,700 units per annum (draft London Plan). The West London Housing Strategy provides the context of need for affordable housing in West London. In Harrow, the 2003 update of the 2000 Housing Needs Survey confirmed that levels of housing need remained high and were increasing. The importance of addressing the needs of key workers is recognised as being a key challenge. With a continuing shortfall in provision it is essential that higher levels of affordable housing provision than hitherto are achieved.

The Council will aim to maximise provision of additional affordable housing from a variety of sources, including Housing Association developments, any further local authority estate renewal initiatives, negotiations on qualifying private sector residential or mixed use schemes, bringing empty property back into use, conversion of dwellings into smaller units, non self-contained accommodation, and the purchase of properties on the open market. Policies in the Plan promote such initiatives. In addition, Proposal Sites identified in the Plan will also deliver additional affordable housing units. Maximising the use of previously-developed land and buildings throughout the life of the Plan will continue to contribute to maximising provision. The 2004 Housing Capacity Study will inform the early review of the total housing provision figure, including affordable housing.

Against this context, which will be kept under regular review, it is necessary to develop a realistic and pragmatic affordable housing policy which appropriately reflects the economic realities of both providers and occupants of future affordable housing, and ensures that housing provision seeks to meet the full range of affordable housing need.

Replacement Affordable Housing Policy H6

THE COUNCIL WILL SEEK THE MAXIMUM REASONABLE PROPORTION OF AFFORDABLE HOUSING ON SUITABLE SITES OF 0.5 HECTARES OR MORE, OR ON DEVELOPMENTS OF 15 OR MORE DWELLINGS. PROVISION SHOULD NORMALLY BE ON-

SITE. IN AGREEING THE LEVEL AND FORM OF AFFORDABLE HOUSING PROVISION ON ANY INDIVIDUAL SITE, THE COUNCIL WILL HAVE REGARD TO:-

A) BOROUGH-LEVEL, SUB-REGIONAL AND REGIONAL TARGETS (SEE POLICY SH1)

B) INDIVIDUAL SITE COSTS AND ECONOMIC VIABILITY, INCLUDING THE AVAILABILITY OF PUBLIC SUBSIDY AND OTHER PLANNING OBJECTIVES.

THE COUNCIL CONSIDERS THAT THE LIKELY MINIMUM PERCENTAGE OF AFFORDABLE HOUSING TO BE NEGOTIATED ON SUITABLE SITES SHOULD BE 30%.

THE AFFORDABLE HOUSING PROVIDED SHOULD BE AVAILABLE TO PROSPECTIVE OCCUPANTS (TO BOTH INITIAL AND SUBSEQUENT OCCUPIERS).

Reasoned Justification

The Government's commitment to changing the approach to sustainable communities in order to create and maintain places where people want to live and stay was set out in 'Sustainable Communities:Building for the Future' (2003). The Government's plans to de-centralise power and strengthen regional policy was further set out in 'Sustainable Communities in London:Building for the Future' (2003). This document also set out a regional programme of action for achieving sustainable communities in London. It further also recognised that in London there is an urgent need for more affordable homes all over the capital to accommodate London growing population, reduce homelessness and ensure that workers who are key to delivery of the capital's essential services are able to afford to live and work in its communities.

Reflecting both Housing Needs Surveys in Harrow and other West London Boroughs, continued provision of affordable housing, both in terms of the numbers and types of accommodation provided, is central to the aim to create more mixed & inclusive communities, meeting regional housing requirements, and providing housing choice. It is however, important, to acknowledge that in Harrow low cost market housing is unlikely to address any housing needs in the Borough, whilst shared ownership is only affordable to a decreasing number of those in need, as a result of rising land and property prices. The draft London Plan provides the strategic framework for developing the appropriate policy to ensure necessary provision in Harrow. It further sets down the policy direction for the sub-regions within London, including the West London sub-region in which Harrow is located.

The Council defines affordable housing as 'Housing that meets the needs of households whose incomes are not sufficient to

allow them to access decent and appropriate housing, and comprises social housing, intermediate housing and may include low cost market housing. The definition also includes key workers. In identifying the needs of households in unsuitable accommodation this will be defined as the smallest number of rooms required to address their requirements. With regard to income levels, households in need of affordable housing are defined as those who cannot pay the equivalent of a periodic outgoing for the household on rent, lease or mortgage equivalent to that for accommodation of similar size and quality to meet their needs provided by a registered social landlord in the Borough. Reflecting the above definition, an appropriate proportion of key worker accommodation may be acceptable as part of the affordable housing requirement where there is a recognised local need for such provision.*

Reflecting the government's latest thinking, and particularly as expressed in the consultation paper 'Influencing the Size, Type and Affordability of Housing', the Council considers that the appropriate site size threshold for negotiating an element of affordable housing should be set at developments of 15 or more dwellings, or sites of 0.5 hectare and above. This is also generally in line with the approach taken in those Boroughs who are signed up to the West London Housing Strategy. Setting the threshold at this level also reflects the urgent need to address the continuing shortfall of affordable housing accommodation to meet the identified levels of need. The draft London Plan sets down the total housing demand and need for affordable housing in London, whilst the West London Housing Strategy identifies the sub regional situation. Locally, the 2003 update of the 2000 Harrow Housing Needs Survey, supplemented by a variety of other local sources of information, confirms the scale of on-going need within Harrow. In addition to purely residential schemes, the Council will also negotiate an element of affordable housing in mixed use schemes incorporating 15 or more dwellings.

The Council promotes the efficient use of sites, and also wishes to avoid sub-division of sites to avoid the need to comply with the policy requirements. Where part of a site, which is large enough for the purpose of this policy, is developed through a phasing of development or where the site is split into different ownerships, the Council will still expect the provision of the same proportion of affordable housing over the site as a whole as if it had been a single development.

For suitable sites, the element of affordable housing should be provided on-site wherever possible. In assessing whether a site is suitable for affordable housing the Council will take into account:- the quality of the site; size of the site; the number of units proposed; the location of the site; other relevant land use

criteria; Government guidelines; economic viability of the scheme and market conditions, and proximity to local services and facilities and to public transport. With the aim of creating more mixed and sustainable communities, on-site provision, by definition, is more likely to secure this objective than off-site provision. Where design solutions can be devised which secures the on-site provision of affordable housing, appropriate integration of such housing should be achieved. Off-site provision, either by development on another site or receipt of cash-in-lieu, is likely to be more complex and result in the delay of the provision of the affordable housing. Whilst the presumption in favour of on-site provision of affordable housing is set down in PPG3, the preference in Harrow for also for such provision, reflecting the shortage of sites, and lack of vacant or under-used sites in the Borough.

There may be exceptional circumstances, however, where the Council and prospective developer agree that on-site provision is impracticable. In such circumstances the Council may be prepared, through negotiation, to accept proposals for the affordable housing to be provided elsewhere in the Borough. The onus, however, is on the developer to justify the exceptional circumstances. Should the Council agree with the developer that such circumstances exist, it is for the developer to ensure that an alternative site is available which can be developed in a manner that will guarantee the construction of the affordable housing units, or the agreed element of affordable housing provided in another manner acceptable to the Council. If the affordable housing element of a scheme cannot be provided on the application site, or an alternative site, the Council may accept cash-in-lieu provision. The Council will prepare Supplementary Planning Guidance setting out how it will calculate cash in lieu contributions.

The Council expects the delivery of affordable housing in a reasonable time and would therefore ensure the completion of a Planning Obligation or agreement before any planning permission is granted for any scheme, or the provision of another site. It must be recognised that it may not always be possible to attract public subsidy on every site involving affordable housing, and the developer may be required to demonstrate the scheme could deliver the affordable housing without this.

In determining the mix of accommodation on any individual site, due regard will be paid to Policy H8 – Dwelling Mix. On qualifying sites the Council will normally seek a mix of family and non-family accommodation, and a split of 35%:15% of social rented to intermediate housing, consistent with the scale of identified housing need. This split also reflects the guidance set down in the draft London Plan. In agreeing the amount and form of

affordable housing to be provided, due regard will be paid to the particular circumstances and characteristics applicable to each individual site in determining the financial viability to accommodate an agreed element of affordable housing.

(Prospective occupiers – it is suggested that paras 6.36-6.37 in the Draft Replacement Plan be included, subject to amendment to acknowledge situations where the RSL tenants may exercise their right to buy).

Reflecting the re-written and updated Policy H6, additional and revised terms are suggested for inclusion in Schedule 1 – Glossary of Terms, as follows:-

Intermediate Housing – Sub-market housing substantially above Housing Corporation target rents, but substantially below open market levels. This category includes low cost home ownership schemes and key worker housing. It may include some low cost market housing where its price is close to other forms of intermediate housing.

Key Worker Housing – Regarded as housing for people in jobs that provide services deemed to be vital to the local and wider London economy and the maintenance of essential services, where there is evidence of recruitment and retention problems. A key worker is on a low to moderate income that is insufficient to allow them to access open market housing either for rent or sale and includes those employed in the public sector.

Social Housing – Housing usually provided by a Registered Social Landlord or Housing Authority, using public subsidy, at levels no higher than Housing Corporation rents.

AFFORDABLE HOUSING TARGET

Following consideration of a number of factors, including the trend in performance and levels of public subsidy available, the following policy and reasoned justification has been developed:-

THE COUNCIL WILL AIM TO SECURE AN AVERAGE ANNUAL AFFORDABLE HOUSING PROVISION OF AT LEAST 165 NET ADDITIONAL UNITS IN THE 10 YEAR PERIOD FROM THE ADOPTION OF THE PLAN.

Reasoned justification

In recent years Circular 6/98 has provided the *raison d'être* for local planning authorities to include a target for affordable housing in their development plans. Paragraph 9b) states that local authorities should indicate how many affordable homes need to be provided throughout the Plan period and/or set

indicative targets for suitable specific sites (expressed either as a number of homes or a percentage of the homes on the site).

In 2000 the Harrow Housing Needs Survey estimated that there would be 1,847 households in need per year up to 2005. The 2003 update shows a slight increase in projected housing need of 1,923 households per annum over the next 5 years. The table below summarises the need for affordable housing over the next 5 years.

The London Plan will require boroughs to have regard to regional and sub-regional housing needs as well as borough specific needs in undertaking housing needs assessments, and will require boroughs in setting affordable housing targets, to have regard to the London-wide targets set out in the London Plan. The increasing scale of housing need in London suggests that current levels of affordable housing provision are inadequate. Even accepting that it would be impracticable to suggest that all needs will be met, there is a need to increase provision.

Within Harrow, the trend for both affordable housing completions and funding approvals is upwards. The annual monitoring targets contained in the Council's 2002-7 Housing Strategy Statement are a reasonable starting point for determining the precise target, given that the HUDP should encourage an increase in the amount of affordable housing brought forward. In addition, there continue to be a number of schemes in the pipeline where an affordable housing contribution will be negotiated, as well as housing association schemes which will deliver 100% affordable housing. The implementation of a lower threshold than has been applied for development control purposes in recent years should also contribute to increased levels of provision. The Council considers that it would be realistic to aim for a provision of at least 50% of total provision as being affordable. Taking the figure of 6,620 contained in SH1 B), this would equate to an annual figure of at least 165 units. In suggesting this figure, the Council acknowledges that housing need and demand are not borough-specific, and that there is a geographical mismatch between housing need and demand and development opportunities in London, including in the West London sub-region.. This has also been recognised by the 2003 London Housing Strategy and by the new arrangements for a regional and sub-regional framework for Housing Corporation investment decisions in London. The latter will continue to dictate the levels of public subsidy/investment which will be available in West London. In determining the appropriate target for affordable housing, due regard has to be paid to the wide range of need and demand, the aim of giving everybody a decent home, the need to avoid reinforcement of social distinctions, create mixed and balanced communities, and the requirement to provide choice.

Importantly, the EIP Panel report concluded that in the context of an overall target of 30,000 additional homes per year for London, a target for providing 50% of affordable housing could be justified on the basis of the scale of housing need in London as a whole. The Council fully acknowledges that, in order to achieve a target of 50% in Harrow, affordable housing will need to be provided from a variety of sources, including Section 106 proposals. On qualifying/suitable sites where an element of affordable housing is to be provided, the Council will sensitively negotiate the amount and form of affordable housing provided, taking into account site costs, economic viability, including the availability of public subsidy. Where appropriate, regard will also be paid to other planning obligations being sought as part of the scheme.

5) H10: CONVERSION OF HOUSES AND OTHER BUILDINGS TO FLATS, AND SCHEDULE 8.

Following acceptance of the Inspector's recommendation to delete Criterion A) from policy H10, necessary amendments were required to the reasoned justification and Schedule 8. The following changes to paragraph 6.53 in the Plan are suggested in response to this recommendation:-

~~Conversions will help to achieve a better balance in the housing types as well as sizes of units created. Converted flats also provide accommodation for smaller households, and can be a valuable source of less expensive accommodation, relative to the overall housing stock. The Council, however, whilst accepting the need for more conversions, will carefully consider the scale and concentration of conversions in any locality. The need to limit the number of conversions in any area will help to ensure a mixed and balanced community. The Council acknowledges that there are some areas in which the level of conversions historically is already high and it is therefore the Council's intention to continue to encourage a good spread of conversions on individual roads and throughout the Borough rather than a concentration of these on any particular area. (See also Schedule 8 – Working Interpretations in respect of Policy H10).~~

The Inspector recommended consequential amendments are also required to Schedule 8. On reviewing the Schedule, it is now considered that it would be more appropriate to add the remaining suggested text to the end of paragraph 6.53, and to delete Schedule 8. The suggested revised wording is:-

~~SCCHEDULE 8 – WORKING INTERPRETATIONS IN RESPECT OF POLICY H10 CONVERSIONS OF HOUSES AND OTHER BUILDINGS INTO FLATS~~

~~In addition to the reasoned justifications for the policy (paras 6.52-6.60), The following working interpretations have been is set down to assist applicants:-~~

~~(i) For the purpose of applying criterion A) of the policy, a road will normally include the full length and both sides of an individually named road. However, it may be necessary for this purpose to subdivide a very long road into segments having regard to the following factors:-~~

~~— a) Clear differences in the size and type of property fronting the road (changes in character).~~

~~— b) Physical barriers and extensive breaks in the residential frontages (including other land uses and road junctions). In the case of secondary roads, each side of the road will be treated individually for the purpose of the percentage calculation and split in length, where appropriate, on the basis of the factors above.~~

~~(ii) In the first line of Policy H10, the term “conversion” is taken to mean the sub-division of a building into two or more residential units, whether this involves any physical alteration or otherwise, or other building works. (Generally there is no planning control over the internal alterations and building work involved in a residential conversion, only the subsequent use of the property).~~

~~(iii) For the purposes of calculating the level of conversions in a road (see A), any existing and valid permission for the redevelopment of existing buildings or the creation of new residential buildings should be taken into account.~~

~~(iv) For the purpose of the application of Policy H10 A) the information sources for identifying existing conversions will include:-~~

~~a) existing valid planning permissions;~~

~~b) established use certificates;~~

~~c) building control records; and~~

~~d) other Council records.~~

~~NOTE: It is impracticable to identify the actual pattern of occupation of every residential building in a road because anomalies will occur if the assessment is based on a limited site appraisal or local knowledge. For administrative expediency and to ensure a consistent approach the information base should be restricted to the above three public records. The figure of 25% was selected following consideration of information prepared on this basis but it should, however, be recognised that the actual~~

~~proportion of conversions in some roads may already be in excess of this figure.~~

6) H19: MOBILITY AND LIFETIME HOMES

The Panel was advised at its last meeting that the deletion of both Policies H19 and C20 as recommended by the Inspector would result in the Plan not reflecting advice contained in 'Planning and Access for Disabled People : A Good Practice Guide' (referred to by the Inspector in his assessment on C20). Whilst it is considered that it is not essential to develop a new Part 1 policy, as suggested by the Guide, it is necessary to still include a Part 2 policy relating to accessibility which will reflect the inclusion of accessibility matters in the draft London Plan. The EIP Panel Report expressed positive support for the inclusion of such policies, stating that Lifetime homes are an important aspect of choice at all stages of life, and of creating mixed communities (para 4.39). Accordingly, the wording of Policy H19 has been revised to take on board matters referred to by the Inspector in his assessment. . It is further considered necessary to completely re-write the reasoned justification, and to revise the heading to read 'Accessible Homes' to reflect a more inclusive approach. The revised wording is as follows:-

Accessible ~~Mobility and Lifetime Homes~~

H19 THE COUNCIL WILL ENCOURAGE THE PROVISION OF NEW HOUSING DEVELOPMENT, INCLUDING CHANGES OF USE AND CONVERSIONS OF BUILDINGS INTO FLATS, WHICH ARE CAPABLE OF MEETING MOBILITY STANDARDS TO BE ACCESSIBLE TO ALL. IN LARGER RESIDENTIAL DEVELOPMENTS OF 15 OR MORE UNITS, SCHEMES, THE COUNCIL WILL REQUIRE SEEK TO ENSURE THAT A PROPORTION OF THESE TO BE ARE BUILT AS LIFETIME HOMES STANDARDS AND OR CAPABLE OF ADAPTATION TO WHEELCHAIR STANDARDS HOUSING. ALL WHEELCHAIR HOUSING, PROVIDED AS PART OF A NEW RESIDENTIAL DEVELOPMENT, SHOULD BE IN A SUITABLE LOCATION IN ORDER TO MEET THE NEEDS OF THE OCCUPANTS.

6.82a Due to the growth in the size of elderly population and people with long-term illness the demand for accessible housing is likely to rise. Older persons and disabled people require housing designed as lifetime, accessible or wheelchair housing in order to help them retain their maximum independence. These kind of housing are in short supply in the Borough. According to the 2001 census the number of people with long-term illness in the Borough is about (30,800) 15%. Thus the potential number of people who would benefit from these types of housing is substantial. The Council's strategy is to promote the opportunity

of choice and increase flexibility in the housing stock. Lifetime homes are houses designed to meet the needs of their occupiers to cope with life events such as physical disabilities, throughout their life. Provision of housing that accommodates various stages of the human life cycle and different circumstances can contribute to a stable and sustainable community.

~~6.82~~ Although Part M of the Building Regulations requires improved access to buildings, its scope is limited to specific issues such as means of access into the dwelling, circulation within the entrance storey, accessible switches, lifts and downstairs toilet. Such requirements only allow disabled persons to gain access into dwellings, but do not guarantee their ability to live there. Accessible and Lifetime homes are houses designed to meet the needs of their occupiers to cope with events such as physical disabilities, throughout their life. Provision of housing that accommodates various stages of the human life cycle and different circumstances can contribute to a stable and sustainable community. The Council's intention is to enable disabled people, whether temporary or permanent to be able to live in their homes with minimum adaptations, if their circumstances change. Therefore, accessible and mobility lifetime homes housing represents a sustainable and flexible approach to meeting the vast majority of general housing needs and could reduce the cost of adaptations and enable people to remain in their homes because of their the accommodation is adaptable and flexible. Such property will offer greater choice to those whose mobility needs may change and can be more readily and cheaply converted if disability becomes more severe. It is important that all new residential developments are designed to enable disabled people and wheelchair users to gain access to homes except where this is made impossible by reason of the terrain or other location factors.

~~6.83~~ In order to increase the stock of housing available for occupation by disabled people, the Council will seek to ensure that at least 10% of all social housing are designed as wheelchair housing. The needs of wheelchair users are often better catered for by housing purposely designed to 'Lifetime Homes' standards and mobility standards meet their needs. In addition the Council will therefore negotiate with developers to ensure that a proportion of new housing in the Borough is designed to meet the needs of disabled people. Such standards. Such housing will offer greater choice to those whose mobility needs may change, to remain in their homes.

~~6.84~~ In addition, improving access to existing buildings to accommodate the needs of disabled people will complement Part M (Access and Facilities for Disabled People), Building Regulations 1991, which requires all new housing to be designed

~~to enable a disabled person to gain access into dwellings. Disabilities, whether temporary or permanent, have the potential to affect a large number of people at some stage in their lives. The Council will, wherever possible, require all new housing developments in the Borough to comply with Part M, which will in effect make it easier to adapt such property to the requirements of a large number of people who would prefer to stay in their homes should their circumstances change.~~

7) R5 & PARAS 8.28 and 8.29: OUTDOOR SPORTS FACILITIES

The Panel was previously advised that, in accepting the Inspector's recommendation to delete Policy R5 and its reasoned justification, there was still a need for the Plan to state the Council's stance on neglected or under-used outdoor sports facilities. It is therefore suggested that this would most appropriately be addressed by including a reference in the reasoned justification to Policy SR1, as follows:-

2.100 Parks and open spaces are an important part of community life, providing opportunities for people to enjoy organised recreation, informal leisure pursuits and contact with nature. They contribute to the attractive, open character of the Borough. The Council attaches considerable importance to the retention of adequate recreational open space and considers that neither neglect nor lack of use are acceptable grounds for change from open recreational use since a fall in demand for a certain open space or leisure activity at one time does not preclude a rise in demand in future. In view of the current rise in residential development and the population increase in the borough, the Council will endeavour to protect all valuable open space to allow for future community needs, as once it is lost it is difficult to replace.

