



UNITARY DEVELOPMENT PLAN ADVISORY PANEL

THURSDAY 18 MARCH 2004
7.30 PM

PANEL AGENDA (ADVISORY)

COMMITTEE ROOM 6, HARROW
CIVIC CENTRE

MEMBERSHIP (Quorum 3)

Chair: Councillor Burchell

Councillors:

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

Reserve Members:

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

Issued by the Committee Services Section,
Law and Administration Division

Contact: Rebecca Arnold, Committee Administrator
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

THURSDAY 18 MARCH 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 - 10)
That the minutes of the meeting held on 5 January 2004, 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. **Progressing the HUDP, and Preparation for the Local Development Framework in Harrow:** (Pages 11 - 18)
Report of the Chief Planning Officer.
- Enc. 9. **Harrow School Conservation Area: Draft Conservation Area Character Study Including Planning Policies:** (Pages 19 - 32)
Report of the Chief Planning Officer.
- Enc. 10. **The London Plan:** (Pages 33 - 46)
Report of the Chief Planning Officer.

- Enc. 11. **Planning Policy Statement (PPS6): Planning for Town Centres:** (Pages 47 - 54)
Report of the Chief Planning Officer.

AGENDA - PART II (PRESS & PUBLIC EXCLUDED) - NIL

Proposed Officer Attendance at this Committee Meeting

Graham Jones-Chief Planning Officer

Bill Munro – Section Manager (Forward and Local Planning)

Jessica Farmer – Senior Assistant Solicitor (Planning)

This page is intentionally left blank

UNITARY DEVELOPMENT PLAN ADVISORY
PANEL

5 JANUARY 2004

Chair: * Councillor Burchell

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

* Denotes Member present

PART I - RECOMMENDATIONS

RECOMMENDATION 1 - Replacement Harrow Unitary Development Plan - Major Revisions to Policies and Reasoned Justifications to be included in Proposed Modifications

The Panel received a report of the Chief Planning Officer, which highlighted certain issues not covered in the report submitted to the Panel's meeting held on 12 November 2003. The report before the Panel at its meeting held on 5 January 2004 accordingly suggested revised wording of Policies and Reasoned Justifications and for these to be brought forward as Proposed Modifications to the HUDP. Those recommendations listed at paragraph 6 of the officer report were discussed at the meeting and, where appropriate, individual votes were taken. Details of these are set out in Part II of the minutes below (Minute 75 below refers). Following the votes, the majority of the revised wording of Policies and Reasoned Justifications set out in the officer report were agreed and in some cases, amendments made. These are set out below:

SCHEDULE 6 – CAR PARKING STANDARDS

- Section on Car Parking Standards or Non-Residential Development:

It was unanimously agreed that the words 'Maximum of 1 space per 10 bedrooms **with separately designated parking for employees, visitors and customers**' under C2 Hospitals (see table in the report) should not be deleted;

[Note: Cabinet, at its meeting held on 13 January 2004, was asked to add the bold and underlined point above which was inadvertently omitted from the Chief Planning Officer's Report and was inserted after consultation with Councillors Marilyn Ashton and Burchell.]

MAXIMUM RESIDENTIAL OFF-STREET PARKING

- Section on Car Parking Standards for Residential Development (Class C3: Dwelling Houses)

It was agreed that the word 'private' had been erroneously included in the table and should therefore be deleted;

H6: AFFORDABLE HOUSING AND H7: HOUSING FOR KEY WORKERS AND AFFORDABLE HOUSING TARGET:

- Section on Replacement Affordable Housing Policy H6

That the explanation from the Group Planner as to why the words 'in perpetuity' had not been included be noted and that the following wording be included for approval by Cabinet:

Insert before the final paragraph in the replacement Policy H6 the following wording:-

THE COUNCIL WILL ENSURE, THROUGH THE USE OF PLANNING OBLIGATIONS, THAT THE OCCUPATION OF AFFORDABLE HOUSING IS RESTRICTED TO PEOPLE WHO ARE REGARDED BY THE COUNCIL AS IN NEED OF AFFORDABLE HOUSING.

Add at the end of the policy the wording:-

THE REQUIREMENT SET OUT IN THE LAST TWO PARAGRAPHS ABOVE WILL BE DEEMED TO HAVE BEEN MET IF THE AFFORDABLE HOUSING IS TRANSFERRED TO A REGISTERED SOCIAL LANDLORD APPROVED BY THE COUNCIL.

Within the reasoned justification, include the following wording based on paragraphs 6.36 - 6.38 in the draft replacement HUDP, in relation to occupation:-

Government guidance stresses the importance of retaining the affordability of housing units. Therefore the Council will need to be satisfied that the affordable housing will be available for occupation by those defined by the Council as in need of such housing during the lifetime of the property. The Council will seek the involvement of Housing Associations or RSLs in the management of affordable housing and by the use of Planning Obligations will ensure that developers transfer ownership of a proportion of the site or units to these bodies. Such agencies' continuing interest in the property will ensure control over subsequent changes in occupation.

The Council will expect that appropriate housing development proposals should be managed by RSLs. Where this is not the case, the owners/developers are expected to demonstrate, to the satisfaction of the Council, that the scheme's terms and conditions are at least equal to those administered by the Council or RSLs.

NEW PROPOSAL SITE – BAE SYSTEMS, WARREN LANE, STANMORE

- * Members noted that the site was approximately 35,000 sq m (375,000 sq ft) and that this figure be inserted in the relevant paragraph.

Resolved to RECOMMEND: (to Cabinet)

That the revised wording of Policies and Reasoned Justifications set out in the report of the Chief Planning Officer and for these to be brought forward as Proposed Modifications to the Plan be agreed subject to those amendments set out above.

Reason for Decision: To expedite adoption of the replacement Harrow UDP after completion of all statutory procedures.

[Note: Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear did not support the recommendation in its entirety – Minute No. 75 also refers].

RECOMMENDATION 2 - Replacement Harrow Unitary Development Plan - Draft Proposed Modifications

Resolved to RECOMMEND: (to Cabinet)

That the draft schedule of the Council's Proposed Modifications to the Replacement HUDP be agreed subject to the inclusion of the recommendations set out under UDP Advisory Panel Meeting – Special – held on 12 November 2003 (Minute No. 66 refers) and recommendations 1 (above) and 3 (below) (UDP Advisory Panel Meeting held on 5 January 2004) and for these to be placed on deposit alongside the Statement of Decisions.

Reason for Decision: To expedite adoption of the replacement Harrow UDP after completion of all statutory procedures.

[Note: Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear did not support the recommendation in its entirety – Minute No. 75 also refers].

RECOMMENDATION 3 - Replacement Harrow Unitary Development Plan - Statement of Decisions on the Inspector's Report on the Public Local Inquiry

Resolved to RECOMMEND: (to Cabinet)

That the Council's Statement of Decisions on the Recommendations contained in the Inspector's Report be agreed subject to amendment of the comments under the headings 'LBH Response' and 'Reason for Response' on page 146 of the report relating to Sites of Nature Conservation Importance, and the Statement be placed on deposit subject to the inclusion of the recommendations set out under UDP Advisory Panel Meeting – Special – held on 12 November 2003 (Minute No. 66 refers) and recommendations 1 and 2 (above).

Reason for Decision: To expedite adoption of the replacement HUDP after completion of all statutory procedures.

[Note: Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear did not support the recommendation in its entirety – Minute No. 75 also refers].

PART II - MINUTES68. **Attendance by Reserve Members:**

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

69. **Declarations of Interest:**

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

70. **Arrangement of Agenda:**

RESOLVED: That (1) in accordance with the Local Government (Access to Information) Act 1985, the following agenda item be admitted late to the agenda by virtue of special circumstances and grounds for urgency detailed below:-

<u>Agenda item</u>	<u>Special Circumstances / Grounds for Urgency</u>
12. Residents' health fears and masts – query update to Harrow's policies. (Minute 79 refers)	That it had not been possible to include this item on the agenda as the Member concerned was not certain about its despatch date. Additionally, the Member concerned wished to discuss further the response she had received from the Chief Planning Officer concerning a petition in relation to telephone masts and whether a policy could be included in the HUDP or a report submitted to the next UDP Advisory Panel meeting.

(2) all items be considered with the press and public present.

71. **Minutes:**

RESOLVED: That the minutes of the Special meeting held on 12 November 2003, be confirmed as a correct record and that the signing of the minutes be deferred until printed in the next Council Bound Minute Volume (Vol. 7).

72. **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).

73. **Petitions:**

RESOLVED: To note that there were no petitions to be received at this meeting under the provisions of the Advisory Panel and Consultative Forum Procedure Rule 13 (Part 4E of the Constitution).

74. **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).

75. **Replacement Harrow Unitary Development Plan - Major Revisions to Policies and Reasoned Justifications to be included in Proposed Modifications:**
(Recommendation 1 above also refers).

Those recommendations listed at paragraph 6 of the report were discussed at the meeting and, where appropriate, individual votes taken. Following the votes, the majority of the revised wording of Policies and Reasoned Justifications set out in the officer report were agreed and, in some cases, amendments made. These are marked with an asterisk below.

A - POLICY SH1 – HOUSING PROVISION AND HOUSING NEED

- Section on Housing Provision and Housing Need

Note: (1) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted against the deletion of the words ‘The Borough’s Residents’ and their replacement by ‘Prospective Occupants’;

(2) It was moved and seconded that under criterion E and paragraph 2.81 the words ‘and some low cost market housing as part of a development on a site not suited in particular circumstances for rented provision’ be included after ‘and shared ownership’ accommodation, as suggested in the Inspector’s report (page 128, para 6.51).

Following a vote, this was lost; the Chair having exercised his second and casting vote.

(3) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted for the motion set out in (2) above.

B - T13 & SCHEDULE 6: PARKING STANDARDS AND T14 AND PARA 5.32: NEW DEVELOPMENT AND ON-STREET PARKING

- Section on Replacement Policy T13

Note: (1) Councillor Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted against the inclusion of the word ‘maximum’ in the preamble of Schedule 6 and in the 6th line of paragraph 5.31 of the report;

(2) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted against the inclusion of ‘The reduction in the number of parking spaces is a strong incentive to promoting and seeking alternative modes other than the car’ in paragraph 5.32.

C - SCHEDULE 6 – CAR PARKING STANDARDS

- Section on Car Parking Standards or Non-Residential Development:

Note: * (1) It was unanimously agreed that the words ‘Maximum of 1 space per 10 bedrooms with separately designated parking for employees, visitors and customers’ under C2 Hospitals (see table in the report) should not be deleted; *(the addition of the bold underlined point above, which was inadvertently omitted from the Chief Planning Officer’s Report has been inserted after consultation with Councillors Marilyn Ashton and Burchell and Cabinet has been recommended to agree its inclusion).*

(2) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted against the inclusion of the word ‘maximum’ throughout the table.

- Section on Exceptional Operational Requirements

Note: (1) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted against the inclusion of the words ‘maximum level’ in the 2nd paragraph).

D - MAXIMUM RESIDENTIAL OFF-STREET PARKING

- Section on Car Parking Standards for Residential Development (Class C3: Dwelling Houses)

Note: (1) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted against the inclusion of the words ‘maximum level’ as they considered levels of parking as very low;

* (2) it was agreed that the word ‘private’ had been erroneously included in the table and should therefore be deleted;

(3) Councillors Marilyn Ashton, Mrs Bath and Kinnear wished to be recorded as having voted against the deletion of the following last paragraph under this section - ‘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’.

E - H 5: RESIDENTIAL DENSITY

Note: (1) It was moved and seconded that the statement ‘The Council will expect that

residential densities in new development should be not less than 150 habitable rooms per hectare' be replaced with 'The Council will expect that residential densities in new development should not be more than 200 habitable rooms per hectare or less than 125 habitable rooms per hectare. Following a vote, this was lost;

(2) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion in (1) above;

(3) it was moved and seconded that the following last paragraph under this section be deleted:

'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'.

Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(4) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion in (3) above.

F - H6: AFFORDABLE HOUSING AND H7: HOUSING FOR KEY WORKERS AND AFFORDABLE HOUSING TARGET:

- Section on Replacement Affordable Housing Policy H6

Note: (1) It was moved and seconded that the words 'which should include key worker accommodation, shared ownership and low cost market housing' should be added after 'full range of affordable housing need' in the last paragraph of the preamble to this section. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(2) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion in (1) above.

(3) It was moved and seconded that the figure of '15' be replaced with '25' in the first paragraph of this section. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(4) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion in (3) above.

(5) It was moved and seconded that the statement 'The Council considers that the likely minimum percentage of affordable housing to be negotiated on suitable sites should be 30%, set out under criterion B of the policy be deleted and replaced with 'The Council considers that, where appropriate and only on suitable sites, a percentage of 25% affordable housing will be encouraged'. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(6) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion in (5) above.

(7) It was moved and seconded that an additional criterion (criterion C) be included in the policy as follows: 'The Council will encourage low cost market housing where appropriate'. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(8) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion set out in (7) above.

(9) During discussion on the housing needs of key workers, it was agreed that a copy of a standard Section 106 Agreement be sent to Members of both the Panel and the Development Control Committee and that this should address the concerns about whether property for key workers would remain in perpetuity; the Chair of the UDP Panel be so informed should this not be the case prior to a report being submitted to the Development Control Committee.

(10) In referring to note (9) above, the Chair stated that where there was evidence that a Section 106 Agreement was being flouted, Members should report this to the Chief Planning Officer or the Borough Solicitor for further investigation. The Chair stated that details could be also sent directly to him.

* (11) That the explanation from the Group Planner as to why the words 'in perpetuity' had not been included be noted and that the wording (to be prepared by Officers) be included for approval by Cabinet. This is set out below:

THE COUNCIL WILL ENSURE, THROUGH THE USE OF PLANNING OBLIGATIONS, THAT THE OCCUPATION OF AFFORDABLE HOUSING IS RESTRICTED TO PEOPLE WHO ARE REGARDED BY THE COUNCIL AS IN NEED OF AFFORDABLE HOUSING.

Add at the end of the policy the wording:-

THE REQUIREMENT SET OUT IN THE LAST TWO PARAGRAPHS ABOVE WILL BE DEEMED TO HAVE BEEN MET IF THE AFFORDABLE HOUSING IS TRANSFERRED TO A REGISTERED SOCIAL LANDLORD APPROVED BY THE COUNCIL.

Within the reasoned justification, include the following wording based on paragraphs 6.36 – 6.38 in the draft replacement HUDP, in relation to occupation:-

Government guidance stresses the importance of retaining the affordability of housing units. Therefore the Council will need to be satisfied that the affordable housing will be available for occupation by those defined by the Council as in need of such housing during the lifetime of the property. The Council will seek the involvement of Housing Associations or RSLs in the management of affordable housing and by the use of Planning Obligations will ensure that developers transfer ownership of a proportion of the site or units to these bodies. Such agencies' continuing interest in the property will ensure control over subsequent changes in occupation.

