

TABLE 1: CONSULTEES' COMMENTS AND RECOMMENDED RESPONSE

Consultee	Consultee Submission	Council's Response
Andrew Reed Kenneth W Reed Associates	3.1 – (National Policy) If this is an electronic document can we have automatic links to various websites / docs	Document will be downloadable in PDF format – so links would not work. The number of national policy documents referred to in the SPD has been reduced and these are readily available to view on the DCLG website: www.communities.gov.uk
	4.1 – (Policy Guidance) Mixed Use Development might need to be looked at separately. Addition of 'Maxi Developments (50 or More) 4.3 (Criteria) Omit this part to 4.6 as covered in the guidance	Consultation draft section 4 (paragraphs 4.1-4.6) deleted as part of document restructure – no longer need to explain major/minor and 'maxi' developments
	5 (Major Developments) What about reference to: CABE Building for Life Affordable Housing Toolkit Harrow Council SPD on Sustainable Design Manual for Streets Code for Sustainable Homes Harrow Core Strategy etc	The purpose of the SPD is to focus on locally specific guidance which does not duplicate or supersede that provided elsewhere. Other SPDs referred to in text. External documents are subject to change / revision, the guidance can become obsolete and so including reference to all of them in the SPD is not considered appropriate. Links to relevant guidance will be put on the Council's Residential Design SPD webpage.
	5.1 (Wider Context MD) This needs to interlink to Core Strategy and Harrow Town Centre Design and Intensification Area planning. 5.2 (Local Context) Harrow town centre doesn't have this (local context and character) Harrow town centre is ever changing (re. transport pattern) Very varied in Harrow town centre (re height and massing) Very difficult to judge in respect of offices (re function of area)	Area Action Plan for the Intensification Area cross referenced in text as this will provide the context for design in this area and may over-ride the SPD. Issues regarding Harrow town centre will be covered by the AAP as part of the Intensification Area. SPD amended to refer to local prevailing character.

	<p>Very difficult where the town centres have no homes or flats (re social setting) 5.4 Change might be good 5.5 Should be set by policy not developers 5.6 Not sure the Council is qualified to judge such schemes 5.7, 5.8, 5.9 Not necessarily a robust argument. Many fine buildings don't do this.</p>	<p>SPD amended to include some general advice for residential development to relate to its surroundings. SPD recognises value of high quality innovative design. SPD amended to provide general principles for design and layout of development. Harrow has access to professional design expertise provided by Design for London. SPD amended to provide general principles and amplification for all areas, which includes provision for innovative new designs.</p>
	<p>5.10 (Building Form) How is this assessed?</p>	<p>SPD amended to provide general principles and amplification for residential design; decisions on application proposals a matter for the local planning authority informed by consultation and with support from Design for London.</p>
	<p>5.12 (ecological) This section is too long and has too much emphasis. Far too detailed for design guidance.</p>	<p>Section retained as part of legitimate landscape and open space considerations; however detailed bullets will only apply to major development.</p>
	<p>5.14 (Sustainable Movement) This relates to 'Maxi' developments. 5.15 Secured by Design should have short section on its own. 5.17 Need separate section on contributions 5.19 Fine as sub section tick list but not in major section of design.</p>	<p>Section retained as part of making the connections considerations for all relevant developments. SPD focuses on Harrow specific guidance and not to replicate other guidance (some cross references retained in text). The SPD is not intended to be a S 106 document. Cycle parking section retained and incorporated as part of making the connections considerations.</p>
	<p>5.21 (Entrances) Major Development? (Re front porch design and location) 5.23 Need separate short section as checklist Detailed design not relevant here. 5.25 (Boundaries) Too detailed</p>	<p>SPD amended to provide general advice on entrances as part of detailing the place considerations. Detailed bullets on entrances omitted (relevant matters dealt with in Accessible Homes SPD) SPD amended to provide general advice on boundary treatment as part of detailing the place considerations.</p>

<p>5.26 (Building Size) “May be preferable” – says who – the developer? Building size and scale needs to be controlled by having proper town centre local centre policies. Probably the most important restriction / guidance needed by the SPD</p>	<p>SPD amended to provide general advice on scale, massing and roof form; and further amplification in relation to town centres and suburbs.</p>
<p>5.27 (privacy) How Quantified? How Assessed? Cheating techniques! 5.28 – like what? (other) 5.29 – let out (re Unavoidable) Need to revert to scientific analysis.</p>	<p>SPD amended to provide clearer guidance on privacy.</p>
<p>5.30(Access to daylight) Naïve. Need scientific analysis by competent consultants / BRE consultation etc 5.32 Unlike Dandara, needs to be more learned. How Demonstrated (overshadowing) 5.33 Major developments should have this as a matter of course</p>	<p>SPD amended to provide clearer guidance on privacy and to clarify continued application of 45 degree code. Use of specialist techniques likely to be unduly onerous and unnecessary for most development; existing 45 degree code more widely understood. SPD would not preclude use of other methods for major/tall development on a case by case basis.</p>
<p>5.34 (Amenity Space) London Plan is specific about how amenity space is calculated – why duplicate?</p>	<p>SPD amended to cross refer (but not duplicate) emerging London Plan standards</p>
<p>5.41 (Parking) This is a big issue and not addressed sufficiently 5.43 Too detailed</p>	<p>SPD amended to set out car parking as part of making the connections considerations, and clarifies position regarding disabled persons’ parking.</p>
<p>5.46 Not necessary to say 5.47 Repeated. Does not Council already have policies in place.</p>	<p>SPD amended to provide more concise guidance refuse arrangements for multi-storey development. SPD amended to cross-refer existing Code of Practice.</p>
<p>5.52 (internal Space) Irrelevant statement 5.54 Unnecessary 5.56 Also allows washing, bikes chairs and other undesirables. 5.58 Irrelevant 5.60 Not necessary to say. 5.61 Not necessary to say. It is subjective. Doesn’t help</p>	<p>SPD amended to more closely address UDP policy matters; cross reference to emerging London Plan standards. SPD amended to reflect need for drying/storage space, and to encourage use of solid enclosures to screen balcony clutter. SPD retains but re-words sections on architecture, materials, fenestration and services as part of site and setting</p>

	<p>one to design a better building. 5.62 (Windows) How is this assessed 5.63 Not necessary 5.64 Irrelevant / subjective 5.65 (Flues) Just needs a minor section in a checklist form – not a complete design guide in itself</p>	<p>considerations. SPD retains but rewords section on roof form and edges.</p>
	<p>6.1 (Minor Development) The only high quality areas are in Conservation Areas. The rest is pretty grim. 6.6 What about where whole areas can be upgraded / allowing a catalyst of good but different architecture 6.19 Far too long and unnecessary. Could be covered as checklist.</p>	<p>Disagree. This is already recognised in the Harrow & Wealdstone Intensification Area designation; AAP will provide policy context for this area. Section retained as part of legitimate amenity and creating the urban structure considerations and simplified.</p>
	<p>6.21 Irrelevant / unnecessary. Subjective and obvious. 6.22 Not necessary in minor developments 6.28 (Context) The rest just repeats previous wordage. Same comments apply.</p>	<p>Deleted from revised SPD. Section retained for all relevant developments. SPD structure substantially revised to avoid repetitive text.</p>
	<p>7.2 (Conversions) Much has already been eroded and ruined 7.5 market conditions probably suggest otherwise.</p>	<p>SPD seeks to improve future conversion schemes. 7.5 relates to balconies and external steps (overlooking from) – retained in revised SPD.</p>
	<p>8.3 (Extensions - Need for permission) May change. 8.5 Same care and attention just better and more appropriate design 8.6 Need more advice 8.7 (Harmony) Advice given for semi-detached should be considered in more detail, too prescriptive.</p>	<p>SPD wording on need for planning permission amended SPD wording on conservation areas and listed buildings amended SPD wording on Green Belt amended to clarify; however not within the scope of the SPD to amplify Green Belt policies Disagree: advice on harmony for semi-detached dwellings the basis for subsequent detailed requirements.</p>
	<p>8.19 (Roofs) Tiles cannot go on pitches less than 35 degrees. Flats 22.5 degrees. Crown roofs are dreadful. Flat roofs and parapets all round are generally ok. Insets / offsets recommended. 8.23 Infilling garage doors? Not all plots are simple. 8.36 Very simplistic</p>	<p>Noted, but specification of pitch too detailed/prescriptive for SPD. Crown roofs unavoidable in some cases, but visual impact of these can be considered on merit. SPD does not preclude flat roof on single storey. Where control available garage door infilling can be considered on merit. SPD retains 45 degree code as established practice that is</p>

	8.39 Legal issues not relevant here	well understood and addresses various aspects of amenity and character. Content on encroachment is advisory and retained to inform planning of domestic development.
Campaign for a Better Harrow Environment	Appendix A. The standards in Appendix A should be adopted for all new dwellings, conversions and extensions, especially as it is not certain that they will be in the final London Plan. Also a standard is needed for one-person one-bedroom and studio flats. Maybe 45 sqm would be appropriate.	SPD amended to cross refer to the London Plan (but not applicable to extensions). No evidence to support formulation of a local standard; individual proposals for studios can be considered on their own merits.
	Sound insulation This does not appear to be mentioned but higher standards are needed. Even in new buildings, such as Bridge Court in South Harrow, the sound-proofing between flats is inadequate. The problem is greater for conversions unless a high level of insulation is made between floors.	Beyond the scope of the SPD to increase technical requirements of the Building Regulations; however amended SPD sets out guidelines for stacking/room arrangements to help minimise noise transfer from conflicting activities.
	Effect of the SPD on the Environment In 2.12, page 9, it is stated that it will not be necessary to conduct a Strategic Environmental Assessment because the SPD will not have any significant effect on the environment. Presumably it is felt that any beneficial effects will be cancelled out by the harmful ones. We would have hoped for more measures to increase sustainability and benefit the environment. Please see the notes at the end of this response.	The need for SEA is based on an assessment prescribed by strategic environmental assessment regulations and is subject to confirmation from the statutory bodies who in Harrow's case agreed there would be no significant adverse effects. Measures specific to sustainability are included in the Council's existing Sustainable Building Design SPD.
	Major Development Building size and scale A specified height limit is needed. In the draft London Plan (chapter 3 page 68) the suggested heights of buildings in a Metropolitan Centre are 4-6 storeys. Therefore, in 5.26, after "taller development" replace	SPD amended to cross reference existing UDP provisions on tall buildings and identified views, as part of context, scale and character considerations. Beyond the scope of the SPD to set a maximum height.

