



**ACCESS FOR ALL**  
**Supplementary Planning Document**

**SUSTAINABILITY**  
**APPRAISAL REPORT**

November 2005

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## How to Comment on the Report

Comments relating to this Sustainability Appraisal [SA] or the 'Access for All', Supplementary Planning Document [SPD] should be sent to:

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Alternatively, comments can be sent by fax on 020 8424 1551.

The Council can accept comments by e-mail relating to this consultation. Please contact Ali Kashmiri on 020 8426 0811 or [ali.kashmiri@harrow.gov.uk](mailto:ali.kashmiri@harrow.gov.uk)

Copies of both reports are also available via the planning pages on the Council's website at [www.harrow.gov.uk](http://www.harrow.gov.uk)

Comments from this informal consultation must be received by 4.30 pm on Friday 30<sup>th</sup> December 2005.

# **Sustainability Appraisal Background and Purpose**

## **1. Introduction**

### **1.1 The Main Principles of the Local Development Framework and Legislative Background**

The Local Development Scheme (LDS), brought into effect in June 2005, outlines the programme for preparing and reviewing Local Development Documents. The LDS includes the timetable for the production of this Access for All Supplementary Planning Document (SPD). SPDs provide additional guidance expanding upon policies in the Harrow Unitary Development Plan (HUDP).

## **2. Policy Context**

2.1 The 'Access for All' SPD is supplementary to the Harrow Unitary Development Plan [HUDP] and will form part of the Local Development Framework [LDF]. It has been produced in line with Harrow's vision as contained in the UDP under Section 2.17, to provide "A Borough that contains a range of local community, educational, social and health facilities which are more easily accessible by sustainable means" and to "provide good access to facilities and services for all". The SPD amplifies policies D4, C16 and C17. It will also contribute towards the implementation of policies SR2, SC1, EP47, D25, C7, and C9 (policies which can be referred to in Appendix 4).

2.2 Some of the most relevant documents reviewed for the production of the 'Access for All' SPD and this SA Report are listed below:

1. The Strategic Environmental Assessment Directive: Guidance for Planning Authorities. ODPM, London, October 2003
2. Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Consultation Paper, ODPM, September 2004
3. Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Interim Advise Note on Frequently Asked Questions, ODPM, London, April 2005
4. The Disability Discrimination Act (DDA) 1995
5. Planning and Access for Disabled People: A Good Practice Guide from the Office of the Deputy Prime Minister
6. Part M to the Building Regulations: May 2004
7. British Standard 8300; 2001- Code of Practice
8. The London Plan (Spatial Development Strategy for Greater London), Mayor of London, February 2004.

## **3. Strategic Environmental Assessment (SEA) & Sustainability Appraisal (SA)**

3.1 All DPDs and SPDs will need to undergo Sustainability Appraisal (SA) as required under section 5 of the Planning and Compulsory Purchase Act 2004. SA is a systematic process carried out during plan production; its purpose is to assess the extent to which emerging policies, proposals and supplementary information will help to achieve relevant environmental, social and economic objectives, i.e. sustainable development.

3.2 The European Directive 2001/42/EC requires an 'environmental assessment report' of plans and programmes prepared by public authorities that are likely to have a significant effect upon the environment. This process is referred to commonly as 'strategic environmental assessment' (SEA).

3.3 An Environmental assessment report has to be included as part of this SA report (Appendix 3), under the Strategic Environmental Directive (2001/42 EC), and this has been achieved by combining the two document requirements, in accordance with Annexe 7 of the ODPM guidance as the SEA guidance requirements have been incorporated into the Draft SA guidance<sup>1</sup>. This SA Report therefore uses an approach that addresses the requirements of SEA and SA simultaneously, by giving full consideration to environmental issues in compliance with SEA, whilst also addressing the spectrum of socio-economic concerns as required by SA.

#### **4. Reason for the Production of the Access for All SPD and Plan Options**

4.1 Following the introduction of the Planning and Compulsory Purchase Act 2004 and the publication of a variety of detailed access documents, a new and more comprehensive SPD was required. This will replace the outdated Supplementary Planning Guidance, which was formally adopted by the Council in 1994. Given the speedy change in guidance and new planning process and practice, there was little dissent within the Planning policy team for the need to replace the dated 1994 SPG and the need to complete the preparation of the new SPD. This SPD will be produced under the provisions of the Planning and Compulsory Purchase Act 2004, and regulations.

4.2 Work on the "Access for All" SPD started prior to the new planning system coming into force and it was originally intended to be adopted as an SPG. The former draft SPG is now being developed to become an SPD to give it more weight under the new planning system. This will ensure that the Access for All SPD can be implemented beyond the three year period, in which any HUDP policies and SPGs can be saved.

4.3 Both the Access for All SPD and this SA are working documents as a consequence of the transitional arrangements of the SPD changing from its original SPG format. Due to the fact that the Access for All SPD expands on existing saved policies of the HUDP and does not introduce new options or policies, the guidance has been brought out as a draft SPD as opposed to new policy which would have required the document to be produced as a DPD. It was considered a sensible option to progress the document as a SPD since its production had already commenced prior to the LDF system coming into force.

#### **5. The Purposes the Access for All SPD will serve**

5.1 A key objective of the Access for All SPD is to demonstrate the links between the Council's planning process, government planning policy and guidance and service provider obligations under the Disability Discrimination Act 1995. Access for All SPD aims to broaden the scope of good design by positively encouraging partnership working between the Council, professionals involved in the development process and the diverse range of local businesses and industry, in order to create local environments that are logical in layout, safe and easy to navigate. The Access for All SPD supports the fundamental principles of sustainable design. The guidance and requirements throughout the Access for All SPD actively promote the concept of inclusivity, to ensure access considerations form part of a development's overall design and not merely as bolt-on accessories.

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<sup>1</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Consultation Paper, ODPM, September 2004

5.2 Access for All presents requirements for design solutions that are far reaching and which complement current legislation in relation to the advice most frequently sought from the Council. The Access for All SPD will serve as a definitive guide. However, it is not intended that the 'Access for All' SPD will deliver comprehensive solutions for every type of building or service. Instead, its aim is to provide insight into a range of access issues, furnish its readers with transferable understanding of inclusive design principles and delivery of equitable services, whilst demonstrating that a good environment for disabled people is a great place for everyone. It is anticipated that the presentation of various scenarios within the Access for All SPD, in the context of everyday community life, will in turn perpetuate improved understanding and acceptance of people's differing needs.

5.3 It is intended that Access for All will counteract the negative attitudes commonly held against disability and will demonstrate to local people the Council's firm commitment to providing access for everyone who lives, works, and participates in Harrow life. The success of this SPD is dependent on developers, partners and service providers to implement its principles. Jacqueline Lockyer, a National Register of Access Consultants (NRAC) accredited consultant was commissioned by Harrow Council to assess the Access for All SPD in terms of its accessibility and the correctness of the technical guidance provided to ensure the Access for All SPD is user friendly.

