

CONSULTATION STATEMENT Draft Mobility & Wheelchair Housing SPD

This consultation statement is required in connection with the preparation of Harrow’s Mobility and Wheelchair Housing Supplementary Planning Document. It demonstrates whom and how the Council has engaged in the early stages of preparing the SPD and its accompanying Sustainability Appraisal.

The statement contains the following information:

- i) the names of the organisations whom the Council consulted in connection with the preparation of the SPD;
- ii) how those organisations were consulted;
- iii) a summary of the main issues raised in those consultations; and
- iv) how those issues have been addressed in the SPD.

Initial consultation on the draft Mobility and Wheelchair Housing SPD took place over a four-week period in September and October 2005.

The following organisations were sent a copy of and invited to comment on the draft SPD and Sustainability Appraisal (SA) Scoping Report:

Shopmobility	Family Housing Association
Harrow Association of Voluntary Services	Genesis Housing Group
Access Association	Haig Homes
Disabled Foundation	Hanover Housing Association
Harrow Crossroads	Harrow Churches Housing Association
Harrow Association of Disabled People	Home Group Limited
Harrow Carers Centre	Housing 21
Harrow Early Years and Childcare Services	Innisfree Housing Association
Harrow Leisure Centre	Inquilab Housing Association Limited
Harrow Mencap	John Grooms Housing Association
Mind in Harrow	Metropolitan Housing Trust Limited
MS Society	New Era Housing Association Limited
Community Link Up	Paradigm Housing Group
Greater London Action on Disability	Peabody Trust
British Council of Disabled People	Pinner House Society
Royal National Institute for the Blind	Sanctuary Housing Association
Royal National Institute for the Deaf	Shepherds Bush Housing Association Limited
People First	Stadium Housing Association Limited

Sport England	Stanmore Christian Housing Association Limited
Disability Awareness in Action	The Abbeyfield Harrow Society Limited
Disability Rights Commission	The Guinness Trust
National Centre for Independent Living	Warden Housing Association Limited
Government Office for London	Women's Pioneer Housing Limited
Greater London Authority	Barratt Homes North London
Environment Agency	Bellway Homes North London
English Nature	Berkeley Homes West London
Countryside Agency	Bovis Homes South East Region
English Heritage	Bryant Homes London
Highways Agency	Clearview Homes Ltd
London Borough of Hillingdon	Crest Partnership Homes Ltd
London Borough of Ealing	Fairclough Homes Northern Home Counties
London Borough of Hounslow	George Wimpey North London Ltd
London Borough of Brent	George Wimpey West London Ltd
London Borough of Hammersmith & Fulham	Goldcrest Homes plc
London Borough of Barnet	Home Builders Federation
Hertsmere Borough Council	Laing Homes North Thames
Three Rivers District Council	Martin Grant Homes (UK) Ltd
Hertfordshire County Council	McCarthy & Stone Developments Ltd
Elstree and Borehamwood Town Council	Rialto Homes Plc
Watford Rural Parish Council	St. James Homes Ltd
Commission for Architecture and the Built Environment	Joseph Rowntree Foundation
Anchor Trust	Dominion Housing Group
Apna Ghar Housing Association Limited	Ealing Family Housing Association Limited
ASRA Greater London Housing Association Limited	English Churches Housing Group
Bnai Brith JBG Housing Association Limited	

The draft SPD and SA Scoping Report were also placed on the Council's website (see notice below) and made available for inspection at Planning Reception.

Mobility and Wheelchair Housing Supplementary Planning Document (SPD) (September)

The Council is currently producing a Mobility and Wheelchair Housing SPD which will elaborate upon the existing accessible homes policy in the adopted Harrow Unitary Development Plan (UDP). An important stage in producing the SPD is securing early community and stakeholder engagement. You are invited to comment on the draft document and its supporting Sustainability Appraisal report. Comments should be received no later than 4.30pm on Friday 14th October 2005.

The draft Mobility and Wheelchair Housing [SPD](#) and its accompanying [Sustainability Appraisal Scoping Report](#) have now been published. Copies are available for inspection at Planning Reception, Garden House, 5 St. John's Road, Harrow, HA1 2EE. For more information please

contact Ali Kashmiri on 020 8736 6611 or Sukhpreet Khull on 020 8736 6086, or by e-mail ali.kashmiri@harrow.gov.uk.