Reflecting the implications of up- to-date information, it is suggested that an appropriate reference should be included in the reasoned justification to Policy SR1 to cross-boundary protection of open-air leisure and sporting facilities, and accessibility to sites, as follows:-

2.101 Compared with some London Boroughs, Harrow is well provided for in terms of open space and outdoor recreational facilities. Nevertheless, provision of outdoor recreational space falls below the National Playing Fields Association's recommended minimum of 2.4 hectares (6 acres) per thousand population. The Council has identified areas lacking in public open space and will identify sites for additional provision of open space. The Council recognises that some open space fulfils a strategic role, in that it is used by people living outside the Borough. In accordance with the Mayor's Draft Open Spaces Strategy, consideration will be

given to open spaces within 1km of the borough boundary when assessing availability to facilitate cross boundary planning protection of such sites.

2.102 The Council is committed to improving access to open space with amenity, recreational or nature conservation value, while at the same time ensuring that such space is protected from damage that might arise from increased use. Any increase in public access to sites will be monitored carefully, and where necessary measures taken to minimise conflict. It may not be appropriate to increase public access to all sites and in some instances partial or restricted access, for example, at a particular time or by arrangement, may be sought. Accessibility for disabled persons will be examined to ensure compliance with the Disability Discrimination Act (DDA).

8) R12: PROTECTING ARTS, CULTURE, ENTERTAINMENT AND LEISURE FACILITIES

The Inspector recommended that (i) the plan be modified by the deletion of Policy R12 and its supporting text, however, a deletion of the policy would mean that there is no protection in the Plan under any circumstances for such uses. It is therefore felt that a less restrictive policy for protecting facilities in sustainable locations would be more appropriate. The following wording is suggested:-

Protecting Arts, Culture, Entertainment and Leisure Facilities
THE COUNCIL WILL RESIST THE LOSS OF ARTS, CULTURAL, ENTERTAINMENT OR LEISURE FACILITIES THROUGH REDEVELOPMENT OR CHANGE OF USE IN SUSTAINABLE LOCATIONS OR AREAS IDENTIFIED TO BE DEFICIENT UNLESS AN APPROPRIATE REPLACEMENT FACILITY IS OFFERED.

8.23 Identifying new sites for arts, culture, entertainment and leisure facilities to cater for community needs in the future may lead to development pressures on open land for sufficient land and recreational open space. These pressures may be in out-of-town locations which are inaccessible, inconvenient and unsustainable. For this reason, the Council will require any existing redundant sites to be retained for replacement with other similar recreational functions.

12) C2: PROVISION OF SOCIAL AND COMMUNITY FACILITIES

The Panel was advised at its last meeting that although the majority of the Inspector's recommended policy rewording was acceptable, he did not recognise the need to protect existing facilities in the Borough.

Making provision for new facilities without any protection for existing ones through appropriate policies runs counter to the principle of sustainability. Existing facilities which are of particular value and of good quality should be recognised and given protection. The Council considers that this is important in a Borough with land shortages to accommodate new facilities, and suggest that the following revised wording accommodates this need, together with the Inspector's requirement for the reasoned justification to be amended to read:-

THE COUNCIL WILL ENCOURAGE THE RETENTION OF EXISTING PROVISION OF COMMUNITY FACILITIES AND SEEK THE PROVISION OF NEW ONES, PARTICULARLY IN AREAS IDENTIFIED TO BE IN NEED OF SUCH FACILITIES OR FACILITIES REQUIRED TO MEET THE NEEDS OF PARTICULAR COMMUNITIES.

- 9.13 There is a general shortage of suitable land and buildings for health, social and community uses in the Borough. In view of this the Council encourages their retention and ~~only allow change of use in exceptional circumstances~~ the provision of new facilities in order to meet identified needs. Proposals involving the loss of existing facilities or change of use will not be allowed in areas identified as deficient, unless there is suitable replacement as part of the development or in other suitable locations. The Council's preference is that existing facilities should be retained is in line with the Council's sustainability principles.

9) C20: ACCESS TO BUILDINGS AND PUBLIC SPACES

The Panel was advised at its last meeting that the deletion of both Policies H19 and C20 as recommended by the Inspector would result in the Plan not reflecting advice contained in 'Planning and Access for Disabled People : A Good Practice Guide' (referred to by the Inspector in his assessment on C20). Whilst it is considered that it is not essential to develop a new Part 1 policy, as suggested by the Guide, it is necessary to still include a Part 2 policy relating to accessibility which will reflect the inclusion of accessibility matters included in the draft London Plan, which received positive support in the EIP Panel Report. In view of this, the Council considers it appropriate to retain the policy in a revised form, whilst taking on board matters most of the matters referred to by the Inspector in his assessment, the modified policy to read as follows :-

THE COUNCIL WILL SEEK TO ENSURE THAT BUILDINGS AS WELL AS PUBLIC SPACES ARE READILY ACCESSIBLE TO ALL, PARTICULARLY ELDERLY PEOPLE AND DISABLED PEOPLE, INCLUDING WHEELCHAIR USERS. DEVELOPMENT PROPOSALS

SHOULD BE ADEQUATELY DESIGNED TO ACCOMMODATE THE NEEDS OF ALL USERS.

(9.63 –9.65 to remain unmodified)

10) PROPOSAL SITE 6: HARROW ON THE HILL STATION AND LAND IN COLLEGE ROAD AND LOWLANDS ROAD

Following consideration at the last meeting the following additional wording is suggested for inclusion as a new second paragraph in the Development Objectives, as follows:-

‘Harrow Baptist Church occupies an important position within the Proposal Site boundary and represents a significant community asset in the town centre. The retention of the church and the opportunity to integrate it with other proposed facilities, as part of the development framework, should be carefully considered. However, if a suitable scheme cannot be designed to respect the church's presence, relocation to a more appropriate part of the site, or elsewhere within the town centre, will be encouraged.’

11) NEW PROPOSAL SITE - BAE SYSTEMS, WARREN LANE, STANMORE.

In response to the Inspector’s recommendation, the following information in relation the Proposal for the site and Development Objectives and Constraints is suggested:-

Site Reference: New Proposal Site

Site Address: BAE Systems site, Warren Lane, Stanmore.

Proposal: Housing

Development Objectives and Constraints: The site has been identified as a Major Developed Site’ in the Green Belt. It is intensively developed, containing xxxx sq.m (xxxx sq.ft.) of B1 accommodation. PPG2 recognises that redevelopment of Major Developed Sites offers the opportunity for environmental improvements without adding to their impact on the openness of the Green Belt. Affordable housing policy would apply. In view of the site’s isolated location, public transport services and other measures to improve the site’s accessibility for housing will be sought.

7. Consultation

7.1 Following the receipt of the Inspector’s Report, the primary consideration has been to develop Proposed Modifications as quickly

as possible. As part of this process, and in view of the status of the London Plan, it was felt to be essential to consult both GLA and GOL officers in developing the precise wording of revised policies. Meetings have been held with officers of both bodies. When the Council's Statement of Decisions, together with the Proposed Modifications to the Plan, are placed on deposit, both the Mayor and GOL will be afforded the opportunity to comment, along with all other interested parties and organisations.

8. **Finance Observations**

- 8.1 Assuming that there is no need to re-open the Inquiry, the 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 and the preparation of Proposed Modifications are an important stage in the process for adopting the new HUDP. In preparing the Proposed Modifications, the Council has been very mindful of the pending publication of the London Plan, and the need for the Replacement HUDP to be in general conformity with it. Importantly, Counsel's opinion has been sought on the development of appropriate revised policies and reasoned justifications, and the precise wording.

11. **Background Papers**

- 11.1 UDPAP 12 November 2003 (Agenda Item 9) – HUDP – Consideration of the Inspector's Report on the Public Local Inquiry.
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

This page is intentionally left blank

Meeting:	Unitary Development Plan Panel
Date:	Monday 5 th January 2004
Subject:	Replacement Harrow Unitary Development Plan – Draft Proposed Modifications
Key decision	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder	Portfolio Holder for Planning, Development, Housing and Best Value
Status:	Public
Ward:	All
Enclosures:	Appendix A - Draft Schedule of the Council's Proposed Modifications to the Replacement HUDP

1. **Summary**

- 1.1 Following consideration of the Inspector's report, the Council is required to publish Proposed Modifications setting down the changes it has agreed. The schedule attached to this report outlines all the suggested changes to be made, with the exception of those covered by other reports on the agenda. Additional wording changes on less substantive matters are included in response to the Inspector's recommendations for the Panel's consideration, together with a few relatively minor changes reflecting changed circumstances. The schedule will be amended to reflect decisions made by the Panel on the more substantive policy changes considered elsewhere on the agenda, and then placed on deposit with the Statement of Decisions.

2. **Recommendations (for decision by Cabinet.)**

- 2.1 **To agree the draft schedule of the Council's Proposed Modifications to the Replacement HUDP, subject to including all other changes arising from consideration of other items on the agenda, and for these to be placed on deposit alongside the Statement of Decisions.**

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 was 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 place on deposit all the Proposed Modifications agreed following consideration of the Inspector's report.

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 Inspector in his report made a number of recommendations which involved modification of the revised deposit draft HUDP. Where he specified changes and /or replacement wording which was acceptable to the Council, the precise changes have now been included in the attached schedule. Where minor additional changes to wording have also been required, these are set out in the schedule, as are some minor changes reflecting changed circumstances. A report dealing with more substantive changes is included elsewhere on the agenda. Cross-references to policies in the latter report have been included in the schedule. When all the wording of these policies and reasoned justifications has been agreed, they will be added to the schedule.

6.2 Since the Revised Deposit Draft was placed on deposit in March 2002, new information, such as revised PPGs or consultation drafts, government statements have been produced. The Examination In Public (EIP) on the draft London Plan has taken place and the Panel report published. The London Plan will be published soon. Some detailed factual updating of the HUDP to reflect these has taken place, together with other essential updating, such as the references from the 2001 Census, to be included in the Proposed Modifications.

6.3 **Additional Detailed Wording Changes**

Various wording changes, primarily referring to updating of material or amplifying on matters previously recommended by the Inspector and reported to the Panel, have been included under the following headings:-

- Introduction – General – definition of 'sustainable' (Page 1 of Schedule)
- Population Context (Page 2 of Schedule)
- SD1: Quality of Design (Page 5 of Schedule)
- ST1: Land Uses and the Transport Network & Paras 2.64-2.65 (Page 5 of Schedule)
- EP7 and Paras 3.17-3.19 (Page 8 of Schedule)
- EP10 and Para 3.31 (Page 8 of Schedule)
- Paragraph 4.20 (Page 15 of Schedule)
- D5 and Paras 4.35 and 4.37 (Page 15 of Schedule)
- D25 – additional wording to be added to reasoned justification (Page 17 of Schedule)
- Para 7.18 (Page 24 of Schedule)
- EM4 and Para 7.26 (Page 24 of Schedule)
- EM5 and Paras 7.27-7-32 (Page 26 of Schedule)

7. **Consultation**

- 7.1 The Council's Proposed Modifications, together with the Statement of Decisions, will be placed on deposit in the near future. In preparing these, the GLA and GOL have been consulted, and Counsel has commented on the major proposed changes.
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 and next stages**
- 10.1 Deposit of the Proposed Modifications should represent the last major deposit stage in the process towards adopting the Replacement HUDP. Again the opportunity is afforded for organisations and individuals to make objections to, or statements of support for, any of the changes put forward by the Council. The Council will consider any representations received, and decide whether there is a need to re-open the Inquiry.
11. **Background Papers**
- 11.1 UDPAP Report – 12 November 2003 – Consideration of Inspector's Report on the Public Local Inquiry
12. **Authors**
- 12.1 Sukhpreet Seyan extension 2456, sukhi.seyan@harrow.gov.uk
Dennis Varcoe ext 2460, dennis.varcoe@harrow.gov.uk

This page is intentionally left blank

AGENDA ITEM 9- APPENDIX A

- The wording struck-through in the report shows policy and/or paragraph deletions as recommended by the Inquiry Inspector in his report.
- The underlined wording shows new wording or replacement wording as either recommended by the Inquiry Inspector or additions made to reflect new policy wording
- Where a criterion has been struck-through in Policy, consequential amendments to the letter or number of remaining criteria have been made.

INTRODUCTION

UDP Policy/Para No.	I R Ref.	Proposed Modification	Reason for Modification
Introduction General – definition of “sustainable” or “sustainability”	15	<p>Definition: <u>Sustainable development, is a concept that aims to ensure that land use planning practices create and maintain:-</u></p> <ol style="list-style-type: none"> 1. <u>economic well being through the equitable distribution of economic resources and infrastructures,</u> 2. <u>inclusive communities and a cohesive society through regeneration initiatives, helping people to help themselves, thus becoming part of the mainstream of society and enhancing their development without compromising the natural world.</u> 3. <u>effective protection of the environment and natural systems.</u> 4. <u>prudent use of the given stock of resources such as energy, water, trees, soil quality etc. and a reduction in the use of inappropriate materials which contribute towards global warming.</u> <p><u>The link between these individual objectives are important as they all overlap, and thus mixed use schemes, mixed tenure, sustainable transport networks, renewable energy installations etc are all techniques which will be promoted and employed by the Council to ensure that sustainability is being secured.</u></p> <p><u>These four sustainable development objectives need to be addressed at the same time if we are to 'meet the needs of the present without compromising the ability of future generations to meet their own needs'.</u> (The definition is to go after the 4th sentence in para 2.1 in the Introduction chapter of the Plan).</p>	Accept Inspector's recommendation

PART 1 CHAPTER 2 – STRATEGIC CONTEXT AND PART 1 POLICIES

UDP Policy/Para No.	I R Ref.	Proposed Modification	Reason for Modification
Key Diagram (Page 10)	17	KEY DIAGRAM-Include Sites of Metropolitan Importance for Nature Conservation on the Key Diagram.	Accept Inspector's recommendation
Population context paras 2.18-2.21 Para 2.18	11	<p>POPULATION CONTEXT</p> <p>2.18 Significant changes are occurring in the structure and composition of Harrow's population. With a resident population of around 213,100, the The population of Harrow has been steadily increasing in the last ten years. since the 1991 Census. The 2001 Census recorded a resident population of 206,800, but the subsequent 2002 Mid-Year Estimate for Harrow records a population nearly 5,000 higher, at 211,600. This latter figure accounts for under enumeration in the 2001 Census. Projections (currently based on the 2001 Census figures) show that Harrow's population could further increase by as much as 14-5% in the 14 years up to 2016. Whilst the The number of people of retirement age is not currently predicted to change much fall slightly in the same period. the meet Other noteworthy changes are likely to be in the an increase in the number of people aged 15-29 and 45-64. A corresponding increase rise in the number of households is also taking place. In 1991, there were approximately 75,500 households in Harrow, in 2004 it is currently estimated to be around 84,000 households, rising perhaps to 103,000 by 2016 rising to over 79,100 by 2001.</p> <p>2.19 Demographic changes need to be taken into account in the development of planning policies and proposals so that the Plan is appropriate to the needs of Harrow's population. In particular, the changing household structure, with an on-going growth in single person and other multi-person households, will need to be reflected in housing policies. It is likely that the amount, type and size of housing provided at the end of the Plan period will need to be appreciably different from the current situation, if the housing needs of residents are to be more adequately addressed. Results from recent Housing Needs and Housing Condition Surveys have informed the preparation of the Plan and the further results of from the 2001 Census and subsequent household and population projections, based on the 2002 Mid-Year Estimates will supplement this information in due course.</p> <p>2.20 The multi-cultural society in which we live is well represented in Harrow. Harrow is culturally diverse, with over 26-41% of residents were of non-white ethnic origin in 1994 2001. In four of Harrow's 21 wards over 50% of residents are from non-white minority ethnic groups. and population projections (LRG, 1999) show that this proportion is now likely to have risen to 38%, and will continue to rise over the Plan period. Community services policies, in particular, need to address the diverse cultural backgrounds and aspirations of Harrow's residents.</p> <p>2.21 In 1994 2001 65.8-68.5% of residents of working age aged 16-74 in Harrow were economically active (in work or seeking work) – early 107,000 103,000 people–and Whilst this proportion is expected to increase to just under 67% by 2016, in line with the overall population projections. the number of economically active residents may rise</p>	Updated information to reflect 2001 Census results added
Para 2.19			
Para 2.20			
Para 2.21			

		<p>by 18,000. With around 55,000 over 65,000 jobs provided in more than 7,000-7,500 businesses in Harrow (Annual Employment Survey, 1997 Business Inquiry, 2001), significant proportions of residents already work outside the Borough. An increasing economically active workforce could lead to higher levels of out-commuting, which sustainable employment and transport policies will seek to address. Unemployment levels in Harrow are traditionally lower than in many other London Boroughs, with a current unemployment rate of 2.4 3.1% (ONS, December 2000 October 2003) in Harrow. This compares to rates of 5.5-6.7% in neighbouring Brent, 3.7 4.2% in Ealing and 3.4 4.1% in Barnet.</p> <p>2.35 Sustainable development is the idea of ensuring a better quality of life for everyone, now and for generations to come. However, this must be achieved within the environmental carrying capacity of global and local eco-systems. Key to achieving this will be finding ways to accommodate and work with natural processes rather than against them. In order to determine whether a development makes a positive contribution, it is necessary to consider a wide range of factors that contribute to a development's 'ecological footprint', that is its wider impact on the environment. In particular, the location, design and built form of development should secure sustainable use of resources, facilitate sustainable lifestyles and complementary economic activities and contribute to the creation of equitable, socially inclusive communities. While it is clearly possible to enhance some renewable resources such as air, land and water, and securing an improved quality of life for residents in the Borough requires that this is carried out at every opportunity, the best that can be hoped for of non renewable resources such as coal and other minerals is that they are conserved or their rate of depletion is reduced. The pattern and distribution of land uses influences the need to travel, and the mode of transport used, and has resource implications and environmental impacts. The Council will therefore seek development that secures a distribution of land uses that reduces the need to travel, thereby saving energy and time, reducing pollution and helping to provide good air quality and which takes due account of current population trends. With regard to local biodiversity, some sites will also be 'non renewable' or incapable of replacement. Furthermore, encouragement will be given to modes of travel, such as walking and cycling, which reduce reliance on the use of the private motor car.</p>	Accept Inspector's recommendation
Para 2.37	25	<p>2.37 The location, design (including built form) and layout of buildings should minimise resource consumption, including energy and water resources, and the amount of waste and pollution produced. New development can provide an opportunity to enhance natural resources, including local biodiversity. Use of sustainable construction materials and techniques, including where possible, use of local materials and resources and disposal of waste in line with the proximity principle, will also secure the conservation of resources. The Council wishes to see good practice in all new development, encourages renewable energy and low energy schemes, and will seek demonstration projects exemplifying the principles of sustainable design, use and construction. Developments are more likely to contribute towards sustainability where they provide local employment and use local labour in their construction and maintenance. More effective use of land and resources will also be achieved by flexible forms of development that can accommodate dual or multi-use or future changes of use, new technologies or other changed requirements.</p>	Accept Inspector's recommendation

<p>SEP5: Structural Features</p>	<p>27</p>	<p>Structural Features SEP5 THE COUNCIL WILL SEEK THE PROTECTION AND ENHANCEMENT OF THE FOLLOWING STRUCTURAL FEATURES:-</p> <p>A) AREAS OF SPECIAL CHARACTER; B) GREEN BELT; C) METROPOLITAN OPEN LAND; D) GREEN CHAINS; E) PUBLIC OPEN SPACE, HISTORIC PARKS AND GARDENS; F) PRIVATE OPEN SPACE; G) EDUCATIONAL OPEN SPACE; H) ALLOTMENTS; I) CEMETERIES; J) INFORMAL OPEN SPACE; K) TREE MASSES AND SPINES; L) REAR GARDEN INTERFACES; M) AREAS EXHIBITING A HIGH QUALITY OF STREETSIDE GREENNESS AND FORECOURT GREENERY; AND N) WATERCOURSES, RIVER CORRIDORS, WETLANDS AND OTHER WATER FEATURES; <u>AND</u> O) SITES OF NATURE CONSERVATION IMPORTANCE. <u>SSSI'S AND OTHER SITES OF NATURE CONSERVATION IMPORTANCE, NAMELY THE COUNTRYSIDE CONSERVATION AREA, SITES OF LOCAL AND METROPOLITAN IMPORTANCE AND SITES PENDING SUCH DESIGNATION.</u></p> <p>IN CONSIDERING PROPOSALS WHICH AFFECT A STRUCTURAL FEATURE, AN ASSESSMENT WILL BE UNDERTAKEN OF THE CONTRIBUTION THE SITE MAKES TO THE DISTRIBUTION OF LAND USES AND PHYSICAL CHARACTER OF THE LOCALITY AND TO THE CUMULATIVE VALUE OF THE CATEGORY OF THE STRUCTURAL FEATURE IN WHICH IT FALLS.</p>
--	-----------	---