#### **5.4 An Overall Summary of the Access for All SPD**

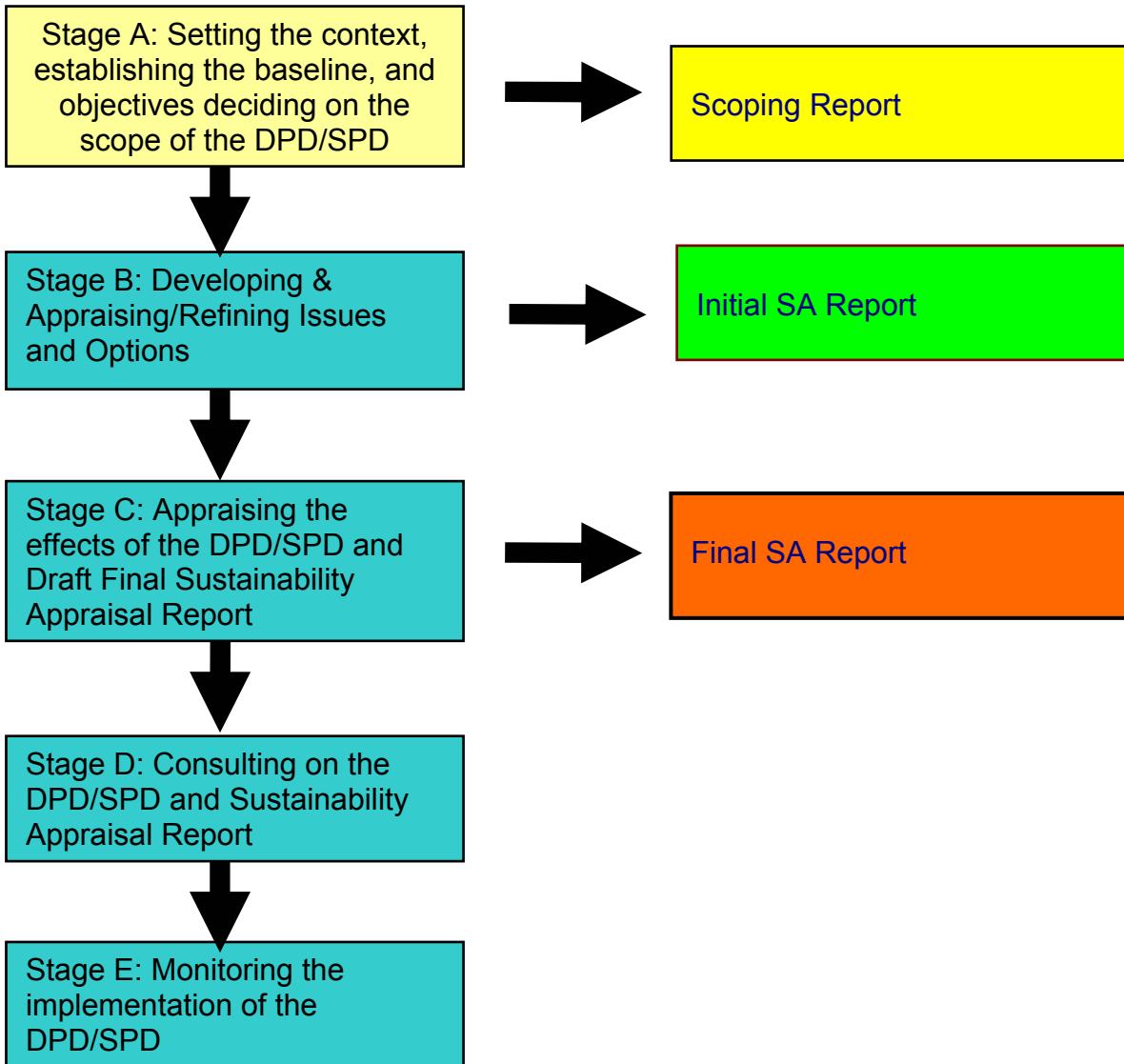
Acting mainly as a sign-posting, non-technical reference, the 'Access for All' SPD will:-

- serve primarily as planning guidance. However it will be relevant to all Council service areas that have responsibility for shaping and improving the built environment.
- seek to better integrate access considerations into the development process by firmly rooting the broad principles of inclusive design into the heart of Harrow's planning system.
- provide definitive advice in relation to planning applications, frequently asked questions and in situations where requests for straightforward technical advice is sought.
- adopt standards inline with statutory requirements and legislation, introduce best practice standards and promote inclusive design.
- illustrate examples and provide guidance on how access can be incorporated into the intrinsic design of older buildings of special architectural or historic interest, whilst applying due sensitivity.
- ensure that within time, all buildings, facilities, services and information will be accessible to all local people.
- discourage design solutions that have a negative impact on the local environment.

### **6. Sustainability Appraisal Methodology**

6.1 The approach adopted to undertake the SA was based on the process set out in the Draft Government Guidance on SA of Regional Spatial Strategies and Local Development Frameworks (September 2004). Figure 1 below demonstrates the stage by stage flow of the SA process and Figure 2 outlines the requirements and tasks to be undertaken within each stage of the SA process.

**FIGURE 1: Flow Diagram to Describe the SA Process Stage by Stage:**



6.2 At each stage of DPD or SPD production, a sustainability appraisal will be carried out to inform the consultation process, assist in refining policies and proposals and support submitted DPDs during the examination stage. There are five stages within the SA process and currently this SA report has addressed the tasks of stage A to stage C. The options appraisal requirements of stage B have been clarified in paragraph 4.3. The SA process has developed alongside the progression of the SPD. It should be recognised that informal consideration of sustainable development requirements have been given throughout the formulation of this SA, as have all aims included in the Access for All SPD. Figure 2 below also demonstrates the tasks involved in the SA process and how these link with the production of DPDs and SPDs.

6.3 The Council is producing an Overarching SA Report of the LDF, which is nearing completion. It identifies appropriate overarching high-level objectives for appraising policies against, and examines 'baseline' conditions in the Borough as required by stage A of the SA process. These overarching objectives have been used in this SA report assessment of the Access for All SPD (refer to page 12-15). This Overarching SA report is referred to as the SA Scoping Report in accordance with the ODPM draft SA guidance (September 2004) and has been designed to provide a foundation for the range of DPDs and SPDs that the Council intends to produce, but will if necessary be updated during the early stages of DPD or SPD production to ensure that the information and analysis it contains remain relevant. It will also be updated should any significant changes occur to the final ODPM SA guidance which was due to be published in October 2005.



**FIGURE 2: Sustainability Appraisal Process**

Generic SA Stages for Plan making	SA process linkages to the preparation of DPDs and SPDs	Stages and Tasks
<p><b>Stage A: Gathering information to produce an SA Scoping Report</b></p>	<p>Prepared alongside the preparation of the evidence base for the relevant DPDs and SPDs.</p>	<p>A1- Identifying other relevant plans, programmes &amp; sustainability objectives relevant to the LDF objectives to document how the plan is affected by outside factors and suggest ideas for how any constraints can be addressed.</p> <p>A2- Collecting relevant economic, social and environmental baseline information to provide an evidence base for sustainability issues, effects prediction and monitoring.</p> <p>A3- Identifying sustainability Issues to help focus the SA and streamline the subsequent stages, including baseline information analysis, setting of the SA Framework, prediction of effects and monitoring.</p> <p>A4- Developing the SA Framework to provide a means by which the sustainability of the plan can be appraised.</p> <p>A5- Testing the DPD/SPD objectives against the SA Framework - to ensure that the overall objectives of the plan are in accordance with sustainability principles and provide a suitable framework for developing options.</p> <p>A6- Consulting on the scope of the SA- The ‘authorities’ identified by the UK Government in the SEA Directive as being likely to be concerned by the environmental effects of implementing DPDs/SPDs have to be consulted to ensure the SA covers the sustainability issues.</p> <p>The four consultation authorities with environmental responsibilities as set out in Regulation 9 as part of the SEA determination process are:</p> <ol style="list-style-type: none"> <li>1. The Environment Agency;</li> <li>2. The Countryside Agency;</li> <li>3. English Nature; and</li> <li>4. English Heritage.</li> </ol>
<p><b>Stage B: Identify issues and options and prepare for consultation</b></p>	<p>Prepared outside the preparation of issues and options.</p>	<p>B1- Appraising issues and Options- To assist in the development and refinement of the options, by identifying potential sustainability effects of options for achieving the DPD/SPD objectives.</p> <p>B2- Consulting on the SA of emerging options of the DPD/SPD- To consult with the public and statutory bodies on the SA of emerging options to ensure the SA covers all the reasonable options and key sustainability issues.</p>



