

**Planning Obligations and Affordable Housing  
Supplementary Planning Document  
Consultation Statement – September 2013**

Respondents:

1. English Heritage
2. Thames Water
3. Natural England
4. Campaign for a Better Harrow Environment
5. Highways Agency
6. Metropolitan Police
7. Kingsfield Estate Resident’s Action Group
8. Mayor of London
9. Harrow Environmental Forum

Consultee	Comment Made	Council’s Response
English Heritage	<p>The National Planning Policy Framework sets out a presumption in favour of sustainable development, which, under paragraph 7, includes protecting and enhancing our natural, built and historic environment. Conservation and enhancement of Harrow’s heritage assets and their settings is set out as an Overarching policy objective (objective 18), in Core Strategy Objective 1 D, and in relation to the various area – related policies within the Core Strategy.</p> <p>Planning obligations an important way of helping deliver sustainable development, helping ensure that development proposals are acceptable in national and local planning policy terms. In regard of the historic environment this can be achieved by delivering protection and enhancements to historic buildings and areas. We therefore urge the Council to include a paragraph within this SPD setting out opportunities for planning obligations to be used to address the historic environment. Where appropriate, types of contribution can include; repair, restoration or maintenance of a heritage</p>	<p>Chapter 14 of the SPD already addresses the use of planning obligations to secure the conservation and enhancement of the borough’s historic environment. Paragraph 14.4 of the SPD already sets out the types of obligations that might be sought in relation to heritage assets – these are exactly as that listed in the representation. No further amendments are required as the matters raised in the representation are clearly already adequately addressed in the SPD. <b>No change.</b></p>

Consultee	Comment Made	Council's Response
	<p>asset(s) and their setting; increased public access and improved signage to and from heritage assets; interpretation panels/ historical information and public open days; production and implementation of up-to-date Conservation Area management plans and appraisals; measures for preservation or investigation and recovery of archaeological remains and sites; display of archaeological sites and dissemination of information for public/ school education and research; and sustainability improvements (such as loft insulation) for historic buildings.</p> <p>This list is by no means exhaustive but provides an indication of the type of planning obligations that are used and could be incorporated in this SPD. Potential beneficiaries of historic environment planning obligations could include heritage assets currently at risk from neglect, decay, under-use or redundancy. Each year English Heritage publishes a <i>Heritage at Risk</i>, which comprises information on all heritage assets that are vulnerable due to disrepair. This is available at <a href="http://www.english-heritage.org.uk">www.english-heritage.org.uk</a>. The 2012 register contains 16 assets which are identified as being at risk within the London Borough of Harrow.</p>	
Thames Water	<p><b><u>Omission of Section on Sewerage/Wastewater [and Water Supply] Infrastructure</u></b></p> <p>Regarding the funding of sewerage/wastewater [and water supply] infrastructure, it is Thames Water's understanding that Section 106 Agreements can not be required to be used to secure sewerage/wastewater [water supply] infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place ahead of development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.</p> <p>Sewerage [and water] undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing and Local Plan policies or the use of Grampian style conditions attached to planning permissions.</p> <p>It is important that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead</p>	Both the Development Management Policies and Heart of Harrow AAP draw attention to the need for developers to demonstrate adequate sewage & wastewater capacity to serve the development. In those instances where improvements are required, the Council would use a condition, rather than planning obligations, to secure works in accordance with an agreed drainage strategy. <b>No change.</b>

Consultee	Comment Made	Council's Response
	<p>to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing sewerage [and water supply] infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.</p> <p>Thames Water rely heavily on the planning process to ensure they have the necessary infrastructure in areas where development locations are clearly identified and seek planning conditions where it is not. Capacity problems, possibly leading to flooding, could occur in some cases if Thames Water have not been given the opportunity, either through advance planning or through conditional planning approvals, to provide the capacity prior to the development taking place.</p> <p>If the developer fails to consult with Thames Water in the early planning stages then, as noted above, this will lead to Thames Water requesting a Grampian style condition or potentially objecting to the application.</p> <p>We therefore consider that the following section should also be added to the SPD:</p> <p><u>"Sewerage/Wastewater [and Water Supply] Infrastructure</u></p> <p><i>Developers will be required to demonstrate that there is adequate wastewater/sewerage capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing sewerage/wastewater infrastructure. Drainage on the site must maintain separation of foul and surface flows.</i></p>	
Natural England	<p>Natural England has considered this Planning Obligations Supplementary Planning Document and is happy that the Biodiversity Policy (chapter 19) put forward within it does cover what we would expect to see. We welcome this and also the Sustainable Design and Construction Policy (Chapter 16), which has regard for making use of water retention and recycling systems where possible. Sustainable Urban Drainage Systems would also be welcomed as these can be used to great effect around Green Infrastructure within the</p>	<p>The Council notes Natural England's support for the SPD. NB: the provision of SUDS was already addressed in the SPD under Chapter 18 on Floor risk. <b>No change.</b></p>

Consultee	Comment Made	Council's Response
Campaign for a Better Harrow Environment	<p>Biodiversity Policy.</p> <p><b>1. Definition of terms</b> From the first page onwards the Document does not make clear to what developments it applies. For example:</p> <p>a) A on page 3 states:</p> <p><i>'Planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes ...'</i></p> <p>Does that include the re-development of office blocks to provide residential accommodation?</p>	<p>The supporting text to Policy DM50, which is re-provided on page 3 of the SPD, clearly states that:</p> <p><i>"... the nature of site specific impacts means they vary widely depending on the site, its local context, and the nature of the development proposed. Therefore, beyond the requirements for affordable housing, it is not possible to ascribe a set of circumstances under which certain types of obligations will be sought as a norm. To assist developers and others to understand what types of obligations may be sought, and how these may be best met, the Council is preparing a Planning Obligations SPD."</i></p> <p>The obligations listed in the SPD are therefore those that might be expected given the types of development provided for by the Local Plan. However, this list is not exhaustive and other obligations not listed may be required to mitigate a specific development's impacts. <b>The Council will add a paragraph to this effect in Chapter 1 of the SPD.</b></p> <p>With regard to the re-development of office blocks to residential development, this has been provided for as permitted development by the Government, and is therefore not subject to the requirements of the Local Plan, and therefore planning conditions and obligations can not be sought.</p>
Campaign for a Better Harrow Environment	<p>b) The entry between paras 6.30 &amp; 6.31 on page 21:</p> <p><b>'Development types from which obligations are sought</b> Residential developments, including mixed-use developments, with a capacity to provide ten or more dwellings (gross).'</p> <p>Does this include conversions of existing residential accommodation, eg a very large house, to create ten or more units of accommodation?</p>	<p>Yes, the requirement of the Policy applies to all developments that provide 10 or more new residential dwellings (gross). <b>No change.</b></p>
Campaign for a Better Harrow Environment	<p>c) Paras 15.10, 15.18 (pages 33 &amp; 34) &amp; elsewhere: The term 'major development' is used here. How is a major development defined?</p>	<p>Major development is defined in the Town and Country Planning Act as development of 10 residential units or 1000sqm or 0.5ha or greater. <b>Provide a footnote giving the definition of 'major development'.</b></p>
Campaign for a Better Harrow Environment	<p><b>2. Population Figures</b> <b>Para 2.1 (page 4):</b> We have already raised the issue of the apparent population increase of 54,200 by 2026 which the Council acknowledges to be incorrect. In view of the existence of more than one estimate of population growth, we suggest</p>	<p>Agreed. <b>Amend paragraph 2.1 as suggested</b></p>