SD1: Quality of Design	28	<p>Quality of Design</p> <p>SD1 THE COUNCIL WILL SEEK REQUIRE A HIGH AN APPROPRIATE STANDARD OF DESIGN AND LAYOUT IN ALL DEVELOPMENT REQUIRING PLANNING PERMISSION AND WILL REQUIRE THAT ALL SUCH DEVELOPMENT MAKES A POSITIVE CONTRIBUTION TO WITH THE AIM OF IMPROVING THE QUALITY OF THE BUILT ENVIRONMENT, FACILITIES FACILITATING ACCESS, ESPECIALLY BY SUSTAINABLE MODES, AND ENHANCING THE CHARACTER AND APPEARANCE OF THE BOROUGH.</p>	<p>Accept Inspector's recommendation in part. Alternative wording referring to seeking high quality design in all new development would provide more consistent wording with PPG1 and PPG12.</p>
ST1: Land Uses and the Transport Network and paras 2.64 and 2.65	30	<p>Land Uses and the Transport Network</p> <p>ST1 PROPOSALS FOR THE DEVELOPMENT AND REDEVELOPMENT OF LAND AND BUILDINGS IN THE BOROUGH MUST ACCORD WITH THE POLICIES WITHIN THE HARROW LOCAL TRANSPORT STRATEGY AND IN PARTICULAR, WITH THE FOLLOWING CRITERIA:-</p> <p>A) MAJOR TRIP-GENERATING DEVELOPMENTS SHOULD BE LOCATED WHERE THERE IS GOOD PUBLIC TRANSPORT, CYCLE AND PEDESTRIAN ACCESS;</p> <p>B) NEW DEVELOPMENTS WHICH EXPAND THE RANGE OF FACILITIES, INCLUDING LOCAL FACILITIES, THAT CAN BE VISITED IN ONE TRIP WILL BE ENCOURAGED TO LOCATE IN TOWN CENTRES;</p> <p>C) MIXED-USE AND HIGHER DENSITY DEVELOPMENT WILL BE ENCOURAGED TO LOCATE WHERE PUBLIC TRANSPORT ACCESS IS GOOD.</p> <p>D) IMPROVEMENTS TO THE PUBLIC TRANSPORT NETWORK WOULD BE FACILITATED TO MEET THE INCREASE IN TRAVEL DEMAND;</p> <p>2.64 The Council's overall aim is to improve the quality of the local environment through promotion of alternative modes of transport other than the car and the reduction in the amount of journeys made. The Council's policy which seeks to concentrate major facilities in areas of good accessibility Local Transport Strategy will comprehensively set out complements its the Council's vision for tackling the growing congestion, pollution and environmental damage caused by motorised traffic=, set out in the Local Transport Strategy. The Strategy forms the basis on which bids for transport infrastructure funds are made annually to central government. These bids are made within the Council's annual Local Implementation Plan (LIP). During the time period covered by the HUDP, the projects submitted through the LIP bid for funding will vary, as new opportunities arise. It is will be essential to ensure that the land use effects implications of major developments these are fully assessed and in accord with the HUDP's policies, and conversely, that any proposals for development do not prejudice other Council's policies. the infrastructure projects in the LIP, planned or underway. The policy also supports the wider strategic aims of traffic reduction, promoting and encouraging walking and cycling and ensuring the vitality and viability of town centres.</p>	<p>Accept Inspector's recommendation</p>
Para 2.64			

Para 2.65		<p>2.65 The guiding principles for the location of all new development as indicated are set out in this the policy. They are in accordance with current central government guidance. It should enable major trip-generating developments are these where sufficient numbers of people will visit the facility to be located in a more sustainable way and without detrimental effect on cause a significant difference in either traffic flows, or the public highway network or the public transport network. around it. These developments might include large retail, employment and housing developments, as well as leisure or community facilities. The <u>location grouping together</u> of complementary facilities - whether in Harrow Metropolitan Centre, or in the District and Local Centres - encourages several journey purposes to be carried out in one trip. Good local facilities can help to shorten distances travelled, and short distances are more likely to be walked or cycled. The careful siting <u>location</u> of new developments in relation to the transport infrastructure is one of the main contributions land use planning can make towards creating a more sustainable Borough, where the impact of everyday activities on the environment is minimised.</p>	
SH1 Housing Provision and Housing Need	36	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
SH2 : Housing Types and Mix	37	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
SEM1: Development and the Borough's Regeneration Strategy	38	Add to Schedule 1: Glossary of Terms: 'Regeneration: An holistic approach to improving geographical areas which experience one or more of the following: high unemployment, poor housing, social exclusion, environmental decline, high incidence of ill health, compared to surrounding areas. Problems are tackled with an inter-disciplinary and inter-agency approach.'	Accept Inspector's recommendation

Para 2.90	39	<p>2.90 The term "Town Centres" denotes, collectively, Harrow Metropolitan Centre, the District Centres and the Local Centres. The hierarchy is based upon the one set out in RPG3, and reflects the draft London Plan LPAC-1006 Supplementary Advice on Strategic Town Centres. Harrow Metropolitan Centre, District and Local Centres and local parades/shops provide the major locations for shopping and office employment in the Borough. The hierarchy is shown on the Proposals Map. The Town Centre hierarchy is not a rigid assessment of the differing sizes and strengths of individual centres. It is acknowledged that the position of a centre in the hierarchy may change in time, according to the relative health of its retail and other town centre functions, or as they adapt to emerging trends and roles. The Council regularly monitors the health of all the town centres, in order to gain early warning of any problems, and address them. However, a change in the functions of the centre could still occur, <u>after consultation</u>, including with <u>local community organisations</u>, and the Council will consider reclassifying a centre if this would be beneficial to its vitality and viability. For example, housing could be a beneficial use to take the place of some retail units once a permanent and structural reduction in the retail element has been identified. The Council proposes to keep the hierarchy under review and modify it if necessary.</p>	<p>Accept Inspector's 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'.</p>
Para 2.100	155	<p>Subject to detailed consideration under the Inspector's recommendation for Policy R5 in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.</p>	

PART 2 CHAPTER 3 – ENVIRONMENTAL PROTECTION AND OPEN SPACE

UDP Policy/ Para No.	I R Ref.	Proposed Modification	Reason for Modification
Para 3.4	45	<p>3.4 Links between development and water supply, quality and availability have long been recognised. Planning has an important role to play in safeguarding water resources by providing a framework that ensures development does not have adverse impacts on watercourses, water quality or lead to flooding and secures a more sustainable approach to water supply, quality, use and drainage. Flooding can endanger lives and cause damage to property. PPG25: Development and Flood Risk (Consultation draft - 2001) emphasises the positive role of land use planning in reducing flood risk, by guiding, regulating and controlling development so that it does not increase flood risk. Authorities are advised to apply the precautionary principle to decision making and to consider how climate change may affect flood risk over the lifetime of developments. It is also acknowledged that watercourses perform important roles in nature conservation, including acting as Green Chains and Green Corridors, as well as being <u>wildlife habitats in their own right.</u></p> <p>3.4a Watercourses, river corridors and their associated floodplains provide important linking habitats to both people and wildlife alike. As landscape features they perform an essential function in both conveying water during normal flows and accommodating and attenuating flood waters.</p>	Accept Inspector's recommendation
Para 3.4a EP7 and Para 3.17	46	<p>Renewable Energy EP7 THE COUNCIL WILL ENCOURAGE RENEWABLE ENERGY SCHEMES, SUCH AS PASSIVE AND ACTIVE SOLAR SCHEMES, AND SMALL-SCALE WINDPOWER AND OTHER APPROPRIATE RENEWABLE TECHNOLOGIES BY:-</p> <p>A) REQUIRING NEW DEVELOPMENTS TO BE DESIGNED IN SUCH A WAY AS TO MAXIMISE THE POTENTIAL FOR PASSIVE SOLAR ENERGY AND NATURAL VENTILATION AND, WHERE PRACTICABLE, TO ACCOMMODATE FUTURE INSTALLATION OF SOLAR PANELS TO INCORPORATE PHOTOVOLTAICS OR ACCOMMODATE THEIR FUTURE INSTALLATION;</p> <p>B) SUPPORTING INNOVATIVE PROPOSALS AND DEMONSTRATION SCHEMES;</p> <p>C) PROVIDING ADVICE, INCLUDING SUPPLEMENTARY PLANNING GUIDANCE AND ADVICE ON GRANTS,</p> <p>PROVIDED THERE IS NO UNACCEPTABLE IMPACT ON THE ENVIRONMENT OR RESIDENTIAL AMENITY.</p> <p><u>THE COUNCIL WILL REQUIRE NEW DEVELOPMENTS TO BE SO DESIGNED AS TO MAXIMISE THE POTENTIAL, TO THE EXTENT THAT THIS IS PRACTICABLE, VIABLE AND CAUSE NO UNDUE HARM TO THE ENVIRONMENT OR RESIDENTIAL AMENITIES, OF RENEWABLE ENERGY SCHEMES SUCH AS MAKE USE OF SOLAR ENERGY, PHOTOVOLTAICS AND NATURAL VENTILATION.</u></p>	Accept Inspector's recommendation

Para 3.17		<p>3.17 The Government's focus on renewable energy has increased, and has been reflected in the Energy White Paper (February 2003), and the Mayor's draft Energy Strategy (January 2003) and other sustainable energy strategies. The Council encourages and emphasises the need for much greater energy efficiency and a growing reliance/progression on renewable energy sources such as solar energy, wind power and bio energy to meet the UK target for carbon reduction. The Council will facilitate and promote energy installations in the borough to:</p> <p>A) promote sustainable energy from these beacon installations and</p> <p>B) raise awareness of renewable energy within the broad community.</p>	
EP8 and Para 3.25: Energy Supply and Generation	47	<p>Energy Supply and Generation</p> <p>Policy EP8 and its reasoned justification to be deleted.</p>	Accept Inspector's recommendation
EP10 and para 3.31	48	<p>Water Quality, Supply and Disposal</p> <p>THE COUNCIL WILL NOT PERMIT DEVELOPMENT WHICH IT CONSIDERS LIKELY TO HAVE AN ADVERSE EFFECT ON</p> <p>A) RIVER CORRIDORS, OR</p> <p>B) THE WATER OR ECOLOGICAL QUALITY OF RIVERS, LAKES, GROUNDWATER OR OTHER WATER AREAS, WHETHER BY SURFACE OR WASTE WATER DISCHARGE, DISTURBANCE OF CONTAMINATED LAND, OR OTHER ACTIVITY (INCLUDING ABSTRACTION)</p> <p>3.31 The Council will encourage proposals that enhance and protect the water environment for the purposes of conservation, recreation and habitat improvement. Developers will be expected to ensure their proposals do not harm the water quality of rivers, lakes and other water areas and to take any steps necessary to prevent this. The river corridor must be retained and where possible restored such that no development will be permitted within 8 metres of top of bank of main rivers, or within 5 metres of ordinary watercourses.</p> <p><u>Water environments are important wildlife habitats and make a valuable contribution to biodiversity. The Council will need to be satisfied that proposed development will not harm the aquatic environment before granting permission and may, by condition or agreement, require measures to be taken to protect or improve water quality through better management or sensitive planting, to protect and enhance ecological quality and biodiversity. The Council, in conjunction with the Environment Agency, will seek to restrict development that would have a detrimental impact upon water <u>water quality</u> habitat value and biodiversity, both of which are dependent on good water quality. Every opportunity will be taken to environmentally enhance the value of the river corridors whether in relation to development proposals through the planning process or through other Borough initiatives.</u></p>	Accept Inspector's recommendation
New Para			

<p>EP11 and Para 3.34: Sustainable Urban Drainage Para 3.34</p>	<p>49</p>	<p>Sustainable Urban Drainage EP11 NEW DEVELOPMENT AND REDEVELOPMENTS WILL BE EXPECTED TO INCORPORATE SUSTAINABLE URBAN DRAINAGE SYSTEMS WHERE PRACTICABLE.</p> <p>3.34 RPG3 points out the need for development to be planned so that it does not run ahead of the necessary provision of water supply and infrastructure. SUDS control the volume, speed and quality of run-off at source or before it reaches watercourses, are closer to natural drainage patterns and can include rainwater harvesting and grey water recycling, which reduces water demand. SUDS can help recharge groundwater, which in turn helps sustain river flows. Where existing infrastructure, for sewerage, drainage and water supply, is close to capacity, SUDS may enable development to be built to a higher density than would otherwise be the case. SUDS should be considered in the first instance for all sites over and above traditional piped systems. There are many types of SUDS and which is appropriate will depend on factors such as site characteristics and the nature, scale, and location of development proposed. However the Council recognises that there may be occasions when SUDS is not an appropriate system for the drainage of surface water from the site. The Council will consult with the Environment Agency, sewerage undertakers and water authorities, <u>including seeking ecological advice</u>, regarding the implementation of SUDS.</p>	<p>Accept Inspector's recommendation</p>
<p>Para 3.46</p>	<p>50</p>	<p>3.46 New development normally increases surface water run-off, where permeable surfaces are replaced by impermeable surfaces such as roofs and paving, and through compaction from vehicular movement. Increasing the risk of flooding, pollution and silt deposition, untreated run-off damages habitats and leads to river instability. Effects can occur at a distance remote from the development. Flood risk management needs to be applied to the whole river catchment and not be restricted to floodplains. Developers are advised to give careful consideration to the role that trees, open land, <u>including where appropriate, rough grassland and scrub</u>, and vegetation play in slowing down the flow of rainwater into the drainage system, offsetting some of the adverse effects of surface water run off. In areas susceptible to flooding or where significant surface water run off can be expected to result from new development, the Council may require trees to be retained, additional trees to be planted, and soft landscaping/open land to be retained for these purposes. The Council, where appropriate in consultation with the Environment Agency, will assess the surface run-off implications of new development proposals and the environmental impact of such proposals. New developments will only be permitted where the Council is satisfied that suitable measures designed to mitigate the adverse impact of surface water run-off into non-main rivers and watercourses are included as an integral part of the development. Where appropriate the development should include provision for the long-term management of these measures. Consideration should be given to the use of SUDS, retention of vegetation and role of tree planting in reducing surface water run off and hence reducing flood risk. The Council seeks to sustain the natural drainage processes within catchments and will normally require new development and redevelopments to incorporate sustainable urban drainage systems such that the 1 in 100 year critical storm is attenuated on site. Policy EP11 gives further guidance on sustainable drainage systems.</p>	<p>Accept Inspector's recommendation</p>

<p>Para 3.54: Waste Management, Disposal and Recycling Facilities</p>	<p>52</p>	<p>3.54 Each year, the Council collects around 75,000 tonnes of household and commercial waste; a further 30,000 tonnes is delivered to the Civic Amenity Site. However, this accounts for less than half the waste arising in the Borough. Much of the Borough's waste is non-household waste, and includes construction, demolition, industrial and commercial wastes whose disposal is managed by the private sector. Household waste is projected to grow 2-3% a year. During 1998/9 household waste grew by 6% across the West London Waste Authority catchment area. If waste continues to grow at 3% a year the volume of waste produced would double in twenty years time; at 6 percent growth waste would double in less than twelve years <u>about 12 years</u>.</p>	<p>Accept Inspector's recommendations</p>
<p>Para 3.87</p>	<p>56</p>	<p>3.87 The Council wishes to extend opportunities to enjoy the natural environment to all the Borough's residents and will encourage the creation of locally appropriate new habitats where possible. Under the European Habitats Directive, member states are required to encourage the management of features of the landscape which are of major importance for wild flora and fauna. Plans should be concerned not only with designated areas, but also with other land of conservation value and the possible provision of new habitats. Among the variety of habitats that exist within the Borough, are heathland, a national priority habitat, woodland, including an ancient woodland at Bentley Priory and wetlands. A variety of habitats exist within the Borough, including a number of National Priority Habitats such as Lowland Heathland, Ancient/Species-rich Hedgerow and Wet Woodland. In addition, there is a range of woodland types, including ancient woodland, as well as wetland and grassland. Whilst habitats can decline as a result of natural processes (succession) or neglect, through positive and appropriate management they can be protected, enhanced and in some instances created.</p>	<p>Accept Inspector's recommendation</p>
<p>Para 3.90</p>	<p>57</p>	<p>3.90 Certain species of flora and fauna are protected by national and international legislation and Local Planning Authorities are required to have regard to these when determining planning applications. In addition, 'protected species' in Harrow include priority species in national, London and local biodiversity action plans. Planning permission will not be granted for development or land use changes which would have an adverse impact on badgers or species protected by Schedules 1, 5 or 8 of the Wildlife and Countryside Act 1981, as amended, or priority species or habitats in national, London or local biodiversity plans (including species in neighbouring boroughs' plans where habitats overlap). <u>Where development is likely to affect badgers or habitats of species listed in the Wildlife and Countryside Act, English Nature should be contacted. Other animals protected by the Act vulnerable to development, include bats, water voles, great crested newts and other species of newt, lizards, slow worms and nesting birds.</u> Some examples of animals receiving protection under the Act include nesting beds, all bat species and their roosts: kingfisher, fieldfare, redwing, hobby: water vole and great crested newt. Measures should be taken to protect habitats before, during and after any development that may have an adverse impact. Badgers are protected under the 1992 Protection of Badgers Act and a licence from English Nature is required to permit interference with a sett. A list of protected species in London is set out in the London Ecology Unit booklet 'Protected Species in London' and in the London Biodiversity Audit (2000).</p>	<p>Accept Inspector's recommendation</p>

<p>EP28 and Paras 3.92, 3.96 and 3.97: Conserving and Enhancing Biodiversity</p>	<p>59</p> <p>Conserving and Enhancing Biodiversity EP28 THE COUNCIL WILL CONSERVE AND ENHANCE BIODIVERSITY BY:-</p> <p>A) RESISTING DEVELOPMENT THAT WOULD HAVE AN DIRECT OR INDIRECT ADVERSE IMPACT ON SITES OF SPECIAL SCIENTIFIC INTEREST, STATUTORY LOCAL NATURE RESERVES, OTHER SITES OF IMPORTANCE FOR NATURE CONSERVATION, COUNTRYSIDE CONSERVATION AREA AND GREEN CORRIDORS;</p> <p>B) ENSURING THAT ALL DEVELOPMENT PROPOSALS TAKE ACCOUNT OF NATURE CONSERVATION WHERE RELEVANT AND ENSURING THAT ALL DEVELOPMENT PROPOSALS <u>CONSIDERED LIKELY TO MATERIALLY AFFECT ON SITES OF NATURE CONSERVATION IMPORTANCE TAKE INTO ACCOUNT THEIR IMPACT ON WILDLIFE AND THE ECOLOGY OF THE SITE;</u></p> <p>C) ENCOURAGING DEVELOPERS TO RETAIN HABITATS AND FEATURES OF VALUE TO ENHANCE THE NATURE CONSERVATION INTEREST OF SITES AND MAKE PROVISION, WHERE APPROPRIATE, FOR PEOPLE TO ENJOY THESE FEATURES;</p> <p>D) IDENTIFYING SITES FOR STATUTORILY AND LOCALLY DESIGNATED NATURE RESERVES IN CONSULTATION WITH ENGLISH NATURE AND REGIONAL AND LOCAL NATURE CONSERVATION GROUPS;</p> <p>E) WHERE THE COUNCIL CONSIDERS IT APPROPRIATE, REQUIRING DEVELOPERS TO DEMONSTRATE HOW THEIR PROPOSAL WILL IMPACT UPON WILDLIFE AND NATURAL FEATURES AND CONTRIBUTE TO CONSERVING AND ENHANCING BIODIVERSITY IN THE BOROUGH ; <u>AND</u></p> <p>F) ENSURING THAT ANY LOSS OF HABITAT (EG WOODLAND, WETLAND) IS COMPENSATED BY PROVISION OF AT LEAST AN EQUIVALENT AREA OF HABITAT UNDER THE TERMS OF A PLANNING OBLIGATION;</p> <p><u>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.</u></p> <p>3.92 Harrow's environment supports a wide diversity of wild plants, birds and animals. In recent years certain species have declined or come under threat as a result of human activities, including development. The Council wishes to retain and enhance this diversity in recognition of the many benefits this brings - social, educational, economic - to the Borough's residents and will promote awareness and enjoyment of the natural environment. Key to maintaining diversity is the protection, <u>appropriate management</u> and enhancement of habitats throughout the Borough. Identification of nature reserves and protection of Sites of Special Scientific Interest (SSSIs) is an important element, but it is also important to consider existing or potential habitats within open spaces, housing areas, gardens, playing fields, industry and public utilities (space around buildings, vacant land), along road verges and railway land. Such sites may be worthy of protection ecologically and may be enhanced by appropriate management.</p>	<p>Accepted Inspector's recommendation</p>
<p>Para 3.92</p>		