The Council will expect that appropriate housing development proposals should be managed by RSLs. Where this is not the case, the owners/developers are expected to demonstrate, to the satisfaction of the Council, that the scheme's terms and conditions are at least equal to those administered by the Council or RSLs.

- Section on Reasoned Justification

(12) It was moved and seconded that the sentence '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' be deleted from paragraph 2. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(13) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion set out in paragraph (12) above.

(14) It was moved and seconded that the paragraph 4 which states 'Reflecting the government's latest thinking and ...' and ends with 'incorporating 15 or more dwellings' be deleted. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(15) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion set out in paragraph (14) above.

(16) That it be noted that a Member urged caution at the use of the words 'cash-in-lieu' in paragraph 6 of this section.

(17) It was moved and seconded that the following second and third sentences of paragraph (9) of this section be deleted: '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'. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(18) Councillors Mrs Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion set out in (17) above.

(19) That it be noted that a Member was of the view that a number of paragraphs under this section were over prescriptive, that this may prove to be detrimental and may not achieve the desired agenda. She was of the view that these paragraphs did

not provide a proper mix of housing.

G - AFFORDABLE HOUSING TARGET

Note (1) It was moved and seconded that the policy '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' be replaced with 'The Council will encourage an increase in the affordable housing stock by aiming for 165 net additional units in the 10 year period from the adoption of the plan with a particular emphasis on key-worker accommodation in the form of shared-ownership and low-cost market housing where appropriate'. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(2) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion set out in paragraph (1) above.

(3) That it be noted that Members of the Conservative Group on the Panel were of the view that they did not agree with the target set out in this policy.

H - H10: CONVERSION OF HOUSES AND OTHER BUILDINGS TO FLATS AND SCHEDULE 8

Note: (1) It was moved and seconded that the following paragraph which had been deleted should be reinstated:

'That 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'.

Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(2) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion in (1) above because they considered the deletion of the statement as a retrograde step.

I - SCHEDULE 8 – WORKING INTERPRETATIONS IN RESPECT OF POLICY H10 CONVERSIONS OF HOUSES AND OTHER BUILDINGS INTO FLATS

Note: (1) It was moved and seconded that none of the text under this section should be deleted. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(2) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion in (1) above.

J - NEW PROPOSAL SITE – BAE SYSTEMS, WARREN LANE, STANMORE

Note: * (1) Members noted that the site was approximately 35,000 sq m (375,000 sq ft) and that this figure be inserted in the relevant paragraph.

(2) It was moved and seconded that reference to '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' be deleted as a private vehicle would be required in what was an isolated area. Upon being put to a vote, this was lost; the Chair having exercised his second and casting vote.

(3) Councillors Marilyn Ashton, Mrs Bath and Mrs Kinnear wished to be recorded as having voted in favour of the motion set out in (2) above.

(4) The following comments in relation to (2) above be noted:

- (a) That the BAE systems site should be seen in conjunction with other similar sites such as the RNOH redevelopment, where funding could be secured through Section 106 Agreements which could be used to introduce a permanent bus service;

(b) that other measures in sites of this nature were also being examined, such as the provision of a local/convenient shopping facility.

- 76. **Replacement Harrow Unitary Development Plan - Draft Proposed Modifications:**
(Recommendation 2 above refers).
- 77. **Replacement Harrow Unitary Development Plan - Statement of Decisions on the Inspector's Report on the Public Local Inquiry:**
(Recommendation 3 above refers).
- 78. **Annual Monitoring Report:**
The Panel received a report of the Chief Planning Officer, which provided the Planning Services end of year statement for 2002/03 and a commentary on the statement. In particular the report examined performance against key indicators and targets, the knock-on implications for the Planning Delivery Grant for 2004/05, and the implications regarding the 'naming and shaming' of the Council as a 'planning standards authority'. The report also reviewed workload trends and the implications in all service areas of increasing numbers of applications, legislative changes and regional/sub-regional working.

Members noted that the report before them was for information only and that it had already been considered by the Development Control Committee at its meeting held on 10 December 2003.

During the discussion which followed, a Member stated that it was regrettable that Harrow may not receive the much needed funding which was required to improve its performance. She was concerned that Harrow was not being treated sympathetically by central government. She praised the planning staff for having done an excellent job in the face of difficult circumstances.

The Chair also praised the work done by officers.

A Member stated that unless Harrow improves its performance, the Planning Delivery Grant (PDG) would be lost and that he would not want Harrow to go along the path of being 'named and shamed' as the worst performing local authority.

In response, the Chair suggested that a cross party Member-level meeting ought to be held to identify improvements that could be made when the report from the consultant commissioned by the Council, was available.

A Member stated that Members of the Development Control Committee should not be seen as having acted irresponsibly and that any such implications should be rebutted. She added that Members were responsible to the electorate and had a duty to themselves, the planning team and residents and that it was not necessarily easy to make judgements. She added that dealing with the increase in the number of planning applications for extensions to properties was in itself labour intensive and that the general increase in the number of planning applications received combined with the increase in the number of objections received from local residents had had a knock-on effect on performance as a whole.

A Member stated that the real problem had been with the recruitment/retention of staff over the past few years and that she was amazed that the consultant would be looking into the performance of Members. She added that she was also surprised that the report had even been commissioned.

The Chair responded by saying that Members should not pre-judge the outcome of the report and that they ought to await the findings of the consultant.

In praising the staff in both Forward Planning and Building Control Sections for their dedication and commitment, a Member stated that the Development Control Committee should look at ways in which improvements made could be sustained. He added that Building Control too had experienced problems with recruiting staff and that it was no longer acceptable to say that because of the problems in recruitment/retention of staff, it was not possible to improve performance. He acknowledged that planning applications for larger sites were time consuming but added that special meetings had been held to deal with such applications. He suggested a review of the delegated powers in order to improve the situation.

A Member added that Officers had done an admirable job in the circumstances and that she had no issue with Members being assessed by way of the report being

prepared by the consultant. She pointed out that her Group could not support any further extension of the Chief Planning Officers' delegated powers. She added that only 10-15% of planning applications were submitted to the Development Control Committee for decision with the majority being decided by the planning officers.

Finally, the Chair stated that once the report of the consultant was available, a cross party Member-level informal meeting ought to be held should there be any issues that needed discussing further.

RESOLVED: That the report and the discussion, set out in the preamble above, be noted.

79. **Residents' Health Fears and Masts - Query Update to Harrow's Policies:**
Councillor Kinnear, who had requested for this item to be added to the agenda (Minute No. 70 refers), stated that she was not satisfied that criterion E of policy D26 (on pages 122/123) of the replacement Harrow Unitary Development Plan addressed her concerns and requested that a report be submitted to the next meeting of the Panel by the Chief Planning Officer.

In response, the Chief Planning Officer stated that officers in Planning and Legal Services were satisfied that criterion E of policy D26 of the replacement HUDP was adequate and was consistent with the rulings of the Courts. He stressed that health issues were a consideration where the public perception was that health considerations were legitimate reasons for refusing planning applications for telephone masts.

Councillor Kinnear referred to the research carried out on this issue and requested that a review of Harrow's position with a report be submitted to the Panel's next meeting.

The Chair stated that the existing Policy was adequate in dealing with such applications.

RESOLVED: That the discussion, set out in the preamble above, be noted.

80. **Special Meeting of the Unitary Development Plan Advisory Panel:**
Members were advised that a special meeting of the Panel might be necessary should it not be possible for the report setting out objections to the proposed modifications to the HUDP Panel to be submitted to the scheduled meeting on 18 March 2004. The 1 April 2004 was suggested and it was

RESOLVED: That the Committee Administrator be requested to consult Members of the Panel on their availability and confirm the date in writing.

(Note: The meeting having commenced at 7.30 pm, closed at 9.45 pm)

(Signed) COUNCILLOR KEITH BURCHELL
Chair

This page is intentionally left blank

Meeting:	Unitary Development Plan Advisory Panel
Date:	18 March 2004
Subject:	Progressing the HUDP, and preparation for the Local Development Framework in Harrow
Key decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Portfolio Holder for Planning, Development, Housing & Best Value
Status:	Part 1
Ward:	All wards
Enclosures:	Appendix – Definition of Terms and Illustrative Material Relating to Local Development Frameworks

1. Summary

1.1 The Planning and Compulsory Purchase Bill is currently proceeding through Parliament, with Royal Assent still expected in July 2004. The Act will introduce a new approach to development planning, ultimately resulting in replacement of the Unitary Development Plan with what is known as a Local Development Framework (LDF). This report updates the Panel on the progress towards adoption of the replacement HUDP, and the implications of potential delays in its adoption (as a result of the need to be in general conformity with the London Plan), for progressing work on the LDF.

2. Recommendations (for decision by the Portfolio Holder for Planning, Development, Housing & Best Value)

2.1 The Panel is recommended to:

- (i) Note the current position in respect of progress towards adoption of the replacement HUDP, and the implications for the approach to, and timetable for, the production of a Local Development Scheme (LDS) for Harrow.

3. Consultation with Ward Councillors

3.1 Not applicable.

4. Policy Context (including Relevant Previous Decisions)

4.1 The Council has published Proposed Modifications to the replacement HUDP following the receipt of the Inspector's report on objections to the replacement HUDP and the decisions at Cabinet on 13 January. The deposit period ended on 11 March 2004. The London Plan was

published on 10 February 2004. Before the replacement HUDP can be adopted it must be in general conformity with the London Plan (Section 12 (3C) of the Town and Country Planning Act 1990) The Council wishes to proceed to complete the remaining statutory stages in order to secure the plan's adoption as soon as possible, in order that it can then start work on the Local Development Framework.

5. **Relevance to Corporate Priorities**

5.1 The proposed Local Development Framework (LDF), when it is produced, will eventually supersede the replacement HUDP. Although the intention is that future development plans are to be less detailed, the government still intends that they will be central to strategic planning in local authorities, and in particular the Community Strategy. Accordingly, the LDF will relate strongly to the Council's strategic corporate objectives, although most particularly those concerning the environment and developing a prosperous and sustainable economy. Importantly, it will continue to provide the local policy context against which planning applications will be determined.

6. **Background Information and options considered**

Progress towards adoption of the replacement HUDP

6.1 Members have previously been advised of the provisional timetable and statutory stages to be undertaken before the replacement Plan can be adopted. The Proposed Modifications were placed on deposit for a period of 6 weeks from 29th January –11 March, in accordance with that timetable. In order to expedite adoption of the Plan, a special meeting of the Panel has been convened for 1st April 2004 to consider the Council's response to the objections. The timetable envisaged that the decision to adopt would be taken at the Council meeting on 29 April 2004.

Publication of the London Plan, and General Conformity.

6.2 The Panel was advised in the previous report that once the London Plan had been published, the replacement Harrow UDP would have to be in general conformity with it. Until the Mayor issues his opinion that the Plan is in general conformity, the new HUDP cannot be adopted. The Panel was also advised that there were certain matters in the HUDP which were at odds with the contents of the draft London Plan. In order to minimise the scope for possible delay in the UDP's adoption (and subsequent start of work of the LDF), officers undertook informal discussions with GLA officers to inform the preparation of the Proposed Modifications. It was accepted that GLA officers were offering advice in good faith in advance of the publication of the final London Plan, and were not in a position to comment on the content of the final London Plan. During the deposit period informal contact with GLA officers have elicited that it is likely that the Mayor will be asking for further modifications to the Plan to be made before general conformity with the London Plan will have been achieved. At the time of going to press, the Mayor's formal representations on the Proposed Modifications had not been received – the implications of these will be reported verbally at the meeting.

6.3 What constitutes 'general conformity' is not clearly defined, and in recent months GLA officers have been considering this issue, and have undertaken discussions with other bodies with experience in applying the concept. The GLA published a consultation document on this subject in early March (the consultation period being 6 weeks) and officers will be preparing a response. It is, however, clear from the contents of the consultation paper why the GLA officers offered their informal views on why they have initially advised that the HUDP is not likely to be in general conformity.

6.4 Foreseeing that the issue of general conformity was becoming problematic, your officers alerted both GOL and ALG officers of their concerns. They have also maintained close contact with other Boroughs who are at a similar stage in the production of their replacement UDPs. GOL advised that they were not in a position to act and would await the publication of the GLA consultation document. The ALG has responded by calling a meeting of representatives from the Boroughs (Bexley, Camden, Harrow, Lewisham, Westminster) most affected by this issue for late March. In addition, the ALG Leaders' Committee (9th March 2004) was asked to consider a report recommending that Counsel's advice be sought on this issue, as general conformity will affect all Boroughs.

6.5 Clearly the Council will only be in a position to assess what the most appropriate course of action will be when it receives the Mayor's formal representations on the Proposed Modifications. For the reasons set out above, however, it appears highly likely that there will now be delay in the adoption of the replacement HUDP because of the need to publish further modifications in response to the Mayor's concerns. If a re-opening of the Inquiry is deemed to be necessary, that would result in significant delay.

Preparation of a draft Local Development Scheme (LDS)

6.6 Members of the Panel have considered an initial report on the proposed LDS process, and have received copies of the consultation reports published in October 2003 on Creating Local Development Frameworks, including draft PPS 12. For members' information the Appendix to this report contains the definition of terms of the documents which will need to be produced in the LDF. Officers have not yet been able to assess the detailed implications of the new process, and in particular the resource implications. The 3-year LDS Project Management Plan for producing the Local Development Framework will have to detail all aspects of the process, including community involvement, and identify the necessary resources. Planning Delivery Grant allocation for 2005/6 will be in part dependent upon the Authority's performance against its LDS programme, which will be closely monitored by the Government Office for London.

6.7 In order that rapid progress can be made in operating the new regime set down in the Planning and Compulsory Purchase Bill, Boroughs were first asked in a letter from GOL in August 2003 to try to produce draft LDS's by the end of 2003. Clearly for Boroughs such as Harrow, who are at a critical stage in the programmes for their replacement UDPs, GOL has accepted that this was not a realistic expectation. Notwithstanding that, however, the Act will require all Boroughs to have a Local Development Scheme in place by the end of 2004, and an LDF in place by 2007. Officers advise that whilst this deadline will be met, until all outstanding matters on the replacement HUDP have been satisfactorily resolved, it is not yet possible to assess with any degree of certainty what progress will have been made by the end of the year on any of the documents likely to be included in the local development framework.

7. Consultation

7.1 The Government Office for London (GOL) routinely discusses progress on replacement Borough UDPs with officers, and has continued to appraise Boroughs of the latest situation on the Planning Bill, and the implications of the new regime. Members will be kept informed of any significant changes. Clearly the issue of general conformity will be a focal point of discussions. Discussions with GLA officers, the ALG, and other Boroughs will continue to be undertaken with the aim of expediting the adoption of the replacement HUDP.