Consultee	Comment Made	Council's Response
	<p>that the first sentence should be deleted and the second sentence amended to read simply:</p> <p>'In Harrow a minimum of 6,050 new homes are planned to be built and 4,000 new jobs created by 2026.'</p>	
<p>Campaign for a Better Harrow Environment</p>	<p><b>3. Viability of Planning Obligations</b> In the list of Requirements for Open Book Appraisals on page 14:</p> <p>a) We are unclear as to what the first bullet point means, viz:</p> <p>'Identify and justify (with comparable evidence where appropriate) all development value and cost variables specify any 'exceptional' cost items with supporting evidence in writing from a reputable cost consultant '</p>	<p>Exceptional cost items include things like remediation of land contamination. They are therefore costs which the vast majority of new development in Harrow would not expect to incur. However, where land is contaminated and requires remediation before the new development to take place, this may add significantly to the cost of the development, and should be included in the development appraisal as an 'exceptional cost item' for that development proposal. Evidence/justification would, in the instance of land contamination, include contamination report detailing the type of contamination, its extent over the proposal sites and breakdown of works required and costs required to mitigate/remedy the contamination. <b>No change.</b></p>
<p>Campaign for a Better Harrow Environment</p>	<p>b) The last bullet point refers to the use of an independent assessor. Has this been used in the past? If so it does not seem to have been very effective in maintaining a reasonable supply of affordable housing.</p> <p>As presently drafted, we consider that this section encourages developers to raise viability concerns. It talks too much about accommodating them by reducing the obligations and not enough about the high priority of affordable housing which should make reductions the exception rather than the rule. For example, para 4.46 should suggest that an alternative option is refusal of an application. Para 6.22 also seems to be overanxious with respect to demanding family housing.</p>	<p>Yes the Council has used independent assessors in the past where the viability issues are complex (e.g. Kodak) to ensure we seek the maximum community benefit from such schemes. However, the greatest influence on affordable housing supply is primarily the level of subsidy or grant being made available. Grant levels have declined significantly under the current government and while the introduction of the 'affordable rent' model has improved development viability, it has not improved supply.</p> <p>Unfortunately, the viability of development remains a significant issue and it is a balancing act for the Council between enabling the development to proceed whilst seeking to maximise both affordable housing and contributions towards local infrastructure. However, it is beyond the scope of the SPD to determine whether applications should be refused if obligations are not offered or provided – this is a judgement to be made considering the merits of the development against all the policy requirements of the Local Plan. <b>No change.</b></p> <p>The priority afforded to affordable family housing is a regional priority for London set out in the London Plan. <b>No change.</b></p>
<p>Campaign for a Better Harrow Environment</p>	<p><b>5. Annual Audit of SPD</b> Para 5.3 describes annual audit of the SPD but does not say what, if anything, will be changed if it fails to deliver affordable housing.</p>	<p>The supplements policies of the Local Plan. The monitoring of the effectiveness of the affordable housing policies of the local plan is done through the Authority's Monitoring Report and schedule in the Core Strategy includes (at page 115) the actions/contingencies the Council will consider should the thresholds for review be triggered. <b>No change.</b></p>

Consultee	Comment Made	Council's Response
Campaign for a Better Harrow Environment	<p><b>6. Formulae for calculating the cost of space requirements</b>            Para 11.9 uses an 'average' value for children's' play space while para 10.7 uses the 'lower end' value for amenity space. Why are they different?</p>	<p>The difference is because of the significant variance in costs in providing amenity open space, whilst costs for the provision of children's play space are fairly uniform and therefore an average value is acceptable. <b>No change.</b></p>
Campaign for a Better Harrow Environment	<p><b>7. Local Economy</b></p> <p>'15.2 The Council's Enterprising Harrow 2007-16 Strategy, Local Economic Assessment 2012/13, and Economic Dashboard 2013 have identified that:</p> <ul style="list-style-type: none"> <li>• local businesses have difficulty finding premises and retaining and attracting skilled people to the local economy</li> <li>• there are pockets of low skilled residents with diminishing job opportunities</li> <li>• the number of economically inactive residents is increasing</li> <li>• there is a downturn in employment growth and limited expected increases in projected employment growth in outer London</li> <li>• There is more retail purchasing by residents outside Harrow's town centres due to competition from existing and new retail locations such as Watford and Westfield at Shepherd's Bush</li> <li>• 27.4% of working age residents are economically inactive</li> <li>• Harrow town centre and Wealdstone District centre are important economic and employment hubs in some parts of the borough, particularly areas of social housing, worklessness is nearly 25%.'</li> </ul> <p>The last bullet point makes no sense!</p>	<p>Agreed as the last bullet point was actually meant to be two bullet points.  <b>Amend the last bullet point as follows:</b></p> <ul style="list-style-type: none"> <li>• <b>Harrow town centre and Wealdstone District centre are important economic and employment hubs;</b></li> <li>• <b>In some parts of the borough, particularly areas of social housing, worklessness is nearly 25%.</b></li> </ul>
Campaign for a Better Harrow Environment	<p><b>8. Local training/job opportunities &amp; use of local suppliers.</b>  <b>Paras 15.6-15.28 (pages 32-35):</b></p> <p>These are vitally important to both the unemployed and the local economy generally. The work involved in the development of a site is necessarily transient, but training and employment opportunities, even short term, can make a real difference to a person's future prospects in the labour market. As we know, so often developers bring in their own teams and suppliers and the</p>	<p>Para 15.7 sets out a range of different employment and training measures. However, depending on the nature of the development, it may not be appropriate to seek all measures, for example the securing of employment premises. Therefore the use of the term 'may' is appropriate. <b>No change.</b></p>

Consultee	Comment Made	Council's Response
	<p>Council seems to quietly acquiesce. The whole section needs beefing up in order to emphasise the importance attached to these issues. For example, para 15.7 states:</p> <p>' ... various employment and training measures may be sought ...'</p> <p>Surely it should say ' will be sought'?</p>	
Highways Agency	No comment.	Noted <b>No change.</b>
Metropolitan Police	<p>We would like to propose that the plan incorporates the following:</p> <p>All development and alterations to the built environment must create safe and secure environments that reduce crime, the fear of crime, anti-social behaviour and fire, with due weight given to the provisions of police 'Secured by Design' standards.</p> <p>In addition we also propose that the following wording is included into the SPD:</p> <p><b><u>Designing out crime and promoting community safety</u></b></p> <p>To gain planning permission, proposals for new development and alterations to the physical environment of the borough must demonstrate how they intend to minimise the risk of crime in a visually acceptable manner and meet the specific security needs of the site. This will be achieved by:</p> <ol style="list-style-type: none"> <li>1. Creating safe and secure environments that reduce the scope for crime and anti-social behaviour;</li> <li>2. Combating the fear of crime in the physical environment;</li> <li>3. Incorporating '<i>Secured by Design</i>' standards recommended by the Association of Chief Police Officers (ACPO) and supported by the Home Office.</li> </ol> <p>Design solutions should include:</p> <ol style="list-style-type: none"> <li>1. Natural surveillance – designing buildings with windows overlooking places such as parks and streets, courtyards and parking areas whilst taking into consideration landscaping, which should not conflict with existing or proposed CCTV or lighting.</li> </ol>	<p>As stated in the supporting text to Policy DM50 "the Council expects most impacts of development to be mitigated through good design and layout, in accordance with Policy DM1". Designing out crime, and in particular the 'Secured by Design' standards, are already a development requirement of the Local Plan. Development design that fails to meet these requirements should be refused as it is not possible to use planning conditions or planning obligations to remedy a proposal's poor design. Obligations relating to community safety are set out in Chapter 13. <b>No change.</b></p>

Consultee	Comment Made	Council's Response
	<ol style="list-style-type: none"> <li>2. Street network designs, pedestrian routes, footpaths and cycle paths that are direct routes with good visibility, that are easy to navigate and permeable. They should avoid creating alleyways, tunnels, hidden alcoves and sharp or blind corners.</li> <li>3. Lighting that illuminates, enabling natural surveillance and good uniformity, avoiding the creation of dark or shadowed areas.</li> <li>4. Clearly defined boundaries between public, semi public, semi private and private spaces, which reduces the likelihood of anti-social behaviour by establishing clear ownership and responsibility for all space in the physical environment.</li> <li>5. Other measures dictated by site context or type of development in line with the minimum standards of '<i>Secured by Design</i>'.</li> </ol> <p><b><u>Reasons</u></b></p> <p>Designing out crime is the process whereby streetscape, open spaces, buildings and transport infrastructure are positively influenced by practical design solutions to reduce the occurrence of crime and provide a safer and more attractive urban environment. Small changes, such as creating well lit spaces that are overlooked, reduces crime and the fear of crime.</p> <p>Creating sustainably safe environments is vital to ensure that those who live in, work in or visit the borough can do so without any unreasonable concern for their safety. It is just as important to address the fear of crime because, whether realistic or not, such a dynamic affects people's perceptions of their safety both at home and in public places.</p> <p>Improving community safety involves designing the urban environment to enable the community to assume an ownership role for the guardianship of their local space. This helps inspire a sense of pride and encourages community use of public spaces and appropriate interfaces with the private realm.</p> <p>PPS1 (paragraph 37) states that in planning for high quality and inclusive design, local authorities should have regard to good practice guides e.g. '<i>Safer</i></p>	



