



The Planning
Inspectorate

Report to Harrow London Borough Council

by **Inspector P W Clark**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 28 May 2013

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE DEVELOPMENT MANAGEMENT
POLICIES, SITE ALLOCATIONS AND HARROW AND WEALDSTONE AREA
ACTION PLAN**

LOCAL PLANS

Documents submitted for examination on 8 October 2012

Examination hearings held between 22 and 30 January 2013

File Refs: M5450/429/6, 7 and 8

Abbreviations Used in this Report

AAP	Area Action Plan
AAPDPD	Area Action Plan Development Plan Document (now Local Plan)
AAPLP	Area Action Plan Local Plan
CS	Core Strategy
DMPDPD	Development Management Policies Development Plan Document (now Local Plan)
DMPLP	Development Management Policies Local Plan
DPD	Development Plan Document (now Local Plan)
GB	Green Belt
GLA	Greater London Authority
LDS	Local Development Scheme
LP	Local Plan
LPA	Local Planning Authority
MM	Main Modification
MOL	Metropolitan Open Land
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SADPD	Site Allocations Development Plan Document (now Local Plan)
SALP	Site Allocations Local Plan
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
TfL	Transport for London
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document

Non-Technical Summary

This report concludes that the **Harrow London Borough Council Development Management Policies, Site Allocations and Harrow and Wealdstone Area Action Plan** Local Plans provide an appropriate basis for the planning of the Borough over the next 15 years providing a number of modifications are made to the Plans. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plans. Most of the modifications to address this were proposed by the LPA, and I have recommended their inclusion after full consideration of the representations from other parties on these issues.

The modifications can be summarised as follows:

- Introduction of presumption in favour of development;
- Reduced duplication or overlap between policies;
- Deletion of superfluous or explanatory material;
- Deletion of policy statements from justification and inclusion in policies;
- Reinforcement of justification;
- Deletion of validation requirements masquerading as development policy;
- Revisions to dwelling mix policy to correspond with evidence;
- More pragmatic policy towards housing conversions;
- Greater recognition of viability in retailing and employment policies;
- Refined policy towards loss of pubs and other community facilities;
- Adjustment of policy on protected views to recognise enhancements;
- Deletion of site allocations where availability unproven.

Introduction

1. This report contains my assessment of the Harrow London Borough Council Development Management Policies, Site Allocations and Harrow and Wealdstone Area Action Plan Development Plan Documents (now known as Local Plans) (the DMPLP, the SALP and the AAPLP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plans' preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plans are sound and whether they are compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be sound plans. The basis for my examination are the submitted draft plans (October 2012) which, apart from minor modifications, are the same as the documents published for consultation in July 2012.
3. My report deals with the main modifications that are needed to make the Plans sound and legally compliant and they are identified in bold in the report (**MM**). A number of modifications are made for more than one reason and so, on occasions, there will be repeated references to the same modification number. In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plans unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendices.
4. The main modifications that go to soundness have been subject to public consultation. I have taken the consultation responses into account in writing this report. Consequent minor adjustments are made to the modifications.

Assessment of Duty to Co-operate

5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
6. To an extent, in London, the duty to cooperate is achieved through the workings of the Mayor's London Plan. The Mayor has confirmed that the three Harrow Local Plans comply with the London Plan. A striking example of the effects of this cooperation is evidenced in the Inspector's report of the Examination of the Core Strategy. This records that only 6,050 of the Borough's projected 23,000 increase in households need be provided for by housing provision within the Borough, justified because Table 3.1 of the adopted London Plan shows that the balance would be provided for by enhanced growth in east London. Notwithstanding modifications which delete some site allocations because their delivery cannot be relied upon, the three Local Plans are likely to deliver considerably in excess of the housing figures required as a minimum by the London Plan and Core Strategy and so will contribute to wider needs.

7. The spatial vision of the adopted Harrow Core Strategy includes the aspiration for partnership working with the neighbouring boroughs of Barnet and Brent to have secured coordinated public realm enhancements to Edgware, Burnt Oak, Kingsbury and Kenton centres which straddle the borough boundaries. Paragraph 11.3 of the CS records that Edgware is predominantly located within the London Borough of Barnet and that that authority has undertaken to prepare a framework to manage growth and change within the centre. It promises that Harrow Council will support the development of the framework and will identify sites, as required, in the Site Allocations DPD (now Local Plan). The SALP does so.
8. Paragraph 11.4 of the CS records that Burnt Oak District centre straddles the boundaries of Harrow, Brent and Barnet. An Opportunity Area Planning Framework is being prepared by the Greater London Authority, in partnership with neighbouring boroughs for the Burnt Oak/Colindale opportunity area. The CS asserts that Harrow Council will engage in this process.
9. Paragraphs 14.26 and 14.27 of the CS record Harrow's participation in the London-Luton-Bedford growth corridor partnership and in the West London Partnership group of Boroughs. The CS asserts the Council's intention to use these partnerships to address cross boundary matters. It also records Harrow's partnership in the Brent Valley and Barnet Plateau Green Grid Framework through which it intends to explore with the London Borough of Brent specific issues relating to the interaccessibility of Kenton and Northwick Park stations. The Statements of Representation for each DPD (Local Plan) record the outcomes of these meetings and also those of quarterly scheduled meetings with Hertsmere and Three Rivers District Councils, the adjoining local authorities outside London.
10. The Core Strategy also records that the Harrow and Wealdstone Area Action Plan is prepared jointly with the Greater London Authority (GLA) and other partners. The Statements of Representation for all three DPDs (Local Plans) record the secondment of a GLA officer to the Harrow Local Plans team to provide advice on policy development so as to secure consistency with the London Plan.
11. Both the three Local Plans themselves and their evidence base make numbers of references which demonstrate their integration with the strategies and plans of other authorities. There are examples of adjustments to the content of the three plans in response to contributions from Thames Water and English Heritage amongst others. A major inspiration for a principal theme of the Development Management Policies DPD (Local Plan) has been the Drain London project run by a partnership of the GLA, London Councils, the Environment Agency and Thames Water. This has resulted in the Surface Water Management Plan for Harrow, which provides the evidence base for a number of DMPLP policies.
12. These examples convince me that the three local plans have been prepared in compliance with the duty to cooperate.

Assessment of Soundness

Preamble

13. The three Harrow DPDs (Local Plans) are prepared within the context of the London Plan and an adopted Core Strategy. Specific references to Harrow within the London Plan are few. Map 2.4 identifies Harrow and Wealdstone as an Area for Intensification where policy 2.13 and Annex 1 seek substantial employment growth through an uplift in retail, office and hotel development, the intensification of industrial and other business uses and the accommodation of a substantial portion of the borough's future housing need. London Plan policy 2.15 and table A2.1 identify Harrow as a metropolitan centre with a medium potential for growth and a night time economy cluster of more than local significance. Six District centres are identified with medium potential for growth.
14. Paragraph 14.6 of the Core Strategy provides the specification for the Development Management Policies DPD (Local Plan). It includes fourteen bullet points;
 - Protection of structural features (areas of Special Character, Green Belt, Metropolitan Open Land)
 - Protection of identified views
 - Protection of open space
 - Management of sport, recreation and open space
 - Protection of biodiversity
 - Protection and enhancement of heritage
 - Protection of Local Character
 - Promotion of high quality and sustainable building design
 - Promotion of high quality and affordable housing
 - Management of employment land
 - Reduction of flood risk
 - Promotion of town centre vitality and viability
 - Promotion of sustainable transport
 - Provision and protection of social and physical infrastructure
15. The DMPLP seeks to reflect the task it is set by using a series of criteria based policies against which planning applications will be assessed, including policies which give effect to designations shown on the adopted policies map. As submitted it was organised into twelve thematic chapters containing a total of 62 policies;

- Introduction and planning policy context
- Character and amenity
- Conservation and Heritage
- Environmental Sustainability
- Open Space and the Natural Environment
- Housing
- Employment and Economic Development
- Town Centres and Neighbourhood Parades
- Transport and Waste
- Community Infrastructure
- Telecommunications
- Implementation, Resources and Monitoring

There was also a glossary, five schedules and three appendices. The content of the DMPLP satisfies the expectations of both London Plan and Core Strategy.

16. Paragraph 14.7 of the Core Strategy provides the specification for the Site Allocations DPD (Local Plan). It is to identify previously-developed sites for development outside the Intensification Area (the area of the AAP). It also defines the area of application of certain geographically-defined policies.
17. Contrary to the description in paragraph 1.2 of the SALP, it is organised into eight thematic chapters (introduction, retail, employment, housing, green belt, open spaces, biodiversity and other) within which sites are arranged by reference to the nine geographical sub areas identified in the Core Strategy. Modifications are proposed to correct the description (**MM502 and 503**) and other errors (**MM520**). There are also five appendices.
18. A reading of the Core Strategy might lead to an expectation that the SALP would designate sites for key junction improvements, improvements to orbital transport connections, provision of the green grid, designation of Rayners Lane and Mill Farm estates for regeneration and proposals for increased connectivity between Kenton and Northwick Park stations. These do not appear within the SALP.
19. The Council explains that the Core Strategy was prepared to coordinate spatial outcomes across a range of activities not limited to the statutory planning system. In consequence, its implementation is not confined to the three submitted DPDs (Local Plans) but also involves plans and documents outside the statutory town planning system. Junction improvements, orbital transport connections and connectivity between Kenton and Northwick Park stations will be delivered through the Local Implementation Plan. The Green Grid is a self contained project (although where its implementation would be through

developments on allocated sites, this is stated, both in the SALP and the AAPLP). The Rayners Land and Mill Farm estates are already under redevelopment. Provisions within the SALP are limited to those which would be implemented through the town planning system. A modification (**MM733**) provides a cross reference to the locations where the full programmes may be found. With this understanding, the content of the SALP otherwise satisfies the expectations of the London Plan and the Core Strategy.

20. The specification for the Area Action Plan is contained within paragraphs 14.4 and 14.5 of the Core Strategy. It is intended to set out development management policies and allocate sites for the delivery of development within the Harrow and Wealdstone Intensification Area.
21. The AAPLP is organised into seven chapters; an introduction; a context setting chapter; a vision; a policy setting chapter; a site allocation chapter; a delivery and monitoring chapter and a chapter setting the geographical areas for the application of certain policies. There are also three appendices. The range of the AAP satisfies the expectations of the London Plan and the Core Strategy.
22. Representations pointed out a lack of specific proposals for new leisure and cultural facilities and for improvements to Harrow bus and railway station. Suggestions were made as to the kind of leisure and cultural facilities which would benefit the town centre but, in the absence of any specific proposal, evidence of harm as a result of their absence, or that proposals would be viable and deliverable, the absence of proposal does not demonstrate that the plan would be unsound.
23. The statement in paragraph 2.17 of the AAP that Harrow bus station lacks operational space which means it cannot meet future growth requirements lends credence to the idea that without a proposal to overcome that difficulty, the AAP might not be sound. The Council explains that Harrow's Local Implementation Plan includes an allocation for the delivery of additional bus standing space in Kymberley Road, which is adjacent to the bus station. Although this may provide no more than a short term solution, it does mean that the absence of a proposal in the AAP is not necessarily unsound.
24. I am also advised that the Council has commissioned consultants to redesign the road layout of Kymberley Road, Headstone Road and part of College Road to aid in bus movements. Although there can be no guarantee that this exercise will discover a longer-term solution to the need for increased and improved accommodation for buses in the town centre, it confirms that the absence of a specific proposal at this stage is not a reason for declaring the plan unsound.

Main Issues

25. Taking account of all the representations, written evidence and the discussions that took place at the examination hearing I have examined these three plans in accordance with the four criteria for soundness set out in paragraph 182 of the National Planning Policy Framework, that is; positively prepared, justified, effective and consistent with national policy. From this examination, I have identified seventeen main issues upon which the soundness of the Plans depend.

Issue 1 – Positively prepared

26. The NPPF explains that to be positively prepared, a plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. As noted above, a striking feature of the Core Strategy is that it is based on the London Plan which seeks not to meet Harrow's objectively assessed housing development requirements within Harrow but elsewhere within London. This strategy has been found sound within examinations of both the London Plan and the Harrow Core Strategy.
27. This deflective approach has allowed the Core Strategy to reconcile its four objectives of; protecting the historical and environmental features that contribute to Harrow's character and distinctiveness; enhancing infrastructure, environment and other resources; managing the Borough's contribution to climate change and increasing resilience to flooding and; adapting to population and demographic changes.
28. In consequence, because most of the demand for new housing development is being deflected elsewhere, much of the emphasis of the DMPLP appears restrictive. Of the fourteen bullet points which set out the specification for the DMPLP in paragraph 14.6 of the Core Strategy, five contain presumptions against various forms of development.
29. This partly negative tone is misleading because the three plans must be read together and in conjunction with the Core Strategy as a single Local Development Framework within the context of the London Plan. When seen in this light, the relatively negative tone of the DMPLP can be understood; paragraph 157 of the NPPF sets out eight bullet points which Local Plans should deliver. The DMPLP focuses on two of these; identifying areas where it may be necessary to limit freedom to change the use of buildings and; identifying land where development would be inappropriate, for instance because of its environmental or historic significance.
30. The other two plans focus on the positive. There are signs that, in places, the Council may have been too enthusiastic in positively identifying development opportunities in both the SALP and the AAPLP; a number of representations made the point that landowners had been unaware of the Council's allocation of their property for development and had no present intention of releasing their sites. Between the submission of the plans and the hearing sessions, the Council made contact with these landowners. In consequence the Council proposes modifications withdrawing some allocations (**MMs 504, 505, 507, 508, 509, 512 and 521**). In other cases, landowners confirmed their acceptance that their site could or would be made available for development during the lifetime of the plans.
31. In a few cases the examination has thrown doubt upon the justification for including some sites. These are detailed below and modifications made accordingly. Collectively, they do not defeat the attainment of the plans' numerical objectives. Rather, as noted earlier, they are likely still to produce an outcome in excess of London Plan and Core Strategy requirements in terms of housing and employment. They confirm that the Council has taken a proactive approach to the identification of development opportunities and so demonstrate that, taken as a whole with the Core Strategy, the three plans

amount to a positively prepared Local Development Framework.

Issue 2 – Consistency with National Policy

32. The examination has tested the three Local Plans against the requirements of the National Planning Policy Framework. As submitted, they complied in all respects except for paragraphs 15 and 154 of the Framework.
33. The first of these supersedes the requirement, formerly in paragraph 4.30 of Planning Policy Statement 12 *Local Spatial Planning*, which advised against the repetition or reformulation of national policy in Local Plans. The NPP Framework now requires plans to reflect the presumption in favour of development, with clear policies to guide how that presumption will be applied locally. A model policy has been prepared for inclusion in Local Plans.
34. The Core Strategy was prepared and adopted before the publication of the NPPF and so does not contain the model policy. The Development Management Policies Local Plan applies throughout the borough, including the Intensification Area. Other than chapter 1, its chapters and policies are thematic and so I recommend modifying the plan by the insertion of the model wording of the presumption in favour of development within that chapter **(MM2)**. As this is simply a restatement of National Policy which has itself been the subject of sustainability appraisal and is also implicit in, and entirely consistent with, the existing thrust of the Local development Framework, no additional sustainability appraisal would be needed.
35. Paragraph 154 of the NPPF requires Local Plans to be aspirational but realistic. They should address the spatial implications of economic, social and environmental change.
36. From a reading of the Core Strategy, it is clear that most of the development likely to take place in Harrow over the next 15 years will be residential, or residential-based mixed use schemes. Of 6,050 new homes and 4,000 additional jobs, 46% of the housing and 75% of the jobs are expected to be within the area of the Harrow and Wealdstone AAP. Twenty-eight percent of the land area of the borough is green belt or metropolitan open land. A considerable further proportion is open space. The Core Strategy makes it clear that development is not wanted on GB, MOL, open space or greenfield land, including garden land, and that development should only take place on sites designated in the Site Allocations DPD (Local Plan) or as windfalls on previously developed land, largely in the form of redevelopments in shopping parades or employment areas.
37. These observations suggest that the scope of the development which the DMPLP would have to deal with would be limited, largely to residential extensions and conversions and to small redevelopments in commercial or employment areas. It was therefore hard to understand the justification for a document of over 250 pages, containing 62 policies.
38. Further analysis by the Council of the expected quantities and type of development to which the DMPLP would be expected to apply confirmed that in some cases policies would be expected to have limited or no relevance. The Council proposed, and I endorse, the deletion of a number of unnecessary

policies and a major edit of chapter 3 of the plan. Without losing any significant content, which would have required a further Sustainability Appraisal, these changes focus the plan on realistic development pressures and so are necessary to bring it into compliance with that part of NPPF paragraph 154 (**MMs 77 to 114 inclusive, 213, 398 and 399**).

39. NPPF paragraph 154 goes on to require Local Plans to set out clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. These are essential to the effectiveness of the plans, to which I now turn.

Issue 3 - Effectiveness

40. The sheer size of the DMPLP cast doubt upon its effectiveness because it would be a sizeable task for any developer of the small scale or householder proposals likely to be the subject of the plan to form a clear indication of how many of the 62 policies would in fact apply in any particular case. There are examples of duplication and overlap between policies which caused confusion and require modifications, a number of which "signpost" cross-references to policies in other documents (**MMs 29, 41, 46, 47, 50, 55, 63, 76, 78, 79, 85, 86, 92, 96, 98, 100, 102, 103, 108, 109, 110, 113, 114, 128, 138, 148, 156, 159, 162, 170, 177, 196, 197, 201, 205, 206, 212, 214, 218, 219, 223, 224, 225, 226, 230, 231, 233, 234, 235, 237, 241, 242, 245, 247, 251, 255, 264, 265, 274, 275, 281, 282, 285, 291, 293, 298, 299, 305, 306, 307, 314, 315, 316, 323, 329, 330, 337, 339, 349, 354, 358, 363, 365, 366, 374, 378, 379, 385, 387, 393, 395, 397 and 400**).
41. In addition, the material which is labelled "Reasoned justification" in fact included much material which is a statement of policy. In some cases, this simply reiterated material which was stated in the policies themselves but, in other cases, it stated additional or expanded policy. This exacerbated the difficulties of obtaining a clear indication of how a decision maker would react to a development proposal. Modifications are necessary to delete duplication and to bring policy statements within the scope of stated policies (**MMs 6, 7, 8, 9, 10, 15, 16, 18, 19, 20, 21, 23, 24, 25, 28, 30, 33, 35, 36, 37, 38, 39, 40, 44, 45, 48, 49, 51, 52, 53, 54, 56, 57, 58, 59, 60, 61, 62, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 80, 82, 83, 84, 89, 92, 93, 95, 96, 97, 98, 99, 100, 102, 103, 107, 111, 112, 114, 115, 116, 117, 121, 124, 125, 126, 127, 129, 130, 131, 132, 134, 135, 136, 137, 139, 140, 141, 142, 145, 146, 147, 149, 150, 151, 152, 154, 155, 158, 160, 161, 166, 167, 169, 171, 172, 173, 174, 175, 176, 178, 179, 180, 181, 182, 183, 184, 185, 186, 189, 190, 191, 192, 193, 194, 195, 198, 199, 200, 202, 203, 204, 208, 209, 210, 211, 217, 220, 221, 222, 226, 228, 229, 232, 234, 236, 238, 243, 246, 248, 249, 250, 252, 253, 254, 256, 259, 260, 261, 262, 263, 266, 269, 270, 271, 272, 273, 277, 278, 279, 280, 288, 289, 292, 294, 295, 296, 297, 299, 300, 301, 302, 303, 307, 308, 309, 310, 311, 312, 317, 318, 319, 320, 321, 322, 324, 325, 326, 327, 328, 331, 332, 333, 334, 335, 336, 338, 340, 341, 342, 343, 344, 345, 346, 347, 348, 350, 351, 353, 357, 360, 361, 364, 367, 368, 369, 370, 371, 372, 373, 376, 377, 379, 380, 381, 382, 383, 384, 386, 387, 388, 389, 390, 392 and 396**).

42. In a few instances, this additional material made reference to geographical areas of the borough where discrete policies would apply but, because they would cause a confusion of overlaying policy designations, they would not be shown on the printed policies map. The Council intended that they would be shown as a layer on the on-line version of the map but not everyone has access to this. Modifications require their inclusion as a diagram associated with the relevant policy (**MMs120, 203 and 244**) and to alert readers of the policies map accordingly (**MM405**).
43. In other places, the reasoned justification included much material which is explanatory. This material gave helpful advice on how to understand or comply with a policy, without appearing to be policy as such. It is the kind of material that would normally have appeared in a supplementary planning document. This material would be helpful to a reader but because it was included indistinguishably with material which was really a policy statement and material which was genuinely justification, a great confusion resulted. This prejudiced the effectiveness of the plan. Modifications eliminate this unnecessary material (**MMs 1, 5, 12, 13, 18, 33, 34, 40, 77, 87, 88, 90, 91, 94, 95, 99, 101, 104, 107, 111, 112, 114, 119, 134, 137, 144, 146, 153, 154, 165, 167, 168, 190, 200, 207, 210, 217, 228, 243, 248, 249, 254, 260, 262, 268, 269, 280, 286, 290, 360, 362, 381, 388, 390, 392, 394, 396, 401, 403 and 404**).
44. In twenty-two instances in the DMPLP, policy is stated which requires developers to submit a self-assessment of one or more aspects of the impact of a development when making a planning application. These appear to be administrative policies for validating planning applications rather than policies governing development. Although this material might be helpful to a reader, it would more normally be expected to be included within an authority's statement of its information requirements for validating a planning application, than within a DPD (Local Plan). Validation requirements are in any event the subject of Statutory Instruments. They do not, of themselves, tell a developer what will or will not be permitted and where, nor how a decision maker should react to a development proposal, and so their inclusion would not comply with paragraph 154 of the NPPF (**MMs 37, 43, 81, 90, 114, 121, 122, 123, 137, 150, 163, 195, 217, 254, 260, 288, 317, 342, 344, 359, 362, 387, 392 and 396**).
45. In a few cases, such policies went beyond the simple administrative requirement for the submission of an appraisal at the time of making a planning application and made clear the functional characteristic required of development which an appraisal would be intended to demonstrate. However, even these policies appeared to imply that it would be sufficient for a developer to submit such a self-appraisal in order to obtain a planning permission. Modifications, which I endorse, make it clear that it is for the Council to evaluate such appraisals and to determine the acceptability of a development proposal (**MMs 123, 136, 164, 253, 256, 287, 350 and 402**).
46. In some cases the removal of material labelled justification which was no more than a repetition or elaboration of policy revealed a lack of justification. The Council responded with a number of modifications to make good this deficiency (**MMs 3, 4, 11, 14, 17, 18, 20, 22, 26, 31, 32, 34, 35, 37, 40,**

43, 97, 106, 111, 112, 118, 131, 133, 143, 147, 150, 157, 158, 179, 182, 183, 184, 185, 187, 191, 192, 195, 210, 215, 216, 226, 232, 235, 239, 240, 246, 254, 257, 258, 261, 262, 263, 267, 276, 294, 295, 300, 303, 304, 312, 313, 318, 321, 322, 327, 340, 341, 342, 347, 348, 352, 353, 356, 357, 361, 369, 371, 372, 376, 380, 382, 383, 390, 391 and 396,). Again these are endorsed and appended to this report. One of these modifications revealed a need to amend a policy for greater clarity. (**MM355**) Because they do not alter the substance of the plans but merely correct the absence of justification, no further Sustainability Appraisal is required.

47. To a lesser extent, chapter 4 of the AAPLP displayed the same characteristics as described above and so too did not comply with paragraph 154 of the NPPF. The council responded with a thorough edit of chapter 4 of the AAPLP. This has led to the vast majority of the Modifications to the AAPLP which are endorsed and appended to this report. All are necessary to achieve clarity in accordance with NPPF paragraph 154 and effectiveness in accordance with NPPF paragraph 182. They also succeed in achieving a considerable reduction in the volume and complexity of the AAPLP, so improving its accessibility to users and removing barriers to effectiveness.
48. Modifications **MM601, 602, 603, 604, 620, 638, 639, 645, 659, 668, 670, 671, 687 and 723** are necessary to remove outdated or superfluous material. Modifications **MM605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 622, 623, 624, 625, 626, 628, 630, 632, 633, 635, 636, 637, 644, 645, 647, 648, 649, 650, 651, 652, 653, 654, 656, 657, 658, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 702, 703, 705, 706, 707, 708, 709, 710, 711, 712, 714, 716, 717, 718, 719, 720, 721, 724, 725, 727, 728, 730 and 731** are necessary to remove policy statements from justificatory text and to include them within stated policy. Modifications **MM607, 612, 615, 616, 618, 621, 624, 627, 628, 631, 632, 633, 634, 635, 637, 640, 641, 642, 644, 648, 655, 661, 665, 669, 671, 672, 673, 674, 678, 679, 683, 687, 688, 691, 696, 703, 704, 708, 709, 715, 719, 724 and 728** are necessary to make good deficiencies in stated justification. Modifications **MM629, 701, 713 and 714** resolve overlaps with the DMPLP, providing cross-references. Modifications **MM643, 645, 660, 661, 662, 668, 687, 689, 694, 722, 726, 729 and 732** remove validation requirements in the guise of development management policies.
49. Representations from the public, as well as my own examination gave rise to other issues of justification, to which I now turn.

Issue 4 – Justification

50. As the second bullet point of NPPF paragraph 182 explains, I need to be satisfied that the plan should be the most appropriate strategy, when considered against reasonable alternatives. The strategy for managing growth in Harrow is established in the Core Strategy following consideration of alternative growth options that were documented and rejected through the sustainability appraisal and consultation process and subsequently found sound.

51. The three DPDs (Local Plans) the subject of this examination apply the adopted strategy. Nevertheless alternative approaches to its application have been considered both in the preparation of the three local plans and in the consultation which has occurred on them. These are documented in the Issues and Options documents, Sustainability Appraisals and other documents listed in the evidence base. For example, table 17 and Appendix F of the Harrow Retail Study (2009) identified 27 potential retail development sites in the Borough. Paragraphs 17.11-17.13 of the study explain the methods used in their identification and rating. As paragraph 2.5 of the SALP explains, only those rated with good or reasonable prospects were included in the Local Plan. Other potential allocation sites which were rejected are documented in the Sustainability Appraisal. I therefore have no reason to doubt that the three Local Plans represent the most appropriate choices when considered against reasonable alternatives.