<p>"may be preferable" by "up to 6 storeys maximum could be considered".</p> <p>Views as well as streetscape are relevant. Add to end of 5.26 "and on both near and long views".</p> <p>Access to daylight, sunlight and adequate ventilation Add to 5.32 the bullet point: "Single aspect north or north-east facing flats would not be acceptable."</p> <p>Amenity space "wherever possible" at the end of 5.34 is too vague. It should be deleted and a sentence added such as "Exceptionally reduced outdoor amenity space may be permitted subject to 5.37." The box in 5.40 looks quite generous (50 sqm for up to 5 units plus 5 sqm per additional unit), but please clarify that this refers to OUTDOOR PRIVATE AMENITY SPACE FOR THE USE OF ALL RESIDENTS.</p> <p>Parking 5.44 does not say what the maximum standards are. To avoid inconvenience to other local residents there should be a minimum of one off-road parking space per dwelling. It is unrealistic to expect new residents not to own cars.</p> <p>Large developments should provide for car share schemes with designated parking places on site.</p> <p>Safety and security Could you add that walking routes should be designed to avoid blind corners and that cycling routes within a site should be separated from pedestrians and from cars.</p>	<p>As above.</p> <p>SPD amended to clarify that dual aspect preferable where possible (but also recognises that may be unavoidable in high density development).</p> <p>SPD amended to confirm rigorous application of London Plan standards to new development in Harrow. Reproduction of draft replacement London Plan standards omitted from the SPD.</p> <p>SPD amended to set out car parking considerations, and clarifies position regarding disabled persons' parking. Cross reference to London Plan and UDP for maximum parking standards.</p> <p>Beyond the scope of the SPD (would need a DPD policy).</p> <p>Too specific. SPD amended to include cycling and pedestrian considerations.</p>
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	<p>In 5.50 after "street lighting" add ", with shades to prevent light pollution,"</p> <p>Minimum space standards As above. Please add a minimum gross internal floor area for one-person dwellings to Appendix A.</p>	<p>SPD amended to include reference to shades on street lighting.</p> <p>No evidence to support formulation of a local standard; individual proposals for studios can be considered on their own merits.</p>
	<p>Sustainable Development to be incorporated into the SPD</p> <ol style="list-style-type: none"> 1. Homes which are Built to Last Energy is likely to become much more expensive in the future and continued economic growth may not be possible. If buildings become unfit for purpose after only a few decades the next generation may not be able to afford to demolish and replace them. Far too many "slums of the future" have been built in recent times. It is therefore strongly recommended that new residential buildings be designed and constructed to last for many generations. The buildings should be flexible enough to be adaptable for different types of occupiers and capable of being updated as technology improves. 2. Improving The Existing Housing Stock The draft SPD is concerned with new developments. However there is a much bigger task than building 2,500 new homes, that is bringing the Borough's existing housing stock up to modern standards. At the moment the price of energy is not high enough to make investment in solar panels, wall insulation, heat pumps etc attractive to property owners. If energy becomes much more expensive, or has to be rationed, this will change. There is potentially employment for many local 	<p>Measures specific to sustainability are included in the Council's existing Sustainable Building Design SPD.</p> <p>Limited planning control over retrofitting of existing buildings; nevertheless measures specific to sustainability are included in the Council's existing Sustainable Building Design SPD.</p>

	<p>people in carrying out this work. Training of operators and managers, quality control, maintenance etc would have to be addressed. We hope that the council has this issue in mind.</p> <p>3. The Need for Good Quality Family Homes An article by Yolande Barnes, Head of Residential Research at Savills, in The Times of 16th Oct. 2010 argues persuasively that people will be forced to live in <i>rented</i> accommodation for many years while they save a deposit and, in some cases, pay off student debt. There will be a need for “long term lets in family houses, something which scarcely exists”.</p> <p>She makes the point about Britain needing to retain and grow talent to remain competitive in world markets.</p> <p>CBHE argues that the same applies to Harrow. If suitable long term rented family housing is available, together with local employment people need not waste many hours per week on commuting. Other worthy aims would also be achieved such as less overcrowding on the roads and public transport and reduction of carbon dioxide emissions.</p>	<p>Matters beyond the scope of the SPD (would need DPD policies if justified by local evidence).</p>
Coal Authority	<p>Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.</p>	Noted.

<p>Bernard Wainwright Hatch End Association</p>	<p>I am responding on behalf of the Hatch End Association to the consultation on the Draft Residential Design Guide SDP. We broadly welcome the approach and principles set out. We welcome in particular the encouragement offered to innovative design and use of materials; the presumption against new "gated" developments; and the emphasis on important points of detail (e.g., avoidance of "stacking").</p> <p>However, we are concerned about the absence of reference to front gardens (apart from a passing mention in the chapter on conversions). We would like to see stress laid on the need (and policy) for avoidance of excessive hard standing. If there are such references in, perhaps, the 'saved' UDP Policy D9 on streetside greenness, a cross-reference would be welcome (at least in discussing minor developments).</p> <p>We are also concerned about the absence of reference (in Chapter 5), when considering size and scale of large developments, to the need to protect important visual prospects towards the green belt and Harrow on the Hill. This may well be covered elsewhere in the LDF or in other SDP's, but it would bear repetition here.</p> <p>A list of more detailed points is set out below under the draft's paragraph numbers; this is an unsorted mix of comments, queries, and typing or transcription errors, of varying significance.</p>	<p>Support noted.</p> <p>SPD amended to include reference to forecourt treatment as part of creating the urban structure considerations.</p> <p>SPD amended to cross reference existing UDP provisions on identified views. Further reference to role of topography in creating vistas, views and glimpses as part of space around the building considerations.</p> <p>Noted</p>
	<p>5.26 Size and scale. The final sentence is rather nebulous; there ought to be an undertaking for real consultation about significant departures from prevailing height and scale. Among the "likely effects" which should also be considered, where relevant, are any threats to sight lines towards the green belt (especially the Harrow Weald Ridge) and Harrow on</p>	<p>SPD amended to cross reference existing UDP provisions on tall buildings and identified views.</p> <p>SPD amended with new text on privacy and overlooking</p>

	<p>the Hill (St Mary's church).</p> <p>5.29 The final point about privacy & over-looking: some exposition would help on how benefits to the community and costs to overlooked properties are measured or assessed.</p>	<p>(5.29 deleted).</p>
	<p>5.35 Last line: push-chairs or buggies is probably a more common term these days than "prams". And won't major developments normally have lifts?</p> <p>5.52 The final sentence could do with some fuller exposition.</p> <p>5.59 Welcome encouragement of innovative use of materials, and elsewhere of innovative design; would be good to see it in practice, with some publicity given to approved examples.</p> <p>5.64 Second line, separate "zonesmeet" into two words.</p>	<p>SPD amended – reference to prams omitted. Requirements for lifts dealt with in Accessible Homes SPD.</p> <p>SPD amended to more closely address UDP policy matters; cross reference to emerging London Plan standards.</p> <p>Text amended but support for innovative new design retained. Final SPD may include photographic examples.</p> <p>Text amended as suggested.</p>
	<p>6.11-6.18 No comment on building lines, etc., but should there not be some similar discussion of building lines, etc. in Chapter 5 on Major Developments?</p> <p>6.27 Penultimate line: "Innovative" should have lower case "i".</p> <p>6.30 Second and fifth sub-paragraphs. In what way do lounges, sitting and dining rooms require less privacy than other habitable rooms? Presumably no-one's undressing? And is there not some contradiction between the first sentence of the second and fifth sub-paras? While it may be useful to have "passive surveillance of the street", is it really a role of habitable rooms "to enliven the street scene"?</p>	<p>SPD amended – building lines now part of general principles applicable to all development covered by the document.</p> <p>Text amended as suggested.</p> <p>SPD amended including revised text on privacy/overlooking.</p>

	<p>7.7 The ambition of this paragraph reflects a considerable improvement on the actual situation on the ground in many conversions.</p> <p>7.13 In first line, substitute "must" for "should" - a stronger term emphasises the legislative requirement.</p>	<p>SPD amended including revised text on parking and layout treatment of forecourts.</p> <p>Text amended as suggested.</p>
	<p>8.32 Third line: "13m2" should read "13 sq.m."</p> <p>8.40 Last line: Presumably the phrase "and that work..." should start on a fresh line, as in the original textual lay-out (in the Householder's Guide to Extensions) from which it was copied.</p> <p>8.67 The last sentence (in which the word "cable" should be "gable") is new, and may pick up a point previously made elsewhere. It is not entirely clear, and may not be fully consistent with other references in the Guide.</p> <p>8.72 Third line: "Section 3" is copied from the current document guide on extensions, and should read "paragraphs 8.26 to 8.30".</p> <p>8.86-8.87 A useful exposition and reminder of existing rules.</p>	<p>Text amended as suggested.</p> <p>Text restored to original layout as suggested.</p> <p>Text corrected as suggested.</p> <p>Cross reference deleted (unnecessary).</p> <p>Noted. SPD text amended for improved readability/clarity.</p>
<p>Roxborough Road Residents Association</p>	<p>General comments</p> <p>We welcome the fact that this SPD on residential design applies the same standards to all types of housing whether private or rented, new or converted older properties. However we are concerned that the</p>	<p>SPD amended to include general principles applicable to all development covered by the document.</p>

	<p>guidance on major developments is more loosely written than that for smaller projects, apparently offering wider flexibility concerning such aspects as density, height and recognition of local context. In the past such lack of clarity has led to costly appeals and loss of planning control, for example in the case of Aspect Gate and Neptune Point. In its present form we believe that it would provide too weak a basis for rejecting some inappropriate projects.</p>	
	<p>Major development</p> <p><u>Local context and character</u> The SPD gives guidance on the setting of large developments within the existing environment. It points out that account should be taken of local character but the extent of this depends, among other things, on 'the existence of desirable building design in the surrounding area' (5.4). Furthermore it states that in some urban locations the design of large buildings may 'depart from the established surrounding context in order to establish a distinct, new, local character' (5.5). This guidance is further reiterated specifically for Harrow town centre (5.26).</p> <p>The original character of central Harrow has suffered from the addition of a hotchpotch of indifferent buildings, often significantly taller than their surroundings, in recent years. There are 'desirable' design elements still there but they tend to be overwhelmed by buildings whose impact is derived from their height/mass rather than architectural merit. We therefore feel that desirable local context should not be dismissed just because it is in the minority and that the SPD should direct future planning applications for large developments to take account of this.</p>	<p>Noted</p> <p>Area Action Plan for the Intensification Area cross referenced in text as this will provide the context for design in this area, including recognition of existing desirable characteristics, and may over-ride the SPD.</p>

	<p><u>Building size and scale</u> Also in paragraph 5.26, Harrow town centre is singled out as a place where ‘a departure from prevailing patterns of building height, massing and scale, in favour of denser and taller development may be preferable’. This statement seems to be accepting that tall buildings are the only means of increasing residential density. It is not. The draft London plan states that tall buildings should only be considered as one of several options when designing for higher density. Furthermore at the Examination in Public, the Mayor’s representative reinforced this view saying that an extra paragraph would be inserted in the London Plan to make it clear that other, low rise ways of increasing housing density existed. The draft London Plan encourages local authorities to characterise their areas as part of the LDF. Guidance on height limits in central Harrow would be a useful addition, either in this SPD or in the core strategy. The draft London Plan suggests 4 to 6 storeys for central locations.</p> <p>We consider that paragraphs 5.5 and 5.26 are an open invitation to developers to ignore existing local character in or immediately surrounding Harrow town centre and build ever higher blocks of flats. Considering Harrow Council’s recent planning history, developers need no such invitation. These 2 paragraphs should be removed or replaced by encouragement to developers to offer low rise design solutions.</p>	<p>SPD amended to cross reference existing UDP provisions on tall buildings as part of creating the urban structure considerations. Beyond the scope of the SPD to set a maximum height. Area Action Plan for the Intensification Area may set policies on height, if justified, applicable to central Harrow.</p> <p>SPD amended to include general principles applicable to all development covered by the document. However, as noted above, policies specific to the central area may be development as part of the Area Action Plan for the Intensification Area.</p>
	<p><u>Privacy and outlook</u> In section 5.27, guidance is given regarding preservation of privacy and outlook for properties adjacent to large developments. However this only applies to ‘habitable rooms’, which includes only living rooms and bedrooms. Furthermore, paragraph 5.29</p>	<p>SPD amended including revised text on privacy/overlooking (5.29 deleted) and clarification that consideration also be given to kitchen windows.</p>