Consultee	Comment Made	Council's Response
	<p><i>Places – The Planning System and Crime Prevention’ (ODPM/Home Office).</i></p> <p>Harrow Council has adopted the ‘Secured by Design’ minimum standards recommended by the Association of Chief Police Officers and the Home Office. ‘Secured by Design’ is the UK Police flagship initiative supporting the principles of ‘<b>designing out crime</b>’ by use of effective crime prevention and security standards for a range of applications. Further information is available at <a href="http://www.securedbydesign.com">www.securedbydesign.com</a></p>	
<p>Kingsfield Estate Resident's Action Group</p>	<p><b>Chapter 2 background page 4,</b>  2.1 Increased population is making Harrow a place that people want to leave. That goes for all of London, which has lost over 200,000 indigenous people, which puts pressure on the surrounding countryside. This may be partly because of the loss of Open Space e.g. building on playing fields, parts of the Green belt and garden grabbing. For example the loss of Kodak's playing fields and parts of the Green Belt. The UK is getting overcrowded, perhaps, the EU needs to look at its policy of free movement. We ask that the plans to increase the population of London are reviewed, to avoid future troubles that surely do not need listing. Local Authorities should pursue this with the Mayor's Office. Growth must be more evenly distributed across the country.</p> <p>We agree with most of page 5 except for the levy on housing under 2.9. Will this increase the cost of housing? Yes, LB's need sources of Income, but this again needs revision. The old rating system had many points in its favour, the housing bands that replaced it needs revising. Many pay less than they would under the old system. Local Authorities need more control over their financial affairs and not be controlled so much by Central Government. At present LB's are too dependent on S106 agreements.</p> <p>We agree with most of the National Policy, London Plan and Local One except where we have already registered dissent However we were very concerned that the Bristol Inspectorate did NOT support the Local Community in its desire to protect the views of Harrow on the Hill.</p>	<p>The comments regarding reviewing Harrow's strategy for managing growth, alongside those regarding overcrowding, are outside the scope of the SPD to address, which is required to supplement Council's adopted policy on planning obligations. <b>No change.</b></p> <p>As set out in Chapter 3 of the SPD, the law prevents the use of obligations to secure financial commitments from new development towards the provision of strategic infrastructure such as schools and healthcare. Therefore, the only effect of Harrow not introducing a CIL charge, would be to lose funding towards strategic infrastructure. NB: the levy is not a rating system, but rather based on detailed evidence of development viability across the Borough alongside the infrastructure requirements of new development. <b>No change.</b></p> <p>This is again beyond the scope of the SPD to address. <b>No change.</b></p>
<p>Kingsfield Estate Resident's Action Group</p>	<p><b>Chapter 4 Procedural Issues.</b>  S106 gives developers far too much leverage in the development processes. To get their way they promise funding for essential community needs that should be met from the Public purse, e.g. schools, park improvements, road building and other needed facilities.</p> <p>4.13 Many consider that the Mayor has too much power over LB's. It seems that empire Builders get elected. The balance of power needs to be adjusted.</p>	<p>Disagree - S106 actually gives the Council the power to seek obligations from development to mitigate their impact on the local environment. <b>No change.</b></p> <p>The ability to control/amend the Mayors current planning powers is beyond the scope of the SPD. <b>No change.</b></p>

Consultee	Comment Made	Council's Response
	<p>4.21 This is of concern; why is the period of repayment so long? Inflation will reduce its value and if all paid initially the Local Authority has the money and there will be no delay in maintenance.</p> <p>4.26 Agree wholeheartedly. Likewise 4. 31 and 4. 34</p> <p>4.41 What is the definition of “potential strategic importance”!? does it include housing?</p> <p>4.43 Requirements for Open Book Appraisals. It is hoped that here there is no chance of back -handers and that the process is absolutely transparent. It I realised that many discussions go on between Developers’ Agents and Council officers.</p> <p>4.61 Has it still to be realised that the better method of housing the low paid is by Council Housing? It is probably cheaper than Housing benefits from what one reads in the media. The Council owns the home as an asset, whatever happens. The private letting landlords are raking in public money. Stop selling Council homes and start building new ones, otherwise London will become the land of the rich and not a taxi, tube driver, or other needed worker, including nurses and teachers, will be around to serve them!</p>	<p>Often, the level of financial contribution received by means of planning obligations, are not in themselves sufficient to deliver the infrastructure and therefore other funding is required either from other developments or from public sources. This can take time and therefore the 10 year period for return of funds is commonly used. <b>No change.</b></p> <p>Agreement is noted. <b>No change.</b></p> <p>These are application that are referable to the Mayor of London under the Town and Country Planning Order 2008 and include proposals for 150 residential units or more; or 15,000sqm of floorspace; or would exceed 30m in height. <b>Add a footnote to provide a link to the 2008 Order.</b></p> <p>The appraisal process is very structured around known building costs and assumed sales values based on local recent sales of similar products. However, most financial data is commercially sensitive so cannot be made public but can be the subject of 3<sup>rd</sup> party independent review, should there be a dispute (see para 4.45 of the SPD). <b>No change.</b></p> <p>The current legislative and national funding mechanisms by which affordable housing is delivered is via private sector development and registered local landlords. In this context the Council is a third party facilitator but not a deliverer or owner of the housing. This is being address to a certain extend through Council’s new powers to manage their receipts from their own housing stock but again this is countered by other government initiatives such as ‘right to buy’, which take social housing out of the Council’s stock. <b>No change.</b></p>
Kingsfield Estate Resident’s Action Group	<p>6.4 Yes, the demand for affordable housing will increase; limiting immigration is surely an option: other countries must surely appreciate our difficulties. Regard the terrible flats near the railway bridges in South Harrow. Pile people high and house them cheaply. Loss of open space will eventually cause resentment to old residents and conflicts with the aims of Public Health. A rethink in policy overall is needed; London is becoming too unpleasant and drives people, who are able to, get out of it.</p> <p>6.6 We are glad that it is acknowledged that low income groups are adversely affected and refer to comments on 4.61</p> <p>6.7 The growth of commercial storage places demonstrates how short people are of space in their homes. It is to be hoped that the so called bedroom tax will go the way of the poll tax.</p> <p>6.8 Council Housing, in the old way, is surely the answer here; stable communities are formed and London will gain from having the low paid workforce it needs and families will stay near each other; this helps the elderly and young parents, as they support each other. Surely the social case</p>	<p>The Council has no ability to limit immigration – such matters are for central government policy, and therefore outside the scope of the SPD. <b>No change.</b></p> <p>The Harrow Local Plan specifically protects existing open space. <b>No change.</b></p> <p>Noted. <b>No change.</b></p> <p>Noted. <b>No change.</b></p> <p>Whilst we agree with the comments, unfortunately the Council is bound by national legislation and a nationally prescribed funding regime for the delivery of affordable housing, which effectively sees Council’s role as being a 3<sup>rd</sup> party facilitator rather than the deliverer of affordable housing in Harrow.</p>

Consultee	Comment Made	Council's Response
	<p>for social housing is proven. Plus rules for Council housing means that homes are of a reasonable size and not rabbit hutches where there is no escape from each other. People need room for hobbies and study, especially as libraries are being lost.( The now lost Civic Library was a place of study for many students who had no quiet place at home)</p> <p>6.10 The social cost of inadequate housing is too great - housing benefit would be better spent on public housing and may well be a lot cheaper. Why cannot Councils overtake partly built flats where developers have failed to complete them and make them Council Housing?</p> <p>6.11 Agree entirely but increase from 60%, but has London to be the only place to build homes? Spread jobs and homes more widely across the country. We agree with the rest of page 19.</p> <p>6.20 Agree.</p> <p>6.23 Three bedroom houses should be the norm. Room sizes must be adequate. It is recorded that Britain has the smallest homes in Europe. Minimum sized rooms must be placed in regulations and adhered to, with penalties if they are not.</p> <p>6.43 Support. It is outrageous that foreigners can buy properties in London and leave them unoccupied and still make money with house price rises. The properties are uncared for and deteriorate – legislation is needed to ensure that all housing is utilised properly. The London Assembly should act on this or get the government to do so.</p> <p>6.44 Do try and not overcrowd sites- it has been proven to lead to conflict. Can we please not learn from past errors. Look at the Elephant and Castle for an example.</p> <p>6.46 Definition of perpetuity please. Understood it is now 35 years?! But this may vary according to who gives the instruction- we speak from experience with St. George's field. What is RP?</p> <p>6.47 Perpetuity is in doubt- to reiterate, let us go back to Council owning properties for rent. A U turn is needed</p>	<p><b>No change.</b></p> <p>See comment directly above. Effectively this comes down to having the funds to purchase the housing, which Harrow Council unfortunately does not have. However, recent changes mean that Council's now have control over their own housing receipts funds and this will in time provide a source of funding to enable the Council to acquire/develop new Council housing. However, this is matter for the Council's Housing Strategy and is therefore beyond the scope of the SPD. <b>No change.</b></p> <p>Noted but the distribution a growth outside of London is a national planning matters that is outside of the scope of this SPD to address. <b>No change.</b></p> <p>Noted Noted</p> <p>The requirement in the Local Plan is for a mix of housing to be provided to provide housing choice. The London Plan includes minimum internal space standards for new residential dwellings. <b>No change.</b></p> <p>Support is noted but as the comments note, limitations of foreign ownership of housing is beyond the scope of the SPD to address. <b>No change</b></p> <p>Para 6.44 relates to review mechanisms for the re-appraisal of development viability once schemes are commenced and therefore does not relate to issues of overcrowding but rather seeking to ensure development delivers the maximum level of affordable housing. <b>No change.</b></p> <p>Perpetuity is not defined as its means in perpetuity and is not limited to a period. RP means Registered Provided, which is given in full in the preceding sentence. <b>No change.</b></p> <p>Noted but is controlled at the national policy level and is therefore outside the scope of the SPD to address. <b>No change.</b></p>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 7 Transport and Highways.</b></p> <p>Traffic in Harrow is denser than ever. Bad driving is on the increase. Harrow was built for a different age. It is now difficult to shop, bank, post a parcel, walk a dog without a car. Improve local shopping areas- once all one's needs</p>	<p>Comments regarding improvements to shopping areas are noted but are outside the scope of the SPD, which seeks solely to ensure Council can mitigate the transport impacts of individual schemes. <b>No change.</b></p>