<p><b>Stage C-Appraising the effects of the draft DPD/SPD and SA report</b></p>	<p>Prepared alongside the preparation of the preferred options. Consultation on both DPD/SPD and SA report will take place at the same time.</p>	<p><b>C1-</b> Predicting the effects of the plan, including plan options- to predict the significant effects of the DPD/SPD and the DPD/SPD options.  <b>C2-</b> Assessing the effects of the DPD/SPD- to assess the significance of the predicted effects of the DPD/SPD and its options and assist in the refinement of the DPD/SPD.  <b>C3-</b> Propose measures to maximize beneficial effects and mitigate adverse effects.  <b>C4-</b> Developing proposals for monitoring- To detail the means by which the sustainability performance of the plan can be assessed.  <b>C5-</b> Preparing the SA Report- to provide a detailed account of the SA process, including the findings of the appraisal and how it influenced the development of the DPD/SPD, in a format suitable for public consultation and decision-makers.</p>
<p><b>Stage D- Consultation on the DPD/SPD and Sustainability Appraisal Report</b></p>	<p>Prepared alongside the preparation of the submission of DPD/SPD. Consultation on both will take place at the same time.</p>	<p><b>D1-</b> Consulting on the SA Report alongside the DPD/SPD- To provide the public and statutory bodies with an effective opportunity to express their opinions on the SA Report and to use it as a reference point in commenting on the plan.  <b>D2 -</b> appraising significant changes- To ensure that any significant changes to the plan are assessed for their sustainability implications and influence the revision of the DPD/SPD.  <b>D3 -</b> Decision making and providing information- to provide information on how the SA Report and consultees' opinions were taken into account in preparing the DPD/SPD. Submit DPD/SPD and SA Report to the Secretary of State.</p>
<p><b>Stage E- Monitoring the Implementation of the DPD/SPD</b></p>	<p>The sustainability of the Core Strategy DPD / SPD Policies will be assessed as part of the Annual Monitoring Report.</p>	<p><b>E1-</b> Monitoring the significant effects of the plan- To measure the sustainability performance of the plan in order to determine whether its effects are as anticipated, and thereby inform future revisions.  <b>E2 -</b> Responding to adverse effects- to ensure that the adverse effects can be identified and appropriate responses/actions developed.</p>

## 6.4 The SA Process stages followed in assessing the Access for All SPD

This Access for All SA report has addressed stages A-C of the SA process as outlined in Figure 2 above. This SA report accompanying the Access for All SPD was referred to the four consultation authorities with environmental responsibilities as stated in stage A6 of the SA process. See Figure 2 above. The responses to the consultation were positive and have been summarised in the Access for All Consultation Statement. The current consultation (November-December 2005) addresses Stage D1 of the SA process.

## 6.5 Analysis of Relevant Plans and Baseline Collection

Baseline data relating to local social, economic and environmental issues was collected as a way of devising a structure for the Access for All SPD and to determine its content or scope in

line with relevant government guidance, plans and programmes that were reviewed. The most important task in carrying out a SA of this Access for All SPD was to establish the likely significant effect of content of the Access for All SPD against social, economic and environmental factors, in accordance with the requirements of the SEA Directive and the Planning and Compulsory Purchase Act 2004.

6.6 A review of European, national, regional and local policy and strategy plans was undertaken to identify appropriate social, environmental and economic objectives for the Access for All SPD. The documents reviewed are detailed in the Access for All Bibliography and in paragraph 2.2 of this report. These sustainability objectives have been interpreted as per the headings in the Access for All SPD and hence reflect the overall content and actions proposed in the SPD.

**The objectives of the Access For All SPD are to:**

1. ensure inclusively designed buildings and environments result from development
2. promote healthy living through provision of accessible health and fitness facilities
3. provide a range of recreational and leisure facilities that are accessible to everyone
4. promote social inclusion of disabled people
5. ensure that inadequate access provisions in existing buildings are remedied
6. broaden the scope of good design through partnership working between the Council, local businesses, industry, and professionals involved in the development process
7. streamline procedures for incorporating access considerations into the development process
8. raise the profile of local need and ensure inclusive local services
9. widen educational and skill-learning opportunities
10. promote accessible design that is consistent and beyond minimum standards
11. provide a link between the Council's planning process and service provider's DDA obligations
12. improve the quality of life for local people and reduce the strain on public health services
13. encourage local spending by improving accessibility
14. improve access to historic venues and the services and facilities contained within them.

6.7 These Access for All SPD sustainability objectives have been assessed against environmental factors as required by Annex 1 Article 5(1) of the SEA Directive, to identify the likely significant effects of the Access for All SPD on these environmental factors. The environmental factors detailed in the SEA Directive Annex 1 Article 5(1) are as follows: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (See Appendix 3).

6.8 Appendix 3 details the sustainability objectives formulated based on the context of the Access for All SPD and the sustainability dimensions these objectives address i.e. social,

economic and/or environmental. It also demonstrates the proposed actions of the Access for All SPD and the likely impact of these actions on the environmental factors listed above in implementing the Access for All SPD, and whether they are likely to be short, medium or long-term effects. A few indicators have also been devised to monitor the implementation of the Access for All SPD objectives.

6.9 Social and Economic factors have also been considered through assessments of accessibility with regards to Harrow population statistics, health, access to a variety of public facilities in the Borough such as banks, shops, stations, colleges etc. See Appendix 2.

6.10 These Access for All SPD objectives have also been assessed against the overarching SA objectives contained in the Overarching SA Scoping Report of the LDF that the Council is nearing completion (as mentioned earlier in paragraph 6.3, also see below, figure 3). This is to ensure that the Access for All SPD objectives are consistent with the overall objectives of the Council's vision proposed for the LDF, and also to test that the SPD objectives meet economic, environmental and social factors.

**FIGURE 3: The overarching SEA/SA Objectives contained in the Overarching SA Scoping Report of the LDF**

SEA/SA Objective No.	Overarching SEA/SA Objective	Econ	Soc	Env
1	To make the most efficient use of land by developing on redundant and vacant brown field sites and buildings, and to ensure that land is remediated as appropriate			✓
2	To protect the quality, quantity and accessibility of open spaces in the Borough			✓
3	To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough			✓
4	To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features.	✓	✓	✓
5	Reduce road congestion and traffic pollution levels by improving travel choice, reducing the need for travel by car, and shortening the length and duration of journeys	✓	✓	✓
6	To reduce air pollution and ensure air quality continues to improve through addressing the cause of climate change through reducing emissions of greenhouse gases		✓	✓
7	To reduce pollution of land (soil) and water			✓
8	To promote development proposals and/ or policies which consider the implementation of renewable/sustainable energy technologies, which exploit the use of wind, solar and biomass energy	✓		✓
9	Incorporate waste strategies into new developments and promote further the waste hierarchy of minimisation, reuse, recycling and composting			✓
10	To facilitate the development of a dynamic and diverse economic sector which attracts growth, enables partnership working and training and skills development opportunities	✓	✓	
11	To ensure all groups have access to decent, appropriate and affordable housing that meets the needs of Harrow's residents.	✓	✓	✓
12	To reduce social exclusion by improving accessibility to jobs, health, education, shops, leisure, cultural and community facilities to everyone	✓	✓	
13	To improve the health and wellbeing of Harrow residents and reduce inequalities in health	✓	✓	✓
14	To improve the competitiveness, vitality, viability and adaptability of Harrow town centre	✓	✓	
15	To reduce crime and the fear of crime	✓	✓	✓

**FIGURE 4: Compatibility Matrix comparing the Access for All SPD objectives against the Overarching SEA/SA Objectives of the LDF**

		OVERARCHING SEA/SA OBJECTIVES OF THE LDF (No.s)															
S P D  O B J E C T I V E S		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	
	1											+	+	+	+		
	2													+	+		
	3		+											+	+		
	4											+	+	+			
	5					-						+	+				
	6					+						+	+				
	7													+			
	8											+	+	+			
	9													+			
	10											+	+	+			
	11											+	+				
	12		+									+	+	+			
	13													+		+	
	14		+/-	+/-	+/-									+			

+	<b>Objectives are compatible</b>
	<b>Objectives have no link</b>
?	<b>Uncertain link</b>
+/-	<b>Potentially compatible and incompatible</b>
-	<b>Objectives are incompatible</b>

Uncertain compatibility and some incompatibilities between the overarching LDF objectives and the access for all objectives have been identified in the matrix above (figure 4). It is considered that the incompatibilities identified do not necessitate the Access for all SPD objectives to be re-written since the actual likely impact or effect of the objectives on one another is dependent on the way in which they are implemented. There are some areas of potential conflict which will always remain, for example, certain listed buildings which may require changes to be accessible to all and afford equal opportunities to all, may not be adaptable to accommodate access arrangements as this could compromise the architectural and historic value of the building. It should be noted, however that where adaptations are permissible, potential likely negative impacts can be avoided through the implementation of the Access for All SPD and the saved HUDP policies.

