

**REPORT FOR: LOCAL DEVELOPMENT
FRAMEWORK PANEL**

Date of Meeting:	11 th March 2010
Subject:	Accessible Homes SPD
Key Decision:	Yes
Responsible Officer:	Stephen Kelly Divisional Director of Planning
Portfolio Holder:	Cllr. Marilyn Ashton Portfolio Holder, Planning, Development and Enterprise
Exempt:	No
Decision subject to Call-in:	Yes
Enclosures:	<u>Appendix A</u> : Table 1 Consultee comments & response; Table 2 Proposed changes to SPD <u>Appendix B</u> : Comparison of existing and proposed Lifetime Homes Standards <u>Appendix C</u> : Draft Accessible Homes SPD (2010)

Section 1 – Summary and Recommendations

This Report sets out the responses received following the 2009/10 public consultation on the revised Accessible Homes SPD and the proposed changes to the content of that document in light of the consultation responses. These amendments are reflected in the Draft Accessible Homes SPD (2010) (“the draft SPD”) and it is proposed that the draft document at Appendix C forms the basis of the final version of the SPD to be adopted.

Recommendations:

The Panel is requested to:

1. Note the post-consultation changes to the revised Accessible Homes SPD as outlined in Table 2 of Appendix A;
2. Recommend that Cabinet adopt the document at Appendix C as the 'Accessible Homes SPD (2010)'; and
3. Recommend that Cabinet authorise the Divisional Director of Planning to make any typographical corrections and any other non-material changes to the SPD that may become necessary prior to final publication of the SPD.

Reason: (For recommendation)

Public consultation on the draft SPD has now concluded,, the key issues raised in the consultation have been considered and, where necessary, the SPD has been amended. The draft SPD will, upon adoption, supersede the 2006 Accessible Homes SPD and become a material consideration in the determination of planning applications.

Section 2 – Report

Introduction

1. Lifetime Homes are those which achieve a set of standards aimed at producing accommodation that can be adapted to the needs of occupiers over a full life cycle and enable a wheelchair user to visit the property. Wheelchair Homes are those which achieve a design specification beyond the Lifetime Home standards sufficient to enable a wheelchair user to live independently.
2. London Plan Policy 3A.5 requires London boroughs to ensure that all new homes are built to 'Lifetime Home' standards with 10% to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. On 1st April 2008 the GLA began monitoring the implementation and delivery of Lifetime and Wheelchair Homes in all London boroughs. The outcome of this new strand of GLA monitoring, for the period 2008/09, will be published in the GLA's annual monitoring report at the end of February 2010.
3. Harrow Council has a long established commitment to the delivery of Lifetime and Wheelchair Homes, this is reflected in: (i) the existing Accessible Homes SPD adopted April 2006("the Existing SPD"); and (ii) initial monitoring results from the GLA which indicate that Harrow's achievement of Lifetime and Wheelchair Homes approvals, as a proportion of the borough's residential approvals for the 2008/09 period, is among the best in London. However, the existing SPD supplements a now deleted UDP policy and some of the standards contained within the existing SPD require both clarification and

renewal. Adoption of the draft SPD is intended to reaffirm the Council's strong commitment to the delivery of Lifetime and Wheelchair Homes and will also assist to ensure that Harrow maintains its excellent performance against GLA monitoring in this regard. The draft SPD once adopted will also contribute to the achievement of Harrow's vision to be recognised as one of the best London councils by 2012.

4. The adopted SPD will not only strengthen the delivery of Lifetime and Wheelchair Homes approvals from new build development, but will also clarify the requirements in relation to new homes created by conversion development. By continuing to secure Lifetime and Wheelchair Homes it is hoped that the adopted SPD will help to achieve the corporate priority of building stronger communities.

Options considered

5. None.

Background to the draft Accessible Homes SPD – 2010 (“the Draft SPD”)

6. The Existing SPD was adopted in 2006 but it has since become necessary to revise it following a Direction from the Secretary of State to delete Policy H18 of the Harrow Unitary Development Plan (2004) on 28 September 2007. At its meeting of 22nd September 2008 the LDF Panel agreed a revised version of the Accessible Homes SPD to reflect current best practice in Lifetime & Wheelchair Home Standards and to establish a clear link with the accessible housing requirements of the London Plan.
7. The initial draft SPD agreed by the Panel was the subject of public consultation between 16th October and 13th November 2008. The consultation was publicised in local newspaper advertisements, on the Council's website and via direct notification to a range of organisations and individuals. Seven responses were received (one representing two organisations).
8. The outcomes of the 2008 consultation were reported to the LDF Panel at its meeting on 28th April 2009. At that meeting it was proposed to make further changes to the SPD to include a supplement setting out (with illustrations and commentary) how the Council will apply Lifetime and Wheelchair Home Standards to proposals for the conversion of houses to flats. The LDF Panel resolved to recommend that the Portfolio Holder for Planning, Development & Enterprise approve the post-consultation changes to the draft SPD and to agree, the detailed content of a conversion supplement for a further round of public consultation.
9. A subsequent draft (incorporating the finalised conversion supplement) was reported to the LDF Panel at its meeting on 26th November 2009. The LDF Panel resolved to recommend that the Portfolio Holder for Planning, Development & Enterprise (“the Portfolio Holder”) approve

the revised document for public consultation, incorporating some minor alterations (“the Consultation Draft”). The Portfolio Holder’s approval was confirmed on 19th December 2009, and public consultation on the revised draft commenced on 11th January 2010 and closed at 5pm on 10th February 2010.

10. This report sets out the details of the consultation and the responses received. It then goes on to detail the proposed changes to the document in light of the consultation responses. The requirement for sustainability appraisal/strategic environmental assessment and post-adoption statement are set out at the end of this report.
11. The Draft SPD at Appendix C, incorporates the post-consultation changes to be reported to the LDF Panel on 11th March 2010 and the Panel’s recommendation to Cabinet will be reported verbally at the meeting. Upon adoption, the document will be known as the Accessible Homes Supplementary Planning Document (2010) and will be a material consideration in the determination of planning applications and appeals for relevant types of development.

Consultation overview

12. As noted above, the public consultation on the revised SPD commenced on 11th January and closed at 5pm on 10th February 2010. The consultation comprised of the following:

- public notices in the Harrow Observer and the Harrow Leader on 7th January and 14th January 2010 providing details of the draft document, a list of the local libraries and civic centre addresses where the document was available for inspection and the addresses (postal and e-mail) to which representations may be sent;
- over one thousand letters of notification sent to statutory consultation bodies, other organisations, planning consultants/developers, local groups and individuals on 6th January 2010. The letter and an attachment detailed the arrangements for inspection of the draft document at local libraries, the civic centre and via the Council’s online consultation website; and
- over 200 e-mail notifications sent to organisations and individuals on the LDF consultation database who have previously indicated a willingness to receive LDF communications online¹.

¹ Due to a technical fault with the automated online consultation system the e-mail notifications were sent out from the LDF Consultation e-mail address on 13th January. The fault on the automated system was repaired and further e-mails (to the same recipients) were sent out from the consultation website on 14th January. For this reason the original consultation close date of 8th February was extended to 5pm on 10th February.

13. To draw the proposed revised SPD to the attention of local architects and planning consultants, a presentation on the LDF including the emerging SPD was given to the inaugural meeting of the Harrow Agents' Forum on the evening of Wednesday 20th January 2010. The Forum was attended by approximately 20 persons. Attendees were advised of the consultation and how to take part.
14. Regulation 18(2) of the Town and Country Planning (Local Development) (England) Regulations 2004 provides for an SPD consultation period of not less than 4 weeks and not more than 6 weeks. The extension of the consultation from 4 weeks to 4 weeks and 2 days therefore sits within the period prescribed by the Regulations.
15. A total of thirteen consultation representations were received. Of these, six were to advise of no comment on the document (CABE², the Coal Authority, Harrow Heritage Trust, the Ministry of Defence, Natural England and the Theatres Trust) although two provided some general advice. CABE advised of its workshops and three key messages to local planning authorities preparing Core Strategies which is not considered directly relevant to the subject SPD. Natural England sought to draw attention to its Accessible Natural Greenspace Standards which, again, is not considered of direct relevance to the draft SPD (but will be useful in the preparation of other LDF documents).
16. As only one of the respondents used the questionnaire proforma that was made available on the Council's consultation website it is not appropriate to analyse the representations in relation to the consultation questions that were posed. Instead, the following qualitative analysis of the representations received sets out the principal issues raised. All of the consultation representations, and the recommended Council response to them, are reproduced in full at Table 1 appended to this report.
17. Material representations were received from the following seven consultees:
 - A2 Dominion Group (housing association/developer)
 - English Heritage (statutory consultee)
 - Dr. & Mrs Galbraith (residents)
 - Harrow Association of Disabled People (user group)
 - Roxborough Road Residents' Association (residents)
 - Transport for London (statutory consultee)
 - Greater London Authority (statutory consultee)
18. The principal issues raised by the housing association/developer respondent were as follows:
 - the SPD advice on pre-application services and referrals may need regularly updating (risk could date quickly); and

² Commission for Architecture and the Built Environment.

- do not agree that all conversions should be Lifetime Homes and one ground floor flat a Wheelchair Home – should be no requirement for a Wheelchair Home for conversion schemes not exceeding 10 units.