A Housing

52. As submitted, policy DM32 A a of the DMPLP gave priority to the delivery of family housing. Justification in paragraph 6.12 referred to the London Plan and the West London SHMA. Yet paragraph 6.16 of the DMPLP reported that three-bedroomed family homes are in surplus and that 2-bedroomed homes are in deficit. So the evidence contradicted the policy. Furthermore, policy DM34 a allowed for the conversion of family houses to multiple units without reference to the need for family housing, so appearing to work against policy DM32 A.
53. The Council proposes a modification to policy DM32 to make it clear that the priority is for the delivery of affordable family housing, not family housing in general (**MM227**). Further modifications summarise the evidence of the West London SHMA and explain why the Council does not wish to have a policy over the type and size of new housing to be provided in the private sector (**MM228**). As these modifications are clearly evidence-based, I endorse them.
54. A consequence of the decision, noted earlier, to provide new housing for only a percentage of the forecast growth in population is to direct demand towards the conversion to housing of existing non-residential property and towards the subdivision of existing residential property. Questioning of the rigour of the Council's standards for conversions led to a number of modifications accepting the need to be pragmatic in response to the circumstances of individual buildings but also setting out with greater cogency the justification for high standards (**MMs 27, 232, 234, 235**).
55. The Council also provided evidence to demonstrate that recent raising of standards through its Residential Design Guide December 2010, anticipating the introduction of the three Local Plans, has not led to a reduction in the numbers of converted homes delivered over and above the reductions experienced as a consequence of the difficulties of the wider economy. With this assurance, I concur with the need for the modifications proposed.
56. In the Site Allocations DPD (Local Plan) a number of site allocations are annotated to the effect that they would be suitable for residential use only. Although they are all clearly suitable for residential use, no evidence is adduced to justify the requirement that they be only so developed. A series of

modifications is put forward to delete the requirement (**MMs 511, 513, 516, 517, 523 and 525**). I agree that these are necessary to confirm the soundness of the plan.

57. As noted above, the Council's enthusiasm for identifying potential development sites sometimes overreached itself. Representations alleged that some landowners were unaware that their sites were identified as site allocations. Requests to the Council to verify the likely availability of these sites during the lifetime of the plan demonstrated that it was unable to do so in the case of two sites in the SALP (H3 and H10) identified for housing-led redevelopment. The inclusion of these two sites might therefore be misleading and potentially unsound. Modifications are therefore necessary to delete these allocations (**MMs 512 and 521**). Other responses led to Council to consider pro-active intervention (**MMs 515 and 527**) on other sites.
58. The Council also proposes some modifications to reflect the fact that some allocations have now been taken up and developed (**MMs 175A and B, 518, 529, 531 and 737**) and to record recent events relevant to the allocations (**MMs 514, 519, 524, 526, 530, 534, 535 and 536**). These are clearly necessary to reflect the facts of the situation. However, the three plans' overall provision for housing development would continue to exceed the targets of the London Plan and the Core Strategy as the modified and corrected summaries show (**MMs 503A, 506, 510, 510A, 528, 532, 537, 537A, 538, 539, 540 and 541**), so the deletions would not compromise the overall effectiveness of the three plans.
59. The owners of the Royal National Orthopaedic Hospital (site GB2) reported that the indicative housing capacity for that site provided insufficient enabling development to make viable the current proposals for the redevelopment of the hospital. Although a current planning application sought permission for a much larger number and did not appear to raise fundamental issues, it had not reached a stage where the Council regarded it as sufficient evidence to justify proposing a modification to the plan. Because the Council and the landowners are clearly working together to reach agreement on an acceptable and viable proposal for the site, it is clearly a development site which should remain as an allocation in the plan. The numbers included in the details of site allocations are indicative and do not preclude larger numbers if achievable but at present that has not been demonstrated so it would be inappropriate to require a modification to the allocation.
60. Several housing sites are currently in use as Underground station car parks. Representations alleged that their retention is necessary as part of a strategy to manage passenger flows to and from Wembley Stadium on event days. Information from TfL confirms that the sites in question will be made available for development during the plan period; that any detriment to the operational standards of the Underground stations resulting from the loss or reduction in car parking capacity will be minimised and that the car parks in question do not form part of any TfL strategy for handling passenger flows to or from Wembley Stadium on event days. Based on these assurances, I conclude that the retention of these sites within the SALP would be sound without modification.

B Employment policies

61. Neither my own examination nor representations received raised major issues of soundness related to employment policies. Modifications are necessary to clarify that it is the impact of a development, not whether a self assessment of that impact is made, which would determine the acceptability of a proposal. Other modifications to clarify the significance of viability are also necessary to bring the policies in line with national policy (**MM253, 256**).

C Employment Sites

62. As noted above, the Council's enthusiasm for identifying potential development sites sometimes overreached itself. Representations alleged that some landowners were unaware that their sites were identified as site allocations. Requests to the Council to verify the likely availability of these sites during the lifetime of the plan demonstrated that it was unable to do so in the case of three sites in Edgware identified for employment-led redevelopment. As there is no evidence to justify their designation as development sites, their inclusion in the plan would be possibly misleading and therefore, unsound. Modifications therefore exclude their designation (**MMs 507, 508 and 509**).
63. These modifications would remove 18.8% of the gross indicative employment floorspace identified in the SALP (**MM510**). Net figures are not identified but as the contribution of employment sites in the area of the SALP is only expected to be about 25% of the overall total for the borough, the overall reduction in the number of jobs expected to result from the allocations in the three local plans would be much less; about 4.7%, insufficient to undermine their overall effectiveness.

D Surplus police stations

64. Representations were made to the effect that two surplus police stations should be the subject of specific site allocations. Since Harrow police station currently remains operational, I am not convinced that the inclusion of a specific site allocation within the plan would be appropriate. In respect of Wealdstone, both the Council and the landowner agree that no certain information is available to determine what mix, type or quantity of development would be feasible or viable in the context of the constraints on the site, including its designation as a Grade II listed building. Without this information, no allocation within the AAPLP can presently be justified. In respect of these two sites, I therefore conclude that the plans as submitted are sound.

E Pubs

65. As submitted, policy DM45 would not permit the redevelopment or change of use of purpose-built pubs unless it would support the evening economy in town centre locations, provide community uses or the pub was no longer economically viable. The reasoned justification explained that pubs were valuable in promoting social cohesion and in bringing communities together but experience showed that purpose built pubs, whether in town centres or in residential areas were seldom converted to other class A uses in accordance

with the General Permitted Development Order but were redeveloped for residential use. The reason for the policy was to safeguard their potential for preferred alternative uses against speculative redevelopment proposals.

66. However, the justification went on to acknowledge that although evening economy uses would be appropriate in town centres, they would be unlikely to be compatible with amenity in residential areas. This observation, if factually correct, is inconsistent with the retention of public houses within residential areas, since they are, of their nature, an aspect of the evening economy.
67. The council's suggested resolution of this inconsistency is to modify the plan by deleting this policy and its justification from chapter 7 of the DMPLP (**MM282**) and encompassing the issue within policy DM58 in Chapter 10. This provides criteria for safeguarding all types of community facility, simply adding a requirement for a period of marketing in the case of public houses.
68. Although this modification correctly focuses on the fact that other community uses share with pubs, to a degree, the same pressures and demands which lead to obsolescence and pressures for their closure and redevelopment, it does not adequately resolve the dilemma. A more discerning policy is required to resolve the balance between the advantages and disadvantages of retention or redevelopment. Recent changes in legislation and regulations, such as the requirement for an external smoking area and the development of ever more powerful amplification devices have made some community uses, including pubs, even less compatible with residential uses than before. A revised policy needs to recognise this.
69. On the other hand, reasoned justification in paragraph 7.62 of the DMPLP sets out the value that pubs, like other community uses, can have. Yet not all community uses possess these desirable characteristics. Some have them to varying degrees. The value of a community use is, in part, related to the degree to which it possesses these attributes. A revised policy needs to recognise this. I have therefore adjusted the Council's suggested modifications accordingly (**MMs 375 and 377**).

F Retail allocations

70. Representations challenged the sufficiency of the allocations for retail development, arguing (i) that population forecasts outstripped housing figures and would lead to greater demand for retailing than provided for, and (ii) that because most allocations within the AAPLP did not give target outcomes for retail floorspace, there was no guarantee that the figures set in the Core Strategy would be met.
71. However, as noted above, the Core Strategy follows the London Plan in making a conscious decision not to accommodate forecast population growth within the Borough but to provide for it elsewhere in London. This necessarily limits the potential for retail growth in the Borough.
72. In its Statements of Representations on both the DMPLP and the SALP the Council includes a note on the pipeline of retail floorspace as at October 2012. This has been updated as a result of the modifications subsequently proposed. As thus adjusted, it shows that sites with planning permission, together with

sites allocated in the SALP and the AAPLP would be capable of providing for 37874 sq m of the 44173 sq m which the Harrow Retail Study forecasts to be needed by 2025.

73. This represents a shortfall of 14.25% but remains well in excess of the 29097sq m forecast to be needed by 2020. The Harrow Retail Study warns that forecasts for the period beyond 2020 should be used with caution and so the Council contends that the 2020 figures should be used as the basis for allocating sites in the Local Plans. It proposes modified text to justify this approach (**MMs 283 and 704**).
74. Plans ought to provide an appropriate basis for the planning of the Borough over the next 15 years. Although the allocations in the SALP and AAPLP are insufficient to do so, the DMPLP contains policy criteria for permitting retail developments over and above the allocated sites. In combination therefore, the three DPDs (Local Plans) would be fit for the purpose of planning additional retail floorspace. The proposed modifications are necessary to explain the rationale for this approach. I add a further modification to paragraph 1.1 of the SALP for consistency (**MM501**).

G The sequential test for retail development

75. Paragraph 8.5 of the DMPLP contained an oversimplified summary of paragraph 26 of the NPPF. In consequence the justification by reference to the NPPF, set out in paragraph 8.11, for requiring retail impact assessments for edge and out of centre locations in policy DM46 B d and the unnumbered passage following DM 46 A b constitute an invalid, circular argument and require modification.
76. The NPPF recommends that impact assessments should be required for developments outside of town centres which are not in accordance with a Local Plan. There was no stated justification for the more demanding requirement included in the submitted DMPLP for an impact assessment in all cases of edge or out of town developments, even those complying with the Local Plan.
77. On the other hand, advice in paragraphs 23 and 24 of the NPPF is that site allocation should follow the sequential test and be based on an assessment of need. That way, the size of any proposed development, whether in town, edge of town or out of town can be seen to be proportionate to the needs of the town in question.
78. The evidence of the need for retail growth in Harrow has not been disaggregated to the level of individual town centres. It therefore follows that the quantity of retail development to be sought, even on designated sites within town centres, cannot be stated. The Site Allocations DPD (Local Plan) refers to "potential retail floorspace" for each allocated site, based on estimates of site capacity. It does not prescribe the quantity to be provided based on any centre-specific estimate of need. It follows that an impact assessment is therefore required in all cases. Modifications to policy DM46 and its justification are therefore necessary to make this clear. (**MMs 284, 285 & 287**).

H Retail sites

79. A number of representations cast doubt upon the justification for the selection of sites allocated in the SALP for retail development, either in terms of their timing or their viability. Although pre-submission modifications addressed some of these points in relation to site R1 (Land between High Street and Love Lane Pinner), subsequent enquiries by the Council failed to establish the likely availability of this site and site R6 (land at the junction of Kenton Road and Honeypot Lane, Kingsbury) during the lifetime of the plan. Consequently, modifications propose these for deletion (**MMs 504, 505 and 506**). In relation to most of the others, the Council provided information of discussions with landowners, planning applications or permissions to show that the allocations were justifiable.
80. The most convincing of the representations concerned site R4 (the North Harrow Methodist Church). It was apparent that the site had been identified without consultation with the landowner, to whom the allocation came as a surprise. The church is flourishing and has its own plans to expand its function as a community centre. It is part of a Methodist circuit for which a review of need for premises had been carried out fairly recently, in 2007. It was unlikely that the church would have released its site of its own accord. Nevertheless, now that the potential of the site had been brought to their attention, church representatives recognised that, in the longer term, retail development could provide funding to enable their aspirations for expansion to occur, so it suited them to retain the allocation within the plan. I have no reason to disagree.
81. One representation promoted the Northolt Retail Park as a readily available location to accommodate additional and replacement retail sales of a convenience or comparison nature. The location is that of an already-developed retail park near to South Harrow District Centre. However, other than a generalised location identified by name, there is no information to demonstrate the feasibility of any specific proposal. Nor has any specific proposal been the subject of public consultation, Sustainability Appraisal or impact assessment made known to me. Accordingly, I am unable to assess this suggestion further.
82. Although the suggestion might help to make good the shortfall in allocated sites, acknowledged above, so might other sites yet to be put forward. For the reasons noted earlier, I am content that the plans would be sound without identifying sufficient sites to take up the full range of identified retail capacity because policies are in place to evaluate additional proposals as they are made.

I Designated frontages

83. Site Allocation RF01 proposes to adjust the designations of primary and secondary retail frontages within South Harrow District Centre. Numbers 273 to 295 (odd) Northolt Road would be transferred from a secondary designation to a primary designation. A representation challenged this designation, arguing that the South Harrow District Centre should instead be extended northwards to include frontages and the Northolt Road Retail Park not presently included in the District Centre at all.

84. A visit to the area confirmed the justification for the redesignation of 273-295 Northolt Road set out in paragraph 2.27 of the SALP. It also showed that the frontages to Northolt Road north of the existing defined District Centre were largely in non-retail use and clearly separated the Northolt Road Retail Park from the District Centre. These findings do not suggest that the relevant provisions within the SALP are anything other than sound.

J Open space

85. In the DMPLP, policies DM25, dealing with the protection of existing open space, and DM26, dealing with the creation of new open space are soundly based on the evidence of the Council's Open Space PPG17 Study. Neither requires modification other than to correct the terminology of subsection B d, which gave rise to doubts about the intentions of the policy (**MM188**).
86. Representations sought to ensure that planning permissions could never be given in conflict with either policy but it is a matter of law that in dealing with an application for planning permission the authority shall have regard to (a) the provisions of the development plan, so far as material to the application, (b) any local finance considerations, so far as material to the application, and (c) any other material considerations. These provisions cannot be overridden by any policy within a Local Plan and so the plan is sound without any modification.
87. Representations were also made against the allocations of site G03 (in the SALP) and AAP02 (in the AAPLP) on the grounds that they involve the use of existing open space. Both sites are the subject of existing permissions for development, not yet implemented, and the site allocations reflect the permissions which have been given. The Council argued that development of site AAP02 in accordance with the allocation would result in an increase in the amount of open space provided on the site.
88. Although it is accepted that the development of site G03 would be contrary to policy DM25, in the same way that the extant planning permission was accepted as contrary to existing UDP policy for the protection of open space, there has been no change in the other material considerations which led to the previous decision and so no reason now to propose a different allocation for the site. Subject to the correction of minor errors in the delineation of the site (modification **MM533**) there is no reason to find the SALP unsound in relation to this proposal.
89. Adjacent to site G03 is a small piece of land, occupied by a scout hut. There is a dispute between the Council and the site owners as to whether this should be included within an open space designation (and so subject to policy DM25) or should be excluded from the open space designation and be simply subject to policy DM58 (retention of existing community, sport and education facilities). Policy DM 58 would probably apply in any event but, given the circumstances under which the scout hut came to be developed in the first place, it is not unsound to regard it as an ancillary development on open space, even though it is now fenced off from the rest of the open space and so provided with its own curtilage. Accordingly, no modification is needed to make the plan sound.

90. Representations challenged site allocation MOS4 (Glenthorne, Common Road, Stanmore) on a number of grounds including lack of need and underutilisation of adjoining open space, need to protect uncommon species and habitats from human impact, hazards to the public and lack of funding. For the most part, these are matters of detail which would be resolved during the implementation of any proposal. The principle justification for allocating the site lies in the Council's PPG17 Open Space Study, which demonstrates the need for additional open space to serve the borough, and in the observation that additional open space can only be provided where it is found. Without denying the validity of the implementation points, the justification in principle does not lead me to find the allocation, or the plan, unsound.
91. Testing of the provisions of each allocation revealed that the reference to a Green Grid contribution for one site had no justification and so the provision is proposed to be deleted (**MM522**).

K Views

92. As the Core strategy points out, Harrow Hill and Harrow Weald Ridge are dominant topographical features within the landscape of the borough. Views and glimpses of these features are enjoyed from many areas and for many residents they are a cherished component of local character. Four Core Strategy policies relate to the protection of views. The provisions of the DMPLP and AAPLP which give effect to those policies include a Schedule of Protected Views which extends to about ten per cent by page number of the content of the DMPLP. These provisions were the subject of considerable public interest during the examination of the three local plans.
93. Although some representations initially questioned the methodology used to define the views, by the time of the hearing sessions it was accepted by all participants as the best and most appropriate methodology available. A site visit to the viewpoint of one contested view did not convince me that it had been incorrectly defined.
94. Debate focussed more on the policy which would be applied to the defined views. It became apparent during the examination and particularly during the hearing sessions that there was a tension between the policy as stated and its application in practice, to one site (18 in the AAP) in particular.
95. As stated, the policy did not recognise the possibility that a new development falling within the protected zone of an identified view could be of such outstanding quality that it could itself contribute positively to the characteristics of the view. Yet such had been the practice, recognised in an appeal decision and endorsed in the Core Strategy. Although some participants felt strongly that this principle undermined the concept of protected views, it would be unsound if the three local plans were inconsistent with policy as applied in practice, endorsed on appeal and confirmed within the Core Strategy. Modifications are therefore necessary to achieve soundness in this respect (**MMs 42 and 44**).
96. The three Local Plans are concerned not only with views of tall buildings but also with views from tall buildings. Evidence was submitted which demonstrated the difficulties of providing publicly accessible viewing platforms

in all tall buildings as a matter of routine. The Council acknowledges the substance of these concerns and proposes a modification accordingly (**MM646**).

L Sites within Harrow and Wealdstone Intensification Area

97. Chapter 5 of the Area Action Plan DPD (Local Plan) contains illustrative diagrams showing how each site within the Intensification Area might be laid out. They are not meant to be prescriptive (which is stated in the document but would be made clearer by modifications (**MMs 635 and 734**) proposed by the Council) but they are intended to demonstrate the feasibility of, and so justify, the provisions of each site allocation. It was asserted, without contradiction, that most of these are based either on extant permissions, schemes under discussion, or feasibility studies prepared by, or in agreement with, the landowners of the sites in question.
98. The exception is that for site 18. In this instance it is accepted that there is no extant detailed permission or scheme in preparation which demonstrates the feasibility of developing this site in the way indicated.
99. There is no doubt about the availability of the site for development (its several owners confirm the fact). Nor is there any suggestion that the quantitative provisions of the allocation could not be met. However, in the absence of any evidence to demonstrate that the illustrative diagram accompanying the site allocation is realistic, its retention within the plan cannot be justified. It could be misleading and so, unsound. Modification **MM739** therefore deletes it.
100. Representations raised issues concerning the traffic generated by the development of AAP site 3 (the former teachers' centre). The Council points to submitted evidence (the Harrow Area Action Plan Phase II; Traffic Impact Assessment by TfL with support from SKM Colin Buchanan). This shows that development of this site is likely to contribute about 7% of the total additional morning peak hour traffic generated by the whole AAPLP and only 1.3% of the evening peak increase. The overall effects of the AAP are expected to be a 3% drop in average road network speed but mitigation measures are available to counteract this effect. This evidence does not suggest that the AAP as a whole, or this site allocation in particular, would be unsound.
101. Representations raised issues concerning the viability of one component of the mixed uses proposed on the ColArt site (AAP site 4) but the Council points out that the component is not a required element of the site's development but merely indicated as an acceptable element. A modification (**MM733**) makes this clear.
102. With this modification in place and others to correct errors or inconsistencies (**MMs735, 736, 738, 740 and 741**) and delete implemented schemes (**MM737**) I have no reason to find the site allocation diagrams or the Plan as a whole unsound.

M Kenton Lane Farm

103. Prior to the hearing sessions, this site had generated more representations, including a substantial petition, than any other provision of the plans. None of

those who made representations either attended the hearing session or provided written evidence to substantiate their concerns. Assurances were given, both by the Council and by representatives of those who wished to pursue the proposal with a planning application, that earlier public concern was based on a misunderstanding of the nature of the proposal, which had now been resolved through more recent public consultation. I have no evidence to contradict that advice. Submitted evidence supports the proposal and so I find the proposal sound, subject to corrections of errors in the details included in the submitted SALP (MMs 535 and 536).

Assessment of Legal Compliance

104. My examination of the compliance of the Plans with the legal requirements is summarised in the table below. I conclude that the Plans meet them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Development Management Policies, Site Specific Allocations and Harrow and Wealdstone Area Action Plan DPDs (now Local Plans) are identified within the approved LDS July 2012 which sets out expected adoption dates of April 2013. The Development Management Policies, Site Specific Allocations and Harrow and Wealdstone Area Action Plan DPDs (now Local Plans)' contents are compliant with the LDS. Their timing has been delayed slightly by the need to advertise modifications but is otherwise compliant with the LDS
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in August 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations HRA has been carried out and is adequate.
National Policy	The Development Management Policies, Site Specific Allocations and Harrow and Wealdstone Area Action Plan DPDs (now Local Plans) comply with national policy except where indicated and modifications are recommended.
London Plan	The Development Management Policies, Site Specific Allocations and Harrow and Wealdstone Area Action Plan DPDs (now Local Plans) are in general conformity with the London Plan.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Development Management Policies, Site Specific Allocations and Harrow and Wealdstone Area Action Plan DPDs (now Local Plans) comply with the Act and the Regulations.

Overall Conclusion and Recommendation

- 105. The Plans have a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of them as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.**
- 106. The Council has requested that I recommend main modifications to make the Plans sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendices the Development Management Policies, Site Specific Allocations and Harrow and Wealdstone Area Action Plan local plans satisfy the requirements of Section 20(5) of the 2004 Act and meet the criteria for soundness in the National Planning Policy Framework.**

P. W. Clark

Inspector

This report is accompanied by three Appendices containing the Main Modifications to each Local Plan

Appendix A– DMPLP Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, including the minor modifications submitted at the time, and do not take account of the deletion or addition of text. Policies are prefaced DM in this appendix, although not so prefaced in the submitted document.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	6	1.8 to 1.18	<i>Delete paragraphs 1.8 to 1.18</i>
MM2	38	1.20	<p><i>Delete paragraph 1.20 and heading and substitute;</i></p> <p><u>1.20 Cutting across all thematic policies is the presumption in favour of sustainable development contained within the government's National Planning Policy Framework. This requires that:</u></p> <p>a) <u>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</u></p> <p>b) <u>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</u></p> <p>c) <u>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</u></p> <ul style="list-style-type: none"> • <u>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</u> • <u>Specific policies in that Framework indicate that development should be restricted.</u>
MM3	10	2.2	<i>Insert after first sentence; <u>The dominant housing typologies in</u></i>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>Harrow are two storey detached, semi detached and suburban terraced properties with front and rear gardens. These housing typologies provide streets and neighbourhoods with a strong coherent appearance due to the consistent and rhythmic architectural style and consistent street profile. The Character Assessment-</u>
MM4	10	2.2	<i>Insert before last sentence; The policies in this chapter seek to achieve a high standard of design and layout which preserves and appropriately enhances the quality of the Borough's built environment, outside of the Harrow & Wealdstone Intensification Area^[Footnote], integrates with the neighbourhood of which it will form part, whilst enabling effective use to be made of previously developed land. And add footnote; Policies to deliver a new, high quality and sustainable urban form within the Intensification Area will be contained within the Harrow & Wealdstone Area Action Plan.</i>
MM5	10	2.3 to 2.6	<i>Delete paragraphs 2.3 to 2.6</i>
MM6	11	DM1	<i>Amend part B b to read; the appearance of proposed buildings, including but not limited to architectural inspiration, detailing, roof form, materials and colour, entrances, windows and <u>the discreet accommodation of</u> external services;</i>
MM7	11	DM1	<i>Amend part B f to read; the functionality of the development including but not limited to <u>the convenience and safety of</u> internal circulation, parking <u>and servicing (without dominating the appearance of the development)</u> and <u>the appearance, capacity, convenience, logistics and potential nuisance of</u> arrangements for waste, recycling and composting; and</i>
MM8	12	DM1	<i>Insert after part D b; <u>c the distances between facing windows to habitable rooms and kitchens; and redesignate succeeding parts c-h as d-i.</u></i>
MM9	12	DM1	<i>Add to parts D c, d and e (now parts D d, e and f); <u>(applying the Council's 45 degree code where relevant);</u></i>
MM10	12	DM1	<i>Insert after "buildings" in part D e (now D f); <u>(habitable rooms and kitchens)</u></i>
MM11	12	2.7	<i>Amend paragraph 2.7 as follows; <u>The Core Strategy sets out the overarching strategy for ensuring new developments are of high quality design and do not impact on residents' amenity. Policy DM1 provides further details on the key elements of good design, layout and amenity that need to be considered for all scales of development ranging from major development schemes to residential extensions and conversions. As much of Harrow's built environment approaches its centenary, it continues to offer a high quality of life for residents and a good place for local business and learning. The Borough's classic 'Metroland' pattern of suburbs and centres also places Harrow in a strong position to achieve more accessible, sustainable lifetime neighbourhoods. New development and changes of use proposals offer the potential to strengthen the valuable components of the Borough's existing built environment whilst realising the opportunity of previously-developed to meet</u></i>