Consultee	Comment Made	Council's Response
	<p>were met within walking distance.</p> <p>Cycling has to be made safer: cycling routes just disappear and cars are parked on them. Send someone to Holland to see their cycle routes – but money will be needed to enable cyclists to be safer than now. Changing garages to rooms has not helped with many households having 2 plus cars. We need safe routes to essential places such as stations.</p> <p>7.4 7.5 5 Agree.</p> <p>7.7 Support but query the need for shower facilities.</p> <p>7.11 Is this workable? How about the disabled and elderly who need personal transport? Allowance for some groups is surely needed.</p> <p>7.12 Car clubs may well be the answer but maintenance may be expensive. People maltreat cars not their own and have no worries about car insurance claims. Is this practical?</p> <p>Agree with rest of this chapter.</p>	<p>Again the comments regarding cycling facilities are noted but the role of the SPD is simply to secure provision of new cycling routes rather than to specify its design and layout. <b>No change.</b></p> <p>Noted</p> <p>Support is noted and the need for shower facilities is to help promote cycling as an alternative to the car, enabling people to freshen up once at work. <b>No change.</b></p> <p>The controls over parking do not apply to the requirements for development to make provision for disabled car parking on-site. <b>Add footnote to provide clarity on this matter.</b></p> <p>Car clubs are financially sound and models across London are successful. Issues of abuse of vehicles are typically addressed through the user contracts and insurance is covered in the cost of annual fees and use charging rates. <b>No change.</b></p> <p>Noted.</p>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 8 Public Rights of Way</b></p> <p>Support all of this; too often rights of way are made difficult or impossible to negotiate. E.g a notice on Copse Farm in old Redding saying "Private no entry" right beside a public Footpath.</p>	Support is noted. <b>No change</b>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 9 Public and Open Space</b></p> <p>The link to health and access to see and visit open Space has been well proven. We need more open Green Space in Harrow- not less. Kodak is accessible by walking from Central and North Harrow by children and should not be built upon, likewise St. Georges' field and other such green open spaces. Road and other safety reasons make it imperative that space is available near homes under the watchful eye of parents and neighbours. Obesity is a problem solved by exercise as well as diet. So why are we allowing building on any Open Spaces: the LB of Harrow should have the ability to say to the London Assembly a definite NO to building on sports grounds and Open Spaces . London has lost 50 % Of its cricket fields. Build elsewhere – out of London. Stop building a mini country within a country Mr Mayor. There is conflict here between the aims of the Public health department and those of the planners. People need <b>nearby</b> open space in which they can relax, exercise and garden, not space a bus ride away. Making a playing field able to be played on twice a day or more, will do little to help the loss of playing space- especially on winter, short days. It may help</p>	The Harrow Local Plan includes the presumption against the net loss of existing open space. The purpose of Chapter 9 of the SPD is to seek to secure the provision of new open space, should a development proposal lend itself to such provision. While the comments regarding past development approvals are noted, they are outside of the scope of the SPD to re-address. <b>No change.</b>

Consultee	Comment Made	Council's Response
	<p>a little but there is a limit to what a ground can provide. It is short termism. Also, if despite objections you allow this building on open Space, do not allow over 50 % development for a postage stamp sized piece of green space. There must be a limit, such as 30%, or less, according to size of green space.</p> <p>9.3 Cannot agree with this. Give the land to Fields in Trust and they will run it for the community with no cost to the council. Harrow residents need Green Space in major residential and town centres, not more development. Refer to above, Children and people need easily accessible Green Open Space nearby – not a bus ride away. We hope that this is modified or deleted. If it is private and inaccessible then it will become a nature reserve, which can only be good news for sustainability. Stop the Mayor and Assembly from making the London suburbs a place, where those, who need not, chose to live, it will have disastrous country- wide effect.</p> <p>9.4 Agreed.</p>	<p>Often parcels of land include both green space and white development land. In such circumstances, para 9.3 seeks to secure public access to the open space as part of the development of the white land to maximise the community benefit. Ownership of the open space would form part of the discussion about the long-term management of the open space in the context of the overall development scheme. Often it is not possible to seek, as part of the obligation, the relinquishment of existing ownership. <b>No change.</b></p> <p>Noted.</p>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 10- Amenity Space</b></p> <p>10.1 A great idea, but we need them close to where people live. Where is the land available? If it at the cost of allowing development on a large part of it to obtain it, residents might prefer the open space just to look at and be a nature reserve.</p> <p>10.2 Agreed: many recent flats appear to have no amenity space at all!</p> <p>10.3 A figure please and a definition of "adequate amenity space".</p> <p>10.4 Agreed – let us not build tomorrow's slums.</p> <p>10.5 A FIVE square metre is pathetic. It is assumed that this means an area of 2.5 times 2.5 = One 5 metre of space. it is hardly room for a table and 2 chairs and a potted plant or two. It is less than many a patio. Growing their own vegetables will be a dream only.</p> <p>10.6 How will there be <i>allowed access</i> to a local park? All have access to a park if it is nearby! This is not practical surely? Will these dwellings be for children? Have we learnt any lessons from past errors at all? If a parent is on the upper floors how does one overlook outdoor play of a toddler? We are building to-morrow's slums and places of unrest. Where will a boy mend his bike and a girl push her doll's pram?</p> <p>10.8 This is good but please remember that toddlers need open, secure places to play and not spend their time in front of a T.V. Surely the aims of Public Health clash with this policy if insufficient play space is NOT available.</p>	<p>As stated at paras 10.2 – 10.5, the policy requirement is for the provision of amenity space on the development site. Only where this cannot be accommodated, should off-site contributions or provision be considered. Any financial contribution will be used to improve the quality of local parks that serve the development site. <b>No change.</b></p> <p>Noted</p> <p>The standard of amenity space provision is given in para at 10.5. <b>No change.</b></p> <p>Noted</p> <p>This is the agreed standard for London and the Council has no local evidence on which to prescribe an alternative standard. No change.</p> <p>Para 10.6 is about using any commuted sum to improve access to and use of local parks for all residents of the proposed development. The para makes no reference to 'allowed access', so it is unclear what is meant by the respondent. The requirement for on-site amenity space provision is to provide for outdoor activities associated with a residential dwelling such as those mentioned by the respondent. So it is again unclear what the comment is in respect of. <b>No change.</b></p> <p>Chapter 11 of the SPD deals specifically with the provision of children's play space, whilst chapter 10 is only concerned with amenity space – the two are very different. <b>No change.</b></p>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 11 Children's Play Space</b></p> <p><b>Not the Playing fields of Eton or Harrow then for the poor?</b> Please revise this figure to what the Fields in Trust recommend. Otherwise we will be storing up</p>	<p>Fields in Trust is a national standard that the Council does not consider can be reasonably met in the urban context of Harrow where land is a finite resource that we need to balance and maximise the use of for all requirements. A</p>

Consultee	Comment Made	Council's Response
	<p>trouble for society; better for energy to be expended on a football field than it being spent on antisocial behaviour.</p> <p>11.2. Hurrah – agree.</p> <p>11.4. Can we add the word SAFE to onsite children's play place. But toddlers still need <i>private play space, within parental supervision.</i></p> <p>11.6 Surely, it would be better just to make gardens bigger- big enough for a trampoline, sandpit, swings and a space to knock a ball around. A set play space 100 metres away would be good only for teenagers who can stick up for themselves. We asked for one on the Kingsfield Estate_ never got it.</p> <p>11.7 Are there no child friendly planners out there? 4metres square per child or is it 2metre by 2 metres? Realists or not, surely we can insist on a better deal for our children. Another reason why Developing should only be done by Councils, with a social conscience, who do not have to satisfy shareholders.. Many estates have notices up “ No Ball Games Allowed”. There are many on walls just made for ball games with tennis balls.</p> <p>11.9 Child yields will vary – they will go up and they will go down, according to the age of the inhabitants – so it is hoped that the figure will be high enough to account for this. There is a baby boom at the moment – a maximum figure must be set, if the children have plenty of space because the birth rate drops, that can only be good.</p>	<p>requirement of 15sqm per child would sterilise the opportunity to secure additional open space for sports, nature conservation or for allotments etc, all of which also have significant area requirements. <b>No change.</b></p> <p>Noted</p> <p>The intention of the SPD is to secure the obligation not to specify matters of design that are all ready adequately provided for in other guidance. <b>No change.</b></p> <p>See comments above re balancing and maximising the use of land. <b>No change</b></p> <p>The 4sqm standard needs to be seen in the context of Harrow's existing 1.8sqm per child provision. It therefore represents more than double the current level of provision. Comments re ‘No ball games allowed’ are noted but this also relates to residential amenity impacts and why Council's preference is to design space into development specifically for such active uses or to make improvements to local play space to better accommodate them. <b>No change.</b></p> <p>The Council considers that the child yields are robust. These are based on a number of independent studies taken of developments a number of years after their initial occupation to profile average child populations of established developments based on different housing types and tenures. <b>No change.</b></p>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 12 Public Art</b></p> <p>Totally supported. It is to be hoped that local artists especially will be used.</p>	<p>The support is noted.</p>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 13 Community Safety</b></p> <p>13.1 Totally supported but also needed are facilities for teenage activities of different kinds. Bored teenagers look for mischief. We have lost a bowling alley, what indoor facilities will there be for the young and what cultural ones for the more mature. A decent sized hall for mixed attractions is badly needed in Harrow/Wealdstone. The writer has seen the loss of most cinemas, 2 theatres (Kodak and Harrow Coliseum), many halls attached to pubs and other Kodak facilities that were available for public use.</p>	<p>Strategic community facilities such as leisure centres and community halls etc are to be provided for through Harrow's Community Infrastructure Levy as they serve the wider population not just the residents of a development. Bowling alleys and cinemas are not community infrastructure but rather commercial developments and therefore not appropriate to a planning obligation or CIL for provision. <b>No change.</b></p>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 14 Historic Environment.</b></p> <p>Supported. Many lovely buildings have been destroyed, let us lose no more.</p>	<p>Support is noted.</p>
Kingsfield Estate Resident's Action	<p><b>Chapter15 Employment and Training</b></p> <p>Can we not insist on reintroducing Youth Employment centres locally?</p>	<p>These comments are beyond the scope of the consultation on SPD. <b>No change.</b></p>