8. **Finance Observations**

8.1 Whilst there are no financial implications in the current financial year affecting the on-going process to adopt the replacement HUDP, clearly the situation may well change if the Council is required to re-open the Inquiry. No decision on this matter can be made until the representations on the Proposed Modifications have been scrutinised by the Panel. It may also be necessary to seek Counsel's opinion on certain matters. The resource implications emanating from the transition to the new planning regime and its implementation will be considered as part of a future report.

9. **Legal Observations**

9.1 These are included in the report.

10. **Conclusions**

10.1 The main aims of the government in introducing the new planning regime, the Local Development Framework (LDF),

10.2 are to make the planning system more efficient and effective, and in particular to streamline the development plan process. It is clearly most expedient, and reflecting GOL's advice, for Harrow to adopt the replacement HUDP as soon as possible so that it can commence work on the LDF. It is therefore ironic, to say the least, that completion of the remaining statutory stages may well be significantly delayed as a result of the need for the Plan to be in general conformity with the London Plan. It is particularly frustrating that the issue of defining and agreeing what constitutes general conformity is only now being discussed. The Council will still aim to progress work on the Local Development Framework and its constituent documents as quickly as possible. This, however, will be dependent on how much additional work is required to achieve adoption of the replacement HUDP.

11. **Background Papers**

Deposit draft and revised deposit draft Harrow Unitary Development Plans (June 2001 and March 2002)

Planning and Compulsory Purchase Bill

UDPAP report 10 July 2003 – The Changing Approach to Planning

12. **Author**

Dennis Varcoe – Group Planner – Forward and Local Planning (020 8424 1460) or dennis.varcoe@harrow.gov.uk

DEFINITIONS OF TERMS AND ILLUSTRATIVE MATERIAL RELATING TO LOCAL DEVELOPMENT FRAMEWORKS

The following information is extracted from Annex A of draft Planning Policy Statement 12- Local Development Frameworks

The development plan: will consist of regional spatial strategies (spatial development plans in London) and development plan documents contained within the local development framework.

Regional spatial strategy (RSS): will be prepared by the regional planning body. The regional spatial strategy will set out the policies in relation to the development and use of land in the region and will be approved by the First Secretary of State. In London, the spatial development strategy prepared by the Mayor will be the equivalent of RSS and GOL Circular 1/2000 provides advice in respect of the spatial development strategy. Planning Policy Statement II on Regional Planning provides detailed guidance on the function and preparation of regional spatial strategies.

Local development framework (LDF): will comprise a portfolio of local development documents which will provide the framework for delivering the spatial planning strategy for the area.

Local development scheme (LDS): will set out the programme for the preparation of the local development documents. All plan-making authorities – district councils, unitary authorities, national park authorities broad authority and county councils (in respect of minerals and waste local development documents only) – must submit a local development scheme to the First Secretary of State for approval within six months of the commencement date of the Act regardless of where they are in terms of their current development plan. The transitional arrangements allow for existing adopted plans to be saved for three years from the date of commencement of the Act and for unadopted plans to be saved for three years post adoption.

Local development documents (LDD): will comprise of:

- i. **Development plan documents (DPD):** prepared by the relevant plan-making authority. They will be spatial planning documents and subject to independent examination. There will be a right for those making representations seeking change to be heard at an independent examination;
- ii. **Supplementary planning documents (SPD):** will cover a wide range of issues on which the plan-making authority wishes to provide policy guidance to supplement the policies and proposals in development plan documents. They will not form part of the development plan or be subject to independent examination;

- iii. **Statement of community involvement:** will set out the standards which the plan-making authority intend to achieve in relation to involving the community in the preparation, alteration and continuing review of all local development documents and in significant development control decisions, and also how the local planning authority intends to achieve those standards. The statement of community involvement will not be a development plan document but will be subject to independent examination. A consultation statement showing how the local planning authority has complied with its statement of community involvement will be required for all local development documents.

Development plan documents: the development plan documents which local planning authorities must prepare include:

- i. Core strategy;
- ii. Site specific allocations of land;
- iii. Area action plans (where needed); and
- iv. Proposals map (with inset maps, where necessary)

Development plan documents may form one document covering a range of policy areas or a number of individual documents. Individual development plan documents or coherent parts of a single development plan document will be able to be reviewed independently from other development plan documents. Taking each in turn:

- i. **Core strategy:** will set out the long-term spatial vision for the local planning authority area and the strategic policies and proposals to deliver that vision. It will contain a set of primary policies for delivering the core strategy. Broad locations for development may be set out in a key diagram;
- ii. **Site specific allocations and policies:** allocations of sites for specific or mixed uses or development will be contained in development plan documents. Policies will identify any specific requirements for individual proposals;
- iii. **Area action plans (AAP):** will be used to provide a planning framework for areas of change and areas of conservation; and
- iv. **Generic development control policies:** will be a suite of criteria-based policies which are required to ensure that all development within the area meets the vision and strategy set out in the core strategy.

Strategic environmental assessment/sustainability appraisal: Strategic environmental assessment (SEA): a generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. The European 'SEA Directive' (2001/42/EC) does not in fact use the term strategic environmental assessment; it requires a formal 'environmental assessment' of certain plans and programmes, including those in the field of planning and land use.

Local development framework illustrative material

Key diagram: diagrammatic interpretation of the spatial strategy as set out in the core strategy. This is a device which some authorities may wish to use to enable them to illustrate the broad strategy for the area in a similar fashion to existing structure plan's key diagrams. It is most likely to be appropriate to an area of significant change where the general location of broad areas of future development can be identified together with linkages between such areas and the relationship to other strategies and neighbouring areas. Broad areas of protection/little anticipated change can also be shown.

Proposals map: the function of the proposals map is to illustrate the policies and proposals in the development plan documents and any saved policies which are included in the local development framework. It will be an Ordnance Survey based map at a scale which allows the policies and proposals to be illustrated clearly in map form. The proposals map may show any of the following elements where these are reflected in the policies and proposals of the development plan (*list is not exhaustive*):

- key policy areas i.e. the areas to which the core strategy policies will apply such as:
 - allocations of land for major development such as urban extensions;
 - key linkages such as public transport corridors and the road distribution system;
 - location of major multi-modal interchanges; and
 - nationally designated areas such as AONB, SSSIs Green Belts and Metropolitan Land etc.
- areas to which detailed policies and proposals in the development plan document may apply such as:
 - areas subject to specific design initiatives (such as high buildings policies);
 - areas where flooding issues will need to be addressed (flood risk areas);
 - areas where accessibility for non-car modes will be improved;
 - areas subject to any demand management proposals;
 - areas subject to specific density policies;
 - areas of more regional or local importance for biodiversity and where biodiversity will be enhanced e.g. through the use of planning obligations;
 - areas of potential land contamination where investigation and remediation measures may need to be taken;
 - areas which have been declared as air quality management areas;
 - areas where specific initiatives will be encouraged such as rural employment initiatives, vacant homes initiatives etc;
 - areas subject to security initiatives (designing out crime);
 - areas of protected views; and
 - areas relating to hazards such as flooding, land instability and contaminated land.

- areas where policies will be seeking to co-ordinate the delivery of community facilities to assist regeneration and the achievement of sustainable communities (such as health/education/social facilities) – these areas are likely to be subject to area action plans;
- major regeneration/conservation areas including areas subject to community or social initiatives that are the subject of area action plans. These may be illustrated in detail on inset maps. They should be cross referred to the relevant strategic policy in the core strategy which will set the parameters of the area action plan e.g. the number of houses to be included within any mix of development, or the scale and mix of commercial development sought in a particular regeneration scheme etc;
- detailed land allocations arising from the policies and proposals in the development plan document for those areas where there is no area action plan proposed;
- the retail hierarchy where this is relevant to the core strategy;
- rural areas where economic/social initiatives will be sought/supported/co-ordinated;
- In relation to minerals and waste development plan documents the following will need to be shown on the proposals map:
 - areas of significant mineral resources subject to safeguarding policies and minerals consultation areas;
 - safeguarding of areas for mineral working, handling and for recycling;
 - areas of search and preferred areas for waste management development and mineral working (including allocations of secondary aggregates);
 - railheads and wharves safeguarded for bulk transportation (including minerals and waste);
 - land allocated for recycling of construction and demolition waste;
 - areas safeguarded and subject to groundwater protection;
 - consultation areas relating to hazards such as flooding, land instability and contaminated land; and
 - areas designated for the protection of the aquatic environment.

The proposals maps prepared by district councils must include safeguarded areas, minerals consultation areas and any minerals and waste allocations included in a county minerals and waste development plan document.

The proposals map should cross-refer to relevant policies in the development plan document and may set out the essential land use elements proposed to be included in the areas identified for proposed areas for development. Where inset maps will provide greater detail the area covered by the inset map should be shown on the proposals map.

Meeting:	Unitary Development Plan Advisory Panel - 18 th March 2004 Development Control Committee – 17 th March 2004 – For Information Only
Date:	As above
Subject:	Harrow School Conservation Area: Draft Conservation Area Character Study Including Planning Policies
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Portfolio Holder for Planning, Development, Housing and Best Value
Status:	Part 1
Ward:	Harrow on the Hill
Enclosures:	Appendix 1 – draft character study

1. Summary

- 1.1 This report introduces a draft Conservation Area Character Study for the Harrow School conservation area, produced after a comprehensive review of the area. It is proposed that this document is now made the subject of a public consultation process.

2. Recommendations (for decision by the Portfolio Holder for Planning, Development, Housing and Best Value)

- 2.1 That the Panel recommends that the Portfolio Holder:

Agree the contents of the draft Harrow School Conservation Area Character Study, including the proposed planning policies and proposals for the conservation area, Appendix 2 of this report, for public consultation purposes;

REASON: In order to fulfill the Council's obligation under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which carries the continuing duty that every local planning authority is to consider whether it should designate and review the boundaries of conservation areas from time to time.

3. Relevant Previous Decisions

- 3.1 The Harrow School conservation area was designated in 1968.

4. Relevance to Corporate Priorities

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

5. Background Information

5.1 The draft study includes information on the history, archaeology and development of the area, analyses what gives it its special character and appearance and sets out policies for its protection and proposals for its enhancement. The draft study is attached as Appendix 1. There are a number of historic photographs in the study and we would propose to replace some of these with modern images of some more of the key buildings in the area, such as the Vaughan Library and Harrow School Chapel.

6. **Consultation**

6.1 This report seeks to agree public consultation for the character study. The study will be distributed to local amenity groups, the members of CAAC, English Heritage, Harrow School, St Mary's Church and residents and their comments invited upon the study. There will be a period of consultation of at least 3 months and following this a meeting with interested parties will take place in order to discuss the study. Changes to the document following the consultation will be made and reported back to the UDP Advisory Panel in order to progress the document towards adoption as SPG by Cabinet.

7. **Finance Observations**

7.1 None

8. **Legal Observations**

8.1 None

9. **Conclusion**

9.1 In summary it is considered that the draft Conservation Area Character Study will encourage a greater understanding of the area and lead to better informed planning decisions. The draft study should be the subject of public consultation.

10. **Background Papers**

10.1 None.

11. **Author**

11.1 Amy Burbidge, Principal Conservation Officer
Room 320, Extn 2467.

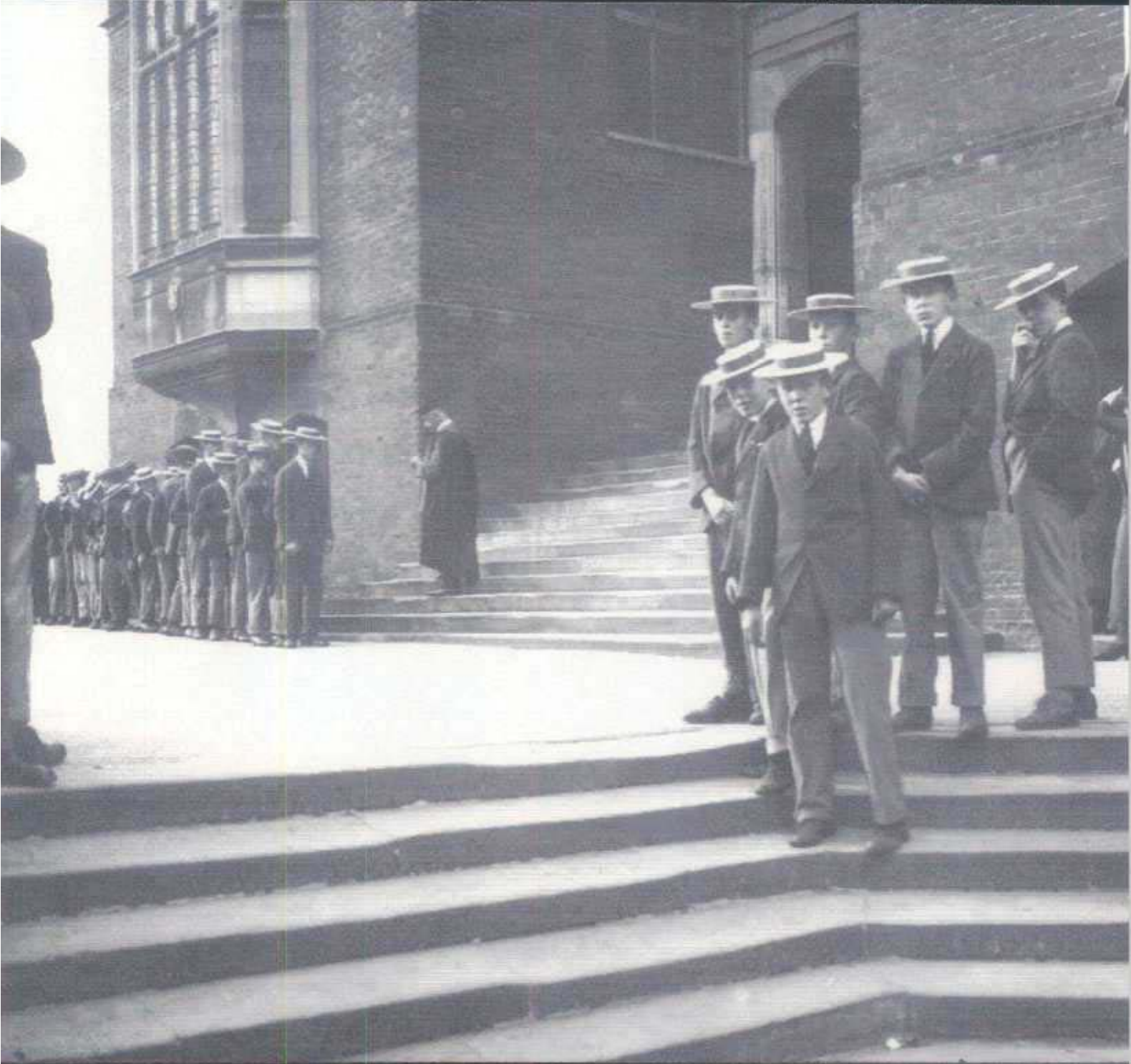
HARROW SCHOOL

Appendix 1

Draft

CONSERVATION AREA STUDY

Area Number 7



The Harrow School conservation area is a unique part of Harrow, and contains buildings that are some of the most well known in the area. St Mary's Church, which sits atop the hill, is visible from all over the Borough. Just below it, the rooftops of Old Schools and Harrow School Chapel are also visible. Large, dramatic school buildings almost exclusively fill the conservation area. The topography of the Hill and the quality of the buildings combine to make this area particularly striking.