Ref	Page	Policy/ Paragraph	Main Modification
			future housing and economic needs without loss of open space. To this end, the Council will seek to achieve a high standard of development in terms of design, layout, privacy and amenity. Planning applications which fail to achieve a high standard, or which are detrimental to privacy, amenity, character and appearance, will be refused.
MM12	12	2.8	<i>Delete paragraph 2.8</i>
MM13	12	2.9	<i>Delete paragraph 2.9</i>
MM14	13	2.11	<i>Amend third sentence to read;</i> However this need not mean rigid replication of existing architectural styles; modern interpretations based on a demonstrable appreciation of design <u>local context</u> can introduce exciting new forms and, where appropriate, add variety and interest.
MM15	13	2.12	<i>Amend as follows;</i> Quality of execution is key to the realisation of design success, and in this regard the Council will exercise control of materials, colour, entrance & window details, Amendments that diminish the design quality of an approved scheme will not be accepted. external services and telecommunications equipment can significantly detract from a building's finished appearance, particularly in <u>mixed use and multi-occupancy developments,</u> and should therefore be discreetly accommodated as part of the design process at the outset
MM16	13	2.13	<i>Delete last sentence</i>
MM17	13	2.14	<i>Preface with;</i> <u>The design of the spaces between buildings, both private and public, are key to the quality of the environment and the experience of those who use them. This includes hard and soft landscaping, natural features, boundary treatments, waste and cycling enclosures.</u> <i>And delete last four words of paragraph</i>
MM18	14	2.15	<i>Delete first five sentences and substitute;</i> <u>Landscaping should be included as an integral part of the overall design of a development proposal. The landscape and buildings need to be considered together from the start of the design process and careful consideration given to the existing character of the site including its typology and existing trees and landscape.</u> <i>Add additional sentence;</i> <u>Further detail on trees and landscaping, and what is required in landscaping plans, is provided in Policy DM30 (Trees and Landscape).</u>
MM19	14	2.16	<i>Delete paragraph 2.16</i>
MM20	14	2.17	<i>Delete second, third and fourth sentences and substitute;</i> <u>As set out in the Core Strategy, these areas are therefore sensitive to the development of taller buildings that, by their very nature are likely to have a greater impact on their surroundings with regard to visual impacts and effects on the local environment including microclimate, overshadowing and character.</u>
MM21	14	2.18	<i>Delete paragraph 2.18</i>

Ref	Page	Policy/ Paragraph	Main Modification
MM22	15	2.19	<i>Amend as follows;</i> The standard of privacy and amenity achieved by development will be closely related to the application of design and layout considerations set out above. <u>Protecting privacy and amenity helps to protect the well being of the Borough's residents. Development must create successful, usable space for</u> This concerns the need to protect both future occupiers of new development, as well as but this should not be at the expense of other planning considerations, including the living conditions of neighbouring occupiers or (for mixed use development) the viability of business premises.
MM23	15	2.20 to 2.21	<i>Delete paragraphs 2.20 and 2.21</i>
MM24	15	2.22	<i>Delete last two sentences</i>
MM25	15	2.23	<i>Delete last two sentences</i>
MM26	15	Following 2.23	<i>Insert new paragraph;</i> <u>The Residential Design Guide SPD sets out the Council's 45 degree code, which is a tool used to manage the relationship between buildings and spaces. It helps to ensure that visual impacts are appropriately contained and that reasonable levels of light and outlook are maintained.</u>
MM27	16	2.24	<i>Delete final sentence and substitute;</i> <u>The Mayor of London's Housing SPG (2012) states that developments should avoid single aspect dwellings that are north facing, exposed to noise levels above which significant adverse health effects on health and quality of life occur, or contain three or more bedrooms (Standard 5.2.1).</u>
MM28	16	2.25	<i>Delete paragraph 2.25</i>
MM29	16	Following 2.25	<i>Insert box;</i> <u>Key Policy and Guidance Links</u> <ul style="list-style-type: none"> • <u>National Planning Policy Framework (2012) paragraph 56-66</u> • <u>London Plan (2011) Policies 7.1, 7.2, 7.3, 7.4, 7.6, 7.7, 7.13, 7.14 and 7.15</u> • <u>Harrow Core Strategy (2012) Policy CS1 B</u> • <u>Safeguarding Aerodromes Direction (2002)</u> • <u>Mayor of London's Housing SPG (2012)</u>
MM30	16	DM2	<i>Add to part A d;</i> <u>in line with Secured by Design principles but gated developments will be resisted.</u>
MM31	17	2.26	<i>Delete last sentence (added as a minor modification on submission) and substitute;</i> <u>The DCLG publication <i>Lifetime Neighbourhoods</i> (2011) identifies six key components for lifetime neighbourhoods: resident empowerment; access; services and amenities; built and natural environments, social networks/well-being and housing^[Footnote].</u> ^[Footnote] <u>See Figure 1, Lifetime Neighbourhoods (2011).</u>
MM32	17	2.27	<i>Insert after second sentence;</i> <u>Further guidance for achieving inclusive and accessible design is provided in the Council's Access for All SPD (2006).</u>
MM33	17	2.28	<i>Delete second, third, fourth and fifth sentences</i>
MM34	17	2.29	<i>Delete existing paragraph and substitute;</i> <u>However, if lifetime neighbourhoods are to be successfully achieved, it will not be enough simply to apply accessibility standards to new</u>

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			<u>development. That is why the policy also applies to secure adaptations to existing buildings through changes of use, conversions, alterations to non-residential buildings and proposals for new shopfronts. Recognising that adaptations to existing buildings are often more challenging, the policy does not apply to householder applications where it might be disproportionate but it can be followed voluntarily where substantial extensions are proposed</u>
MM35	17	2.30	<u>Delete existing paragraph and substitute; The design and layout of all proposals can help reduce crime through providing for increased activity, natural surveillance, access control and creating a sense of ownership. Research shows that the application of Secured by Design and Safer Places principles can reduce burglary and car crime by 50% and criminal damage by 25%. However, gated development is counter to neighbourhood principles ^[Footnote] because it inhibits inclusive access to buildings and spaces, constrains the potential for social interaction between residents within the wider community and may exacerbate the extent to which perceptions of safety and crime do not coincide with the actual risks.</u> ^[Footnote] <u>It should also be noted that London Plan Policy 3.5 requires the design of new dwellings to take account of social inclusion objectives and, in seeking mixed and balanced communities across London, Policy 3.9 underscores the supporting role of design to this end. Paragraph 3.60 of the London Plan states that forms of development such as gated communities can compromise policy objectives for a more socially inclusive city.</u>
MM36	18	2.31	<u>Delete paragraph 2.31</u>
MM37	18	2.32	<u>Amend as follows;—While the design and layout of all development should achieve full integration into the area within which the site is located. However major development provide an opportunity to extend lifetime neighbourhood principles beyond the site boundary to achieve, for example; enhancements to the pedestrian environment and cycle routes between the site and local destinations; <u>the creation of an accessible and integrated public transport network and public realm; and</u> or the implementation of appropriate Green Grid projects. Applicants will be expected to demonstrate how their scheme contributes to the creation of a lifetime neighbourhood within and beyond the site boundary.</u>
MM38	18	2.33 and 2.34	<u>Delete paragraphs 2.33 and 2.34</u>
MM39	18	2.35	<u>Delete last two sentences</u>
MM40	19	2.36	<u>Delete existing paragraph and substitute; Likewise, inclusive access to publicly accessible historic buildings and environments will enable residents and visitors to appreciate the Borough's rich heritage irrespective of personal mobility. By placing people at the heart of the design process, and ensuring new development and its wider context are inclusive to all, this will enhance the quality of the place and the spaces</u>

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			<u>within it, ensuring their continued relevance and minimising the need for awkward, often costly and unsightly alterations in the future.</u>
MM41	19	Following 2.36	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>National Planning Policy Framework (2012) paragraph 58, 61 and 64</u> • <u>London Plan (2011) Policies 2.15, 4.8, 7.1, 7.2 and 7.3</u> • <u>Core Strategy Policy CS1 E</u> • <u>Harrow Access for All SPD (2010)</u> • <u>Harrow Residential Design Guide SPD (2011)</u> • <u>DCLG Lifetime Neighbourhoods (2011)</u> • <u>Crowded Places: The Planning System and Counter-Terrorism (2010)</u> • <u>Protecting Crowded Places: Design and Technical Issues (2010)</u>
MM42	19	DM3	<i>Amend part B a to read;</i> development <u>within a landmark viewing corridor (shown in red) should not exceed the specified threshold height unless it would comprise world class architecture or display outstanding qualities either of which would result in an enhancement to the protected view.</u>
MM43	20	2.38	<i>Delete last sentence and add to penultimate sentence;</i> <u>having regard to the methodology set out in the London View Management Framework.</u>
MM44	20	2.39	<i>Delete first sentence and substitute;</i> <u>Part B a of the policy gives effect to the reasoning set out in an appeal decision relating to 51 College Road. The insert after second sentence; However, visibility should not be conflated with harm. A truly outstanding design that is well located and designed to inspire, excite and delight the viewer may enhance a protected view even if it would exceed the threshold height of one or more landmark viewing corridors.</u>
MM45	20	2.40	<i>Delete paragraph 2.40</i>
MM46	20	Following 2.40	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>London Plan (2011) Policies 7.12</u> • <u>London View Management Framework SPG</u> • <u>Core Strategy Policy CS1 C</u> • <u>Harrow Views Assessment (2012)</u> • <u>CABE and English Heritage - Guidance on Tall Buildings (2007)</u>
MM47	21	DM4	<i>Amend title;</i> Shopfronts and Signs <u>Forecourts</u>
MM48	21	DM4	<i>Amend A;</i> Proposals for shopfronts <u>including blinds, canopies and development on forecourts</u> and signs will be approved where:
MM49	21	DM4	<i>Amend A b;</i> they do not <u>cause an obstruction or adversely affect pedestrian or highway safety;</u>
MM50	21	DM4	<i>Amend A e;</i> the illumination of signs and shopfronts <u>and forecourts</u> would not detrimentally affect the amenity of neighbouring occupiers or the character or appearance of a conservation area; and
MM51	21	2.41	<i>Delete last sentence</i>
MM52	21	2.42	<i>Delete paragraph 2.42</i>

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MM53	21	2.43	<i>Amend as follows;</i> Both individually and cumulatively, minor development such as shopfronts, security shutters and signs <u>canopies</u> can influence perceptions of the accessibility and security of an area <u>and visually impact on street scene</u> . Consistent with the principles of lifetime neighbourhoods, the Council will seek to ensure that new shopfronts achieve inclusive access for all and that projecting signs, 'A' boards and associated paraphernalia do not cause an obstruction to pedestrians and wheelchair users. A proliferation of solid security shutters creates a fortress-like atmosphere in town centres and neighbourhood parades when premises are closed, perpetuating fear of crime and personal safety. Shutters with a transparent 'open mesh' design help to maintain visual interest and, along with a mix of appropriate town centre uses, help to enliven town centres during the evening. Open mesh designs will therefore be sought where shutters are proposed, even if they are replacing existing solid shutters or surrounding shopfronts have predominantly solid shutters. Where possible, shutters should be sited internally to minimise their visual impact in the streetscene. Proposals for security shutters which adversely affect listed buildings and conservation areas will not be permitted.
MM54	22	2.44	<i>Amend as follows;</i> The installation of new shopfronts, including those that replace existing shopfronts, provides the opportunity not only to improve the appearance of the streetscene but also to design-in safety and security features, <u>such as</u> The Council require the use of toughened glass <u>in preference to shutters</u> See Protecting Crowded Places: Design and Technical Issues (2010). <u>when granting planning permission for new and replacement shopfronts as the preferred means</u> <u>to improve the safety and security of ground floor units in town centres and neighbourhood parades.</u>
MM55	22	Following 2.44	<i>Insert box;</i> Key Policy and Guidance Links <ul style="list-style-type: none"> • Core Strategy Policy CS1 B • Harrow Conservation Area SPDs where relevant • Protecting Crowded Places: Design and Technical Issues (2010)
MM56	22	2.45	<i>Delete first sentence</i>
MM57	23	2.46	<i>Amend as follows;</i> Advertisements within residential areas <u>or will rarely be consistent with their amenity and character, and should be avoided.</u> Care will also be needed at the interface of commercial and residential areas to ensure that proposals are sensitive to the change in character and do not <u>can</u> adversely affect the amenity of the residential area. Advertisements which are illuminated or emit noise, such as those which provide a moving display, have considerable potential to cause nuisance to residential occupiers. In the more commercial context of town centres illuminated and moving display units are to be expected, but should <u>could</u> nevertheless have regard to <u>adversely impact upon residential premises above ground level. Intermittent illumination and advertisements above ground floor level with the potential to cause nuisance to residential occupiers will be resisted.</u>

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MM58	23	2.47	<i>Delete third and succeeding sentences</i>
MM59	23	2.48	<i>Delete paragraph 2.48</i>
MM60	23	2.49	<i>Delete last sentence</i>
MM61	23	2.50	<i>Delete paragraph 2.50</i>
MM62	24	2.51	<i>Delete last sentence</i>
MM63	24	Following 2.51	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF paragraph 67</u> • <u>Core Strategy Policy CS1 B</u> • <u>Harrow Conservation Area SPDs where relevant</u> • <u>The Town and Country Planning (Control of Advertisements) (England) Regulations 2007</u>
MM64	24	2.54	<i>Delete paragraph 2.54 and bold heading 1.</i>
MM65	25	2.55	<i>Amend as follows; The strategic value of the Harrow Weald Ridge and Pinner Hill area of special character is as a significant landscape backdrop <u>with that comprises extensive tree cover, and major open areas.</u> The Council will protect existing woodlands and including the cumulative contribution of small groups and individual trees, <u>to the area of special character, and major open areas.</u> The boundaries of the Harrow Weald Ridge and Pinner Hill area of special character largely coincide with those of the Green Belt and this underlines the strategic importance of the area's openness, to be safeguarded from inappropriate development. Proposals that would conspicuously urbanise parts of the area of special character, or incrementally erode the quality and character of its open land as a countryside and natural environment, will be resisted.</i>
MM66	25	2.56	<i>Amend as follows; The strategic value of the Harrow on the Hill area of special character is the prominence that the Hill provides to the historic hilltop settlement, particularly St. Mary's Church and historic Harrow School buildings, and the setting created by <u>the Hill's tree cover and the major open areas,</u> including <u>The Council will ensure that the visual prominence of the hilltop settlement is preserved within its setting, and will maintain the cumulative contribution of groups and individual trees to the area of special character by resisting incremental losses.</u> The boundaries of the Harrow on the Hill area of special character take in playing fields and other spaces which form Metropolitan Open Land around the hilltop settlement. Metropolitan Open Land is afforded the same level of protection as the Green Belt and will therefore be safeguarded from inappropriate development. Proposals that would reduce the openness or damage the integrity of Metropolitan Open Land surrounding Harrow Hill, including that adjacent to but outside of the area of special character, will be resisted.</i>
MM67	25	2.57	<i>Delete bold heading 2 and paragraph 2.57</i>
MM68	25	2.58	<i>Delete final sentence</i>
MM69	25	2.59	<i>Delete last clause of second sentence and all of subsequent sentences.</i>

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MM70	25	2.60	<i>Delete final sentence</i>
MM71	26	2.61	<i>Amend as follows; In landscape terms, the skyline of Harrow Weald Ridge and Pinner Hill on the horizon, and the distinctive profile of Harrow on the Hill, are closely related to the strategic value of these areas of special character and will therefore be protected from intrusive development. However other features such as ponds, meadows, hedges, ancient field patterns, dykes and ditches may also be important to the special character of the areas, and should be protected.</i>
MM72	26	2.61	<i>Delete bold heading 3</i>
MM73	26	2.62	<i>Delete final sentence</i>
MM74	26	2.63	<i>Delete final sentence</i>
MM75	26	2.64	<i>Delete paragraph 2.64</i>
MM76	26	Following 2.64	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>National Planning Policy Framework (2012) paragraph 58</u> • <u>Core Strategy Policies CS 3, 6 and 10</u> • <u>Harrow Conservation Area SPDs where relevant</u>
MM77	28	3.3 to 3.7	<i>Delete paragraphs 3.3 to 3.7</i>
MM78	29	3.8	<i>After second sentence, insert; <u>The NPPF sets out national policy on the consideration of impacts arising from development proposals upon the significance of heritage assets, and key terms used in that policy^[Footnote] are defined in the glossary to the NPPF. And add footnote; Such as 'designated heritage asset', 'heritage asset', 'setting of a heritage asset' and 'significance'.</u></i>
MM79	29	DM7	<i>Below first heading, insert sub-heading <u>Managing Heritage Assets</u></i>
MM80	29	DM7	<i>Amend first sentence of part A to read; <u>When assessing proposals affecting heritage assets, including non designated heritage assets, priority over other policies in the DPD will be afforded to the conservation of the assets affected and their setting as appropriate to the significance of the assets. And delete final sentence of part A.</u></i>
MM81	29	DM7	<i>Delete all of part B, including subsections a, b and c.</i>
MM82	30	DM7	<i>Amend part C b as follows; relevant issues of design, <u>appearance</u> and character including proportion, scale, height, massing, bulk, alignment, materials, historic fabric, use, features, location, relationship with adjacent assets, setting, layout, plan form and landscaping;</i>
MM83	30	DM7	<i>Amend part C f as follows; the desirability of increasing understanding <u>and</u> interpretation and public access of heritage assets; <u>and</u></i>
MM84	30	DM7	<i>Add to part C; <u>g the reversibility of any change.</u></i>
MM85	30	DM7	<i>Amend part D as follows; The Council will use planning conditions and planning obligations where necessary to <u>ensure the preservation, conservation or enhancement of heritage assets and their setting, and to secure the exploitation of opportunities for the sustainable public access to enjoyment and increased understanding of the historic environment.</u></i>

Ref	Page	Policy/ Paragraph	Main Modification
MM86	30	DM7	<p><i>Add;</i></p> <p><u>Conservation Areas</u></p> <p><u>E In addition to (A) and (B) above, when considering proposals within conservation areas, the Council will:</u></p> <p>a. <u>support the redevelopment of sites that detract from the character or appearance of the conservation area; and exploit opportunities to restore lost features or introduce new ones that would enhance the character and appearance of the conservation area.</u></p> <p><u>Listed Buildings</u></p> <p><u>F In addition to (A) and (B) above, when considering proposals affecting listed buildings and their setting, the Council will:</u></p> <p>a. <u>pay special attention to the building's character and any features of special architectural or historic interest which it possesses, and the role of the building's setting in these regards; and exploit all opportunities to secure the future of listed buildings particularly those on the 'heritage at risk' register.</u></p> <p><u>Scheduled Ancient Monuments</u></p> <p><u>G In addition to (A) and (B) above, when considering proposals affecting scheduled ancient monuments, the Council will have regard to:</u></p> <p>a. <u>the relationship of the monument with other archaeology and the wider landscape in which it should be interpreted;</u></p> <p>b. <u>the condition and management of the monument; and</u></p> <p>c. <u>the existing and future security of the monument.</u></p> <p><u>H Major development and change of use proposals affecting a scheduled ancient monument will be required to provide and implement an action plan for the management of the monument.</u></p> <p><u>Archaeology</u></p> <p><u>I In addition to (A) and (B) above, when considering proposals affecting an archaeological priority area, the Council will have regard to:</u></p> <p>a. <u>the known or anticipated significance of the archaeology;</u></p> <p>b. <u>the likely implications of the proposal upon the archaeology; and</u></p> <p>c. <u>the need to preserve the archaeology in situ; or</u></p> <p>d. <u>the adequacy of arrangements for the investigation, recording, archiving and (where appropriate) curation of archaeology not requiring preservation in situ.</u></p>
MM87	30	3.9	<i>Delete paragraph 3.9</i>
MM88	30	3.10	<i>Delete all but first sentence</i>

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MM89	30	3.11	<i>Delete first sentence and following text at end of paragraph; and will approve proposals that secure the preservation, conservation or enhancement of a heritage asset. Proposals that maintain or enhance enjoyment of the historic environment and do not prejudice the integrity or conservation of the historic environment will also be approved.</i>
MM90	31	3.13 to 3.19	<i>Delete paragraphs 3.13 to 3.19 and headings</i>
MM91	32	3.20	<i>Amend the fourth sentence as follows; Where relevant to a proposal The detailed policies and guidance set out in these documents and further information relating to the significance of these assets, such as historic Ordnance Survey maps, will be a <u>can provide further material considerations.</u> And delete final sentence.</i>
MM92	32	Heading 2	<i>Delete heading</i>
MM93	32	3.21	<i>Amend first sentence as follows; <u>Issues of design, appearance and character</u> These are the main issues to consider in proposals for additions and alterations to heritage assets, and new development affecting heritage assets, as they have the potential to affect <u>impact</u> their significance. Delete the fourth sentence and amend the fifth sentence as follows; Historic fabric and features are always an important part of the significance of heritage assets, and there is therefore a presumption in favour of their retention as part of any good conversion or alteration. Delete the remainder of the paragraph.</i>
MM94	33	3.22 to 3.23	<i>Delete both paragraphs</i>
MM95	33	3.24	<i>Amend as follows; There is a presumption in favour of retaining the existing or original location and layout of heritage assets <u>can make a significant contribution to as this</u> contributes to their historical context and meaning. Similarly, there is a presumption in favour of the original use of a heritage asset since this is <u>will often be</u> the most compatible with its character and fabric. Securing the appropriate and viable use of a heritage asset that is compatible with its character and fabric in the long term is an important part of its conservation. Some degree of compromise in use may assist in retaining significance such as having less daylight than usually expected. Setting is the surroundings in which an asset is experienced, some of which make a positive contribution to or better reveal their significance. It can extend some distance from the site. It is expressed by visual considerations and other environmental factors such as noise, traffic, and the historic relationship between places. For example, buildings often have an important established relationship with existing or former surrounding landscaping. Proposals to alter landscaping are more likely to be acceptable if based on a well-researched understanding of this. English Heritage provide detailed guidance on the setting of heritage assets in their document entitled: 'Setting of Heritage Assets' (October, 2011). Proposals for below-ground (subterranean)</i>

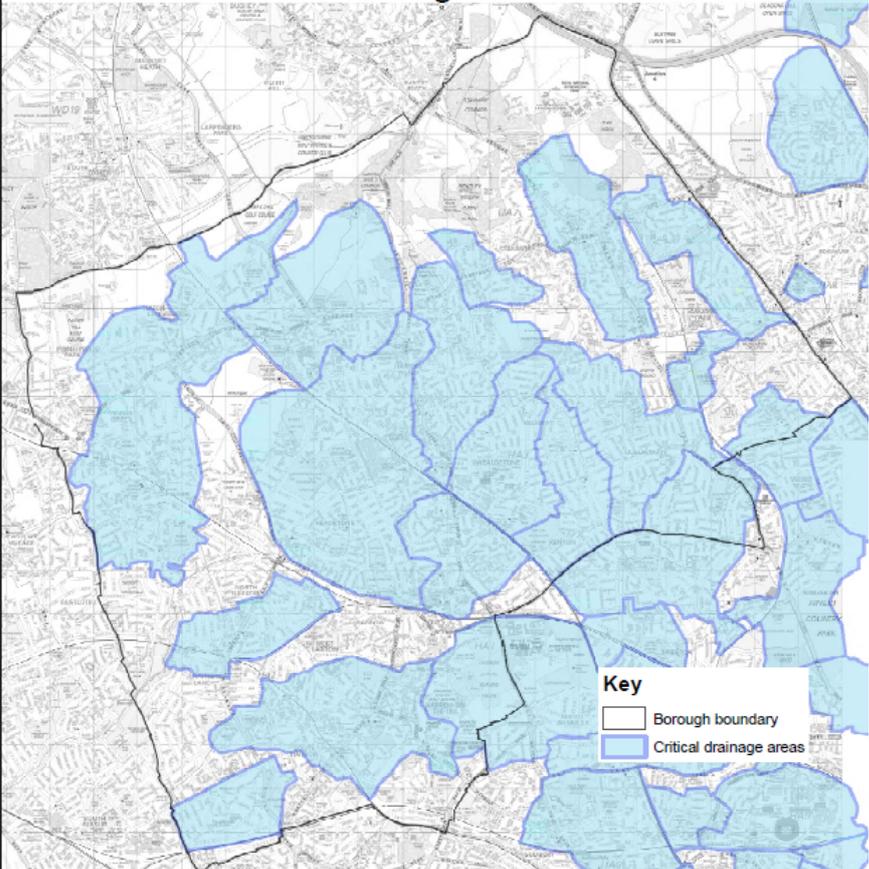
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			development and modifying <u>modification of</u> internal layouts can <u>also</u> impact upon the significance of heritage assets. and so many of these issues will be just as relevant as when assessing externally visible alterations.
MM96	33	Heading 3	<i>Delete heading</i>
MM97	33	3.25 to 3.27	<i>Delete paragraphs 3.25 to 3.27 and substitute; <u>Harrow's heritage assets provide both a reference point to the area's predominantly rural past and examples of the best of 20th Century suburban development. Some have specific economic roles within the Borough, for example Harrow School as a major independent educational establishment and the museum at Bentley Priory as a new, nationally significant tourist attraction. Others are of broader social or cultural importance as examples of London's 'Metroland' expansion or surviving village centres and farm complexes. Conserving and sustaining the significance of heritage assets and their setting will help to ensure their continued contribution to the Borough's economy and its local distinctiveness.</u></i>
MM98	34	Heading 4	<i>Delete heading</i>
MM99	34	3.28	<i>Delete second and third sentences and substitute; <u>As noted above, the conservation and viable use of heritage assets can also have economic benefits for the Borough.</u> Delete final sentence.</i>
MM100	34	Heading 5	<i>Delete heading</i>
MM101	34	3.29	<i>Delete sixth, eight and ninth sentences</i>
MM102	35	3.30	<i>Delete paragraph 3.30</i>
MM103	35	Heading 6	<i>Delete heading</i>
MM104	35	3.31	<i>Delete as explained below in third sentence. Delete fifth and sixth sentences.</i>
MM105	35	Before 3.32	<i>Delete heading</i>
MM106	35	3.32	<i>Delete paragraph 3.32 and substitute; <u>Policy 7.8 of the London Plan encourages boroughs to include policies for improving access to the historic environment and heritage assets and their settings. Permanent public access, such as that at Bentley Priory Museum, Harrow Museum and Headstone Manor, provide opportunities for residents and visitors to value the architectural and historic value of the Borough's heritage assets. Public access agreements or other provisions, as part of Planning Obligations or conditions for proposals associated with significant heritage assets, can provide opportunities to increase participation in such events - particularly where participation would widen appreciation of the Borough's heritage assets within their Greater London context - or secure more permanent public access to the historically or architecturally significant components of the heritage asset.</u></i>
MM107	35	3.33 to 3.35	<i>Delete paragraphs 3.33 to 3.35.</i>
MM108	36	After 3.35	<i>Insert;</i>

