

LONDON BOROUGH OF HARROW

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

1. Summary

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

2. Recommendations (for decision by the Cabinet.)

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

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

3. Consultation with Ward Councillors

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

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

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

5. **Relevance to Corporate Priorities**

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

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

The following issues are covered in this report:-

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

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

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

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

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

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

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

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

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

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

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

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

Housing Provision and Housing Need

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

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

WORKER ACCOMMODATION AND SHARED OWNERSHIP ACCOMMODATION;

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

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

- 2.81 ~~Whilst the Council's overriding responsibilities are to secure appropriate housing to meet the needs of Borough residents, due regard will need to be paid to the housing situation in London as a whole. For example, opportunities will exist for joint working with adjoining authorities to address problems in each authority. Additional housing provision is required to meet a wide range of housing need and demand. There is continuing population increase and growth in the numbers of households requiring housing in both London as a whole, and Harrow in particular. Because of its attractiveness, the Borough is faced with on-going housing demand from people outside the Borough, as well as housing needs and demand from Borough residents. The Council recognises that the Borough's economic welfare and maintenance of quality public services is dependent on sufficient housing being available for key workers, whilst continued provision of affordable housing will help secure sustainable communities in the Borough. Such housing will include social rented and shared ownership accommodation.~~**
- 2.82 PPG3 requires Local Planning Authorities to derive a housing provision figure from a capacity based study. The 1999 LPAC Housing Capacity Study fulfils this requirement. The results are reflected in the Policy (Criterion B). However, the Mayor's London Plan will set out the distribution of provision between Boroughs. Therefore the level of provision indicated in the Policy will be kept under review. It is anticipated that all new housing provision in the foreseeable future will be built on previously-developed land.**
- 2.83 New housing in the Borough will be secured from a variety of sources, as reflected in the Housing Capacity Study. Increasingly development has not only involved recycled urban land, but also recycled urban buildings such as vacant units over shops,**

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

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

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

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

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

Comparing the 1999 Housing Capacity Study Potential and Performance.

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

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

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

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

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

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

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

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

2004-2006 - 1,242 units

2007-2011 - 1,257 units

2012-2013 - 458 units

2004-2013 - 2,957 units

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

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

2) SH2: HOUSING TYPES AND MIX

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

THE COUNCIL WILL ENCOURAGE THE PROVISION OF A RANGE OF TYPES AND SIZES OF HOUSING TO MEET THE NEEDS OF ALL PROSPECTIVE OCCUPANTS, TO ENHANCE SOCIAL INCLUSION AND TO PROMOTE MIXED AND BALANCED COMMUNITIES.

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

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

3) EP46 AND PARA 3.139: OPEN SPACE

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

Open Space

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

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

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

Bring forward para 141 as new para 138

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

New para 138a

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

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

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

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

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

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

Replacement Policy T13

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

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

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

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

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

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

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

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

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

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

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

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

SCHEDULE 6 – CAR PARKING STANDARDS

Vehicle parking standards

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

Car-parking standards for non-residential development:

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

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

	bedrooms.
C2 Residential Institutions	Each development proposal to be assessed on its own merits provided a restraint-based approach is demonstrated
C2 Hospitals	Maximum of 1 space per 10 bedrooms Each development proposal to be assessed on its own merits, with separately designated parking for employees, visitors & customers – subject to a normal maximum of: -for visitors: 1 space per 10 beds
C3	(see below)
<ul style="list-style-type: none"> • D1 Non-residential institutions 	Maximum of 1 space per 300 – 600 m² net site area. Each development proposal to be assessed on its own merits, with separately designated parking for employees *, visitors & customers but no provision for students – subject to a maximum of: -for employees: 1 space per 300 – 600 m ² net site area, with separately designated parking for employees , visitors & customers.
D2 Assembly and Leisure	Each development proposal to be assessed on its own merits within the context of restraint based standards and the national advice maxima in PPG13.
Other non-residential buildings	Each case to be treated on its merits within the context of restraint based standards and the national advice maxima in PPG13.

Notes:

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

Adherence to the standards

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

Class A1 standards

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

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

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

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

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

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

~~Exceptional operational requirements~~

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

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

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

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

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

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

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

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

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

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

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

Location of car-parking spaces

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

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

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

Disabled people

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

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

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

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

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

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

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

The Council may also require that car-parking spaces for disabled people are located in a manner that facilitates their inspection for enforcement purposes.