	<p>appears to threaten even this basic level of protection if the economic and other benefits of multi-storey developments outweigh the detrimental effect on neighbouring properties.</p> <p>In many households the kitchen is the most used room in the dwelling and its natural light and outlook should be protected from overshadowing as much as living rooms and bedrooms. This is apparently recognised when dealing with the same issue for extensions; both habitable rooms and kitchens are mentioned (paragraphs 8.27, 8.31, 8.32). Indeed the guidance regarding overshadowing for extensions is far more detailed overall than that for major developments when intuitively it should be the other way round.</p> <p>This is another example of an apparent relaxation of the standards being required of those planning large developments and this inconsistency should be addressed</p>	<p>SPD amended to incorporate equivalent guidelines for new development as extensions (45 degree code and protection of windows to kitchens over 13 sq. metres).</p> <p>SPD amended to address this – see above.</p>
	<p><u>Ecological considerations</u></p> <p>We welcome the guidance in paragraph 5.12 for inclusion of design features which will provide habitats for local wildlife and so hopefully counter the decrease in biodiversity</p>	<p>Support noted (but will apply to large developments only).</p>
	<p><u>Amenity space</u></p> <p>We agree with the expectation that large developments should offer outside amenity space for its occupants and consider that this should be a requirement in all but exceptional circumstances. The suggestion in paragraph 5.37 of an indoor enclosed space is a very inferior alternative and should not be proposed so freely.</p>	<p>SPD amended to clarify the considerations relating to provision of alternatives to outdoor amenity space.</p>

	<p><u>Internal space</u> We welcome the inclusion of minimum space standards for new homes. However the table in Appendix A does not cover all types of dwellings. One person/one bedroom flats and studio flats are not included. It is important that they are, because the smallest flats are often the least well designed and yet they tend to be preferred by developers as they maximise profit. We urge the Council to include these smaller units even if the London Plan does not.</p> <p>The additional standards for internal layout listed in paragraph 5.54 appear sensible and in no way excessive. We consider that developers should be required to adhere to these standards rather than merely be encouraged to comply.</p>	<p>No evidence to support formulation of a local standard; individual proposals for studios can be considered on their own merits.</p> <p>SPD amended; internal layout matters dealt with as part of amenity of future occupiers consideration. Accessible Homes SPD provides further detailed specification on internal matters. SPDs a material consideration in determination of applications.</p>
	<p><u>Edges</u> We welcome the recognition that the interface between large new developments and existing residential neighbourhoods or open spaces are often problematic (paragraph 5.64). We hope that the requirement, that these areas should be dealt with sensitively, will be rigorously enforced. However paragraph 5.29 appears to seriously undermine the Council's intention, by admitting that the effects of overshadowing etc. may be ignored if other benefits of the development are considered more important. This paragraph should be removed</p>	<p>Amended SPD retains and expands upon guidance on edges.</p> <p>SPD amended including revised text on privacy/overlooking (5.29 deleted).</p>
	<p><u>Minor developments</u></p> <p>Some of our comments on major developments are also applicable to minor developments:</p> <p>We are concerned about the exclusion of kitchens when considering protection from overshadowing by new builds and access to daylight with in the new build</p>	<p>Noted.</p> <p>SPD amended to incorporate equivalent guidelines for new development as extensions (45 degree code and protection of windows to kitchens over 13 sq. metres).</p>

	<p>(paragraph 6.38, 6.41). We also feel that enclosed internal amenity space is a very poor alternative to outdoor space for minor projects and should not be encouraged (paragraph 6.46).</p> <p>Minimum space standards should be added to Appendix A for one person/one bedroom flats in minor as well as major developments and the additional layout standards listed in paragraph 6.63 should be adopted as requirements.</p>	<p>SPD amended to clarify the considerations relating to provision of alternatives to outdoor amenity space (but no distinction for major vs. major development).</p> <p>No evidence to support formulation of a local standard; individual proposals for studios can be considered on their own merits.</p> <p>SPD amended; internal layout matters dealt with as part of amenity of future occupiers consideration. Accessible Homes SPD provides further detailed specification on internal matters. SPDs a material consideration in determination of applications.</p>
	<p>Conversions</p> <p>We feel that the additional flexibility regarding minimum space standards afforded to conversions is unnecessary. These standards are not generous and will encourage unscrupulous developers (paragraph 7.11).</p> <p>We welcome the guidance in paragraphs 7.14 and 7.15 on the inclusion of loft space in conversions which seeks to curb their use as cramped single dwellings.</p> <p>Although an already adopted SPD on sustainable building design is referred to in this SPD it is not clear whether upgrading of existing dwellings during conversion or extension will be required. This would be particularly relevant to sound insulation in conversion of houses into flats but also presents an opportunity to improve the energy usage of the existing housing stock.</p> <p>In summary, our main criticism of this SPD is that, in its</p>	<p>SPD clarified – starting point is for conversions to comply, but flexibility still needed to reflect the constraints of working within existing building fabric.</p> <p>Noted</p> <p>Sound insulation a matter for Building Regulations. Beyond the scope of the SPD to seek retrofitting of existing dwellings as part of extension proposals.</p> <p>SPD amended to include general principles applicable to all</p>

	<p>present form the standards applied to major developments seem to be substantially less rigorous than those applied to smaller projects and we fear that this will not prevent large and well funded developers from building inappropriate projects in Harrow, further degrading its environment.</p>	<p>development covered by the document. However, as noted above, policies specific to the central area may be development as part of the Area Action Plan for the Intensification Area.</p>
<p>Mrs D James</p>	<p>Having read the document, I support all that is being forward, especially the urgent need to protect our wildlife habitat, and this must be a crucial consideration with all new developments.</p> <p>I understand the need to provide homes for people, but in many instances by allowing these developments, you are actively destroying the homes of our wildlife.</p> <p>Secondly, for some years, I have been extremely concerned about the vast number of huge extensions that have been built onto relatively small houses. I have looked at the planning applications for some of the local ones to me, and have been aware that they have not been built according to those agreed plans. And yet nothing is done to remedy this.</p> <p>So many brick outbuildings have appeared, described as a storage building or an extra living room. In some cases, people are living in these bungalows.</p> <p>It appears that once the planning application for these extensions and outbuildings has been passed, the use and interior design changes. Small two bedroom houses, often have six or more people living in them, this can't be acceptable.</p> <p>Whilst I support wholeheartedly the Draft Residential Design Guide, I am concerned that the Council's</p>	<p>Support noted.</p> <p>Many extensions and outbuildings in Harrow are 'permitted development' not requiring planning permission – these are beyond the scope of the SPD. The Council will investigate all planning enforcement complaints made about unauthorised development.</p> <p>As above. Occupation levels covered by changes to Use Classes Order re: houses in multiple occupation – beyond the scope of the SPD.</p> <p>Implementation of the SPD can be contained within existing resource provision as part of the development management</p>

	planning department, which appears to be already overstretched, doesn't have the manpower or resources to implement these further regulations. I sincerely hope I am wrong.	process.
Harrow Friends of the Earth	<ol style="list-style-type: none"> 1. We are pleased with the way in which the document addresses biodiversity issues and stresses the importance of the Council's Biodiversity Action Plan. 2. We welcome the emphasis given to sustainable movement networks and the presumption against gated developments. It would be useful to include provision for 'car club' facilities in the requirements for major residential developments. 3. We are also pleased that energy efficiency considerations, including use of passive solar energy, are given due prominence in the document. 4. However, although Government planning policy statements on climate change and renewable energy are referred to in the preamble, there is little else of substance in the document to indicate that the Council is giving serious regard to them in its design guidelines for residential development. 5. In particular, the document fails to address paragraph 10 of the Climate Change supplement to PPS1 and paragraph 18 of PPS22. We believe that, wherever practicable, all new residential developments should incorporate 	<p>Noted</p> <p>Noted</p> <p>Car clubs beyond the scope of an SPD, this may be dealt with in the Development Management DPD.</p> <p>SPD amended to avoid duplication of issues already addressed in the Sustainable Building Design SPD.</p> <p>SPD amended to rationalise references to other documents and policies. As above, issues of climate change and renewable energy already addressed in the Sustainable Building Design SPD.</p> <p>Issues of microgeneration already addressed in the Sustainable Building Design SPD.</p>

	<p>microgeneration facilities in their design.</p> <p>6. We are also very disappointed that no reference is made at all to the Council's Climate Change Strategy and the stress it gives to the need to reduce emissions from the domestic housing sector.</p>	Retrofitting of existing housing beyond the scope of this SPD. Climate change measures for new development dealt with in the Sustainable Building Design SPD.
Environment Agency	<p>2.5 We are pleased that resource efficiency and environmental performance are included as objectives of the SPD. A bullet should be added to state: "River corridors should be fully integrated into site design to ensure that opportunities to enhance habitats and recreation are taken</p>	SPD amended to rationalise purpose/aims. River corridors beyond the general scope of the SPD (but does not preclude consideration in relevant schemes).
	<p>3.2 Planning Policy Statement 9- <i>Biodiversity and Geological Conservation</i> (PPS9) and Planning Policy Statement 25- <i>Development and Flood Risk</i> (PPS25) should be included here.</p> <p>3.3 Enhancing biodiversity and geological conservation (PPS9) Reducing flood risk (PPS25) The above changes in the Policy Background section are necessary to ensure that biodiversity and flood risk are taken into account when designing new developments. PPS9 must be referenced here to ensure that new development does not damage the biodiversity of the site and were possible leads to an improvement. In accordance with PPS25 new developments should</p>	<p>SPD amended to rationalise purpose/aims. River corridors beyond the scope of the SPD.</p> <p>As above.</p> <p>As above.</p>

	be designed to minimise flood risk.	
	<p>4.4 Flood risk should be mentioned in this section as it is vital that new developments are designed to minimise flood risk through use of Sustainable Drainage Systems (SuDS), the sequential approach, provision of safe access and egress etc. which have a wider context than just the development site. Biodiversity should be mentioned here as it is important any enhancements on site link up with other areas to create green corridors.</p>	Beyond the scope of the SPD. The Sustainable Building Design SPD addresses SUDS and further amplification in Harrow's SFRA.
	<p><u>5 Major Development</u> 5.12 We are happy with the ecological considerations and support this section. It is good that green roofs are mentioned here however, the section could be improved by making the following changes <i>Encouraging the incorporation of green roofs, green walls, balancing ponds, swale and other features that would improve biodiversity;</i> We are pleased that wildlife corridors have been mentioned here.</p>	<p>Noted Text amended as suggested. Noted</p>
	<p>5.20- 5.28 A section needs to be added here covering the importance of using SuDS and the sequential approach (putting the more vulnerable land uses in the areas at the lowest risk of flooding). This is in accordance with PPS25. The Sustainable Drainage Systems (SuDS) hierarchy should be mentioned in this section. New developments must be designed to maximise the use of SuDS. This will allow new development to prevent, and where possible reduce flood risk. The use of SuDS</p>	<p>Beyond the scope of the SPD. The Sustainable Building Design SPD addresses SUDS and further amplification in Harrow's SFRA Beyond the scope of the SPD; would need to be addressed as new policy in a DPD.</p>