<p>Para 3.96</p>		<p>3.96 In assessing the relative weight to be attached to the benefits of a proposal that is likely to have an adverse ecological impact, consideration will be given as to whether the site or proposal is of local, Borough or strategic benefit. Permission will only be granted where it can be shown that the resulting benefit(s) significantly outweighs the nature conservation value of the site. <u>It is not envisaged that this would be so for designated sites such as SSSIs, Sites of Nature Conservation Importance or statutory Local Nature Reserves.</u> In such circumstances, any loss of habitat should be compensated by provision of at least an equivalent area of habitat land. <u>On this land a habitat should be created which is of equal or greater nature conservation value than that lost.</u> The retention of extensive tree cover, shrubs, hedgerows and other natural habitats, such as lakes, is an essential element in the Council's Nature Conservation Strategy. New planting will be desirable and normally appropriate native species, preferably from native stock, should be planted. Only in more formal settings will foreign or exotic species be recommended. Advice on wildlife friendly planting is to be produced as Supplementary Planning Guidance.</p> <p>3.97 Bentley Priory Open Space (a Local Nature Reserve) and <u>land adjacent to Harrow Weald Common</u> contain important habitats and geological features respectively. <u>These are nationally important sites</u> and have been designated by English Nature as SSSIs. Visitors can, by their numbers, have an adverse impact on these areas. The Council will control access by maintaining footpaths, hedges, fences and signposts which encourage people to visit less sensitive habitats and avoid areas where human access would conflict with nature conservation aims. The Council will seek the opinion of English Nature and Harrow Nature Conservation Forum before designating new nature reserves.</p> <p>(Reasoned justification paras where no change is required are not included within the schedule).</p>	
<p>EP30 Para 3.107</p>	<p>61</p>	<p>EP30 Tree Preservation Orders and New Planting</p> <p>3.107 Trees die from natural causes, and damage and tree loss is exacerbated by heavy storms. Trees are also vulnerable to pollution. There is therefore an on-going need to protect existing trees and plant new ones (see also policy D11). As part of the Council's policy for the planting of new trees, consideration will need to be given to appropriate replacement of trees which have been lost. Trees may be of value as individual trees or as a group, for their intrinsic interest, amenity value, or value to the overall landscape of the Borough, and the Council wishes to protect existing trees for this reason. Similarly, new trees may also fulfil any one of these functions. The Council will seek the planting of new trees by a number of agencies and individuals, in order that the biodiversity, landscape and environmental quality of the Borough are maintained and/or enhanced. The Council will undertake additional tree planting, including of street trees, during the Plan period, as resources permit. Tree planting will not be encouraged in places where it could be detrimental to the current or potential nature conservation value of open habitats, such as grassland, heathland or wetlands. It may be necessary to control natural colonisation of trees in these habitats. In individual private gardens, the Council will encourage owners to replace trees lost, or developers to implement landscaping schemes in new developments, which will enhance the biodiversity and environment of a locality.</p>	<p>Accept Inspector's recommendation</p>

Para 3.117	70	<p>3.117 PPG2 (Annex C) recognises the presence of some major developed sites in the Green Belt which may be in continuing use or redundant. In dealing with such sites, the Council will consider the extent of the development and any development brief for the site. In addition, any future development proposals would need to conform to the criteria set out in paragraph C3 and C4 as well as paragraphs C15-C17 of PPG2 Annex C, in association with the policies of this Plan. <u>The development envelope for Harrow College (Weald Campus), indicating substantially the existing extent of development, is shown on the Proposals Map.</u></p>	Accept Inspector's recommendation
<p>EP41A: Watling Chase Community Forest Para 3.126a</p>	72	<p>EP41A Watling Chase Community Forest 3.126a The Watling Chase Community Forest covers an extensive area in Hertfordshire stretching down to the northern edge of London. The intention is to create a large well wooded 'forest' landscape for wildlife, work, recreation and education. Although only a small part of the Forest lies within the Borough (see Text Map 3B), the Council wishes to support the principles behind its creation as set out in the Community Forest Plan, and appropriate proposals which contribute to its development. Where appropriate, the Council will support proposals which facilitate improved access to the countryside and provide appropriate outdoor leisure and recreation facilities. All proposals within the Forest should include landscaping proposals that are compatible with their location within this part of the Forest. This will usually involve tree planting and/or landscaping that enhances the current landscape. The Council will consider the need to produce Supplementary Planning Guidance where this will assist the development of the Forest.</p>	Accept Inspector's recommendation
<p>EP46 and Paras 3.137 and 3.141 and a new para: Open Space</p>	78	<p>Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.</p>	
<p>EP49 Informal Areas of Open Space Para 3.153</p>		<p>3.153 Small open spaces have a vital role to play in creating an attractive urban environment and can support a variety of plants and wildlife, thereby providing opportunities for people to enjoy nature close to where they live. Informal and incidental open spaces can contribute to Biodiversity Action Plan objectives. <u>The Council encourages sustainable ecological projects in partnership with the local community and others. The development of agreed management plans will enable the local community to play an active role in securing ecologically sound nature conservation management of appropriate sites on informal and incidental open spaces. A network of inter-linked open spaces will create conditions for a wider range of species to thrive than would be possible with isolated spaces. Consideration will also be given to identifying, creating and enhancing links between smaller open spaces and larger open spaces or areas of nature conservation into rest, where resources permit. Only in exceptional circumstances where sites are devoid of nature conservation and amenity value (existing or potential) and serve no other useful purpose (such as breaks in the urban fabric, play areas), will their use for off-street parking or extensions to gardens or houses be permitted.</u></p>	Accept Inspector's recommendation

CHAPTER 4 – DESIGN AND THE BUILT ENVIRONMENT

UDP Policy/Para No.	IR Ref	Proposed Modification	Reason for Modification
Para 4.10: Design and Built Env. Objectives	81	<p>DESIGN AND BUILT ENVIRONMENT OBJECTIVES</p> <p>4.10 i) To ensure that development secures the most efficient and effective use of land through good design, thereby enhancing the built environment;</p> <p>ii) To promote more sustainable types and layouts of development, including mixed use development; and</p> <p>iii) To seek the preservation <u>protection</u> and enhancement of the historic environment.</p> <p>iv) To promote more sustainable travel patterns through layouts and design, giving greater priority to pedestrians, cyclists and public transport users in appropriate cases.</p>	Accept Inspector's recommendation
Para 4.20	84	<p>4.20 Parking spaces within new developments should be located as close as possible to the buildings they serve, especially in the case of residential development. If this is not possible, then small groups of off-street parking spaces with good linkages to the housing should be provided. Car parking should be considered as an integral part of the overall design of a development, and spaces located conveniently to the buildings they serve. However, this should not be at the expense of secure and convenient access by other transport modes. The provision of safe and direct routes for pedestrians and cyclists, and links to public transport, should be considered before land for car parking is allocated, especially in residential development. Parking space within residential curtilages should be sited to minimise its visual intrusion and suitable landscaping and boundary treatment provided to ensure that parked cars do not dominate the streetscene. Where off-street or courtyard parking is provided, bays should be located in small groups, overlooked by adjoining buildings and passing pedestrians, with good linkages to the housing. Road design will need to ensure that inappropriate car parking is discouraged so that continuous access for emergency and other essential vehicles is maintained.</p>	Accept Inspector's recommendation
D5: New Residential Development - Amenity Space and Privacy	85	<p>New Residential Development - Amenity Space and Privacy</p> <p>D5 NEW RESIDENTIAL DEVELOPMENT SHOULD:-</p> <p>A) PROVIDE AMENITY SPACE WHICH IS SUFFICIENT:-</p> <ol style="list-style-type: none"> 1) TO PROTECT THE PRIVACY AND AMENITY OF OCCUPIERS OF SURROUNDING BUILDINGS; 2) AS A USABLE AMENITY AREA FOR THE OCCUPIERS OF THE DEVELOPMENT; AND 3) AS A VISUAL AMENITY. <p>FAMILY ACCOMMODATION SHOULD BE LOCATED AT GROUND FLOOR WHEREVER POSSIBLE, WITH ACCESS TO PRIVATE GARDEN SPACE;</p>	Accept Inspector's recommendation

		<p>B) MAINTAIN ADEQUATE SEPARATION BETWEEN BUILDINGS AND DISTANCE TO SITE BOUNDARIES IN ORDER TO PROTECT THE PRIVACY AND AMENITY OF OCCUPIERS OF EXISTING AND PROPOSED NEW ADJOINING DWELLINGS. PROPOSALS SHOULD PROVIDE SPACE AROUND BUILDINGS TO REFLECT THE SETTING OF NEIGHBOURING BUILDINGS; AND</p> <p>C) HAVE REAR GARDENS THAT RESPECT THE CHARACTER OF THE SURROUNDING AREA AND ENSURE THAT THE AMENITY AND PRIVACY OF OCCUPIERS OF EXISTING AND PROPOSED DWELLINGS IS SAFEGUARDED.</p> <p>IN OR ADJACENT TO TOWN CENTRES, IT MAY BE ACCEPTABLE TO PROVIDE FLATS WITH ONLY LIMITED EXTERNAL AMENITY SPACE. IN SUCH INSTANCES ALTERNATIVE PROVISION SUCH AS BALCONIES, ROOF GARDENS OR INTERNAL COMMUNAL AREAS WILL BE SOUGHT.</p> <p>4.31 Amenity space can form a 'visual' amenity setting for buildings and/or form a 'usable' amenity area in the form of gardens or private communal areas. New residential development should provide sufficient usable amenity space for residents. There should be a clear definition between private amenity space and public space. Wherever possible, private amenity space should be located to the rear of the property. Blocks of flats, particularly in and around town centre locations, require 'visual' amenity space in the form of a landscaped setting. Private balconies, roof gardens and internal communal areas can provide an effective form of private amenity space for people in flats. However, the siting and design of balconies should minimise any overlooking of neighbouring properties.</p> <p>4.33 The size and length of rear gardens <u>form and amount of useable amenity space that should be provided in new development</u> will depend on the character of the surrounding area and the configuration of the site. General levels of privacy in the immediate area will be taken into account. For example, it would be taken into consideration whether new dwellings would be backing onto open space, or surrounded by tightly constrained houses with small rear gardens. In considering rear garden areas and lengths <u>the form and amount of usable amenity space</u> the Council will not be seeking to ensure that they meet any minimum or maximum standard. Each case will be assessed, taking account of the general standard of amenity in the surrounding area. In some instances, new development may offer the opportunity to achieve an improvement in privacy standards of the surrounding area. The design, as well as the proximity, of developments can also affect adjoining gardens. Further guidelines will be included in Supplementary Planning Guidance.</p>	
D10: Rear Garden Interface	88	<p>D10 Rear Garden Interface Policy D10 and its reasoned justification to be deleted.</p>	Accept Inspector's recommendation

D13: Locally Listed Buildings	89	<p>Locally Listed Buildings</p> <p>D13 THE COUNCIL WILL ENCOURAGE THE RETENTION, MAINTENANCE, AND RESTORATION OF LOCALLY LISTED BUILDINGS AND SEEK THE PRESERVATION OF THEIR LOCAL HISTORIC OR ARCHITECTURAL INTEREST BY RESISTING APPLICATIONS FOR INAPPROPRIATE ALTERATIONS OR EXTENSIONS. WHERE DEMOLITION IS PROPOSED, IT SHOULD BE DEMONSTRATED THAT ALL REASONABLE MEANS OF PRESERVING THE BUILDING HAVE BEEN THOROUGHLY INVESTIGATED AND SHOWN TO BE UNREALISTIC.</p>	<p>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.</p>
D14 Locally Listed Buildings	89	<p>D14 Locally Listed Buildings</p> <p>Policy D14 and its reasoned justification to be deleted.</p>	<p>Accept Inspector's recommendation</p>
D15: The Use of Statutorily and Locally Listed Buildings	90	<p>The Use of Statutorily and Locally Listed Buildings</p> <p>D15 WHERE IT CAN BE CLEARLY DEMONSTRATED TO THE COUNCIL'S SATISFACTION THAT A CHANGE OF USE OF A STATUTORILY OR LOCALLY LISTED BUILDING IS REQUIRED TO PRESERVE THAT BUILDING, AND WHERE ALTERATIONS REQUIRED FOR THE NEW USE DO NOT DIMINISH THE ARCHITECTURAL OR HISTORIC VALUE OF THE BUILDING OR ITS SETTING, SUCH A PROPOSAL MAY BE CONSIDERED TO OVERRIDE OTHER PLAN POLICIES AND BUILDING CONTROL STANDARDS IN APPROPRIATE CASES.</p>	<p>Accept Inspector's recommendation</p>
D25: Lighting, Including Floodlighting	93	<p>D25 Lighting, Including Floodlighting</p> <p>Add new paragraph after 4.78</p> <p><u>In general, planning permission will be required for a lighting installation if it constitutes operational development involving some permanent physical change to land, or has a material effect on the external appearance of a building. Most forms of lighting on columns for example, for lighting outdoor sports events or for security purposes, will require permission. In addition, lighting installations on Listed Buildings that materially affect their character, or illumination of some types of outdoor advertisements, will also require consent under related legislation</u></p>	<p>Accept Inspectors recommendation</p>

<p>D26: Telecommunications Development</p>	<p>94</p>	<p>Telecommunications Development D26 PROPOSALS FOR TELECOMMUNICATIONS DEVELOPMENT WILL BE CONSIDERED FAVOURABLY PROVIDED:-</p> <p>A) NO SATISFACTORY ALTERNATIVE MEANS FOR TELECOMMUNICATIONS ARE AVAILABLE;</p> <p>A) NO SATISFACTORY ALTERNATIVE, AND LESS HARMFUL, MEANS OF MEETING THE NETWORK COVERAGE DEFICIENCY IDENTIFIED BY THE PROSPECTIVE OPERATOR IS AVAILABLE.</p> <p>B) CONSIDERATION HAS BEEN GIVEN TO SITING EQUIPMENT ON AN EXISTING BUILDING OR STRUCTURE OR TO SHARING FACILITIES (EITHER USING EXISTING FACILITIES OR REPLACING EXISTING FACILITIES WITH SHARED FACILITIES);</p> <p>C) THERE WOULD BE NO DETRIMENTAL IMPACT ON CONSERVATION AREAS, LISTED BUILDINGS, IMPORTANT LOCAL VIEWS AND LANDMARKS OR OTHER STRUCTURAL FEATURES IDENTIFIED IN POLICY SEP5, AND, HAVING REGARD TO OPERATIONAL NEED, THERE WOULD BE NO SERIOUS RISK TO AMENITY IN RESIDENTIAL AREAS;</p> <p>D) THE PROPOSED INSTALLATION WOULD BE SITED AND DESIGNED TO MINIMISE VISUAL IMPACT, AND, WHERE PRACTICABLE, TO ACCOMMODATE FUTURE SHARED USE. CAREFUL CONSIDERATION SHOULD BE GIVEN TO SCREENING AND PLANTING; AND</p> <p>E) THE PROPOSED SITE AND ANY EMISSIONS ASSOCIATED WITH IT DO NOT PRESENT ANY HEALTH HAZARDS.</p>	<p>Accept Inspector's recommendation, subject to minor correction by deletion of the words 'TO HIM' at the end of criterion A)</p>
<p>D32: Public Art and Design</p>	<p>95</p>	<p>D32 Public Art and Design THE COUNCIL WILL ENCOURAGE THE PROVISION OF PUBLIC WORKS OF ART IN ALL MAJOR COMMERCIAL DEVELOPMENT AND ADJACENT PUBLIC SPACES.</p> <p><u>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.</u></p>	<p>Accept Inspector's recommendation</p>

CHAPTER 5 – TRANSPORT

UDP Policy/Para No.	IR Ref.	Proposed Modification	Reason for Modification
Para 5.12: Transport Objectives	98	<p>TRANSPORT OBJECTIVES</p> <p>5.12 i) To help bring about a land use pattern where the necessity to travel, especially by car, is minimised, and where there is a realistic choice of mode of transport;</p> <p>i) <u>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.</u></p> <p>ii) To promote sustainable travel patterns by encouraging walking, cycling and the use of public transport by better maintenance and improvement of the provision made for these modes, and to promote safe and convenient interchange between different modes of transport;</p> <p>iii) To protect the environmental quality of the Borough from the impact of traffic; and</p> <p>v) To manage the highway network effectively for all users without increasing its overall capacity for private motorised vehicles, and creating further capacity where appropriate for priority use by sustainable transport modes.</p>	Accept Inspector's recommendation
T7: Designing New Development with Good Access in Mind	99	<p>T7 Designing New Development with Good Access in Mind</p> <p>Policy T7 and its reasoned justification to be deleted.</p>	Accept Inspector's recommendation
Para 5.21b: Rail Freight Transport	102	<p>5.21b Opportunities for new rail connections to industrial or warehousing premises in the Borough are, however, very limited. These will largely be along the West Coast Main Line, where there are currently industrial and warehousing premises. If these are redeveloped, developers will be encouraged to investigate the feasibility of including rail sidings and loading/unloading facilities. The appropriateness of these will, of course, be determined by the nature of the business to be undertaken in the new premises. Transhipment depots may be acceptable, but many of the roads in the vicinity of the railway line are not suitable for additional heavy goods vehicle movements. At transhipment depots goods are transferred from rail to lorry or vice-versa. Facilities are provided either to break a train-load into smaller consignments for onward transport by lorry, or for several lorry-loads to be consolidated into one train-load. <u>The Strategic Rail Authority, Network Rail and the relevant Train Operating Companies will be consulted on any proposal.</u></p>	Accept Inspector's recommendation, and amend to reflect changed circumstances.

T13 & Schedule 6: Parking Standards	110	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
T14 and para 5.32: New Development and On-Street Parking	112	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
T15: Making Better Use of Parking Provision	113	T15 Making Better Use of Parking Provision Policy T15 and its reasoned justification to be deleted.	Accept Inspector's recommendation
T17 and Para 5.37: Station Car Parks	114	T17 Station Car Parks Policy T17 and its reasoned justification to be deleted.	Accept Inspector's recommendation
T18 Servicing of New Developments	115	Servicing of New Developments T18 FOR ALL APPROPRIATE DEVELOPMENT, OFF-HIGHWAY SERVICE AREAS AND ACCESS ROADS SHOULD BE PROVIDED. 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. THEY SHOULD BE DESIGNED SO THAT THERE IS NO UNACCEPTABLE LOSS OF AMENITY TO SURROUNDING OCCUPIERS. DIRECT CONNECTION OF ACCESS ROADS OR SERVICE AREAS TO LONDON DISTRIBUTOR OR BOROUGH DISTRIBUTOR ROADS WILL BE DISCOURAGED, UNLESS CONNECTION TO A LOCAL ACCESS ROAD IS UNDESIRABLE DUE TO ROAD SAFETY OR AMENITY REASONS. IF CONNECTION TO A DISTRIBUTOR ROAD IS NECESSARY, APPROPRIATE HIGHWAY WORKS FINANCED BY THE DEVELOPER WILL BE REQUIRED TO MINIMISE THE DISRUPTION TO TRAFFIC, AND TO ENSURE ROAD SAFETY.	Accept Inspector's recommendation
T19: Servicing of New Developments	116	Servicing of New Developments T19 THE COUNCIL WILL REQUIRE THE PROVISION OR IMPROVEMENT OF SERVICE ROADS TO CURRENT ADOPTABLE STANDARDS IN CONNECTION WITH DEVELOPMENTS AS SHOWN ON THE PROPOSALS MAP AND ON PLANS IN SCHEDULE 7 AND WILL SEEK OTHERS WHERE APPROPRIATE.	Accept Inspector's recommendation