Consultee	Comment Made	Council's Response
Group	<p>15.2 Harrow has lost too much industry. The Kodak site should have remained an Industrial site instead of for housing. Was any effort made to find another industry that could have utilised the site?</p> <p>The figure of unemployed working age residents is of concern, especially if they are employable. Have we an Officer in the Council whose job is to seek out industrial players? We have a workforce it seems, the Kodak site, and good railway connections and proximity to London. A brewery, Dysons, pharmaceutical firm, engineering, textiles, chemicals, were they sought? We have lost so much in Harrow and it is to be wondered if Harrow is at fault here? There is a definite loss of Employers.</p> <p>Central Harrow is not attractive to shop in at the moment. There is conflict between traffic and pedestrians and an unpleasant environment. Only investment will change that. Parking is expensive and there are too many vigilant Parking Attendants. Better shops are needed to attract people, we need a replacement of Somertons. Debenhams has narrowed its range of merchandise e.g. china and cutlery and haberdashery – perhaps a rethink on their part may help.</p> <p>15.4 What is needed is a new Industrial Revolution and new industry and ideas. Stop importing so much and make more at home e.g. kettles, saucepans, clothes, knitwear, electrical goods. Engineers are required to make things and less shop assistants selling imported goods.</p> <p>15.5 Skills and developments – good if the developers give apprenticeships in bricklaying, plastering and so forth to local youngsters as promised in 15.10?</p> <p>15.13. Apprenticeships in other skills needed, e.g. electronics ( we once had Marconi didn't we?)</p> <p>It seems that we are too dependent on big Developers for money to train the young. Once Harrow had many small builders, there were 3 in Headstone Road/Harrow View and many in Lowlands Road, plus many others scattered around- all gone- as the ground was worth more with planning permission for a housing project. Permission was given without thought for the lost jobs.</p>	<p>This is the intention of the obligation sought by the SPD. <b>No change.</b></p> <p>The obligation has to relate to the impacts of the development. Therefore skills training in electronics would not be appropriate to development in Harrow, and therefore legally we could not require it. <b>No change.</b></p> <p>Noted but again outside of the scope of the SPD to address. <b>No change.</b></p>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 16 Sustainable Design and Construction</b></p> <p>Harrow Environmental Forum supports everything that helps to preserve this planet and reduce climate change. It just wishes that it did not have to depend constantly on s106 agreements. The next generation will face many difficulties that we have caused; we owe it to them to mitigate those difficulties. Therefore, we agree with this policy and all of Chapter 17</p>	Support is noted
Kingsfield Estate Resident's Action	<p><b>Chapter 18 Flood Risk</b></p> <p>Harrow is a critical flood area. The amount of front gardens disappearing</p>	Noted but again it is beyond the scope of the SPD to address the development of front gardens, especially retrospectively. <b>No change</b>

Consultee	Comment Made	Council's Response
Group	<p>under various coverings is to be deplored. The Mayor is being busy planting trees, whilst many are uprooted from front gardens. Every front garden should have greenery, by law- it absorbs dangerous PM 10 particles and returns oxygen to the air after absorbing carbon dioxide. Sustainability is talked about but not sufficiently practised. Is Harrow being vigilant enough? Again, flood risk mitigation measures are all too dependent on s 106 agreements. Should they be is the question? Too many flood pictures appear now on TV. The Government and the London Assembly must seriously address this. Floods probably cost more money than their prevention.</p>	<p>Planning obligations are key source of delivery and funding for on and off-site flood mitigation works to benefit the development site as well as existing developments within the flood catchment. The Council agrees that further central funding for flood mitigation should be given by the regional and central government but again this is outside the scope of the SPD to address.</p> <p><b>No change.</b></p>
Kingsfield Estate Resident's Action Group	<p><b>Chapter 19 Biodiversity</b>  St George's Field, Headstone, did not have an Environmental Impact Assessment: it has cost the Community dearly to pay for this omission. It was Eric Pickles department that told us we had a case. Can the Council assure the Public that no open spaces will be built upon without an EIA? .  Harrow is all talk and no action on many biodiversity issues. Wild animal life is disappearing, especially bird life. Bats are in peril on St. George's field. Hedgehogs, once a common sight in gardens, are rarely, if ever, seen. Insect and amphibian life is also in peril as habitat disappears under bricks and mortar- and that includes front gardens.  While local authorities are dependent on developers for s 106 monies to preserve biodiversity is it going to happen? Many think not. Gone are the days when a local authority can fund the buying of a field. If we are not careful, London will have little or none wild life because s 106 was insufficient. Therefore 19.5 and 19.6 are pipe dreams. If a Developer does find a crested newt on the land he will probably kill it, so he can build on it.</p>	<p>While the comments are noted these go beyond the scope of the consultation on planning obligations. <b>No change.</b></p>
Mayor of London	<p><b>Housing</b>  As discussed with you on 2 September 2013, the Harrow Planning Obligations and Affordable Housing SPD includes a reference to the Council's Tenancy Strategy within paragraph 6.17. Having reviewed the Tenancy Strategy, my officers note that this document details suggested rent caps for affordable rented housing. As you are aware, the Mayor is keen to ensure that rent caps are not imposed via planning policy.</p> <p>Whilst it is acknowledged that rent caps are not explicitly included within the SPD, GLA officers are of the view that the current referencing of the Tenancy Strategy within the document constitutes an attempt to bring rent caps into the planning system. Such an approach is not in general conformity with the</p>	<p>Following further discussion with GLA officers the Council has agreed to <b>delete that section of the SPD and the reference to the Council's adopted Tenancy Strategy.</b></p>



Consultee	Comment Made	Council's Response
	<p>London Plan and the Revised Early Minor Alterations - which are clear that rent caps should not be imposed as they impede the maximisation of affordable housing delivery. In line with meeting discussions, GLA officers also query the wording of paragraph 6.18 - which appears to suggest that the Council is seeking to impose rent controls through the development management process.</p> <p><u>Resolving the matter</u> Having discussed the above issue with the Harrow Place Shaping Team and Harrow Housing Team, GLA officers welcome the Council's agreement on 17 September 2013 to remove all reference to the Harrow Tenancy Strategy within the Planning Obligations and Affordable Housing SPD. This will ensure that rent caps are not introduced into Harrow's Local Plan. In line with the agreed resolution, the Council has undertaken to delete paragraphs 6.15 through to 6.19 of the SPD, and to remove any footnotes/references associated with these paragraphs. This is supported, and subject to the above modifications, GLA officers are satisfied that the SPD is in general conformity with the London Plan.</p>	
Mayor of London	<p><b>Climate change</b> As recently discussed, the Council is invited to consider using this SPD as a vehicle for establishing planning obligations to off-set carbon dioxide emissions where the targets set out in the London Plan are not met. Further information on this approach, including advice with respect to setting a localised cost per unit of carbon dioxide, is provided within the Mayor's draft revised Sustainable Design and Construction SPG. This SPG is available to review on the GLA website here: <a href="http://www.london.gov.uk/priorities/planning/consultations/draft-sustainable-design-and-construction">www.london.gov.uk/priorities/planning/consultations/draft-sustainable-design-and-construction</a>, and is open for public consultation until 21 October 2013. GLA officers would welcome the opportunity to discuss this further with the Council if/as required.</p>	Unfortunately, the Council considers it too late in the day to consider introducing a carbon off-setting obligation. However, the SPD will be subject to regular review, providing the opportunity to include such an approach in the future. <b>No change.</b>
Harrow Environmental Forum	<p>Chapter 2 background page 4, 2.1 Increased population is making Harrow a place that people want to leave. That goes for all of London, which has lost over 200,000 indigenous people, which puts pressure on the surrounding countryside. This is due to the loss of Open Space e.g. building on playing field and parts of the Green belt. An example is Kodak's playing fields. We find the CIL on "net additional space" to be unclear. What effect will this have on (presumably only new) developments.</p>	<p>The comments regarding reviewing Harrow's strategy for managing growth, alongside those regarding overcrowding, are outside the scope of the SPD to address, which is required to supplement Council's adopted policy on planning obligations. <b>No change.</b></p> <p>The CIL legislation dictates that CIL is payable only on the net increase in floorspace – this is not set by the Council. Details on the operation of the CIL are provided on the Council's website.</p>