	<p>can also have other benefits including habitat creation, improved surface water quality and recharging ground water. This reflects the policies in PPS25 and The London Plan.</p>	
	<p>5.40 A bullet point should be added stating that amenity spaces should be designed to conserve and enhance biodiversity.</p> <p>5.54 A built point should be added relating to water efficiency. This reflects the both the current London Plan Policy 4A.16 and draft replacement London Plan Policy 5.15, which require residential development to meet water consumption targets of 105 litres/head/day (l/h/d). Although the SPD should not repeat a London Plan policy it would be prudent to mention water efficiency as it is an important design consideration.</p>	<p>Text amended to reflect potential of space around buildings as an ecological resource, part of Space Around the Building considerations.</p> <p>Beyond the scope of the SPD. The Sustainable Building Design SPD deals with water consumption reduction and grey water recycling.</p>
	<p><u>6 Minor Development</u> <u>Ecological Considerations</u></p> <p>6.19 We are happy with the ecological considerations however, the section could be improved by making the following changes: <i>Encouraging the incorporation of green roofs, green walls, balancing ponds, swale and other features that would improve biodiversity;</i></p> <p>5.50 A bullet point should be added stating that amenity spaces should be designed to conserve and enhance biodiversity.</p> <p>Built form A section should be added relating to water efficiency (see our comments on 5.54). The Sustainable Drainage Systems (SuDS) hierarchy should be mentioned in this section (see our comments</p>	<p>SPD amended to apply detailed ecological design guidance to all development.</p> <p>Text amended to reflect potential of space around buildings as an ecological resource, part of creating the urban structure.</p> <p>Beyond the scope of the SPD. The Sustainable Building Design SPD deals with water consumption reduction and grey water recycling.</p>

	on 5.20- 5.28).	
Ministry of Defence	Harrow Council should continue to consult Defence Estates Safeguarding on planning applications that fall within the statutory height safeguarding zones surrounding RAF Northolt and the Meteorological Office at Chenies to ensure that any development does not affect MOD operational requirements. Please note that this only applies to developments that infringe the statutory safeguarding height criteria.	Noted.
Theatres Trust	No comment to make as not relevant to Trust's work	Noted
Andrew Evans The Harrow Hill Trust	<p>I would first note that, not as a Harrow resident, but in my professional capacity as a Professor of Economics at the University of Reading with a specialist interest in the economics of land and of land use planning, I was involved three or four years ago in discussions organized by CABE regarding proposals to set out design guidance.</p> <p>At the time of these discussions the reasons for proposing such guidance were quite clear. Because of the rising price of land and the political insistence (see the Rogers Report of 1999 followed by PPG3 in 2000) that densities as high as possible should be achieved on urban sites, new housing in England was becoming smaller and less desirable. Since new homes in</p>	<p>Noted</p> <p>Noted</p>

	<p>England were smaller than in any other country in western Europe even in 1996, further deterioration in quality needed to be avoided by setting out design standards.</p> <p>A design guide needs, however, to be effective when economic and political forces militate in favour of the construction of poor quality housing. After all, by building high density poor quality housing the builder could make a bigger profit and by permitting it to be built the local authority could achieve its targets with the least political cost.</p> <p>A model of an effective design guide is the London Housing Design Guide, the interim version of which was published in August. And I am afraid to say that the draft Residential Design Guide for Harrow is an example of an ineffective guide.</p> <p>To show why it is ineffective we can cite the positions of the two guides on sunlight. The Harrow guide, in section 5.31 states that good lighting can be achieved through providing “sufficiently glazed areas and appropriately siting windows to maximize solar access”.</p> <p>Now any architect or developer would claim that they were doing this and that to claim otherwise would be an insult to their integrity and professional status. And how is L.B. Harrow going to demonstrate that an applicant is not “appropriately siting windows” or not providing “sufficiently glazed areas”? It cannot.</p> <p>On the other hand the London housing Design Guide is quite specific. Section 5.5.1 states that “Glazing to all habitable rooms should not be less than 20% of the internal floor area of the room”. And goes on to expand</p>	<p>Noted</p> <p>SPD amended to give clearer and more focused guidance in relation to design/layout of residential development, and to more closely reflect the UDP policies that it seeks to supplement. However SPDs cannot be unduly prescriptive – only guidance. The SPD does not preclude application of the London Housing Design Guide where relevant. SPD text amended.</p> <p>Noted.</p> <p>As above.</p>
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	<p>on this with respect to single aspect dwellings et.</p> <p>Thus the Harrow Residential Design Guide is of little use because it is so vague.</p> <p>It is even less use if the authority uses as a justification for permitting a development which would appear contrary to the guide that it, the authority, had approved a similar development a few years ago and so it would not be right to refuse the later application. Such an attitude fails to recognise that the intention of publishing such a guide is precisely to ensure that what has been permitted in the past is not permitted in the future. By leaving its guidance unspecific the L.B Harrow is open to the argument that it accepted something before so that this constitutes a precedent for accepting the same thing now. The guidance in the London Design Guide, because it is specific, cannot be set aside in this way.</p> <p>I am sorry that I have had to be so negative, but drawing up guidance which is not specific is a waste of everyone's time. It is as though a person who was lost asked you the way to a location. You could either wave your hand in its general direction and say that it's over there, or you could give explicit guidance as to route which should be taken giving the names of streets and saying which turnings to take. In the second case the correct route is clear. In the first case it is not clear, and whether the applicant for guidance is going in the right direction is equally unclear.</p>	<p>Noted.</p> <p>SPD will be a new material consideration in the determination of relevant planning applications for residential development, so previous schemes may not set precedents.</p> <p>SPD amended to provide greater clarity of advice insofar as is possible in a guidance document.</p>
Dandara	It is stated that 'the Council needs ensure that future residential development is of an exemplary design	SPD amended to seek a high standard of design and layout, consistent with the UDP policies which it supplements.

	<p>quality'. Whilst it is agreed that new residential development needs to be of a high quality design requiring it to go beyond this appears to be excessive, particularly when the SPD relates to all residential developments including minor works and extensions.</p> <p>It is also stated that 'there has also been concern expressed through consultation with residents'. However, consultation should not be limited to residents and the views of others such as developers, land owners and other stakeholders is of equal importance if Harrow is to achieve it's goals of being a prosperous and desirable place to live. This has been a point made in previous representations to LDF documents and reference should be made at this point to consultation with other such stakeholders and not just be limited to residents.</p>	<p>Noted, though point is that these are residents' concerns. SPD amendments have been made in response to comments from all participants in the document's consultation.</p>
	<p>Major Development</p> <p>Dandara agree with the general approach to major residential development, however make the following comments;</p> <ul style="list-style-type: none"> Reference is made in a number of places to respecting the local context and character. Whilst it is accepted as a general approach this should be applied with some flexibility. In order to improve the local context and character, which in some parts of the Borough is not of a high quality, it may be appropriate to pursue an alternative building design which does not relate to the local context or character but would vastly improve the area. This is, to an extent, referred to at paragraph 5.7 though it is considered that the reference to 'replicate' is somewhat confusing as this suggests that elements of 	<p>Noted</p> <p>SPD amended to clarify role of context and character in informing development design, and does not preclude innovative new approaches. Area Action Plan for the Intensification Area cross referenced in text as this will provide the context for design in the central area and may over-ride the SPD</p>

	<p>building design within the local context should be reproduced or copied exactly. This may not be appropriate and it is therefore suggested that this is reworded so as to state that if a different building form is proposed it should be consistent with or draw references to the local context or specifically positive elements of the local context. This should again be reflected at paragraph 5.10.</p> <ul style="list-style-type: none"> • Specifically support paragraph 5.26 which acknowledges that on major development sites or areas in need of regeneration, a departure from prevailing patterns of building height, massing and scale in favour of denser and taller development may be preferable. This is considered to be consistent with the appeal decision for Dandara's College Road site where both the Inspector and Secretary of State confirm the acceptability of a tall building on this site. It is therefore considered positive to look at denser and taller development on other sites, particularly if the objectives of the emerging LDF and draft London Plan are to be met. • Overlooking and privacy is considered at paragraphs 5.27 - 5.29. Whilst we agree with the points made there should also be clear reference to the scope of any potential overlooking in terms of what the impacts would actually be. • Amenity spaces requirements at paragraph 5.34 onwards are considered to be unclear. Whilst it is agreed that new residential developments should provide sufficient levels of amenity space this should not be prescriptive and applied flexibly depending on the details of the proposal. For instance whilst amenity space for family 	<p>SPD amended to provide general guidance for all development, including on matters of context, scale and character.</p> <p>Area Action Plan for the Intensification Area cross referenced in text as this will provide the context for design, including any policies for tall buildings, in the central area and may over-ride the SPD</p> <p>SPD amended to further amplify guidance in relation to privacy and overlooking relationships.</p> <p>SPD amended to further amplify guidance in relation to amenity space. London Plan requirements cross referred to (but not duplicated) in text. However expectation that some amenity space will be provided, or alternatives such as balconies in town centres, reflects UDP Policy D4 which the document seeks to supplement.</p>
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	<p>units is preferable at ground floor if sufficient amenity space is provided elsewhere, in the form of a roof terrace or garden, then there should be no additional requirement for internal amenity space. There also needs to be recognition as to the proposed users of a residential property. For instance a one or two bedroom apartment with no private amenity space is unlikely to present a problem for its occupiers whereas it might for larger units. Reference is made to a requirement of at least 50sqm of functional communal amenity space per development plus 5sqm per additional unit. This is considered far too arbitrary. For example a housing scheme with no communal amenity space but which provides sufficient private gardens should be considered acceptable. Similarly, if all units in an apartment scheme had sufficient private balconies or terraces. There are many successful examples of both types of development throughout London. The requirements and demands of the users of new residential developments need to be more fully considered rather than a prescriptive, specific figure applied.</p> <ul style="list-style-type: none"> • Reference is made to Secure by Design, whilst this is encouraged it should be acknowledged that it is not always possible to incorporate all principles so may need to be applied flexibly. • The application of minimum space standards, particularly ahead of the adoption of the draft London Plan, is not supported. As the draft London Plan forms part of the development plan for Harrow then the inclusion of space standards within the SPD is considered to be superfluous. Notwithstanding this is it also premature to 	<p>SPD amended but cross reference to secured by design retained in relevant parts of text.</p> <p>SPD amended to further amplify guidance in relation to amenity space. London Plan requirements cross referred to (but not duplicated) in text. Applications to be determined in accordance with UDP Policy for amenity space ahead of new London Plan adoption.</p>
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	<p>incorporate these standards until they have been adopted within the London Plan as they have been subject to debate at the recent EiP for the draft London Plan. The implication of any minimum space standards needs to be acknowledged with regards to the cost for purchasers and the subsequent implications on the affordability of open market units. Reference is made to new homes in London being among the smallest in the developed world, however many successful cities, such as New York or Paris are renowned for small apartments which does not make them unattractive places to live.</p> <ul style="list-style-type: none"> • With regards to other internal layout standards it is considered to be too prescriptive to require a specified number of bathrooms for certain size properties. Not only is this considered to be more appropriately driven by market demands it is not appropriate for planning to legislate over these matters. Furthermore, there are significant examples of positive traditional residential properties which do not include a certain number of bathrooms or WC's but which are considered to provide high quality homes. • There should be no specific sizes for balconies as referred to at paragraph 5.56 and proposals should be considered on their merits. 	<p>SPD amended to delete these provisions. Bathroom requirements set out in Accessible Homes SPD.</p> <p>SPD amended – balcony sizes retained for cases where no alternative amenity space provision.</p>
John R Orchard RIBA	<ol style="list-style-type: none"> 1. The SPD is rather long -winded for what should be a 'hands-on' easily readable document for straight-forward guideline referencing. 2. The important design guidelines should be highlighted in heavier font or condensed into 	<p>SPD amended to reduce length and improve clarity.</p> <p>SPD amended so only relevant text retained. Inappropriate to highlight certain parts of guidance over others – all</p>

	<p>bullet type points at the end of each section where they can be easily found.</p> <ol style="list-style-type: none"> 3. Each Section could be colour-coded for ease of use. 4. There should be drawings that clearly show acceptable and unacceptable types of development that will assist in interpreting the guidelines. Hertsmere Borough Council and the London Borough of Hillingdon have SPDG's that are well illustrated. 5. A height of three meters for a building or extension adjacent or on a boundary is too low given the attractive use of parapet walling, varying external ground levels and the continuing increase in depth of thermal insulation and flat roof construction build-up which end up with unacceptably low floor to ceiling heights. 6. Clause 8.5 states "as with all planning applications every case will be considered on its own merits". This is an important statement that should be highlighted in the Introduction Section as there is a tendency for Planning Department staff and the public to consider the guidelines in the SPD's and Conservation Area Appraisal and Management Strategies as 'cast-in-stone', inflexible rules that can jeopardize well designed schemes. The guidelines should be considered as a flexible framework for good design, be it for a major scheme or small extension. 	<p>elements in revised document are important design & layout considerations. SPD amended to provide greater clarity of structure/sections.</p> <p>Drawings/illustrations/photographic examples may be added prior to publication. Extensions Guidance drawings restored.</p> <p>SPD amended to delete 3m height limit for single storey side extensions. Retained as guideline height for single storey rear extensions at the boundary, to be considered as part of site circumstances. (Note: many side and rear extensions now permitted development anyway).</p> <p>SPD amended – new 'status' section confirms that the SPD should not be applied mechanically but as part of assessment of site and other considerations.</p>