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			<p><u>Conservation Areas</u></p> <p><u>The redevelopment of some sites within conservation areas may offer the opportunity to remove buildings or other features that detract from the character or appearance of the conservation area. Harrow's Conservation Area Supplementary Planning Documents (and their associated character appraisals and management plans) include provisions for redundant buildings, under-utilised sites and other structures/buildings that detract from the character and appearance of the areas concerned.</u></p> <p><u>Some proposals may offer the opportunity to restore lost layouts, views/vistas, landscaping, boundary treatment or other features of significance to the conservation area. Similarly, opportunities may exist through new development to introduce new features. Again, Harrow's Conservation Area Supplementary Planning Documents (and their associated character appraisals and management plans) identify specific opportunities to restore specific features and it is recognised that development may bring unforeseen opportunities for the restoration or creation of new features.</u></p> <p><u>Listed Buildings</u></p> <p><u>There are over 300 statutorily listed buildings and over 700 locally listed buildings in Harrow. In numerical terms, therefore, listed buildings constitute the largest component of the Borough's historic environment. Particular care is needed to ensure that alterations, extensions and any other development affecting listed buildings does not prejudice their architectural or historic integrity, including that associated with their setting.</u></p> <p><u>The Council endeavours to ensure that listed building owners are aware of their responsibilities. Statutory powers allow the Council to step in when listed buildings are seriously neglected. However, positive solutions that provides a viable, long term future for listed buildings and which prevents them becoming 'at risk' are invariably preferable to the use of legal interventions, particularly in respect of buildings on the heritage at risk register (see paragraph 3.37 below).</u></p> <p><u>Buildings of local interest in Harrow make a special contribution to the architectural and historic identity of the Borough. By inclusion on the Harrow list, the Council is highlighting their local significance to be taken into consideration when making planning decisions which affect them. Within conservation areas, local listing indicates that the building (or group of buildings) is of some significance to the character and appearance of the area. Outside of conservation areas, a building's (or group of buildings') inclusion on the local list demonstrates special local architectural or historical significance meriting retention.</u></p>

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			<p><u>Ancient Monuments and Archaeology</u></p> <p><u>Harrow has a rich archaeological heritage. This reflects the geology and topography of the land which attracted early settlers and the Borough's proximity to London, which has dominated trade and governance in Britain since Roman times. The landscape of Middlesex was a hospitable one, being rich in woodland, fertile agricultural land and an abundant availability of fresh water. It provided for early industrial activity and settlement, for farming and was attractive to nobility as a domestic and recreational location. The benign nature of the environment and landscape processes in the area has resulted in a legacy of well preserved archaeological features. However, the greatest threat to archaeological resource has been, and remains, human activity particularly development.</u></p> <p><u>Scheduled Ancient Monuments are a statutory designation for remains that are recognised as having national importance and are, therefore, safeguarded for their intrinsic value for the benefit of current and future generations. Scheduled Ancient Monuments in Harrow make a significant contribution to the Borough's heritage and are the most important sites of archaeological interest. However, Harrow's archaeological heritage includes some sites of more local significance as well as areas where insufficient evidence exists to justify formal scheduling. Locations within Harrow which are suspected to contain below ground archaeology, upon the advice of English Heritage, are designated as Archaeological Priority Areas.</u></p> <p><u>The Council is committed to securing the conservation and understanding of all historic assets including those of archaeological interest. The Borough's Scheduled Ancient Monuments and Archaeological Priority Areas are shown on the Harrow Policies Map and further information about them is available via the Council's website. The desirability of preserving a scheduled ancient monument and its setting is a material consideration in the determination of planning applications. The National Planning Policy Framework (2012) establishes a clear presumption against the loss of, or substantial harm to, a scheduled ancient monument and states that any harm to a designated heritage asset, which is less than substantial, must be weighed against the public benefits of the proposal. London Plan Policy 7.8 provides further planning decisions criteria relating to archaeological assets. Scheduled Ancient Monuments protect the most important, nationally significant archaeological survivals. However, as noted above, Harrow has a rich archaeological heritage which includes some sites of more local significance as well as areas where insufficient evidence exists to justify formal scheduling. Locations within Harrow which are suspected to contain below ground archaeology, upon the advice of English Heritage, are identified on Harrow's proposal map as archaeological priority areas. A number of these are related to features the subject of</u></p>

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			<p><u>formal designation as Scheduled Ancient Monuments.</u></p> <p><u>Developments where heritage assets of archaeological interest have been identified may be subject to mitigation measures in order to understand the asset. This might include field investigation or excavation and analysis, dissemination and archiving of results. The Council will also encourage community engagement and involvement in any programme of archaeological work.</u></p>
MM109	36	Following 3.35	<p><i>Insert box; Key policy and guidance links</i></p> <ul style="list-style-type: none"> • <u>National Planning Policy Framework (2012) paragraphs 126-141</u> • <u>London Plan (2011) Policy 7.8</u> • <u>Harrow Core Strategy (2012) Policy CS1 D</u> • <u>Harrow Conservation Area Supplementary Planning Documents, character appraisals and management strategies (various)</u> • <u>English Heritage: The Greater London Sites and Monuments Record</u> • <u>English Heritage: Greater London Archaeological Advisory Service (GLAAS) Charter</u> • <u>DCLG/English Heritage: Historic Environment Planning Practice Guide (2010) (revised 2012)</u> • <u>English Heritage: Conservation Principles and Policies for the Sustainable Management of the Historic Environment (2008)</u> • <u>English Heritage: Setting of Heritage Assets (2011)</u> • <u>English Heritage: Climate Change and the Historic Environment (2008)</u>
MM110	36	DM8	<i>Delete part A including subsections a, b and c</i>
MM111	36	3.36	<i>Delete paragraph 3.36 and substitute; The national context for enabling development is set out at paragraph 140 of the National Planning Policy Framework (2012). By definition, enabling development should be a tool of last resort after all other reasonable avenues that would secure the asset's survival have been exhausted.</i>
MM112	36	3.37	<i>Delete paragraph 3.37 and substitute; There are a total of 15 of the Borough's heritage assets on the English Heritage London Heritage at Risk Register (2012). These comprise 10 buildings/structures, 1 registered park and garden, and 4 scheduled ancient monuments. The Council takes its responsibility to help secure the conservation of heritage assets for future generations' enjoyment seriously, and to this end has been working positively with owners and other partners to ensure the survival of assets on the register and to avoid others being added to the register. In a number of instances, sensitive enabling development has been approved (or agreed in principle) to secure the restoration and conservation of heritage assets.</i>
MM113	37	Following paragraph 3.37	<p><i>Insert box; Key policy and guidance links</i></p> <ul style="list-style-type: none"> • National Planning Policy Framework (2012) paragraph 140 • London Plan (2011) Policy 7.9 • Harrow Core Strategy (2012) Policy CS1 D

Ref	Page	Policy/ Paragraph	Main Modification
			<ul style="list-style-type: none"> English Heritage: Enabling Development and the Conservation of Significant Places (2008)
MM114	37	Paragraphs 3.38 to 3.104, including DM9, 10, 11, 12, 13, 14 and 15	<i>Delete all</i>
MM115	53	DM16	<i>In part A, add to end of first sentence; including surface water.</i>
MM116	53	DM16	<i>Add to part A d; which, for residential development in flood zone 3, should be at least 300mm above the modelled 1 in 100 year plus climate change flood level; and</i>
MM117	53	DM16	<p><i>Amend part D and subdivide as follows;</i></p> <p><u>D Sites that are mapped as falling within Developed Zone 3B will be treated as having a high probability of flood risk, for the purposes of applying the sequential and (where necessary) exception tests, provided that the development would be safe and would not increase the risk or severity of flooding elsewhere. Opportunities will be sought through from the redevelopment of previously developed sites in floodplains</u></p> <p><u>Developed Zone 3B to restore the natural function and storage capacity of the floodplain.</u></p> <p><u>E Sites that are mapped within Greenfield Zone 3B will be treated as functional floodplain for the purposes of applying the sequential and (where necessary) exception tests. Proposals that involve the loss of undeveloped floodplain or otherwise would constrain its natural function, by impeding flow or reducing storage capacity, will be resisted.</u></p>
MM118	53	Before 4.3	<p><i>Insert new paragraph; After the floods in July 2007, the Government commissioned the Pitt Review which concluded with 92 recommendations. The Government responded to these and the EU Floods Directive by enacting the Flood Risk Regulations (2009) and Flood & Water Management Act (2010), which shifted the emphasis from building flood defences to managing risk in line with the previous Government statement on 'Making Space for Water'. This legislation requires local authorities to take on a leadership role in local flood risk management, ensuring that all sources of flooding, including ordinary watercourses, surface water, groundwater and sewer flooding are identified and managed as part of a locally agreed work programme. This recognises the need to develop an integrated approach to urban drainage management between the various responsible bodies, including the Council, the Environment Agency and sewerage undertakers. Under the new requirements the Council, as Lead Local Flood Authority (LLFA), also has responsibility for producing a preliminary Flood Risk Assessment that includes hazard and risk maps to inform its Flood Risk Management Plan, Flood Risk Strategy and Flood Defence Asset register. These legislative requirements also provide the</i></p>

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			<u>context for the preparation of Harrow's Surface Water Management Plan and the Council's new role as an approver of sustainable drainage schemes linked to new development.</u>
MM119	53	4.3	<i>Delete first sentence and amend following sentence as follows:</i> Harrow's Strategic Flood Risk Assessments (SFRAs) have identified in broad terms areas that are liable to flooding from watercourses within the catchments of these <u>rivers Rivers Brent, Colne and Crane</u> , and the associated probability of flooding (i.e. the flood zones <u>shown on the Policies Map</u>).
MM120	54	4.4	<i>Add;</i> <u>Harrow's Critical Drainage Areas extend over most of the Borough and can be viewed on the online Policies Map and in the Harrow Surface Water Management Plan (2012).</u> <i>Insert diagram showing Critical Drainage Areas;</i> Critical Drainage Areas 
MM121	54	4.5	<i>Delete last two sentences.</i>
MM122	54	4.6	<i>Amend first sentence as follows;</i> <u>The NPPF and technical guidance states that a site specific Flood Risk Assessment (FRA) is required to be prepared for:</u> (then continue as existing).
MM123	54	4.7, 4.8 and 4.9	<i>Delete paragraphs 4.7, 4.8 and 4.9</i>
MM124	55	Heading 1	<i>Delete heading</i>
MM125	55	4.10	<i>Delete final sentence</i>
MM126	55	4.11 to	<i>Delete paragraphs 4.11 to 4.16, including headings</i>

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		4.16	
MM127	56	4.17	<p><i>Amend as follows;</i> Some of the Borough's open spaces contain river corridors and form a part of the functional flood plain^[Footnote a] <u>The modelled flood extents illustrated on Harrow's flood maps represents the best available information about the strategic risk of flooding. Due regard must be given to areas shown as falling within the functional floodplain, which represents the most frequent and serious risk of flooding. However for the purposes of applying the National Planning Framework (paragraphs 100-104) and associated Technical Guidance, a distinction will be made between Greenfield Zone 3b and Developed Zone 3b. Such Undeveloped floodplain, defined as Greenfield Zone 3b flood extents within areas designated as Green Belt, Metropolitan Open Land or open space on the Policies Map, is of particularly high value within the urban context. It provides unimpeded space where water is able to flow or be stored during times of flood, and will be protected for these purposes. However, as recognised in flood management plans^[Footnote b], much of the Borough is already urbanised with many rivers culverted, changing their behaviour in response to rainfall and flooding. <u>Previously developed land within the floodplain, defined as Developed Zone 3B flood extents on land not designated as Green Belt, Metropolitan Open Land or open space on the Policies Map, provides the opportunity through redevelopment to realise the flood risk management and reduction objectives of Harrow's Core Strategy and the Thames Catchment Flood Management Plan. However, Zone 3B represents land where water has to flow or be stored in times of flood and it therefore remains essential that development in this zone is designed to be safe and does not simply displace flood risk to land elsewhere. Redevelopment of previously developed sites will therefore provide the only realistic opportunity to restore the natural function of the flood plain in many areas. In recognition of this fact, together with the emphasis placed on brownfield land in the delivery of Harrow's development needs over the plan period, and subject to the adequacy of the resistance and resilience of the proposal as evidenced through the site specific FRA, the Council will treat previously developed sites that are mapped as falling within the functional floodplain (zone 3b) as being within high probability (zone 3a) flood risk areas. Proposals on such sites must demonstrate that the development would be safe, taking into account the effectiveness of any relevant emergency plans, and the proposal must not increase the risk or severity of flooding elsewhere. The design and layout of proposals should be used to provide flood flow routes, on-site flood storage compensation, or such other mechanisms that may be appropriate. Particular attention will be paid to the need to maintain undeveloped buffers (Harrow Land Drainage Bylaw 10) alongside main rivers and ordinary watercourses (see Policy 18 and paragraph 4.42). Proposals that would further constrain the natural function of the flood plain by impeding flood flow or reducing storage capacity will be resisted.</u></u></p>

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			<p>^[Footnote a] Examples include Headstone Manor Recreation Ground, Harrow Recreation Ground, Pinner Park Farm, Newton Park (east) and Queensbury Recreation Ground. Some open spaces have been adapted specifically to function as flood storage areas, such as the open space at Stanmore Park, Whitchurch Playing Fields and Prince Edward Playing Fields, whilst the Core Strategy recognises the potential of Kenton Recreation Ground to provide a sustainable flood management solution for more urban areas up and downstream of the Wealdstone Brook.</p> <p>^[Footnote b] Harrow's Preliminary Flood Risk Assessment and Surface Water Management Plan. The Thames Catchment Flood Management Plan (Environment Agency, 2009) includes Harrow in sub area 9: London catchments where it is accepted that the most sustainable approach to managing flood risk is through adaptation of the urban environment.</p>
MM128	56	Following 4.17	<p><i>Insert new box; Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • <u>NPPF paragraphs 99 - 104</u> • <u>London Plan Policy 5.11 - 5.15</u> • <u>Core Strategy Policy CS1 U, V, W and relevant sub area policy</u> • <u>Harrow's Surface Water Management Plan (2012)</u> • <u>Thames Catchment Flood Management Plan (2009)</u> • <u>River Brent and Crane Catchment Flood Management Plans</u>
MM129	56	DM17	<p><i>Add to part A; <u>Where greenfield run-off rates cannot be achieved this should be clearly justified by the applicant; however the fact that a site is previously developed and has an existing high run-off rate will not constitute justification.</u></i></p>
MM130	57	4.19	<p><i>Delete the third sentence.</i></p>
MM131	58	4.22	<p><i>Delete final sentence and substitute; <u>The use of non permeable surfacing impacts upon the ability of the environment to absorb surface water, and the hard surfacing of front gardens and forecourts can lead to localised surface water flooding.</u></i></p>
MM132	58	4.23	<p><i>Delete first, second, fifth and sixth sentences and amend third sentence as follows; London Plan Policy (2011) Policy 5.13 and Harrow's Core Strategy (2012) state that proposals should aim to achieve greenfield run off rates.</i></p>
MM133	58	Following 4.23	<p><i>Add two new paragraphs;</i></p> <p><u>Forthcoming legislation will require sustainable drainage systems to be submitted to, and be approved by, the Lead Local Flood Authority (LLFA) and SuDS Approving Body (SAB)^[Footnote]. Pending the implementation of this legislation, and to ensure the adequacy of surface water drainage over the lifetime of the development, applicants will be required to agree with the Council the arrangements for the long term management and maintenance of the proposed systems.</u></p> <p><u>^[Footnote]Section 32 and Schedule 3 of the Flood and Water Management Act (2010).</u></p> <p><u>Without mitigation, the cumulative impact of small scale development throughout the Borough is likely to be continued pressure on the finite capacity of the traditional drainage network. Proposals for householder development^[Footnote a].</u></p>

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			<u>minor extensions to commercial premises^[Footnote b] and conversions of houses and other buildings to flats should, therefore, also contribute to a reduction in the rate of surface water run off. The Council will apply criteria (B)(a) & (b) above to such proposals to secure appropriate, sustainable measures for surface water run off reduction and to ensure that connections to existing, traditional infrastructure maintains separation between the surface and foul water systems.</u> ^[Footnote a] <u>Extensions and outbuildings that result in a net increase in the footprint of buildings on the site, irrespective of any existing hardsurfacing.</u> ^[Footnote b] <u>With a proposed gross footprint of 200 square metres or less.</u>
MM134	58	4.24 to 4.31	<i>Delete paragraphs 4.24 to 4.31 including heading 1</i>
MM135	59	Heading 2	<i>Delete heading 2</i>
MM136	59	4.32	<i>Delete final sentence and substitute; <u>With regard to drainage capacity enhancements, for those sites where Thames Water has raised concerns regarding the sewerage network capacity to serve the proposed development^[Footnote], a drainage strategy will need to be produced by the developer in liaison with Thames Water. This is to include a detailed model of the network capacity to determine if mitigation is required. The drainage strategy is required to ensure any appropriate mitigation, including network upgrades, are undertaken ahead of occupation of the development.</u></i> ^[Footnote] <u>Site Allocations Sites R4, R7 EM1-5, H14, H18, GB1, GB2, and AAP Sites as listed in paragraph 4.112 of the Area Action Plan DPD</u>
MM137	60	4.33 to 4.37 and headings	<i>Delete paragraphs 4.33 to 4.37 and headings 3 and 4</i>
MM138	60	After 4.37	<i>Insert box; Key Policy and Guidance</i> <ul style="list-style-type: none"> • <u>NPPF Paragraphs 99 - 104</u> • <u>London Plan Policy 5.11 - 5.15</u> • <u>Core Strategy Policy CS1 U, V, W and relevant sub area policy</u> • <u>Veolia Water Central, Water Resources Management Plan (2010)</u> • <u>Harrow Surface Water Management Plan (2012)</u>
MM139	61	DM18	<i>Amend part A as follows; The design and layout of development on sites containing a main river or ordinary watercourse within the site boundary will be required to maintain an undeveloped buffer zone of <u>8 metres either side of a main river, 5 metres either side of an ordinary watercourse, or an appropriate width as may be agreed by the Environment Agency or Council.</u></i>
MM140	61	DM18	<i>Amend part B a as follows; have regard to the <u>relevant provisions of the Thames River Basin Management Plan and the London River Restoration Action Plan;</u></i>
MM141	61	DM18	<i>Amend part B b as follows; investigate and, where feasible, having regard to the current condition of the watercourse,</i>

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			secure the implementation of environmental enhancements to open sections of river or watercourse; and
MM142	61	DM18	<u>Add to part B c which must include an adequate buffer for flooding and maintenance purposes.;</u>
MM143	61	4.38	<u>Add; As previously developed sites come forward for redevelopment, these offer the opportunity to maintain and enhance the natural functioning of the watercourse, or where culverted, to restore the watercourse back to a more natural state.</u>
MM144	62	4.41	<i>Delete paragraph 4.41</i>
MM145	62	4.42	Amend as follows; The Council will seek the preservation (and where appropriate, the restoration) of undeveloped Buffers alongside main rivers and ordinary watercourses throughout the Borough. Such buffers contribute to sustainable flood risk management by preserving unobstructed flood flow routes and ensuring that there is adequate space for routine and/or emergency maintenance of main rivers and ordinary watercourses. At the same time, the introduction or maintenance of a buffer can provide the opportunity to improve public access and contribute towards the enhancement of Harrow's Green Grid. The design and layout of new development, including householder extensions and curtilage structures, will be required to maintain an 8 metre buffer either side of a main river and a 5m buffer either side of an ordinary watercourse, or such other appropriate buffer width as may be agreed by the Environment Agency and the Council.
MM146	62	4.44 to 4.48 and headings 1 to 3	<i>Delete paragraphs 4.44 to 4.48 and headings 1 to 3</i>
MM147	63	4.49	<i>Delete final sentence and substitute; These flood defence infrastructure and water quality measures are important to the functioning of the drainage network of the Borough and need to be retained and where appropriate enhanced.</i>
MM148	63	Following 4.49	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF paragraphs 100 and 109</u> • <u>London Plan Policies 7.24 - 7.28</u> • <u>Core Strategy Policy CS1 U, V, W and relevant sub area policy</u> • <u>Harrow Land Drainage Act (1991) Bylaws</u> • <u>Water for Life and Livelihoods (2009)</u> • <u>Harrow's Strategic Flood Risk Assessment (2009)</u> • <u>Harrow Biodiversity Action Plan</u>
MM149	64	DM19	<i>Delete part A, including subsections a and b and substitute;</i> <p><u>A The design and layout of development proposals should:</u></p> <ol style="list-style-type: none"> a. <u>utilise natural systems such as passive solar design and, wherever possible, incorporate high performing energy retention materials, to supplement the benefits of traditional measures such as insulation and double glazing;</u> b. <u>make provision for natural ventilation and shading to prevent internal overheating;</u> c. <u>incorporate techniques that enhance biodiversity, such as</u>

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			<p><u>green roofs and green walls (such techniques will benefit other sustainability objectives including surface water attenuation and the avoidance of internal and urban cooling); and</u></p> <p>d. <u>where relevant, the design and layout of buildings should incorporate measures to mitigate any significant noise or air pollution arising from the future use of the development.</u></p>
MM150	65	4.53 to 4.55	<p><i>Delete paragraphs 4.53 to 4.55 and substitute; <u>London Plan Policy 5.2 Minimising Carbon Dioxide Emissions sets out targets for carbon dioxide reduction to be met by major development proposals and sets out the requirements for detailed energy assessments for such applications. Policy 5.3 Sustainable Design and Construction sets out the principles for sustainable design and construction. The Council recognises that the London Plan requirements are likely to pose a greater challenge for minor development but such proposals will nevertheless have a cumulative impact upon carbon dioxide emissions and, in the case of extensions/adaptations, may provide the opportunity to improve the energy performance of existing buildings. For this reason it is important for the design and layout of all development, including minor proposals, to achieve insofar as possible the principles of sustainable design and layout.</u></i></p>
MM151	65	4.56	<p><i>Delete heading and first sentence. Amend second sentence as follows; These <u>Sustainable Design</u> measures will help to manage future heating costs and minimise the need for artificial cooling systems during hot periods.</i></p>
MM152	65	4.57	<p><i>Delete heading and first sentence.</i></p>
MM153	65	4.58	<p><i>Delete heading and paragraph 4.58</i></p>
MM154	66	4.60 to 4.69	<p><i>Delete headings and paragraphs 4.60 to 4.69</i></p>
MM155	67	4.70	<p><i>Delete final two sentences</i></p>
MM156	67	Following 4.70	<p><i>Insert box; <u>Key Policy and Guidance Links</u></i></p> <ul style="list-style-type: none"> • <u>NPPF Paragraphs 95-98</u> • <u>London Plan Policy 5.2,5.3,5.4 and 5.9, 5.10, 5.11</u> • <u>Core Strategy Policy CS1 T</u> • <u>Harrow Residential Design Guide SPD</u> • <u>Harrow Accessible Homes SPD</u>
MM157	68	4.71	<p><i>Preface with; <u>Decentralised energy systems generate power at the point of use, thereby reducing energy loss and waste.</u></i></p>
MM158	68	4.72	<p><i>Amend as follows; In response to the London Plan and the London Heat Mapping Study ^[Footnote c] tool, Harrow's Core Strategy (2012) identifies the Harrow & Wealdstone Intensification Area as the location most capable of supporting an area-based decentralised network. <u>Outside of the Intensification Area, opportunities are more limited due to the suburban characteristics of the Borough and the dispersed nature of buildings of the kind suitable for a decentralised energy system.</u> However, <u>as set out in the study findings,</u> this does not preclude the <u>potential</u> realisation of opportunities for decentralised networks to come forward in small clusters</i></p>

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			elsewhere in the Borough. The Council will support proposals for decentralised energy systems on individual sites and, where there is a local network and it is feasible to do so, will require proposals for minor residential and non-residential development to connect to it. [Footnote c] <u>Mayor of London, London Heat Mapping Study - London Borough of Harrow (March 2012)</u>
MM159	68	Following 4.72	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF Paragraphs 96 - 98</u> • <u>London Plan Policy 5.6</u> • <u>Core Strategy Policy CS1 T and relevant sub area guidance</u>
MM160	68	4.73	<i>Delete final sentence</i>
MM161	68	4.74	<i>Amend cross reference to paragraph 4.70 and delete final two sentences.</i>
MM162	69	Following 4.74	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF Paragraphs 95-98</u> • <u>London Plan Policy 5.7 and 5.8</u> • <u>Core Strategy Policy CS1 T</u>
MM163	69	DM22	<i>Delete part A including subsections a and b.</i>
MM164	69	DM22	<i>Amend part B as follows; Proposals <u>for the redevelopment or re-use of land known or suspected to be contaminated and development or activities that pose a significant new risk of land contamination</u> will be considered having regard to:</i> a) the findings of the <u>a preliminary land contamination risk assessment; (then continue as existing)</u>
MM165	70	4.77	<i>Delete final two sentences</i>
MM166	70	4.78 and heading 1	<i>Delete paragraph 4.78 and heading 1</i>
MM167	70	4.80 and heading 2	<i>Delete heading 2 and amend paragraph 4.80 as follows; The condition of the contaminated land, (taking into account <u>the nature and extent of the known or suspected land contamination, the site's history and environmental characteristics, and where relevant its condition following remediation or the risk to its condition from proposed new uses,</u>) will determine the compatibility for the intended end uses. On sites with low level contamination, re-use for some industrial activities may be compatible with a minimal degree of remediation. Conversely, sites with more significant levels of contamination and proposed for residential redevelopment may only be compatible with comprehensive remediation. Notwithstanding any safeguards set out in the preliminary land contamination risk assessment, proposals that pose a significant new risk of contamination should be avoided on greenfield sites.</i>
MM168	70	4.81 and heading 3	<i>Delete heading 3 and final sentence of paragraph 4.81.</i>
MM169	70	4.82	<i>Delete paragraph 4.82</i>
MM170	70	Following 4.82	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF paragraphs 109 and 121</u> • <u>London Plan Policy 5.21</u> • <u>Core Strategy Policy T</u>