19. The principal issues raised by the user group respondent were as follows:

- status of document – should be used as part of Harrow’s Core Strategy;
- to be a flagship Borough the document should seek to achieve more than the minimum target for Wheelchair Home standards;
- even where parking is not normally provided, consideration should be given to accessible car parking bays;
- conservation considerations should not be a ‘get out clause’ for accessibility issues;
- appendix 1 needs to be clearer as to minimum standards and best practice; and
- appendix 2 should apply the 10% minimum Wheelchair Home target.

20. The principal issues raised by resident respondents were as follows:

- homes need to be accessible without the use of a lift; those who can only manage one or two flights of stairs should not be housed above second floor level;
- flats should not be built above five storeys and, if they are, should be served by two lifts as well as a staircase;
- buildings of four or more storeys should have a lift; those with six or more storeys should have at least two lifts;
- the same standards should apply to conversions and extensions as well as new build; and
- designated car parking provision should be made for disabled people outside their home (Wheelchair and Accessible Homes).

21. The principal issues raised by statutory consultees were as follows:

- the scope of the document should be clarified, there is opportunity to consider the wider public realm and heritage;
- the SPD should expand on aspects of wider accessibility (accessible public transport, walking routes, inclusive mobility standards, wayfinding, Legible London, shared space and accessible bus stops);
- developments should provide at least one designated parking space for disabled people and where general parking provided at least two such bays;
- references to the emerging replacement London Plan are needed; and
- changes are proposed to the Lifetime Home Standards and the relevant part of the Code for Sustainable Homes – where possible

scope should be made to incorporate potential changes to accessibility standards.

Response to principal consultation issues and proposed changes

22. A detailed breakdown of all of the proposed changes to the draft SPD is set out at Table 2 appended to this report. Of all of the principal issues raised by the consultees above, the most challenging to deal with is the GLA recommendation that the SPD should provide for the potential forthcoming changes to the Lifetime Home Standards.
23. There are two concurrent consultations underway proposing changes to the Lifetime Home Standards: the Government's consultation on changes to the Code for Sustainable Homes³ (launched 16th December) and Habinteg's Lifetime Homes website (launched 18th December). Both consultations run until mid-March. Annex C of the Code for Sustainable Homes consultation document, which lists the significant proposed changes to the Lifetime Homes criteria, is enclosed as a background paper to this report. Details of the new 16 Lifetime Home Standards are provided on the Habinteg website (<http://www.lifetimehomes.org.uk/news.php/23/lifetime-homes-and-consultation>) and are reproduced, alongside the existing 16 standards, at Appendix B to this report.
24. There are two key issues:
- alongside the proposed 16 new Lifetime Home Standards (LTHS), Habinteg have produced very detailed design specifications which it is proposed would become requirements to achieving the LTHS where the criterion is relevant; and
 - the proposals also include a definition of what is to comprise the 'entrance level' for the purposes of the LTHS, with clarification that homes with rooms on a different level to the entrance door, where that home is not served by an 'easy going' stair, cannot be classified as a 'Lifetime Home'.
25. The implication of the first bullet point above is that, if adopted in the form of the Consultation Draft the SPD could become out of date if the proposed Habinteg requirements and a new Code for Sustainable Homes were to be adopted. To at least partially overcome this (without delaying the SPD further), it is recommended that that *Local Implementation Supplement 1: Detailed Design Guidance* at Appendix 1 of the Consultation Draft be deleted and replaced with reference to the detailed design specification provided on the Habinteg website instead. A link to the website would also be provided on the Council's Accessible Homes SPD web page and print outs could be provided for issue with hard copies of the SPD. The 16 Lifetime Homes Standards in the draft SPD would remain as per the Consultation Draft, it is

³ *Sustainable New Homes: The Road to Zero Carbon: Consultation on the Code for Sustainable Homes and the Energy Efficiency Standard for Zero Carbon Homes (2009)*

considered that this is unavoidable without delaying the adoption of the SPD until after the consultations on the proposed changes to the Standards.

26. The implication of the second bullet point is more significant as this affects the interpretation of the Standards provided at *Local Implementation Supplement 2: Conversion of Houses to Flats* at Appendix 2 of the SPD. The Consultation Draft had sought to require all homes within a conversion to meet the Lifetime Home Standards (and for one ground floor flat to be a Wheelchair Home), relying on a local requirement to ensure sufficient space for a stairlift to qualify any first floor flat as a Lifetime Home. The proposed 'entrance level' definition (the subject of the consultations), would invalidate this interpretation and the physical & financial feasibility of requiring the installation of 'easy going' staircases to existing dwellings to facilitate a straightforward conversion to two flats is uncertain. Again, to expedite the adoption of the SPD, it is recommended that the supplement be amended so that the installation of an 'easy-going' stair (and therefore the Lifetime Homes Standards) becomes a requirement for first floor flats in conversion schemes where two or more flats are proposed above ground floor level. Where only one flat is proposed above ground floor level this would still be expected to meet the relevant Lifetime Home Standards where there is sufficient space for the future installation of a stairlift, thereby making the first floor the effective entrance level, but crucially these flats could not be formally categorised as 'Lifetime Homes'.
27. Turning to the other principal material issues on the Consultation Draft raised by consultees:
28. Pre-application and referrals content: it is recommended that chapter 1 be amended to omit this information, which it is agreed could rapidly date the SPD. Instead, provide this information on the Accessible Homes SPD page of the Council's website and on a paper leaflet to be issued with hard copies of the SPD. **Change.**
29. Application of standards: it is not considered that there is any justification for a 10 unit threshold for applying Wheelchair Home Standards for conversions, however a suggested change in relation to the application of Lifetime Home Standards to conversions is as set out above. The application of the Standards to extensions would be unreasonable and go beyond the scope of the SPD (and the policies that it seeks to supplement). **No change.**
30. Status of the document: as an SPD the document can only supplement the saved policies of the UDP, pending the adoption of a Core Strategy for Harrow and a Development Management Policies DPD. As a strategic document it would not be appropriate for the Core Strategy to reflect the level of detail in the SPD, but this SPD (?) will provide the basis for developing more detailed development management policies in relation to accessible housing. **No change.**

31. Targets: as an SPD, which supplements existing policies, the document cannot seek to exceed the targets for Wheelchair Homes; this would need to be explored with supporting evidence through development management policies. Appendix 2 (of the Consultation Draft) seeks at least one Wheelchair Home in conversion schemes and, as most conversion schemes involve less than ten units, this will contribute to achieving the 10% GLA target. **No Change**.
32. Parking: It is acknowledged that the relationship of the SPD with the London Plan position on parking for disabled people is unclear. It is therefore recommended that the relevant section of chapter 2 of the Consultation Draft be expanded to set out the London Plan position (i.e. that developments should provide an element of provision for disabled people). **Change**.
33. Conservation/heritage: given the statutory duties upon the local planning authority with regards to conservation areas and listed buildings it is considered that some flexibility in the application of the Standards will be required. However it is recommended that chapter 2 of the Consultation Draft be amended to reference English Heritage publications on inclusive design within the historic environment. **Change**.
34. Provision of lifts: the Wheelchair Home Standards require installation of two lifts where there are wheelchair homes above ground floor (WHDG 3.2.9) although, in developments of less than 10 homes, the second does not need to be a full size conventional lift but must be wheelchair accessible. The Lifetime Home Standards do not require installation of lifts in blocks of flats (the basic requirement is for the flats to be served by an 'easy going' communal staircase), the Consultation Draft was to have included a local requirement for a lift in developments of more than two storeys. As this local requirement would be lost by the proposed omission of the *Local Implementation Supplement 1: Detailed Design Guidance* it is recommended that this item be re-introduced to the Draft SPD as a footnote to LHS 5. **Change**.
35. No flats above five storeys: such a requirement would go beyond the scope of the SPD and the policies that it seeks to implement; in any event, the purpose of the Lifetime and Wheelchair Home Standards is to ensure that dwellings on any floor level are accessible. **No change**.
36. Clarification/scope of the document: the scope of the SPD is established by the DPD policy that it supplements - the scope of this SPD is not intended to apply to the accessibility of the wider public realm. However it is recognised that this could be clarified and reference be made to guidance on accessibility of the urban environment. Additional text to the introductory chapter 1 of the Consultation Draft is therefore proposed. **Change**.
37. Emerging London Plan: It is recommended that the section on the emerging London Plan in chapter 2 of the Consultation Draft be replaced with new paragraphs referencing the draft replacement

London Plan and its continued commitment to accessible housing. In the same vein, it is also recommended that subsequent paragraphs be updated to reflect the current position on Harrow's LDF and Core Strategy objectives. **Change.**

38. Minor changes to the background chapter and implementation supplement are also proposed, as detailed at Table 2 appended to this report.

Consultation & Adoption Statements

39. Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2004, requires the publication of consultation and adoption statements as soon as reasonably practicable after adoption.

40. The consultation statement must be prepared before an authority adopts an SPD. The statement must set out:

- the names of any persons whom the authority consulted in connection with the preparation of the SPD;
- how those persons were consulted;
- a summary of the main issues raised in those consultations; and
- how those issues have been addressed in the SPD.

41. The consultation statement, based upon this report, will be made available for inspection on the Council's website as soon as reasonably practicable following the adoption of the SPD.