Consultee	Comment Made	Council's Response
	<p>We were very concerned that the Bristol Inspectorate did NOT support the Local Community in its desire to protect the views of Harrow on the Hill. London Plan, 3.8</p> <p>Customers for small shops and local retail require adequate car parking without prohibitive charges. The Government Minister, Eric Pickles, suggestion of a short, penalty free time is a necessary step to local shopping, and should be considered.</p>	<p>This is beyond the scope of the SPD to address. <b>No change.</b></p> <p>This is again beyond the scope of the SPD to address. <b>No change.</b></p>
<p>Harrow Environmental Forum</p>	<p><b>Chapter 4 Procedural Issues.</b></p> <p>4.9 If developer is forced to increase size/volume of the development (result in underdevelopment”), why should CIL be applied to this increase?</p> <p>4.21 This is of concern; why is the period of repayment so long? Inflation will reduce its value and if all paid initially the Local Authority has the money and there will be no delay in maintenance.</p> <p>4.41 What is the definition of “potential strategic importance”!? does it include housing?</p> <p>4.52 Who pays for the independent expert?</p> <p>4.61 Has it still to be realised that the better method of housing the low paid is by Council Housing.</p>	<p>Para 4.9 addresses the situation where a developer may seek to develop out a large site in parcels, thereby trying to avoid development thresholds such as affordable housing, which applies to developments of 10 or more residential dwellings. Likewise some developers will promote a scheme for 9 units when the site can accommodate 10 or more units but to do so would then trigger the requirement for affordable housing. To ensure developers do not seek to circumvent the required policy requirements, the SPD clarifies that, in such instances, the Council will consider the site in its entirety and its development capacity. The application of CIL is not a primary issue in this respect. <b>No change.</b></p> <p>Often, the level of financial contribution received by means of planning obligations, are not in themselves sufficient to deliver the infrastructure and therefore other funding is required either from other developments or from public sources. This can take time and therefore the 10 year period for return of funds is commonly used. <b>No change.</b></p> <p>Agreement is noted. <b>No change.</b></p> <p>These are application that are referable to the Mayor of London under the Town and Country Planning Order 2008 and include proposals for 150 residential units or more; or 15,000sqm of floorspace; or would exceed 30m in height. <b>Add a footnote to provide a link to the 2008 Order.</b></p> <p>The cost of an independent appraisal is met by the developer. <b>No change.</b></p> <p>The current legislative and national funding mechanisms by which affordable housing is delivered is via private sector development and registered local landlords. In this context the Council is a third party facilitator but not a deliverer or owner of the housing. This is being address to a certain extend through Council's new powers to manage their receipts from their own housing stock but again this is countered by other government initiatives such as 'right to buy', which take social housing out of the Council's stock. <b>No change.</b></p>
<p>Harrow Environmental Forum</p>	<p>6.6 We are glad that it is acknowledged that low income groups are adversely affected.</p> <p>6.11 A definition of “intermediate housing products” would be helpful.</p>	<p>Noted</p> <p><b>Add footnote on the definition of 'intermediate housing products'</b></p>

Consultee	Comment Made	Council's Response
	<p>Without this the 60% - 40% figures we cannot comment on.</p> <p>6.23 Three bedroom houses should be the norm. Room sizes must be adequate. It is recorded that Britain has the smallest homes in Europe. Minimum sized rooms must be placed in regulations and adhered to, with penalties if they are not.</p> <p>6.26 If the land value is deemed too high who decides this? Will the developer proceed if the land value is not agreeable?</p> <p>6.30 Please define "mixed-use" to avoid any misunderstanding</p> <p>6.46 Definition of perpetuity please. Understand it is now 35 years?! What is RP?</p>	<p>The requirement in the Local Plan is for a mix of housing to be provided to provide housing choice. The London Plan includes minimum internal space standards for new residential dwellings. <b>No change.</b></p> <p>The purpose of undertaking a viability appraisal is to determine whether the costs of the proposed development are reasonable. If a developer has paid too much for the land, and cannot therefore afford to meet the policy requirements of the Local Plan, then the appraisal will highlight this and enable the Council to refuse the application on the grounds that the application does not represent a sustainable development as it is unable to mitigate its impacts. <b>No change</b></p> <p>Mixed use is a development that comprises more than one form of land use (e.g. office and retail uses within the same building or development) <b>Add footnote to this effect.</b></p> <p>Perpetuity is not defined as its means in perpetuity and is not limited to a period. RP means Registered Provided, which is given in full in the preceding sentence. <b>No change.</b></p>
<p>Harrow Environmental Forum</p>	<p><b>Chapter 7 Transport and Highways.</b></p> <p>Traffic in Harrow is denser than ever. Bad driving is on the increase. Harrow was built for a different age. It is now difficult to shop, bank, post a parcel, walk a dog without a car. Improve local shopping areas- once all one's needs were met within walking distance.</p> <p>Cycling has to be made safer: cycling routes just disappear and cars are parked on them. We need safe routes to essential places such as stations.</p> <p>7.7 Query the need for shower facilities.</p> <p>Double yellow lines outside GP surgeries are not necessary in most cases and appear to be there solely for revenue purposes. Elderly, disabled and sick patients cannot be expected to attend on cycles or bus.</p> <p>7.8 Vague. Open to wide interpretation.</p> <p>7.9 In-depth local consultation is vital.</p> <p>7.11 Is this workable? How about the disabled and elderly who need personal</p>	<p>Comments regarding improvements to shopping areas are noted but are outside the scope of the SPD, which seeks solely to ensure Council can mitigate the transport impacts of individual schemes. <b>No change.</b></p> <p>Again the comments regarding cycling facilities are noted but the role of the SPD is simply to secure provision of new cycling routes rather than to specify its design and layout. <b>No change.</b></p> <p>The need for shower facilities is to help promote cycling as an alternative to the car, enabling people to freshen up once at work. <b>No change.</b></p> <p>The comments regarding double yellow lines are noted but are outside of the control of the SPD. <b>No change.</b></p> <p>Para 7.8 provides a list of potential Highways works that may be required of development. We agree that is open to wide interpretation as the intention is to mitigate the impacts of a specific development proposal, and these may vary widely depending on how the development site is to interact with the public highway and the conditions of the highway at that particular location. <b>No change</b></p> <p>Noted</p> <p>All are practical and workable propositions which the Council has already</p>

Consultee	Comment Made	Council's Response
	<p>transport? Allowance for some groups is surely needed. Car owners are being victimised by Councils – Govt. Minister Eric Pickles. See 3.8 also.</p> <p>7.12 Car clubs may well be the answer but maintenance may be expensive. People maltreat cars not their own and have no worries about car insurance claims. Is this practical?</p>	<p>secured in previous s106 agreements. It should however be noted that the controls over parking do not apply to the requirements for development to make provision for disabled car parking on-site. <b>Add footnote to provide clarity on this matter.</b></p> <p>Allowances can be made for some groups but again the purpose of the use of obligations are to mitigate impacts, so such impacts would need to be taken into account and Council would need to agree that they were acceptable without mitigation. <b>No change.</b></p> <p>Car clubs are financially sound and models across London are successful. Issues of abuse of vehicles are typically addressed through the user contracts and insurance is covered in the cost of annual fees and use charging rates. <b>No change.</b></p>
Harrow Environmental Forum	<p><b>Chapter 8 Public Rights of Way</b> Support all of this; too often rights of way are made difficult or impossible to negotiate.</p>	Support and comments are note
Harrow Environmental Forum	<p><b>Chapter 9 Public and Open Space</b> The link to health and access to see and visit open Space has been well proven. We need more open Green Space in Harrow- not less. Kodak is accessible by walking from central Harrow by children and should not be built upon. Making a playing field able to be played on twice a day or more, will do little to help the loss of playing space- especially on winter short days. It may help a little but there is a limit to what a ground can provide. It is short termism. Also, if despite objections you allow this, do not allow over 50 % development for a postage stamp sized piece of green space. There must be a limit, such as 30%, or less, according to size of green space.</p>	<p>The Harrow Local Plan includes the presumption against the net loss of existing open space. The purpose of Chapter 9 of the SPD is to seek to secure the provision of new open space, should a development proposal lend itself to such provision. While the comments regarding past development approvals are noted, they are outside of the scope of the SPD to re-address. <b>No change.</b></p>
Harrow Environmental Forum	<p><b>Chapter 10- Amenity Space</b> 10.1 A great idea, but we need them close to where people live. Where is the land available? If it at the cost of allowing development on a large part of it to obtain it, residents might prefer the open space just to look at and be a nature reserve. 10.3 A figure please and a definition of “adequate amenity space”.  10.5 A FIVE square metre is pathetic. It is hardly room for a table and 2 chairs and a potted plant or two. It is less than many a patio. Growing their own vegetables will be a dream only. 10.6 Unclear how a “commuted sum” may improve access to local parks.</p>	<p>As stated at paras 10.2 – 10.5, the policy requirement is for the provision of amenity space on the development site. Only where this cannot be accommodated, should off-site contributions or provision be considered. Any financial contribution will be used to improve the quality of local parks that serve the development site. <b>No change.</b></p> <p>The standard of amenity space provision is given in para at 10.5. <b>No change.</b> Noted This is the agreed standard for London and the Council has no local evidence on which to prescribe an alternative standard. <b>No change.</b></p> <p>Funding could be used to provide a new entrance to the park or by improving the surfacing within the park making it more accessible to a wider portion of the population.</p>