LOCATION

The Harrow School conservation area is one of 8 conservation areas on the Hill and was first designated in 1968. It lies at the northern end of the High Street and includes Church Hill, Peterborough Road, Football Lane and Grove Hill.

ARCHAEOLOGY, HISTORY AND DEVELOPMENT

Little is known of the Hill's early history, although it is probable that it was an important place of pagan worship. In 767 first mention of it is made when Offa, King of Mercia, exchanged his lands in Harrow for land in the Chilterns. In 825 the Archbishops of Canterbury gained control of the Manor of Harrow and this link was to continue for the following 700 years.

There was certainly a church by 1086, since a priest is mentioned in the Domesday Survey. In 1087 Arch Bishop Lanfranc formally founded St Mary's Church. A small village would have become established around the Church. As labourer's cottages and shops gradually increased a more developed High Street would have emerged. From 1261 a weekly market started in Harrow on the Hill, showing that the village was becoming more of a commercial centre. The Lords of the Manor probably lived at a manor house on the site of The Grove. Evidence of earth banks within the grounds have been examined by archaeologists who think that they may have been fish ponds, used for carp. Fish ponds were common around medieval manor houses, but the steep hillside location would have meant that their construction here would have been more complex, indicating that this manor was sufficiently wealthy and important to bother building them. A well was also found in the grounds of the house, which was apparently lined with Purbeck stone, again showing the high status of its occupants. In Church

Fields, where there is terracing, other archaeological investigations have shown that these were medieval, or possibly earlier, plough runs where terraces were created to make it easier for a team of oxen and a plough to run along.

The foundation of Harrow School in 1572 by John Lyon was to change the character of the town from then onwards. Lyon paid for the education of 30 boys in a local church, but in his will and via a Royal Charter, obtained in 1471, Lyon made provision for his own free school for boys in Harrow. Boys were probably taught initially at Flambards (on the site of 27-42 London Road) until in 1615 when Old Schools was built with more funds from the Lyons family. The building of Old Schools affected the layout of the roads since previously, the High Street had gone straight up Church Hill to the churchyard and then descended via a lane known as The Fosse, but after the School's establishment, the High Street was extended with a road called Lower Church Street, on the route the High Street now follows.



St Mary's Church 1902

The School gradually expanded so that by 1682, there were 120 pupils and by the 1770s numbers had risen to more than 230. Pupils originally boarded in separate private houses but this gradually became regularised with the

Grove House





Church Fields 1928

establishment of houses under the control of Dames. These were not owned or managed by the School but were linked to it. For instance, in the early 1800s a Dame called Mrs Leith has 35 boarders living at St Mary's Vicarage with her. The house of Mrs Armstrong, another Dame, was on the site of the War Memorial building. As the School expanded so did the village, so that by the mid-18th century, the High Street consisted of a continuous frontage of buildings between the churchyard and the junction with West Street and beyond.

Under Dr Joseph Drury the School's numbers reached 345 and produced 4 prime ministers. The school staged a revolt on Drury's retirement in 1805 which was led by Byron. The plan was to dynamite the walls of Old Schools but was stopped when some boys appealed for their preservation since the names of so many of their fathers were carved on the walls. In 1819-20 CR Cockerell added a balancing wing to Old Schools and created the twin crow-stepped gables that give it such an exciting skyline. After 1820 the School bought The Grove as another boarding house, but it caught fire and had to be substantially rebuilt. In 1838 the original mid 17th century Head Master's house burnt down. In 1838-9 Cockerell was employed again to build a new school chapel to accommodate the additional boys, but in fact the numbers of boys had dropped to 70, partly due to the lack of accommodation after the loss of the Headmaster's house. The replacement Headmaster's house, which was constructed in 1840 and was designed by Decimus Burton, is still in use today.

The control of the Dames over boarding houses gradually depleted as Masters realised they could supplement their income by buying large houses and letting them out to boarders. This was a more manageable system for the School since the Masters were able to exert more discipline over the boys and

so by 1841 the Dames were no longer in control and all the houses were run by Masters.

The period 1859-1884, covering the headmastership of Dr Butler has been described as a Harrow Renaissance. There was a huge burst of building and Harrow established itself as the leading rival to Eton. Key school buildings such as the Chapel, Speech Room and many of the boarding houses were built in Butler's time. The growth of the school led to additional developments within the whole town. New cottages for Harrow School employees were built. The School was the main draw to Harrow, but also the Hill's elevated position was widely believed to be linked to health and wellbeing and would have attracted residents. However, there was still no proper drainage and so waste just ran down the hill. The number of municipal buildings on the Hill increased including a post office, council offices, cottage hospital and these adopted similar styles to school buildings, and

sometimes the same architects. From 1850 there was gas lighting in the streets and from 1881 the streets were fully paved.

In the early 20th century the High Street was flourishing with the particular predominance of the medical profession, such as the medical firm of Bindloss and Lambert. Shops extended from the top of West Street to the yard outside Old Schools but in 1922 the shops between Druries and top of West Street were demolished, Harrow Stores was established and the lawn outside Druries created.

In 1926 the War Memorial building was opened to commemorate the 2917 Harrovians who served in the First World War, 690 of whom were injured and 644 were killed. The Speech Room was the only major School building to be hit by a bomb in the Second World War in 1940.

In the latter half of the 20th century,

Gentlemen's outfitters on left demolished to make way for garden



the School has continued to expand. Two new boarding houses, the Copse (1960) and Peterborough House (1980) have been constructed and the Maths and Physics Schools and Dining Room were built in the 1970s. In 1994 the Harrow School Theatre was built within the Conservation Area.

TOWNSCAPE CHARACTER

The topography is the area's most striking feature, giving rise to dramatic views of the buildings, often seen staggered one above the other and views up and down the hill and panoramic views out. The topography and road layout together create a real sense of place. Generally, in common with the rest of the Hill, the lower status and smaller buildings are located on the lower slopes and as one ascends, the buildings become both larger and more impressive.

Views are afforded of St Mary's, at the summit of the Hill, but also of other focal points such as the tower of Speech Room, viewed on the ascent up Grove Hill. Glimpses out, to the surrounding landscape, can be caught between buildings, such as around the

School's Chapel, which all add interest to the streetscene. There is also the Byron Viewpoint, a formal viewing platform, where panoramic views to the west can be seen. Within the School's private areas, there are striking views, particularly those out to the east from the terrace to the rear of the Chapel. The view up Church Hill, with the historic buildings framing the scene is particularly impressive.

The streetscape and landscape is varied, even within this relatively small area. In the central, core area of the School, the character is urban, with many buildings fronting directly on to the pavement. The buildings are densely packed into the small space and are all large and of several storeys giving an enclosed and dramatic character to the townscape. The majority of the buildings belong to Harrow School and this gives this conservation area its unique campus feel. They were built to set the tenor of the School and give a real sense of drama and formality to the streetscape. As many of the buildings were built over a short period of time, with repeat commissions of a limited number of architects, the area has coherence in architectural style even though it is

made up of individual monolithic set pieces.

However, there are some substantial spaces around the buildings allowing glimpses around them and adding to their setting. These open spaces tend to be formal gardens, or paved squares, which also contribute to this urban character. The steps outside War Memorial, for instance, provide a large area of open space forming a useful transition space between the different levels of the High Street and Church Hill, and are urban and formal in their style. The garden outside the Vaughan Library is set within the confines of the buildings around it and is symmetrical, but the slightly wild forms of the magnolias planted there contrast this formality. Elsewhere within this core area, planting softens and adds interest to the streetscene, particularly the thick ivy growing up Speech Room wall and the yew hedge outside the Chapel. Behind the Chapel are formal gardens, which act as a foil to the built form fronting the street.

Lower down the slopes of the Hill, the character changes. After passing through the pinchpoint of buildings between Speech Room and New Schools, Peterborough Road curves and broadens out. The buildings are still large and impressive, but are set further apart, within gardens and set back from the roads. Boarding houses predominate on Peterborough Road. Whilst still clearly institutional, they do have a different character to the teaching blocks around Headmasters being set within large gardens and surrounded by trees. They do have the vertical emphasis found elsewhere in the conservation area including features such as the 'turret' on the Knoll. The changes in gradient both up and down the hill, but also across the road adds to the visual interest. On Grove Hill smaller buildings such as Elmfield Cottage, which has a much more cottage and

View north down Peterborough Road



residential character, or Art Schools which are converted stables and therefore reflect their lower status as service buildings, form a pleasing contrast to the central area of the School.

In addition on parts of both Grove Hill and Peterborough Road, only the east side of the road has buildings fronting onto it, the other being the rear boundaries of gardens. The open spaces are much less formal than those higher up the Hill, usually being simple gardens or scrub undergrowth and this gives the area a softer character. The feeling of enclosure is retained, despite the lack of buildings, because on Peterborough Road, there are fences and walls surrounded by thick planting and on Grove Hill, the open space on the west side of the road is filled with scrub planting, and rises steeply back from the road. The street trees, particularly on Peterborough Road, make an immense contribution to the character of the street, giving a real sense of entrance to the Hill through their tunnel of greenery. Glimpses of the rear elevations of the boarding houses on Grove Hill are visible from Peterborough Road, and are of remarkably high architectural quality given that they are not the principal elevations.

Smaller roads leading off from Peterborough Road and Grove Hill also add to the character of the area. Football Lane begins with a short,



St Mary's from across Church fields in 1928

straight and very steep road which is surrounded by substantial teaching blocks, culminating in the listed Music School and a large tree. This area still feels very urban and imposing buildings loom over the road. However, beyond the Music School, Football Lane peters out to a small track continuing straight down to open fields and lined with hedgerows rather than buildings. This sudden change between densely built urban form and open green space is one of the key features of the conservation area. Similarly Garlands Lane (formerly Rifle Range Lane) begins with the imposing Victorian School buildings which front

on to Peterborough Road but soon takes on a much less formal and more rural character as it is lined with trees and hedges. These semi-rural tracks lead to the School's playing fields.

Around St Mary's, the character of the area is again quite different, distinct from the campus architecture beneath it. It is a serene area even though it has well used footpaths crossing the churchyard. The churchyard itself has a mix of scrub planting and more tended lawn areas, which acts as a useful transition between the urban landscape lower down Church Hill and the open, semi-rural spaces of Church Fields. The Church Fields are a unique and lovely green, open space, through which there are footpaths. They also form an attractive setting to the buildings further up the Hill, when viewed from further away.

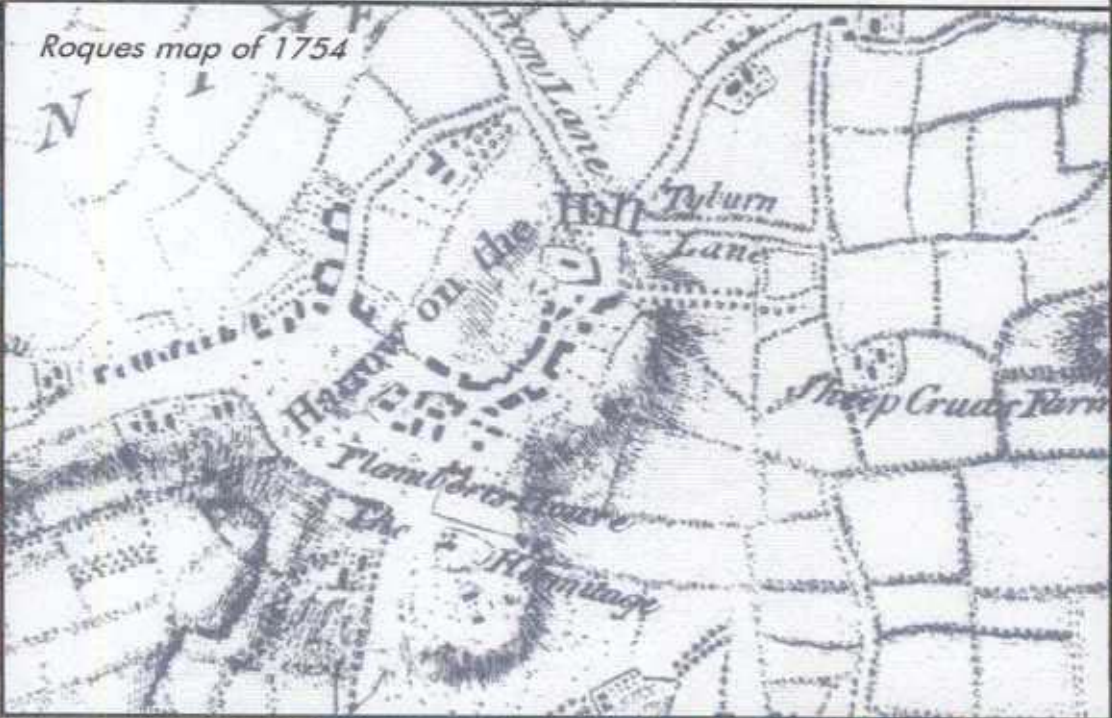
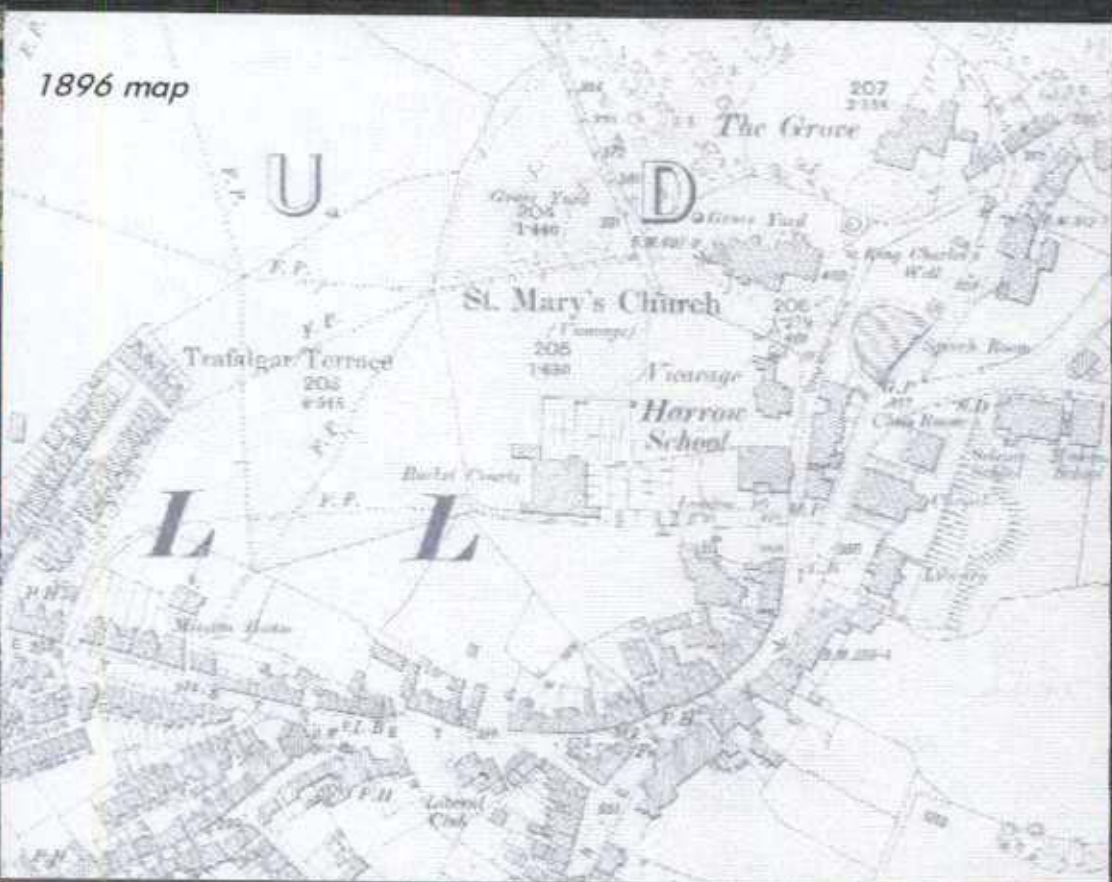
The predominant building materials throughout the conservation area are red and yellow brick with quoins and dressings picked out in stone or black brick. Roofs are of slate or clay tile. The windows are generally timber sashes although there are some timber casements on the lower status buildings further down the Hill.