<p>Martin Palmer</p>	<p><u>Car Parking requirements for conversion applications</u></p> <p>Parking on Frontages (7.5)</p> <p>Harrow is a Borough of high car ownership with many households owning two or three vehicles.</p> <p>It is noted that the issue of car parking is raised in many objections when houses are converted into flats.</p> <p>Whilst the planners do not recognised this as a problem it could be that they carry out their site visits during the day when residents are using their cars. If inspections were carried out during the late evening or at weekends the problem faced by residents would be more apparent.</p> <p>For this reasons I would request that flat conversions should continue to be bound by the present recommendation of 1.5 parking spaces per residence.</p> <p>If the front garden does not have sufficient space to park three cars I would suggest that the property would not be suitable for conversion into flats.</p>	<p>SPD amended to set out car parking as part of making the connections considerations, and clarifies position regarding disabled persons' parking. Cross reference to London Plan and UDP for maximum parking standards.</p> <p>SPD includes guidance on conversions and forecourt parking layout. However minimum parking requirements beyond the scope of the SPD – would need to be addressed in DPD policy and expressed as maxima in line with Government advice.</p>
	<p><u>Stacking of rooms in new buildings and conversions</u></p> <p>(7.12)</p> <p>Whilst noting the need for “stacking” there is also a need for sound installation between the floors/ceilings of the flats and to party walls as in many cases the lounge of the flat will be situated next to a bedroom of the adjoining property.</p> <p>This matter was raised in the appeal decision Ref. APP/M5450/A/09/2094107 – 174 Exeter Road. The</p>	<p>Beyond the scope of the SPD to increase technical requirements of the Building Regulations; however amended SPD sets out guidelines for stacking/room arrangements to help minimise noise transfer from conflicting activities.</p>

	<p>Appeal Inspector stated in his report “ The submitted plans show that the dwelling would be separated horizontally, the upper flat having the main living room adjacent to a bedroom of No,176 separated from it only by a party wall. Without adequate sound insulation this is likely to lead to undue noise and disturbance to the occupiers of No. 176”.</p> <p>This would ensure that residents of flat conversions can enjoy similar standards as those living in purpose built flats.</p>	
<p>David Summers Greener Harrow</p>	<p><u>Policy Background</u></p> <p>Clarify that Major Developments refer to 10 or more units.</p> <p>What is a unit? Not defined in glossary. Instead of unit, refer to number of bedrooms.</p> <p>Design Criteria should include:-</p> <p>(i) Future proofing - provision for additional cables & pipework, easy access to existing cables and pipework.</p> <p>(ii) distinguish between accessible storage space for infrastructure/services and free space for occupants use. The latter should be defined.</p>	<p>Glossary to be amended</p> <p>Noted</p> <p>Too detailed – beyond the scope of the SPD.</p> <p>As above. However SPD amended to include storage space provision considerations.</p>
	<p><u>Major Development</u></p> <p>ref. 5.12 include provision to replace trees nearer end of life with new trees, encourage wildflowers</p> <p>ref. 5.18 extend to include provision for vehicle</p>	<p>SPD amended to include tree and landscaping provision considerations.</p> <p>Beyond the scope of the SPD.</p>

	<p>refuelling - connection to gas or electric power.</p> <p>ref. 5.40 & 5.47 & elsewhere? - amend "easy access" to "step free access"</p> <p>ref. 5.41/43 include "controlled access", provision for visitors cars, tradesmen, deliveries and secure cycle parking.</p>	<p>Disabled access requirements set out in Accessible Homes SPD.</p> <p>SPD amended to include separate heading/paragraphs on cycle parking. Other matters too prescriptive.</p>
	<p><u>Minor Development</u></p> <p>As per Section 5 as appropriate, plus</p> <p>Ref.6.13 a 3m setback seems very small. How does this link to a 4.8m driveway in 8.42. Insufficient for off street car parking and minimal space for "greenery" / soft landscaping.</p> <p>Ref. 6.27 Weatherproof secure cycle storage.</p> <p>Ref. 6.52 Clarify re on-street car parking. This should be the exception rather than the rule. Also discourage parking within a short 3m front setback as this will be very congested looking & unsightly.</p> <p>Where appropriate the above also apply to Major development, Conversions and Extensions.</p>	<p>SPD amended to remove 3m building setback guideline; setbacks to be informed by character of area/established building lines.</p> <p>SPD amended – cycle parking to be weather protected.</p> <p>SPD amended to clarify guidance in relation to car parking.</p> <p>SPD amended – guidance applicable to major and minor development except where stated otherwise.</p>
	<p><u>Conversion</u></p> <p>As per Section 6 as appropriate, plus</p> <p>ref. 7.9 Why share brown bin? Better share green/grey bin as objective is to minimise use of green/grey and maximise brown (& blue) bin use.</p>	<p>SPD amended – cross refer to Council's existing Code of Practice for waste management.</p>

	<p><u>Extensions</u></p> <p>As per Section 7 as appropriate, plus</p> <p>Ref. 8.81 Focus has been on street side view. Insufficient attention to view of other sides of property from either the street, other residences etc. Many loft developments have resulted in hideous dormer appendages projecting from the roof / loft space. The finish and design needs to be better specified. The back/side of the property is just as important as the front.</p> <p>Ref. 8.67 replace cable by gable.</p>	<p>SPD includes guidance for side and rear extensions, though permitted tolerances for side and rear additions and roof extensions have been increased.</p> <p>Text amended as suggested.</p>
<p>Hertfordshire County Council Planning Policy</p>	<ul style="list-style-type: none"> 5.14 – 5.19 Sustainable movement network would benefit from reference to Manual for Streets which you don't refer to until 6.25. I was interested to read in 5.16 (and 6.24) that 'There will be a presumption against approving new 'gated community' developments in the Borough'. This is an area our district Local Planning Authorities are seeking to control and they may wish to discuss this aspect with you. Certainly we do not feel that as the highway authority we can limit this form of development. 	<p>Noted</p> <p>SPD amended to rationalise duplication/repetition of other documents.</p>
	<ul style="list-style-type: none"> 5.24 I'm not sure I agree entirely with the statement 'The absence of clearly defined boundaries especially long building frontages can blur the edge between public and private space, lead to neglected poor quality spaces between buildings and streets and contribute to 	<p>Noted. However means of enclosure are characteristic of residential development in many of Harrow's suburban areas.</p> <p>In Harrow areas of enclosure are often part of the</p>

	<p>a reduction in perceptions of safety'. I spent a week cycling in Austria in September and was stuck there by the absence of fences and hedges around private properties in particular and how it increased the feeling of space. I think it is a very British thing to fence and given our lack of space only makes our towns feel more claustrophobic. I'm glad to see that you refer to Manual for Streets (at 6.25). This document refers at para 5.6.2 for the need for 'public fronts and private backs'. Isn't personal safety increased by a feeling of sharing of space (and the responsibility) rather a one of division and privacy?</p>	<p>established character of an area, and private spaces are often better maintained than public ones.</p>
	<ul style="list-style-type: none"> • 5.25 needs to make reference for the need of planting, walls and fences to be of such a height as not to obstruct pedestrian/ vehicle intervisibility. See MfS para's 7.8.4, 7.9.2 and fig 7.22. 	<p>SPD amended to reflect consideration of visibility/safety in boundary treatment siting and height.</p>
	<ul style="list-style-type: none"> • 5.41– 5.44 Parking. You say in 6.25 that 'The design and orientation of new residential buildings may also be used to lower traffic speeds in locations where this is needed'. The same can, of course, be said of on street parking. 	<p>Noted</p>
	<ul style="list-style-type: none"> • 5.45 – 5.48 Refuse management and storage is of concern to us in terms of providing sufficient clear at for the refuse vehicles actually used to get near enough for each property to be adequately serviced. 	<p>SPD amended to cross reference Harrow's Code of Practice for waste management, which deals with such matters.</p>

	<ul style="list-style-type: none"> • 6.22 – 6.27 Sustainable movement network Same comments as for 5.14 – 5.19 above. • 6.25 I commend the inclusion of the words: 'The design and orientation of new residential buildings may also be used to lower traffic speeds in locations where this is needed. Developers should refer to the publication 'Manual for Streets (DCLG/DfT (2007) for further guidance on the measures that may be implemented.' 	<p>Noted</p> <p>SPD amended to rationalise duplication/repetition of other documents.</p>
	<ul style="list-style-type: none"> • 6.51 – 6.54 Parking Same comments as for 5.41 – 5.44 above. • 6.55 – 6.58 Refuse management and storage Same comments as for 5.45 – 5.48 above. • 7.6 Car Parking requirements for conversion applications. If not here is the issue of impervious surface in front gardens covered elsewhere? Ditto the creation of a pavement crossovers. • 7.7 Frontage treatment for conversions. Same comments as for 7.6. • 7.8 – 7.9 Refuse management and storage Same comments as for 5.45 – 5.48 above. 	<p>Noted</p> <p>Noted</p> <p>Surfacing materials/SUDS dealt with in Sustainable Building Design SPD and further amplified in Harrow's SFRA.</p> <p>As above.</p> <p>Noted</p>
	<ul style="list-style-type: none"> • 8.84 – 8.87 GARAGES, CARPORTS AND OUTBUILDINGS. We specify that garage doors and gates should be set back from the back of footway so that a vehicle waiting to enter does not obstruct the pedestrian route. 	<p>SPD amended to include reference to 4.8m set back of garage doors.</p>

<p>University of the Third Age Sustainability Group</p>	<p>The main concern of this draft SPD is to improve the quality of the built environment in Harrow and ensure that new houses and flats are fit for purpose. Its stated ambitions include achieving both Harrow's and government's objectives and policies to embed sustainability, promote sustainable design outcomes and highest environmental performance, reduce CO2 emissions, and promote use of renewable energy. This response is concerned solely with these environmental and sustainability aspects of the draft SPD.</p>	<p>Focus of response noted.</p>
	<p>All the policies and guidance on environmental and sustainability matters currently in the draft seem fine as far as they go and should be retained. Examples for major developments are in paragraphs 5.12, 5.14, 5.18, 5.19, 5.30 to 5.32, 5.45 to 5.48, and 5.54 (item 6 in list), and in the equivalent paragraphs in the sections on minor developments and conversions.</p>	<p>SPD amended to focus on design and layout in relation to UDP Policies D4 and D5. Detailed sustainability matters addressed in Harrow's Sustainable Building Design SPD.</p>
	<p>Our main concern is about things that do not at present appear in the draft. It is important to make planners and developers think green from the start of their projects, so that things like energy capture and heat retention are designed in rather than add-ons. They should know that Harrow requires this approach. The following should be added:</p> <p style="padding-left: 40px;">a presumption that major developments should incorporate some form of combined heat and power [CHP] and local generation for the shared benefit of the residents, with surpluses being sold to utility companies. Developers should be required to include these in their proposals or provide a watertight case for not doing so.</p> <p style="padding-left: 40px;">in all developments including conversions and extensions, designs should</p> <p style="padding-left: 40px;">a) incorporate some form of renewable</p>	<p>All of these matters dealt with in the existing Sustainable Building Design SPD, to be used alongside the subject document.</p>