42. The adoption statement must comprise:

- the date upon which the SPD was adopted;
- the right to apply to the High Court for permission to apply for judicial review of the decision to adopt the SPD; and
- that the right must be exercised promptly and in any event within 3 months of the date of the adoption of the SPD.

43. The adoption statement will be prepared and made available for inspection on the Council's website as soon as reasonably practicable following the adoption of the SPD.

Financial Implications

44. Upon adoption a number of hard copies of the SPD and related information & statements, as described in this report, will need to be produced. It is expected that the costs of this production can be contained within existing budgets.

45. The SPD will be used by planning officers in consideration of proposals for development, replacing the existing Accessible Homes SPD that

was adopted in 2006. It is not envisaged that the adoption of the revised SPD will incur any significant additional staffing resources.

Risk Management Implications

- Risk included on Directorate risk register? No
- Separate risk register in place? No

46. Accessible Homes SPD – risk management implications:

- The SPD will become out of date once new Lifetime Home Standards are adopted by Habinteg and for the Code for Sustainable Homes – this is a significant risk, but has been mitigated insofar as possible by the recommended omission of detailed design specification and cross reference to the Habinteg Lifetime Homes website
- The SPD adversely affect the delivery of new homes in Harrow – this is a low risk, because the requirement for Lifetime Homes and Wheelchair Homes is set out in the London Plan (existing and emerging replacement); the proposed SPD conversion supplement builds in sufficient flexibility to enable a reasonable balance to be struck between the accessible housing requirements and the constraints associated with conversion development
- The SPD will not be understood by developers/planners – this is a low risk, because the SPD has been made as simple as possible with cross reference to the Lifetime Homes website and illustrated examples have been provided in the conversion supplement
- The SPD will not be supported by Planning Inspectors – this is a low risk, because the SPD reflects London Plan policy

Equalities implications

47. No equalities impact assessment has been carried out in connection with the preparation of this SPD. This is because the SPD does not introduce new policy, rather it supplements existing UDP policies. Also the nature of the SPD, dealing with more accessible housing for everyone, is consistent with the principles of equality and unlikely to discriminate against any group or individuals.

Environmental Impact

48. Section 19(5), of the Planning and Compulsory Purchase Act 2004, (as amended) and Regulation 16(2) of the Town and Country Planning (Local Development) Regulations 2004 (as amended), no longer require local planning authorities to carry out sustainability appraisals of supplementary planning documents, although it remains within the discretion of local planning authorities to carry out such an appraisal where an SPD would involve significant social, environmental or economic effects not addressed by the appraisal of the development plan document which the SPD seeks to amplify.

49. However, the Council's legal advice reveals that, notwithstanding the removal of the requirement to carry out sustainability appraisal (covering economic & social as well as environmental effects), a Strategic Environmental Assessment (SEA) under the European Directive 2001/42/EC may still be required. The Directive, which applies to town and country planning, is given effect in the UK by the Environmental Assessment of Plans and Programmes Regulations 2004 ("the Environmental Assessment Regulations 2004") and this is unaffected by the recent changes. Consequently, the Council must satisfy itself that the requirements of the Environmental Assessment Regulations 2004 have been fulfilled.
50. The Environmental Assessment Regulations 2004 provide exemptions for: (i) plans and programmes that determine the use of only a small area at local level; and (ii) minor modifications to existing plans and programmes provided that the authority responsible has determined that the plan or programme is unlikely to have significant environmental effects. In relation to (ii) Government advice indicates that 'modification' should be interpreted as 'in elaboration of' when referring to SPDs, meaning that if an SPD elaborates an existing policy or policies then it should not be necessary to conduct an SEA provided that the SPD would be *unlikely* to have significant environmental effects.
51. The Draft SPD would, if adopted, apply to the whole Borough and cannot therefore benefit from the exemption under (i) above. However, following the Government's advice, exemption (ii) could apply as the SPD would elaborate existing saved policies in the Harrow Unitary Development Plan (2004) provided that significant environmental effects are unlikely. To establish the likelihood of such effects and therefore whether exemption (ii) does indeed apply, it was necessary carry out a 'screening' process and to consult Natural England, English Heritage and the Environment Agency as part of that process.
52. This screening process was carried out and completed in 2008 prior to the public consultation that was carried out in October/November that year. It was determined as a result of the screening process that Strategic Environmental Assessment of the SPD would not be required, because the document is considered to constitute a minor modification to the Harrow Unitary Development Plan, for which an environmental assessment was carried out prior to its adoption in 2004. When assessed against the prescribed environmental criteria, the Council has found that no significant environmental effects are likely to arise as a result of the SPD. The three consultation bodies concurred that there would be no significant environmental effects. It is not considered that the post consultation changes to the SPD have amended its content to a degree that would alter this conclusion.

Corporate Priorities

53. The SPD would contribute to the building of stronger communities by ensuring that new homes are flexible enough to meet an occupiers' changing needs over the full life cycle and that 10% of new homes are also suitable for wheelchair users.

Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 26 th February 2010		
Name: Izindi Visagie	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 23 rd February 2010		

Section 4 - Contact Details and Background Papers

Contact: Peter Barron, Principal Planning Officer, LDF Team, 020 8736 6086

Background Papers:

Accessible Homes SPD 2010 (proposed strike through and underline changes)

Sustainable New Homes – The Road to Zero Carbon (Annex C) (Dec 2009)

APPENDIX A - TABLE 1: CONSULTEES' COMMENTS AND RECOMMENDED RESPONSE

Consultee	Consultee Submission	Council's Response
A2Dominion group	<p>Introductory chapter <u>Answer to question 1:</u> the general advice in relation to planning applications is useful and should be retained in the final SPD. <u>Comment:</u> The introductory section may need to be updated more regularly as guidelines for referrals to the GLA or borough policy/structures change.</p>	<ul style="list-style-type: none"> • general support for introductory chapter noted • agree that paragraphs on pre-application services and referrals could date quickly; recommend removal of paragraphs 1.6 to 1.20 (inclusive) from the SPD and (i) reproduce as text on the web page that accompanies the downloadable SPD and (ii) reproduce as a separate leaflet to accompany hard copies of the SPD
	<p>Planning Policy <u>Answer to question 2:</u> agree that the SPD demonstrates a clear, justifiable relationship with Policies D4 and C16 of the Harrow Unitary Development Plan (2004).</p>	<ul style="list-style-type: none"> • support for relationship with saved UDP policies noted
	<p>Lifetime Homes Standards <u>Answer to question 3:</u> yes I understand the Lifetime Home Standards as set out at Chapter 4 of the SPD</p>	<ul style="list-style-type: none"> • support for the Lifetime Homes standards as presented in the SPD noted
	<p>Wheelchair Home Standards <u>Answer to question 4:</u> yes I understand the Wheelchair Home Standards as set out at Chapter 4 of the SPD</p>	<ul style="list-style-type: none"> • support for the Wheelchair Homes standards as presented in the SPD noted
	<p>Local Implementation Supplement 1 (Detailed Design Guidance) <u>Answer to question 5:</u> the detailed design guidance provided at Appendix 1 of the SPD is helpful to those proposing development as separate design advice. <u>Comment:</u> additional comments for affordable housing dwellings: Flatted blocks – main block entrance door, internal corridors and flat entrance doors should all be fitted with automatic openers/closer mechanisms Houses – w.c./a shower/wet room should be provided at ground floor level</p>	<ul style="list-style-type: none"> • see response to GLA comments below – recommend detailed design guidance be deleted and reference instead Habinteg design specifications on Lifetime Homes website

	<p>Local Implementation Supplement 1 (Conversion of Houses to Flats) <u>Answer to question 6:</u> No I don't agree with the Council's starting point that all flats in a conversion development should be Lifetime Homes and that a ground floor flat should be a Wheelchair Home. <u>Comment:</u> where conversions do not exceed 10 units then there should be no requirement to provide a Wheelchair Home.</p>	<ul style="list-style-type: none"> no justification for the proposed Wheelchair Home threshold of 10 units is put forward; monitoring shows that in Harrow the majority of house conversions involve less than ten units so the proposed threshold would be unlikely to help achieve implementation point 13 of the Mayor of London's 'Accessible London' SPG (2004) - no change recommended (but see response to GLA comments below re: Lifetime Home Standards and first floor flats)
CABE	<p>Unfortunately, due to limited resources, we are unable to comment on this document. However we would like to make some general comments which you should consider.</p> <p>A good spatial plan is essential to achieving high quality places and good design. CABE believes that getting the local development framework core strategies right is one of the most important tasks planners are undertaking. We have run workshops with over 65 local planning authorities to look at how design is being embedded in core strategy documents, which form part of the local development framework. The workshops offer local authorities independent informal advice from an expert panel and allowed us to identify the strengths and weaknesses of current approaches to spatial planning and how design, functionality and space are dealt with in core strategy documents.</p>	<ul style="list-style-type: none"> no comment noted advice relates to Core Strategies – not relevant to revised Accessible Homes SPD