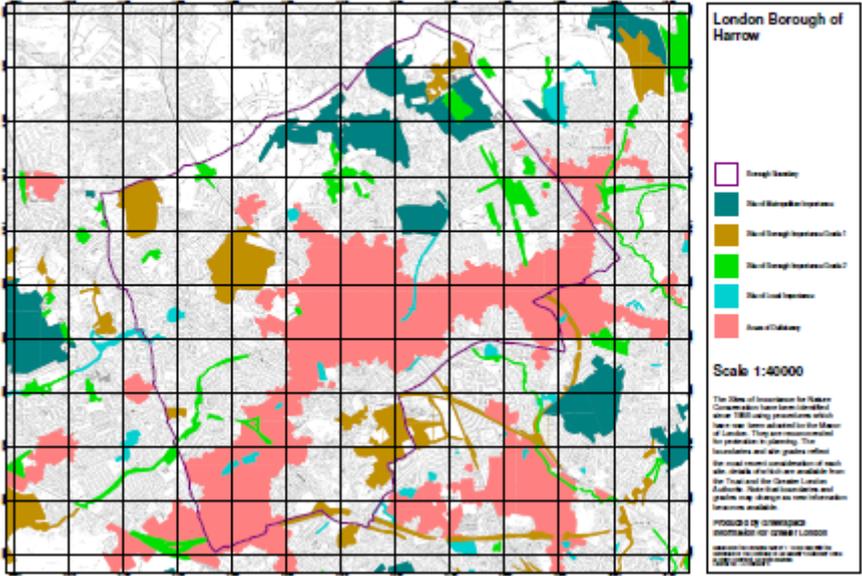
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MM171	73	DM23	<p><i>Amend heading as follows;</i> Redevelopment of previously developed sites within <u>Maintaining the Openness of the Green Belt and Metropolitan Open Land.</u> <i>Amend first line of part A as follows;</i> A. The redevelopment or infilling of strategic and other previously-developed sites in the <i>(then as existing subsections a and b)</i>. <i>Amend subsection c as follows;</i> c the footprint, and <u>distribution and character</u> of existing buildings on the site; and <i>(then as existing subsection d)</i>. <i>Insert new heading before section B;</i> <u>Visual Amenity and Character of the Green Belt and Metropolitan Open Land and amend section B as follows;</u> <u>B</u> Proposals for the redevelopment or infilling of strategic and other previously-developed sites in the Green Belt and Metropolitan Open Land will also be required to have regard to <u>the visual amenity and character of the Green Belt and Metropolitan Open Land</u> <i>and delete subsections a, b and c.</i> <i>Delete existing sections C and D and insert new heading and section C;</i> <u>Partial Infilling or Redevelopment of Previously Developed Sites within the Green Belt</u> <u>C</u> In addition to (A) and (B) above, proposals for <u>partial infilling or redevelopment of previously-developed sites within the Green Belt and Metropolitan Open Land should be put forward in the context of a comprehensive, long term plan(s) for the site</u> ^[footnote] <u>as a whole.</u> ^[footnote] <u>The Site or Site Boundary means the whole site not just the area or areas the subject of existing or proposed development.</u> <i>Redesignate section E as D, inserting new heading;</i> <u>Inappropriate and Harmful Development in the Green Belt and Metropolitan Open Land</u></p>
MM172	74	5.9 – 5.11	<p><i>Delete second sentence and bullet points of paragraph 5.9 and all of paragraphs 5.10 and 5.11.</i></p>
MM173	75	5.12	<p><i>Amend as follows;</i> The National Planning Policy Framework (2012) confirms that the essential characteristics of Green Belts are their openness and permanence, but <u>use and development</u> may also harm other characteristics <u>including visual amenity, the setting of heritage assets and biodiversity values</u>. The same approach applies to Metropolitan Open Land. Proposals for the redevelopment or infilling of strategic and other previously developed sites in the Green Belt will therefore also be required to have regard to the following characteristics:-</p> <p>1 the visual amenity and character of the Green Belt and Metropolitan Open Land</p>
MM174	75	5.13	<p><i>Delete final two sentences and subsequent heading 2.</i></p>

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MM175	75	5.14	<p>Amend as follows; With regard to heritage assets within Harrow's Green Belt includes the original mansion houses and registered park and gardens of Bentley Priory and Grim's Dyke, historic farm complexes, cottages and a number of scheduled ancient monuments. As well as its crucial strategic role at Harrow on the Hill, Metropolitan Open Land also provides a setting for the historic Headstone Manor complex and forms a substantial part of the registered park and garden at Canons Park. Where the openness of the Green Belt and Metropolitan Open Land provides a context or setting for a heritage asset that contributes to the asset's significance, the Council will attach substantial weight to the preservation or enhancement of that openness.</p> <p>3 the contribution that the site and its surroundings make to the biodiversity.</p>
MM175 A	76	5.17	Delete paragraph 5.17
MM175 B	76	5.20	Delete paragraph 5.20
MM176	77	5.21	Delete paragraph 5.21
MM177	77	Following 5.21	<p>Insert box; <u>Key Policy and Guidance Links</u></p> <ul style="list-style-type: none"> • <u>NPPF paragraphs 80 and 89</u> • <u>London Plan Policy 7.17</u> • <u>Site Allocations DPD Sites GB1, 2, 3 and 4</u> • <u>Core Strategy Policy CS1F and CS7</u>
MM178	78	5.22	Delete final sentence and heading 1
MM179	78	5.23	<p>Amend fourth and subsequent sentences as follows; Outdoor sport facilities and passive recreational uses are more common in Metropolitan Open Land and provide for a more managed visual appearance. Proposals for uses that are not sympathetic to the existing character of Harrow's Green Belt and Metropolitan Open Land are likely to adversely impact its character and visual amenity, the The strategic significance of which to elevated parts of the Green Belt and Metropolitan Open Land to the amenity of the Borough is reflected in the Harrow Weald Ridge, Pinner Hill and Harrow on the Hill Area of Special Character designation, to which Policy DM6 also applies.</p>
MM180	78	5.24	Delete paragraph 5.24 and heading 2
MM181	78	5.25	<p>Amend third and subsequent sentences as follows; In addition to existing public access, there exists further opportunities to extend and improve Public open space and other sites with community access make and use of the Green Belt and Metropolitan Open Land, a number of which are to provide valuable facilities for outdoor sport and recreation. The Council will seek the retention and enhancement of access to sites within the Green Belt and Metropolitan Open Land where this already exists, and will attach substantial weight to the realisation of projects identified in Harrow's Green Grid project ^[footnote] for further improvements that achieve greater and</p>

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			<p>more inclusive public access.</p> <p>[footnote] <u>Further detail on the Harrow Green Grid is available on the Council's website: (insert link)</u></p> <p><i>And delete heading 3</i></p>
MM182	79	5.26	<p><i>Amend as follows;</i> London Plan Policy 7.22 <u>and the Council recognises the value of food production nearer to urban communities and particularly within the Green Belt and Metropolitan Open Land. The Council will support appropriate uses and development that enable existing agricultural activity to continue, as well as proposals for community gardens, allotments and orchards where there would be no conflict with the other criteria set out in this policy. Diversification of existing agricultural uses such as community gardens and allotments can help to sustain beneficial use of the Green belt and Metropolitan Open Land in a way that is compatible with the area's character.</u></p> <p><i>And delete heading 4</i></p>
MM183	79	5.27	<p><i>Amend as follows;</i> Heritage assets within Harrow's Green Belt and <u>Metropolitan Open Land contain a number of heritage assets such as include the original mansion houses and registered park and gardens of Bentley Priory and Grim's Dyke, historic farm complexes, cottages and a number of scheduled ancient monuments. Appropriate uses of Green belt and MOL could help to enhance the setting of these heritage assets.</u> Where Existing or previous uses of the Green Belt provide a context or setting for a heritage asset that contributes to the asset's significance the Council will attach substantial weight to the restoration or retention of those uses. In all other cases, proposed uses of Green Belt land should be compatible with the setting and protection of any heritage assets on or surrounding the site.</p> <p><i>And delete heading 5</i></p>
MM184	79	5.28	<p><i>Delete final two sentences and substitute;</i> Proposals should not harm the biodiversity value of the Green Belt and Metropolitan Open Land. Proposed uses must not harm the biodiversity value of designated sites and should sustain or enhance wildlife movement between sites within the Green Belt and Metropolitan Open Land. <u>Appropriate uses of land could help to support and extend the biodiversity value of Sites of Importance for Nature Conservation in the Green Belt and MOL.</u></p> <p><i>And delete heading 6</i></p>
MM185	79	5.29	<p><i>Delete final sentence and substitute;</i> The Council will attach substantial weight to proposals which mitigate existing levels of light, air and noise pollution within the Green Belt and Metropolitan Open Land, and will resist proposals that would harm the environmental quality of the Green Belt and Metropolitan Open Land by introducing significant new sources</p>

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			of pollution. Beneficial use of the Green Belt and MOL can give rise to opportunities to address existing adverse environmental quality and to enhance environmental quality in these regards.
MM186	80	5.30	Delete paragraph 5.30.
MM187	80	5.31	Amend penultimate sentence of submitted minor modification to substitute quantitative for qualitative.
MM188	80	DM25	Amend subsection B d to substitute reconfiguration for release.
MM189	81	5.35	Delete paragraph 5.35
MM190	82	5.37	Amend as follows; The reconfiguration of land identified as open space can be an appropriate mechanism for addressing identified deficiencies, and may provide windfall opportunities to enhance Harrow's Green Grid. It can help to reduce gaps in the accessibility of open space typologies, and can address qualitative functional issues as part of re-provision and help to increase the capacity of sites. Robust evidence will be needed to demonstrate that reconfiguration would deliver material improvements in the capacity, quality and accessibility of open space in the area which address identified deficiencies. In seeking to reduce deficiencies in one area, proposals should not result in significant new deficiencies elsewhere.
MM191	82	5.38 - 5.40	Delete paragraphs 5.38 to 5.40 and substitute; Ill conceived or poorly laid out and maintained open spaces can impact on their accessibility and use giving rise to underutilisation or anti-social uses. For the avoidance of doubt, the criteria in the policy for reconfiguration (B - a-d) as explained above are not mutually exclusive.
MM192	82	5.41	Amend as follows; In the longer term, the survival of local open space relies on the use and value attributed to them by the community. Functional buildings in open land The Core Strategy recognises that small scale ancillary facilities on open land can enable people users of the space, such as sports clubs, to continue to use and enjoy the space, and can contribute to local character. Examples include park pavilions, allotment sheds and changing accommodation. Proposals for buildings in open space will be supported where they are necessary to or would facilitate the proper functioning of the open space, or are ancillary to the use of the open space (such as sports club social facilities). However buildings should be appropriate in scale, informed by the function that the building is intended to perform and the number of potential users. Where the open space accommodates a number of user groups, the provision of a shared facility can overcome the need for several Sharing of facilities by multiple site users will be preferable in most instances to many smaller buildings, thereby making more efficient use of both land and buildings. S Insensitive design and siting of the building should ensure that buildings in open space do not ancillary facilities can detract from its the open character of the land; be detrimental to the environmental functions performed by the open space; and surroundings, and should avoid any potential for can conflict with other uses of the open space and neighbouring occupiers; and may limit potential future uses of the open

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			<u>space.</u>
MM193	83	5.42	<i>Delete paragraph 5.42</i>
MM194	83	5.43	<i>Delete final sentence</i>
MM195	83	5.44	<i>Amend as follows; Proposals for the change of use of open space from one typology to another should maintain the usefulness of the space relative to demand and, in so doing, can help to secure its future and address local deficiencies in certain types of open space provision. Conversely, the loss of certain types of open space, such as playing fields, can place increased demand on local facilities elsewhere, which may not have the capacity to accommodate further use or activity. Changes of use may also give rise to other impacts including accessibility, parking, traffic and reduced environmental value and capacity. The justification for the proposed use, and any uses to be lost, should be informed by an up to date assessment of need for the whole Borough which takes into account the quantity, quality and accessibility of the relevant typologies of provision. The change of use should not lead to any net loss of open space nor necessitate substantial new development within open space. Consideration will also be given to the impact, if any, on any environmental function performed by the open space.</i>
MM196	83	Following 5.44	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF paragraphs 73, 74 and 75</u> • <u>London Plan Policy 7.18</u> • <u>Core Strategy Policy CS1F and G</u> • <u>Harrow's Open Space, Sport and Recreation Study (2011)</u>
MM197	84	5.45	<i>Delete final sentence and substitute; For this reason Harrow's Core Strategy seeks the provision of new open space as part of major development proposals. In view of these findings the Council attaches great importance to ensuring that the open space needs of the Borough's growing population are met and that, wherever possible, existing shortcomings are addressed.</i>
MM198	84	5.46	<i>Delete final two sentences.</i>
MM199	85	5.47	<i>Amend as follows; Where The provision of major new open space is being provided, it should provides the opportunity to contribute positively to Harrow's Green Grid and the aims of the All London Green Grid SPG (2012) either by delivering components already identified or, in the case of unforeseen additions, exploiting the opportunity to further extend and link-up the Borough's network of green infrastructure. This may be particularly pertinent to the provision of new linear parks and green corridors and civic spaces within town centres, all of which provide both additional elements that are identified as generating open space requirements in the Open Space, Sport and Recreation Study (2011) but for which is it is not appropriate to set a standard for new provision.</i>
MM200	85	5.48 & 5.49	<i>Delete paragraphs 5.48 and 5.49.</i>
MM201	86	Following 5.49	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF paragraph 73</u>

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			<ul style="list-style-type: none"> • London Plan Policy 7.18 • Core Strategy Policy CS1F and G • Harrow's Open Space, Sport and Recreation Study (2011) • All London Green Grid SPG 2012
MM202	87	5.53	<i>Delete third and subsequent sentences.</i>
MM203	87	5.54	<p><i>Add to first sentence; as illustrated on the map below. Delete second sentence and final sentence. Insert map;</i></p> <p>GREATERLONDONAUTHORITY Sites of Importance for Nature Conservation</p>  <p>Scale 1:40000</p> <p>The Sites of Importance for Nature Conservation have been identified since 1988 using procedures which have not been updated to the standards of London. They are recommended for protection in planning. The boundaries and site profiles reflect the most recent consideration of each site. Details of their use are available from the Technical Site Creation London Authority. There is no information and plans may change as more information becomes available.</p> <p>PRODUCED BY CHARTERED SURVEYORS FOR GREATER LONDON AUTHORITY</p>
MM204	87	5.55	<i>Delete final sentence.</i>
MM205	88	Following 5.55	<p><i>Insert box; Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • NPPF paragraph 118 • London Plan Policy 7.19 • Core Strategy Policy CS1E and F • Harrow's Biodiversity Action Plan
MM206	88	DM28	<i>Delete subsection A a</i>
MM207	88	5.57	<i>Delete paragraph 5.57.</i>
MM208	89	5.58	<i>Delete final two sentences.</i>
MM209	89	5.59	<i>Amend first sentence as follows; Harrow's PPG 17 Sport, Recreation and Open Space Study (2011) highlighted existing and projected future shortfalls across a range of typologies of open space including allotments <u>which</u> the Borough's Biodiversity Action Plan identifies allotments as a locally important habitat. Delete second sentence.</i>
MM210	89	5.60	<i>Amend as follows;-All of the above measures will contribute to the restoration and creation of natural habitats on development sites and should inform the design and layout of major new development. Where it is not possible to restore or create significant components of the natural environment, and as a simple measure for non major development proposals, the installation of artificial habitats such as nesting and roosting boxes should be considered. The Harrow's Green Grid will form a part of the London wide integrated network of green</i>

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			<p>infrastructure. A network of <u>accessible open spaces linked by footpaths, cycleway and tree-lined avenues is planned. The more built-up character of many of the areas identified as being deficient in access to nature make the reduction of deficiency all the more challenging. Policy DM28 seeks to ensure that through a combination of more substantial enhancements as part of major development and many incremental improvements by small-scale developers and householders, this will ensure a valuable environmental legacy for future residents.</u></p>
MM211	89	5.61	<p><i>Delete paragraph 5.61</i></p>
MM212	89	Following 5.61	<p><i>Insert box; Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • <u>NPPF paragraph 118</u> • <u>London Plan Policy 7.19</u> • <u>Core Strategy Policy CS1E and F</u> • <u>Harrow's PPG17 Sport, Recreation and Open Space Study (2011)</u> • <u>Harrow's Biodiversity Action Plan</u>
MM213	89	DM29 and paragraphs 5.62 and 5.63	<p><i>Delete policy DM29 and paragraphs 5.62 and 5.63</i></p>
MM214	90	DM30	<p><i>Delete part A and redesignate subsequent sections</i></p> <p><i>Amend part C to read:—The design and layout of d Development proposals will be required to include should make provision for a scheme of hard and soft landscaping, including details of any boundary treatment, that:</i></p> <ol style="list-style-type: none"> a. <u>Is appropriate to the character of the area;</u> b. <u>Is well laid out in terms of access, car parking and the living conditions of future occupiers and neighbours;</u> c. <u>Achieves a suitable visual setting for the building(s);</u> d. <u>Provides for sufficient space for new or existing trees and planting to grow; and which</u> e. <u>Supports biodiversity. Proposals that leave insufficient space for an appropriate scheme of landscaping will be resisted.</u> <p><i>Delete final sentence of part D</i></p>
MM215	90	Following DM30	<p><i>Insert new paragraph; <u>Landscape proposals will usually be required for most developments, ranging from individual dwellings to large scale housing schemes, retail schemes, commercial and mixed-use sites. High quality landscape design can help to create spaces that provide attractive settings for both new and existing buildings, contributing to the integration of a development into the established character of an area. Landscaping schemes will be especially important on sites in prominent locations such as along main road frontages, important transport corridors, redevelopment sites and areas of high townscape or landscape quality. While the details required for a landscape scheme will vary according to the type and location of a development, landscaping should be included</u></i></p>

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			<u>as an integral part of the development proposal at an early stage. Careful consideration should be given to the existing character of a site, its topography and how any features such as surface treatments, furniture, lighting, boundary treatments and other structures are to be appropriately used and how planting and trees may mature over time. Poorly laid out landscaping can limit its amenity value and use, while leaving insufficient space for trees to grow can lead to the blocking of natural sunlight, issues of overhanging, subsidence and damage to foundations, resulting in applications in latter years for tree removal.</u>
MM216	90	5.64	<i>Amend as follows;</i> Trees and landscaping make a substantial positive contribution to the character of Harrow and are a significant component of the Borough's natural environment. <u>They help to reduce pollution, form screens to break up and soften the urban environment, integrate developments into the landscape and are invaluable to many forms of wildlife.</u> Veteran trees are given specific protection by tree preservation orders and, together with trees in conservation areas, are subject to special controls, <u>which protect them from inappropriate treatment or removal.</u> Wooded areas, street trees, individual or groups of garden trees and those in open spaces may still be of significant amenity value even if they do not merit the formal protection of a tree preservation order. The Council is preparing a tree strategy to safeguard, manage and increase tree stock within the public realm and also has regard to the Mayor's Green infrastructure & open environments: Preparing borough tree and woodland strategies SPG. The retention of good quality trees on proposal sites can help to integrate new development into the area, preserve local character and achieve sustainability benefits such as natural summer shading. However not all existing trees are worthy of retention and, in some instances, it may be more appropriate to include replacement or new tree planting as part of a development's comprehensive landscaping scheme.
MM217	91	5.65 – 5.70	<i>Delete paragraphs 5.65 – 5.70.</i>
MM218	92	Following 5.70	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF paragraph 118</u> • <u>London Plan Policy 7.21</u> • <u>Core Strategy Policy CS1E</u> • <u>London Mayor's Green Infrastructure & Open Environments: Preparing Borough Tree and Woodland Strategies SPG</u>
MM219	92	DM31	<i>Amend section A as follows;</i> Proposals for the provision of substantial hard surfacing of forecourts and front gardens should respect the character of the area and will be required to use permeable surfacing and, where appropriate, incorporate a scheme of soft landscaping.
MM220	92	5.71	<i>Delete final two sentences</i>
MM221	92	5.72	<i>Delete first two sentences</i>
MM222	92	5.73	<i>Delete final two sentences</i>

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MM223	93	Following 5.73	<i>Insert box; <u>Key Policy and Guidance Links</u></i> <ul style="list-style-type: none"> • <u>NPPF paragraph 57, 58 and 61</u> • <u>London Plan Policy 7.5</u> • <u>Core Strategy Policy CS1B</u>
MM224	95	6.1	<i>Delete final sentence and bullet points</i>
MM225	95	6.2	<i>Amend as follows; Harrow's Core Strategy (2012) requires the delivery of a minimum of 3,250 new homes on previously-developed land throughout the Borough (excluding the Harrow & Wealdstone Intensification Area^[Footnote a] over the period 2009/10 to 2025/26. <u>Policy CS1(I) seeks to ensure new development, as a whole, results in a mix of housing of different types, size and tenure across the borough and within neighbourhoods. This is supported by Policy CS1(J), which establishes a Borough-wide, affordable housing target of 40% from all sources of supply and, consistent with the London Plan, seeks the maximum reasonable amount of affordable housing on development sites with a capacity to provide ten or more homes (gross), having regard to a range of considerations. The Core Strategy also sets out the Council's strategic expectations on local character, open space, residential quality and inclusivity, transport, sustainability, waste and infrastructure.</u></i>
MM226	95	6.3 – 6.6	<i>Delete paragraphs 6.3 to 6.6 and substitute; <u>Within this policy framework, a key strand of sustainable development in Harrow is securing mixed communities that are inclusive to everyone and are appropriately mixed in terms of demographics, household types and tenure. London Plan Policy 3.8 (Housing choice) also refers to providing households with a genuine choice of housing.</u></i>
MM227	96	DM32	<i>Amend section A b as follows; the priority to be afforded to the delivery of <u>affordable family housing</u>; and</i>
MM228	96	6.7 – 6.14	<i>Delete paragraphs 6.7 to 6.14 and substitute;</i> <u>The projections for Harrow's housing needs are based on the West London Strategic Housing Market Assessment (SHMA) (2010). The SHMA estimates Harrow's housing requirements by dwelling size and tenure (owner-occupied, affordable and intermediate housing, including private rented) for the next five years. It does this by estimating recent and future household formation, in-migration, out-migration and projected household dissolution.</u> <u>The SHMA found that Harrow's existing housing stock is heavily skewed towards larger owner-occupied dwellings, and at 11.5% and 12.5% respectively, Harrow has the smallest stock of affordable and private rented dwellings in west London. In contrast to owner-occupied housing, over 60% of the affordable and private rented housing in the borough is in the form of flats.</u> <u>With regard to demand and supply, the SHMA demonstrates a significant shortfall of affordable housing of all sizes of accommodation, most notably two bedroom homes. It is</u>

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			<p><u>important to note however, that the shortage relative to supply of affordable housing is greatest for three or more bedroom properties. This shortage is made more acute due to right to buy and insufficient new build to replace it. Within Harrow and across London, there is a significant gap in the supply of housing that is suitable and affordable to families. This is reflected the strategic priority afforded to the provision of affordable family housing in the London Plan and in the SHMA modeling for Harrow, which places all of the requirement for 3 bedroom homes into the affordable and intermediate tenures reflecting the inability of market housing to cater for lower income larger households.</u></p> <p><u>In respect of the owner-occupied sector, in terms of size requirements, the data suggests a surplus for three and one bedroom homes whereas shortfalls exist for two and four or more bedroom homes. Conversely the model indicates there are surpluses in two and four or more bedroom homes and a shortfall of one and three bedroom homes in the private rented sector. In reality however, due to the acute requirement for affordable accommodation in the Borough, the surpluses recorded in the owner-occupied and private rented sectors are unlikely to be witnessed as households will be forced to spend a greater proportion of their income to access market housing.</u></p> <p><u>Given that new build housing only accounts for a fraction of the overall housing stock in the borough, and in normal market conditions will attract a premium price, the dynamics of Harrow's secondhand housing market is likely to be more important than new build completions to the housing mix of an area and affordable housing supply. In this context, and in the context of meeting Harrow's housing targets, including affordable family housing, the Council does not consider it justified to prioritize dwelling sizes for market housing and advocates a more balanced and flexible approach that, whilst having regard to identified needs, seeks to match housing mix to the location and nature of allocated sites, or sites likely to become available.</u></p> <p><u>The Core Strategy^[Footnote b] sets out the justification and requirements for affordable housing within the Borough. The London Plan applies a strategic affordable housing target of 60 per cent social/affordable rent and 40 per cent intermediate products. The provision of affordable housing remains a matter to be dealt with through Planning Obligations. The Planning Obligations supplementary planning document will detail local targets for the affordable housing mix to be sought as part of private residential development schemes. The target mix will be informed by the Council's Housing Strategy and will be updated, from time to time over the plan period, to respond to any change in needs that may occur.</u></p> <p>[Footnote b] Policy CS1 J and paragraphs 4.17 to 4.20</p>