CHAPTER 6 – HOUSING

UDP Policy/Para No.	IR Ref:	Proposed Modification	Reason for Modification																																																																																																								
New Policy	118	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	Accept Inspector's recommendation																																																																																																								
Para 6.7		<p data-bbox="379 853 405 1760">SUPPLY OF NEW HOUSING- COMPLETIONS (JAN 1992 TO DEC 2002)</p> <table border="1" data-bbox="405 506 1102 1760"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">CONVERSIONS/CH. USE</th> <th colspan="2">NEW BUILD</th> <th colspan="2">TOTAL</th> </tr> <tr> <th>GROSS</th> <th>NET</th> <th>GROSS</th> <th>NET</th> <th>GROSS</th> <th>NET</th> </tr> </thead> <tbody> <tr><td>1992</td><td>25</td><td>16</td><td>340</td><td>289</td><td>365</td><td>305</td></tr> <tr><td>1993</td><td>9</td><td>1</td><td>230</td><td>211</td><td>239</td><td>212</td></tr> <tr><td>1994</td><td>34</td><td>-5</td><td>292</td><td>272</td><td>326</td><td>267</td></tr> <tr><td>1995</td><td>57</td><td>13</td><td>155</td><td>146</td><td>212</td><td>159</td></tr> <tr><td>1996</td><td>39</td><td>25</td><td>141</td><td>110</td><td>180</td><td>135</td></tr> <tr><td>1997</td><td>23</td><td>-2</td><td>185</td><td>172</td><td>208</td><td>170</td></tr> <tr><td>1998</td><td>102</td><td>69</td><td>239</td><td>212</td><td>341</td><td>281</td></tr> <tr><td>1999</td><td>64</td><td>43</td><td>83</td><td>57</td><td>147</td><td>100</td></tr> <tr><td>2000</td><td>31</td><td>17</td><td>60</td><td>22</td><td>91</td><td>39</td></tr> <tr><td><u>2001</u></td><td><u>136</u></td><td><u>112</u></td><td><u>365</u></td><td><u>354</u></td><td><u>501</u></td><td><u>466</u></td></tr> <tr><td><u>2002</u></td><td><u>61</u></td><td><u>37</u></td><td><u>346</u></td><td><u>316</u></td><td><u>407</u></td><td><u>353</u></td></tr> <tr><td>TOTAL</td><td>384</td><td>177</td><td>1725</td><td>1491</td><td>2109</td><td>1668</td></tr> <tr><td></td><td>581</td><td>326</td><td>2436</td><td>2161</td><td>3017</td><td>2487</td></tr> </tbody> </table> <p data-bbox="1142 394 1417 1760">6.7 The housing completion rates in the last five years have been variable (see table on page 135). Following an average completion rate of 461 between 1986-1990, the rate declined to an average of 264 306 (gross) between 1991-1995. In the period between 1996-2000 the average fell to 193 (gross). This, among other things, is an indication that the scope for increasing housing supply was very limited in Harrow under the policies then in force. In the period 1997-2001, a total of 1288 (gross) or 1056 (net) additional dwellings were completed, an annual average of 257 (gross) (210 net). However, in the last two years completions have averaged 454 (gross) per annum. The supply of additional housing has come largely from new build, which has accounted for nearly 90% over 80% of total completions between 1989 and 2000, but 78% in 2001-2. The remainder has been provided by a combination of conversion of houses into flats and changes of use of buildings.</p>		CONVERSIONS/CH. USE		NEW BUILD		TOTAL		GROSS	NET	GROSS	NET	GROSS	NET	1992	25	16	340	289	365	305	1993	9	1	230	211	239	212	1994	34	-5	292	272	326	267	1995	57	13	155	146	212	159	1996	39	25	141	110	180	135	1997	23	-2	185	172	208	170	1998	102	69	239	212	341	281	1999	64	43	83	57	147	100	2000	31	17	60	22	91	39	<u>2001</u>	<u>136</u>	<u>112</u>	<u>365</u>	<u>354</u>	<u>501</u>	<u>466</u>	<u>2002</u>	<u>61</u>	<u>37</u>	<u>346</u>	<u>316</u>	<u>407</u>	<u>353</u>	TOTAL	384	177	1725	1491	2109	1668		581	326	2436	2161	3017	2487	Updating of Information
	CONVERSIONS/CH. USE			NEW BUILD		TOTAL																																																																																																					
	GROSS	NET	GROSS	NET	GROSS	NET																																																																																																					
1992	25	16	340	289	365	305																																																																																																					
1993	9	1	230	211	239	212																																																																																																					
1994	34	-5	292	272	326	267																																																																																																					
1995	57	13	155	146	212	159																																																																																																					
1996	39	25	141	110	180	135																																																																																																					
1997	23	-2	185	172	208	170																																																																																																					
1998	102	69	239	212	341	281																																																																																																					
1999	64	43	83	57	147	100																																																																																																					
2000	31	17	60	22	91	39																																																																																																					
<u>2001</u>	<u>136</u>	<u>112</u>	<u>365</u>	<u>354</u>	<u>501</u>	<u>466</u>																																																																																																					
<u>2002</u>	<u>61</u>	<u>37</u>	<u>346</u>	<u>316</u>	<u>407</u>	<u>353</u>																																																																																																					
TOTAL	384	177	1725	1491	2109	1668																																																																																																					
	581	326	2436	2161	3017	2487																																																																																																					

Para 6.17: National Policy Context	120	<p>6.17 Circular 6/98 and PPG3 state that a community's need for affordable housing is a material planning consideration which may properly be taken into account in formulating development plan policies and deciding planning applications. Whilst the primary objective is to ensure that there is sufficient land for housing to meet agreed need in terms of numbers, the Circular reiterates the need to ensure that local authorities provide a mix of dwellings and encourage mixed and balanced communities to avoid social exclusion. The Circular encourages the development of policies that seek an element of affordable housing in new residential developments and the need to indicate how many affordable homes will be needed through the Plan period. Great emphasis is placed on securing on-site development of affordable housing in schemes which are required to have an element of affordable housing.</p>	Accept Inspector's recommendation
H4 and Para 6.27: Housing Provision on Previously-Developed Land	123	<p>H4 Housing Provision on Previously-Developed Land Policy H4 and its reasoned justification to be deleted.</p>	Accept Inspector's recommendation
H5: Residential Density	125	<p>Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.</p>	
H6: Affordable Housing and H7: Housing for Key Workers	131	<p>Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.</p>	
Para 6.47: Dwelling Mix	132	<p>6.47 PPG3 recognises the need to achieve a better balance between the range of dwellings and household types. Those living in Harrow have a range of housing needs which can only be met through the provision of a variety of housing types. It is therefore important that a variety of dwellings is provided, on larger development sites. This will ensure a range of accommodation appropriate to the needs of a balanced and mixed community. A mix of unit sizes is particularly needed in the Borough to help to respond to change in household composition and ensure flexibility and movement within the housing stock, both at present and in the future. Whilst the precise housing mix required is likely to alter during the Plan period, due to changes in the population structure and household composition, effective monitoring should ensure that the application of the policy responds to the most up-to-date situation. Where new housing development is to be provided on a site of one hectare or above, a reasonable mix and balance of house types and sizes will be required.</p>	Accept Inspector's recommendation
H10: Conversions of Houses and Other Buildings to Flats	134	<p>Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.</p>	

H13: Houses in Multiple Occupation	135	<p>Houses in Multiple Occupation</p> <p>H13 THE COUNCIL WILL ENCOURAGE THE RETENTION OF EXISTING HOUSES IN MULTIPLE OCCUPATION AND FAVOURABLY CONSIDER APPLICATIONS FOR THE CONVERSION OF BUILDINGS TO HOUSES IN MULTIPLE OCCUPATION, PROVIDING THAT:-</p> <p>A) THERE IS NO ADVERSE IMPACT ON ENVIRONMENTAL CONDITIONS OR ON THE AMENITY OF THE SURROUNDING AREA;</p> <p>B) THERE IS NO ADVERSE IMPACT ON TRAFFIC, HIGHWAY SAFETY AND PARKING;</p> <p>C) THE BUILDING AND ACCOMMODATION PROVIDED IS SUITABLE IN TERMS OF SIZE, LAYOUT AND LOCATION;AND</p> <p>D) THE LEVEL OF CONVERSIONS IN THE ROAD HAS NOT EXCEEDED 25%.</p>	Accept Inspector's recommendation
H16: Hostels	135	<p>Hostels</p> <p>H16 THE COUNCIL WILL FAVOURABLY CONSIDER PROPOSALS FOR PURPOSE-BUILT HOSTELS OR THE CONVERSION OF AN EXISTING BUILDING TO A HOSTEL USE PROVIDING:-</p> <p>A) THE PROPOSAL IS LOCATED IN OR NEAR TO THE METROPOLITAN OR DISTRICT CENTRES OR AREAS OF GOOD PUBLIC TRANSPORT ACCESSIBILITY; <u>AND</u></p> <p>B) THERE WILL BE NO HARMFUL CONCENTRATION OF SUCH USES OR UNACCEPTABLY ADVERSE ENVIRONMENTAL OR AMENITY PROBLEMS IN THE SURROUNDING AREAS;AND</p> <p>C) THERE IS ADEQUATE OFF-STREET PARKING.</p>	Accept inspector's recommendation
H19: Mobility and Lifetime Homes	136	<p>Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.</p>	

CHAPTER 7 – EMPLOYMENT, SHOPPING AND TOWN CENTRES

UDP Policy/Para No.	IR Ref:	Proposed Modification	Reason for Modification
National Policy Context - para 7.18	139	<p>7.18 PPG3 advises that, where allocations of land for employment uses cannot realistically be taken up in the quantities envisaged over the lifetime of the Plan, then these allocations should be reviewed, and possibly reallocated for housing or mixed-use development. The government resolve on this issue has been given a new impetus by the current proposal to make changes to PPG3 to make provision for releasing unused and under-used industrial and employment land for residential development. The presumption in favour of using industrial and commercial land for housing is aimed at removing barriers to delivering the housing needed in our communities and ensure that the planning system is not a brake on an adequate and continuing supply of sites for housing in sustainable locations. The greatest challenge for the Council is how to produce a policy framework that will secure more affordable housing as part of the timely delivery of agreed housing numbers without a negative effect on sustainability agenda in areas where there is significant imbalance in land allocation between housing and other uses. Whilst the Council would be sympathetic to planning proposals for housing or mixed-use development affecting land allocated for industrial or commercial use, it is expected that developers demonstrate through an up to date assessment that the land or buildings are surplus to requirements. The Council accepts that redundant industrial or commercial buildings that are no longer needed for such use should be allocated for housing or appropriate mixed use. Regular and up-to-date assessments of the need for land to be allocated for employment uses over the plan period will be required. A detailed review of the sustainability of particular sites for housing or other uses will also be carried out through development and planning briefs. Having reviewed the Borough's remaining sites in 1996, the Council believes that the remaining land available to be taken up is very small indeed, (see para 7.4, above) and therefore the advice in PPG3 does not apply in the context of Harrow. Further assessment of industrial and employment land would be required during the Plan period.</p>	Accept Inspector's recommendation
EM4: New Office Development Para 7.23	141	<p>New Office Development EM4 MAJOR NEW OFFICE DEVELOPMENT AND REDEVELOPMENT SHOULD BE LOCATED IN HARROW METROPOLITAN CENTRE AND NORTHOLT ROAD, SOUTH HARROW. ALL OTHER NEW OFFICE DEVELOPMENT AND REDEVELOPMENT SHOULD BE LOCATED IN THE METROPOLITAN DISTRICT AND LOCAL CENTRES OR IN LOCATIONS WHICH ARE HIGHLY ACCESSIBLE BY PUBLIC TRANSPORT. IN MAJOR OFFICE DEVELOPMENTS A SUBSIDIARY ELEMENT OF OTHER APPROPRIATE USES WILL BE ACCEPTABLE. IN MIXED USE DEVELOPMENTS IN TOWN CENTRE LOCATIONS AN OFFICE ELEMENT WILL BE ENCOURAGED.</p> <p>7.23 healthy and vibrant town centre depends on a mix of uses, but the main source of employment in the centres, especially in Harrow, will continue to be office based. The majority of Harrow's economically active population has jobs or skills that traditionally have been office-based. Harrow Metropolitan Centre will continue to be the main sources of employment in the Borough. However, a healthy and vibrant town centre depends on a mix of uses. Even with changing working practices, the demand for officespace in the future, particularly in the financial and professional services which typify Harrow's office market, is not likely to be so severely curtailed as that to justify no further planned growth for office space. should be planned. Furnishing opportunities for Harrow people to</p>	Accept Inspector's recommendation

work in the Borough assists in achieving the sustainability aim of reducing distances travelled to work. This aim is more sustainable, and more supportive of social inclusion, if the local work journey is made, and it can conveniently be made, by a non-car mode of travel, such as public transport, walking or cycling.

Para 7.24

7.24 The Council will encourage diversification of uses in the town centres as a whole whilst recognising and supporting the shopping function of the primary shopping area. Diversity of uses in the Borough town centres and their accessibility to people living and working in the area make an important contribution to their vitality and viability. A reasonable range of available office premises is required in order to encourage enterprise. ~~In order to encourage enterprise, a reasonable range of available office premises is required.~~ This will help to support new enterprise, which typically will require small low cost suites, right through to those companies expanding their operations, and wanting rather larger, perhaps purpose built, single user buildings. A wider mix of uses that fits better with the surrounding community and the retail patterns of the Borough town centres will encouraged.

Para 7.26

~~7.26 Mixed uses, such as offices, retail, leisure or housing in the same development, or even in the same building, are important in town centres, because the occupiers can mutually support each other. In particular, security for office premises can be enhanced if there are other occupiers in the building and environs outside office hours. Encouraging a variety of uses also helps to create opportunities for generating a diverse range of new jobs. However, in order to allow for sufficient office floorspace to meet forecast demands, it is important that in major developments and redevelopments non-office uses are not allowed to predominate. A major new office development is defined as one being 2000m² or more total gross floor area. Therefore in Harrow Metropolitan Centre, and Northolt Road, South Harrow, the non-office element of any scheme should not exceed as a guideline, around 10% of gross floorspace of the scheme. Other town centres in the Borough have traditionally catered for small office suites, and these can more flexibly be accommodated in developments containing other uses, with these other uses possibly predominating.~~

Reasoned justification paragraph 7.25 remains unchanged.

EM5: New Large Scale Retail and Leisure Development

144

New Large Scale Retail, Leisure and other Developments

EM5 PROPOSALS FOR NEW RETAIL, LEISURE DEVELOPMENT AND OTHER INVOLVING LARGE SCALE USES ATTRACTING CONSIDERABLE NUMBERS OF PEOPLE, OR MAJOR EXTENSIONS TO EXISTING DEVELOPMENTS, SHOULD BE LOCATED WILL BE PREFERRED IN METROPOLITAN AND DISTRICT CENTRES. APPLICATIONS FOR PLANNING PERMISSION WILL BE CONSIDERED IN ACCORDANCE WITH A SEQUENTIAL APPROACH. IF A SUITABLE SITE IS NOT AVAILABLE IN THESE CENTRES, THEN AN EDGE-OF-CENTRE OR LOCAL CENTRE SITE MAY BE ACCEPTABLE ONLY IF THERE ARE NO SUITABLE SITES AVAILABLE IN THESE LOCATIONS. MAY OUT-OF-CENTRE SITES BE CONSIDERED. ALL EDGE-OF-CENTRE OR OUT-OF-CENTRE PROPOSALS OF 500 SQUARE METRES GROSS FLOORSPACE OR OVER WILL ALSO BE REQUIRED TO MEET THE FOLLOWING TESTS. THE ORDER OF PREFERENCE FOR THE LOCATION OF DEVELOPMENT SHOULD BE AS FOLLOWS:

~~A) PROPOSALS FOR FUTURE INVESTMENT AND REGENERATION WITHIN THE TOWN CENTRE WOULD NOT BE SERIOUSLY PREJUDICED;~~

~~B) THERE WOULD NOT BE ANY SERIOUS EFFECT ON THE VITALITY AND VIABILITY OF A TOWN CENTRE, ITS QUALITY AND ATTRACTIVENESS, ITS ROLE IN THE ECONOMIC AND SOCIAL LIFE OF THE COMMUNITY, THE RANGE OF SERVICES PROVIDED, THE PHYSICAL CONDITION OF THE TOWN CENTRE, OR THE LIKELY INCREASE IN THE NUMBER OF VACANT UNITS IN THE PRIMARY FRONTAGE;~~

~~C) THE PROPOSAL WOULD BE LOCATED AND DESIGNED SO AS TO REDUCE THE NEED TO ACCESS IT BY CAR, WOULD BE EASILY ACCESSIBLE BY CYCLISTS, PEDESTRIANS AND THOSE USING PUBLIC TRANSPORT, AND WOULD MAXIMISE OPPORTUNITIES FOR MAKING VISITS TO OTHER FACILITIES IN THE SAME TRIP.~~

~~FOR SCHEMES WHICH CONTAIN 500M² OR MORE GROSS FLOORSPACE OR ATTRACT LARGE NUMBERS OF PEOPLE, DEVELOPERS WILL BE REQUIRED TO SUBMIT AN IMPACT ANALYSIS. FOR SCHEMES OUTSIDE TOWN CENTRES OR THOSE NOT ALLOCATED AS A PROPOSAL SITE IN THIS PLAN DEVELOPERS WILL ADDITIONALLY BE REQUIRED TO SUBMIT AN ASSESSMENT OF THE NEED FOR THE DEVELOPMENT AND A SEQUENTIAL ANALYSIS OF ALTERNATIVE SITES.~~

A) SITES IN METROPOLITAN AND DISTRICT CENTRES

B) AN EDGE-OF-CENTRE OR LOCAL CENTRE SITE

IN CONSIDERING PROPOSALS TO DEVELOP EDGE OF CENTRE OR OUT OF CENTRE LOCATIONS, THE DEVELOPER MUST DEMONSTRATE THAT:

A) THERE IS A NEED FOR THE DEVELOPMENT AND ALL OTHER SEQUENTIAL PREFERABLE OPTIONS ARE INAPPROPRIATE;

B) THE VITALITY AND VIABILITY OF EXISTING CENTRES WOULD NOT BE COMPROMISED;

Accept Inspector's recommendation

Para 7.27	<p>7.27 The Council's primary concern is to enhance the vitality and viability existing town centres by focussing on retail and leisure and other key town centre uses which attract a lot of people within those centres. Government guidance stresses the importance of maintaining existing town centres and avoiding major out of centre development that could threaten their vitality and viability. as the main focus for investment. Shopping, office, retail and a wide variety of other uses can all be provided in a location well served by public transport. Policy SEM2 reiterates this view. Two of the Council's goals are: the encouragement of complementary uses of an appropriate size and layout in the town centres; and resisting development prejudicial to the health of the town centres.</p>
Para 7.27A	<p>7.27A <u>The principle of a sequential approach applies to both retail and other major development such as leisure and the Council considers it appropriate to fully explore the development potential of town centres for these uses. Where a need has been established developers will be required to demonstrate that all potential town centre options have been thoroughly accessed before considering other locations. Developers should first consider town centre sites followed by edge of centre and only then out of centre sites in locations that are accessible by a choice of means of transport. In line with PPG6 the Council favours an approach in which a developer, in search for a site, would commence by looking at Harrow Metropolitan Centre and all other centres before considering less central locations.</u></p>
Para 7.28	<p>7.28 The Council recognises that each town centre is unique, with different strengths, weaknesses and functions. Therefore, the Council will formulate Town Centre Strategies for those centres which require a clear statement of how competitiveness can be maintained, or in some cases, how the centre can be regenerated. Building on the successful partnership already in place between businesses in Harrow and Wealdstone town centres the strategies may be produced jointly with the private sector, where possible. Such these strategies, as well as setting out aims and objectives, may also contain specific proposals, all within the framework set out in this Plan. Many of these will be too detailed to include in the UDP (such as town centre management measures) but some will involve specific sites, and in order to establish them within a land use framework these are set out in the list of Proposal Sites in Chapter 10.</p>
Para 7.29	<p>7.29 The strategies will be produced jointly where possible with the private sector, building on the successful partnership already in place between businesses in Harrow and Wealdstone town centres, the Town Centre Manager, and the Council. Their progress will be monitored regularly and updated as appropriate. The thrust of the strategies will be to allow for the consolidation of the centres. The strategies will assist them to remain competitive against neighbouring centres by means of qualitative improvements, replacement of outworn buildings and infrastructure, and, in some cases, modest growth in the quantity of retail provision of other complementary uses.</p>
Para 7.30	<p>7.30 PPG6 sets out a number of tests for new developments which may have an impact on nearby town centres, if they are located out of centre. District Centres, Local Centres and local parades are particularly vulnerable. The likely impact of the development on a whole range of indicators of the vitality and viability of existing town centres should be considered. as set out in tests A) and B) of this Policy. For major proposals, the ones will be on the developer should demonstrate that there is need and that no significant harm will not be suffered by nearby town centres with reference to the indicators above. Smaller proposals will be encouraged to locate in District or Local Centres as appropriate. The Council acknowledges that the shopping hierarchy should not be unbalanced by permitting development of inappropriate character or which would attract custom from too wide catchments of other</p>

<p>Para 7.31</p>		<p>centres. Applications for major developments should be accompanied by transport, environmental as well as economic impact assessment studies.</p> <p>7.31 Town centres are the best locations for ensuring good access by public transport, and the Council is working to improve access for cyclists and pedestrians, too. New developments must have good access by modes other than the car. In line with Government guidance, securing public transport and highway improvements will be the subject of planning conditions, if the traffic generated by the scheme warrants these. For large schemes, the Council will expect the developer to demonstrate the means by which the number of people travelling by foot, cycle or public transport to and from the proposal can be maximised. This should be achieved both by measures designed into the proposal from the outset (e.g. parking provision in line with the Council's standards; access by foot, cycle and public transport deliberately designed to be more convenient than that by car; enhanced bus service provision, if appropriate etc.) and by operational means (such as implementing a Travel Plan, etc.) (see also Policies T5, T6, T8, T9, in Chapter 5 and Policy EP25 in Chapter 3).</p>	
<p>EM13: New Technology Industries</p>	<p>144</p>	<p>7.32 The Government (Parliamentary Ministerial statements) have made it clear that for retail or leisure proposals which are not in accordance with the Development Plan, or where the need for the type of development is not established in the Plan, developers must demonstrate the need for additional facilities on the edge of centre, or outside, town centres and provide an indication that the sequential approach has been applied. This requirement applies to extensions to existing developments as well. Whilst minor extensions or developments may not have a significant impact on the viability and vitality of nearby town centres, all those proposals which are of more than 500m² gross floorspace area or would attract large numbers of people, must include a demonstration of the need for the development if the proposal is outside a town centre, on the edge of or on sites is not allocated as a proposal site in the Plan. Need should not just be defined in terms of the physical capacity for the proposal, or the demand for it (often based on the available expenditure within a proposal's catchment area). Other types of need that might be relevant include: the need to maintain a balance of land uses in the Borough; the need to encourage vitality, viability and investment in existing town centres; the need to bring about regeneration in some of the town centres, such as Wealdstone and the need to ensure continuing investment by existing traders in these centres. This list is not exhaustive – other types of need could be material considerations. An explanation of how the sequential test has been applied, including the sites and centres considered, should also be included with the proposal, together with an analysis of the impact on the vitality and viability of surrounding centres. In line with PPG6, the Council has identified the need for some additional retail and leisure floorspace in town centre and edge of centre sites which are identified as Proposals Sites.</p> <p>EM13 New Technology Industries Policy EM13 and its reasoned justification to be deleted.</p>	<p>Accept Inspector's recommendation</p>