**FIGURE 5: Highlights the areas of uncertainty and incompatibility between the implementation of objectives as identified in the matrix above (Figure 4)**

<b>SPD objective</b>	<b>Compatibility uncertainty with overarching SA objective</b>	<b>Implementation considerations</b>
14) improve access to historic and contained services and facilities	2) To protect the quality, quantity and accessibility of open spaces in the Borough 3) To conserve and enhance the ecosystems/habitats, species and species diversity in the Borough 4) To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features.	Improving access to areas of historical, biodiversity, archaeological or open space value can lead to increasing their value to the community and thus help to ensure their protection. However increasing use and traffic can have adverse affects on some sensitive sites.
5) ensure that inadequate access provisions in existing buildings are remedied	4) To restrict development which can negatively affect the landscape and streetscape and design of historic, archaeological sites (listed buildings and conservation areas) or culturally important features.	There may be some instance where providing for access provisions could compromise the existing historical and architectural values and streetscape.

## 7. HUDP Policies Appraisal

It is a requirement that when appraising an SPD, the unitary development plan policies being supplemented should themselves be appraised if this has not previously taken place.<sup>2</sup> As mentioned in paragraph 2.1, Access for All SPD supplements policies: D4, C16 and C17 of the HUDP. It will also contribute towards the implementation of policies SR2 SC1, EP47, D25, C7, and C9. The table below, figure 6, demonstrates the appraisal of policies D4, C16 and C17. The appraisal of policy D4 covers all the other policies as the policy applies to 'all development proposals'. These policies have been appraised against the overarching SEA/SA objectives of the LDF. All the policies can be seen in full in Appendix 4.

**FIGURE 6: Relevant HUDP policies appraisal chart**

Key:

++	Strong impact
+	Moderate impact
-	Negative impact
	No impact

Relevant HUDP saved policies	Short, medium and long term impacts	Overarching SA objectives by Number														
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
D4 C16 C17	Short	++	+ ++ ++		+ - -	+ +				+ +	+ -	+ + +	++ ++			
	Medium	++	+ ++ ++		+ - -	+ +			+ +	+ +	+ + +	+ + +	++ ++ +	+ +	+ +	
	Long	++	+ ++ ++		+ - -	+ +			+ +	+ +	+ + +	+ + +	++ ++ +	+ +	+ +	

<sup>2</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Interim Advice Note on Frequently Asked Questions, ODPM, London, April 2005



### **Assessment of Policies:**

The policies make a positive contribution to sustainability in terms of socially seeking to achieve accessibility for disabled people, including wheelchair users and elderly people through encouraging community services and facilities to meet the needs of all who live, work or visit the Borough. The policies make a positive contribution to environmental aspects, since facilitating the improvement of accessibility to open spaces can raise the value of such spaces and create a sense of belonging amongst locals, which can further help to protect and enhance what is available to see and access.

Policies C16 and C17 in relation to SA objective 4 have been shown in the table to be potentially negative in their impact. There may be some instance where providing for access provisions could compromise the existing historical and architectural values and streetscape.

Policies C16 and C17 in relation to SA objective 10 also demonstrate potential negative impacts in the table, as there may be initial upfront costs to developers adapting or converting existing buildings and services to make them accessible to all users, which theoretically could in turn affect the economic sector. However these changes would enable equality of opportunity to training and skills development, jobs and partnership working. This initial cost would be a short-term negative impact in making adaptations to existing buildings, however this would be a positive medium and long-term impact or solution.

The policies have an indirect positive effect on the economy by enabling disabled people improved access to shops and service, and also in enabling disabled people access to places of employment.

## **8. Baseline Reasoning and Data**

The population of the UK is predicted to grow by 7% over the next 30 years, however, the number of disabled people in the UK is expected to rise by 40% according to the Office for National Statistics.

8.1 The latest population projections produced by the Greater London Authority (GLA) (2005 Interim Projections Scenario 8.8) show that by year 2020 it is estimated that half of Harrow's adult population will be aged over 50, with people over 75 being the most rapidly growing sector. With an ever-increasing aging population and the associated likelihood of higher numbers of people with restricted mobility, there is urgent need for design methods based on better understanding of age and disability related factors. The Council must therefore adopt guidance that sets clear parameters for the design of developments, as decisions taken now will affect Harrow in the decades beyond 2020.

**FIGURE 7: Population of Harrow with Limited Long Term Illness (LLTI) or Disability**

<b>Age Range</b>	<b>Population of Harrow</b>	<b>People with LLTI or Disability</b>	<b>People likely to benefit from Inclusive Design</b>
0-15 years of age	41655	1518	3.64 %
Females 16-59 Males 16-64	129599	13119	10.12 %
Females 60+ Males 65+	33843	14887	43.99 %
75+	<i>*13750</i>	<i>*7832</i>	<i>*56.96 %</i>
All people	205097	29524	14.40 %

(\*figures in italics do not contribute to the total).

8.2 Whilst nearly 31,000 people currently have a long-term illness or disability research reveals that 61.4% of retail units in Harrow are inaccessible to wheelchair users (Appendix 2).

8.3 All new buildings in Harrow are required to comply with Part M to the Building Regulations 2000 (2004 edition) and are therefore accessible to disabled people. However, from research carried out, a high proportion of existing buildings remain inaccessible to disabled people, particularly wheelchair users.

#### **8.4 Planning Application Consultations & Enquiries Received**

In addition to reflecting statutory requirements, the guidance contained in 'Access for All' SPD is based on access observations provided as part of the formal planning application process between September 2001 and August 2003. The data collected between September 2001 and August 2003 (from access observations provided in relation to planning applications, enquiries from local people, and site visits relating to concerns or complaints handled) was used during production of the Access for All SPD.

8.5 Appendix 1 details **planning applications** on which observations were made from an accessibility point of view. A range of sustainability issues have emerged from these. Based on the tabulated information it became evident that there was a need for clear guidance on accessibility and access in new development schemes. It is essential that these considerations are addressed at the initial stage of development to ensure compliance with the Disability Discrimination Act 1995 (DDA) and current best practice regulations, and to ensure that issues of sustainable development are addressed. These sustainability issues and or the issues least addressed by planning applicants have clearly influenced the content of the Access for All SPD.

8.6 It is the case that a significant proportion of existing buildings in Harrow (where services to the public are delivered) remain inaccessible to local people. Many of these

buildings will require ramps or an alternative intervention to facilitate access, in order that service providers can fulfil their obligations under the DDA. Statistical information is detailed in Appendix 2. The tables demonstrate inaccessibility levels to local retail units in the main designated retail areas in Harrow.

8.7 Research carried out suggests **smaller retailers** are gaining little benefit from the spending power of disabled people. This suggests that disabled people are required to travel distances to larger more accessible retail outlets, shop out of borough, or perhaps be reliant upon assistance from others. A survey of 2043 shop frontages in Harrow's primary shopping centres was carried out to measure the impact that Planning Policy Guidance 6 (PPG6) and Planning Policy Statement 6 (PPS6) had had on improving the accessibility of such areas and particularly on the shop units themselves. The study confirmed that 61.4% of retail units in the Borough have stepped entrances and are therefore inaccessible to wheelchair users. See Appendix 2 for survey details.

8.8 A number of **privately owned car parks** within the Borough were assessed against the best practice guidance of British Standard 8300; 2001- Code of Practice (BS 8300). Although in the majority of cases the dimensions of the car parking bays exceeded best practice guidelines, the side transfer bay had either been omitted or incorrectly designed. Guidance should be provided to ensure that new car parking bays are designed in accordance with BS 8300. See Appendix 2.

8.9 From a randomly selected list, 10 locally **listed buildings** were visited to ascertain the amount of accessibility for the public. The London Borough of Harrow has over 1300 entries on locally and statutorily listed buildings. Selections of buildings in different wards were picked for our observation. The findings are presented in Appendix 2. Of the 10 buildings of special architectural interest, only 2 catered for the needs of wheelchair users. See Appendices 1 and 2.