In addition to the external consultation process, the draft SPD and SA Scoping Report were also circulated to relevant internal Council staff inviting comments relating to their particular areas of expertise.

Summary of the main issues raised:

Representati on Number	Individual/ Organisation	Summary of representation/issue	How the issues raised have been addressed in the SPD
STATUTORY CONSULTATION AUTHORITIES REPRESENTATIONS			
1	English Heritage	<p>SPD and SA report should contain a reference to PPG15 (Planning and the Historic Environment) and the special circumstances and constraints buildings of historic interest may present (para. 3.26-3.29). They enclosed a copy of their Easy Access to Historic Buildings, July 2004. They suggest that this document can be used to inform the SPD in terms of how to take account of areas of historic interest, in particular conservation areas, and how to develop a framework in which the requirements of each property and the needs of its users can be assessed and an access strategy agreed.</p> <p>They mention that the SPD does not make reference to the need for high-quality design that meets the needs of accessible homes yet reflects the special character of such areas.</p> <p>They advise that the Council's Conservation staff should be linked into the production of the SPD.</p>	Changes to be taken on board. We are working closely with our Conservation Team in the production of this SPD and have taken on board the comments suggested. PPG 15 has been referenced in both documents.
2	Countryside Agency (CA)	The CA commends the Council's SPD in elaborating upon the application of adopted	No issues to address

		<p>HUDP policies, Policy H18 and welcomes the aim to seek provision for inclusive communities within the Borough. They recognise the identified links made to the London Spatial Plan and relevant guidance and our intention to monitor and assess the objective against proposed targets and outputs.</p>	
EXTERNAL ORGANISATIONS & PEOPLE REPRESENTATIONS			
3	Highways Agency	No comments at this stage of the consultation	No issues to address
4	Bellway Homes	<ul style="list-style-type: none"> The clarity of the SPD in setting out well defined standards for both Lifetime and Wheelchair Standard Homes is supported. However they suggest that requirements are not broadly similar to Part M of the Building Regulations. They do not consider these requirements to be minor, such as the requirement to provide a w.c on the entrance level. They suggest that a lifetime home will take up more space and therefore have an impact on residential density. The SPD has been criticised its inconsistency with the HUDP policy H18. The SPD requires all housing developments to meet the minimum requirement of Lifetime Home Standards, whilst Policy H18 requires that a proportion of larger residential schemes are built as Lifetime Homes. 	<ul style="list-style-type: none"> The Lifetime Homes concept was developed by the Joseph Rowntree foundation. During the mid-nineties, the government carried out extensive research, which resulted in an extension to Part M in 1999 to include all new housing. Features such as an accessible threshold, entrance level WC, and internal doors with increased width are already a minimum requirement. The lifetime homes criteria merely builds on Part M. When space efficiency remains a primary consideration at the initial design stages, lifetime homes will not adversely affect housing density or cost. Therefore, as defined by the Joseph Rowntree foundation, lifetime homes criteria constitutes only 'minor' changes to the building regulations. The point has been taken on board and the wording will be corrected to be consistent with the HUDP policy H18.
5	Trish Pashley- Greater London Action on	No comments	No issues to address

	Disability (GLAD)		
6	Disability Rights Commission (DRC)	DRC welcomed the proactive approach taken by the Council in tackling the current and projected need for accessible housing, which supports the principles of sustainable design. They were encouraged by the commitment to improving the social inclusion of disabled people through accessible housing that is integrated across the whole borough. They were also pleased to see the promotion of access statements within the SPD. They stated that they did not have the capacity to give detailed responses to individual local policy consultations, but would like, in general terms, to commend the borough's work. They would like a copy of the final document so that they 'are able to cite this as an example of local good practise.'	No issues to address
IN-HOUSE REPRESENTATIONS			
7	Conservation Team	SPD applies mainly to new housing, which obviously has little direct impact on the historic environment. Advice is provided on adapting buildings in conservation areas. The comments made on historic buildings in the Access for All SPD largely apply to this SPD and it is suggested that this be adapted and included in this SPD. It is suggested that this would be most appropriately placed in the "Design Solutions and Recommendations" section of the report. The comments made to the accompanying SA report in assessing H18 are agreed with against the historic buildings objective.	Wording is being formulated to address the issues raised.