The similar style of boundaries of the School buildings helps to visually tie the area together often with attractive red and blue brick walls or iron railings mounted in stone sills. The curving flint wall to Rendalls is a particularly charming boundary and is picked up in

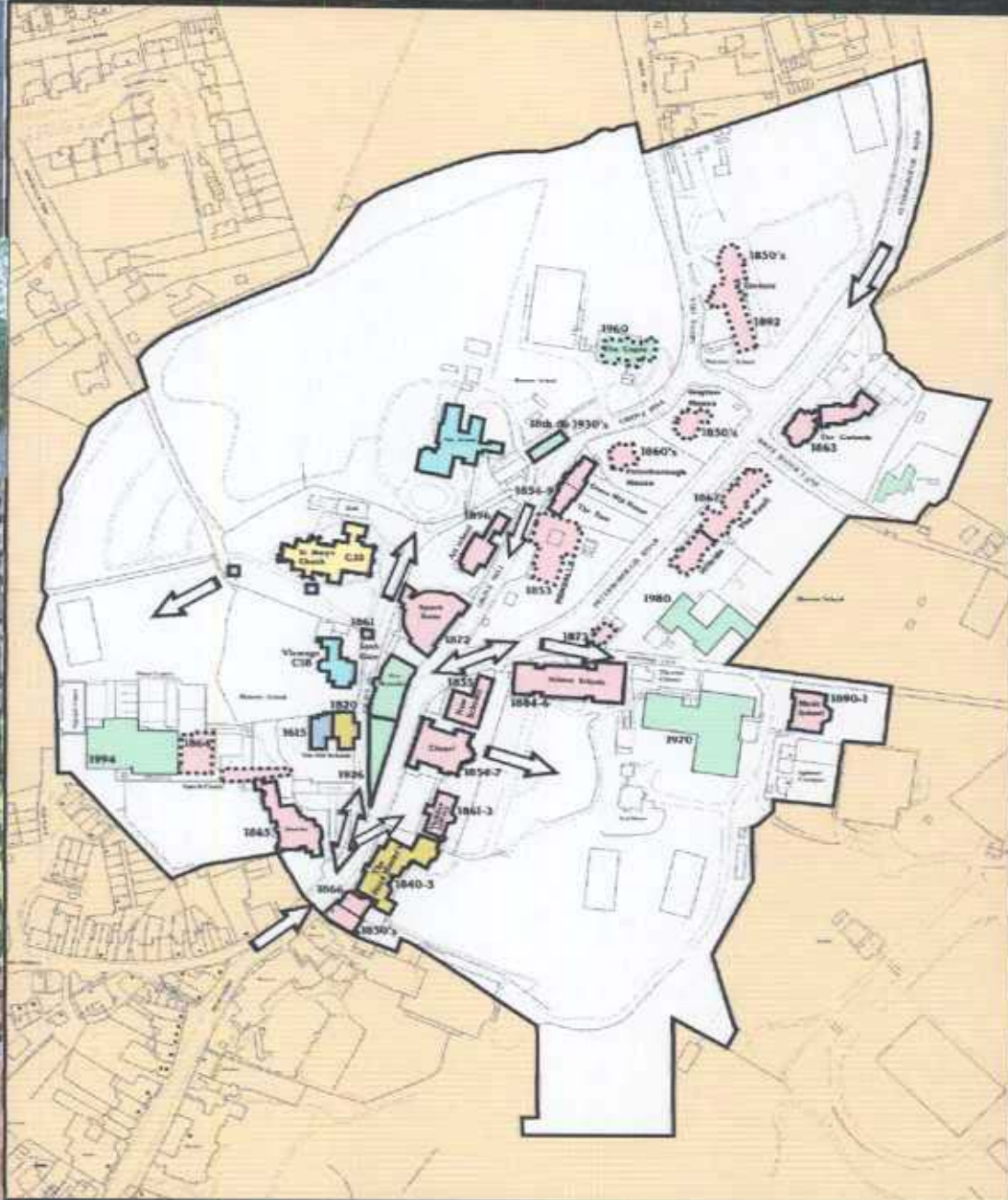
Tobogganning on Church Fields in the '50s













HARROW SCHOOL



HARROW SCHOOL



Harrow School Conservation Area.
Map showing Listed & Locally Listed Buildings and their Ages

- | | | |
|--|--|---|
|  Conservation Area Boundary |  12th century |  1850-1900 |
|  Locally Listed |  17th century |  1901-present |
|  Statutorily Listed |  18th century |  Important views & vistas |
| |  1800-1849 | |



the more dramatic stone and granite walls of Speech Room, again giving the area coherence.

ARCHITECTURAL CHARACTER

St Mary's is the earliest building within this conservation area dating from the 12th century and sitting at the summit of the Hill, it is the most visible building, acting as an emblem of the Hill itself. The west tower is Norman and the chancel and nave are 13th century. Major restoration and reconstruction was undertaken by Gilbert Scott in 1846. In common with many other churches around the country, the Victorians were keen to effect improvements or undertake restoration of their buildings. The churchyard of St Marys contains several listed tombs and the listed lychgate. The Peachey Tomb is the most famous grave in the churchyard because it is noted as the place where Byron composed some of his early verses, later referred to as "my favourite spot". It is protected by a cage which was installed after Byron's fans kept trying to take mementos of the stone away.

The School buildings are an impressive combination of boarding houses and key teaching buildings. Of these

architectural set pieces, and set high on the Hill is Old Schools. It is the earliest wholly brick structure in Middlesex and was originally used both as Headmaster's residence and schoolrooms. Given architectural strength by its geographical position high up the slope and by its dramatic crow stepped sky-line, Old Schools provides a focus for the central area of the School.

The School expanded rapidly during the 19th century, and most of the buildings are either wholly Victorian or were remodelled at this time. Even Old Schools is partly 19th century since the eastern half dates from 1818-20. This rapid growth of the School created a group of buildings, concentrated within a very small area, by some of the outstanding architects of the period forming a remarkable example of late 19th century development. It is for this reason that in 1886 and 1892 the Architectural Association chose Harrow as the subject of tours to places of special architectural interest. Also, because the area was developed within a short space of time and because a handful of architects received repeat commissions, the buildings have a similarity in scale, materials and detailing which helps the whole area to

have coherence. Many of the architects were Old Harrovians and had an empathy with the School and area.

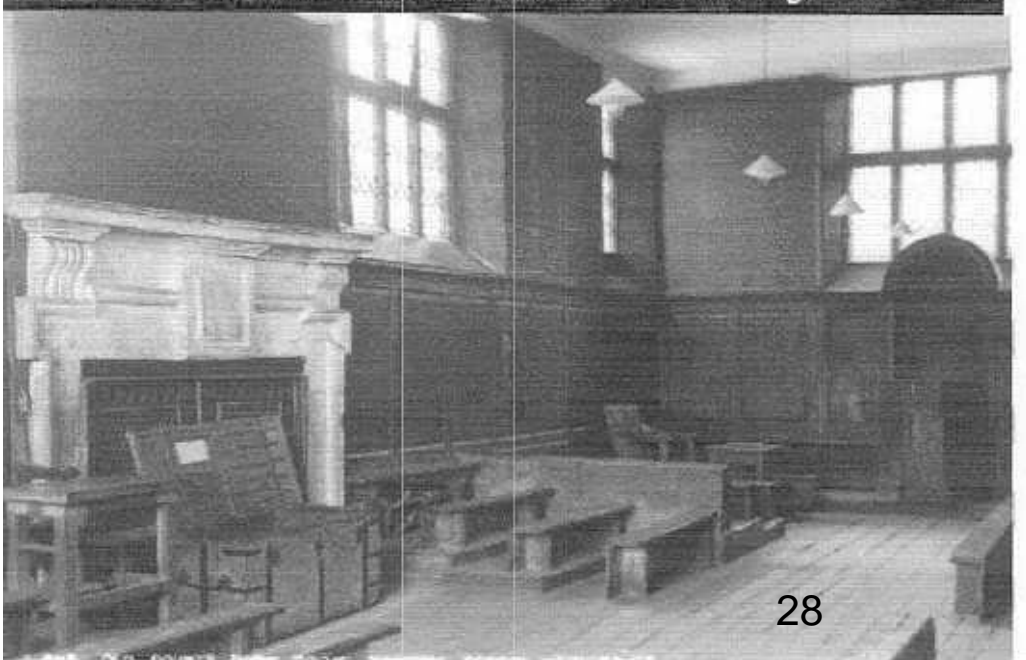
The most prolific architect of this period for the School was CF Hayward. His exuberant Victorian building style dominates on much of the approach to the summit up Peterborough Road. Amongst his works are Garlands (1863), the Knoll (1867) and Druries (1865). Garlands was considered by Pevsner to show 'the overwhelmingly Public School style at its most concentrated'. The boarding houses are very similar in their robust style and scale employing red and yellow brick with stone quoins or black bricks for definition, slate roofs, timber sash windows and high quality craftsmanship.

George Gilbert Scott was involved in 3 key buildings on the Hill; St Mary's restoration, the School Chapel and the Vaughan Library. The chapel was built in 1854-6 and has created the familiar view of the larger and smaller spires atop the hill with the brightly coloured roof of the Library adjacent.

New Schools, by F Barnes, was built in 1855 on a site where there had been a large rectangular pond, which had been filled up with the excavations from the Chapel, allowing the area to be redeveloped.

The new buildings were not admired from all quarters. George Russell in his autobiography "One Look Back" declared that Dr Butler, with "a 100 gifts and accomplishments had no aesthetic or artistic sense and, under his rule, the whole place was over-run by terrible combinations of red and black brick and the beautiful view from the school yard...was obstructed by some kind of play shed with a little spout atop- the very impertinence of ugliness". This of course refers to Speech Room built in 1874-7 by William Burges. Burges was a

The Fourth Form inside the Old Schools building





St Mary's Church around 1908

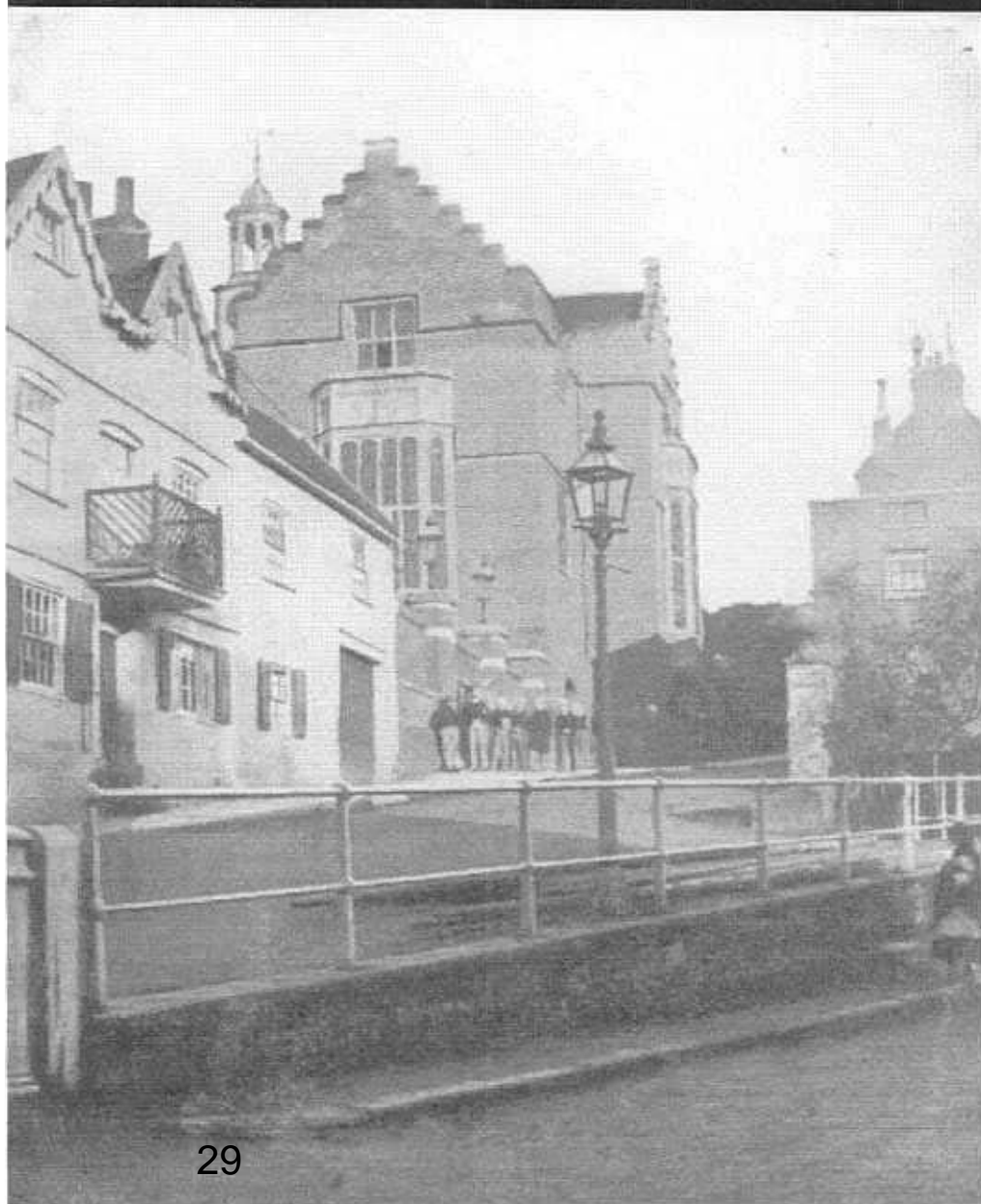
controversial architect to choose. He had a reputation as a bold innovator with an individual vision. His design was forced upon the building committee of the school by the Chairman, AJ Beresford-Hope; this and further negotiations caused the resignation of all the original members of the committee. Massive amounts of earthworks had to be undertaken and pile driving undertaken for the building. The excavated soil was however used as the foundations for the beautiful terraced gardens behind the chapel and library. Speech Room was never completed as Burges had planned, but it remains one of the most interesting of his relatively few works. It is also an example of his use of cast iron - the roof is carried on cast iron pillars and above it metal trusses radiate from a central drum. The towers were added in 1919 and 1925. Speech Room also dominates the School campus, and its north tower is visible in views up Grove Hill.