<p>EM14: Business Use - Designated Area: BAE Systems site</p>	<p>149</p>	<p>EM14 THE COUNCIL WILL RESIST THE LOSS OF LAND AND BUILDINGS WITHIN THE FOLLOWING BUSINESS USE AREAS, AS DEFINED ON THE PROPOSALS MAP, FROM BUSINESS AND LIGHT INDUSTRIAL (B1) USES:-</p> <p>ARCHES 9-17 AND 62-73, RAILWAY ARCHES, SOUTH HARROW;</p> <p>BRITISH RAIL GOODS YARD, CECIL ROAD, WEALDSTONE;*</p> <p>BAE SYSTEMS, WARREN LANE, STANMORE;</p> <p>BALLARDS MEWS, HIGH STREET, EDGWARE;</p> <p>SPRING VILLA PARK, OFF HIGH STREET, EDGWARE;</p> <p>18-30, 47-61, MASONS AVENUE AND 2-22, HERGA ROAD, WEALDSTONE;*</p> <p>NORTHOLT ROAD, SOUTH HARROW (NORTH OF SOUTH HARROW STATION).</p> <p>WHERE BUILDINGS ARE NOT CURRENTLY IN B1 USE, THE COUNCIL WILL ENCOURAGE REDEVELOPMENT FOR THAT PURPOSE.</p> <p>THOSE SITES MARKED ABOVE WITH AN ASTERISK (*) ARE PART OF THE WEALDSTONE PREFERRED INDUSTRIAL LOCATION AS DEFINED BY THE LONDON PLANNING ADVISORY COMMITTEE/GREATER LONDON AUTHORITY. THOSE INDUSTRIAL AREAS LISTED ABOVE OUTSIDE THESE STRATEGIC DESIGNATIONS ARE OF BOROUGH SIGNIFICANCE, AND WILL BE PROTECTED EQUALLY FROM LOSS TO OTHER USES.</p>	<p>Accept Inspector's recommendation</p>
<p>EM17: Change of Use of Shops – Primary Shopping Frontages</p>	<p>150</p>	<p>Change of Use of Shops – Primary Shopping Frontages</p> <p>EM17 IN THE PRIMARY SHOPPING FRONTAGE OF HARROW METROPOLITAN CENTRE AND OF THE DISTRICT CENTRES, THE CHANGE OF USE OF SHOPS (CLASS A1) TO (PROFESSIONAL AND FINANCIAL SERVICES) (CLASS A2) OR (FOOD AND DRINK) (CLASS A3) WILL NORMALLY BE PERMITTED PROVIDED THAT:-</p> <p>A) THE PROPOSED USE PROVIDES A SERVICE THAT IS DIRECTLY RELATED TO A SHOPPING TRIP AND SUPPORTS THE RETAIL FUNCTION OF THE CENTRE;</p> <p>B) THE LENGTH OF THE PRIMARY FRONTAGE IN NON-RETAIL USE AT STREET LEVEL IN THE CENTRE (INCLUDING ANY OUTSTANDING PERMISSIONS) WOULD NOT EXCEED 15% OF THE TOTAL IN HARROW METROPOLITAN CENTRE AND 25% OF THE TOTAL IN THE DISTRICT CENTRES;</p> <p>C) A HARMFUL CONCENTRATION OF NON-RETAIL USES IS NOT CREATED OR ADDED TO;</p>	<p>Accept Inspector's recommendation</p>

		<p>D) PARKING IS PROVIDED IN ACCORDANCE WITH THE COUNCIL'S STANDARDS;</p> <p>D) E) THE PREMISES CAN BE ADEQUATELY SERVICED WITHOUT CAUSING HARM TO HIGHWAY SAFETY AND CONVENIENCE; AND</p> <p>E) F) A WINDOW DISPLAY OR OTHER FRONTAGE APPROPRIATE TO THE SHOPPING AREA IS MAINTAINED.</p> <p>NON CLASS A USES WILL NOT BE PERMITTED IN PRIMARY FRONTAGES.</p>	<p>Accept Inspector's recommendation</p>
<p>EM18: Change of Use of Shops- Secondary Shopping Frontages and Local Centres</p>	<p>151</p>	<p>Change of Use of Shops – Secondary Shopping Frontages</p> <p>EM18 IN THE SECONDARY SHOPPING FRONTAGES OF HARROW METROPOLITAN CENTRE AND OF THE DISTRICT CENTRES, THE CHANGE OF USE OF RETAIL SHOPS (CLASS A1) TO NON-RETAIL USES WILL NORMALLY BE PERMITTED PROVIDED THAT:-</p> <p>A) THE USE IS APPROPRIATE TO A TOWN CENTRE;</p> <p>B) THE USE IS PRIMARILY FOR VISITING MEMBERS OF THE PUBLIC;</p> <p>C) THE USE REQUIRES AN ACCESSIBLE LOCATION;</p> <p>D) THE LENGTH OF THE SECONDARY FRONTAGE IN NON-RETAIL USE AT STREET LEVEL IN THE CENTRE (INCLUDING ANY OUTSTANDING PERMISSIONS) WOULD NOT EXCEED 50% OF THE TOTAL;</p> <p>E) PARKING IS PROVIDED IN ACCORDANCE WITH THE COUNCIL'S STANDARDS;</p> <p>E) F) THE PREMISES CAN BE ADEQUATELY SERVICED WITHOUT CAUSING HARM TO HIGHWAY SAFETY AND CONVENIENCE;</p> <p>F) G) A WINDOW DISPLAY OR OTHER FRONTAGE APPROPRIATE TO THE SHOPPING AREA IS MAINTAINED; AND</p> <p>G) H) A HARMFUL CONCENTRATION OF NON-RETAIL USES IS NOT CREATED OR ADDED TO.</p> <p>IN INSTANCES WHERE THE LONG TERM VACANCY RATE OF THE SECONDARY FRONTAGE OF THE CENTRE EXCEEDS 10%, THE COUNCIL WILL NORMALLY ALLOW ANY TOWN CENTRE USE, SUBJECT TO CRITERIA D) – <u>G</u>) ABOVE.</p>	

EM19: Change of Use of Shops- Designated Shopping Frontages of Local Centres	151	<p>Change of Use of Shops – Designated Shopping Frontages of Local Centres EM19 IN THE DESIGNATED FRONTAGE OF LOCAL CENTRES, THE COUNCIL WILL NORMALLY PERMIT ONLY RETAIL SHOPS (CLASS A1) AT GROUND FLOOR LEVEL. EXCEPTIONS MAY BE MADE IF THE FOLLOWING CRITERIA ARE MET:-</p> <p>A) THE PROPOSED USE IS APPROPRIATE TO THE CENTRE AND WILL IMPROVE THE RANGE OF SERVICES AVAILABLE TO LOCAL RESIDENTS AND VISITING MEMBERS OF THE PUBLIC TO HELP MEET THEIR DAY TO DAY NEEDS;</p> <p>B) THE LENGTH OF FRONTAGE IN NON-RETAIL USE AT STREET LEVEL IN THE CENTRE (INCLUDING ANY OUTSTANDING PERMISSIONS) WOULD NOT EXCEED 30% OF THE TOTAL DESIGNATED FRONTAGE OF THAT CENTRE;</p> <p>C) PARKING IS PROVIDED IN ACCORDANCE WITH THE COUNCIL'S STANDARDS;</p> <p>C) D) THE PREMISES CAN BE ADEQUATELY SERVICED WITHOUT CAUSING HARM TO HIGHWAY SAFETY AND CONVENIENCE; AND</p> <p>D) E) A WINDOW DISPLAY OR OTHER FRONTAGE APPROPRIATE TO THE SHOPPING AREA IS MAINTAINED; AND</p> <p>E) F) A HARMFUL CONCENTRATION OF NON-RETAIL USES IS NOT CREATED OR ADDED TO.</p> <p>IN INSTANCES WHERE THE LONG TERM VACANCY RATE OF THE LOCAL CENTRE FRONTAGE EXCEEDS 10%, THE COUNCIL WILL NORMALLY ALLOW ANY TOWN CENTRE USE, PROVIDED THAT THE TOTAL PROPORTION OF NON-RETAIL FRONTAGE DOES NOT EXCEED 50%, AND SUBJECT TO CRITERIA C) – E) ABOVE.</p>	Accept Inspector's recommendation
EM20: Change of Use of Shops in Non- Designated Parades	152	<p>Change of Use of Shops in Non - Designated Parades EM20 THE COUNCIL WILL NORMALLY PERMIT CHANGES OF USE FROM RETAIL SHOPS (A1) IN NON-DESIGNATED PARADES OF HARROW METROPOLITAN CENTRE, THE DISTRICT CENTRES AND LOCAL CENTRES, PROVIDED THAT:-</p> <p>A) THE USE IS APPROPRIATE TO A TOWN CENTRE; <u>AND</u></p> <p>B) PARKING IS PROVIDED IN ACCORDANCE WITH THE COUNCIL'S STANDARDS;</p> <p>B) THE PREMISES CAN BE ADEQUATELY SERVICED WITHOUT CAUSING HARM TO HIGHWAY SAFETY AND CONVENIENCE.</p>	Accept Inspector's recommendation

CHAPTER 8 – RECREATION, LEISURE AND TOURISM

UDP Policy/Para No.	I R Ref:	Proposed Modification	Reason for Modification
R5 and Para 8.28: Outdoor Sports Facilities	155	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
R12: Protecting Arts, Culture, Entertainment and Leisure Facilities	157	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
R14 and paras 8.49 and 8.50: Libraries	158	R14 Libraries Policy R14 and reasoned justification to be deleted.	Accept Inspector's recommendation
Para 8.60	159	8.60 Opportunities to increase the supply of hotels may arise through redevelopment or change of use. Development involving a change of use and/or redevelopment of dwellings to provide hotels and guest houses can significantly alter the character of an area, through introducing a commercial use into a residential area: visually, through provision and siting of nameboards and large hard surfaced areas; socially, by attracting a transient population; and environmentally, through increased traffic. Outside town centres, only sites alongside London Distributor Roads will be considered suitable. There may be exceptions to this in non-residential locations well served by public transport. Further guidance on conversion or redevelopment of dwellings can be found in Chapter 6 Housing.	Accept Inspector's recommendation

CHAPTER 9 – COMMUNITY SERVICES AND ACCESSIBILITY

UDP Policy/Para No.	I R Ref:	Proposed Modification	Reason for Modification
C2 (C18 in FDD): Provision of Social and Community Facilities	161	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
C7 (C6 in FDD): High Schools and Tertiary Colleges	164	C7 High Schools and Tertiary Colleges Policy C7 and its reasoned justification to be deleted.	Accept Inspector's recommendation
C8 (C7 in FDD): Harrow College	165	C8 Harrow College Policy C8 and its reasoned justification to be deleted.	Accept Inspector's recommendation
C9 (C8 in FDD): Dual Use of School Facilities and Playing Fields	165	C9 Dual Use of School Facilities and Playing Fields Policy C9 and its reasoned justification to be deleted.	Accept Inspector's recommendation
C10 (C9 in FDD): Extensions to School Premises	166	C10 Extensions to School Premises Policy C10 and its reasoned justification to be deleted.	Accept Inspector's recommendation

C11 (C10 in FDD): New Education Facilities	167	<p>C11 New Education Facilities THE COUNCIL WILL SEEK TO ENSURE THAT APPROPRIATE EDUCATION FACILITIES ARE PROVIDED. IN CONSIDERING PROPOSALS FOR NEW SCHOOLS OR THE EXPANSION OF EXISTING ONES, THE FOLLOWING CRITERIA WILL BE TAKEN INTO ACCOUNT:</p> <p>A) THE LOCAL POPULATION AND THE NEED FOR NEW EDUCATION FACILITIES IN THE AREA;</p> <p>B) ADEQUATE PROVISION FOR CAR PARKING;</p> <p><u>BG) ACCESSIBILITY OF THE SITE WITH REGARD TO ITS CATCHMENT AREA AND TO PUBLIC TRANSPORT, PAYING PARTICULAR REGARD TO ENSURING THAT THE SITE IS READILY ACCESSIBLE BY NON-CAR MODES AND INTEGRATED INTO THE SURROUNDING AREA; AND</u></p> <p><u>CB) THE AVAILABILITY OF SAFE SETTING-DOWN AND PICKING-UP POINTS WITHIN THE SCHOOL SITE.</u></p>	Accept Inspector's recommendation
C20 (C19 in FDD): Access to Buildings and Public Spaces	169	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	

CHAPTER 10 – IMPLEMENTATION, RESOURCES AND MONITORING

UDP Policy/Para No.	I R Ref:	Proposed Modification	Reason for Modification
14: Planning Obligations – Residential Development and School Accommodation	175	I4 Planning Obligations – Residential Development and School Accommodation Policy 14 and its reasoned justification to be deleted.	Accept Inspector's recommendation

PROPOSAL SITES

UDP Policy/Para No.	I R Ref.	Proposed Modification	Reason for Modification
PS 6: Harrow-on-the-Hill Station, and adjoining land	184	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
New Proposal Site-BAE Systems, Warren Lane, Stanmore	149	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
PS7: Land north of Junction Road	184	This is a very prominent site on the western edge of the town centre but is constrained by the adjoining elevated section of the Roxborough Bridge flyover. A substantial building, to a very high design standard, would be appropriate at this gateway location, reflecting the scale of adjacent buildings and its relationship to the flyover. The site has good public transport accessibility and restraint based parking would apply.	Accept Inspector's recommendation
PS15: Roch Avenue Allotments, Roch Avenue, Tenby Road, Edgware	186	PS15: Roch Avenue, Allotments, Roch Avenue, Tenby Road, Edgware Delete site from proposal site schedule and proposals map.	Accept Inspector's recommendation
PS17: Former Harrow Hospital, and nurses hostel, Roxeth Hill	187	<p>The Harrow Hospital site lies within the Roxeth Hill Conservation Area and Area of Special Character, and is accessed from Roxeth Hill, a borough distributor road. The main hospital building is Grade II listed and the site is adjoined to the west by the Grade II listed Christ Church and to the east by Siddons House, a locally listed building. The main hospital building is also included on the English Heritage Register of Buildings at Risk in Greater London. The former nurses hostel is located some 55m west of the hospital site.</p> <p>There would be a strong presumption against the demolition of the main part of the hospital, and any other buildings that make a positive contribution to the Conservation Area. Conversion of retained buildings to residential use is similar to residential uses would be appropriate. Residential infill over the remainder of the site may be acceptable but would require careful design to take account of the amenities of adjoining properties, especially to the south and east, and the location of the site on the lower slope of Harrow on the Hill. Vehicular access to Roxeth Hill presents a particular constraint. This is likely to affect developments which would result in significant peak-time traffic generation. The aim should be for an imaginative scheme achieving high density provision whilst suitably recognising the prevailing constraints and design implications of all these factors.</p>	<p>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</p>

		<p>The Council has endorsed a Planning Brief for the site prepared on behalf of the Harrow and Hillingdon Healthcare NHS Trust.</p>	<p>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.</p>
<p>PS18: Former Kings Head Hotel, High Street, Harrow on the Hill</p>	<p>188</p>	<p>The Kings Head Hotel is a Grade II listed building, and an architecturally and historically important site at Harrow on the Hill. The Kings Head is also included on the English Heritage Register of Buildings at Risk in Greater London. Development will be guided by a set of principles for the redevelopment and refurbishment of the site, approved in October 1997 by the Development and Planning Committee.</p> <p>The Council's first preference for the site would be for a development of a viable hotel. Should the development of an hotel not be viable, then the Council will consider as an alternative scheme based on the following principles:</p> <ol style="list-style-type: none"> <u>The conversion of the most historic parts of the building for residential and A3 use (subject to viability/sustainability issues being addressed).</u> <u>The demolition of Assembly Rooms as part of a comprehensive scheme.</u> <u>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.</u> <p>Conversion of the most historic parts of the building for residential and A3 use, together with the replacement of the Assembly Rooms, garage block and other parts of the building which are of no special interest with purpose built housing could also be acceptable, in conjunction with the refurbishment and repair of the listed building. The retention of the majority of the hotel gardens in the north east part of the site would provide adequate amenity space for any new residential units. Residential parking should be provided on site and methods of providing adequate parking for any A3 use should be investigated. Any new building or hard surfacing should take account of existing trees covered by Tree Preservation Orders.</p> <p>This is a key site in the context of Harrow on the Hill. Comprehensive development is required to ensure that the special historic interest of the former hotel, and all land within its curtilage, is preserved. If necessary, the Council will consider using its compulsory purchase powers to ensure that this is achieved. Before any scheme is considered there should be a thorough site evaluation, including a detailed historic buildings survey.</p>	<p>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 residential</p>

			development of the site, and can now be deleted from the plan. The qualification to paragraph 1 recommended by the Inspector is unnecessary.
PS23: Rayners Lane	189	PS23: Rayners Lane Removal from the proposals map the open space designations for land at Drinkwater Road/Swifts Close and at Thackney Close.	Accept Inspector's recommendation
PS 29: Land at Stanmore Station and adjacent land, London Road	190	This narrow site includes the station buildings, car park and the airspace over the railway. Housing adjoins to the east, although there is a significant difference in site levels, and part of the site is of nature conservation interest. Any proposal must protect the residential amenity of nearby properties and address the needs of cyclists. The current station car park would need to be retained at its present capacity in any redevelopment. 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.	Accept Inspector's recommendation

SCHEDULES

UDP Policy/Para No.	I R Ref.	Proposed Modification	Reason for Modification
Schedule 1	194	Add definition of 'Regeneration' Delete definition of 'Affordable Housing', but include cross reference to the definition in the reasoned justification to new Policy H6.	Accept Inspector's recommendation
Schedule 6	110	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	
Schedule 8	134	Subject to detailed consideration in another report to the Panel on 5 January 2004. Information in this schedule will be updated to reflect the Panel's Decisions.	

This page is intentionally left blank

Meeting:	Unitary Development Plan Panel
Date:	Monday 5 th January 2004
Subject:	Replacement Harrow Unitary Development Plan – Statement of Decisions on 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:	Public
Ward:	All
Enclosures:	Appendix A - Schedule of Council Decisions on the Inspector's Recommendations

1. **Summary**

- 1.1 The Panel at its meeting on 12th November 2003 considered a report on the proposed Council response to each of the Inspector’s recommendations. Reflecting the decisions reached by the Panel at that meeting, and the preparation of Proposed Modifications to the Plan (see report elsewhere on the agenda), various amendments have been made to the draft Statement of Decisions. In addition, a suggested response is now included in response to the Inspector’s recommendations on Policies C10 and C15. If the Panel agree the suggested responses now 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 Cabinet.)

- 2.1 **To agree the Council’s Statement of Decisions on the Recommendations contained in the Inspector’s Report, and for the Statement to be placed on deposit alongside the Proposed Modifications to the Replacement HUDP.**

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 was 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.

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 Following the Panel's decisions on the draft Statement of Decisions considered at its meeting on 12th November 2003, and following the preparation of revised policies and reasoned justifications in response to various recommendations made by the Inspector, further changes have been made to the following Council responses:-

- 1) SD1: Quality of Design (Page 4 of Appendix A)
- 2) SH1 & Paras2.82-2.83: Housing Provision and Need (Page 6 of Appendix A)
- 3) T15: Making Better Use of Parking Provision (Page 26 of Appendix A)
- 4) H5: Residential Density (Page 28 of Appendix A)
- 5) H6: Affordable Housing and H7: Housing for Key Workers (Page 28 in Appendix A)
- 6) H19: Mobility and Lifetime Homes (Page 30 of Appendix A)
- 7) C2 (C18 in First Deposit Draft): Provision of Social and Community Facilities (Page 36 of Appendix A)
- 8) C20 (C19 in First Deposit Draft): Access to Buildings and Public Spaces (Page 38 of Appendix A)
- 9) PS7: Land North of Junction Road (Page 42 of Appendix A)
- 10)PS17: Former Harrow Hospital, & nurses hostel, Roxeth Hill (Page 43 of Appendix A)
- 11)PS18: Former Kings Head Hotel, High Street, Harrow on the Hill (Page 43 of Appendix A)

In addition to the above, a suggested response to the Inspector's recommendations in respect of Policies C10 (Page 38 of Appendix A) and C15 (Page 39 of Appendix A) were erroneously omitted from the last report. These are now also included for the Panel's consideration.

6.2 The Panel is now invited to 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 The Council's Statement of Decisions, together with the Proposed Modifications to the Plan, will need to be placed on deposit after approval by Cabinet.

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. 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 has been paid to the need for the Replacement HUDP to be in general conformity with the London Plan, and the suggested responses in Appendix A reflect these considerations. Accordingly, Counsel's opinion has been sought on the precise wording of appropriate revised policies and reasoned justifications, and where appropriate, has informed revised wording in this Statement.