<p>Three key messages for local planning authorities preparing core strategies have emerged from our workshops. These are now embedded within a CABE publication called <i>Planning for places: delivering good design through core strategies</i>. This publication is available to download from the CABE website www.cabe.org.uk/publications/planning-for-places</p> <p>The three key messages are also applicable to other LDF documents and you should keep these in mind when preparing other Development Plan Documents and Supplementary Planning Documents:</p> <p>Tell the story</p> <p>A good core strategy needs to tell the story of the place, explain how it works and highlight its qualities and distinguishing features. Telling the story helps everyone understand how the qualities of the place have shaped the strategy and its priorities for future quality. For more information about telling the story, please refer to the CABE website: www.cabe.org.uk/planning/core-strategies/tell-the-story</p> <p>Set the agenda</p> <p>Use the core strategy to say what is wanted for the area, express aspirations and be proactive and positive about the future of the place and say how this will be achieved. Set out what is expected in terms of design quality and where necessary provide links to the relevant development plan documents or supplementary planning documents. For more information about setting the agenda, please refer to the CABE website: www.cabe.org.uk/planning/core-strategies/set-the-agenda</p> <p>Say it clearly</p> <p>Make the core strategy relevant and understandable to a wide audience. Use diagrams to inform the text and communicate the strategy and show what quality of place means. For more information about saying it clearly, please refer to the CABE website:</p>	<ul style="list-style-type: none"> • it is considered that the three key messages have been reasonably incorporated into the preparation of the revised Accessible Homes SPD, insofar as relevant
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	<p>It is also important that there is a clear priority for design quality and place-making objectives in the core strategy, setting out the key principles. This needs to be explicit so that it cannot be challenged when applications are being determined.</p> <p>We have attached some key questions that we use in the workshops for you to consider throughout the development of your LDF. We would also like to respond by drawing your attention the following CABE Guidance that you might find useful:</p> <p><i>Making design policy work: How to deliver good design through your local development framework</i></p> <p><i>Protecting Design Quality in Planning</i></p> <p><i>Creating Successful Masterplans – a guide for clients and Design Reviewed Masterplans</i></p> <p><i>By Design: urban design in the planning system towards better practice</i> (published by DETR) www.cabe.org.uk/planning/core-strategies/say-it-clearly</p>	<ul style="list-style-type: none"> • advice noted for preparation of other DPD/SPDs in Harrow's LDF
The Coal Authority	Having reviewed your document, I confirm that we have no specific comments to make.	<ul style="list-style-type: none"> • no comment noted

<p>English Heritage</p>	<p>English Heritage welcomes the consideration being given by Harrow Council to improving the quality of life for its residents throughout the borough, particularly by achieving better access to the built environment especially homes. . It should be made clear at the outset whether this document deals with all aspects of the external and internal environment including those of great sensitivity such as the historic environment, which includes Listed Buildings, Conservation Areas, Registered Parks and Scheduled Monuments. For instance, there may be cases where planning permission is sought for developments within historic landscapes. In this case it may be necessary to include a consideration of the particular sensitivities and significance of historic landscapes and the historic public realm and what measures may be taken to include appropriate adaptations for inclusive access. Additionally it should be recognised that historic places may be of local rather than national significance but that they should be recognised for the contribution they make to local distinctiveness and sense of place. English Heritage's Conservation Principles (April 2008) describe how the range of heritage values are interrelated and can be applied to places which are of huge significance locally even if they are not recognised by a national designation. There are a number of principles which should underlie any new design or intervention which potentially impacts on the historic environment and these should be incorporated into the initial planning stage of any project when considering new developments or improvements.</p>	<ul style="list-style-type: none"> • the scope of the SPD is limited to accessibility within the home and within the curtilage of the home only; however recommend additional paragraphs at the introduction to clarify this
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	<p>We would be grateful for clarification of the scope of the document – although much of the document concentrates on physical access requirements within, and into buildings we would welcome the inclusion of sections that deal with the interface between buildings and their external environment. We would suggest that there is scope for expanding this into considering the public realm and considering how functional environments for all can be produced which taking into account differences in age gender or disability. This should mean that rather than concentrating solely on disabled or less mobile people when consulting on improvement works to buildings, to the public realm and open spaces these exercises would be widened to include all users in a truly inclusive study as recommended in CABE’s ‘The Principles of Inclusive Design’ (2006) and ‘Inclusion by Design (2009) where the focus is on creating places that everyone can use and takes account of such demographic shifts as an aging population.</p>	<ul style="list-style-type: none"> • as above - the scope of the SPD is limited to accessibility within the home and within the curtilage of the home only; however recommend additional paragraphs at the introduction to clarify this • public realm inclusiveness goes beyond the scope of the SPD (and the UDP policies it supplements) – no change recommended
	<p>We would suggest that if any impact is likely to occur to the historic environment that English Heritage’s two publications in which the principles of design inclusivity and the historic environment are set out: (‘Easy Access to Historic Buildings’ published in 2004 and ‘Easy Access to Historic Landscapes’ 2005 (joint English heritage/Heritage Lottery Fund)), are considered at the project planning stage</p>	<ul style="list-style-type: none"> • recommend that reference to these two publications be added to the ‘Conservation Areas and Listed Buildings’ section of Chapter 2 of the SPD
	<p>Additional guidance is to be found in the practical case studies published by English Heritage in ‘Streets for all’ (May 2008). This guidance is should be considered when developments are proposed in sensitive historic areas like conservation areas. Case studies 4 ‘Historic surfaces’ and 6 ‘Tactile paving’ include useful information on improving the public realm in order to benefit all users and contribute to an appreciation and enhancement of the historic environment. Section 2.4 Shared Surfaces similarly should take account of the character of a particular area where these enhancements are proposed and work out a series of principles for their implementation which continue to respect the traditional form and character of the place including use or respect for traditional materials at the same time as providing for the needs of its users and maintenance for the future.</p>	<ul style="list-style-type: none"> • public realm inclusiveness goes beyond the scope of the SPD (and the UDP policies it supplements) – no change recommended

Dr. & Mrs. R. F. Galbraith	Homes need to be accessible without the use of a lift. It is sensible to make all new or converted houses or ground floor flats wheelchair accessible.	<ul style="list-style-type: none"> LHS 5 requires communal stairs to provide easy access (i.e. be easy going) – no change recommended (see response to GLA comments re: detailed design guidance and LHS 5)
	Those with children and people who can manage only one or two flights of stairs flats should be not higher than the second floor.	<ul style="list-style-type: none"> it is beyond the scope of the revised Accessible Homes SPD to specify vertical distribution of family and non-family housing – no change recommended
	Flats should not be built above five storeys. However, if this restriction is not accepted then those six or more storeys high should have two lifts as well as a staircase. Even healthy people may develop problems in climbing stairs and lifts break down.	<ul style="list-style-type: none"> as above it is beyond the scope of the revised Accessible Homes SPD to specify vertical distribution of family and non-family housing – no change recommended (see response to GLA comments re: detailed design guidance and LHS 5)
Greater London Authority	The further round of public consultation on the document is useful, given the changing policy context both at strategic and local levels, with draft replacement London Plan and the emerging Harrow draft Core Strategy.	<ul style="list-style-type: none"> noted
	Overall, the document is clear and thorough and will provide a useful reference for developers and planners alike. It is noted that the majority of comments made by the GLA on the previous draft of this document in November 2008 have now been addressed and this is welcomed. However it is suggested that some reference to the draft replacement London Plan is made in sections 2.9 and 2.10 to 'future proof' the document.	<ul style="list-style-type: none"> recommend changes to chapter 2 to replace 'Planning for a better London' with new section on emerging replacement London Plan
	It should be noted that there are some proposed changes to the current accessibility standards, which can be viewed on Habinteg's Lifetime Homes website: http://www.lifetimehomes.org.uk/data/files/consultation/lifetimehomesconsultation_2009_10.pdf	<ul style="list-style-type: none"> recommend delete appendix 1/local implementation supplement 1 (detailed design guidance) and make direct reference to Habinteg's detailed design specifications, but retain existing 16 Lifetime Home Standards
	It is also recommended that consideration be given to the current consultation on the Code for Sustainable Homes: http://www.communities.gov.uk/publications/planningandbuilding/futureofcodeconsultation	<ul style="list-style-type: none"> add footnote to LHS 5 to retain local requirement for a lift serving Lifetime Homes in blocks of flats above two storeys

	Where possible, scope should be made to incorporate potential changes to accessibility standards within the SPD to ensure its ongoing effectiveness.	
Harrow Association of Disabled	2.12 Ensure this guidance is used as part of Harrow's core strategy	<ul style="list-style-type: none"> the core strategy is a strategic planning document; however the Development Management DPD can include more detailed policies including in relation to accessible homes – no change recommended
	2.13 Potential link with making Harrow-on-the-Hill station accessible campaign	<ul style="list-style-type: none"> beyond the scope of the revised Accessible Homes SPD – no change recommended
	2.13 Ensure that Highways maintenance is part of this	<ul style="list-style-type: none"> beyond the scope of the revised Accessible Homes SPD – no change recommended
	2.13 Ensure that pavements are maintained and kept clear from obstruction under this section	<ul style="list-style-type: none"> beyond the scope of the revised Accessible Homes SPD – no change recommended
	2.18 In Harrow, is it possible to aim for a higher percentage? The Wheelchair Homes Standard sets out the minimum requirement. In Harrow, it would be nice if we could achieve more than the minimum standard and become a flagship borough	<ul style="list-style-type: none"> an SPD can only supplement higher level planning policies – a higher target would need a separate DPD and justification for going beyond London Plan requirements; however initial monitoring shows that Harrow exceeds 10% wheelchair home approvals – no change recommended
	2.21 Even when parking is not normally provided, consideration should be given for the provision of accessible parking bays	<ul style="list-style-type: none"> the requirement for parking to serve Wheelchair Homes is reflected by standards WHDG 3.2.1 & WHDG 3.2.3 at paragraph 4.29 of the Accessible Homes SPD; however it is recommended that the 'Relationship with Parking Standards' section of chapter 2 of the SPD be revisited to set out the London Plan position on the provision of car parking for disabled people
	2.24 Ensure this is not used as a 'get-out' clause when applying for planning permission with regards to accessibility	<ul style="list-style-type: none"> given the statutory duty to consider the preservation or enhancement of conservation areas in the determination of planning applications some flexibility will be required – no change recommended