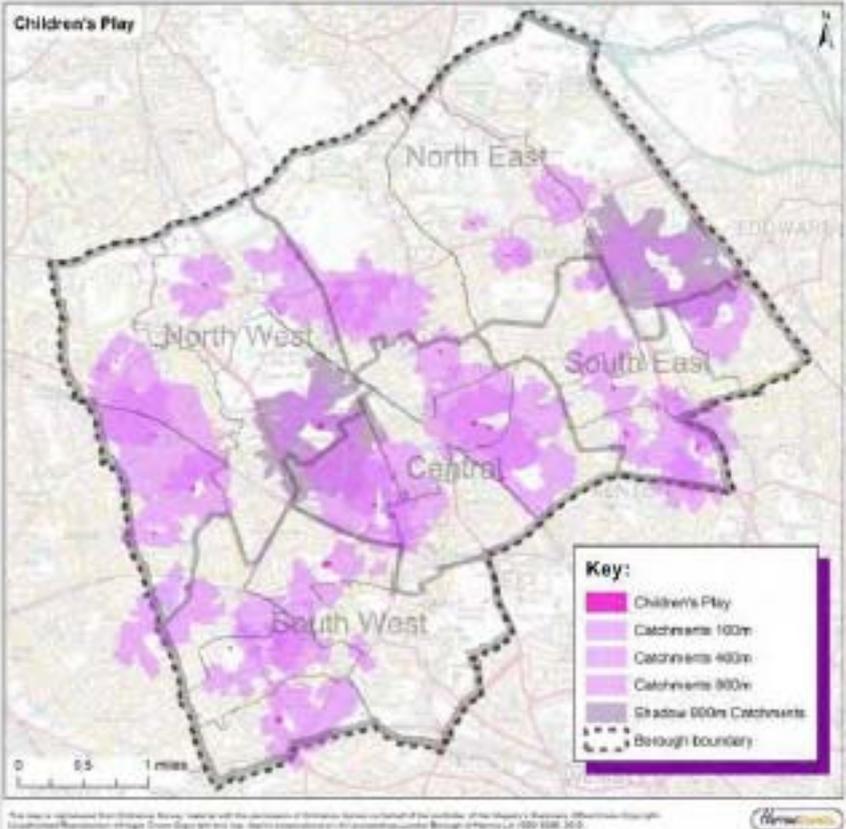
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MM229	98	Following 6.14	<p><i>Insert box; <u>Key Policy and Guidance Links</u></i></p> <ul style="list-style-type: none"> • <u>NPPF Paragraph 50</u> • <u>London Plan Policy 3.4, 3.8, 3.11, 3.12, 6.13</u> • <u>Core Strategy Policy CS1 I, J, and S</u> • <u>West London Strategic Housing Market Assessment (2010)</u> • <u>Harrow's Planning Obligations SPD</u>
MM230	98	DM33	<p><i>Amend section A as follows;—The Council will manage the Borough's supply of office space in accordance with the objectives of Core Strategy Policy CS1. Subject to Policy DM41, where offices are found to be redundant, the demolition and redevelopment of these office buildings will be supported. Where this is not feasible or viable, the conversion of offices to residential will be supported where: then continue as existing, amending subsection d as follows; proposed apartments <u>homes</u> should wherever possible be dual aspect (see Mayor of London's Housing SPG). A sole aspect apartment <u>home</u> into a parking court or other shared use rear area will generally be unacceptable.</i></p>
MM231	98	DM33	<p><i>Amend section B as follows; All conversions will be expected to meet design criteria in Policy <u>DM1</u>, and to accord with the London Plan's minimum space and lifetime <u>homes</u> standards.</i></p>
MM232	99	6.15	<p><i>Delete paragraph 6.15 and substitute; Paragraph 51 of the National Planning Policy Framework supports the conversion of commercial premises to residential use where there is an identified need for additional housing and no strong economic reasons why such development would be inappropriate. The Core Strategy, informed by evidence of the forecast future supply and demand balance for offices (and other forms of traditional employment floorspace), applies a 'monitor and manage' approach to the release of surplus commercial stock^[Footnote c]. This approach is necessary to ensure that space for local economic activity is retained and that opportunities for new provision as part of mixed-use schemes and employment-led regeneration can be realised. It is given effect, in respect of offices, by Policy DM41. Among the considerations for the release of surplus office premises is the age and condition of the building, recognising that many of Harrow's office buildings were constructed in the 1950s, 60s and 70s and are now both obsolete and economically & environmentally inefficient.</i></p> <p><i>[Footnote c] See Core Strategy Policy CS1.</i></p> <p><i>The Core Strategy acknowledges that town centre mixed use schemes and employment-led regeneration will make an important, additional contribution to Harrow's housing supply^[Footnote d]. Whilst retrofitting of obsolete buildings can help to improve their environmental performance and extend their useful life for office and other economic uses, experience shows that for residential use this type of proposal often leads to compromised internal layouts, poor amenity and haphazard adaptations to the building exterior. The Council considers that, when the principle of residential use has been accepted, it is preferable for redundant office buildings to be comprehensively redeveloped rather than converted.</i></p>

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			<p>[Footnote d] <u>See Core Strategy paragraph 4.14.</u></p>
MM233	99	Following 6.15	<p><i>Insert new box; Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • <u>NPPF paragraph 51</u> • <u>London Plan Policy 3.4, 3.5, 3.8, 3.9 and 6.13</u> • <u>Core Strategy Policy CS1 K, O and P.</u> • <u>West London Strategic Housing Market Assessment (2010)</u> • <u>Harrow's Residential Design Guide SPD (2011)</u> • <u>Harrow's Accessible Homes SPD (2010)</u> • <u>Mayor of London's Housing SPG (2012)</u>
MM234	99	DM34	<p><i>Amend section A as follows;</i></p> <p><u>Proposals for the conversion of houses and other residential premises to multiple units homes will be supported where they provide a satisfactory standard of accommodation and contribute positively to their surroundings. having regard</u></p> <p><u>Proposals will be required to:</u></p> <p><i>then delete subsections a to e and substitute;</i></p> <p><u>a comply with the London Plan minimum space standards;</u></p> <p><u>b wherever possible, ensure that homes are dual aspect (see Mayor of London's Housing SPG) and that the arrangement of rooms secures the separation of bedrooms and other room uses between homes within the development and neighbouring dwellings having regard to the adequacy of any measures to prevent noise transference;</u></p> <p><u>c achieve configurations that are practical and fit for purpose, having regard to circulation, storage space and room size and shape;</u></p> <p><u>d ensure that all habitable rooms have a satisfactory environment in terms of privacy, daylight, outlook and exposure to external noise;</u></p> <p><u>e make adequate arrangements for the provision of amenity space for future occupiers of the development (see Criterion B);</u></p> <p><u>f make adequate arrangements for the storage and collection of waste and recycling material generated by future occupiers of the development (see Criterion C) which does not give rise to nuisance to future and neighbouring occupiers;</u></p> <p><u>g ensure that the design of any external alterations does not detract from the appearance of the property or the streetscene and, wherever possible, retain a single door to the front elevation of dwellings in residential areas;</u></p> <p><u>h ensure that the balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hardsurfaced) does not detract from the appearance of the property or the streetscene;</u></p> <p><u>i make adequate provision for parking and safe access to and within the site and not lead to any material increase in substandard vehicular access; and</u></p> <p><u>j ensure that levels of external activity would not be detrimental to residential amenity and character.</u></p>

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			<p><i>Insert two additional sections B and C;</i></p> <p><u>B Where an existing garden is available, proposals must make this available for all future occupiers of the development, preferably through subdivision to form private amenity spaces for each home and accessible within the site boundary. Where, exceptionally, amenity space is to be provided communally, the Council will wish to be satisfied that there would be adequate privacy safeguards for the ground floor occupiers and that there will be robust, sustainable arrangements in place for managing the on-going maintenance responsibilities.</u></p> <p><u>C As part of the subdivision of rear gardens to form private amenity spaces for future occupiers, proposals must make provision for bin storage within those amenity areas and a suitable access for them to be wheeled to the forecourt for collection. Where such storage cannot be achieved (for example, terraced houses) there must be adequate space on the forecourt to accommodate the bins and provide suitable screening in conjunction with other forecourt uses.</u></p> <p><i>and redesignate existing sections B and C as D and E;</i></p>
MM235	99	6.16	<p><i>Amend final sentence as follows;</i></p> <p><u>They may also help to address the current imbalance in the supply of market housing between 3 bedroom homes (in surplus) and 2 bedroom homes (in deficit) also make a significant contribution to meeting certain housing needs, in particular affordable market and private rented accommodation, as identified in the West London Strategic Housing Market Assessment (2010).</u></p> <p><i>And add;</i></p> <p><u>Nevertheless experience shows that, working within the fabric of buildings designed to provide traditional family housing and (typically) constructed in the inter-war period or earlier, conversion proposals pose particular challenges in respect of internal layout, external appearance, the resulting relationship with neighbouring property and the potential to adversely impact upon the character of residential areas. Within the context of Policy DM1, which seeks to achieve a high standard of design, layout, privacy and amenity, this conversion policy provides bespoke criteria for conversions to ensure that these challenges are addressed in a manner that results in schemes of a standard that is consistent with policy objectives for new build residential development. Further guidance is provided in the Council's Accessible Homes and Residential Design Guide supplementary planning documents.</u></p>
MM236	100	6.17 – 6.35	<p><i>Delete paragraphs 6.17 to 6.35 including headings 1 to 5 and substitute;</i></p> <p><u>Over-intensive conversions of existing dwellings and other residential premises, such as maisonettes above shops, lead to</u></p>

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			<p><u>poor living conditions for future occupiers of the development, excessive internal noise transference and external activity for neighbouring occupiers, and frequently to a poor external environment that detracts from the appearance of the property and the character of the area. Appropriate application of design, layout, privacy and amenity considerations to conversion proposals, including the London Plan minimum space standards and the Lifetime and Wheelchair Home standards^[Footnote], will ensure properties suitable for conversion are converted, and that the resulting units will provide a satisfactory standard of accommodation that is compatible with the existing character of the area.</u></p> <p>^[Footnote]Policy CS1 K requires all new homes to meet Lifetime Home standards and for ten per cent of new homes to achieve the enhanced Wheelchair Home standards.</p> <p><u>As with new-build residential development, the Council expects conversion proposals to make adequate amenity space provision for future occupiers of the dwellings being created. Subdivision of existing gardens ensures that all homes within a conversion proposal benefit from an area of private amenity space and helps to avoid maintenance/responsibility problems in schemes that are too small for the viable establishment of a management company.</u></p> <p><u>Existing and new homes in the Borough are supplied with separate bins for general waste, recycling and composting. The segregation of waste by residents has enabled Harrow to achieve and sustain reductions in the amount of material sent to landfill sites in recent years. However conversions increase the number of bins to be accommodated within the curtilage of an existing dwelling, and where left on the forecourt they can be unsightly and cause obstruction. The accommodation of bins within the site therefore requires careful attention as part of design and layout of conversion proposals. The provision of bins within private amenity spaces usually offers the best solution in terms of householder responsibility for use, maintenance and waste segregation, and helps to avoid the excessive accumulation of bins on forecourts.</u></p> <p><u>Due to the relatively modest size of existing housing in Harrow, the creation of self-contained accommodation within the roofspace of dwellings frequently challenges the objectives of conversion policy. Experience indicates that the conversion of modest Metroland and other suburban houses to more than two flats frequently compromises one or more policy objectives, whilst some small terraced houses are incapable of being satisfactorily converted.</u></p>
MM237	103	Following 6.35	<p><i>Insert new box;</i></p> <p><u>Key Policy and Guidance Links</u></p> <ul style="list-style-type: none"> • <u>London Plan Policy 3.4, 3.5, 3.8, 3.9 and 6.13</u> • <u>Core Strategy Policy CS1 K</u> • <u>West London Strategic Housing Market Assessment (2010)</u>

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			<ul style="list-style-type: none"> • <u>Harrow's Residential Design Guide SPD (2011)</u> • <u>Harrow's Accessible Homes SPD (2010)</u> • <u>Mayor of London's Housing SPG (2012)</u>
MM238	103	DM35	<p><i>Amend section A as follows:</i></p> <p>Residential development proposals that provide appropriate amenity space will be supported. The appropriate form and amount of amenity space <u>should be informed by the Mayor's London Housing Design Guide</u> will be determined having and have regard to:</p> <p><i>Then as existing, amending subsection e as follows:</i></p> <p>the quality of the space proposed <u>including landscaping (see Policy DM30).</u></p>
MM239	104	6.36	<p><i>Add;</i> <u>The pattern of houses and gardens in many of Harrow's Metroland and other suburban areas form an important and positive attribute of residential character and quality. Related to the character and pattern of development, the prevailing form of amenity space influences the standard of privacy and amenity enjoyed by residents in different locations across the Borough. Harrow's Residential Design Guide SPD provides further detail on appropriate amenity space.</u></p>
MM240	104	6.37 to 6.47	<p><i>Delete paragraphs 6.37 to 6.47, including headings 1 to 5 and substitute;</i> <u>Harrow's Biodiversity Action Plan (2008) identifies residential gardens as a habitat of local importance to the Borough. Harrow's Green Grid sets out proposals and projects for linking existing open spaces to form a more integrated approach to green infrastructure across the Borough. Together, retention of residential gardens and the realisation of the Harrow Green Grid will support the movement and survival of wildlife through the urban environment. The London Housing Design Guide includes qualitative and quantitative amenity space standards that are applicable to registered social landlords and other GLA supported developments.</u></p>
MM241	105	Following 6.47	<p><i>Insert new box;</i> <u>Key Policy and Guidance Links</u></p> <ul style="list-style-type: none"> • <u>NPPF Core Principal 17</u> • <u>London Plan Policy 3.4, 3.5 and 3.6</u> • <u>London Housing Design Guide</u> • <u>Core Strategy Policy CS1 B, E, K and Z</u> • <u>Harrow's Residential Design Guide SPD</u> • <u>Harrow's Biodiversity Action Plan (2008)</u>
MM242	106	DM36 and paragraphs 6.48 to 6.52	<p><i>Delete policy DM36 and paragraphs 6.48 to 6.52</i></p>
MM243	107	6.53	<p><i>Amend as follows;</i> New residential development, especially schemes which include family housing, will result in an increase in child yield that will require additional play space provision. Requirements are based on the child yield of the development and the appropriate standard established through the <u>The Council's Open Space, Sports and Recreation Study (2011) identifies areas of deficiencies in play space provision</u></p>

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			<p><u>for all ages (see map following) and establishes a standard</u> This is currently a minimum <u>on-site provision</u> of 4 sq. m <u>per child, and which</u> needs to be seen in the context of a London wide target of 10 sq. m per child as set out in the Mayor of London's Children and Young People's Play and Informal Recreation SPG (2008/12). Where <u>it is not possible to provide sufficient on-site provision, is not appropriate a contribution for</u> off-site provision, <u>including by way of</u> the creation of new facilities; <u>or improvements to existing off-site provision should be considered;</u> <u>and/or an appropriate financial contribution secured by legal agreement towards this provision can be acceptable where it is demonstrated that it</u> <u>If it can be shown that this would fully satisfy the needs of the new development whilst and at the same time continuing to meet the needs of existing residents, an appropriate financial contribution can be secured by legal agreement.</u></p>
MM244	107	Following 6.53	<p><i>Insert map;</i></p> <p style="text-align: center;">Accessibility to Children's Playspace</p> 
MM245	107	Following 6.53	<p><i>Insert box; Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • <u>London Plan Policy 3.6</u> • <u>Mayor of London's Children and Young People's Play and Informal Recreation SPG (2012)</u> • <u>Core Strategy Policy CS1 G</u> • <u>Harrow's Open Space, Sports and Recreation Study (2011)</u>
MM246	108	6.54 and 6.55	<p><i>Delete paragraphs 6.54 and 6.55 and substitute;</i></p> <p>Poor health and disability can be affected positively or</p>

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			<p><u>adversely by housing circumstances and the care and support available. In an ageing society it is vital to consider the needs of those who are living longer and with limiting illnesses and disabilities. The location of sheltered or supported accommodation is important in ensuring that access to shops and services can be enjoyed by residents. Harrow's Housing Strategy 2012 and Supported Accommodation Strategy 2010 highlight the need for changes in the range of supported housing available to a number of client groups in Harrow over the medium to long term. This includes the need for a broader range of supported housing options, including a range of tenure types and levels of care and support, for older people, and those with learning disabilities, physical disabilities and mental health needs. Meeting lifetime and wheelchair homes standards can help ensure that people can live in their accommodation through changing circumstances for as long as possible.</u></p> <p><u>A delivery plan for the Supported Accommodation Strategy was prepared in 2011, and included the following key principles:</u></p> <ul style="list-style-type: none"> • <u>A need for flexible alternatives to residential care within the Borough as a means to support people to become more independent in more cost effective ways;</u> • <u>Existing in-house accommodation for people with learning disabilities to be remodelled in line with prior recommendations and additional supported accommodation options developed;</u> • <u>There is an under-provision of supported accommodation for people with mental health needs and additional provision needs to be developed; and,</u> • <u>Adults and Housing will undertake more work to establish plans for supported housing for people with lower level support needs as part of a longer-term prevention approach.</u> <p><u>Core Strategy Policy CS1 Z resists the loss of Community Facilities unless it is proven they are not needed.</u></p>
MM247	108	Following 6.55	<p><i>Insert box; Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • <u>London Plan Policy 3.12, 3.13, 3.51</u> • <u>Core Strategy Policy CS1</u> • <u>Harrow's Housing Strategy 2012</u> • <u>Supported Accommodation Strategy (2010)</u>
MM248	108	6.56 to 6.58	<p><i>Delete paragraphs 6.56 to 6.58</i></p>
MM249	109	6.59	<p><i>Amend first sentence as follows</i></p> <p>Large <u>Houses in Multiple Occupation (HMOs)</u> and <u>hostels (see glossary)</u> can contribute to the overall supply of cheaper accommodation, particularly for young professional people and</p>

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			those on low incomes. <i>And delete two final paragraphs.</i>
MM250	109	6.60	<i>Delete paragraph 6.60</i>
MM251	109	Following 6.60	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>London Plan Policy 3.2, 3.5, 3.8, 3.14</u> • <u>Core Strategy Policy CS1 I and K</u> • <u>Town and Country Planning (Use Classes) Order 1987 (as amended)</u> • <u>Harrow's Residential Design Guide SPD</u>
MM252	112	7.7	<i>Amend as follows;</i> Economic development is defined as development within the B Use Classes, public and community uses and main town centre uses Glossary, National Planning Policy Framework (2012) ^[Footnote a] . This is a much wider definition than has traditionally been applied in Harrow, where employment land has been safeguarded primarily for B1, B2 and B8 uses. The new definition supports the development of economic sectors that do not fall neatly into existing land use classifications and will enable diversification to take place in response to changes in market demands. Appropriate development that safeguards new jobs and which creates new jobs will be supported. However, main town centre uses are defined as: retail development including retail warehouses and factory outlets ^[Footnote b] ; leisure, entertainment and more intensive sport/recreation uses including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls ^[Footnote c] ; offices; and arts, culture and tourism development including theatres, museums, galleries and concert halls, hotels and conference facilities. ^[Footnote d] . <u>The NPPF, the London Plan and Harrow's Core Strategy are clear that town centre uses should continue to be directed to town centre locations. In accordance with the National Planning Policy Framework and the London Plan, and in the spirit of Harrow's spatial strategy, such uses will be directed to the Metropolitan, major, district or local centres as appropriate, and (where relevant) to sequentially preferable sites. Harrow's Core Strategy identifies Harrow town centre, within the Harrow & Wealdstone Intensification Area, as the Borough's principal location for growth in retail and leisure development, the emerging new hotel sector, and for consolidation and renewal of the local office market.</u> ^[Footnote a] <u>Glossary, National Planning Policy Framework (2012).</u> ^[Footnote b] <u>Including retail warehouses and factory outlets</u> ^[Footnote c] <u>Including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls.</u> ^[Footnote d] <u>Including theatres, museums, galleries and concert halls, hotels and conference facilities.</u>
MM253	112	DM40	<i>Delete heading; Honeypot Lane Strategic Industrial Location and substitute; Industrial and Business Use Land</i> <i>Delete section A and substitute; <u>Proposals for the</u></i>

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			<p><u>intensification, renewal and modernisation of existing industrial and business floorspace will be supported where the development complies with other relevant policy considerations and the new industrial or business floorspace allows for future flexibility, including future subdivision and / or amalgamation to provide for a range of accommodation, particularly for small businesses.</u></p> <p><i>Delete section B and heading</i></p> <p><i>Amend heading to section C as follows; Comprehensive Enabling-led Redevelopment of Business Use and Industrial & Business Use Floorspace Areas</i></p> <p><i>Delete first paragraph of section C and substitute;</i></p> <p><u>The Council will support proposals for enabling-led mixed use development where this is necessary to facilitate the intensification, renewal and modernisation of existing industrial and business floorspace. In addition to complying with other relevant policy considerations, proposals for enabling-led mixed use employment development must:</u></p> <p><i>Delete subsections a and b and amend subsection c as follows;</i></p> <p><u>it can be demonstrated that residential the enabling development is necessary to facilitate the delivery of the proposed industrial or business use floorspace a comprehensive scheme;</u></p> <p><i>Delete subsection d and substitute;</i></p> <p><u>maximise the amount of industrial or business floorspace to be re-provided as part of the mix;</u></p> <p><i>Insert new subsection e;</i></p> <p><u>achieve demonstrable improvements in the site's suitability and viability for continued industrial or business use activity having regard to the environmental improvements and the standard, type and flexibility of the accommodation to be provided; and</u></p> <p><i>Redesignate subsection e as f and amend as follows;</i></p> <p><u>ensure there would be no conflict between the residential enabling use and the industrial or business use activities economic uses within or surrounding the site.</u></p> <p><i>Delete section D</i></p> <p><i>Delete section E, including subsections a, b and c and</i></p>

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			<p><i>substitute;</i></p> <p>E. <u>The loss of industrial and business land and floorspace to non-employment uses will only be permitted having regard to Policy CS1 O and where:</u></p> <ol style="list-style-type: none"> a. <u>it can be demonstrated that a site is no longer suitable (see paragraph 7.X) and viable for its existing or an alternative industrial or business use; and</u> b. <u>a suitable period of continuous marketing activity has been undertaken without success.</u> <p><i>Delete sections F, G and H including subsections and substitute;</i></p> <p>G. <u>Where the loss of industrial or business floorspace can be demonstrated to the satisfaction of the Council, as required in (E) above, the Council will apply a sequential approach to redevelopment as follows:</u></p> <ol style="list-style-type: none"> i. <u>proposals for alternative employment uses, excluding main town centre uses;</u> ii. <u>proposals for strategic community infrastructure not appropriate to town centre locations; and</u> iii. <u>mixed use proposals that include and facilitate a significant element of employment generating uses and/or community uses.</u>
MM254	114	7.9 to 7.27	<p><i>Delete paragraphs 7.9 to 7.27 and substitute;</i></p> <p><u>Over recent years the Borough has experienced a trend of continual losses in land and floorspace for industrial and business activity. Numerous small, incremental losses have been supplemented by the loss of some larger sites to residential use including part of the Honeypot Lane Strategic Industrial Location at Stanmore, and the highly accessible Biro House site in South Harrow.</u></p> <p><u>As with much of north and west London, Harrow is identified as an area for 'limited transfer' of industrial land to other uses in the London Plan. This requires the Council to carefully monitor and manage its release of industrial and business land to ensure the borough has a sufficient stock of land and premises to meet its future needs and the efficient functioning of the local economy including, maintaining a diversity of job opportunities for residents. Harrow's Employment Land Study (2010) provides an assessment of the potential balance of supply and demand for employment land and floorspace over the period 2007 to 2026. The findings of the study forecast a continued decline and lower land requirements, in quantitative terms, for industrial and business use land across the borough. However, the market analysis indicates a reasonably healthy industrial market, with low vacancy and a shortage of</u></p>

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			<p><u>more modern, small to medium sized industrial units. Thus, while industrial employment may be in longer-term decline, and older industrial space is becoming redundant, this does not necessarily mean there is no requirement for new industrial space in the future. However, a significant proportion of Harrow's existing employment sites comprise traditional industrial areas with some older premises unsuited to modern needs or in poor condition, but with potential for renewal or intensification. Based on the recommendations of the study, and the fact that the loss of industrial and business land is in effect irreversible, the Council will seek to retain these sites in industrial and business use ^[footnote a] and will support proposals to intensify, renew and modernise existing premises and use to meet the needs of local businesses and, in particular, demand for premises suitable for smaller enterprises.</u></p> <p>[footnote a] <u>Use Classes B1c, B2 and B8.</u></p> <p><u>Where market drivers, in themselves, are not sufficient to promote the gradual upgrading and modernisation of poorer quality sites and premises, enabling development can provide a catalyst for change and allow these sites to continue to make a positive contribution to meeting the Borough's future industrial needs.</u></p> <p><u>While the aim of Policy DM40 (Correct numbering) is to retain sites in industrial and business use, the Council acknowledges that the predicted oversupply of industrial space, in quantitative terms, creates potential for releasing some employment land to other uses. In accordance with Core Policy CS10, and in the context of Harrow's modest overall stock of industrial and business land, the quantitative release of land is to be restricted to that which is inherently unsuitable for continued industrial and business uses. In determining whether a site is no longer suitable, the following factors are applicable: Strategic and local road access:</u></p> <ol style="list-style-type: none"> 1. <u>Accessibility to public transport and services;</u> 2. <u>Compatibility of adjoining uses;</u> 3. <u>Internal environment, including the size, quality and condition of existing buildings and potential for refurbishment or subdivision;</u> 4. <u>Site size and potential development constraints;</u> 5. <u>Attractiveness to the market, including vacancy and market activity on sites; and</u> 6. <u>Any other relevant, up-to-date market intelligence</u> <p><u>Where it has been demonstrated that the premises and land are no longer suitable to continued industrial and business use, such sites offer the potential, through refurbishment, adaptation, or redevelopment to meet requirements for wider economic uses and the provision of strategic social infrastructure including health, education, emergency services and other community uses. However, the introduction of new</u></p>

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			<p><u>uses must be appropriate to the location both in terms of the scale of the development and the nature of the activities and in line with other policies of the Development Plan.</u></p>
MM255	118	Following 7.27	<p><i>Insert box; Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • <u>NPPF Paragraph 21 and 22</u> • <u>London Plan Policy 2.17, 4.4</u> • <u>Core Strategy Policy CS1 O and P</u> • <u>Harrow's Local Economic Assessment</u> • <u>Harrow's Employment Land Study (2010)</u> • <u>Harrow's Available Business Premises surveys (Updated bi-yearly)</u> • <u>Harrow's Authorities Annual Monitoring Report</u>
MM256	118	DM41	<p><i>Delete heading; Town Centre Offices and Northolt Road Business Use Area and substitute; Office Development</i></p> <p><i>Add new section;</i> <u>Proposals for new office floorspace within town centres, including proposals within mixed use schemes, will be supported where the scale of provision is appropriate to the role and function of the town centre and the development complies with other relevant policy considerations.</u></p> <p><i>Add new heading and amend former section A as follows;</i></p> <p><u>Office Provision through Mixed-Use Conversion or Redevelopment</u></p> <p>Proposals for the redevelopment or change of use of purpose-built offices located in town centres and the Northolt Road business use area will be permitted where <u>resisted unless</u> it can be demonstrated that <u>the building is no longer fit for office occupation having regard to:</u></p> <ol style="list-style-type: none"> a. the building is no longer fit for office occupation having regard to the level and duration of vacancies within the building the age and condition of the building; and the needs of potential occupiers in the local office market; and b. an assessment of demand and supply demonstrates that there is a surplus of office space throughout the Borough, taking into account any unimplemented planning permissions the age and condition of the building and potential for refurbishment; c. <u>the existing layout of the building and potential for adaptation to smaller/more flexible office units;</u> d. <u>the needs of potential occupiers in the local office market; and</u> e. <u>evidence of continuous and suitable marketing over a 12 month period.</u> <p><i>Amend section B as follows;</i></p> <p>B. Proposals for the comprehensive redevelopment or change of use of existing buildings of <u>Where the existing office</u></p>