Consultee	Comment Made	Council's Response
	10.8 This is good but please remember that toddlers need open, secure places to play and not spend their time in front of a T.V. Surely the aims of Public Health clash with this policy if insufficient play space is NOT available.	Chapter 11 of the SPD deals specifically with the provision of children's play space, whilst chapter 10 is only concerned with amenity space – the two are very different. <b>No change.</b>
Harrow Environmental Forum	<p><b>Chapter 11 Children's Play Space</b></p> <p>11.4. Can we add the word SAFE to onsite children's play place. But toddlers still need <i>private play space, within parental supervision.</i></p> <p>11.7 4 metres square per child or is it 2 metres by 2 metres? Seems low. If the Mayor's guidance sets a 10 m2, surely 4m2 is inadequate.</p>	<p>The intention of the SPD is to secure the obligation not to specify matters of design that are all ready adequately provided for in other guidance. <b>No change.</b></p> <p>The 4sqm standard needs to be seen in the context of Harrow's existing 1.8sqm per child provision. It therefore represents more than double the current level of provision. To require developers to provide significantly in excess of this is likely to fail the legal tests for securing obligations (see para 3.5) – namely the requirement for obligations to be fairly and reasonably related in scale and kind to the development. <b>No change.</b></p>
Harrow Environmental Forum	<p><b>Chapter 12 Public Art</b></p> <p>Totally supported. It is to be hoped that local artists especially will be used.</p>	Support is noted
Harrow Environmental Forum	<p><b>Chapter13 Community Safety</b></p> <p>13.1 Totally supported but also needed are facilities for teenage activities of different kinds. Bored teenagers look for mischief. We have lost a bowling alley, what indoor facilities will there be for the young and what cultural ones for the more mature. A decent sized hall for mixed attractions is badly needed in Harrow/Wealdstone. The writer has seen the loss of most cinemas, 2 theatres( Kodak and Harrow Coliseum), many halls attached to pubs and other Kodak facilities that were available for public use.</p>	<p>Strategic community facilities such as leisure centres and community halls etc are to be provided for through Harrow's Community Infrastructure Levy as they serve the wider population not just the residents of a development. Cinemas, and to a certain extent, theatres, are not community infrastructure but rather commercial developments and therefore not appropriate to a planning obligation or CIL for provision. <b>No change.</b></p>
Harrow Environmental Forum	<p><b>Chapter 14 Historic Environment.</b></p> <p>Supported. Many lovely buildings have been destroyed, let us lose no more</p>	Support is noted
Harrow Environmental Forum	<p><b>Chapter15 Employment and Training</b></p> <p>15.2 Harrow has lost too much industry. The Kodak site should have remained an Industrial site instead of for housing. Was any effort made to find another industry that could have utilised the site?</p> <p>The figure of unemployed working age residents is of concern, especially if they are employable. Have we an Officer in the Council whose job is to seek out industrial players? We have a workforce it seems, the Kodak site, and good railway connections and proximity to London. A brewery, pharmaceutical firm, engineering, textiles, chemicals, were they sought? We have lost so much in Harrow and it is to be wondered if Harrow is at fault here? There is a definite loss of Employers.</p> <p>Central Harrow is not attractive to shop in at the moment. There is conflict between traffic and pedestrians and an unpleasant environment. Only</p>	These comments are beyond the scope of the consultation on SPD. <b>No change.</b>

Consultee	Comment Made	Council's Response
	<p>investment will change that. Parking is expensive and there are too many over-vigilant Parking Attendants. Better shops are needed to attract people.</p> <p>15.5 Skills and developments – good if the developers give apprenticeships in bricklaying, plastering and so forth to local youngsters as promised in 15.10?</p> <p>15.13. Apprenticeships in other skills needed, e.g. electronics.</p>	<p>This is the intention of the obligation sought by the SPD. <b>No change.</b></p> <p>The obligation has to relate to the impacts of the development. Therefore skills training in electronics would not be appropriate to development in Harrow, and therefore legally we could not require it. <b>No change.</b></p>
<p>Harrow Environmental Forum</p>	<p><b>Chapter 16 Sustainable Design and Construction</b></p> <p>Harrow Environmental Forum supports everything that helps to preserve this planet and reduce climate change. It just wishes that it did not have to depend constantly on s106 agreements. The next generation will face many difficulties that we have caused; we owe it to them to mitigate those difficulties.</p>	<p>Support is noted</p>
<p>Harrow Environmental Forum</p>	<p><b>Chapter 18 Flood Risk</b></p> <p>Harrow is a critical flood area. The amount of front gardens disappearing under various coverings is to be deplored. The Mayor is being busy planting trees, whilst many are uprooted from front gardens. Every front garden should have greenery, by law- it absorbs dangerous PM 10 particles and returns oxygen to the air after absorbing carbon dioxide. Sustainability is talked about but not sufficiently practised.</p> <p>Again, flood risk mitigation measures are all too dependent on s 106 agreements.</p>	<p>Noted but again it is beyond the scope of the SPD to address the development of front gardens, especially retrospectively. <b>No change</b></p> <p>New development increases the risk of flooding and therefore it is appropriate to use planning obligations to mitigate this potential impact. <b>No change.</b></p>
<p>Harrow Environmental Forum</p>	<p><b>Chapter 19 Biodiversity</b></p> <p>St George's Field, Headstone, did not have an Environmental Impact Assessment: it has cost the Community dearly to pay for this omission. It was Eric Pickles department that told us we had a case. Can the Council assure the Public that no open spaces will be built upon without an EIA? Harrow refused to withdraw the planning permission to build on this Greenfield site so a court case is needed.</p> <p>Harrow is all talk and no action on many biodiversity issues. Wild animal life is disappearing , especially bird life. Bats are in peril on St. George's field. Hedgehogs, once a common sight in gardens, are rarely, if ever seen. Insect and amphibian life is also in peril as habitat disappears under bricks and mortar- and that includes front gardens.</p>	<p>While the comments are noted these go beyond the scope of the consultation on planning obligations. <b>No change.</b></p>

## Appendix 1 – Consultation Notice and Public Notice

Planning and Compulsory Purchase Act 2004  
The Town and Country Planning (Local Development) (England) Regulations 2012

### Harrow Planning Obligations Supplementary Planning Document Regulation 12: Public Participation Regulation 13: Representations on Supplementary Planning Documents

Harrow Council is planning to introduce its Community Infrastructure Levy (CIL) on 1<sup>st</sup> October 2013. Harrow's CIL is intended to contribute towards the funding of strategic infrastructure required to support growth, including healthcare facilities, schools and public transport enhancements. However, planning obligations (s106 Agreements) will remain to secure affordable housing provision as well as to mitigate site specific impacts made necessary by the proposal, ensuring the development is acceptable in planning terms.

The SPD will supplement adopted Development Management Policy DM50. The purpose of the SPD is to therefore to help clarify the role between CIL and planning obligations and to clarify the types of planning obligations that the Council may seek in addition to CIL depending on the nature of the development proposal and site circumstances. It is also intended to help applicants to make successful applications by clearly outlining the Council's procedures for the negotiation of obligations alongside the Council's consideration of the planning application.