11. **Background Papers**

11.1 UDPAP Report – 12 November 2003 – Consideration of Inspector's Report on the Public Local Inquiry

12. **Author**

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

This page is intentionally left blank

CHAPTER 1 – WHOLE PLAN AND INTRODUCTION

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 090/1122 Tesco Stores Ltd	14	I recommend no modification to the Plan.	Accepted	No modification required.
General - define "sustainable" or 'sustainability'	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.

SEP5 and Para 2.55: Structural Features (and PIC05)	007/0727 Harrow Nature Conservation Forum 007/0031R Harrow Nature Conservation Forum	27	I recommend the Plan be modified by the substitution for Policy SEP5, para O of the following:- “O) SSSI’s and other sites of nature conservation importance, namely the Countryside Conservation Area, sites of local and metropolitan importance and sites pending such designation”	Accepted	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.
SD1: Quality of Design	065/0587 Peter D Kyte Associates 028/0760 G Gitter 121/1289 BT plc	28	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”.	Accepted in part	The recommended modification is inconsistent with the Government’s stated aim to promote higher standards of urban design. It would do little to improve the quality of new development or provide adequate guidance for Development Control. It is accepted that compliance with all the tests set out in the policy would impose too rigorous a design standard. An alternative, seeking high quality design in all new development, would be more consistent with PPG1 and PPG12.
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 MrJCarpenter (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 Moorhouse 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 101/1172 Guys Newsagents 102/1176 Mr T Selvarajah 103/1180 Mr, Mrs & Mstr Marcampillai 104/1184 M C Clapinson	33	I recommend no modification to the Plan	Accepted	No modification required

ST3 London-Wide Highway Network (Cont)	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 modifications will assist in clarifying the policy. In addressing the Inspector’s recommendation, however, it will be necessary to amend the housing provision figure in SH1B), which the Inspector did not amend.

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 consultations ", before " 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	044/0894 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.

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	49	I recommend no modification to the Plan.	Accepted	No 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	50	I recommend that the Plan be modified in accordance with Pre-Inquiry Change 14.	Accepted	No further 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 Wating 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	007/0734 Harrow Nature Conservation Forum	79	I recommend no modification to the Plan.	Accepted	No modification required.
EP47 and Para 3.146: POS - Park View land	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 065/0591 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 SPG.
D6 and D7: Design in Emp. Areas, Retail Areas & 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 Greenery	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) Ld	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 <i>encouraging</i> their retention and should remain unchanged.
D15: The Use of Statutorily and Locally Listed Buildings (and PIC29)	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) Ld 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 115/1252 Martin Grant Homes (UK) Ltd	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
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: Reallocating 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 C J Wayman 092/1137 Ros Shaw 093/1141 Mrs Rambai Kami 094/1145 Barry Gilbert 095/1149 Mir J Rawal 096/1153 Christine Allain 097/1157 Mir & Mrs Menahem 098/1161 Mrs P Rosenberg 099/1165 J Fernandes 100/1169 Z Wadood 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 Coppin 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: Reallocating Available Roadspace and Managing Traffic (Cont)	(The above objections are dealt with in relation to ST3: London-Wide Highway Network) 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	106	I recommend no modification to the Plan.	Accepted	No modification required.
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 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. T15 will be considered as part of redrafting of T13 and T14
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 Homes 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 in part	The Inspector’s recommendation creates a more concise policy. It is, however, considered that the Inspector’s minimum figure should be amended to reflect the approach taken in the draft London Plan.
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)Ltd 115/1251 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 in part	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. The Inspector’s recommendation that the policy be set out in accordance with Circular 6/98 does not reflect the current situation, with the consultation draft PPS3 having been published since his report.

H6: Affordable Housing and H7: Housing for Key Workers (Cont)	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						
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	The clear intentions of the policy remain following acceptance of the deletion.		
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	No modification required.		
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	Practical experience in applying the policy and the scale of activity taking place indicate deletion should not be problematic.		
H11: Maintenance and Improvement to Exist. Housing Stock	028/0764 G Gitter	134	I recommend no modification to the Plan.	Accepted	No modification required.		
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 (D).	Accepted	The scale of activity taking place indicate deletion should not be problematic.		

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	No modification required.
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	Appropriate parking and traffic considerations will apply to this policy as a result of the re-writing of Policy T13.
H18: Access for Special Households with Particular Needs	122/1337 Housing consortium	136	I recommend no modification to the Plan.	Accepted	No modification required.
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 whilst this may be seen as the most appropriate way to proceed, particularly in view of the London Plan, it is only necessary to provide a revised version of this Part 2 policy.

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, EM15 and EM16: Business etc Use – Designated Areas and Beyond.	014/0397 Kodak Ltd 065/0593-0594 Peter D Kyte Associates 029/0771 R.C. Watson 078/1090 Mr J Carpenter (Harrow FoE) 078/1096 Mr J Carpenter (Harrow FoE) 114/1235 Bryant Homes (Thames Valley) Ltd and Bryant Lifestyle Homes 120/1286 Fairview New Homes Ltd 122/1340-1341 Housing consortium 134/1437-1438 B&Q plc 134/1440 B&Q plc	146	I recommend no modification to the Plan.	Accepted	No modification required.

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 (NTRO)	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 (C18 in FDD): 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 Inspector's re-worded policy should be further modified to reflect this.
C6 (C5 in FDD) 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 (C6 in FDD): 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. No modification required.
New Policy	061/1027 Harrow College	164	I recommend no modification to the Plan.	Accepted	
C8 (C7 in FDD): 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 (C8 in FDD): 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 (C9 in FDD): 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	The need for good design and the requirement to comply with other policies will not be compromised.
C11 (C10 in FDD): 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 (C12 in FDD): Doctors' Surgeries	016/0755 NHS Executive (North Thames Regional Office)	168	I recommend no modification to the Plan.	Accepted	No modification required.
C18 (C16 in FDD): 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 (C19 in FDD): 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 whilst this may be seen as the most appropriate way to proceed, particularly in view of the London Plan, it is only necessary to provide a revised version of this Part 2 policy.
C21 (C20 in FDD): 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 (C22 in FDD): 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	The UDP provides a framework for dealing with a variety of needs including those from ethnic minorities. Other specific policies adequately cover issues relating to the needs of minority groups. The Council's commitment to equality will not be compromised by the deletion of the policy.

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 I3: 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.

I5 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.
I7: 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 Laing 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 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)	222/3014P 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 Sproull & Co	184	I make no recommendation.		
PS 7: Land north of Junction Road	077/0659 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.	Accepted	The future parking provision on site can be adequately addressed through other policies in the Plan.
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.	Accepted	Limiting the extent of development to the curtilage of the existing buildings reduces the site to a size that does not justify its inclusion as a Proposal Site. Future use of the site can be adequately controlled by other plan policy.

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 in part	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: a) The conversion of the most historic parts of the building for residential and A3 use (subject to viability/sustainability issues being	Accepted in part	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." (Third para to be retained).</p>		residential development of the site, and can now be deleted from the plan. The qualification to paragraph 1 recommended by the Inspector is unnecessary.
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.	Accepted	No modification required.
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.	Accepted	The change would be consistent with the approved scheme for the redevelopment of the Rayners Lane Estate.
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" .	Accepted	In the event of development it should be possible to incorporate a suitably designed footpath link without causing undue harm to the nature conservation interest of the site.

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 Wadood 101/1175 Guys Newsagents 102/1179 Mr T Selvarajah 103/1183 Mr, Mrs & Mistr 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 Braidman 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.

This page is intentionally left blank

LONDON BOROUGH OF HARROW

Meeting:	Development Control Committee Unitary Development Plan Advisory Panel
Date:	10 th December 2003 5 th January 2004
Subject:	Planning Services Annual Monitoring Report 2002/03
Key Decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Planning, Development , Housing and Best Value
Status:	Part I
Ward:	All
Enclosures:	Appendix 1 – End of year statement 2001/2002 Appendix 2 – End of year statement 2002/2003 Appendix 3 – Planning Application Workload 1989-2003 - Planning Application Performance 1989-2003

1. Summary / Reason for Urgency (if applicable)

1.1 The performance monitoring statement for the first six months of 2002/03 was circulated to Members in January this year. The end of the year statement is attached. A commentary on the statement is set out below, which in particular examines performance against key indicators and targets, implications for Planning Delivery Grant (PDG) for 2004/05 and the implications for the 'naming and shaming' of the Council as a 'planning standards authority'. The report also reviews workload trends and the implications in all service areas of increasing applications, legislative changes and regional/sub-regional working.

To ensure members are aware of the workload/financial issues in advance of service planning decisions for 2004/05.

2. Recommendation (for decision by the Development Control Committee)

2.1 The Committee is recommended to note the report and the potential implications for meeting strategic targets and PDG.

FOR DECISION

REASON: To ensure that members are aware of current workload and performance issues.

3. Consultation with Ward Councillors

3.1 None

4. Policy Context (including Relevant Previous Decisions)

4.1 Previous Monitoring Reports and ODPM Best Value and Planning Delivery Grant Advice.

5. Relevance to Corporate Priorities

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

6. Background Information and Options Considered

6.1 Once again, the trend in numbers of planning and building control applications has been upwards, with a 12% increase in planning applications received and a 15% increase in building control. This pattern has continued on into the current year. The pressures to improve performance, to meet Government and local Best Value Performance Indicators and to accommodate increasing workload puts increasing strain on the services, at a time when recruiting and retaining staff is proving very difficult.

During the year to March 2003, the primary objective in policy was to prepare for the UDP Inquiry, which took place in February-April. The process was managed successfully, with pre-inquiry negotiations resulting in many objections being withdrawn and the matters to be determined by the Inspector reduced to manageable levels. At the same time, there has been increased pressure to initiate, support and develop area and site specific work for regeneration and town centres, development of major sites and to support the New Harrow Project. A number of major applications involving conservation areas and listed buildings placed demands on conservation resources limiting the time available for pro-active work on policy and site specific issues, and this has followed on into the current year with a series of high profile public inquiries.

6.2 Development Control

As mentioned above, 2002/03 saw a 12% increase in the numbers of planning applications received, and the numbers of applications determined showed an 11.4% increase. This clearly represents a significant increase in workload. Two additional posts were created in development control as a result of the increased budget provision and these together with the restructuring into Delegated and Committee teams enabled the workload to be managed, but not to improve application-handling times significantly from 2001/02. While the first three quarters of the year showed consistent improvement, unprecedented turnovers of staff in the last quarter (Jan-March 2003) resulted in poor figures which dragged down the overall year's performance. Since that time, new permanent staff have been appointed, and with a more settled situation and reduced temporary cover, the first six months of the current year are showing much better figures. However, the staffing situation in

London and the South East remains very volatile and the position can change very quickly.

The Government is expressing particular concern over performance on major applications (DC6). The numbers of such applications increased during 2002/03 and have continued to increase in the current year. New monitoring mechanisms have now been put in place to manage performance which are producing a quicker turnround, but there have been a number of large, complex and controversial schemes submitted which are very difficult to deal with within 13 week, particularly where they involve S106 agreements. These agreements can lead to protracted negotiations with developers over the terms of the agreement. In other cases the developer delays the point at which they enter in to the agreement for as long as possible. This puts much greater pressure on ensuring that the more straightforward major schemes are determined within the timescale. Revised working arrangements are being developed to deal with these issues as quickly as possible and in some cases before the matter goes to committee.

The 'minor' applications category continues to give cause for concern. While the revised delegation arrangements have been fully operational since October and will assist to an extent in improving the performance, they will not put the Council in a position to meet the Government target of 60% in 8 weeks. As long as significant numbers of such applications still fall to Committee for decision, this target will be difficult to achieve.

The number of responses to notifications (DC15) increased by over 20% during the year, indicating an increase both in public interest in planning issues and resultant workload.

Members should also appreciate that improvements in meeting targets for determining applications have been in part achieved through reducing scope for negotiating amendments. While applicants are given the opportunity to amend schemes where straightforward changes would result in recommendation for approval, they are given deadlines for submission which if not met will result in refusal. Obviously unacceptable schemes will result in early refusals. Wherever possible, informatives are attached to refusal decision notices explaining what can be done to achieve an acceptable scheme. For householder applications, the Supplementary Planning Guidance approved earlier this year provides very clear and detailed guidance, and this is widely available.

6.3 **Forward Planning**

The UDP Inquiry finished in mid-April 2003 and the Inspector's Report was received in August. The preparation for the Inquiry was the key priority task for Forward Planning staff for most of 2002/03. As a result, many of the objections were resolved through discussion and negotiation prior to Inquiry, reducing Inquiry time. This has subsequently resulted in relatively small number of issues to be dealt with through amendment and modification.

Monitoring of key performance indicators showed a near 50% increase in permissions for new dwellings together with a doubling of the percentage of affordable units permitted from 22.4% to 45%. This was mainly as a result of a

number of large high density affordable housing schemes being approved late in the year, including the Rayners Lane Estate development and sites in Wealdstone. 100% of new development was approved on previously developed land.

During the course of 2002/03 six new conservation area policy guidelines were approved, bringing the total to 18 out of a possible 28. Projects at Canons Park (now with a new post funded from Heritage Lottery Fund grant), the Harrow on the Hill Heritage Regeneration Scheme and Headstone Manor have all been progressed, although Headstone Manor has been the subject of delay. Major applications (and subsequent appeals) at the Kings Head, East End Farm and Harrow Hospital have proved very resource intensive for the Conservation Section, particularly in the current year.

The Research and Information workload was intensive following the availability of the 2001 Census results. A start has been made in analysing results as they are released and this work will be continuing through 2003/04. Contributions to the preparation of the 'Vitality Profiles' in support of the New Harrow Project enabled the South Harrow Pilot to be launched in April 2003, and again this work is continuing as NHP is rolled-out in further areas.

Town Centre Strategy and development has taken a much higher profile, with a draft Town Centre Strategy agreed for consultation in April 2003. Support for the Wealdstone Regeneration initiatives also continued through the year, in particular in respect of the Wealdstone Centre proposals and key housing sites.

2002/03 was also the year which saw Government proposals for the reform of the Planning System, which resulted in many consultation documents from ODPM to be considered. The completion of the statutory processes for the new Town Planning and Compulsory Purchase Act in 2004 will bring with it a fundamental change in development planning, with a more intensive and shorter timescale for producing plans which will have resource implications.

The Mayor's London Plan was the subject of an Examination in Public (EIP) in the latter part of 2002/03. The response to consultation and preparing and presenting evidence to the EIP on behalf of both the Borough and the West London Alliance represented a significant additional workload. This will continue with the preparation of Sub-Regional Development Frameworks.

6.4 **Planning Standards Performance**

The Government identified Harrow as a 'Planning Standards' authority for 2002/03, based on our performance for dealing with applications in 2000/01. The Government expected Harrow to deal with 50% of 'minor' applications within 8 weeks and 65% of 'other' applications. The actual performance was 37% and 61% accordingly. The difficulties in meeting these figures are outlined in the above paragraphs. As a result, consultants working for ODPM are scrutinising the Council's performance for report back to Government on whether any further action should be taken. They have had a comprehensive set of documents/statistics and an explanation of the difficulties of meeting performance levels at a time of consistently increasing workload and recruitment and retention difficulties. The outcome of their study should be more available to the Council in the New Year.

The Council has also been identified as a 'Planning Standards' authority for 2003/04, on the basis of the performance on 'major' applications. The target set is 50% determined within 13 weeks. On the basis of the first six months performance (42%), this may be achievable. However, there have been a number of large, complex applications received recently which will impact on performance. Any applications requiring a S106 agreement are extremely unlikely to be determined within the time limit.

6.5 **Planning Delivery Grant (PDG)**

Members will be aware that in January 2003 the Council was awarded a total of £252,000 Planning Delivery Grant, based on the improvement in DC performance from September 2001 to September 2002. A report outlining this was to be considered at DC Committee and Cabinet earlier this year.

For next year, the PDG allocations are being made again on the basis of DC performance, from September 2002 to September 2003, and also for Development Plan progress. For DC performance, the award is likely to be minimal (if any) as it will be based on improvement over the period, which for reasons explained above, was not the case in Harrow. The criteria and timing for the policy element is not yet known, but the latest information suggests that it will not be available until later in 2004.

Much of the PDG award for this year has been directed towards DC staffing and the benefits of this are showing clearly in the improvement in performance in the first six months of 2003/04. However, unless this funding is continued for 2004/05 there is a real danger that this progress will be lost.

6.6 **Building Control**

The situation in Building Control reflected that in Development Control, with a near 15% increase in Full Plans applications received. Apart from a period early in the year when staffing was particularly difficult, performance has been maintained at a consistently high levels (Indicators BC1-BC3).

The increase in plans deposited was accompanied by a similar increase of 12% in the number of site inspections carried out during the year, and a slight increase in the numbers of inspections per job (BC17 and BC18). The numbers of applications dealt with per officer and number of site visits per officer also increased slightly.

The number of applications lost to the private Approved Inspectors was down by over 25% both in the domestic and commercial sectors (BC 26 & BC 29). Due to the overall number of applications being on the increase, the improvement in market share can be judged to be the result of an effective marketing strategy and the ability to sustain a high standard of service delivery. The improvement in market share increased income (BC 5) and therefore overall cost efficiency.

The difficulties of recruiting and retaining staff continued throughout 2002/03 and are currently showing no indications of improving within the London region. The introduction of a market supplement at the end of March 2003 of £2,000, as a

recruitment and retention initiative has failed to attract the required professionally qualified applicants to date and is currently being reviewed. Other features such as working conditions when compared with neighbouring local authorities may also be a contributory factor in recruitment and retention problems.

7. Finance Observations

7.1 Contained within the report.

8. Legal Observations

8.1 Contained within the report.

9. Conclusion

9.1 Members are invited to note the performance of the Planning and Building Control services during 2002/03 and the implications of increasing workloads in all areas and the impact on Government and Council targets.

10. Background Papers

10.1 None

11. Author

11.1 Graham Jones, Chief Planning Officer
0208 414 1466

HARROW PLANNING SERVICES 2002-2003

PERFORMANCE MONITORING	Full Year 2001/02	Apr	May	Jun	1 st Quarter CUMULATIVE	Jul	Aug	Sep	2 nd Quarter CUMULATIVE	Oct	Nov	Dec	3 rd Quarter CUMULATIVE	Jan	Feb	March	Full Year	% increase from 2001/02
------------------------	-------------------	-----	-----	-----	------------------------------------	-----	-----	-----	------------------------------------	-----	-----	-----	------------------------------------	-----	-----	-------	-----------	-------------------------

DEVELOPMENT CONTROL																			
Applications																			
DC1	Received	2542	244	288	232	764	282	248	217	1511	236	232	2153	209	250	238	2850	12.1	
DC2	Determined	2221	269	208	190	665	190	215	233	1303	237	189	1920	158	194	206	2475	11.4	
DC3	Decisions Granted: Nos (%)	80				474/85				875/82			1309/81				1669/80	0	
DC4	Delegated decisions: Nos (%)	82				566/85				1138/87			1651/86				2107/85	3.7	
DC5	Decided in 8 weeks: Nos (%)	58				427/64				837/64			1205/63				1448/58.5	0.86	
DC6	Major apps decided in 13 weeks: Nos (%)	6 of 22/27				6 of 7/86				7 of 11/64			8 of 20/40				10 of 31/32	18.5	
DC7	BVP 1109a	109 of 292/37				33 of 83/40				70 of 161/43			114 of 257/44				126 of 344/37	0	
DC8	BVP 1109b	1181 of 1904/62				393 of 575/68				764 of 1131/67			1023 of 1566/65				1186 of 1947/61	-1.6	
DC9	Other apps decided in 8 weeks: Nos (%)	43	6	0	2	8	0	4	0	12	0	0	16	2	5	5	28	-34.9	
	Reversals of officer Rec. (Committee)																		

HARROW PLANNING SERVICES 2002-2003

PERFORMANCE MONITORING		Full Year 2001/02	Apr	May	Jun	1 st Quarter JAN FEB MAR	Jul	Aug	Sep	2 nd Quarter APR MAY JUNE	Oct	Nov	Dec	3 rd Quarter JULY AUG SEPT	Jan	Feb	March	Full Year	% Increase from 2001/02
DC10	Application fees received (£'000's)	335.2				111.3				247				423				519.4	54.9
DC11	DC net cost / head of population (£)	3.24								3.18								3.29	1.54
DC12	Average fee per application (all) (£)	132				146				163				196				182	37.9
DC13	Gross cost per application received (£)	410								380								422	2.93
DC14	Net cost per application received (£)	244								223								240	1.6
DC15	Consult'ns: Sent Replied (%)	27,054 3,711 13.7				7,002 505 7.2				17,341 1,675 9.6				2498 2729 10.9				27487 4526 16.5	1.6 21.96 20.43
DC16	Legal (S.106) Agreements authorised	Not available	2	2	0	4	0	0	2	6	2	0	1	9	2	0	1	12	N/A
Appeals																			
DC17	Lodged	112	8	13	4	25	5	3	6	39	6	12	4	61	13	8	11	93	-16.96
DC19	(i) by written representation	80	6	11	3	20	3	3	4	30	6	8	3	47	9	3	5	64	-20
DC20	(ii) by Informal Hearing	25	2	2	1	5	2	0	1	8	0	1	1	10	3	4	3	20	-0.2