	3.3 Seems like a good way of ensuring compliance	<ul style="list-style-type: none"> • support for compliance paragraph noted
	4.2 Not having all disabled people grouped together is a positive step	<ul style="list-style-type: none"> • support for dispersal of Wheelchair Homes notes
	4.3 Having Wheelchair Homes for sale as well as to rent is a positive step	<ul style="list-style-type: none"> • support for multi tenure Wheelchair Homes noted
	4.5 It is good adaptations can be made without too much disruption	<ul style="list-style-type: none"> • support for adaptable Lifetime Homes noted
	4.17 Having a toilet at entrance level, is an important consideration	<ul style="list-style-type: none"> • support for entrance level w.c.s noted
	4.18 Having a bathroom which can easily be adapted is important. All the standards within the Wheelchair Homes specification is important	<ul style="list-style-type: none"> • support for adaptable bathrooms noted
	Appendix 1 It needs to be made clear; these are the minimum standards acceptable. Above and beyond this, could be considered best practice.	<ul style="list-style-type: none"> • see response to GLA comments – recommend detailed design guidance be deleted and reference instead Habinteg design specifications on Lifetime Homes website
	Appendix 2 2.17 Could the 10% minimum Wheelchair Homes not be applied?	<ul style="list-style-type: none"> • the expectation that one ground floor flat in a conversion scheme complies with Wheelchair Home Standards, reflects practicality issues and that most conversion schemes in Harrow involve less than ten units – no change recommended
Harrow Heritage Trust	Housing is actually outside the remit of HARROW HERITAGE TRUST, but any measures which help the needs of those with disabilities, have our full support.	<ul style="list-style-type: none"> • no comment noted
Ministry of Defence	In relation to the theme of this document, I can confirm the MOD has no safeguarding objections.	<ul style="list-style-type: none"> • no safeguarding objections noted
Natural England	<p>The attached letter indicated that Natural England has no formal comments to make with regards to this Supplementary Planning Document, the approach seems sound.</p> <p>Although we did not wish to make any formal comments I provided some general advice on our Accessible Natural Greenspace Standards (ANGST), which may be of use in respect of residential provision and increase in population numbers within the Borough. Below is the relevant section for your consideration.</p> <p>Accessible Natural Greenspace Standards Natural England believes that Local Planning Authorities should consider the</p>	<ul style="list-style-type: none"> • no formal comments noted • application of natural greenspace standards goes beyond the scope of the revised Accessible Homes SPD; however advice noted for other DPD/SPDs in Harrow LDF – no change recommended

	<p>provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green spaces providing for a range of recreation needs, of a least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:</p> <ul style="list-style-type: none"> • No person should live more than 300 metres from their nearest area of Natural Green Space; • There should be at least one accessible 20 hectare site within 2 kilometres; • There should be one accessible 100 hectares site within 5 kilometres; • There should be one accessible 500 hectares site within 10 kilometres. <p>This is recommended as a starting point for consideration by Local Authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than others, Natural England would encourage Local Authorities to identify the most appropriate policy and response applicable to their Borough.</p> <p>This can assist the Council with identifying the needs of the local community and increase awareness of the value of accessible natural Greenspace, along with the levels of existing Greenspace provision, resources and constraints.</p>	
Roxborough Road Residents' Association	<p>We have looked at the Accessible Homes draft SPG on behalf of the Roxborough Road Residents' Association and approve of its main content. We have the following comments:</p> <p>1) Wheelchair Homes need a worktop (other than the dining table) in the kitchen with enough space underneath for the arms of the wheelchair, so that the wheelchair user can prepare food.</p> <p>2) Enough space for access and turning of motorised wheelchairs is needed in wheelchair homes.</p>	<ul style="list-style-type: none"> • general support noted • see response to GLA comments – recommend detailed design guidance be deleted and reference instead Habinteg design specifications on Lifetime Homes website • the Wheelchair Home Standards incorporate requirements for turning/manoeuvring wheelchairs – no change recommended

	3) The same standards should apply to conversions and extensions as to new build.	<ul style="list-style-type: none"> the revised Accessible Homes SPD applies to conversions as well as new build (but conversion supplement recognises feasibility issues and need for pragmatism – also see response to GLA comments) – no change recommended it is not considered reasonable or appropriate to apply the Accessible Homes standards to domestic extensions – no change recommended
	4) Provision should be made to ensure that if a disabled person needs a designated parking space outside their home it can be provided. (This would apply to both Wheelchair Homes and Accessible Homes).	<ul style="list-style-type: none"> the requirement for parking to serve Wheelchair Homes is reflected by standards WHDG 3.2.1 & WHDG 3.2.3 at paragraph 4.29 of the Accessible Homes SPD; however it is recommended that the 'Relationship with Parking Standards' section of chapter 2 of the SPD be revisited to set out the London Plan position on the provision of car parking for disabled people Lifetime Homes are not required to have car parking spaces, this was clarified following objection by the GLA during the 2008 consultation; no change recommended
	5) Buildings of four or more storeys should have a lift. Larger developments and buildings with six or more storeys should have at least two independently functioning lifts (in case one breaks down).	<ul style="list-style-type: none"> the Standards incorporate a requirement for two lifts to Wheelchair Homes above ground floor level; see response to GLA comments re: detailed design guidance and LHS 5)
The Theatres Trust	The Theatres Trust is the National Advisory Public Body for Theatres and a Statutory Consultee. The Town & Country Planning (General Development Procedure) Order 1995, Article 10, Para (v) requires the Trust to be consulted on planning applications which include 'development involving any land on which there is a theatre.' It was established by The Theatres Trust Act 1976 and The Theatres Trust (Scotland) Act 1978 'to promote the better protection of theatres'. This applies to all buildings that were either built as theatres or are used for theatre presentations, in current use, in other uses, or disused.	<ul style="list-style-type: none"> no comment noted

	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and as this consultation is not directly relevant to the Trust's work we have no comment to make but look forward to being consulted on further planning policy documents especially the Core Strategy Submission stage and other planning policy documents such as Development Control Policies, Planning Obligations and any town centre Area Action Plan.	
Transport for London (Group Planning)	TfL notes that there is limited reference to transport within the SPD and recommends that the Borough expands on aspects of accessible public transport within the document. Accessible public transport plays an important role in providing access to opportunities, goods and services. Furthermore providing accessible walking routes as part of the public transport network is essential, in particular for those who may not have the ability to readily use other modes of public or private transport.	<ul style="list-style-type: none"> public transport and wider walking routes go beyond the scope of the Accessible Homes SPD (and the UDP policies it seeks to supplement) – but recommend minor changes to introductory chapter to clarify the scope of the SPD
	A reference to the Department for Transport <i>Inclusive Mobility</i> (Dec 2005) standards should be included in the SPD in relation to the pedestrian environment. It should be noted that all footways need to be a minimum 2 metres wide to meet these standards, unless physical constraints render this not possible. TfL recommends that Section 4.27 of the SPD should be reviewed against the DfT guidance to ensure compatibility.	<ul style="list-style-type: none"> the Inclusive Mobility standards relate to the wider public realm and goes beyond the scope of the Accessible Homes SPD (and the UDP policies it supplements) which deals with matters within the curtilage of the home – no change recommended
	TfL generally supports Section 4.29 Approach to the Home. However in accordance with London Plan Policy 3C.23 Parking strategy and London Plan: consultation draft replacement (Oct 2009) Policy 6.13 Parking, developments should have at least one accessible on or off street car parking bay designated for use by disabled people, even if no general parking is provided. All developments with associated off-street parking should have at least two parking bays for use by disabled people. The appropriate number of bays will depend on the size, location and nature of the development, the existing supply of and demand for on and off street car parking and the accessibility of the local area. For proposed developments with only one car parking space, applicants should survey and assess the demand and accessibility of existing facilities to demonstrate where disabled drivers can park in order to easily use the development.	<ul style="list-style-type: none"> the requirement for parking to serve Wheelchair Homes is reflected by standards WHDG 3.2.1 & WHDG 3.2.3 at paragraph 4.29 of the Accessible Homes SPD; however it is recommended that the 'Relationship with Parking Standards' section of chapter 2 of the SPD be revisited to set out the London Plan position on the provision of car parking for disabled people