	<p>energy capture, e.g. heat pumps, solar panels/photovoltaic cells, or at least solar water heating</p> <p>b) require high performance insulation for walls, ceilings, and roofs</p> <p>c) double glazing</p> <p>d) require dual flushes for all toilets.</p> <p>So as not to increase rain runoff, flood risk, and aquifer depletion, it should not be permitted to create new impermeable hard-standing for cars on ground that was previously permeable and could absorb and drain water. Alternative permeable surfaces should be required such as reinforced natural grass, porous cellular paving, mesh grids etc</p> <p>A building standard should be applied to all developments such that any new build and newly converted property will last for at least a hundred years. The will save massively in terms of the use of energy and materials over the years given the likelihood that some of the recent building work in the Borough will not last for more than 20 years. Accordingly new build should be flexible enough to adapt to changing personal needs over time and changing technologies.</p>	
	<p>There should be encouragement for the use of energy-saving building techniques and materials, the use of reclaimed materials, green roofs, water saving technology as well as the afore-mentioned ground source heating, solar panels and photovoltaic cells.</p>	<p>These matters dealt with in the existing Sustainable Building Design SPD, to be used alongside the subject document.</p>
	<p>The draft makes good points about refuse management and storage [paras 5.45 to 5.48 and similar]. We would like to strengthen them to assist further separation of wastes early on: developers should be required to provide residents with the best</p>	<p>SPD amended to cross refer to Harrow's Code of Practice for waste management which deals with these matters.</p>

	<p>possible facilities to help them to separate different types of recyclable wastes when they first dispose of them; for instance on a site where three types of recyclables can be handled, have separate bins and chutes for a) kitchen and organic waste b) paper and cardboard c) glass, tins, plastic bottles.</p> <p>Similarly, developers of major and minor projects should be required to provide residents with communal composting bins. These should normally be in sets of three: one for current organic waste to be put into, one for waste to mature into compost in when it's full, and the third as a source of compost for the site's gardens and residents' allotments.</p>	
	<p>The Group is pleased to see a number of paragraphs in the guide which support biodiversity in new residential developments.</p>	<p>Noted; though SPD amended to apply detailed ecological requirements to major development only.</p>
	<p>The installation of power sources for electric cars could also be included, particularly in the development of flats.</p>	<p>Beyond the scope of the SPD; would require policies in a DPD.</p>
	<p>The following points are particularly supported:</p> <p>Ecological proposals to retain veteran trees, plant native trees and shrubs early in a development, the fitting of bird and bat boxes to north facing walls, the preserving of wildlife corridors, possibility of some green roofs. (5.12)</p> <p>Movement networks with priorities given to walking, cycling and public transport and covered cycle ports included in the design of buildings. In residential buildings the cycle parking should also be secure. To encourage less use of cars and fewer parking spaces the</p>	<p>Noted</p> <p>Noted. Provision for car clubs beyond the scope of the SPD (would require DPD policies).</p>

	<p>designs should include parking for car clubs. (5.14)</p> <p>The solar gain proposals are good as research shows that natural sunlight in homes is important for mental and physical well-being. (5.30)</p> <p>The provision of amenity spaces in residential flats is supported, but the area of 50 sqm is very small for a multiple use communal area. We would urge that this be the minimum for a small development and scaled up in proportion for larger developments. (6.49)</p>	<p>Noted</p> <p>SPD amended to cross refer to London Plan standards. Any local requirement, if supported by evidence, would require DPD policies.</p>
	<p>We are concerned that there are rather a lot of possible 'get out clauses' in the document that might be seen by developers as a means of avoiding compliance. For example in 5.34 private space is expected to be provided 'whenever possible'. Similar phrases are used elsewhere and we would urge that they be reduced in number</p>	<p>SPDs cannot be unduly prescriptive – only guidance. However SPD amended to provide clearer text and emphasise the importance of site and other considerations when applying the document.</p>
	<p>Whilst the Guide necessarily focuses on requirements for new build, the Borough also needs to do more in actively encouraging the improvement of existing housing in terms of energy conservation – insulation, solar panels/photovoltaic cells, heat pumps, green roofs. This will save money in the long run and reduce CO₂ emissions, thus enabling sustainability aims to be met.</p>	<p>Limited planning control over retrofitting of existing buildings; nevertheless measures specific to sustainability are included in the Council's existing Sustainable Building Design SPD</p>
	<p>The Group generally supports the Guide subject to the inclusion of comments made above and would like to emphasise that seeing through its implementation, and monitoring compliance are hugely important for the development of the Borough as a pleasant and</p>	<p>Noted.</p>

	sustainable place in which to live.	
Robin Bretherick Associates	<p>The document is generally well expressed and strikes a reasonable balance between flexibility, encouragement and requirement, except where I comment below. I have a number of detailed concerns (below). It is also very long, and given the many other requirements which must be addressed when designing new buildings, I suggest it is too long. I am not convinced by the format – each of the 4 sections standing alone - resulting in extensive repetition. It may be better to split it into 3 separate documents (new build, extensions and conversions). I also assume that the text will also be broken up with photos and/or drawings.</p> <p>I suggest that the guide should make clear that applications will not necessarily be refused solely because of a failure to meet one or two of the guidelines, especially if other planning benefits arise, but that applicants will be expected to show that they have observed the general tenor of the guidance and the design approach set out. See also my general comments later.</p>	<p>Noted</p> <p>SPD amended to reduce length and improve clarity. New structure deals with general principles for all development, but retains separate guidance for conversions and extensions.</p> <p>Drawings/illustrations/photographic examples may be added prior to publication. Extensions Guidance drawings restored.</p> <p>SPD amended – new ‘status’ section confirms that the SPD should not be applied mechanically but as part of assessment of site and other considerations.</p>
	<p>PURPOSE & AIMS</p> <p>Para 2.5 (2nd bullet point): Adjust to say: <i>“is of a high standard”</i>. <i>“The highest standard”</i> is aiming too high, is unreasonable, and is likely to involve excessive cost! Inconsistent with later paras eg 3.1 & 3.3. (I have previously commented similarly on the London Plan revisions).</p>	<p>SPD amended to seek a high standard of design and layout, consistent with the UDP policies which it supplements.</p>

	<p>STATUS OF DOCUMENT</p> <p>Para 2.8: The requirement for the “standards” to apply as a “minimum” is too strict and inflexible for a Guide. I suggest: “<i>The guidelines.....will be applied flexibly</i>” or “<i>the guidelines.....will be relied on, together with Development Plan policies and other supplementary planning documents, as an indicator of the acceptability of a proposal</i>”.</p> <p>Change “<i>of the highest quality</i>” to “<i>of a high quality</i>”. “<i>Highest</i>” is aiming too high and involves excessive cost! See later paras eg 3.1 & 3.3.</p>	<p>SPD amended – new ‘status’ section confirms that the SPD should not be applied mechanically but as part of assessment of site and other considerations.</p> <p>SPD amended to seek a high standard of design and layout, consistent with the UDP policies which it supplements.</p>
	<p>SA/SEA SCREENING</p> <p>Para 2.12: Surely you can’t say that this Guide “<i>will not have any significant impact on the environment</i>”? Isn’t this exactly what it is intended to do? Positively!</p> <p>POLICY BACKGROUND</p> <p>Para 3.4 Best avoid ref to “<i>regional</i>”!</p>	<p>SPD amended to confirm screening for no significant adverse environmental effects.</p> <p>‘Regional’ policy background still relevant in London.</p>
	<p>POLICY GUIDANCE</p> <p>Para 4.6 Historically, there has been much debate (and doubt) about the extent to which ‘planning’ should reasonably control internal space standards and layout (incl room sizes), as this duplicates the Env Health function. In any event, I suggest that “<i>internal space standards</i>” should be reworded as “<i>internal space guidelines</i>” and that “<i>minimum sizes of rooms</i>” should not be expressed as a ‘<i>minimum</i>’ but as an “<i>indicative guideline</i>”. See para 5.51 below.</p>	<p>SPD reflects wording of (emerging replacement) London Plan, to which it cross refers.</p>

	<p>MAJOR DEVELOPMENT</p> <p>Para 5.2 & 5.4 There will be very few opportunities for new dev in Harrow to change the “<i>street system</i>” or alter “<i>the transport and movement pattern</i>”. Schemes of that scale would, I guess, deserve their own planning brief. Omit?</p> <p>Paras 5.5 & 5.6 Some apparent inconsistency between two paras. Would perhaps read better if they were transposed.</p> <p>Para 5.7 refers to a “<i>new dwelling</i>”. But we are looking larger scale here.</p> <p>Paras 5.8 – 5.9 It is difficult to clearly convey a building’s role or function to the general public where ‘innovative’ design is used, as their perception is based on traditional design with which they are familiar. It may be even more difficult in mixed use schemes (other than perhaps at the entrance point), where some design consistency is needed. I wonder how important this is.</p> <p>Para 5.12 (1st bullet point): In major development (eg high density town centre schemes) it is often difficult to “<i>maximise the retention of existing vegetation</i>”. New planting can often be a better approach.</p> <p>Para 5.12 (2nd bullet point): But please do not seek a detailed landscaping plan at the initial application stage, as this requires unnecessary (potentially abortive) extra work while the principle of the scheme remains unresolved.</p> <p>Para 5.12 (3rd bullet point): Early planting can be</p>	<p>Noted, but some opportunities may still occur. Matters dealt with as part of sustainable movement network in amended SPD.</p> <p>SPD amended to provide clarity on character and innovative design.</p> <p>SPD amended – guidance now applicable to major and minor development except where stated.</p> <p>‘Legibility’ of buildings’ uses still considered important and this is reflected in SPD amended text.</p> <p>Noted. Ecological guidelines retained, but should not be applied mechanically (so opportunities for new planting may be sought as alternative to retention).</p> <p>SPD does not seek a ‘detailed’ landscape plan at application stage; and should not be unduly onerous for major development schemes.</p> <p>SPD amended to delete this bullet point.</p>
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	<p>damaged during the dev process.</p> <p>Para 5.12 (7th bullet point): Unrealistic. In practice, it is inevitable that other considerations will determine the “<i>strategic location of development sites</i>” in Harrow, at least.</p> <p>Para 5.15 “Urban Grain” is a different matter? Add to Glossary.</p> <p>Para 5.16 Explain why. I sympathize, but some resistance to this can be expected.</p> <p>Para 5.19. Stretching a point to suggest that cycle racks can “<i>promote a sense of local distinctiveness</i>”!</p> <p>Para 5.23 (2nd bullet point): Covered main entrances do not need to be in the same material.</p> <p>Para 5.23 (3rd bullet point): Not sure why porches “<i>must not project beyond a bay window</i>” esp if you are looking for innovation, etc.</p> <p>Para 5.31 (4th bullet point): Say: within 30 degrees of south (see para 5.32). Even this is not always practical, esp in infill schemes (most Harrow development). Nor is “<i>cross-ventilating breezes</i>”. See para 5.32 below.</p> <p>Para 5.31 (5th bullet point): This is very precise. Generalise or allow flexibility?</p> <p>Para 5.32 (3rd bullet point): Dual aspect is rarely possible for all flats, particularly in a larger-scale higher-density block of flats, not just because of potential overlooking but also because of the need to</p>	<p>The SPD will not seek a detailed landscape plan, but it will need to be demonstrated how landscape provision has been incorporated into the schemes design and layout.</p> <p>SPD amended to remove reference to ‘urban grain’.</p> <p>Noted.</p> <p>SPD amended to refer to racks as a potential visual feature of development.</p> <p>SPD amended to simplify guidance on entrances. Covered entrances dealt with in Accessible Homes SPD (part of Lifetime and Wheelchair Home requirements). SPD amended to generalise guidance for new development; details on projection/bays contained within extensions guidance.</p> <p>SPD amended; established 45 degree code applied as part of visual impact, light and outlook considerations.</p> <p>SPD amended as above.</p> <p>SPD amended to clarify that dual aspect preferable where possible (but also recognises that may be unavoidable in high density development).</p>
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	<p>raise densities and make efficient and effective use of urban land. Where site depth permits, most larger blocks will often be designed on the central corridor principle, with single aspect flats on each side (except perhaps on the corners). Smaller schemes often also have other constraints to prevent dual aspect. The alternative is the less-sustainable approach of increasing the number of stair cores (and lifts), with more circulation space and increased costs. Single aspect flats should continue to be acceptable but with care where a north aspect is involved. (Note, a north aspect has the benefit of a sunlit view, esp if at high level).</p> <p>Para 5.34 Communal open space should be considered sufficient for flats in many cases, especially in central locations.</p> <p>Para 5.35 Add a bibliography or footnote for source of 'Secured by Design' - for the uninitiated.</p> <p>Para 5.36 “.....<i>or demonstrate</i>.....”</p> <p>Para 5.37 I suggest add: “.....<i>in larger schemes, unless local public open space is within a short walk</i>”.</p> <p>Para 5.38 Security issues may require that amenity spaces are overlooked and thus do not have a high level of privacy. (See para 5.40 6th bullet point - below).</p> <p>Para 5.40 (2nd bullet point): The words “<i>minimum</i>”, “<i>require</i>” and “<i>comply</i>” are inappropriate in a guidance document. I suggest: “<i>Encourage designers to consider incorporating</i>”, or perhaps: “<i>seek the inclusion of.....</i>” It is not entirely clear what are “<i>the remaining design elements</i>”.</p>	<p>SPD recognises that communal open space appropriate for flats (except house conversions).</p> <p>SPD amended to include secured by design in glossary.</p> <p>SPD amended to remove requirement for justification through Design & Access Statement. SPD supplements UDP Policy which seeks amenity space provision as part of development. Inappropriate to rely on public open space which serves a different function to private amenity space. SPD amended to recognise this.</p> <p>SPD amended to highlight its status as guidance.</p>
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	<p>Para 5.40 (3rd bullet point): The HUDP avoids quantifying amenity space provision, following difficulties in applying earlier high standards. HUDP para 4.30 currently says that the Council will not seek a “maximum or minimum standard” whereas you are now being very specific. I suggest that this is unnecessary, but if figures are to be used, than they should be expressed as ‘indicators’ with flexibility for small schemes.</p> <p>Para 5.40 (5th bullet point): It will rarely be possible (or necessary) to accommodate both “<i>active and passive uses</i>”, especially if the active use involves ball games.</p> <p>Para 5.40 (6th bullet point): Supports my point on para 5.38 above.</p> <p>Para 5.40 (7th bullet point): Flexibility required especially for smaller schemes. Other constraints may mean that it is not always possible for all flats to have “easy” access to the amenity area.</p>	<p>SPD reflects wording of (emerging replacement) London Plan, to which it cross refers. SPD amended to cross refer but not duplicate London Plan amenity space standards.</p> <p>SPD amended to remove reference to active and passive activities.</p> <p>Noted.</p> <p>SPD amended to simplify guidance on amenity space layout. Access issues dealt with in Accessible Homes SPD.</p>
	<p>Para 5.44 Ref can be made to the Council’s Code of Practice.</p> <p>Para 5.48 Para could be reduced in length.</p> <p>Para 5.50 I suggest delete “.....<i>and inappropriate execution of density standards</i>”, and say either “.....<i>the importance of ensuring effective and efficient use of urban land.....</i>” or words to the effect of “.....<i>the wider need to protect the open countryside and other areas of character while meeting the demand for new housing in the south-east</i>”.</p>	<p>SPD amended to cross refer to the Council’s Code of Practice on waste management.</p> <p>As above.</p> <p>SPD amended – paragraph deleted.</p>