Other famous architects involved in school buildings included Basil Champneys who designed the Museum Schools (1886) in a Norman Shawian "Queen Anne" style. Its external staircase is a distinctive feature, much admired by contemporary critics, which was devised so that access to the top storey - the museum itself- could be gained without inconvenience to the classrooms on the ground and first floors. ES Prior, who trained at Norman Shaw's office, designed the new Music School in 1891. In describing Prior, Goodhart Rendel thought him a 'rogue architect' and cited the Music School as the supreme example of "what he could do in this way, when really roused...".

The War Memorial forms an effective link between the Old School and Speech Room, Chapel and Library. It was a difficult site for a new building which needed to be an impressive monument and yet not overpower the surrounding groups of buildings, but the building is both dignified and imposing.

Other smaller school buildings break up the monolithic structures around and, in doing, add interest and character to the streetscene. The Old Music School at the top of Football Lane employs similar materials, brick and tile, to the boarding houses nearby, but because it is a low building, set into the steep hillside, it has a different and more humble character. Elmfield Cottages are simple, vernacular buildings with a shallow pitched slate roof.

Dame Armstrongs House in front of the Old Schools



STREETSCAPE

In the core area around War Memorial building, some of the pavements are of black or pink tarmac. Pavements inside the school are in York stone and some of the tarmac has been recently replaced with York stone to match. Kerbs are in granite, some of it pink, which adds colour to the street, whilst others are particularly wide, such as those on Church Hill, and should be kept. Reproduction lamp standards are used throughout the area, which tie in well with the buildings and also give the streetscene coherence. Elements of Harrow School owned land or buildings are perceived to be part of the public realm, such as the lights on the walls of War Memorial steps and Old Schools or the fan-laid cobbles at the entrance to Druries, and the quality and variety of these adds immeasurably to the attraction of the streets. Built into various walls around the conservation area are stone plaques and unusual signage which all forms part of what makes the area distinct. Some of these are illustrated on the inside face of this document. At

the bottom of Grove Hill, unusual dark blue ceramic pavers survive, and in some instances granite or other stone kerbs, which should be retained. The successful illumination of St Mary's adds to both the immediate area and farther afield at night.

ASSETS

Outstanding quality of architecture

- Interesting form and grain to the townscape reflecting its use by the School
- Well maintained private buildings and open spaces
- Dramatic topography with changing levels and directions
- Large number of attractive long and short views including long distance panoramas
- Compact, detailed street scene ranging from small scale and lower status to large scale formal
- Interesting locally distinct plaques, street surfaces etc which add to the character of the street.

The Headmasters House 1901



PROBLEMS AND PRESSURES

Cars and traffic are a perennial problem on the Hill. The historic roads were not designed to take the amount of traffic and parking which now is part of normal life in any town. Large numbers of cars parked on the roads and on open space do nothing to enhance the character of the area. There are also the separate concerns of Harrow School over their pupils' safety. In addition, Highways clutter in connection with roads can detract from the quality of the streetscene. There is local support for a reduction in speed limits and efforts have been made to reduce speeds and increase visibility for pedestrians in the form of new road narrowings. It will be vital that any additional traffic safety works use high quality materials and that clutter is kept to a minimum.

In general, the quality of the buildings is not matched by a quality of materials and design in the public realm, although attempts at addressing this are being made. The tarmac is badly patched and breaking up. Guard rails around the High Street are not attractive. Street furniture, such as bins and salt bins are often ill-placed and of poor design. Historic street surfaces, such as cobbles outside the Vicarage have been covered over to the detriment of the street. Within the churchyard, the use of tarmac for the paths seems a missed opportunity, given the quality of the architecture of the church and of the open space. The paths through Church Fields are broken and dark, which in combination with the thick tree screen can make the area feel intimidating. Reproduction heritage lampposts are used successfully on the High street and



Along the High Street towards the School

Peterborough Road, but ordinary, less attractive street lights exist on Grove Hill, which would it would be beneficial to replace.

The "campus" character of the conservation area is intrinsically linked to the use of the area by Harrow School. The vitality brought to the area by the hordes of boys using it, the quality of the buildings and the School's commitment to properly maintaining them and the character of the area are dependent on the School being in the conservation area. However, there are inevitable conflicts between the School's need to expand and provide facilities for pupils and the environment. Much of the open space around the School buildings is designated as Metropolitan Open Land and a significant number of their buildings are listed. Managing change and continuing to work with the School will be essential in the future.

Having said that, with buildings of such quality it is surprising that not more of the area is listed or given higher grades. Harrow on the Hill has not been re-surveyed since the mid 1980s and some buildings may not therefore be sufficiently recognised.

PROPOSALS

1. Public realm - Much good work has already been undertaken in the Local road safety scheme and the Heritage Economic Regeneration Scheme which have sought to reduce traffic and its speed whilst using high quality appropriate materials, reduce street clutter and improve footway surfaces. However, this work should continue and the Local Authority will continue to pursue means of funding the quality conservation grade materials that are required in this area. In addition the Local Authority will undertake a streetscape audit, as recommended by English Heritage to record all the memorials and plaques which form part of the character of the area, and to record unusual and special elements of the public realm. This document will ensure that as elements of the street are renewed, the Local Authority will be aware of what is special and needs to be retained, where to improve and what sorts of materials and furniture may be appropriate. This document will be published separately and linked to the Council's forthcoming Street Design Manual as a special maintenance and management plan for Harrow on the Hill. In addition, when the New Harrow Project rolls out to this area, proposals for decluttering, cleaning and greening can be prioritised using the audit and plan so that works can be carried out in sympathy with the Conservation Area's objectives.
2. The Local Authority will encourage the Department of Culture, Media and Sport to undertake a resurvey of the Harrow on the Hill area to assess listed and unlisted buildings in order to ensure their proper protection.
3. The Council will continue to apply for external funding, and to assist the Harrow Hill Trust and the Forum to apply for funding, to undertake enhancement and improvement proposals. Possible funds such as "Living Spaces" may be appropriate for Church Fields.

HARROW SCHOOL

POLICIES

1. The Council will require that all new development respects the historic character and layout of the area.
2. There will be a presumption against the demolition of buildings within the conservation area which contribute to its special character.
4. To ensure that the character of the conservation area is both preserved and enhanced, proposals for development should:
 - a) Respect existing properties and areas of open space in terms of bulk, scale and siting.
 - b) Not impede significant views (as defined on the Designation map), diminish the gap between buildings or intrude into areas of open space.
 - c) Respect the existing layout and historical form of the townscape and street scene.
 - d) Respect and complement the existing buildings in terms of design, detailing, scale and materials in any proposals for extensions or alterations.
6. Alterations to buildings that result in a detrimental impact on the appearance of elevations that face a highway, including alterations to chimneys and rooflines, will be resisted.
8. The Council will encourage the retention and improvement of both public and private green spaces.
9. The Council will retain or, where necessary replace, street trees.
10. The Council will encourage the utility companies to install the minimum amount of new street furniture and new street furniture and to locate any furniture sensitively.
11. Where within Council control, the retention or reinstatement of traditionally designed street furniture and materials, such as street lamps, will be required.
12. Where in Council control, new street furniture will be required to be well sited and designed. Redundant and unsightly street furniture will be removed where opportunities occur.
13. The retention of visually important walls which are characteristic of the area will be required.
14. Trees and groups of trees will be further protected by the creation of additional tree preservation orders where appropriate.
15. Development adversely affecting significant trees will be refused.
17. Proposals for telecommunications equipment which detrimentally effects the character and appearance of the Conservation Area will be refused.



Other Publications

The Council produce the following Supplementary Guidance leaflets that are relevant to the Harrow School Conservation Area

Conservation Areas Residential Planning Guidelines
Listed Buildings Planning Guidelines
London Borough of Harrow Listed Buildings
London Borough of Harrow Conservation Areas

Further information regarding the Statutory Background and general Council policies relating to conservation areas can be found in the Harrow Unitary Development Plan

Published February 2004

Produced by:
LONDON BOROUGH OF HARROW
Urban Living
Planning Services
Conservation Section

PO Box 37
Civic Centre
Harrow
Middlesex
HA1 2UY

Contact:
Conservation Officer 020 8424 1468
Assistant Conservation Officer 020 8424 1467

LONDON BOROUGH OF HARROW

Meeting:	Unitary Development Plan Advisory Panel
Date:	18 March 2004
Subject:	The London Plan
Key decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Portfolio Holder for Planning, Development, Housing & Best Value
Status:	Part 1
Ward:	All
Enclosures:	None

Summary

The London Plan was published by the Mayor for London on 10 February 2004. It will provide the strategic context for Boroughs still to complete their replacement Unitary Development Plans, and more importantly for all Boroughs, inform the preparation of Local Development Frameworks. The Plan is also a material consideration in the determination of planning applications. This report sets out (1) the main messages of the London Plan, (2) the main changes in the Plan, and (3) the main policy issues of importance for planning in Harrow.

2. Recommendation (for decision by the Portfolio Holder for Planning, Development, Housing & Best Value)

2.1 To note the main messages in the published London Plan, and the main policy implications for Harrow set out in this report.

REASON: To ensure that the replacement HUDP can be adopted as expeditiously as possible, and for work on the preparation of the Local Development Framework to be started.

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

The UDP Advisory Panel considered a report on the Draft London Plan at its meeting on 24 September 2002 and agreed a Council response to the Mayor. It also received a report on the London Plan EIP Panel report on 16 September 2003.

4. **Relevance to Corporate Priorities**

The London Plan, now published, replaces Strategic Planning Guidance for London Planning Authorities (RPG3) and becomes the main regional framework document for the replacement Harrow UDP. The replacement Harrow UDP will need to be in general conformity with it before it can be adopted. The London Plan will therefore be setting the regional context for a key part of the Council's planning strategy, and relates closely to several of the Council's strategic corporate objectives, particularly those concerning enhancing the environment and developing a prosperous and sustainable economy in Harrow.

5. **Background Information and options considered**

THE MAIN MESSAGES OF THE LONDON PLAN

- 5.1 The main messages of the London Plan set down in an ALG briefing note, are as follows:-

Accommodating sustainable growth

- London is set to grow dramatically – by 800,000 people up to 2016. That is the equivalent of the new Wembley stadium filled to capacity nine times over. London's total population is projected to rise to 8.1 million by 2016.
- In parallel it is projected that there will be 640,000 additional jobs – concentrated in business services and in growing economies such as information technology, media, culture and green industries.
- Up to 30,000 new homes a year are needed to accommodate the increased population and to deal with the backlog of sub-standard housing. The Plan allocates targets to boroughs to achieve at least 23,000 a year up to 2006.
- A range of new workspaces (8 million sq metres of office floorspace alone) is needed.

Linking growth to public transport capacity

- Growth is to be focussed in the early years of the Plan in defined Opportunity Areas and Areas for Intensification, as well as existing Town Centres throughout London where there is capacity on the public transport network.

- The relationship between new development and public transport capacity is seen as critical – it will be developed further through the preparation, with partners, of the 5 Sub-Regional Development Frameworks (SRDFs).
- The Plan contains policies to improve the suburbs and many local transport schemes are proposed to improve the quality of life across the capital.

Securing a compact city, a better environment and high quality design

- The scale of growth envisaged can only be accommodated, without building on the Green Belt or on open spaces in London, by building to higher densities.
- The Plan promotes tall buildings where appropriate.
- Acknowledging the above requires better design, and the Plan also includes a range of policies to protect and improve the historic environment, the public realm, and green and water spaces as well as strategic views.
- There is a series of policies on climate change, energy efficiency, waste, biodiversity, noise, air quality and other environmental issues, and the Plan provides the spatial context for the Mayor's other Strategies.

Ensuring social and economic inclusion

- The plan strongly promotes social and economic inclusion, with policies targeted at different communities, smaller enterprises, black and minority ethnic businesses and the voluntary and community sectors more widely.
- It also promotes inclusive environments.
- The policies to ensure that 50% of all new housing is affordable are essential to greater social inclusion.
- The policies to ensure that Londoners obtain relevant training and skills to compete successfully for the new jobs are seen as vital, for social, economic and sustainability reasons.

Realism, sustainability and action

- Overall, the Plan focuses on making real and sustainable change by opening with an examination of the impact of the forces driving change in London and by closing with a detailed set of proposals for implementation
- The Plan recognises the need to work closely with existing partnerships in London and with the neighbouring regions.

THE MAIN CHANGES BETWEEN THE DRAFT LONDON PLAN AND THE PUBLISHED PLAN.

The published London Plan has been significantly re-structured when compared with the draft London Plan previously considered by Members. In summary, the main changes are:-

Policy I.1 - The Mayor's objectives (Page 6 of the Plan)

Six objectives for the Plan are set out under this policy:-

1. To accommodate London's growth within its boundaries without encroaching on open spaces.
2. To make London a better city for people to live in.
3. To make London a more prosperous city with strong and diverse economic growth.
4. To promote social inclusion and tackle deprivation and discrimination.
5. To improve London's accessibility.
6. To make London a more attractive, well-designed and green city.

UDP policies should take these objectives fully into account.

Policy 2A - Sustainable development (Page 38)

An overarching policy requiring that all policies in the Plan promote sustainable development is now included. The policy sets out the sustainability criteria that will be used by the Mayor in developing Sub-Regional Development Frameworks (SRDFs) and considering planning applications referred to him. Again, UDP policies should reflect the criteria included.

The Plan has a greater emphasis on being people-centred and relating fully to overall quality of life

There are new strategic priorities for Sub-Regions

The roles of Sub-Regional Development Frameworks (SRDFs) have been strengthened.

Implementation policies have been expanded and clarified.

The Plan is shorter and more policy-focused

Further changes have been made within each of the Chapters, as follows:-

5.2 Chapter 3A - Living in London (Pages 53-85)

The policy for increasing the supply of housing has been made far more ambitious – moving towards an output of 30,000 additional homes a year (as opposed to a minimum of 23,000 in the draft Plan).