8.10 Harrow Council has an on-going programme of improvement work for **schools** in the Borough and therefore an assessment of these areas was not completed. However, Harrow's 3 establishments of further education were assessed for accessibility purposes and a number of deficiencies were identified as detailed in Appendix 2.

8.11 Eight **randomly selected bars and restaurants** across the Borough were assessed for access to the premises and facilities. As expected the more established chains provided better access facilities, however there is a need for clear guidance to make all premises and facilities accessible. Premises requiring customer toilet facilities under Licensing or Environmental Health regulations should incorporate at least one facility that is accessible to all customers. Guidance will be provided within the Access for All SPD to this effect as it develops. Although each individual facilities situation will be assessed on its own merits, the feasibility study carried out as part of this work indicates that premises with a floor area greater than 65m<sup>2</sup> can accommodate an accessible provision designed in accordance with BS 8300, 'unisex accessible corner WC' layout, without causing undue detriment to the business. It is therefore intended that the Access for All SPD will undergo refinement to require premises with a floor area greater than 65m<sup>2</sup> to have at least one accessible WC facility.

8.12 A study was conducted of guest accommodation in 13 **hotels** to assess compliance with BS 8300. Only 4 out of the 10 hotels visited were accessible and had facilities for wheelchair users. A number of establishments claimed to have access and facilities, however upon inspection these were found to be lacking.

## **9. Next Steps**

The next stages in the SA process will be completed alongside the development of the Access for All SPD and responses received to this SA Scoping Report will be taken into consideration. The indicators which have been devised to monitor the implementation of the Access for All SPD objectives (Appendix 3) will be monitored and further developed on the basis of the comments received in this consultation on the scope of the Access for All SPD sustainability objectives.

## APPENDIX 1:

### Summary of Access Comments Provided on Non-domestic Planning Applications (Sept 01 to Aug 2003)

		Related Requirement or Informative																			
		DDA Obligations	Parking	Street Furniture & Open Spaces	External Access to Buildings	Ramps	External Steps	Entrances to Buildings	Horizontal Circulation	Vertical Circulation	Signage	Accessible Toilet Provision	Access for Staff	Entertainment & Hospitality	Reception & Service Counters	Means of Escape	Customer Care (inc. Lighting)	Changing Facilities	Customer Seating	Payment Facilities	Access to Unique Facility
Type Of Application	Quantity																				
Tables & Chairs on Highway	3	✓		✓		✓		✓									✓		✓		
A1 - A3	21	✓	✓		✓	✓		✓	✓		✓	✓			✓	✓	✓		✓	✓	✓
New Shopfronts	25	✓						✓								✓	✓		✓	✓	
Take Away/ Restaurant	6	✓				✓		✓								✓	✓		✓	✓	
Places of Worship	5	✓	✓		✓	✓		✓	✓	✓	✓	✓	✓		✓	✓	✓		✓		✓
Teaching Accommodation	8	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓	✓		✓	✓	
Medical, Dental, Social Care	10	✓	✓		✓	✓			✓	✓		✓			✓	✓	✓	✓	✓		✓
A2-A3	4	✓						✓	✓		✓		✓		✓	✓	✓			✓	
Automatic Teller Machines	5	✓		✓													✓				
Office Accommodation	5	✓									✓						✓				
Leisure & Entertainment Facilities	9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

**APPENDIX 2: Table Showing the level of Accessibility/inaccessibility to retail units in Harrow by wheelchair users**

Establishment	Area or Ward	Accessible	Inaccessible	Assessment Analysis	Implications for the Access for All SPD objectives
<b>2,043 Shop Frontages Assessed for Level or Suitably Ramped Access (in main designated retail areas)</b>					
	Sudbury Hill	10	23	Results from surveying 2,043 shop units across the borough, indicate that 61.4% of retail outlets are inaccessible to wheelchair users.	Ensure requirements to improve access for wheelchair users into retail outlets and particularly into small shop units.
	Kenton	38	56		
	Queensbury	24	33		
	Edgware	31	57		
	Burnt Oak	24	35		
	Stanmore	37	51		
	Belmont	26	84		
	Harrow Weald	17	68		
	Wealdstone	60	172		
	Harrow Town Centre	215	377		
	Hatch End	46	31		
	Pinner	74	97		
	North Harrow	46	53		
	Rayners Lane	51	25		

APPENDIX 2: Table to show the accessibility to various types of randomly surveyed public facilities in Harrow  Establishment	Ward	Accessible	Assessment Analysis	Action for SPD
<b>10 Listed Buildings assessed for access and facilities</b>				
Rat & Parrot	Greenhill	✓	Has low levels for disabled access and seating is provided outside. Toilets are provided for disabled customers	No action
Nat West Bank	Greenhill	✓	Undergoing construction to provide ramp access.	Demonstrate adaptation need not harm significant features of a building of special architectural or historic interest.
St John's Church	Greenhill		Has no access and would not be suitable for wheelchair users. Use of a temporary ramp seems to be in existence	Provide guidance to encourage access improvements that allow disabled people to partake in religious services and practices.
Gold's Gym	Greenhill		Has no facilities for wheelchair users, the doors are not user friendly, and there is no doorbell to ring for assistance.	Provide guidance on achieving inclusive fitness facilities, together with positive images.
Wealdstone Baptist Church	Harrow Wealdstone		No facilities exist for disabled people. The church is set over a metre from ground level with steps leading into the church. Particularly inaccessible to wheelchair users.	Provide guidance to encourage access improvements that allow disabled people to partake in religious services and practices.
Wealdstone Methodist Church	Harrow Wealdstone		No adequate parking space or access ramp into the church.	
Stanmore Station	Stanmore		No wheelchair access. Steps are the only means of reaching the station; no lifts exist.	No action for the SPD. The Council has no direct control.



<b>APPENDIX 2: Table to show the accessibility to various types of randomly surveyed public facilities in Harrow</b>				
<b>Establishment</b>	<b>Ward</b>	<b>Accessible</b>	<b>Assessment Analysis</b>	<b>Action for SPD</b>
Bernay's Memorial Institution	Stanmore	✓	Has ramped access (specification not checked). Car parking is restricted.	No action
Headstone Station	Harrow-on-the Hill		Inaccessible to wheelchair users as there is no lift access.	No action for the SPD. The Council has no direct control.
Etonian Hotel	Harrow-on-the Hill		Does not have amenities for disabled guests.	Provide guidance on overnight accommodation.
<b>3 Education facilities assessed for access</b>				
Stanmore College	Stanmore	✓	Has 4 designated accessible car parking spaces.	Provide physical access guidance relevant to educational establishments. Provide insight into the social and economic value of providing equal access to all facilities.
Harrow College	Stanmore	✓	Designated accessible car parking spaces within close range of the reception area.	
St Dominic's College	Harrow-on-the-Hill		No accessible parking. Level flooring throughout which facilitates the movement of wheelchair users. There are 3 accessible toilets within the college, with one on the basement level; accessed via a ramp. Measurements identified that it is below standard.	
<b>11 Service providers with privately owned car parks assessed for compliance BS 8300<sup>3</sup></b>				
Netto	South Harrow		There are 4 accessible parking bays; all four are within easy reach of the store. Bays are not in accordance with BS 8300.	Provide detailed guidance on the design and location of accessible parking bays to ensure that best practice
Harrow College	Stanmore	✓	Designated accessible car parking bays are sited within close range of the reception area.	

<sup>3</sup> Access for All SPD contains guidance on relevant requirements

APPENDIX 2: Table to show the accessibility to various types of randomly surveyed public facilities in Harrow  Establishment	Ward	Accessible	Assessment Analysis	Action for SPD
Tesco	Greenhill	✓	Has 20 designated accessible parking spaces within 50 metres of the store. The parking bays are not in line with the criteria BS 8300 as the shared transfer area is only 890mm.	standards are promoted and that borough-wide consistency is achieved.
Sainsbury	Stanmore	✓	13 accessible car parking bays within 10m of the shop, at 4830mm x 2300mm with a side of transfer area (where provided) of 1300mm.	
Lidl	Stanmore	✓	Has 4 accessible car parking bays with dimensions exceeding the criteria of BS 8300.	Provide detailed guidance on the design and location of accessible parking bays to ensure that best practice standards are promoted and that borough-wide consistency is achieved.
Stanmore Sixth Form	Stanmore	✓	Has 4 designated accessible car parking bays.	
Cumberland Hotel	Greenhill		No designated accessible parking.	
Waitrose	Harrow Wealdstone	✓	Accessible parking bays fall outside BS 8300 design guidance. Parking spaces are within 50m of the shop entrance.	
South Harrow Complex	South Harrow	✓	Has 17 accessible parking spaces, all of which are compliant with the guidance of BS 8300.	
McDonalds restaurant	South Harrow		Accessible car parking bays fall short of BS 8300 design guidance.	
Bar limited: banqueting suite	South Harrow		No designated accessible parking.	