The draft SPD is published for public consultation from **11<sup>th</sup> July to 5<sup>th</sup> September 2013**. A copy of the draft SPD is available to view at Harrow Civic Centre and at each of the Borough's libraries (see table below). It can also be viewed via the Council's website:

[www.harrow.gov.uk/spd](http://www.harrow.gov.uk/spd)

Representations on the draft SPD may be sent to the following postal and e-mail addresses:

Local Plans Team  
Harrow Council  
Room 301, Civic Centre  
Station Road  
Harrow  
HA1 2XF  
[ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)

The draft SPD is also available to view via the Council's online consultation portal. Representations may also be made via the portal:

<http://harrow.limehouse.co.uk/portal/>

The closing date for representations is **5pm on Thursday 5<sup>th</sup> September 2013**.

Address	Opening Times	Address	Opening Times
<b>Civic Centre Reference Library</b> Station Road, Harrow, HA1 2UU	Mon- Thurs 9.30am – 8.00pm Fri 9.30am – 5.30pm Sat 9.00am – 5.00pm	<b>Pinner Library</b> Marsh Road, Pinner HA5 5NQ	Mon 9.00am – 5.30pm Tues, Thurs 9.00am – 8.00pm Weds Closed Fri 9.00am – 1.00pm Sat 9.00am – 5.00pm
<b>Gayton Central Lending Library</b> Garden House, 5 St John's Road, Harrow, HA1 2EL	Mon- Thurs 9.30am – 8.00pm Fri 9.30am – 5.30pm Sat 9.00am – 5.00pm	<b>Rayners Lane Library</b> 228 Imperial Drive, Rayners Lane, HA2 7HJ	Mon 9.00am – 5.30pm Tues, Thurs 9.00am – 8.00pm Weds Closed Fri 9.00am – 1.00pm Sat 9.00am – 5.00pm
<b>Bob Lawrence</b>	Mon 9.00am – 5.30pm	<b>Roxeth Library</b>	Mon 9.00am – 5.30pm

<b>Library</b> 6-8 North Parade, Mollison, Way, Edgware, HA8 5QH	Tues, Thurs 9.00am – 8.00pm Weds Closed Fri 9.00am – 1.00pm Sat 9.00am – 5.00pm	<b>Northolt Road, South Harrow, HA2 8EQ</b>	Tues, Thurs 9.00am – 8.00pm Weds Closed Fri 9.00am – 1.00pm Sat 9.00am – 5.00pm
<b>Hatch End Library</b> Uxbridge Road, Hatch End HA5 4EA	Mon 9.00am – 5.30pm Tues, Thurs 9.00am – 8.00pm Weds Closed Fri 9.00am – 1.00pm Sat 9.00am – 5.00pm	<b>Stanmore Library</b> 8 Stanmore Hill, Stanmore, HA7 3BQ	Mon 9.00am – 5.30pm Tues, Thurs 9.00am – 8.00pm Weds Closed Fri 9.00am – 1.00pm Sat 9.00am – 5.00pm
<b>Kenton Library</b> Kenton Lane, Kenton, HA3 8UJ	Mon 9.00am – 5.30pm Tues, Thurs 9.00am – 8.00pm Weds Closed Fri 9.00am – 1.00pm Sat 9.00am – 5.00pm	<b>Wealdstone Library</b> The Wealdstone Centre, 38/40, High Street, Wealdstone, HA3 7AE	Mon 9.00am – 5.30pm Tues, Thurs 9.00am – 8.00pm Weds Closed Fri 9.00am – 1.00pm Sat 9.00am – 5.00pm
<b>North Harrow Library</b> 429-433 Pinner Road, North Harrow, HA1 4NH	Mon 9.00am – 5.30pm Tues, Thurs 9.00am – 8.00pm Weds Closed Fri 9.00am – 1.00pm Sat 9.00am – 5.00pm	<b>Harrow Civic Centre</b> (duty planner office) Station Road Harrow HA1 2XF	Mon-Fri 9.00am - 5.00pm

If you have any queries please email [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) or contact the Local Plans Team on tel. 020 8736 6082.

**Matthew Paterson**  
Head of Planning Policy  
3<sup>rd</sup> July 2013

Planning and Compulsory Purchase Act 2004  
The Town and Country Planning (Local Development) (England) Regulations 2012

**Harrow Planning Obligations Supplementary Planning Document**  
**Regulation 12: Public Participation**  
**Regulation 13: Representations on Supplementary Planning Documents**

Harrow Council is planning to introduce its Community Infrastructure Levy (CIL) on 1<sup>st</sup> October 2013. Harrow's CIL is intended to contribute towards the funding of strategic infrastructure required to support growth, including healthcare facilities, schools and public transport enhancements. However, planning obligations (s106 Agreements) will remain to secure affordable housing provision as well as to mitigate site specific impacts made necessary by the proposal, ensuring the development is acceptable in planning terms.

The SPD will supplement adopted Development Management Policy DM50. The purpose of the SPD is to therefore to help clarify the role between CIL and planning obligations and to clarify the types of planning obligations that the Council may seek in addition to CIL depending on the nature of the development proposal and site circumstances. It is also intended to help applicants to make successful applications by clearly outlining the Council's procedures for the negotiation of obligations alongside the Council's consideration of the planning application.

The draft SPD is published for public consultation from 11<sup>th</sup> July to 5<sup>th</sup> September 2013. A copy of the draft SPD is available to view at Harrow Civic Centre and at each of the Borough's libraries. It can also be viewed via the Council's website:

[www.harrow.gov.uk/spd](http://www.harrow.gov.uk/spd)

Representations on the draft SPD may be sent to the following postal and e-mail addresses:

Local Plans Team  
Harrow Council  
Room 301, Civic Centre  
Station Road  
Harrow  
HA1 2XF  
[ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)

The draft SPD is also available to view via the Council's online consultation portal. Representations may also be made via the portal:

<http://harrow.limehouse.co.uk/portal/>

The closing date for representations is 5pm on 5<sup>th</sup> September 2013

If you have any queries please email [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) or contact the Local Plans Team on tel. 020 8736 6082.

**Matthew Paterson**  
**Head of Planning Policy**  
3<sup>rd</sup> July 2013



## Appendix 2 – Letter to Consultees



Giles Dolphin  
Greater London Authority,  
City Hall  
The Queen's Walk  
London  
SE1 2AA

Planning Services  
Harrow Council  
8 July 2013

Dear Sir / Madam,

### Harrow Local Plan – Planning Obligations Supplementary Planning Document (SPD) Public Consultation 11<sup>th</sup> July – 5<sup>th</sup> September 2013

I am writing to invite you to take part in the public consultation on Harrow's Draft Planning Obligations SPD.

The proposed SPD will supplement adopted Development Management Policy DM50 which states that Planning Obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing, and to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

The purpose of the draft SPD is to clarify the types of site specific obligations, such as affordable housing, that the Council might seek in addition to Harrow's forthcoming Community Infrastructure Levy (to commence 1<sup>st</sup> October 2013), depending on the nature of the development, the likely impacts to arise, and the need for obligations to mitigate these.

In addition to simply providing a list of potential obligations, a key objective of the SPD is to clarify the Council's procedures in respect of securing planning obligations. This is to aid in the effective functioning of the planning application process.

Upon adoption, the SPD will be a material consideration in the determination of planning applications and appeals for all development. This consultation therefore represents an important opportunity for you to tell us what you think about the draft Planning Obligations SPD and to suggest any changes for the final version.

The consultation will close at 5pm on 5<sup>th</sup> September 2013. Please note that any response received after the close of the consultation may not be taken into account.

You can take part in this consultation by:

- Leaving comments online at <http://harrow-consult.limehouse.co.uk/portal/planning>
- Email – [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk)

- Post - Harrow Council Local Plan Team, Planning Department, 3<sup>rd</sup> Floor Civic 1, Civic Centre, P.O. Box 21, Harrow, HA1 2UJ.

The Planning Obligations SPD is available to view:

- Online – [www.harrow.gov.uk/planning](http://www.harrow.gov.uk/planning)
- At all Borough Libraries
- By request at Harrow Civic Centre

The Planning Obligations SPD was subject to a 'screening opinion' as required by the Environmental Assessment of Plans and Programmes Regulations (2004). The screening opinion concludes that the SPD does not need to be subject to strategic environmental assessment, as it only constitutes further guidance to the adopted policy of the Development Management Policies Local Plan (2013).

After this public consultation, the Council will consider all representations received and make changes to the Planning Obligations SPD where appropriate. Subject to the approval of the Council's LDF Panel and Cabinet, it is intended that a final version of the SPD will be adopted in October 2013.

The Council keeps under continuous review its policies and practices to ensure that services are being delivered in the most cost effective manner. As part of this consultation, over 800 letters were sent out to contacts on our Local Plan database, for whom the Council has no e-mail address.

In the future we would like to send as many notifications as possible electronically for consultations on Local Plan matters. Therefore, if you have an email address and do not mind receiving notifications of consultation events via email, please can we request that you email us at [ldf@harrow.gov.uk](mailto:ldf@harrow.gov.uk) from your preferred email address with the subject 'Consultation Update', so that we can amend our database details for you.

Yours faithfully,

**Matthew Paterson**  
Head of Planning Policy  
Harrow Council