The policies on affordable housing have been clarified, but the overall strategic target, that 50% of all additional housing should be affordable, remains.

There are new policies to enhance social infrastructure and support the voluntary and community sector.

The needs of London's diverse population have been integrated more fully throughout the plan.

5.3 Chapter 3B - Working in London (Pages 87-101)

The policy for mixed uses has been clarified.

The policy on Strategic Employment Locations has been clarified and strengthened including cross references to the sub-regional policies.

There is greater emphasis on the role and needs of small and medium-sized enterprises and of black and minority ethnic businesses.

5.4 Chapter 3C - Connecting London (Pages 103-129)

There is a new policy on sustainable transport in London, and there is an emphasis on reducing the need to travel.

Parking policies have been expanded to take in material that was in an Annex in the draft plan.

5.5 Chapter 3D - Enjoying London (Pages 131-153)

The policies for Town Centres have been strengthened and those for the suburbs clarified.

5.6 Chapter 4 - Cross-cutting policies (Pages 155-218)

The policy on waste strategy and targets has been made considerably more specific.

There is greater emphasis on, and a wider concept of, heritage.

The policies on the protection of London Views have been clarified, and two new views added (Richmond Park and Westminster Pier).

The policies for the Blue Ribbon Network have been moved into the body of the plan.

MAIN POLICY ISSUES OF IMPORTANCE FOR PLANNING IN HARROW.

For ease of reference, the main issues have been identified in the order in which they appear in the London Plan, as follows:-

Chapter 2 - The Broad Development Strategy (Pages 37-50)

The Plan reiterates that there are no Opportunity Areas, Areas for Intensification or Areas for Regeneration identified in Harrow (Policies 2A.2 -2A.4). Policy 2A.5 Town Centres, is concerned with developing a polycentric strategy for London's development by promoting London's town centres in accommodating economic growth, meeting the needs of Londoners and improving the sustainability of London's development. This is to be achieved through partnership working on the Sub Regional Development Frameworks (SRDFs).

The Suburbs (Page 45)

Policy 2A.6 Spatial strategy for suburbs, states that UDP policies should contain spatial strategies for promoting change within, and enhancing the quality of, suburban London, and then sets out detailed matters indicating that UDPs should be developed with particular attention to the policies in the Plan for town centres, employment, housing provision and design for a compact city. Members may recall that considerable concern was expressed by many outer London Boroughs about the lack of mention of the suburbs in 'Towards a London Plan', a weakness that was addressed in the draft London Plan. The continuation of this policy emphasis is particularly welcomed as it recognises the important role that suburban London plays in the city as a whole.

It is important to note paragraph 2.24 (Page 47)) (formerly Policy 2A.9) which states -'In collaboration with boroughs, the Mayor will prepare good practice guidance and a 'sustainable suburbs' toolkit to guide development policies in suburban centres, employment areas, neighbourhoods and heartlands.' It will be interesting to see what level of detail is contained in this guidance and toolkit.

The draft plan (para 2A.59) offered as a guide a distance of 800m around town centres as the area for higher densities and accessibility to good public transport. This has been removed in the published London Plan. This was a guide to indicate that town centres are easily accessible to the public and residents. Removal will give Harrow greater flexibility to judge the accessibility ranges in different areas of the Borough, allowing for an area based approach. A range of distances of, say, 400-800m is considered to be more appropriate, together with recognition of the other local factors such as character and local impact.

Town Centres (Page 44)

Discussion at the Examination in Public (EIP) focused on the need for the Plan to indicate a strengthened role for town centres in the plan. Policy 2A.5 Town Centres, recognising the strategic significance of town centres, has been introduced in Chapter 2. Further references to town centres have been introduced at relevant places throughout the plan.

Housing Policies (Page 54 of Plan)

Increasing the overall supply of housing

Policy (3A.1) states the Mayor will "seek the maximum provision of additional housing in London towards achieving an output of 30,000 additional homes per year from all sources", but qualifies this by further stating that housing provision up to 2006 will be monitored against a minimum target of 23,000 homes per year. The Boroughs' housing targets given in the plan are those for total capacity agreed with boroughs through the last London Housing Capacity Study. Members will recall that

the Council objected at the Panel to the inclusion of non-conventional capacity, but has since accepted the revised figure of 6,620 additional 'homes' and included it in the proposed modifications to the HUDP. Paragraphs 3.11 and 3.13 point out that the 23,000 capacity figure will be reviewed as a result of the 2004 London Housing Capacity Study, and that additional capacity will be sought with a view to achieving 30,000 additional homes per annum. The intention is for revised figures to be incorporated in the London Plan by 2006.

Affordable Housing (Page 60)

Definition of affordable housing (Policy 3A.6 on Page 60)

Borough Affordable Housing Targets (Policy 3A.7 on Page 64)

Negotiating affordable housing in individual private residential and mixed use schemes (Policy 3A.8 on Page 65).

The Mayor sets a strategic target for affordable homes across London of 50% (Policy 3A.7), but it should be noted that specific borough targets have been removed in line with the arguments put forward by the ALG and Boroughs at the Panel. In individual schemes the Mayor states that 'targets should be applied flexibly..' (Policy 3A.8). In addition, clear guidance is now given that the 50% target includes affordable housing from all sources and not just that secured through planning obligations – it includes 100 per cent affordable schemes by housing associations, intermediate housing, non self contained accommodation, gains from conversions and from bringing long term vacant properties back into use, as well as new housing.

The prescribed 70:30 split for social housing and intermediate housing has not been deleted from the Plan, but this should not create any problems since most Boroughs have now recognised that an indication of priority needs will inform discussions with developers at the pre application stage.

Chapter 3B Working in London

2. Demand and supply of office accommodation (Page 88)

The main thrust of making London a more prosperous city remains, and the projected additional West London office space is the same as in the draft plan (1.1 million sq.m out of a total of 8.1 sq.m). The fact that the Crossrail proposals are not going ahead may reduce the attractiveness of suburban centres such as Harrow to meet their share of new built stock.

3. Manufacturing and Wholesale distribution (Page 92)

Policy 3B.5 acknowledges the importance of Strategic Employment Locations (SELs), and these have not changed. Annex 2 identifies Wealdstone Industrial Area as a Preferred Industrial Location, whilst the

Honeypot Lane (Stanmore) site is identified as an Industrial Business Park.

Chapter 3C –Improving travel in London

Closer integration of transport and spatial development (Page 103)

Integrating transport and development

The Plan contains Policy 3C.1 which specifically encourages “patterns and forms of development that reduce the need to travel especially by car”. There is a new section of the plan included in Chapter 2 on the importance of town centres (Policy 3C.23 deals with parking in town centres. Annex 4 to the Plan (Page A19) sets out parking standards which are unchanged from the draft Plan.

The deletion of the proposed phase II of Cross rail may reduce the attractiveness of Harrow as a London suburb to attract new businesses and economic growth. Therefore whilst it is suggested that areas around town centres are the most appropriate for higher density development and for a greater mix of uses, if these take place separately to developments in public transport, there is likely to be great pressure on the existing system.

Higher density development may lead to congestion of housing development and people in town centres with transport systems that do not have the capacity to cater for such high demand, (considering the fact that car free developments are being encouraged). This will also make Harrow a less attractive suburb for businesses to locate in, thus making our recommended employment targets difficult to meet. A balance in land use mix is vital for sustainability, as is the need for transport networks to support it.

Map 3C Proposed major rail transport schemes and development opportunities in London (Page 107)

Crossrail – The former Option 2 (Crossrail proposed through Harrow) has been deleted from the adopted plan to reflect the latest Central Government decision on the project.

Better Public Transport (Page 112)

The emphasis in the London Plan remains focused on sustainable means of transport. Apart from the Crossrail proposal (Phase 2) most of the major transport improvement schemes outlined in the draft plan appear in the adopted plan. The parking standards in Annex 4 of the Plan have not changed, apart from alterations to the text.

Improving London's open environment (Page 142)

Recognising the increasing importance of open space for the quality of London's residents, Policy 3D.7 - Realising the value of open space, although ambiguous in its title, aims to protect and promote London's network of open spaces, to realise the current and potential value of open space to communities, and to protect the many benefits of open space, including those associated with health, sport and recreation, children's play, regeneration, the economy, culture, biodiversity and the environment. Along with Policies 3D.8 Green Belt and 3D.9 Metropolitan Open Land strategic support is provided for many open spaces in Harrow. Given the pressures for new development, and housing in particular, the Plan recognises the need to identify areas of open space deficiency and priorities in addressing them (Policy 3D.10). The latter policy identifies the importance of audits of open space and the need to produce open space strategies to protect, create and enhance all types of open space (Policy 3D.11). (In this connection the urgent need to undertake an audit of open space and needs assessment in Harrow is currently being explored).

Biodiversity, Habitats and Species (Page 148)

Policy 3D.12 Biodiversity and Nature Conservation, sets down the Mayor's intentions to ensure a proactive approach to the protection, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy, and also identifies Sites of Metropolitan Importance for Nature Conservation. The successful implementation of this Policy relies heavily on Boroughs. Currently Harrow is one of only a handful of Boroughs which does not have a Biodiversity Action Plan. In addition, Policy 3D.12 requires Boroughs to identify sites of Borough or Local Importance for Nature Conservation. This is particularly pertinent to Harrow, as the results of the GLA's 2003 survey of nature conservation sites will need to be the subject of a public consultation exercise, and following that, consideration of how the site designations and boundaries are to be taken forward in the development plan.

Waste (Page 156)

Waste strategic policy and targets

The Plan recognises problems on data collection and discussion with stakeholders by identifying the need (Policy 4A.1) for an "early alteration to the plan to bring forward regional self sufficiency targets for individual waste streams". A consultation on the alteration to the waste planning policies is due during 2004.

Improving Air Quality (Page 162)

Policy 4A.6 relates to the implementation of the Mayor's Air Quality Strategy and highlights the means of securing reductions in pollutant emissions.. Members are advised that work is currently underway amongst West London Boroughs, with a view to producing supplementary planning guidance on this subject, recognising the need to consider policies for areas larger than individual Boroughs.

Improving the use of energy (Page 164)

Policies 4A.7-4A.10 cover a range of matters relating to energy efficiency, energy assessments and renewable energy. The increasing importance being attached to renewable energy is reflected in several of the Plan's policies.

Designs on London (Page 173).

The fundamental aim of the section is unchanged. It continues to recognise good design as central to all the objectives of the plan, and seeks to establish a policy framework in which to promote a more design-led approach to development. This very much reflects one of the key objectives of the HUDP. Policies encouraging sustainable design, inclusive environments, public realm improvements and respect for local context have been retained in essentially the same form as the draft plan, and this is to be supported. Welcome changes have been made to several policies, but particularly Policies 4.B1 and 4B.8. Policy 4B.1(Design principles for a compact city) now refers to the need for development to respect "London's built heritage", and to respect "character" as well as "local context and communities". In addition, the policy no longer requires Boroughs to "encourage, support and require" development to be considered against specified design principles, but to "seek to ensure" that development addresses those principles. This approach is more consistent with the HUDP and provides Boroughs with some flexibility in the interpretation and implementation of the policy. Policy 4B.8 (Tall buildings – location) has removed the requirement for Boroughs to promote tall buildings (this will remain with the Mayor) and introduces the need for development of this type to be acceptable in terms if design and impact on surroundings as well as other considerations. The policy also now recognises that Boroughs may wish to define areas within their UDPs that could be sensitive to tall buildings.

Housing Density (Page176)

Maximising the potential of sites

The London Plan maintains the density matrix (page 177) included in the draft Plan, with different densities for different locations, higher in town centres, and areas of good public transport accessibility. Members may

wish to note that local character is acknowledged in paragraph 4.45 which states: “The density matrix sets a strategic framework for appropriate densities at different locations. It aims to reflect and enhance existing local character by relating accessibility of an area to appropriate development and the number of car parking spaces that should be provided.”

Social inclusion and accessibility issues (Page 178)

Policy 4B.5 Creating an inclusive environment states that the Mayor will require all future developments to meet the highest standards of accessibility and inclusion. Under this policy, paragraph 4.50 states that a truly inclusive society demands an environment in which a diverse population can exist harmoniously and where everyone, regardless of disability, age or gender, can participate equally and independently, with choice and dignity. The design, construction and management of the whole range of buildings, spaces and places is a fundamental part of this.’

It is suggested that Boroughs should require development proposals to include an Access statement showing how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed. The Mayor has prepared draft Supplementary Planning Guidance on creating inclusive environments.

Affordability and accessibility are areas which the London Plan addresses with regards to sporting and housing provision, access to open spaces and leisure facilities, health care and transport. The need for convenient, cheap, safe and reliable public transport is recognised to be an important priority for older people (para 3.65). The need to increase London’s skills base to increase accessibility into employment is another area that the plan addresses.

Sub Regional Development Frameworks (SRDFs) (Page 222)

Overall approach to sub-regional development

Policy 5A.1 states that the Mayor, in partnership with other stakeholders in each of the five sub-regions, will bring forward SRDFs for implementing and developing the policies set out in the Plan. The Mayor has not accepted panel recommendation that SRDFs should have formal Development Plan Document or SPG status, and SRDF’s will be considered as non-statutory planning documents. SRDF’s may identify new policy areas, but it is unclear what status these new policies will have. One improvement in the London Plan is that it gives more detail on content of SRDF’s, plus identified strategic priorities for each sub region. It is important, however, that implementation of the plan involves real partnership working with the Borough(s), and not imposition.

West London sub-region

The sub-region map (p.257) is larger and clearer than in the draft and notes Harrow as a Metropolitan Centre and indicates the Preferred Industrial Location (Wealdstone) and Industrial Business Park (wrongly located in the Stanmore Park area rather than Honeypot Lane). The section on town centres in West London (p.263) comments on the specific roles of a number of centres and then states: “Opportunities for intensification at other town centres in West London, including Harrow, should be exploited.” This is a significant addition from the draft London Plan, as far as Harrow is concerned, and provides strategic support for the emerging plans for Harrow Town Centre.

The section on North London sub-region includes an important reference (p.271) to Brent Cross: “The Sub-Regional Development Framework [for North London] will guide the evolution of Brent Cross regional shopping centre into an integrated town centre. This should not compromise the potential of Wood Green, Wembley and Harrow and other centres to provide sustainable access to higher quality goods and services.” It also stipulates (p.269) that the redevelopment of Brent Cross as a town centre “..should be informed by an independent assessment of the need for and impact of further retail development.” which will further protect Harrow’s interests.

Planning Obligations (Page 286)

Policy 6A.4 on priorities in planning obligations notes the wish of the Mayor “to develop with boroughs a voluntary system of pooling for the provision of facilities related to proposed developments”. The idea of the Mayor seeking secondary legislation to enable him to become a party to Section 106 agreements is maintained in the section on first review of plan and is identified as one of the key changes which the Mayor will discuss with government. (Para. 6.98)

Monitoring and Review of the Plan (Page 307)

Policy 6B.2 Measuring progress, involves the Mayor publishing an Annual Monitoring Report that measures progress on the London Plan against a set of specific targets. The expectation is also that Boroughs should include borough-wide targets that reflect the Plan’s strategic targets at the local level in their Community Strategies and UDPs. Whilst supporting the need for effective monitoring to inform progress on implementing the Plan, due recognition needs to be given to the fact that Boroughs will be expected to provide much of the information. This comes at a time when the need to provide a comprehensive evidence base for the LDF process is also being promoted.