APPENDIX 2: Table to show the accessibility to various types of randomly surveyed public facilities in Harrow  Establishment	Ward	Accessible	Assessment Analysis	Action for SPD
<b>8 Bars and Restaurants accessed for access and facilities</b>				
Nando's	Greenhill	✓	Good access via internal ramp. There is also an accessible toilet facility, which doubles-up as a baby changing room. At 2190mm by 1420mm, the cubicle dimensions fall below current best practice standards. Has internal floor area of 139m <sup>2</sup>	Provide guidance on creating good access to bars and restaurants, including delivery of accessible services in context to catering and hospitality. Include requirements for ensuring that outdoor tables and chairs do not hinder the movement of disabled people, nor compromise the safety of blind or partially sighted people.
Burger Bar	Stanmore	✓	A temporary ramp for wheelchair users is available. An accessible toilet, in keeping with the guidance of BS 8300, is available. Has internal floor area of 93m <sup>2</sup>	
The Man in the Moon Pub	Stanmore		Access for wheelchair users is difficult and at times practically unviable. Accessible toilet locked and key was unobtainable. Has internal floor area of 279m <sup>2</sup>	
Bar Limited	South Harrow		Has no accessible parking or toilet facilities.	Provide guidance on creating good access to bars and restaurants, including delivery of accessible services in context to catering and hospitality. Include requirements for ensuring that outdoor tables and chairs do not hinder the movement of
Lobsters Fish bar	South Harrow		Has level access into the shop, but does not have accessible customer toilets. Has internal floor area of 74m <sup>2</sup>	
Rat and Parrot	Greenhill	✓	General access provisions have been made. Seating is provided outside and concern is raised for the safety of people with visual impairments. An accessible toilet has been provided. Has internal floor area of 242m <sup>2</sup>	
McDonalds Restaurant	Greenhill		Has designated car parking spaces but no side transfer area. Accessible toilet facility meets the specification of BS 8300. Has internal floor area of 407m <sup>2</sup>	

APPENDIX 2: Table to show the accessibility to various types of randomly surveyed public facilities in Harrow  Establishment	Ward	Accessible	Assessment Analysis	Action for SPD
Lontosa	Greenhill		No accessible facilities. Has internal floor area of 84m <sup>2</sup>	disabled people, nor compromise the safety of blind and partially sighted people.
Belmont Sandwich Bar	Belmont		Stepped entrance. Internal floor area of 65m <sup>2</sup> . Accessible WC.	
<b>13 Hotel and Bed &amp; Breakfast Accommodation assessed for accessibility and bedrooms designed to BS 8300</b>				
Old Etonian Hotel	Harrow-on-the-Hill		Not accessible to wheelchair users.	Ensure all new overnight accommodation meets the minimum requirements of BS 8300 and in any case is fitted out to the highest standard to allow 'home from home' independence by wheelchair users.
Madonna Halley's Hotel	Canons		No suitable access for wheelchair users; no access ramp to rooms and en-suite bathroom measures L=1.79 and W=1.56.	
Lyndon Hotel	Greenhill		No wheelchair access at the front of the house. No rooms that were wheelchair accessible	
Lindal Hotel	Greenhill		No wheelchair access at the front of the house. No rooms that were wheelchair accessible.	
Crescent Hotel	Greenhill		Not accessible to wheelchair users.	
Comfort Inn	Greenhill		The room allocated to wheelchair users is small, with limited manoeuvring space and the bathroom is small.	

APPENDIX 2: Table to show the accessibility to various types of randomly surveyed public facilities in Harrow  Establishment	Ward	Accessible	Assessment Analysis	Action for SPD
Grimsdyke Hotel	Harrow weald	✓	Rooms allocated to wheelchair users were sited in a separate annexe within close proximity to the main hotel. Access into the room was easy. The room was large, with level access into the ensuite bathroom (3.6m by 2.2m). The entire bathroom is a 'wet floor area' and has a pull-down seat for ambulant disabled people. A good example of how hotels should meet BS 8300.	minimum requirements of BS 8300, and in any case is fitted out to the highest of standard to allow 'home from home' independence by wheelchair users.
Premier Travel Inn	Kenton	✓	Accessible parking exists and access to the reception area is level. Access to the rooms is by ramp. The rooms are adequately sized with good space for wheelchair manoeuvring. Level access to en-suite bathroom is provided and there is adequate space for the manoeuvring of a wheelchair.	Ensure all new overnight accommodation meets the minimum requirements of BS 8300, and in any case is fitted out to the highest of standard to allow 'home from home' independence by wheelchair users.
Amay House	Greenhill		No wheelchair access exists.	
Hindes House	Greenhill		No wheelchair access exists.	
Kings guest house	Greenhill		No wheelchair access exists.	
Euro Hotel	North Harrow		No wheelchair access exists.	
Cumberland Hotel	Greenhill		No wheelchair access exists.	
Premier Travel Inn	Edgware	✓	Accessible parking exists and access to the reception area is level. Access to rooms is by ramp. The rooms are adequately sized with good space for wheelchair manoeuvring. Level access to en-suite bathroom is provided and there is adequate space for the manoeuvring of a wheelchair.	Ensure all new overnight accommodation meets the minimum requirements of BS 8300, and in any case is fitted out to the highest of standard to allow 'home from home' independence by wheelchair

<b>APPENDIX 2: Table to show the accessibility to various types of randomly surveyed public facilities in Harrow</b>  <b>Establishment</b>	<b>Ward</b>	<b>Accessible</b>	<b>Assessment Analysis</b>	<b>Action for SPD</b>
Kenton hotel			No accessible parking facility. No ramp access leading to the hotel reception.	users.

Access for All SPD Sustainability Objectives			APPENDIX 3: Table to tests the proposed objectives of the Access for All SPD against the SEA criteria to assess the likely impact of the SPD objectives on environmental factors The likely significant effects of the Access for All SPD objectives on the environmental factors in implementing the Access for All SPD. The table also shows the likely duration of these effects.										The following indicators will be used to monitor the implementation of the Access for All SPD Objectives	
Social	Economic	Environmental	Short Term	Medium Term	Long Term	Biodiversity, Flora & Fauna	Population & Human Health	Water and Soil	Air Quality	Climatic Factors	Archaeology & Heritage	Cultural	Landscape & Townscape	Material Assets
To ensure inclusively designed buildings and environments result from development			Presents within the Foreward, Introduction and specific section on Inclusive Design, a clear and positive message to professionals involved in the development process of the Council's firm intention to ensure access is better integrated										Increased number of buildings and environments designed in accordance with Urban Design principles with accessible features not permitted as compromised afterthoughts.	
+	+	+		✓	✓	+	+						+	+
To promote healthy living through provision of accessible health and fitness facilities			Presents within Leisure and Entertainment and specifically within Keeping Fit and Gyms, Swimming and Leisure Pools, access solutions for facilitating access to health and sporting facilities										Provision of at least one facility in Harrow which is designed, equipped and approved as an inclusive fitness facility	
+	+			✓	✓		+							+