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			<p>floorspace is greater than 1,000 or more square metres of office floorspace, and it can be demonstrated that the building is no longer fit for office occupation, as required in (A) above, proposals for mixed use development will be required that: to make viable provision for replacement office space or other appropriate economic uses. The scale of replacement office or other economic uses required will be informed by the role and function of the town centre, the proposal's overall contribution to employment, the employment yield of the floorspace in the existing building, the value of any community benefits including the provision of affordable housing, and development viability.</p> <p>a. <u>includes new employment floorspace providing at least 40% of the existing provision, unless it can be demonstrated that such level of provision would not be viable;</u></p> <p>b. <u>includes an element of flexible, adaptable office floorspace capable of meeting the changing needs of small/business units.</u></p> <p><i>Amend section C as follows;</i></p> <p>The redevelopment or change of use of offices outside of designated town centres and the Northolt Road business use areas will be permitted where <u>the building has been vacant for more than 12 months and there is genuine evidence that all opportunities to re-let the accommodation have been fully explored, including evidence of suitable marketing over a 12 month period an assessment of demand and supply demonstrates that there is a surplus of office space in the Borough, taking into account any unimplemented planning permissions.</u></p>
MM257	119	7.29	<p><i>Amend final two sentences as follows;</i> The stock suffers high levels of vacancy <u>due to the general over-supply of large, outdated office space that is not suited to meeting local needs. The high levels of vacancy mean that while comparatively low rental values are comparatively low, which in turn discourages investment and renewal.</u> Speculative provision of new offices to meet the needs of Harrow's local market and achieve modest, longer term growth in office floorspace, <u>as indicated in the Employment Land Review (2010), is therefore unlikely in the short term.</u></p>
MM258	119	7.30	<p><i>Amend as follows;</i> The Borough's Core Strategy seeks to focus consolidation and renewal of office space upon Harrow town centre, both to reflect its Metropolitan centre status and where the potential of mixed-use development to help deliver significant components of replacement floorspace is greatest. However, there will continue to be a role for office space beyond Harrow town centre and it is therefore necessary <u>to provide for this and to manage the release of floorspace pursuant to the spatial strategy's with the aim of reducing overall levels of vacancy in the Borough, securing the retention of existing space which continues to be fit for purpose, and</u></p>

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			encouraging the provision of new space which supports the proper functioning of town centres.
MM259	119	7.31	<i>Delete heading and amend as follows;</i> The Borough's town centre network, and the Northolt Road business use area, are shown on the Harrow Policies Map. Proposals for the redevelopment or change of use of purpose built offices in these locations will be managed, consistent with Harrow's spatial strategy, to ensure that the needs of the office market beyond Harrow town centre are met and to reduce surplus throughout the Borough. The aim of the policy in respect of these areas is to release stock which no longer meets the needs of office occupiers and to resist the displacement of active office occupiers to higher value uses. The diversification of offices for other economic development uses, where these are appropriate, will be supported. Proposals for the conversion of small office premises above shops (i.e. not in purpose built blocks) will be assessed on their own merits and not against the criteria set out in the policy.
MM260	119	7.32 and 7.33	<i>Delete paragraphs 7.32 and 7.33</i>
MM261	120	7.34	<p><i>Delete heading and amend as follows;</i></p> <p>Renewal of Local Office Supply</p> <p><u>Harrow's Local Economic Assessment (2011/12) cites evidence that points to potential local employment growth in a range of sectors^[Footnote b] which include, but are not limited to, activities traditionally accommodated in office-type spaces. While the above provisions will enable the release of surplus and redundant office stock but it will not encourage the supply of new office floorspace for office or other employment generating uses, which that are required to support local economic development . Proposals for the redevelopment or change of use of buildings involving 1,000 square metres or more office space should therefore be mixed use to include some floorspace which contributes to economic development. Therefore, in addition to managing the release of old, outdated office stock, on sites that have a significant level of existing provision (over 1,000 square metres) the aim of the policy is also to secure the re-provision of new floorspace to support local demand for offices or other employment related uses. Mixed use redevelopment and changes of use can help to secure the re-provision of office floorspace that is better tailored to meeting local demand, supports employment diversification, and maintains the vibrancy and viability of Harrow's town centres in accordance with the objectives of Harrow's Core Strategy^[Footnote c]. Where appropriate and justified, some of the employment floorspace to be re-provided may be given over to community uses where this aids in town centre vitality and meets locally identified needs (see Policy DM57).</u></p> <p>[Footnote b] These include: accommodation and food service</p>

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			<u>activities; information and communication; professional, scientific and technical activities; administrative and support services; education; health; and arts, entertainment and recreation. See paragraph 3.14 of the Assessment.</u> [Footnote c] <u>See Strategic Objectives 2 & 4; Overarching Policy Objectives 11 & 12; Policy CS1 P; and paragraph 4.26.</u>
MM262	120	7.35 and 7.36	<u>Delete paragraphs 7.35 and 7.36 and substitute; The re-provision or retention of 40% of the existing floorspace is flexible and will vary between sites. Nonetheless a figure is required to provide an indication of the level of employment floorspace required to assist developers in bringing forward proposals.</u>
MM263	120	7.37	<u>Delete heading and amend as follows;</u> Other Offices <u>Outside of town centres and the Northolt Road business use area, where a site is unsuitable for continued employment or commercial use, it is appropriate that it be released for other forms of sustainable development. or other employment generating uses then redevelopment or change of use of redundant offices will be permitted where evidence shows that there is a material surplus of office space throughout the Borough, in terms of vacancy levels and taking into account pipeline changes in supply arising from unimplemented planning permissions.</u>
MM264	120	Following 7.37	<u>Insert box; Key Policy and Guidance Links</u> <ul style="list-style-type: none"> • <u>NPPF Paragraph 26</u> • <u>London Plan Policy 4.3</u> • <u>Core Strategy Policy CS1</u> • <u>Harrow Employment Land Study (2010)</u>
MM265	121	DM42 and paragraphs 7.38 - 7.42	<u>Delete policy DM42 and paragraphs 7.38 to 7.42, including headings.</u>
MM266	123	DM43	<u>Amend section A as follows;</u> Home working and ancillary economic activity at home by the occupiers of residential property will be permitted where the applicant can demonstrate that <u>the property would remain substantially residential in character and occupation having regard to:</u> <u>Delete subsections a, b and c and substitute;</u> <u>(a) the number of employees on the site;</u> <u>(b) how they are accommodated within the premises during working hours; this will include consideration of full time and part time employees; and</u> <u>(c) the extent to which they are present on the site during operational hours.</u> <u>Insert additional sections B and C;</u> <u>There must be no detrimental impact upon the amenities of neighbouring occupiers by reason of noise, pollution, levels of</u>

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			<p><u>internal or external activity, traffic and parking; and the proposal must not undermine Harrow's spatial strategy.</u></p> <p><u>Retail and wholesale activities from residential property are not consistent with residential amenity and character and will be resisted.</u></p> <p><i>and redesignate former sections B and C as D and E;</i></p>
MM267	123	7.43	<p><i>Amend as follows;</i> Home working enables many people to strike a balance between their domestic and professional lives, and by obviating the need for expensive and time consuming commutes can improve quality of life. For others, starting a business at home can be the first entrepreneurial step towards the creation of a successful economic enterprise. <u>Harrow's Economic Development Strategy (2011/12) states that there are currently over 10,000 small and medium sized businesses in the Borough, and it is likely that working from home is an important component of many of these companies' business model.</u> Home working and ancillary economic activity at home has a range of economic and environmental benefits which merit support ^[Footnote d]. <u>In many cases working from home will not constitute a material change of use requiring planning permission.</u> However, <u>where an existing economic activity at home expands to become a substantial or the principal use of the property, large scale and intrusive activities are unlikely to be appropriate within this can conflict with neighbouring residential uses areas and is potentially at odds with the Borough's spatial strategy.</u></p> <p>^[Footnote d] <u>The Employment Land Study (2010) cites home working as one of the reasons for improvements in office employment density efficiency and a driver for 'smart' or 'spaceless' growth, where economic growth is achieved without corresponding increases in demand for employment space (paragraph 6.35).</u></p>
MM268	123	7.44	<p><i>Delete paragraph 7.44</i></p>
MM269	123	7.45	<p><i>Amend as follows;</i> Where planning permission is required, proposals will be considered against the criteria set out in this policy. The aim of this policy is to ensure that whilst home working can take place, Harrow's residential areas remain attractive and peaceful places to live, and that the living conditions of those surrounding the activity are not adversely affected. The property should remain substantially residential character, meaning that it should still be mainly occupied for residential purposes and that there should be no significant, external indication of the commercial use. On going use of garden areas or outbuildings for significant levels of commercial storage and large or illuminated signs can have a significant affect on <u>are unlikely to be consistent with residential character and amenity. Proposals for advertisements will be assessed against Policy 5. Activities which give rise to noise, odour, effluent, vibration, dust or other noxiousness emissions will be resisted. Over prolonged</u></p>

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			periods, abnormally high levels of activity within the building or that associated with deliveries and business callers can cause disturbance and nuisance, and will be indicative of a scale of activity not appropriate in a residential area. Similarly, proposals should not generate high levels of traffic or inconsiderate parking activity that could cause a nuisance to, or obstruct the movements of, neighbouring residents.
MM270	124	7.46 – 7.48	<i>Delete paragraphs 7.46 to 7.48</i>
MM271	124	7.49	<i>Delete reference to (interim edition) and final sentence.</i>
MM272	124	7.50	<i>Delete all after second sentence.</i>
MM273	125	7.51	<i>Delete paragraph 7.51</i>
MM274	125	Following 7.51	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF Paragraph 50</u> • <u>London Plan Policy 3.14, 4.6</u> • <u>Core Strategy Policy I</u> • <u>London Housing Design Guide</u>
MM275	125	DM44	<i>Delete parts B and C</i>
MM276	126	7.54	<i>Amend as follows; The Borough's spatial strategy directs major new hotel and leisure development to Harrow town centre, reflecting its Metropolitan centre status and in support of the Harrow & Wealdstone Intensification Area objectives. This policy applies to proposals for hotel development and tourist attractions throughout the rest of the Borough, <u>the Council will expect proposals for hotel development to locate in town centres to avoid impacts on residential amenity and to benefit from good public transport links and local services.</u></i>
MM277	126	7.55 – 7.57	<i>Delete paragraphs 7.55 to 7.57</i>
MM278	126	7.58	<i>Amend as follows; Guest houses and bed & breakfast accommodation help to diversify the supply of visitor accommodation and can offer a more homely, personal environment than that provided by larger hotel chains. Such uses also provide business opportunities for residents that contribute to local economic activity. However care is needed, particularly in residential areas, to balance the impacts of guest house and bed & breakfast uses with the amenity of neighbouring occupiers and the character of the area. The size and layout of the building should be suitable for the proposed use and in particular the number of guest rooms; over-intensive use of a property is likely to give rise to disturbance to neighbouring occupiers and could generate an excessive level of external activity by visitors' arrival and departure. Even where individual proposals are acceptable, an over concentration of guest houses and bed & breakfast accommodation in a road or locality can lead to unacceptable cumulative effects. and should be avoided. Proposals should have good access to public transport, or other more sustainable modes of travel, and where car parking is provided there must be safe access to and from the site for the anticipated number and type vehicles.</i>

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MM279	127	7.59	<i>Delete paragraph 7.59</i>
MM280	127	7.60	<i>Amend as follows; The Council wishes to encourage tourism that does not harm the environment or residential amenity. Proposals that enable land and buildings to be used for the benefit of both visitors and residents are especially welcome. Scope for building new tourist attractions in the Borough is limited. To make the best use of resources, and <u>New tourist development can</u> widen the cultural and recreational opportunities available to local people for use and employment, <u>making the best use of resources.</u> flexibility will be sought. This might enable the re-use of buildings, innovative combinations of uses or facilities designed to be adaptable and able to accommodate different activities in the future. Extension and improvement of existing facilities and provision of new facilities in sustainable locations will be encouraged.</i>
MM281	127	Following 7.60	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF Paragraph 23</u> • <u>London Plan Policy 2.7, 4.5</u> • <u>Core Strategy Policy CS1</u>
MM282	127	DM45 and paragraphs 7.61 – 7.64	<i>Delete policy DM45 and paragraphs 7.61 to 7.64</i>
MM283	130	8.4	<i>Add; <u>but recognises that such long-range forecasts are susceptible to a great deal of uncertainty – not least because projected surplus expenditure is primarily attributable to projected growth in per capita spending - and should therefore be used cautiously</u>^[Footnote a]. More recent data indicates that <u>real household disposal incomes declined by 1.2% in 2011 and a further decline of 1% is estimated for the first six months of 2012</u>^[Footnote b]. In this context the GLA has commissioned <u>research to update its own consumer expenditure estimates</u>^[Footnote c] <u>to be published Spring 2013. Pending a review of Harrow's retail floorspace projections, to be undertaken in 2014/15</u>^[Footnote d], the Council considers that the <u>medium-range projections to 2020 provide a more robust basis for planning new retail development in the Borough. Sites with planning permission and others allocated in the Harrow & Wealdstone Area Action Plan and Site Allocations DPD therefore provide sufficient land to meet retail development needs to 2020.</u></i> <p>^[Footnote a] <u>See paragraphs 17.2, 18.3, 18.5 and 18.35 of the Retail Study.</u></p> <p>^[Footnote b] <u>Experian Retail Planner Briefing Note 10.1 (Sept 2012) cited in the Mayor of London's Town Centres draft supplementary planning guidance 2013 (paragraph 2.1.2).</u></p> <p>^[Footnote c] <u>See the Mayor of London's Town Centres draft supplementary planning guidance 2013 (paragraph 2.1.3).</u></p> <p>^[Footnote d] <u>In accordance with the recommendation contained at paragraph 18.36 of the Retail Study (2009).</u></p>
MM284	131	8.5	<i>Delete paragraph 8.5</i>

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MM285	131	DM46	<p><i>Designate unlabelled section following section A b as section B and amend as follows;</i></p> <p>Proposals on edge-of-centre sites will be permitted where it has been demonstrated through site search and selection that the location is the most sequentially preferable that is available, and that there would be no harm to town centres <u>and neighbouring residential amenity (see policy DM1) and the proposal accords with (a) and (b) above.</u></p> <p><i>Redesignate subsequent sections</i></p> <p><i>Amend section B (to be redesignated C) as follows;</i></p> <p>Proposals for new retail, <u>leisure</u> and cultural development in out of centre locations, including proposals for extensions, will only be permitted where <u>there is no harm to neighbouring residential amenity (see policy DM1) and where:</u> <u>a flexibility it has been demonstrated that all reasonable alternatives for the proposal have been explored in terms of scale, format, car parking provision and scope for disaggregation in the format of the proposed development;</u></p> <p><i>then b, c and e as existing, deleting subsection d and adding new subsection as follows;</i></p> <p><u>proposals over 2,500 square metres would demonstrably not harm centres within their catchment area.</u></p> <p><i>and delete former section C</i></p>
MM286	131	8.6	<i>Delete paragraph 8.6</i>
MM287	132	8.8	<i>Delete final sentence including footnote and substitute; <u>Although Harrow's Retail Study (2009) has identified scope for retail growth in the borough, this has not been disaggregated to individual centres and so the policy is qualified in all cases by a need to assess any harm which may be caused by the impact of a proposal.</u></i>
MM288	132	8.9	<i>Delete third, fourth and final sentence. Amend fifth sentence as follows; Attention will also be paid to the format <u>and scale</u> of the proposed development to consider whether sufficient flexibility has been exercised in the assessment of how other sequentially more preferable sites could meet the <u>any</u> identified need.</i>
MM289	132	8.10 and 8.11	<i>Delete paragraphs 8.10 and 8.11</i>
MM290	133	8.12	<i>Amend as follows; <u>Useful guidance on impact assessment is contained in the DCLG Practice guidance on need, impact and the sequential approach (2009) remains extant following the publication of the National Planning Policy Framework (2012) and the consequent revocation of the previous suite of planning policy statements. The guidance provides detailed</u></i>

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			advice on the application of the sequential approach and impact assessment for retail and other development relevant to this policy. In the event that the 2009 guide is revoked and not replaced, the Council will publish local guidance to this end.
MM291	133	Following 8.12	<p><i>Insert box; Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • <u>NPPF Paragraph 23, 24, 26 and 27</u> • <u>London Plan Policy 2.15, 4.7 and 4.8</u> • <u>Core Strategy Policy CS1 L and M</u> • <u>DCLG Practice guidance on need, impact and the sequential approach (2009)</u> • <u>Harrow's Retail Study (2009)</u> • <u>Harrow's Town Centre Shopping Frontage Surveys (produced annually)</u>
MM292	133	8.13	<i>Delete second clause of final sentence.</i>
MM293	133	DM47	<p><i>Amend as follows;</i></p> <p>A. Within the primary shopping frontages of district centres as defined on the Harrow Policies Map, the use of ground floor premises for retail, financial & professional activities, restaurants & cafés and pubs & bars will be permitted provided that:</p> <p>a. <u>Policy DM50 applies, or;</u></p> <p>b. the length of primary frontage in non-retail use at street level in the centre (including any extant planning permissions) would not exceed 25% unless it can be demonstrated that the proposed use would make a significant contribution to the centre's vitality and viability <u>or;</u></p> <p>b <u>c.</u> the proposal would not result in a concentration of more than three unit frontages in non-retail use;</p> <p>e <u>d.</u> the use would not create inactive frontage during the day; and</p> <p>d <u>e.</u> the use would not be detrimental to the amenity of neighbouring occupiers (<u>see Policy DM1</u>) or highway safety.</p> <p>B. Proposals for other uses within primary shopping frontages will not be permitted unless <u>policy DM50 applies, or</u> it can be demonstrated that the use would be directly related to shopping trips and would support the retail function of the district centre.</p>
MM294	134	8.15	<p><i>Amend as follows;</i> The primary shopping frontages of district centres will therefore continue to be safeguarded for retail (Class A1), financial and professional services (Class A2), restaurants and cafés (Class A3) and pubs and bars (Class A4), being the main activities which sustain town centres by attracting shoppers, workers & visitors. The retention of a critical mass of shopping uses remains the best way to sustain vitality and viability at the heart of district centres and to ensure that the Borough's town centre retail capacity is properly protected. The right balance of retail and other appropriate uses will ensure that district centres continue to function as interesting and attractive destinations for shoppers. The National Planning Policy Framework (2012) defines primary shopping frontages as those likely to include a high proportion of retail uses, which may include food, drinks,</p>

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			<p>clothing and household goods^[Footnote a], and states that local planning authorities should set policies for uses within town centres based on a clear definition of these and other frontages^[Footnote b]. Harrow's Retail Study (2009) concluded that there is a continuing need to monitor uses within the shopping frontages of town centres and to protect Class A uses^[Footnote c]. The Study went on to suggest changes to frontages within a number of the Borough's town centres, which have been taken forward through the Harrow & Wealdstone Area Action Plan and the Site Allocations DPD. The Council considers that 25% is a reasonable indicator of the point at which the high proportion of retail uses appropriate to primary shopping frontage may be threatened, having regard also to the vitality and viability of the town centre concerned or (if relevant) Policy DM50. For these reasons, the policy seeks to limit the proportion of non-retail activity in the primary frontage within each district centre to 25% of that frontage, and to manage the distribution of activities within primary frontage so as to avoid more than three continuous units of non-retail use. To prevent the accumulation of a pipeline of non-retail uses that could exceed the 25% ceiling within primary frontages, the Council will take into account any relevant extant planning permissions. However, in certain cases these limits may be breached where the proposal would significantly help the vitality and viability of a centre, particularly in cases where a unit has been vacant for a substantial amount of time, or the proposal can clearly demonstrate that it would attract a significant number of people to the centre who otherwise would not have visited. Further Detail on the method for applying policies on the change of use of shops is provided at Schedule 2.</p> <p>^[Footnote a]See NPPF Annex 2: Glossary., and states that local planning authorities should set policies for uses within town centres based on a clear definition of these and other frontagesSee NPPF paragraph 23.</p> <p>^[Footnote b] See NPPF paragraph 23.</p> <p>^[Footnote c]See Harrow Retail Study (2009) paragraph 18.32.</p>
MM295	134	8.16	<p><i>Amend as follows;</i> Estate agencies, banks, building societies and other Class A2 uses are all a normal part of the streetscene in shopping areas. Together with cafés, restaurants and public houses that are open during the day, these uses contribute to the creation of a lively and varied frontage. By contrast take aways <u>that are not open during the day</u> (unless forming a part of a café or restaurant use) are rarely less likely to be connected with shopping trips and more frequently trade as evening rather than daytime activity resulting in inactive frontage during the day. for these reasons wholly take away uses will be resisted within the primary shopping frontages of district centres^[Footnote]. All other uses that are permitted by this policy should, by definition, create active daytime frontages. Any proposal that would create inactive daytime frontage within a primary shopping frontage will be resisted.</p> <p>^[Footnote] Nevertheless, in the event of a take away proposal</p>

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			within designated primary shopping frontage the Council will consider the associated environmental, amenity and highway impacts as set out in paragraph 8.22 of the reasoned justification to Policy 48.
MM296	135	8.17	<i>Delete final two sentences.</i>
MM297	135	8.18	<i>Delete paragraph 8.18</i>
MM298	135	Following 8.18	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF Paragraph 23, 24, 26 and 27</u> • <u>London Plan Policy 2.15, 4.7 and 4.8</u> • <u>Core Strategy Policy CS1 L and M</u> • <u>Harrow's Retail Study (2009)</u> • <u>Harrow's Town Centre Shopping Frontage Surveys (produced annually)</u>
MM299	135	DM48	<i>Add to both subsections a and b; or Policy DM50 applies; and add (see Policy DM1) to subsection d and add new section B; <u>The Council will give consideration to the provision of community facilities within secondary frontages where it can be demonstrated that these will be open to visiting members of the public and would support the vitality and viability of the centre (for example, by encouraging linked trips to other shops and services within the centre), and subject to criterion (d) above.</u></i>
MM300	135	8.19	<i>Amend as follows; In addition to the Borough's nine district centres (see above) there are five local centres providing mainly smaller convenience stores and walk-to services for the locality in which they are situated. The secondary frontages of district centres and the designated frontages of local centres are appropriate locations for the full range of A Class uses, including take aways, and any other use which is primarily for visiting members of the public, such as laundrettes, taxi offices and amusement arcades. The Council will give consideration to community uses within secondary frontages where it can be demonstrated that these will be open to visiting members of the public and would support the vitality and viability of the centre (for example, by encouraging linked trips to other shops and services within the centre). However A strong presence of retail activity is important within <u>these secondary and designated</u> frontages. Designated frontages form the basis for safeguarding and consolidating the basic convenience retail function of local centres and, for this reason, non retail activities will be limited to 50% of the designated frontage of each centre. in the case of district centres, secondary frontages provide opportunities for retailers that may not be viable within the more expensive primary frontages but which nevertheless add to the overall retail capacity and attractiveness of the centre. In secondary frontages the proportion of non-retail activity within each district centre will therefore be limited to 50% of that frontage. To prevent the accumulation of a pipeline of non-retail uses that could exceed the 50% ceilings, the Council will take into account any relevant extant planning permissions. However, in certain cases these limits may be breached where the proposal would significantly help the vitality and viability of a centre,</i>

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			<p>particularly in cases where a unit has been vacant for a substantial amount of time, or the proposal can clearly demonstrate that it would attract a significant number of people to the centre who otherwise would not have visited. The National Planning Policy Framework (2012) defines secondary shopping frontages as those that provide greater opportunities for a diversity uses such as restaurants, cinemas and businesses^[Footnote a], and states that local planning authorities should set policies for uses within town centres based on a clear definition of these and other frontages^[Footnote b]. Harrow's Retail Study (2009) concluded that there is a continuing need to monitor uses within the shopping frontages of town centres and to protect Class A uses^[Footnote c]. The Study went on to suggest changes to frontages within a number of the Borough's town centres, which have been taken forward through the Harrow & Wealdstone Area Action Plan and the Site Allocations DPD. The Council considers that 50% is a reasonable balance of retail and non-retail uses within secondary and designated shopping frontages, having regard also to the vitality and viability of the town centre concerned or (if relevant) Policy DM50 Further Detail on the method for applying policies on the change of use of shops is provided at Schedule 2.</p> <p>^[Footnote a] See NPPF Annex 2: Glossary. ^[Footnote b] See NPPF paragraph 23. ^[Footnote c] See Harrow Retail Study (2009) paragraph 18.32.</p>
MM301	136	8.20	<i>Delete final sentence</i>
MM302	136	8.21	<i>Delete final two sentences</i>
MM303	136	8.22	<i>Amend first two sentences as follows; Take aways are now an established characteristic of most town centres and they offer a valued service to shoppers (when they are open during the day), residents and pub-goers. However take away uses can also result in increased litter, noise (particularly at night) and on-street parking requiring careful consideration of these issues when such uses are proposed. Delete final sentence.</i>
MM304	136	Following 8.22	<p><i>Insert new paragraph; Pursuant to the broader spatial strategy for the Borough, Policy CS1 L of the Core Strategy promotes town centres as the focus for community life. Community facilities^[Footnote] such as cultural premises, places of worship, nurseries, educational establishments and healthcare services may compliment the diversity of uses open to visiting members of the public within secondary and designated frontages. They can positively contribute to the vitality and viability of the town centres by increasing footfall and the range of visitors to the town centre.</i></p> <p>^[Footnote] See Harrow Core Strategy Appendix F: Glossary and NPPF paragraph 70.</p>
MM305	136	Following 8.22	<p><i>Insert box; Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • <u>NPPF Paragraph 23, 24, 26 and 27</u> • <u>London Plan Policy 2.15, 4.7 and 4.8</u> • <u>Core Strategy Policy CS1 L and M</u> • <u>Harrow's Retail Study (2009)</u> • <u>Harrow's Town Centre Shopping Frontage Surveys (produced annually)</u>