	<p>TfL wishes to see a reference to wayfinding within the SPD; wayfinding plays an important role in the production of accessible environments and giving people the confidence to make more journeys on foot. TfL would like to see the Legible London principles applied to pedestrian routes in the Borough. The inclusion of these references would support London plan: consultation draft replacement (Oct 2009) Policy 6.10 Walking.</p>	<ul style="list-style-type: none"> wayfinding and Legible London again relate to the wider public realm and go beyond the scope of the Accessible Homes SPD (and the UDP policies it supplements) which deals with matters within the curtilage of the home – no change recommended
	<p>TfL is concerned that there has been no reference to Shared Space within the document; given that residents of accessible homes will also want to easily access the wider urban environment, it is felt that the SPD would benefit from addressing access beyond the boundaries of the residential property. Shared Space provides tangible benefits, for example, via the utilisation of colour and tactile information to communicate shared space to vulnerable users. The Borough will be aware how important it is to address the issues around Shared Space schemes and put appropriate guidance in place, in particular for groups such as the blind and guide dog assisted users, wheelchair users and the elderly.</p>	<ul style="list-style-type: none"> the Shared Space concept concerns the management & maintenance of streets and public spaces to create a better balance of priorities between pedestrians and drivers; again this relates to the wider public realm and goes beyond the scope of the Accessible Homes SPD (and the UDP policies it supplements) which deals with matters within the curtilage of the home – no change recommended
	<p>TfL recommends that a reference should be made to making bus stops throughout the Borough accessible inline with TfLs bus stop accessibility guidance, <i>Bus Priority Team technical advice note BP1/06</i> (Jan 2006). In order to achieve greater bus stop accessibility, and more generally, the Borough should utilise developer funding through s.106 agreements. The inclusion of the above reference would support London Plan Policy 3C.20 '<i>Improving conditions for buses</i>' and London plan: consultation draft replacement (Oct 2009) Policy 6.7 '<i>Buses, bus transits, trams</i>'.</p>	<ul style="list-style-type: none"> the design of bus stops goes beyond the scope of the Accessible Homes SPD (and the UDP policies it supplements) which deals with matters within the curtilage of the home – no change recommended
	<p>Finally, TfL would welcome joint working with the London Borough of Harrow. In particular, where further information is being developed on transport related issues within the SPD, we would welcome further dialogue with the relevant modes of TfL.</p>	<ul style="list-style-type: none"> noted

APPENDIX A - TABLE 2: PROPOSED STRIKETHROUGH AND UNDERLINE CHANGES TO SPD

BACKGROUND		
Background		
Paragraph No.		Proposed Change
consult version	final version	
i.5	i.5	Delete sentences after ...prepared. For these reasons, the document is once again the subject of public consultation. Any new comments arising out of the second consultation will be taken into account and further changes will be made to the document as appropriate. If the Council decides to adopt the document, the SPD will become a material consideration in the determination of relevant applications for planning permission.
i.5	i.5	After ...prepared add the following <u>This second version of the revised SPD was the subject of a second round of public consultation in January/February 2010 and the outcome of the consultation, together with consequent changes to the document, were reported to the Local Development Framework Panel and the Cabinet in accordance with the Council's constitution. The Cabinet resolved to adopt the document as the 'Accessible Homes SPD (2010)' at its meeting on 18th March 2010. The SPD forms part of the Harrow's Local Development Framework and is a material consideration in the determination of relevant planning applications and appeals in the Borough.</u>

CHAPTER 1		
Introduction		
Paragraph No.		Proposed Change
consult version	final version	
1.6	-	Delete existing heading and paragraph. Place onto appropriate website page and leaflet not part of SPD. Pre-Application Design and access are fundamental planning considerations and in most cases will be the guiding principles when determining the appropriate form and layout of development on a site. It is therefore vital that these considerations inform the inception and evolution of development projects.
1.7	-	Delete existing paragraph. Place onto appropriate website page and leaflet not part of SPD. Those proposing development are encouraged to engage with the Council at an early stage. Such engagement around design and access issues at project inception will help to establish the parameters for development and, with an on-going pre-

		application dialogue, will increase the likelihood that the evolution of the scheme will meet the Council's expectations with regard to design and access. Pre-application approaches can also help to avoid wasted expenditure progressing schemes that are unlikely to be acceptable in principle to the Council.
1.8	-	Delete existing paragraph. Place onto appropriate website page and leaflet not part of SPD. The Council offers the following pre-application services:
1.9	-	Delete existing heading and paragraph. Place onto appropriate website page and leaflet not part of SPD. Pre-Application Meetings (PAMs) This service offers the opportunity for developers proposing larger scale projects to meet with Council officers to discuss planning issues raised by the proposal. The range of officers present will depend on the particular constraints of the site and the nature of the proposal. This is a chargeable service.
1.10	-	Delete existing paragraph. Place onto appropriate website page and leaflet not part of SPD. Details of the charges and a proforma for arranging such a meeting can be found on the Council's website: http://www.harrow.gov.uk/downloads/Pre-Application-Meeting-Form-April-2007.pdf
1.11	-	Delete existing heading and paragraph. Place onto appropriate website page and leaflet not part of SPD. Planning Advice Team The Planning Advice Team meets fortnightly and comprises Council officers from development control, planning policy, conservation, trees & landscaping, urban design, access, building control, highways and housing, as well as a representative from the Metropolitan Police. The team considers pre-application submissions made in advance of the meeting and, following the meeting, a planning co-ordinated formal written response is provided. This is a chargeable service.
1.12	-	Delete existing paragraph. Place onto appropriate website page and leaflet not part of SPD. Details of the charges and a proforma for arranging such a meeting can be found on the Council's website: http://www.harrow.gov.uk/downloads/Planning-Advice-Team-Notice-April-2007.pdf
1.13	-	Delete existing heading and paragraph. Place onto appropriate website page and leaflet not part of SPD. Duty Planner Service A planning officer is available for face-to-face or telephone consultation at the Council's Civic Centre between 9am and 12.30pm Mondays-Fridays. However the duty planner cannot give detailed comment on development proposals (see PAT & PAM services above) but can provide general planning advice and guidance in relation to householder developments and minor alteration schemes.
1.14	-	Delete existing paragraph. Place onto appropriate website page and leaflet not part of SPD. Visits to the duty planner operate on a first come, first served basis. Please come to the second floor reception, Civic Centre, Station Road, Harrow, HA1 2UY, and ask for the duty planner. Alternatively you can contact the duty planner on 020 8736 6068 or e-mail duty.planner@harrow.gov.uk
1.15	-	Delete existing heading and paragraph. Place onto appropriate website page and leaflet not part of SPD. Cases Referable to the Mayor of London Planning applications of potential strategic importance must be referred by the Council to the Mayor of London. The types of

		application of potential strategic importance are grouped under the following headings: large scale developments; major infrastructure projects; development that may affect strategic policies; and any other development that the Mayor must be consulted upon by direction of the Secretary of State. Where he sees fit the Mayor is empowered to direct refusal of a planning application or, in certain circumstances, he may assume the decision making power of the local planning authority to determine the application himself.
1.16	-	Delete existing paragraph. Place onto appropriate website page and leaflet not part of SPD. The Mayor's planning powers, including more detailed definitions of the types of applications of potential strategic importance, are set out in the Town and Country Planning (Mayor of London) Orders 2000 & 2008. You can also view the Mayor's website planning pages at: http://www.london.gov.uk/mayor/planning_decisions/mayors_role.jsp
1.17	-	Delete existing paragraph. Place onto appropriate website page and leaflet not part of SPD. Proposals that are referable to the Mayor must be accompanied by a full Transport Assessment. Such assessments can help to predict the transport impacts of development proposals and in so doing help to inform strategic planning decisions. Transport for London's document 'Transport Assessment best practice' (2006) provides guidance which may be used in the preparation of assessments; it can be viewed at the TfL website: http://www.tfl.gov.uk/assets/downloads/corporate/TAGuidance_LQ.pdf
1.18	-	Delete existing paragraph. Place onto appropriate website page and leaflet not part of SPD. Travel Plans are a separate tool that can be used to influence or modify travel choices by employees and visitors to a site in order to achieve more sustainable methods of transport. Transport for London's best practice document advises that Travel Plans will be required for most referred applications and should be submitted alongside the Transport Assessment. However Travel Plans are useful tools for all developments with significant transport implications, as set out in Planning Policy Guidance Note 13: <i>Transport</i> (2001), and not just those referable to the Mayor of London. Advice on the preparation of workplace travel plans may be obtained from the Transport for London website: http://www.tfl.gov.uk/corporate/projectsandschemes/workplacetravelplanning/7678.aspx
1.19	-	Delete existing heading and paragraph. Place onto appropriate website page and leaflet not part of SPD. Greater London Authority & Transport for London pre-Application Advice The Greater London Authority provides a pre-application advice service to inform applicants on how best to ensure that proposals comply with the Mayor's London Plan. Meetings with the Authority include representation from Transport for London and will usually be appropriate for cases that would be referable to the Mayor of London (see above). The service is subject to charging; details can be viewed via the Mayor's website: http://www.london.gov.uk/mayor/planning_decisions/docs/guidance-note.pdf
1.20	-	Delete existing paragraph. Place onto appropriate website page and leaflet not part of SPD. Transport for London provides a separate pre-application advice service in relation to strategic transport issues and the Mayor's Transport Strategy. This service is also subject to charging; details can be viewed via the TfL website: http://www.tfl.gov.uk/corporate/about-tfl/boroughpartnerships/6011.aspx
-	1.6	Insert new heading and paragraph Scope of this Supplementary Planning Document