Access for All SPD Sustainability Objectives			APPENDIX 3: Table to tests the proposed objectives of the Access for All SPD against the SEA criteria to assess the likely impact of the SPD objectives on environmental factors The likely significant effects of the Access for All SPD objectives on the environmental factors in implementing the Access for All SPD. The table also shows the likely duration of these effects.											The following indicators will be used to monitor the implementation of the Access for All SPD Objectives
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To provide a range of recreational and leisure facilities that are accessible to everyone			Provides specific guidance in Eating and Drinking Areas, Leisure and Entertainment, Places of Worship, Buildings of Special Architectural or Historic Interest, and Education and Learning Establishments, in relation to a range of facilities where deficiencies have been identified											Accessible health and fitness facilities in Harrow
+	+	+	✓	✓	✓		+					+	+	
To promote social inclusion of disabled people			Inclusive design detailed in every section of the document, applied in the context of everyday life. Promotion of social inclusion is addressed in Communicating and Assessing Services.											Increased number of disabled people active in community life
+	+	+	✓	✓	✓		+				+	+	+	

<p>Access for All SPD Sustainability Objectives</p>			<p><b>APPENDIX 3: Table to tests the proposed objectives of the Access for All SPD against the SEA criteria to assess the likely impact of the SPD objectives on environmental factors</b></p> <p>The likely significant effects of the Access for All SPD objectives on the environmental factors in implementing the Access for All SPD. The table also shows the likely duration of these effects.</p>										<p>The following indicators will be used to monitor the implementation of the Access for All SPD Objectives</p>	
														<p>Material Assets</p>
<p>Social</p>	<p>Economic</p>	<p>Environmental</p>	<p>Short Term</p>	<p>Medium Term</p>	<p>Long Term</p>	<p>Biodiversity, Flora &amp; Fauna</p>	<p>Population &amp; Human Health</p>	<p>Water and Soil</p>	<p>Air Quality</p>	<p>Climatic Factors</p>	<p>Cultural Heritage &amp; Archaeology</p>	<p>Landscape &amp; Townscape</p>	<p>Increased number of older buildings that are accessible</p>	
<p>To ensure that inadequate access provisions in existing buildings are remedied</p>			<p>Presents, within Alterations or 'Change of Use' Planning Applications, possible solutions and some requirement for improving access into and around existing buildings</p>											
<p>+</p>	<p>+</p>		<p>✓</p>	<p>✓</p>	<p>✓</p>		<p>+</p>					<p>+</p>	<p>+</p>	<p>+</p>

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Social	Economic	Environmental	Short Term	Medium Term	Long Term	Biodiversity, Flora & Fauna	Population & Human Health	Water and Soil	Air Quality	Climatic Factors	Cultural Heritage & Archaeology	Landscape & Townscape	Material Assets	
<p>To broaden the scope of good design through partnership working between the Council, local businesses, industry, and professionals involved in the development process</p>			<p>Invitation, within the Introduction, of partnership working between Council and planning applicants to achieve, acceptable access solutions, through early consultation with Development Control</p>										<p>Achievement of a more managed and aesthetically pleasing environment. More services accessible to disabled people</p>	
+	+	+	✓	✓	✓		+				+	+	+	

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Social	Economic	Environmental	Short Term	Medium Term	Long Term	Biodiversity, Flora & Fauna	Population & Human Health	Water and Soil	Air Quality	Climatic Factors	Cultural Heritage & Archaeology	Landscape & Townscape	Material Assets
To streamline procedures for incorporating access considerations into the development process			Introduces and places an obligation on planning applicants to submit access statements										All relevant planning applications received with an accompanying access statement
+	+	+	✓			+					+	+	+
To raise the profile of local need and ensure inclusive local services			Provides information on Leisure and Entertainment, Small Retail Units and within Leisure and Entertainment, on achieving inclusive and accessible services and addresses issues of disability etiquette										More services accessible to disabled people
+	+	+	✓	✓	✓	+					+	+	+

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To widen educational and skill-learning opportunities			It raises the issue by promoting the importance of inclusive education and life-long learning within Education and Learning Establishments										Increased take-up of further education by disabled people
+	+			✓	✓		+						
To promote accessible design that is consistent and beyond minimum standards			Exemplary standards recommended throughout the document, in-line with BS 8300										Developments that do not compromise the aesthetics of the environment
+		+	✓	✓	✓		+				+	+	+

<p><b>Access for All SPD Sustainability Objectives</b></p>			<p><b>APPENDIX 3: Table to tests the proposed objectives of the Access for All SPD against the SEA criteria to assess the likely impact of the SPD objectives on environmental factors</b></p> <p>The likely significant effects of the Access for All SPD objectives on the environmental factors in implementing the Access for All SPD. The table also shows the likely duration of these effects.</p>										<p>The following indicators will be used to monitor the implementation of the Access for All SPD Objectives</p>				
<p><b>Social</b></p>	<p><b>Economic</b></p>		<p><b>Environmental</b></p>			<p><b>Short Term</b></p>	<p><b>Medium Term</b></p>	<p><b>Long Term</b></p>	<p><b>Biodiversity, Flora &amp; Fauna</b></p>	<p><b>Population &amp; Human Health</b></p>	<p><b>Water and Soil</b></p>	<p><b>Air Quality</b></p>	<p><b>Climatic Factors</b></p>	<p><b>Cultural Heritage &amp; Archaeology</b></p>	<p><b>Landscape &amp; Townscape</b></p>	<p><b>Material Assets</b></p>	
<p>To provide a link between the Council's planning process and service provider's DDA obligations</p>			<p>Empowers planning applicants to achieve high standard access solutions by providing practical solutions to access issues, throughout the document</p>														<p>All relevant planning applications demonstrating integrated access provisions. Fewer developments requiring retrospective alterations to complement the DDA. Details of BS 8300 and Part M to the Building Regulations included on submitted plans and within Access Statements</p>
<p><b>+</b></p>	<p><b>+</b></p>		<p><b>+</b></p>			<p>✓</p>	<p>✓</p>	<p>✓</p>	<p></p>	<p><b>+</b></p>	<p></p>	<p></p>	<p></p>	<p><b>+</b></p>	<p><b>+</b></p>	<p><b>+</b></p>	
<p>To improve the quality of life for local people and reduce the strain on public health services</p>			<p>Provision within Leisure and Entertainment to create a community in which everyone can remain active</p>														<p>Reduction in the take-up of health related services for illness relating to inactivity</p>

<p>Access for All SPD Sustainability Objectives</p>			<p><b>APPENDIX 3: Table to tests the proposed objectives of the Access for All SPD against the SEA criteria to assess the likely impact of the SPD objectives on environmental factors</b></p> <p>The likely significant effects of the Access for All SPD objectives on the environmental factors in implementing the Access for All SPD. The table also shows the likely duration of these effects.</p>										<p>The following indicators will be used to monitor the implementation of the Access for All SPD Objectives</p>	
Social	Economic	Environmental	Short Term	Medium Term	Long Term	Biodiversity, Flora & Fauna	Population & Human Health	Water and Soil	Air Quality	Climatic Factors	Cultural Heritage & Archaeology	Landscape & Townscape	Material Assets	
+	+				✓		+							
<p>To encourage local spending by improving accessibility</p>			<p>Provides within Change of Use Planning Applications, Accommodation, Leisure and Entertainment, design solutions to create access into Harrow's small retail units. Requires access solutions as part of the planning process. It is considered that a more accessible environment may create increased traffic volume. However, it is considered that any likely impact on the environment will be minor and in any case will be outweighed by the social and economic benefits</p>										<p>Reduction in the number of inaccessible small retail units throughout the Borough</p>	
+	+	+/-		✓	✓		+		-			+		

<p>Access for All SPD Sustainability Objectives</p>			<p><b>APPENDIX 3: Table to tests the proposed objectives of the Access for All SPD against the SEA criteria to assess the likely impact of the SPD objectives on environmental factors</b></p> <p>The likely significant effects of the Access for All SPD objectives on the environmental factors in implementing the Access for All SPD. The table also shows the likely duration of these effects.</p>										<p>The following indicators will be used to monitor the implementation of the Access for All SPD Objectives</p>		
Social	Economic	Environmental	Short Term	Medium Term	Long Term	Biodiversity, Flora & Fauna	Population & Human Health	Water and Soil	Air Quality	Climatic Factors	Archaeology & Heritage	Cultural	Landscape & Townscape	Material Assets	
<p>To improve access to historic venues and the services and facilities contained within them</p>			<p>Empowerment of planning applicants to initiate acceptable access solutions within Buildings of Special Architectural or Historic Interest. Provides practical solutions to access issues, easy to obtain information and advice on access. Associated costs of adapting historic buildings can be mitigated through the increased social inclusion of disabled people</p>										<p>Reduction in the number of inaccessible buildings of special architectural or historic interest</p>		
+	+/-	+		✓	✓		+				+			+	