<p>Para 5.51 I suggest delete “<i>minimum</i>” and substitute “<i>improved</i>”. The rigid application of the new figures will militate against the provision of private-sector low-cost housing. In any metropolis there is a need for some compact lower-cost units. In my view, allowance should be made for this, albeit perhaps as a proportion of the number of flats in any scheme. It must also be accepted that increased space standards will inevitably mean fewer units (all other things being equal). Flexibility is required. See para 4.6 above.</p> <p>In response to the draft Replacement London Plan consultation I said the following:</p> <p><i>The general requirements are excessive, especially for small schemes. The space standards are, in themselves, excessive and misconceived. Some of the figures - eg 50 sq m for 1 bed (2 person) flats and 70 sq m for 2b 4p flats are up to 65% larger than some Boroughs currently seek, and in some cases are higher than the old Parker Morris Standards, themselves dropped for being too restrictive. The implications have not been thought through in relation to the need to increase densities, to maintain scheme viability, to maximise housing provision, to ensure affordability and to achieve sustainability. The policy will rule out some marginal redevelopments and conversions, and add yet further costs to others. A proportion of modest-sized dwelling units is required and expected in all cities, especially London, and this reflects the limited land availability in our increasingly crowded Island. The inevitable reduction in development densities will simply spread development more widely putting more pressure on the Green Belt and other green field sites, and introducing conflict with other sustainability policies.</i></p>	<p>SPD cross refers to London Plan standards which have been tested at examination in public and expressed as minima for London.</p> <p>Noted</p>
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	<p>Note, some of the figures (in your appendix B) have since changed (see “Early Suggested Changes to the Draft Replacement London Plan”): 3b 6p flats are 95 sq m; 3b 4p houses are 87 sq m.</p> <p>Para 5.52 most of these matters are already covered under the Bdg Regs or EHO standards, sometimes with less strict requirements. ‘Planning control’ should not be inconsistent or duplicative. I suggest these matters should be left to these other controls.</p> <p>Para 5.53 Delete “<i>Conversions</i>” – covered later. Stacking is not now so crucial given the Bdg Regs requirements for sound insulation between flats. Appropriate stacking is not always possible, esp where use is made of a roof-space with a smaller plan area. Omit, or flexibility required.</p> <p>Para 5.59 (2nd bullet point): Suggest add “<i>generally</i>”, before “<i>to be avoided</i>”.</p> <p>Para 5.60 (2nd bullet point): Suggest add “<i>eg</i>”, after “<i>outcomes</i>”.</p> <p>Para 5.60 (3rd bullet point): Improve grammar (1st sentence). Do you really mean “<i>directly onto the road</i>”.</p> <p>Para 5.61: “<i>Innovative contemporary roof designs</i>”, by definition, seem unlikely to harmonise in all the ways suggested. Perhaps best to simply base this approach on the value of adding variety and interest to the street or area.</p>	<p>SPD amended to omit appendix B.</p> <p>SPD retains guidance on stacking of rooms as a supplement to the technical achievements (which are not absolute) of the Building Regulations in addressing horizontal and vertical noise transference.</p> <p>As above. SPD is guidance so therefore allows for flexibility in application.</p> <p>SPD amended to provide general guidance on materials/colour.</p> <p>SPD amended to provide general guidance on fenestration detail.</p> <p>Deleted from amended SPD.</p> <p>Sentence deleted from amended SPD.</p>
	<p>MINOR DEVELOPMENT</p> <p>As much of this is a repeat of Section 5, most of my</p>	<p>Noted; see above responses.</p>

	<p>above comment apply. In addition:</p> <p>Para 6.11: Suggest delete “<i>definition and enclosure to adjoining streets</i>” and add “<i>continuity of character and scale to a street</i>”. Not sure about last line.</p> <p>Para 6.13: Perhaps some ref could be made to the standard inter-war street character which predominates in much of the Borough where semis and terraced houses stand on deeper building lines (eg 5 metres) and can thus accommodate a car in the garage driveway. It may be appropriate for infill dev to respect this alignment in many cases.</p> <p>Para 6.15 “<i>tenure</i>” ?</p> <p>Para 6.29 I am not convinced by this para. I am not sure I really understand it! Is it necessary? If so, simpler wording would assist!</p> <p>Para 6.30 (1st bullet point): Adding “Urban Grain” to the Glossary could enable you to delete the explanation from here.</p> <p>Para 6.30 (2nd bullet point): Do lounges, sitting rooms and dining rooms really need less privacy? Balconies are likely to look out of place in most established Harrow streets. In any event they should ideally go on the south (ish) side, which stands a 50/50 chance of being at the rear!</p> <p>Para 6.56: Some gardens may be too small to make significant use of on-site composting facilities.</p>	<p>SPD amended to provide general guidance on pattern of development.</p> <p>SPD amended to include guidance relating to character and suburban development.</p> <p>Deleted.</p> <p>SPD amended to provide general guidance on local character as part of detailing the place considerations.</p> <p>SPD amended to remove reference to ‘urban grain’.</p> <p>SPD amended to provide general privacy & amenity, and on use of balconies as part of amenity considerations.</p> <p>Noted – this would be a site consideration.</p>
	<p>CONVERSIONS</p> <p>In addition to the previous comments, where relevant, I</p>	

	<p>add:</p> <p>Para 7.4 – 7.5 This effectively rules out conversions of terraced property.</p> <p>Para 7.7 (bullet points): Could add a ref to front/side boundary walls. Some illustrative material would be helpful esp. for bin stores.</p> <p>Para 7.9 (1st bullet point): Cleansing Section are sometimes able or willing to reduce the provision.</p> <p>Para 7.9 (3rd bullet point): Add <i>“unless carefully designed and screened”</i>.</p> <p>Para 7.10: Delete <i>“..scape”!</i></p> <p>Para 7.11: Add <i>“..wherever practical”</i></p> <p>Para 7.12: Add <i>“..wherever practical”</i>. Bdg Regs will provide sound insulation between flats.</p> <p>Generally. I consider it important to avoid too many constraints on conversions, in order to maintain viability. They are a useful source of modest low-cost housing in a suburban area for those who do not wish to live in the more urban higher-density Intensification Area. They are also useful in providing business for smaller building developers and contractors who cannot take on the larger-scale urban schemes of new-build flats.</p>	<p>SPD amended to allow for conversion of terraced property.</p> <p>SPD amended to include reference to boundary treatment. Drawings/illustrations/photographic examples may be added prior to publication.</p> <p>Noted. SPD amended to cross refer to Harrow’s Code for Practice for waste management.</p> <p>SPD amended to allow for screened frontage storage in terrace conversions.</p> <p>SPD amended to delete this paragraph.</p> <p>SPD amended to reflect need for flexibility in application on London Plan space standards in relation to conversions. SPD retains guidance on stacking of rooms as a supplement to the technical achievements (which are not absolute) of the Building Regulations in addressing horizontal and vertical noise transference.</p> <p>SPD is largely a formalisation of existing practice, and gives effect to existing UDP policies. As noted above, SPD allows for pragmatic application of London Plan standards, but still relevant to conversions.</p>
<p>EXTENSIONS</p> <p>8.2 Some pretty large extensions can now be PD.</p>		<p>Noted</p>

	<p>8.5 Refer to need for LB consent and perhaps CA consent.</p> <p>8.6 Refer to HUDP or LDF policy.</p> <p>8.19 “.....will normally be required.....”. Some houses (eg Kerry Ave) have flat roofs.</p> <p>8.20 A parapet does add to the height of an extension. A simple nosing detail can keep the height down where necessary, eg on a boundary.</p>	<p>SPD amended to draw attention to possible need for LB and CA consent.</p> <p>SPD amended to refer to UDP Policy EP 34 (extensions in the Green Belt). This would be part of site considerations.</p> <p>Noted; SPD would not preclude such alternatives.</p>
	<p>COUNCIL PROCEDURES</p> <p>More appropriate title?</p> <p>9.1 See above obs on internal matters.</p> <p>Allow for recent changes to requirements for D & A Statements</p>	<p>SPD amended to omit this section</p>
	<p>SPACE STANDARDS</p> <p>See above (paras 4.6 & 5.51) and changes to draft Replacement London Plan: 3b 6p flats are now 95 sq m; 3b 4p houses are now 87 sq m. EIP Inspector’s response to figs and representations awaited.</p>	<p>SPD amended to cross refer to London Plan only, in case of changes/pending EIP outcome.</p>
	<p>Generally</p> <p>As you will appreciate, the appearance of a building is also affected by the quality of materials and the standard of workmanship, factors which are normally outside the Council’s control.</p>	<p>Noted</p>