First review of or alteration to the London Plan (Page 316)

Whilst publication of the London Plan initially has primary importance for the Council in securing the adoption of its replacement HUDP, work is already being undertaken towards the first review of the London Plan. The Council will be required to comment on a number of matters in the next 18 months or so. Paragraph 6.97 (Page 316) sets out an indicative programme for the first review or alteration, as follows:-

- completion of draft Sub-Regional Development Frameworks by the end of 2004.
- completion of the new Housing Capacity Study by end 2004.
- consultation on alteration to waste planning policies during 2004, publication by mid 2005.
- consultation on first review early 2005.
- draft plan by late 2005.

In addition, a programme of supplementary planning guidance is being progressed in relation to the London Plan, most of which will have relevance for planning in Harrow. Annex 6 (Page A35) sets out an indicative timetable for the production of the following 11 SPGs:-

- 1 Accessible London (draft published July 2003)
- 2 Industrial Capacity (draft published September 2003)
- 3 Housing provision (draft to be published March 2004)
- 4 Urban design principles (draft to be published March 2004)
- 5 Affordable housing (draft to be published March 2004)
- 6 Sustainable construction and design (draft to be published April 2004)
- 7 View framework management (draft to be published April 2004)
- 8 Land for transport functions (draft to be published April 2004)
- 9 Renewable energy (draft to be published May 2004)
- 10 Meeting the spatial needs of London's diverse communities (draft to be published May 2004)
- 11 Retail need assessments (draft to be published July 2004).

Annex 1 London's strategic town centre network (Page A1)

The metropolitan status accorded Harrow Town centre is unchanged (table A1.1 on Page A3) and there is no change in terms of the list of centres included in the Plan as opportunity areas.

6. Consultation

6.1 The Council will need to give further consideration to the implications of the London Plan for both the replacement HUDP, and the LDF when work is commenced on that. With the increased emphasis

being given by the government to community involvement, the contents of the London Plan are likely to be subject to considerable comment by Council partners, business and the community.

7. **Finance Observations**

There are no immediate financial implications from the publication of the London Plan.

8. **Legal Observations**

8.1 The replacement HUDP will need to be in general conformity to London Plan now that it has been published. Members will already be aware that it will be a material consideration in the determination of planning applications.

9. **Conclusions**

Having made representations to the Mayor at previous consultation stages, and voiced a number of concerns, the Council must now focus on some very important matters emanating not only from the Plan's publication and its implications for the HUDP, but importantly relating to its implementation, monitoring and review. Besides the fundamental issue of general conformity (see other report on the agenda), officers will be embarking on a considerable amount of work associated with the Plan. Some of these are listed under the heading 'First review of or alteration to the London Plan (Page 316)', above. One of the key challenges in the development of the Local Development Framework (and its constituent documents) for Harrow, will be to ensure that the scope for possible conflict with the London Plan Review is minimised.

10. **Background Papers**

The London Plan – Spatial Development Strategy for Greater London, Mayor for London, Greater London Authority, February 2004
Reports to the UDPAP 24 September 2002 on Draft London Plan, and 16 September 2003 on the London Plan EIP Panel report.
The London Plan – Initial Briefing Note (ALG) – 12 February 2004

11. **Author**

11.1 Dennis Varcoe, Group Planner
Extn. 2460; e-mail: dennis.varcoe@harrow.gov.uk

Meeting:	Unitary Development Plan Advisory Panel
Date:	18th March 2004
Subject:	Planning Policy Statement (PPS6): Planning for Town Centres
Key Decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Planning, Development, Housing and Best Value
Status:	Public
Ward:	All
Enclosures:	None

1. Summary

- 1.1 The proposal to replace PPG6 with a new Planning Policy Statement PPS6 forms part of a wider Government wider agenda to modernise the Planning System. The consultation draft broadly follows the principles established in PPG6 and does not therefore raise any fundamental issues. However the requirement imposed on local planning authorities in relation to additional research and information needs will stretch existing resources unless extra help is provided by central government.

2. Recommendation (for decision by Cabinet)

2.1 The Panel is recommended to:

- (i) Agree the comments, in appendices (A), as the Council's response to the Government consultation on revised PPS6
- and
- (ii) Authorise officers to forward these comments as the Council's response to the Office of the Deputy Prime Minister (ODPM).

REASON: As set out at paragraph 4.

NB It is proposed that, as the next Cabinet meeting after 18th March will not take place until the 20th April, the above recommendations be processed via the urgency procedure to ensure that the Panel's comments can be forwarded to the ODPM as soon as possible.

3. Consultation with Ward Councillors

- 3.1 None

4. Policy Context (including Relevant Previous Decisions)

- 4.1 As part of the Government's proposals to modernise the planning system all Planning Policy Guidance (PPG) notes are to be replaced with Planning Policy Statements (PPS). The new draft Planning Policy Statement (PPS6): Planning for Town Centres, is one of these.

Comments are invited by 15 March 2004 and Government would welcome views on whether:

- there are any further elements of PPG6 that should have been included in PPS6
- anything in the draft policy statement is unclear, or would present difficulties in practice
- separate guidance on any other aspects of the planning policies in PPS6 would assist in the implementation of these policies.

5. Relevance to Corporate Priorities

- 5.1 The new PPS will inform on a key aspect of the Council's attempt to enhance the environment of Harrow and help develop a prosperous and sustainable economy. It is hoped that the policy framework to be developed as part of the LDF will benefit from this new guidance.

6. Background Information and Options Considered

- 6.1 See Appendix

7 Consultation

- 7.1 None

8. Finance Observations

- 8.1 Any additional costs arising from the Government's proposals will be reported to a future meeting.

9. Legal Observations

- 9.1 None

10. Conclusion

- 10.1 A Council's response on draft PPS6 is set out in the appendix to the report and will be submitted, with any changes agreed at the Panel, to the ODPM.

11. Background Papers

- 11.1 Draft Planning Policy Statement 6: Planning for Town Centres.

12. Author

- 12.1 Dr. Charles Alonge – 020 8424 1461

APPENDIX A

1. Introduction

- i The Council welcomes the opportunity to comment on the consultation draft: Planning Policy Statement 6: Planning for Town Centres.
- ii The Council welcomes any review which strengthens the role of local planning authorities in shaping town developments, districts and local centres.
- iii PPS6, with its emphasis on regenerating town, district and local centres will provide a reference point for the preparation of core strategy for the new LDF.

2. What the Government says

The revised Planning Policy Statement on Planning for town centres (PPS6) will encourage retailers to develop in town and city centres rather than build new stores in out-of-town locations. It will encourage the urban renaissance, drive development and promote social inclusion. The PPS places responsibility on local authorities to plan for growth in town centres and encourage their expansion where this will help further development.

3. Key Objectives

The Government's key objective for town centres is to promote vital and viable city, town and other centres by:-

- planning for growth of existing centres
- promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all
- enhancing consumer choice
- making provision for a range of shopping, leisure and local services
- allowing genuine choice to meet the needs of the entire community, and particularly socially excluded groups
- supporting an efficient, competitive and innovative retail and leisure sector, with improving productivity
- improving accessibility, ensuring that existing or new development is, or will be, highly accessible and well served by a choice of means of transport

4. Means of achieving the Objectives

The Government outline various ways in which local authorities can work towards attaining these objectives. They expect local authorities through the development plan to actively promote growth and development in existing centres and to:

- develop a hierarchy and network of centres;
- assess the need for further town centre uses and ensure there is the capacity to accommodate them;
- focus development in, and secure the expansion of, existing city, town, district and local centres as appropriate, and identify appropriate sites in their plans; and
- promote town centre management, creating partnerships to develop, improve and maintain the town centre, including the evening economy.

5. Paragraph 1.7 – Acceptable land use in Town Centre

The PPS, in paragraph 1.7 outlines the main types of development and land uses in town centres. These include:

- retail, leisure, entertainment facilities and the more intensive sport and recreation uses (such as cinemas, restaurants, drive-through restaurants, bars and pubs, night clubs, casinos health and fitness centres, bowling alleys and bingo halls);
- offices, both commercial and those of public bodies;
- arts, culture and tourism (theatres, museums, galleries and concert halls, hotels and conference facilities); and
- small-scale community facilities (including health centres, pharmacies, post offices, libraries and job centres).

Comments

The Government's attempt to indicate acceptable land use in town centres is inconsistent with the approach adopted in the other guidance. The list of land uses is rather long and there is the danger that this will increase the prospect of inflexibility by default but the main emphasis should be on retail use. It is more desirable to state clearly the nature of development that should not be promoted in town centres. Presumption against inappropriate development in town centres similar to the control over development in the Green Belt would be more appropriate (see PPG2 Para.3).

6. Positive Planning for Centres

Paragraph 2.1 and 2.2 encourage the promotion of vital and viable town centres by requiring that development should be focused in existing centres in order to strengthen and, where appropriate, regenerate them. Local planning authorities should actively manage change by planning for the growth or, where appropriate, the decline of centres; define a network of centres with a more even distribution of functions, and a hierarchy of centres each performing their appropriate role to meet the needs of their catchments; adopt a pro-active, plan-led approach to planning town centres, through regional, sub-regional and local planning and use tools such as town centre strategies, to address the transport, land assembly, crime prevention, planning and design issues associated with the growth and management of their centres.

Comments

The Council acknowledges the need to promote vibrant and thriving town centres and sees these as drivers to the economic life of the community. This proposal will further initiatives already taken by the Council in terms of town centre strategy and management. However the notion of a town centre hierarchy and network of centres is not easily identifiable in existing built up areas where the town centres are a product of organic growth rather than planning principles. Most centres in Harrow perform multi functions and it is not always the case that functions can be more evenly distributed. In all probability the scope for redistribution of functions or the re-creation of a hierarchy of centres in built up areas is severely limited. This proposal is therefore more aspirational.

7. Promoting and Managing Growth in Town Centres

Paragraphs 2.3 – 2.6 relate to the need for local authorities to actively plan for growth in retail, leisure, office and other town centre uses over the plan period.

Comments

Local authorities already have the capacity to manage and promote growth in town centres. Most local authorities now have town centre strategies and town centre management initiatives. However, it is not very clear how the new emphasis on growth in town centres uses can be reconciled with the changes in PPG3 with the emphasis on allowing the loss of potential office and employment uses to residential use. Whilst the local authority may plan for growth the real choice of where development takes place is influenced by the perception and corporate strategies of the potential investors.

8. Network of Centres

Paragraphs 2.7 and 2.8 assume a network of centres arranged in hierarchical order. The PPS argues that in the context of promoting and enhancing existing centres, planning authorities should consider the pattern or provision of different centres – their network, roles and hierarchy. Network and hierarchies are dynamic and will change.

Comments

Whilst the concept on which town centre hierarchies are based may be relevant to new settlements, it is very difficult to translate this into practice in built up areas like Harrow. The scope for the designation of new centres or the creation of a network of centres or hierarchies is very limited and there remains only a remote possibility of creating new town centres in any of the existing towns and cities. The absence of any guidelines which could be used to determine the location of new centres could further fuel the prospect of creating new retail and office development similar to Brent Cross/Cricklewood and Blue Water.

Classification of town centres in graded subdivision is unlikely in most urban areas where the dynamic of change is gradual and slow. The hierarchy of town centres is not easily identifiable. The sequential approach advocated by the PPS is very much in line with the Council's current policy.

The concept of re-ordering town centres through redistribution of activities is impracticable and ignores market considerations. Higher level centres fulfil a different role (mainly for comparison goods). It is unrealistic to expect LPAs to distribute growth in comparison shopping to lower order centres; multiples simply won't go there.

9. A Pro-Active, Plan-Led System

Paragraphs 2.10 and 2.12 deal with the role of Regional Planning Bodies and Local Planning Authorities in the future planning of town centres. Both are required, inter alia, to assess the need for additional floorspace and the capacity of existing centres to accommodate new development. In addition, paragraph 2.14 advises Local Planning Authorities to work with business and other interested parties and:

- identify and allocate sites;
- review all existing allocations; and
- develop local strategies for ensuring equality of access to local facilities.

Comments

The respective roles of Regional Planning Bodies and Local Planning Authorities in assessing need for floorspace and the capacity of centres to accommodate development is unclear. Both are required to undertake similar assessments and the likelihood of conflict and duplication of effort is considerable. The scope and extent of the information needed to carry out such an elaborate assessment will be such that additional resources will be required, since any estimate or projection of floorspace requirement would rely on accurate forecasts based on good quality data. Such higher level data would draw heavily on local authorities' resources. The notion that local authorities should assess the overall need for additional floorspace over the plan period for land uses such as retail leisure and office and to consider where the identified needs would best be met is only possible if such detailed study required is backed by adequate resources.

10. Secure the Appropriate Scale of Development

Para. 2.33. Requiring LPAs to set out the maximum gross floorspace on an individual development which will be acceptable in different types of centres in their area.

Comments

This is unrealistic. The Council's view is that this should be determined by site and design considerations which cannot be prescribed in advance. Sites can be assembled for major new development. It would be impossible and potentially damaging to set size targets for this sort of development in local plans.

11. Consultation with Developers

Para 2.37 advises local planning authorities to be sensitive to the needs of developers and to consult with the development industry when planning for growth.

Comment

The Council agree that LPAs should identify sites capable of accommodating a range of business models but also expect developers to be flexible. In general terms this advice conflicts with that in 3.17 and 3.18. The latter gives carte blanche to the large format operators to argue that a town centre site would not be suited to their business model (because they would have to reduce the range of products or split their store). It would perpetuate out of centre development format for many retail types (DIY stores in particular). Retailers like Tesco and MFI, however, have clearly shown that they can operate a range of different models to suit site size and characteristics. The PPS should encourage them to bring forward the right model for the right site, even if the product range is reduced as a result.

12. Conclusion

The current proposal requires significantly more staff and resources than are currently at the disposal of local authorities. The need for more up to date information and plethora of research work required will lead to the engagement of more staff and the engagement of consultants at a cost beyond that which most local authorities can afford without additional help from central government.

A key point for consideration is the over emphasis on planning for growth. This may not be appropriate or required in all cases. Although planning for decline or consolidation is recognised (in 2.1 & 2.13) the clear and overriding message throughout is the need for growth. There is, however, no basis for this in a plan led system. Inevitably the needs of individual centres will vary. Many smaller district centres in particular are over shopped. Their future should therefore be planned on the basis of need and capacity and not simply to achieve a prescribed, and perhaps, inappropriate goal.

ca15/pr

This page is intentionally left blank