## **Appendix 4: Saved Harrow UDP policies relevant to the Access for All SPD which have been appraised (pages 16-17)**

### *Arts, Cultural, Entertainment, Tourist and Recreational Activities*

**SR2 PROVISION AND IMPROVEMENT OF ARTS, CULTURAL, ENTERTAINMENT, TOURIST AND RECREATIONAL FACILITIES WILL BE ENCOURAGED. FACILITIES PROPOSED SHOULD BE:-**

**A) ACCESSIBLE TO ALL;**

**B) ACCEPTABLE IN TERMS OF THEIR ENVIRONMENTAL IMPACT, ON RESIDENTIAL AMENITY, WILDLIFE, AND TRAVEL TO AND FROM THOSE FACILITIES; AND**

**C) LOCATED ACCORDING TO THE FOLLOWING CRITERIA:-**

- 1) HIGH INTENSITY ACTIVITIES SHOULD BE LOCATED IN TOWN CENTRES OR OTHER AREAS OF GOOD PUBLIC TRANSPORT ACCESSIBILITY.**
- 2) LOW INTENSITY ACTIVITIES OR ACTIVITIES THAT REQUIRE LARGE AREAS OF OPEN LAND BUT FEW BUILDINGS, SUCH AS GOLF COURSES, SPORTS PITCHES AND RIDING STABLES, MAY BE LOCATED WITHIN THE GREEN BELT AND METROPOLITAN OPEN LAND, PROVIDED THESE DO NOT CONFLICT WITH GREEN BELT AND METROPOLITAN OPEN LAND AIMS.**
- 3) FOR OTHER TYPES OF ACTIVITY (THOSE NOT COVERED BY THE ABOVE) PREFERENCE WILL BE GIVEN TO LOCATIONS EASILY REACHED BY PUBLIC TRANSPORT, WALKING OR CYCLING.**

### *Provision of Community Services*

**SC1 THE COUNCIL WILL SEEK TO ENSURE THE PROVISION OF APPROPRIATE AND ACCESSIBLE COMMUNITY SERVICES AND FACILITIES TO MEET THE NEEDS OF ALL WHO LIVE, WORK IN OR VISIT THE BOROUGH.**

### *Open Space*

**EP47 THE COUNCIL WILL PROTECT AND WHERE APPROPRIATE ENHANCE THE BOROUGH'S OPEN SPACES, PARKS, PLAYING FIELDS AND RECREATION GROUNDS, REGARDLESS OF OWNERSHIP. DEVELOPMENT, APART FROM SMALL SCALE ANCILLARY FACILITIES NEEDED TO SUPPORT OR ENHANCE**

THE PROPER FUNCTIONING OF THE OPEN SPACE, WILL NOT BE PERMITTED ON OPEN SPACES IDENTIFIED ON THE PROPOSALS MAP AND ON OTHER OPEN SPACES WITH RECREATIONAL, NATURE CONSERVATION OR AMENITY VALUE OR LOCATED IN AREAS LACKING SUCH SITES UNLESS THE SITE IS SURPLUS TO REQUIREMENTS OR SUITABLE ALTERNATIVE PROVISION IS MADE AVAILABLE.

*The Standard of Design and Layout*

**D4 THE COUNCIL WILL EXPECT A HIGH STANDARD OF DESIGN AND LAYOUT IN ALL DEVELOPMENT PROPOSALS. THE FOLLOWING FACTORS WILL BE TAKEN INTO ACCOUNT WHEN CONSIDERING PLANNING APPLICATIONS FOR DEVELOPMENT:**

- A) SITE AND SETTING;
- B) CONTEXT, SCALE AND CHARACTER;
- C) PUBLIC REALM;
- D) ENERGY EFFICIENCY, RENEWABLE ENERGY, SUSTAINABLE DESIGN AND CONSTRUCTION;
- E) LAYOUT, ACCESS AND MOVEMENT;
- F) SAFETY;
- G) LANDSCAPE AND OPEN SPACE; AND
- H) ADEQUATE REFUSE STORAGE.

**THE COUNCIL WILL REQUIRE PLANNING APPLICATIONS FOR NEW-BUILD DEVELOPMENT TO INCLUDE A SUPPORTING DESIGN STATEMENT.**

*Shopfronts and Advertisements*

**D25 SHOP FRONTS, BLINDS, CANOPIES AND SECURITY SHUTTERS SHOULD RESPECT THE SCALE, PROPORTIONS, AND CHARACTER OF THE BUILDINGS OF WHICH THEY FORM PART AND SHOULD BE APPROPRIATE TO THE AREA IN WHICH THEY ARE LOCATED. THE LOSS OF ATTRACTIVE SHOP FRONTS OR HISTORIC FEATURES WILL BE RESISTED.**

*New Education Facilities*

**C7 THE COUNCIL WILL SEEK TO ENSURE THAT APPROPRIATE EDUCATION FACILITIES ARE PROVIDED. IN CONSIDERING PROPOSALS FOR NEW SCHOOLS OR THE EXPANSION OF EXISTING ONES, THE FOLLOWING CRITERIA WILL BE TAKEN INTO ACCOUNT:**

- A) THE LOCAL POPULATION AND THE NEED FOR NEW EDUCATION FACILITIES IN THE AREA;
- B) ACCESSIBILITY OF THE SITE WITH REGARD TO ITS CATCHMENT AREA AND TO PUBLIC TRANSPORT, PAYING PARTICULAR REGARD TO ENSURING THAT THE SITE IS READILY ACCESSIBLE BY NON-CAR MODES AND INTEGRATED INTO THE SURROUNDING AREA; AND
- C) THE AVAILABILITY OF SAFE SETTING-DOWN AND PICKING-UP POINTS WITHIN THE SCHOOL SITE.

*Doctor's Surgeries*

**C9** IN CONSIDERING A PLANNING APPLICATION FOR :-

- A) THE CHANGE OF USE OF RESIDENTIAL PREMISES TO A GENERAL MEDICAL PRACTITIONERS' SURGERY; AND/OR
- B) EXTENSIONS TO RESIDENTIAL PREMISES BEING USED OR TO BE USED AS A GENERAL MEDICAL PRACTITIONERS' SURGERY, THE FOLLOWING CRITERIA MUST BE MET:-
  - 1) THE PROPOSAL SHOULD NOT HAVE AN ADVERSE IMPACT ON THE AMENITY OF NEIGHBOURING RESIDENTS OR THE CHARACTER OF THE LOCALITY;
  - 2) ADEQUATE PARKING SET OUT IN A VISUALLY ACCEPTABLE MANNER AND WITHOUT ADVERSE EFFECTS ON HIGHWAY SAFETY AND MOVEMENT MUST BE PROVIDED; AND
  - 3) THE PREMISES SHOULD BE EASILY ACCESSIBLE TO THE USERS.

*Access to Buildings and Public Spaces*

**C16** THE COUNCIL WILL SEEK TO ENSURE THAT BUILDINGS AS WELL AS PUBLIC SPACES ARE READILY ACCESSIBLE TO ALL, PARTICULARLY ELDERLY PEOPLE AND DISABLED PEOPLE, INCLUDING WHEELCHAIR USERS. DEVELOPMENT PROPOSALS SHOULD BE ADEQUATELY DESIGNED TO ACCOMMODATE THE NEEDS OF ALL USERS.

*Access to Leisure, Recreation, Community and Retail Facilities*

**C17** THE COUNCIL WILL SEEK TO ENSURE THAT ALL DEVELOPMENT RELATING TO RETAIL FACILITIES, LEISURE, RECREATION AND OTHER SERVICES ADEQUATELY ADDRESS THE NEEDS OF DISABLED PEOPLE, PARENTS WITH CHILDREN, THE ELDERLY AND OTHER PEOPLE WITH SPECIAL NEEDS.