		This SPD, properly applied, will assist all those involved in the design and planning of new homes to create adaptable, accessible accommodation for everyone in the community. Its scope is the home and the curtilage of the home. Developments that create new public realm should extend the Accessible Home principles to the wider environment, to embrace the emerging concept of the 'Lifetime neighbourhood'. Accessible public transport plays an important role in providing access to opportunities, goods and services. The provision of accessible walking routes is essential, in particular for those who may not have the ability to readily use other modes of public or private transport, and as part of the creation of more legible environments which give people the confidence to make more journeys on foot.
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CHAPTER 2

Planning Policy		
Paragraph No.		Proposed Change
consult version	final version	
2.9	-	<p>Delete existing heading and paragraph Planning for a Better London (2008)</p> <p>'Planning for a Better London' sets out the new Mayor of London Boris Johnson's priorities and policy direction under his administration. Chapter two of 'Planning for a Better London' addresses the key challenges facing planning in London amongst which is included the need to plan for all Londoners: promoting Lifetime Homes to address the shortage of appropriate housing for disabled & older people and planning lifetime neighbourhoods for all. This translates as a key policy response at Chapter three to "promote good quality, livable and sustainable neighbourhoods" by, amongst other things, addressing the housing needs of disabled & older people and encouraging Lifetime Homes.</p>
-	2.9	<p>Insert new heading and paragraph Consultation draft replacement London Plan (2010)</p> <p>Following an earlier consultation in his proposals for a new London Plan [footnote: Planning for a Better London (2008)], the Mayor of London published a draft replacement London Plan in October 2009. The replacement Plan will be considered by a Planning Inspector at an examination in public during 2010 and, subject to any resulting changes and Ministerial consideration, is expected to be adopted during 2011. Policy 3.8 <i>Housing choice</i> of the consultation draft Plan confirms the Mayor of London's commitment to accessible housing by restating the existing London Plan requirement that LDFs should require all housing to be built to Lifetime Home Standards and for ten per cent of housing to be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.</p>
2.10	-	<p>Delete existing paragraph</p> <p>At Chapter four of 'Planning for a Better London' the Mayor has undertaken to prepare a revised SPG on accessibility and inclusive environments, to replace the existing document 'Accessible London – Achieving an Inclusive Environment'. At the time of writing (Autumn 2009) confirmation of the revised SPG and consultation are awaited.</p>
	2.10	Insert new paragraph

		<u>The Mayor of London has also consulted upon a draft Housing Design Guide and has confirmed his intention to produce revised SPGs (on housing and accessibility) to follow the adoption of the replacement London Plan. When produced and insofar as their content is relevant to the Lifetime and Wheelchair Homes Standards, these may also be referred to alongside this SPD.</u>
2.12	-	<p>Delete existing paragraph</p> <p>The Core Strategy will form the centrepiece of the Harrow Local Development Framework; it will determine how population and housing growth will be accommodated in the Borough and how that growth will be supported by infrastructure and economic development. Although the Core Strategy for Harrow is still being developed, a number of cross-cutting objectives have been established which include (summarised):</p> <ul style="list-style-type: none"> • The need to ensure that development meets the needs of residents and business without compromising the well being of future generations; • The promotion of community safety in the design of new development; • To ensure that all residents have a choice of good quality and affordable housing; • To promote walking and cycling and ensure the best possible access to reliable public transport; and • To ensure that new developments are of high quality design and enhance the existing public realm.
-	2.12	<p>Insert new paragraph</p> <p><u>For a period of six weeks during the winter of 2009/10 the Council consulted on its preferred option for the Harrow Core Strategy. In conjunction with proposals included in the consultation draft replacement London Plan, the preferred option document seeks the designation of a Harrow & Wealdstone Intensification Area to deliver new homes, retail growth and employment renewal on strategic previously developed sites within the central area. The preferred option also envisaged redevelopment within the Borough's network of district local centres and on identified previously developed sites elsewhere, whilst open space would continue to be protected and the character of more suburban areas would be safeguarded. Eight strategic objectives for the Core Strategy were developed and, within the housing objective, the document sought to contribute to the creation of sustainable communities by ensuring that new development meets accessible homes standards and promotes the creation of lifetime neighbourhoods.</u></p>
2.13		<p>Delete existing paragraph</p> <p>In line with the London Plan, Harrow's Core Strategy will seek to co-ordinate growth with public transport accessibility in the Borough. Whilst this will ensure that future patterns of housing and other development better relate to public transport than has historically been the case, the full benefit of providing accessible homes will not be realised unless attention is also paid to the quality of the environment surrounding development. The Core Strategy's strategic planning policies will reflect the cross-cutting objectives and will set the context for the other development plan documents. The creation of an inclusive environment will</p>

		therefore be a common thread throughout Harrow's Local Development Framework.
	2.13	Insert new paragraph The next stage for the Harrow Core Strategy is a further stage of consultation, known as the 'pre submission' stage. The document will then be submitted to the Planning Inspectorate for an examination in public. The Planning Inspector's recommendations are binding upon the Council and, once adopted, the Core Strategy and its policies will be a material consideration in the determination of planning applications in Harrow.
2.21	-	Delete existing paragraph The London Plan and Harrow's UDP sets out a range of maximum parking standards for residential development and it is anticipated that future development growth in the Borough will occupy areas well served by public transport. In these areas it is likely that residential development will take the form of higher density flatted schemes; where limited car parking is incorporated into these schemes it will take the form of communal provision – for example in basements. It is envisaged that in these circumstances Lifetime Homes design criterion 2 (car parking distances to the home) will be relevant. Advice on the applicability of distances between parking spaces and communal entrances to blocks of flats, and the relationship between basement parking and lift cores, is provided at the website: www.lifetimehomes.org.uk
-	2.21	Insert new paragraph The London Plan and Harrow's UDP set out a range of parking standards for residential development. The standards are maximum and, in appropriate circumstances, this will lead to developments with levels of parking provision equivalent to less than one space per home and in some instances no general car parking provision. However, in line with the approach set out in the London Plan, developments should make provision for disabled people with at least one accessible on or off street car parking bay designated for use by disabled people, even if no general parking is proposed. All developments with associated off street car parking should have at least two bays for use by disabled people.
2.22	-	Delete existing paragraph Where no car parking is to be provided, neither criterion 1 nor 2 will be relevant to the achievement of Lifetime Home status. Elsewhere in the Borough, where small scale infill developments occur for example of traditional dwellinghouses, it is likely that curtilage car parking will continue to be provided. In these circumstances it is envisaged that Lifetime Homes design criteria 1 or 2 would apply.
-	2.22	Insert new paragraph The requirement for accessible parking for disabled people does not mean that all homes require a car parking space. Although Lifetime Home Standards 1 & 2 prescribe the form and distance of a car parking space in relation to the home, this should not be interpreted as meaning that Lifetime Homes <i>require</i> a car parking space. Where no car parking is to be provided, neither criterion 1 nor 2 will be relevant to the achievement of Lifetime Home status. By contrast one accessible parking space will be required for each Wheelchair Home, including development that would otherwise car free.
-	2.25	Inset new paragraph English Heritage, in partnership with the Heritage Lottery Fund, has set out principles of design inclusivity within the historic environment in its publication ' <i>Easy Access to Historic Buildings</i> ' (2004). When developments involve the wider public realm of

		the historic environment, the related English Heritage publication ' <i>Easy Access to Historic Landscapes</i> ' (2005) may also be of use.
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CHAPTER 4		
Designing Accessible Residential Developments		
Paragraph No.		Proposed Change
consult version	final version	
4.7	4.7	Add additional sentence Detailed design specification for each of the Standards are provided on the website http://www.lifetimehomes.org.uk .
4.12	4.12	Add footnote after ...reached by a lift[], the... [] in blocks of flats which are more than two storeys high a communal lift should be provided.