HARROW PLANNING SERVICES 2002-2003

PERFORMANCE MONITORING	Full Year 2001 /02	Apr	May	Jun	1 st Quart or Q1/Q4 or Q1/A1 or Q1/A2			Jul	Aug	Sep	2 nd Quart or Q2/Q4 or Q2/A1 or Q2/A2			Oct	Nov	Dec	3 rd Quart or Q3/Q4 or Q3/A1 or Q3/A2			Jan	Feb	March	Full Year	% Increase from 2001/02
					Q1	Q2	Q3				Q4	A1	A2				A3	A4						
DC21	(iii)by Public Inquiry	7	0	0	0	0	0	0	0	1	1	0	0	3	-	4	1	1	3	9	28			
DC22	Determined Allowed: Nos (%)	79	2	11	11	24	6	9	7	46	10	7	5	68	1	3	14	86	8.86					
DC23	Enforcement / Complaints	41.7	50	64	27	46	50	66	28	48	60	14	60	47	50	33	36	45	7.91					
DC23	Complaints received	581	82	58	49	189	48	67	49	353	76	48	38	515	37	43	38	633	8.93					
DC24	Enforcement Notices served	17	6	2	0	8	0	3	1	12	4	2	2	20	-	6	1	27	58.8					

BUILDING CONTROL

Full Plans Applications		Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	March	Full Year	% Increase				
BC1	Full Plans received	1082	105	136	98	339	123	113	86	661	94	93	79	927	109	105	101	1242	14.78
BC2	Plans vetted in 15 days (%)	95	100	87.5	78.6	88.7	96	100	99	94	99	98	100	96	100	100	100	96	1.05
BC3	Decided within 5 weeks or 8 weeks by agreement (%)	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	0
Building/Commencement Notice applications																			
BC4	Building Notices received	778	67	67	51	185	57	55	75	372	55	51	42	520	49	56	57	682	-12.34

HARROW PLANNING SERVICES 2002-2003

PERFORMANCE MONITORING	Full Year 2001/02	Apr	May	Jun	1 st Quarter			Jul	Aug	Sep	2 nd Quarter			Oct	Nov	Dec	3 rd Quarter			Full Year	% Increase from 2001/02
					1 st QUARTER	2 nd QUARTER	3 rd QUARTER				1 st QUARTER	2 nd QUARTER	3 rd QUARTER								

Financial																					
BC5	Application income (£'000's)	646				255						462						598		706	9.29
BC6	Net cost per application (£)	-62.6										-101								-39.1	37.53
BC7	Gross cost per application (£)	266										218								319	19.92
BC8	Average charge income per app'n (£)	329										446								358	8.81
BC9	Net cost per head of pop (£)											-0.75								-0.36	
BC10	Value of work (est) (£)	46.7M				14.4M						25.6M						34.2m		63.7m	36.4
BC11	Net cost per head of population (£)																				
BC12	(i) Charge earning	-0.55										-1.07								-0.36	34.5
BC13	(ii) Non-charge earning	0.75										0.32								0.75	0

HARROW PLANNING SERVICES 2002-2003

PERFORMANCE MONITORING		Full Year 2001/02	Apr	May	Jun	1 st Quarter OCTOBER NOVEMBER DECEMBER	Jul	Aug	Sep	2 nd Quarter JANUARY FEBRUARY MARCH	Oct	Nov	Dec	3 rd Quarter APRIL MAY JUNE	Jan	Feb	March	Full Year	% Increase from 2001/02
BC14	(iii) Net expenditure per head for total Building Control	0.20								-0.71								0.39	95
Workload																			
BC15	Projects commenced	1023				259				567				764				1069	4.49
BC16	Projects completed (%)	56.6				36				42				46				59.4	4.95
BC17	Inspections carried out	11,276				2,775				5,534				8,104				12,610	11.83
BC18	Average number of inspections carried out / completed job	5.9				4.1				6.1				6.0				6.1	3.39
BC19	Site visits per technical officer	1,073				264				461				736				1,096	2.14
BC20	Applications per technical officer	182				43.9				86.1				131.4				185	1.64
Enforcement																			
BC21	Notices served	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
BC22	Works discovered without notification	38	6	7	9	19	6	7	9	41	9	6	12	68				89	134

HARROW PLANNING SERVICES 2002-2003

PERFORMANCE MONITORING	Full Year 2001/02	Apr	May	Jun	1 st Quart or Q101 APRIL MAY JUNE	Jul	Aug	Sep	2 nd Quart or Q202 JULY AUG SEPT	Oct	Nov	Dec	3 rd Quart or Q303 OCTOBER NOVEMBER	Jan	Feb	March	Full Year	% Increase from 2001/02

Letters and Correspondence																			
BC23	Letters received	n/m			1,195				2,397				3,616					5,006	
BC24	Letters replied to within 10 days (%)	n/m			71				70				71					71	
BC25	Telephone calls answered within 5 rings (%)	86.77	84.5	90.5	88.0	88.3	90	89	88.4	89	91	91	89	93	92	91	89	89	2.57
				8	1														
Approved Inspector Initial Notices																			
BC26	Domestic initial notices	17			3				6				10					12	-29.41
BC27	Units	316			17				85				210					242	-23.41
BC28	Estimated loss of income (£)	55,430			4,256				16,370				36,516					47,800	-13.76
BC29	Non-domestic initial notices	31			4				14				20					23	-25.8
BC30	Estimated value of work (£)000's	783			82				214				784					1,230	57

HARROW PLANNING SERVICES 2002-2003

PERFORMANCE MONITORING		Full Year 2001/02	Apr	May	Jun	1 st Quarter CHUKA MAY JUN	Jul	Aug	Sep	2 nd Quarter CHUKA MAY JUN	Oct	Nov	Dec	3 rd Quarter CHUKA MAY JUN	Jan	Feb	March	Full Year	% Increase from 2001/02
BC31	Estimated loss of income (£)	13,634				1,487				4,515				9,117				15,316	12.34
FORWARD PLANNING																			
Development Pipeline																			
FP1 (a)	New housebuilding: dwellings completed (gross)	501 (Jan to Dec 01)	36 (Jan to Mar 02)												407 (Jan to Dec 02)				640
(b)	dwellings permitted (gross)	827				156				243				1138 (895)					1284
(c)	percentage affordable, permitted	22.4				13				8				2					45
(d)	percentage built on previously developed land	94 2001/02													100% (Jan to Dec 02)				100

HARROW PLANNING SERVICES 2002-2003

PERFORMANCE MONITORING		Full Year 2001/02	Apr	May	Jun	1 st Quarter CUMULATIVE MAY 02	Jul	Aug	Sep	2 nd Quarter CUMULATIVE MAY 02	Oct	Nov	Dec	3 rd Quarter CUMULATIVE MAY 02	Jan	Feb	March	Full Year	% Increase from 2001/02	
FP2	House conversions and change of use built - net increase in dwellings	15 (Jan to Mar 02)													37 (Jan to Dec 02)					55
FP3	Business, industrial and warehousing development ('000's sq.ms.)	N/A													N/A					N/A
Development Appraisal																				
FP4	Development briefs/area guidelines: (a) approval for consultation purposes (b) completed following consultations	1								0										0
										0										0
Conservation																				
FP5	Conservation areas with policy guidelines	12 of 27 approved 44								17 of 28 (5 in draft) 61										18 of 28 64
										15 of 27 (3 in draft) 56										45.45

HARROW PLANNING SERVICES 2002-2003

PERFORMANCE MONITORING		Full Year 2001/02	Apr	May	Jun	1 st Quarter CUM ULAT IVE	Jul	Aug	Sep	2 nd Quarter CUM ULAT IVE	Oct	Nov	Dec	3 rd Quarter CUM ULAT IVE	Jan	Feb	March	Full Year	% increase from 2001/02	
FP6	Listed buildings at risk and as % of total	10 3.7	8 3.3				11 4.1						10 3.7					10 3.7	0	
Tree Preservation																				
FP11	Tree Preservation Orders:																			
	(a) confirmed orders	1																		
	(b) number of trees	13								14										100
	dwelling																			7.69
Other items																				
General Planning																				
PS1	Gross cost of Planning per head of population excluding Building Control (£)	10.63																12.43	16.93	
PS2	Letters (a) number received (b) percentage of replies in 7 days	Not available																1,572	46.4	

This page is intentionally left blank

HARRROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING

Full Year 2002 /03	Apr	May	Jun	1 st Quart er canles vs	Jul	Aug	Sep	2 nd Quart er canles vs	Oct	Nov	Dec	3 rd Quart er canles vs	Jan	Feb	March	Full Year	% increa se from 2002/0 3
--------------------	-----	-----	-----	------------------------------------	-----	-----	-----	------------------------------------	-----	-----	-----	------------------------------------	-----	-----	-------	-----------	---------------------------

DEVELOPMENT CONTROL

Applications																	
DC1	Received	2850				799		792									
DC2	Determined	2475				734		712									
DC3	Decisions Granted: Nos (%)	1669 (80%)				468 (75%)		423 (68%)									
DC4	Delegated decisions: Nos (%)	2107 (85%)				634 (86%)		614 (86%)									
DC5	Decided in 8 weeks: Nos (%)	1448 (58.5%)				503 (68%)		523 (73%)									
DC6	Major apps decided in 13 weeks: Nos (%)	10 of 31 (32%)				2 of 12 (17%)		11 of 26 (42%)									
DC7	Minor apps decided in 8 weeks: Nos (%)	126 of 344 (37%)				33 of 95 (35%)		69 of 207 (33%)									
DC8	Other apps decided in 8 weeks: Nos (%)	1186 of 2100 (63%)				47 of 627 (75%)		954 of 1213 (79%)									
DC9	Reversals of officer Rec. (Committee)	31	4	0	0	4	0	11	1	6	1	1					

HARROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING

	Full Year 2002 /03	Apr	May	Jun	1 st Quarter	Jul	Aug	Sep	2 nd Quarter	Oct	Nov	Dec	3 rd Quarter	Jan	Feb	March	Full Year	% increase from 2002/03	
DC10	Application fees received (£'000's)	519.4			147.8				155.0										
		25			80				037										
DC11	DC net cost / head of population (£)																		
DC12	Average fee per application (all) (£)	182			185				196										
DC13	Gross cost per application received (£)	422																	
DC14	Net cost per application received (£)	240																	
DC15	Consult'ns: Sent Replied (%)	27487 4526 16.5																	
DC16	Legal (S.106) Agreements authorised	12																	
Appeals																			
DC17	Lodged	85	8	11	6	25	7	7	11	50	6								
DC19	(i) by written representat'n	56	6	6	4	14	6	5	8	33	5								
DC20	(ii) by Informal Hearing	20	1	4	2	7	1	2	3	13	1								

HARROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING	Full Year 2002 /03	Apr	May	Jun	1st Quarter duration	Jul	Aug	Sep	2nd Quarter duration	Oct	Nov	Dec	3rd Quarter duration	Jan	Feb	March	Full Year	% Increase from 2002/03
-------------------------------	---------------------------	------------	------------	------------	--	------------	------------	------------	--	------------	------------	------------	--	------------	------------	--------------	------------------	--------------------------------

DC21	(ill)by Public Inquiry	9	1	1	-	2	-	-	2	-									
DC22	Determined	86	2	2	4	8	2	3	13	4									
DC23	Allowed: Nos (%)	39	-	-	25%	25%	-	-	7%	25%									
Enforcement / Complaints																			
DC24	Complaints received	633	56	45	74	175	74	73	102	249	76								
DC25	Enforcement Notices served	27							9										

BUILDING CONTROL

Full Plans Applications																			
		1242	126	133	140	399	138	89	82	708	110								
BC1	Full Plans received																		
BC2	Plans vetted in 15 days (%)	96	99	85	90	89	98	97	96	93	96								
BC3	Decided within 5 weeks or 8 weeks by agreement (%)	100	100	100	100	100	100	100	100	100	110								
Building/Commencement Notice applications																			
BC4	Building Notices received	682	62	70	68	200	68	60	72	400	69								

HARROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING

		Full Year 2002 /03	Apr	May	Jun	1 st Quart er number m	Jul	Aug	Sep	2 nd Quart er number m	Oct	Nov	Dec	3 rd Quart er number m	Jan	Feb	March	Full Year	% Increa se from 2002/0 3
Financial																			
BC5	Application income (£'000's)	706				275				487									
BC6	Net cost per application (£)	-39.1								-121									
BC7	Gross cost per application (£)	319								317									
BC8	Average charge income per app'n (£)	358								439									
BC9	Net cost per head of pop (£)	-0.36								-0.63									
BC10	Value of work (est) (£m)	63.7				16m				31m									
BC11	Net cost per head of population (£)																		
BC12	(i) Change earning	-0.36								-1.07									
BC13	(ii) Non-change earning	0.75								0.41									
BC14	(iii) Net expenditure per head for total Building Control	0.39								-0.73									
Workload																			

HARROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING		Full Year 2002 /03	Apr	May	Jun	1 st Quarter number	Jul	Aug	Sep	2 nd Quarter number	Oct	Nov	Dec	3 rd Quarter number	Jan	Feb	March	Full Year	% Increase from 2002/03	
BC15	Projects commenced	1069				310				763										
BC16	Projects completed (%)	59.4				41.1				34.7										
BC17	Inspections carried out	1261				2944				5972										
BC18	Average number of inspections carried out / completed job	6.1				7.65				7.9										
BC19	Site visits per technical officer	1096				226				459										
BC20	Applications per technical officer	185				46.5				86										
Enforcement																				
BC21	Notices served	0	0	0	0	0	0	0	0	0										
BC22	Works discovered without notification	89	4	6	4	14	6	5	7	32	8									
Letters and Correspondence																				
BC23	Letters received	5006				1893				2941										
BC24	Letters replied to within 10 days (%)	71				73				74										

HARROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING

		Full Year 2002 /03	Apr	May	Jun	1 st Quart er or canula ve	Jul	Aug	Sep	2 nd Quart er or canula ve	Oct	Nov	Dec	3 rd Quart er or canula ve	Jan	Feb	March	Full Year	% Increa se from 2002/0 3	
BC25	Telephone calls answered within 5 rings (%)	89	86	85	86	86	82	84												
Approved Inspector Initial Notices																				
BC26	Domestic initial notices	12				87				11										
BC27	Units	242				150				177										
BC28	Estimated loss of income (£)	47,800				24,686				30,967										
BC29	Non-domestic initial notices	23				8				21										
BC30	Estimated value of work (£)	1.23 m				1.09 m				2.3m										

HARROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING

Full Year 2002 /03	Apr	May	Jun	1 st Quarter or calendar year	Jul	Aug	Sep	2 nd Quarter or calendar year	Oct	Nov	Dec	3 rd Quarter or calendar year	Jan	Feb	March	Full Year	% Increase from 2002/03
--------------------	-----	-----	-----	--	-----	-----	-----	--	-----	-----	-----	--	-----	-----	-------	-----------	-------------------------

BC31	Estimated loss of income (£)	15,316			9,677			20,907										
FORWARD PLANNING																		

Development Pipeline																		
FP1 (a)	New housebuilding: dwellings completed (gross)	640						243										
(b)	dwellings permitted (gross)	1284						211										
(c)	percentage affordable, permitted	45%						43.6%										0%

HARROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING		Full Year 2002 /03	Apr	May	Jun	1 st Quart er of calendar year	Jul	Aug	Sep	2 nd Quart er of calendar year	Oct	Nov	Dec	3 rd Quart er of calendar year	Jan	Feb	March	Full Year	% Increase from 2002/03	
(d)	percentage built on previously developed land	100 %																		
FP2	House conversions and change of use built - net increase in dwellings	55																		
FP3	Business, industrial and warehousing development ('000's sq.ms.)	N/A																		
Development Appraisal																				
FP4	Development briefs/area guidelines: (a) approval for consultation purposes (b) completed following consultations	1								0										
		0								1										

HARROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING	Full Year 2002/03	Apr	May	Jun	1 st Quarter	Jul	Aug	Sep	2 nd Quarter	Oct	Nov	Dec	3 rd Quarter	Jan	Feb	March	Full Year	% increase from 2002/03
------------------------	-------------------	-----	-----	-----	-------------------------	-----	-----	-----	-------------------------	-----	-----	-----	-------------------------	-----	-----	-------	-----------	-------------------------

Conservation																			
FP5	Conservation areas with policy guidelines	18			18				18										
		64%			64%				64%										
FP6	Listed buildings at risk and as % of total	10				10													
		3.7%				3.7%													
Tree Preservation																			
FP11	Tree Preservation Orders:																		
	(a) confirmed orders	2							1										
	(b) number of trees	14							15										
Other items																			
FP12	Net cost per head of population per year (Forward Planning). Excluding capital financing																		
General Planning																			
PS1	Gross cost of Planning per head of population excluding Building Control																		

HARROW PLANNING SERVICES 2003-2004

PERFORMANCE MONITORING	Full Year 2002 /03	Apr	May	Jun	1st Quarter cumulated	Jul	Aug	Sep	2nd Quarter cumulated	Oct	Nov	Dec	3rd Quarter cumulated	Jan	Feb	March	Full Year	% Increase from 2002/03	

PS2	Letters (a) number received (b) percentage of replies in 7 days																		
------------	---	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

**Table 1 - Harrow Planning Services
Development Control - Planning Application Workload 1989 - 2003**

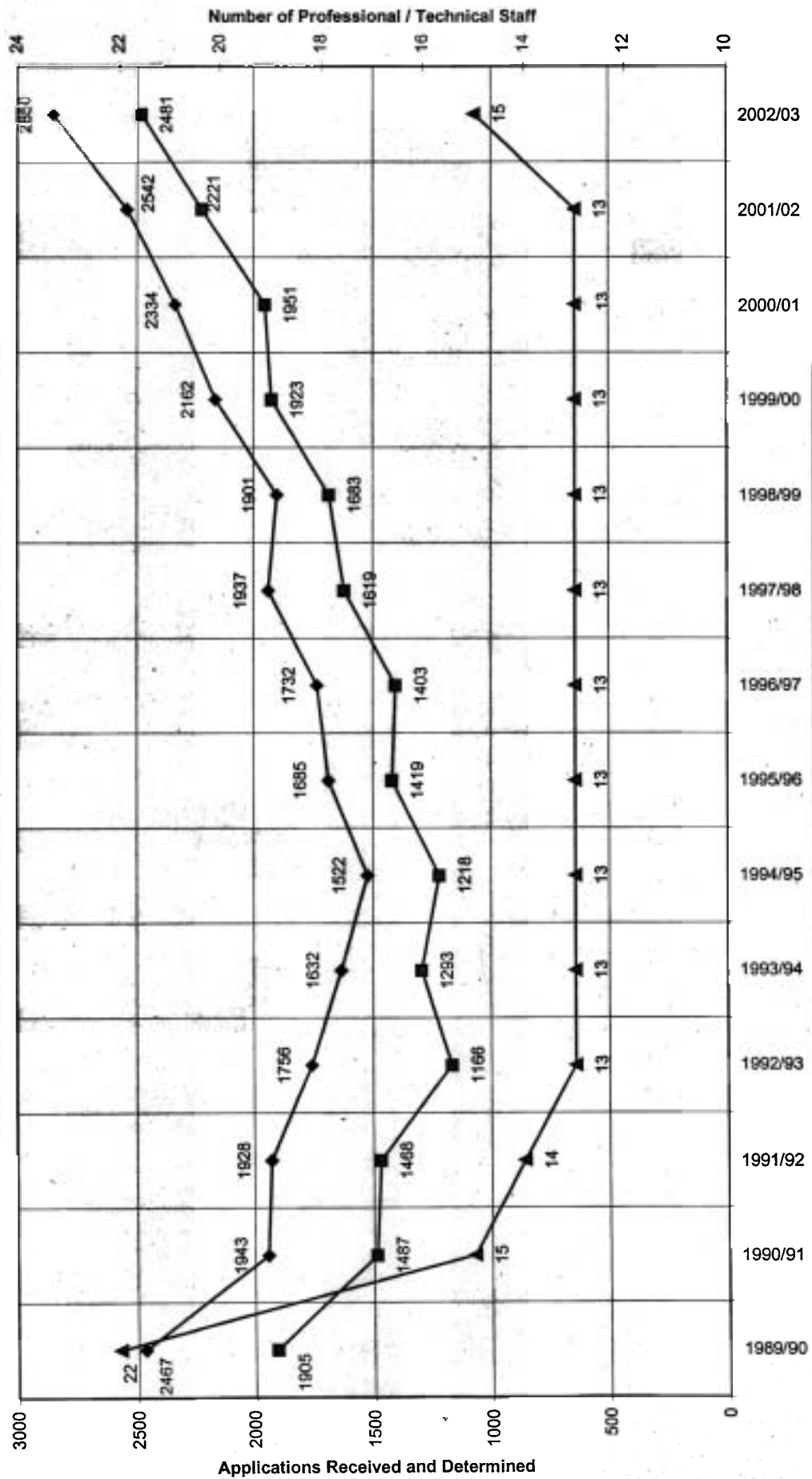


Table 2 - Harrow Planning Services
 Development Control - Planning Application Performance 1989 - 2003