	<p>Any judgement on matters of visual design and appearance is inevitably somewhat subjective (despite all the above). The Council's decisions on such matters must be guided by good, carefully considered, professional advice. It is essential that Harrow continues to have adequate, suitably-experienced professional staff as part of their Development Management function to assist in achieving good-quality and appropriate local design solutions and to avoid unjustified refusals of permission.</p> <p>I hope you can include the above suggested changes in the final version of the Guide.</p>	<p>Noted. Harrow has access to professional design expertise provided by Design for London.</p>
<p>English Heritage</p>	<p>Thank you for consulting English Heritage on the Harrow Design Guide Supplementary Planning Document (SPD). English Heritage welcomes the opportunity to comment on this document.</p> <p>Planning Policy Statement 5: Planning for the Historic Environment (2010) (PPS5) (Policy HE3) emphasises the need for local development frameworks to set out a positive and proactive strategy for the conservation of the historic environment by taking into account the variations in type and distribution of heritage assets. It also highlights the value of the historic environment in influencing the character of the environment and area' sense of place as well as a stimulus to inspiring new developments of high quality design. Planning Policy Statement 1: Delivering Sustainable Development (PPS1) (2005) in paragraphs 33 – 39 on sustainable design reflects these sentiments in that it includes a requirement that local</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>

	<p>planning authorities prepare robust policies on design which are based on “an understanding and evaluation of its present defining characteristics” and which “respond to their local context and create or reinforce local distinctiveness” (paragraph 36).</p>	
	<p>This SPD has an important role in implementing the Borough’s emerging Core Strategy and national policies at a local level, by ensuring that new residential development enhances Harrow’s distinctiveness through locally informed and appropriate designs. We therefore wish to ensure that the Borough’s heritage assets and wider historic environment that help define the local distinctiveness of Harrow is explicitly addressed throughout the document, at all types and scales of development.</p>	<p>Noted</p>
	<p>To help address this current deficiency in the SPD we note that the Borough is in the process of producing a borough-wide character study. We understand that this study is being developed as that there is a greater appreciation of the borough’s historic environment and local distinctiveness. We support this approach as it reflects the requirements of both PPS1 and PPS5, as long as the evidence collected and analysed is used in the development and implementation of this SPD. In the meantime we would welcome our engagement with the development of the borough-wide characterisation and would encourage you to consider advice published by English Heritage, such as Understanding Place (2010) (web link: http://www.english-heritage.org.uk/publications/understanding-place-principles-practice/).</p>	<p>The draft Character Study has been sent to English Heritage for comment.</p>
	<p>This publication highlights the need for developments, including residential, are informed by a thorough understanding of the historical evolution of its location, and of the built form which has resulted from this. This should include, for example, spatial layout, residential</p>	<p>Noted</p>

	<p>typologies and prevalent local materials. <i>Understanding Place</i> (2010) provides further guidance on how this approach can be implemented. In addition the joint English Heritage/CABE publication <i>Building in Context</i> (2003) provides a series of useful and informative case studies on how new designs can be inserted successfully into the existing historic context.</p>	
	<p>Attached to this letter we have set out a number of detailed comments that seek to demonstrate how a historic environment-sensitive approach could be achieved within the Major Development section of the document. We would strongly suggest that many of the points raised can be applied to other parts of the SPD</p>	<p>Noted</p>
<p>2.5</p>	<p>We suggest that response to historic context should be recognized as a key objective of the SPD. This could be achieved via a reference to the historic environment, inserted into the first bullet of paragraph 2.5 to read: “responds to local and historic context...”</p>	<p>Conservation Area design dealt with in SPDs and associated documents for Harrow’s conservation areas. This SPD amended to include guidance relevant to centres and suburbs which more closely reflects the heritage and character of these areas.</p>
<p>3.2</p>	<p>PPG15 has now been replaced by PPS5 (2010), along with its supporting documents the Historic Environment Planning Practice Guide (2010) and the Government’s Statement on the Historic Environment in England (2010). These documents should be reference in paragraph 3.2.</p> <p>3.3</p> <p>PPS5 seeks to conserve all heritage assets, including listed buildings and conservation areas. It also requires that local development frameworks set out a positive and proactive strategy that reinforce local distinctiveness, heritage assets and wider historic environment. To reflect PPS5 we suggest that the key aims relating to listed buildings and conservation areas are replaced by the following:</p> <ul style="list-style-type: none"> · “conservation of the historic significance of heritage 	<p>SPD amended to reference PPS 5 where appropriate.</p> <p>SPD amended to rationalise the scope and purpose of the document.</p>

	<p>assets and their settings”</p> <ul style="list-style-type: none"> · “Consideration of the wider historic environment for its contribution to local character and sense of place, and the stimulus it can provide to inspire new development of imaginative and high quality design” 	
	<p>4.4</p> <p>We welcome the reference to pattern of development in consideration of a building’s relationship to context. However it is also important to consider the historic elements of the built context which have arisen from the pattern of development. We therefore recommend that this second bullet of paragraph 4.4 should be amended to the following: “pattern of development and historic character”. We also suggest that prevailing building heights and local landmarks are fundamental elements of local context and should be also identified in the text.</p>	<p>Noted</p> <p>SPD amended to address local character and building height as part of Creating the Urban Structure considerations.</p>
	<p>5.2</p> <p>It should be noted that many of the comments raised in the Major Development section are relevant to the other sections of the SPD, such as Minor Development, Conversion and Extensions. We would advise these sections are also reviewed so that they reflect fully the need to conserve the Borough’s heritage assets and wider historic environment. To reflect PPS1 and PPS5 we advise that the Local context and character section of chapter 5 should take greater account of the historic environment. For example, paragraph 5.2 should include consideration of the historic evolution of the site’s setting and the relationship between the site and any surrounding heritage assets.</p> <p>5.3</p> <p>In paragraph 5.3 the level of detail provided will also be</p>	<p>SPD amended to provide general principles applicable to all development. However the SPD supplements UDP Policies D4 and D5; policies relating to the historic environment already supplemented by Conservation Area SPDs, management strategies etc.</p>

	<p>dependent on the significance and sensitivities of any heritage assets which may be impacted. It is important to ensure that where heritage assets will be affected that the level detail and type of information provided complies with PPS5, principally policy HE 6. This should be explicitly expressed in the text.</p> <p>5.6 We would suggest that successful integration of innovatively designed buildings should also include consideration of the historic context such as the local building hierarchy and spatial forms, historic landmarks, and prevailing design, features and materials of historic interest and value.</p>	
	<p>5.11 We suggest that the grain of the urban form and its reflection in the rhythm of frontages are included in the list of considerations. Understanding these aspects for the built form can help ensure both major and minor developments integrate successfully with their surroundings.</p>	<p>SPD amended to include pattern of development and local character considerations.</p>
	<p>5.12 Ecological considerations The implementation of green roofs and walls are in generally supported if they do not undermine the significance of heritage assets. PPs5 Policy HE1 states clearly that a balanced approach is needed when considering the need to conserve the historic environment and meet the needs of climate change. The policy seeks to ensure that the significance of heritage assets are not irreversible lost due to mitigation and adaptation measures being inappropriately applied. In view of this, we welcome the approach set out in paragraph 5.13, subject to further clarity given with regards to the need to conserve the historic environment a part of a balanced approach to introducing ecological measures.</p>	<p>Noted. Any conflict can be considered on a case by case basis.</p>

	<p>5.14/5.15 Sustainable movement network When laying out new development it is important to ensure that historic routes and urban grain is not lost or harmed. For example, there may be historic routes within large development sites which could be lost through comprehensive redevelopment, or there may be areas which are characterized by a particular urban structure which should be protected as part of the local character. In addition there maybe opportunities reinstate historic urban features as part of new redevelopment schemes. We therefore suggest inserting a paragraph to ensure that layouts are informed by consideration of historic context such as its routes and spatial forms, urban grain, and block forms.</p>	<p>SPD amended to include reference to the possible restoration of historic development patterns or routes.</p>
	<p>5.26 Building size and scale We note that the text states that in Harrow Town Centre and major development sites or areas in need of regeneration, buildings taller than the prevailing height may be preferred. We would strongly advise that this type of policy approach should be addressed at the Core Strategy level before it is refined int his SPD. English Heritage’s letter dated 8th January 2010 in response to the Core Strategy Preferred Option highlighted our concerns with regards to how the Borough proposes to manage tall buildings, with an emphasis upon directing tall buildings towards the Harrow and Wealdstone Intensification area. As previously stated we would advise that the Core Strategy and this SPD as a supplement of the Core strategy policies, sets out a robust plan led approach to managing tall buildings in line with the English Heritage/CABE Guidance on Tall Buildings (2007). For example the SPD could help provide further</p>	<p>SPD amended to cross reference existing UDP provisions on building heights and views. Policies on these matters beyond the scope of the SPD and would need to be pursued through DPDs.</p>

	<p>clarity of the circumstances where tall buildings may be appropriate within the Harrow and Wealdstone Intensification Area in line with the Criteria Evaluation section of the EH/CABE Guidance. This section contains a comprehensive sets of issues to be considered when determining whether to grant approval for tall buildings, including due consideration of heritage assets and their settings. This is an important issue which should be addressed fully at the Core Strategy level and refined via Development Plan Documents such as Action Area Plans, before being considered at the SPD level.</p>	
	<p>5.59 We suggest amending the second bullet of paragraph 5.59 (penultimate line) to ensure that materials in new residential development complements the historic context, as well as the surrounding streetscape. For consistency with PPS5, the final bullet should be reworded to address all heritage assets and their settings. This will ensure, for example, that new development adjacent to a registered park, respects its historic significance. We suggest the following: “New residential buildings that are proposed within the borough’s conservation areas, heritage assets including their settings, such as conservation areas, will need to comply with the relevant Conservation Area’s SPD, and with Core Strategy heritage policies concerning the use of particular building materials.”</p>	<p>Detailed control of materials addressed through Conservation Area SPDs.</p> <p>SPD amended to provide more general guidance on materials and colour. SPD would not preclude consideration of heritage impacts when approving choice of materials in relevant cases.</p>
	<p>7 Conversions We would strongly advise that this section highlights the need to consider the impact of conversions upon buildings and places of historic interest. Principally that the significance of heritage assets</p>	<p>SPD amended to include reference to consideration of potential listed building/conservation area implications of conversion proposals.</p>

	<p>including listed buildings and other buildings that are valued for their historic interest are assessed fully and valued before considering the appropriateness of conversion. This approach should reflect essentially the development management components of PPS5.</p>	
	<p>8.5 Conservation Areas and Listed Buildings. We welcome the reference made to these types of heritage assets, however it is important to ensure that all heritage assets are considered (e.g. registered parks and gardens, scheduled monuments). In addition the language used and approach to good conservation reflect fully PPS5. This includes recognizing concepts such as significance, and proportionality. Finally it is also important to highlight that the setting of all heritage assets should be carefully considered as part of the design process. This includes buildings that may be outside a conservation area, or not identified as a listed buildings, but due to the changes proposed could have an impact upon their setting and significance as designated heritage assets.</p>	<p>Extensions unlikely to impact upon historic parks & gardens and scheduled ancient monuments in most cases. SPd does not preclude consideration of these issues on occasions when they arise in connection with domestic development.</p> <p>SPD does not preclude consideration of proposals' setting on conservation areas or listed buildings, where relevant.</p>