Parking layout

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

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

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

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

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

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

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

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

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

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

Motor-cycle Parking

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

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

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

Provision for servicing for non-residential development

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

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

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

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

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

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

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

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

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

<u>Land Use</u>	Car-Parking Provision																		
C3 Dwelling Houses	The maximum Car-parking spaces should not will normally be provided as per exceed the following:																		
	<table border="0"> <tr> <td align="center">habitable rooms</td> <td align="center">resident spaces</td> <td align="center">visitor spaces</td> </tr> <tr> <td align="center" colspan="3">per dwelling unit</td> </tr> <tr> <td align="center">1 or 2</td> <td align="center">1.0</td> <td align="center">0.2</td> </tr> <tr> <td align="center">3</td> <td align="center">1.2</td> <td align="center">0.2</td> </tr> <tr> <td align="center">4</td> <td align="center">1.4</td> <td align="center">0.2</td> </tr> <tr> <td align="center">5 or more</td> <td align="center">1.6</td> <td align="center">0.2</td> </tr> </table>	habitable rooms	resident spaces	visitor spaces	per dwelling unit			1 or 2	1.0	0.2	3	1.2	0.2	4	1.4	0.2	5 or more	1.6	0.2
habitable rooms	resident spaces	visitor spaces																	
per dwelling unit																			
1 or 2	1.0	0.2																	
3	1.2	0.2																	
4	1.4	0.2																	
5 or more	1.6	0.2																	
i) private dwellings	but where lesser demand will be generated because of the criteria set out in the following section on "Adherence to the standards", levels will normally be reduced accordingly.																		
ii) housing association dwellings	As in (i) above																		
iii) local authority dwellings	As in (i) above																		
iv) old persons' dwellings	As in (i) above																		

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

Notes:

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

Adherence to the standards

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

- ~~accessibility to/by public transport, and~~
- ~~accessibility to local facilities, including shops, post office, health centres, etc.~~

~~and secondly according to the proportion of affordable housing in the overall mix.~~

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

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

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

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

Reducing Residential Parking

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

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

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

Disabled people

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

Layout of residential car-parking spaces

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

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

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

Pedal-cycle parking for residential development

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

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

3) H5: RESIDENTIAL DENSITY

The Inspector recommended the following re-worded policy:-

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

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

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

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

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

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

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

Context

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

The Inspector's Recommendation on H6 and H7.

The Inspector recommended 'that Policies H6 and H7, and supporting text, be deleted, to be replaced by a comprehensive single Policy setting out aims and procedures based on utilising the potential of all forms of affordable housing provision, to contribute to a Plan housing strategy over the Plan life, and in accordance with the advice of Circular 6/98'.

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

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

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

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

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

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

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

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

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

Affordable Housing Targets and recent performance

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

Affordable Housing Targets

Draft London Plan 1997 - 2016

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

Affordable Housing completions over past 4 years

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

Affordable Housing Funding Approvals over past 4 years

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

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

Affordable Housing Policy and Mixed-Use Development

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

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

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

Preamble

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

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

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

Replacement Affordable Housing Policy H6

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

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

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

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

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

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

Reasoned Justification

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

AFFORDABLE HOUSING TARGET

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

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

Reasoned justification

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

~~a) existing valid planning permissions;~~

~~b) established use certificates;~~

~~c) building control records; and~~

~~d) other Council records.~~

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

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

6) H19: MOBILITY AND LIFETIME HOMES

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

Accessible ~~Mobility and Lifetime Homes~~

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

12) C2: PROVISION OF SOCIAL AND COMMUNITY FACILITIES

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

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

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

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

9) C20: ACCESS TO BUILDINGS AND PUBLIC SPACES

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

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

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

(9.63 –9.65 to remain unmodified)

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

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

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

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

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

Site Reference: New Proposal Site

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

Proposal: Housing

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

7. Consultation

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

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

8. **Finance Observations**

- 8.1 Assuming that there is no need to re-open the Inquiry, the costs associated with the procedures for adopting the replacement HUDP can be met from existing budgets. No other financial comments.

9. **Legal Observations**

- 9.1 No comments.

10. **Conclusions**

- 10.1 Consideration of the recommendations in the Inspector's Report and the preparation of Proposed Modifications are an important stage in the process for adopting the new HUDP. In preparing the Proposed Modifications, the Council has been very mindful of the pending publication of the London Plan, and the need for the Replacement HUDP to be in general conformity with it. Importantly, Counsel's opinion has been sought on the development of appropriate revised policies and reasoned justifications, and the precise wording.

11. **Background Papers**

- 11.1 UDPAP 12 November 2003 (Agenda Item 9) – HUDP – Consideration of the Inspector's Report on the Public Local Inquiry.
Inspector's Report on Replacement Harrow UDP, the Planning Inspectorate, 13 August 2003.
Revised Deposit Replacement Harrow Unitary Development Plan – March 2002
PPG3 Housing – Influencing the size, type and affordability of housing – Government consultation - July 2003
Draft London Plan – June 2002
London Plan EIP Panel Report – July 2003

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