APPENDIX 1		
Local Implementation Supplement 1: Detailed Design Guidance		
Paragraph No.		Proposed Change
consult version	final version	
Appendix 1 Local Implementation Supplement 1: <i>Detailed Design Guidance</i>	-	Delete all contents

APPENDIX 2		
Local Implementation Supplement 2: Conversion of Houses to Flats		
Paragraph No.		Proposed Change
consult version	final version	
Appendix 2 Local Implementation Supplement 2: <i>Conversion of</i>	-	Rename as Appendix 1 and Local Implementation Supplement: Conversion of Houses to Flats

<i>Houses to Flats</i>		
2.2	1.2	Insert between 'requirements' and 'but' (fourth line) <u>, particularly with flats above ground floor level,</u>
2.4	-	Delete existing paragraph As noted above, the Council will expect all homes that are being provided as part of a conversion scheme to comply with the relevant Lifetime Home Standards, where this is feasible. It is envisaged that feasibility issues will occur only occasionally because of, for example, unresolvable physical barriers or other planning constraints such as conservation area and listed building considerations. Where feasibility issues do occur in relation to a specific Lifetime Home Standard, the Council will consider whether failure to comply with the Standard is critical to the occupation of the dwelling as a Lifetime Home. If it is not critical, then the development will be expected to comply with all other relevant Lifetime Home Standards on the basis that the home could still be suitable for many occupiers in need of flexible, lifetime housing.
-	1.4	Insert new sentence at beginning of paragraph <u>All homes, whether the result of new build or conversion development, should comply with the relevant Lifetime Home Standards. For flats above ground floor level to be classified as 'Lifetime Homes', however, they need to be reached by an 'easy going' stair[footnote – see below]. In a straightforward conversion of a house to two flats, one on the ground floor and one on the first floor, the Council recognises that it will not normally be feasible to install an 'easy going' stair and that, consequently, the first floor flat cannot be categorised as a Lifetime Home. Nevertheless, the Council is committed to more inclusive, adaptable housing and will continue to apply the Lifetime Home Standards to the first floor flat where there is sufficient stair width and lobby/landing space for the future installation of a stair lift. In other conversion schemes, where two or more flats are to be provided above ground floor level, these should be served by an 'easy going' stair and therefore be fully compliant with the Lifetime Home Standards.</u>
		Insert new footnote to new sentence as above <u>Footnote: An 'easy going' stair should have maximum uniform risers of 170mm, minimum uniform goings of 250mm, and a minimum width on stairs of 900mm (measured 450mm above the pitch line).</u>
2.5	1.5	After 'also and before 'a' (first line) Delete 'expect' replace with 'require'
2.5	1.5	After 'practical.' and before 'is' (second and third lines) Delete 'As with the Lifetime Home Standards, so too the Council will consider whether failure to comply with the Standard' replace with <u>'Where it is not possible or practical to comply with any one of the Standards, the Council will consider whether this'</u>
2.30	1.30	Delete after 'level' and before 'the' (first & second lines) 'served by a communal stairway.'
2.31	-	
2.31	1.31	After 'floor.' (second line) and before '.Sufficient' (eighth line) Delete 'Strict interpretation of the Lifetime Home Standards would fail the first floor flat on the basis that there would not

		<p>be an entrance level living room, toilet facility or convenient bed space. However with either the installation of an easy-going stairway, as set out above, or with sufficient space for future installation of a stair lift, the flat's first floor can be treated as effective entrance level and the flat is therefore capable of being a Lifetime Home.</p> <p>Replace with '<u>As noted at paragraph 1.4, such flats cannot be categorised as 'Lifetime Homes' because there would not be an entrance level living room, toilet facility or convenient bed space. However where there is sufficient space for the future installation of a stair lift, the Council will treat the first floor as the effective entrance level and will therefore apply the Lifetime Home Standards to the flat.</u>'</p>
2.63	1.63	<p>After 'by' (first line) and before 'stair' (second line)</p> <p>Delete 'a private rather than communal stairs so LHS 5 does not apply. The'</p> <p>Replace with '<u>the existing stairs, which are not 'easy going', so the flat cannot be categorised as a 'Lifetime Home. However the</u>'</p>
2.88	1.88	<p>Before 'the' (first line)</p> <p>Delete 'The flat would not be served by communal stairs or a lift and'</p> <p>Replace with '<u>As per example 1,</u>'</p>
2.88	1.88	<p>After 'therefore' and before 'the' (fourth line)</p> <p>Delete ', as per example 1'</p>

APPENDIX B – COMPARISON OF EXISTING LIFETIME HOME STANDARDS AND PROPOSED NEW STANDARDS AND PRINCIPLES

EXISTING LIFETIME HOME STANDARDS AND PROPOSED NEW STANDARDS & PRINCIPLES			
Criteria	Existing	Proposed	Principle
LHS 1	Where there is car parking adjacent to the home, it should be capable of enlargement to attain a width of 3.3m.	(a) where a dwelling has car parking within its individual plot (or title) boundary, at least one parking space length should be capable of enlargement to achieve a minimum width of 3300mm (b) where parking is provided by communal or shared bays, spaces with a width of 3300mm should be provided	Provide, or enable by cost effective adaptation, parking that makes getting into and out of the vehicle as convenient as possible for the widest range of people (including those with reduced mobility and/or those with children)
LHS 2	The distance from the car parking space to the home should be kept to a minimum and should be level or gently sloping.	The distance from the car parking space of criterion 1 to the dwelling entrance (or relevant block entrance or lift core) should be kept to a minimum and be level or gently sloping. The distance from visitors' parking to relevant entrances should be as short as practicable and be level or gently sloping	Enable convenient movement between the vehicle and dwelling for the widest range of people, including those with reduced mobility and/or those carrying children or shopping
LHS 3	The approach to all entrances should be level or gently sloping.	The approach to all entrances should preferably be level or gently sloping	Enable, as far as practicable, convenient, convenient movement along other approach routes to dwellings (in addition to the principle approach from a vehicle required by criterion 2) for the widest range of people
LHS 4	All entrances should be illuminated, have level access over the threshold and have a covered main entrance	All entrances should be illuminated, have level access over the threshold and have clear opening widths and nibs. In addition main entrances should have adequate weather protection and have a level external landing.	Enable ease of use of all entrances for the widest range of people
LHS 5	Communal stairs should provide easy access and, where homes are reached by a	(a) Principal access stairs should provide easy access in accordance with the	Enable access to dwellings above the entrance level to as many people as possible

	lift, the lift should be wheelchair accessible	specification below, regardless of whether or not a lift is provided (b) Where a dwelling is reached by a lift, it should be fully accessible	
LHS 6	The width of internal doorways and hallways should conform to Part M of the Building Regulations, except where the approach is not head-on and the corridor width is 900mm, where the clear opening width should be 900mm rather than 800mm. There should be 300mm to the side of the leading edge of the doors on the entrance level.	Movement in hallways and through doorways should be as convenient to the widest range of people, including those using mobility aids or wheelchairs, and those moving furniture or other objects. As a general principle, narrower hallways and landings will need wider doorways in their side walls.	Enable convenient movement in hallways and through doorways
LHS 7	There should be space for turning a wheelchair in dining areas and living rooms and adequate circulation space for wheelchair users elsewhere.	There should be space for turning a wheelchair in dining areas and living rooms and basic circulation space for wheelchair users elsewhere.	Enable convenient movement in rooms for as many people as possible
LHS 8	The living room should be at entrance level.	A living room/living space should be provided on the entrance level of every dwelling.	Provide accessible socialising space for visitors less able to use stairs
LHS 9	In houses of two or more storeys, there should be space on the ground floor that could be used as a convenient bed space.	In dwellings with two or more storeys, with no permanent bedroom on the entrance level, there should be space on the entrance level that could be used as a convenient temporary bed space.	Provide space for a member of the household to sleep on the entrance level if they are temporarily unable to use stairs (eg after a hip operation)
LHS 10	There should be a wheelchair accessible entrance level toilet with drainage provision enabling a shower to be fitted in the future.	Where an accessible bathroom, in accordance with criterion 14, is not provided on the entrance level of a dwelling, the entrance level should have an accessible w.c. compartment or cloakroom. There should be potential for a shower to be installed.	Provide an accessible w.c. and potential showering facilities for: (i) any member of the household using the temporary entrance level bed space of criterion 9, and; (ii) visitors who are unable to use the stairs
LHS 11	Walls in bathrooms and toilets should be capable of taking adaptations such as handrails.	Walls in bathrooms and w.c. compartments should be capable of firm fixing and support for adaptations such as	Ensure future provision of grab rails is possible, to assist with independent use of w.c. and bathroom facilities

		grab rails.	
LHS 12	The design should incorporate provision for a future stair-lift and a suitably identified space for a potential installation of a through-the-floor lift from the ground to the first floor, for example to a bedroom which is next to a bathroom.	The design within a dwelling of two or more storeys should incorporate both (a) potential for stairlift installation and (b) a suitable identified space for a through the floor lift from the entrance level to a storey containing a main bedroom and a bathroom satisfying criterion 14.	Enable access to storeys above the entrance level for the widest range of households
LHS 13	The design should provide for a reasonable route for a potential hoist from a main bedroom to the bathroom.	Structure above a main bedroom and bathroom ceiling should be capable of supporting ceiling hoists and the design should provide a reasonable route between this bedroom and the bathroom.	Assist with independent living by enabling convenient movement between bedroom and bathroom facilities for a wide range of people
LHS 14	The bathroom should be designed to incorporate ease of access to the bath, w.c. and wash basin.	An accessible bathroom should be provided in every dwelling on the same storey as a main bedroom.	Provide an accessible bathroom that has ease of access to facilities from the outset and potential for this access to be improved further, to suit individual needs, by simple adaptation
LHS 15	Living room window glazing should begin at 800mm or lower and windows should be easy to open/operate.	Windows in the principal living space (typically the living room) should allow people to see out when seated. In addition, at least one opening light in each habitable room should be approachable and usable by a wide range of people – including those with restricted movement and reach.	Enable people to have a reasonable line of sight from a seated position in the living room and to use at least one window for ventilation in each room
LHS 16	Switches, sockets, ventilation and service controls should be at a height useable by all (i.e. between 450mm and 1200mm from the floor).	Service controls should be within a height band of 450mm to 1200mm from the floor and at least 300mm away from any internal room corner.	Locate regularly used service controls, or those needed in an emergency, so that they are useable by a wide range of household members – including those with restricted movement and limited reach