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MM306	136	DM49	<i>Amend section A as follows; Within <u>neighbourhood parades</u> and the non-designated parades of town centres and neighbourhood parades, as defined on the Harrow Policies Map, the use of ground floor premises for purposes that are appropriate town centre, community and economic uses will be permitted provided that: (then subsection a as existing, and subsection b amended as follows;) the use would not be detrimental to the amenity of neighbouring occupiers (<u>see Policy DM1</u>) or highway safety.</i>
MM307	136	DM49	<i>Add sections B and C; <u>Residential is not an appropriate use of ground floor premises in neighbourhood parades and non-designated frontages of town centres and will be resisted.</u></i> <i><u>Extensions of 400 square metres or less within neighbourhood parades and non-designated parades of town centres will be assessed without the need for sequential assessment.</u></i>
MM308	137	8.23	<i>Delete penultimate sentence and amend final sentence as follows; Such The provision of managed work spaces <u>can</u> help start-ups (including home working) and existing businesses to establish and grow by providing flexible office space and access to ancillary services such as meeting rooms, support and advice.</i>
MM309	137	8.24	<i>Delete paragraph 8.24</i>
MM310	137	8.25	<i>Delete final sentence</i>
MM311	137	8.26	<i>Delete final two sentences</i>
MM312	137	8.27	<i>Delete final sentence and amend first two sentences as follows; Take aways are now an established characteristic of most town centres and they offer a valued service to shoppers (<u>when they are open during the day</u>), residents and pub-goers. However take away uses can also result in increased litter, noise (particularly at night) and on-street parking <u>requiring careful consideration of these issues when such uses are proposed.</u></i>
MM313	138	Following 8.27	<i>Add two new paragraphs; <u>Although not formally a part of the Borough's town centre network, neighbourhood parades are an important component of the Metroland character of Harrow and provide premises for shopping and related local-scale facilities which residents can easily walk-to from their home. In applying the sequential assessment to proposals for retail development it is not intended to frustrate the functioning of neighbourhood parades or those non-designated parades within town centres which may be more than 300m from the primary shopping area (and therefore defined as 'edge of centre' for retail purposes).</u></i> <i><u>Residential use of ground floor shop premises sends the strongest possible signal that a town centre or neighbourhood parade is in decline and, given the permanence of residential use, indicates that any attempt to regenerate it has been abandoned. Ground floor premises within town centres and neighbourhood parades provide opportunities for a full range of</u></i>

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			<u>uses and activities that are not appropriate or are more difficult to accommodate within surrounding residential areas. By providing dedicated mixed-use environments and accessible locations for walk-to shops, services, other businesses and community facilities, town centres and neighbourhood parades also contribute to the principles of lifetime neighbourhoods (see Policy DM2).</u>
MM314	138	Following 8.27	<i>Add box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF Paragraph 24, 26 and 27</u> • <u>London Plan Policy 2.15, 4.7 and 4.8</u> • <u>Core Strategy Policy CS1 L and M</u> • <u>Harrow's Retail Study (2009)</u>
MM315	138	DM50	<i>Delete and Neighbourhood Parades from heading and sections A and D.</i> <i>Amend section A as follows; In town centres and neighbourhood parades with a vacancy rate exceeding 20% over a continuous period of two or more years, the use of ground floor premises that have been vacant and <u>appropriately marketed</u> for a period of one year will be permitted as follows: (continue with subsections a and b as existing; delete subsection c). Add to section C; (see Policy DM1)</i>
MM316	138	8.28	<i>Amend as follows; Vacant shop units in town centres and neighbourhood parades are detrimental to their vitality and viability. Short term vacancies are a part of normal market activity as shops change hands and are refurbished for new traders, whilst economic cycles will lead to variability in the demand for town centre premises in the medium term. However long term vacancies may be indicative of more significant, structural problems within a town centre or neighbourhood parade. Moreover, sustained high levels of vacancy within a centre can trigger a negative downward spiral as overall footfall levels reduce, the amount of inactive or 'dead' frontage increases, and perceptions spread that the town centre or neighbourhood parade is in decline.</i>
MM317	138	Paragraphs 8.29 and 8.30	<i>Delete paragraphs 8.29 and 8.30</i>
MM318	139	8.31	<i>Preface by adding; <u>The NPPF recognises that primary shopping areas and frontages are the areas where core retailing functions and uses will be located.</u> and delete final four sentences.</i>
MM319	139	8.32	<i>Delete first and final sentences</i>
MM320	139	8.33	<i>Delete paragraph 8.33</i>
MM321	139	8.34	<i>Delete final sentence and amend first two sentences as follows; Take aways are now an established characteristic of most town centres and they offer a valued service to shoppers <u>(when they are open during the day)</u>, residents and pub-goers. However take away uses can also result in increased litter, noise (particularly at night) and on-street parking <u>requiring careful consideration of these issues when such uses are proposed.</u></i>
MM322	139	8.35	<i>Amend as follows; Residential use of ground floor shop</i>

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			<p>premises sends the strongest possible signal that a town centre or neighbourhood parade is in decline and, <u>given the permanence of residential use</u>, that any attempt to regenerate it has been abandoned. Moreover, former shop units within town centres and neighbourhood parades rarely provide a satisfactory living environment and their residential use would be at odds with lifetime neighbourhood principles. For these reasons the residential use of ground floor premises in town centres and neighbourhood parades will not be permitted under any circumstances. Ground floor premises within town centres and neighbourhood parades provide opportunities for a full range of uses and activities that are not appropriate or are more difficult to accommodate within surrounding residential areas. By providing dedicated mixed-use environments and accessible locations for walk-to shops, services, other businesses and community facilities, town centres and neighbourhood parades also contribute to the principles of lifetime neighbourhoods (see Policy DM2).</p>
MM323	139	Following 8.35	<p><i>Insert box Key Policy and Guidance Links</i></p> <ul style="list-style-type: none"> • <u>NPPF Paragraph 24, 26 and 27</u> • <u>London Plan Policy 2.15, 4.7 and 4.8</u> • <u>Core Strategy Policy CS1 L and M</u> • <u>Harrow's Retail Study (2009)</u> • <u>Harrow's Town Centre Shopping Frontage Surveys (produced annually)</u>
MM324	140	8.36	<i>Delete final two sentences</i>
MM325	140	8.37	<i>Delete paragraph 8.37 and heading 1</i>
MM326	140	8.38	<i>Delete final sentence and heading 2</i>
MM327	140	8.39	<p><i>Amend as follows;</i> Alongside the Harrow & Wealdstone Intensification Area, the redevelopment of previously developed land within town centres is at the heart of Harrow's spatial strategy for the sustainable accommodation of the Borough's projected growth. <u>The redevelopment of town centre sites provides the opportunity for new development to include a mix of uses, including retail (if within or well related to designated frontages), business, leisure, tourism, community uses, health and residential development.</u> In most situations the single use of sites within town centres is unlikely to constitute an efficient and effective use of previously developed land. <u>However, in addition to considerations of context and compatible with other development in the town centre, the suitable or appropriate mix of uses to be provided on a site are likely to be informed to a large degree by the need to ensure the different uses proposed can coexist effectively and other policy requirements of the Development Plan, including requirements for active ground floor frontages, replacement office space or the achievement of locally specific sub area objectives set out in the Core Strategy.</u> The residential component of mixed use town centre developments should be consistent with the London Plan sustainable residential quality matrix unless, in combination with other components of the development, this would have adverse</p>

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			consequences upon local character and amenity.
MM328	141	8.40 – 8.44	<i>Delete paragraphs 8.40 to 8.44 and headings 3 to 5</i>
MM329	141	Following 8.44	<i>Insert box; <u>Key Policy and Guidance Links</u></i> <ul style="list-style-type: none"> • <u>NPPF Paragraph 24, 26 and 27</u> • <u>London Plan Policy 2.15, 4.7 and 4.8</u> • <u>Core Strategy Policy CS1 L and M</u>
MM330	141	DM52	<i>Amend subsection A b as follows; the impact upon the amenity of residential occupiers (<u>see Policy DM1</u>) within and adjoining the centre; and</i>
MM331	142	8.47	<i>Delete paragraph 8.47 and heading 1</i>
MM332	142	8.48	<i>Delete final two sentences</i>
MM333	142	8.49	<i>Delete first two sentences, first word of third sentence and heading 2</i>
MM334	142	8.51	<i>Delete final two sentences and heading 3</i>
MM335	143	8.52	<i>Delete final sentence</i>
MM336	143	8.53	<i>Delete paragraph 8.53</i>
MM337	143	Following 8.53	<i>Insert box; <u>Key Policy and Guidance Links</u></i> <ul style="list-style-type: none"> • <u>London Plan Policy 2.15 and 4.6</u> • <u>Core Strategy Policy CS1 L and M</u> • <u>Harrow's Licensing Policy (2010)</u>
MM338	145	DM53	<i>Amend subsection A b as follows; there would be appropriate provision for scooter and motorcycle parking <u>1 motorcycle/scooter parking space^[Footnote] per 20 car parking spaces subject to all developments with more than 10 car parking spaces having a minimum of 1 space; and</u> ^[Footnote] <u>of dimensions 2 metres x 0.8 metre.</u></i>
MM339	146	9.2	<i>Delete second sentence</i>
MM340	146	9.4	<i>Delete final two sentences and substitute; <u>On-site provision for vehicle parking overcomes issues with on-street parking especially in residential areas where the road carriageway width is restricted and where parking results in congestion and can result in a hindrance to traffic flow.</u></i>
MM341	146	9.6	<i>Delete paragraph 9.6 and substitute; <u>The Manual for Streets (DCLG/DfT, 2007) states that, in 2003, motorcycles accounted for 5% of all motor vehicles and estimates that the space required for a motor cycle to park is 2m x 0.8m. Provision of dedicated space for motorcycles, as well as other two-wheeled motorised vehicles, ensures that these road users are catered for and contributes to the efficient use of land by avoiding the need for motorcycle users to park in car parking bays (and therefore helping to minimise the landtake of parking areas overall).</u></i>
MM342	146	9.7	<i>Delete final three sentences and substitute; <u>This can be due to specific operational requirements, for example to ensure the safety and free flow of the surrounding highway network. Core Strategy Policy CS1 R undertakes to manage parking for new development to contribute to the delivery a modal shift away from private car use to more sustainable modes. However, and as recognised by the Outer London Commission^[Footnote a], the</u></i>

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			<p><u>interpretation of the London Plan standards may also be determined by other policy objectives for outer London</u>^[Footnote b]</p> <p>[Footnote a] <u>See paragraph 3.5 of the OLC Second Report, November 2012.</u></p> <p>[Footnote b] <u>See London Plan Policies 2.6, 2.7 and 2.8.</u></p>
MM343	147	9.8	<i>Delete final sentence and heading 1</i>
MM344	147	9.9	<i>Delete paragraph 9.9 and heading 2</i>
MM345	147	9.10	<i>Delete final two sentences and heading 3</i>
MM346	147	9.11	<i>Delete final two sentences</i>
MM347	148	9.12	<p><i>Preface by adding;</i> <u>The London Plan encourages car sharing and car clubs</u>^[Footnote] <u>and Harrow's Local Implementation Plan promotes their use as one of a number of interventions to help reduce carbon dioxide emissions, increase environmental sustainability and improve air quality (strategic objective 4).</u></p> <p>[Footnote] <u>See London Plan Policies 6.11 and 6.13. And delete final two sentences.</u></p>
MM348	148	9.13 – 9.15	<p><i>Delete paragraphs 9.13 to 9.15 and substitute;</i> <u>Parking areas that are overlooked and are well lit help to ensure that they are safe and secure. By contrast dark, isolated and poorly designed parking areas can negatively impact upon perceptions of safety and, as a consequence, lead to under-utilisation of dedicated parking space whilst adding to parking pressure elsewhere (such as on-street or by hardsurfacing of forecourts). Vehicle parking bays of appropriate dimensions and with sufficient manoeuvring space and visibility for the motorist benefit both driver and pedestrian safety. Cycle, scooter and motorcycle parking is an important mode of transport for some people but these vehicles are frequently susceptible to theft and Harrow's spatial strategy directs the Borough's development needs to be met on previously-developed land and most previously-developed sites already have at least one point of access onto the public highway network. Historic accesses can fall below modern standards (for example in terms of visibility or pedestrian priority) or otherwise be unsuited to more intensive vehicle movements and may be rectified through redesign or revised siting. tampering. Harrow's spatial strategy directs the Borough's development needs to be met on previously-developed land and most previously-developed sites already have at least one point of access onto the public highway network. Historic accesses can fall below modern standards (for example in terms of visibility or pedestrian priority) or otherwise be unsuited to more intensive vehicle movements and may be rectified through redesign or revised siting.</u></p>
MM349	148	Following 9.15	<p><i>Insert box;</i> <u>Key Policy and Guidance Links</u></p> <ul style="list-style-type: none"> • <u>NPPF Paragraph 35, 39, 40</u> • <u>London Plan Policy 6.9 and 6.13</u> • <u>London Plan Table 6.2 and 6.3</u> • <u>Core Strategy Policy CS1 R</u> • <u>Harrow's Accessible Homes SPD</u> • <u>Harrow's Residential Design Guide SPD</u>

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MM350	148	DM54	<p><i>Amend sections A and B as follows;</i></p> <p>Proposals for major development will be required to submit a Transport Assessment <u>for objective review by the Council. The Transport Assessment should to quantify the impacts of the proposal upon public transport, the highway network, the cycle network and upon conditions for pedestrians (See Policies DM1 B f and DM2).</u> Where multiple major developments are proposed in the area, the Council will encourage developers to co-operate to assess the cumulative impacts of the proposals upon transport.</p> <p>Proposals for major development will be required to satisfactorily mitigate the impacts identified in the Transport Assessment <u>and any others arising from the Council's assessment of it.</u> Mitigation measures will be required to contribute to the desirability of achieving modal shift away from private car use and should include the preparation and implementation of Travel Plans.</p> <p><u>Add section D; Where necessary, construction logistic plans and delivery and servicing plans should be submitted with an application.</u></p>
MM351	149	9.16	<i>Delete final sentence (submitted as a minor modification)</i>
MM352	149	9.17	<i>Amend first sentence and add new second sentence as follows;</i> Transport assessments provide a foundation for the quantification of quantitative and qualitative impacts of development upon <u>the existing transport network and on the environment. They are also important in showing how the likely transport impacts of a proposal will be managed and mitigated. (Then continue as existing)</u>
MM353	149	9.18 and 9.19	<i>Delete paragraphs 9.18 and 9.19 and substitute; <u>The requirement for Travel Plans seeks to ensure that once a development is occupied and operational, the management measures identified through the transport assessment are implemented and their effectiveness monitored. Travel Plans also play an important role in bringing forward initiatives that contribute to the achievement of a modal shift away from car use.</u></i>
MM354	149	Following 9.19	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF Paragraph 32, 34, 35, 36 and 37</u> • <u>London Plan Policy 6.3, 6.13, 6.14 , 7.14</u> • <u>Transport for London guidance on workplace and/or residential travel plan</u> • <u>Transport for London Transport Assessment Best Practice Guidance</u> • <u>Transport for London Construction Logistics Plan guidance for Developers</u> • <u>Core Strategy Policy CS1 R</u> • <u>Harrow's Transport Study (2010)</u>
MM355	150	DM55	<i>Amend subsection A b as follows; the availability of <u>existing service roads; and</u></i>

Ref	Page	Policy/ Paragraph	Main Modification
MM356	150	9.20	<i>Insert following third sentence; <u>Where existing service arrangements are inadequate and create road safety concerns, this may mean such issues may need to be made good to enable the development to proceed.</u></i>
MM357	150	9.21 – 9.28	<i>Delete headings 1, 2 and 3, paragraphs 9.21 to 9.25 and 9.27 and 9.28 and amend paragraph 9.26 as follows; Site access and servicing arrangements during construction can have significant highway and amenity implications in their own right <u>which can be avoided as part of the consideration of design and layout issues at an early stage of a development proposal.</u> For major development proposals, including those for residential use, the Council will seek to ensure that the temporary access and servicing arrangements cause minimum disruption on classified roads and are safe. Developers should also comply with the Considerate Contractor Code of Practice to avoid nuisance to neighbouring occupiers during the works.</i>
MM358	151	Following 9.28	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF Paragraph 123</u> • <u>London Plan Policy 6.3, 6.11, 6.13</u> • <u>Considerate Contractor Code of Practice</u>
MM359	151	DM56	<i>Delete section B including subsections a and b</i>
MM360	152	9.30 and 9.31	<i>Delete paragraphs 9.30 and 9.31</i>
MM361	152	9.32	<i>Delete three final sentences and substitute; <u>Good design and layout of development, in accordance with Policy DM1 and DM30, can ensure waste and recycling facilities are integrated, functional and do not give rise to visual and amenity impacts.</u></i>
MM362	152	9.33	<i>Delete paragraph 9.33</i>
MM363	152	Following 9.33	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>Core Strategy Policy CS1 X</u> • <u>Council's Code of Practice for the Storage and Collection of Refuse and Materials for Recycling in Domestic Properties (2008)</u>
MM364	154	10.3	<i>Delete paragraph 10.3</i>
MM365	154	DM57	<i>Amend subsection B c as follows; There would be no adverse impact on residential amenity (see Policy DM1) or highway safety.</i>
MM366	154	DM57	<i>Amend section D as follows; Proposals for the conversion of <u>offices employment floorspace</u> to community and educational uses will be considered having regard to:</i> <p style="margin-left: 40px;"><i>a the principle of the loss of <u>office employment floorspace</u> in accordance with Policy <u>DM40 & DM41</u>;</i></p> <p style="margin-left: 40px;"><i>(then continue with b and c as existing)</i></p>
MM367	155	10.4	<i>Amend final sentence as follows; The Council will support proposals for the refurbishment and, in the case of under-used or alternatively used facilities^[Footnote], <u>the re-use of community or educational premises, can help</u> to meet modern expectations of the quality of provision and residents' needs for such facilities.</i>

Ref	Page	Policy/ Paragraph	Main Modification
			[Footnote] Such as park pavilions converted to commercial use.
MM368	155	10.5	<i>Delete paragraphs 10.5 and heading 1</i>
MM369	155	10.6	<i>Delete final two sentences and heading 2. Amend first sentence as follows; Facilities that are located in close proximity to the community they serve, and have good public transport accessibility, achieve a number of benefits.</i>
MM370	155	10.7 and 10.8	<i>Delete paragraphs 10.7 and 10.8 and heading 3.</i>
MM371	156	10.9	<i>Amend as follows; Public halls, sports halls and school facilities (such as playing fields, performing arts facilities and indoor sports facilities) that are unused for substantial periods of time represent an inefficient use of land and buildings and, in the long term, risk becoming unviable. <u>Appropriate community access to major new halls and educational development will ensure</u> To secure efficient use of land and assets, and <u>can</u> where possible to help address deficiencies identified in Harrow's Open Space, Sport and Recreation Study (2011). the Council will seek appropriate community access to major new halls and educational development.</i>
MM372	156	10.10	<i>Amend as follows, including deletion of heading 1; <u>Harrow's Local Economic Assessment (2011/12) points to potential employment growth in a number of community orientated sectors including education, health, arts, entertainment and recreation</u> [Footnote]. <u>The Council recognises the need to manage the release of unsuitable, traditional employment floorspace and to encourage diversification of economic and related uses.</u> Subject to economic development and town centre policies (see Chapters 7 & 8 and the London Plan) some community facilities may usefully occupy <u>such sites or vacant office or shop premises in town centres.</u> In so doing they may enhance town centre vitality and viability <u>and help to deliver economic diversification and growth.</u> Proposals will be considered having regard to: [Footnote] <u>See paragraph 3.14 of the Assessment.</u></i>
MM373	156	10.11 – 10.16	<i>Delete paragraphs 10.11 to 10.13 and 10.15 and 10.16, including headings 2 and 3. Delete second, third, fourth and fifth sentences of paragraph 10.14 and amend first sentence as follows; Community and educational uses may generate parking and access requirements that are different in character to those of office employment floorspace occupiers, and may therefore need to demonstrate how the requirements in Policy <u>DM53 Parking Standards</u> are to be satisfied.</i>
MM374	156	Following 10.16	<i>Insert box; <u>Key Policy and Guidance Links</u></i> <ul style="list-style-type: none"> • <u>NPPF paragraph 70, 72, 73 and 74</u> • <u>London Plan Policy 3.17, 3.18, 3.19</u> • <u>Core Strategy Policy CS1 G and Z</u> • <u>Harrow's PPG 17 Study (2010)</u> • <u>Harrow's Access for All SPD</u>
MM375	157	DM58	<i>Amend section A as follows; A Proposals involving the loss of an existing community, sport or educational facility will be resisted unless permitted if; a there is no longer a need for that facility, <u>(having regard to</u></i>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>the amount of local patronage, the quality of facilities offered and the duration and extent of marketing. (For proposals involving the los of a public house, evidence of 12 months suitable marketing activity will be required or evidence that the public house is no longer financially viable through the submission of trading accounts, or other similar financial evidence, whilst the pub was operating as a full time business))</u> or</p> <p>b <u>there are adequate similar facilities nearby within walking distance which offer equivalent provision, or</u></p> <p>c <u>the activities carried on are inconsistent and cannot be made consistent with acceptable living conditions for nearby residents, or</u></p> <p>d <u>the redevelopment of the site would secure an overriding public benefit.</u></p>
MM376	157	10.17	<p><i>Delete third to sixth sentences and amend second sentence as follows; <u>Harrow's The Council values existing community, sports and education facilities contribute to sustainable communities by providing venues for a wide range of activities and services, all of which add to the borough's diversity and interest. As such, they make a significant contribution to people's mental and physical wellbeing, sense of place and community, learning and education. The Council therefore places great emphasis on the retention of existing facilities, particularly where they provide an important and accessible service to local residents and do not cause unacceptable disturbance. and will therefore resist their unjustified loss to other uses.</u></i></p>
MM377	157	10.18	<p><i>Delete paragraph 10.18 and substitute; <u>Many of Harrow's Public Houses are closely associated with the life and identity of local communities, playing a valuable role in providing informal community meeting places, and often offer a wider range of community functions. Pubs are also an integral part of the fabric of metroland Harrow, and form an important part of many streetscapes and shopping parades. Nationally, the number of Public Houses peaked in the late 19th century and has since fallen. In recent years Harrow has witnessed a steady decline in their provision, particularly through conversion to residential use in areas outside Town Centres. Consistent with the NPPF, the Council considers that public houses are community facilities and the Plan should guard against their unnecessary loss in accordance with Core Strategy CS1 Z unless alternative facilities are provided or it can be demonstrated that there is a general lack of demand for the Public House or that it is no longer financially viable. Continuing changes in society such as reduced tolerance of drinking and driving, increased home entertainment and adherence to religions promoting abstinence must also be recognised. Recent changes in legislation such as the requirement for outdoor smoking areas and recent changes in technology such as powerful sound systems have made the continued use of some premises incompatible with residential amenity.</u></i></p>

Ref	Page	Policy/ Paragraph	Main Modification
MM378	157	Following 10.18	<i>Insert box; <u>Key Policy and Guidance Links</u></i> <ul style="list-style-type: none"> • <u>NPPF Paragraph 70, 72, 73 and 74</u> • <u>London Plan Policy 3.1, 3.17, 3.18, 3.19</u> • <u>Core Strategy Policy CS1 G and Z</u> • <u>Harrow's PPG 17 Study (2010)</u>
MM379	158	DM59	<i>Amend as follows;</i> A. Proposals that would increase the capacity and quality of outdoor sport facilities, ancillary activities that support sporting activities, and those that would secure community access to private facilities, will be supported provided that: <ol style="list-style-type: none"> a. there would be no conflict with Green Belt, Metropolitan Open Land and open space policies (<u>see NPPF paragraphs 87-89, London Plan Policies 7.16 and 7.17, and Policy DM25</u>); b. the proposal would not be detrimental to any heritage or biodiversity assets within or surrounding the site (<u>see Policies DM7, DM27 & DM28</u>); and c. there would be no adverse impact on residential amenity (<u>see Policy DM1</u>) or highway safety. B. <u>Proposals for uses that would support outdoor sporting uses will be supported where they are:</u> <ol style="list-style-type: none"> a. <u>ancillary in terms of size, frequency, use and capacity; and</u> b. <u>do not displace or prejudice facilities needed for the proper functioning of the principal outdoor sports uses.</u> C. Proposals for floodlighting will be supported where it would enhance sport facilities and would not be detrimental to the character of the open land, the amenity of neighbouring occupiers nor harmful to biodiversity.
MM380	158	10.19	<i>Delete third, fifth and sixth sentences and add; However uses that displace changing accommodation, equipment stores and other necessary built space or that introduces incompatible activities can pose a risk to the proper functioning of the outdoor sport space and create pressure for additional built facilities on open space,</i>
MM381	158	10.20	<i>Delete paragraph 10.20</i>
MM382	159	10.21	<i>Amend as follows; Many of Harrow's open spaces are enveloped by residential property. Open space provides an attractive outlook for neighbouring occupiers, whilst surrounding residential property helps to provide natural surveillance of open space and associated premises. However, the intensification of use and the introduction of buildings and facilities can Enhancements that help to secure a viable future for sport and other recreational activities, and therefore help to secure the retention of open space, will be supported wherever possible. However applicants should be sensitive to the context and setting of the site; proposed facilities and the resulting intensification that would be severely detrimental to the amenity of neighbouring residents or and may impact upon highway safety will be resisted.</i>
MM383	159	10.22	<i>Delete three final sentences and substitute; Floodlighting can play an important role in helping to increase the usability of outdoor sporting venues, and so increase their viability. Associated increases in the carrying capacity of sports facilities can also help to reduce identified deficiencies in access to</i>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>sports facilities as shown in Harrow's PPG17, Open Space, Sports and Recreation Study. With sensitive location and careful design, the impact that floodlights can have upon amenity and biodiversity may be mitigated.</u>
MM384	159	10.23	<i>Delete paragraph 10.23</i>
MM385	159	Following 10.23	<i>Insert box; Key Policy and Guidance Links</i> <ul style="list-style-type: none"> • <u>NPPF Paragraph 70, 73, 74, 81, 89</u> • <u>London Plan Policy 3.1, 3.19</u> • <u>Core Strategy Policy CS1 G and Z</u> • <u>Harrow's PPG 17 Study (2010)</u>
MM386	161	11.3	<i>Delete final sentence</i>
MM387	161	DM60	<i>Amend as follows;</i> A. Proposals for the installation of telecommunications equipment will be supported where it can be demonstrated that: <i>(continue with a. and b as existing);</i> c. there would be no unacceptable impact upon areas of designated open space, heritage, landscape and biodiversity value; <u>and</u> <i>(delete d, redesignate e as d and continue as existing)</i> <u>B. Where installation of telecommunications infrastructure is required to support the effective functioning of the emergency services, the Council recognises that compliance with the above criteria may not be feasible.</u> <u>C. Proposals for major development should make provision for communal satellite and digital television receiving equipment.</u> <u>D. Proposals that would prejudice any component of this policy will be refused.</u>
MM388	162	11.4	<i>Delete three final sentences</i>
MM389	162	11.5 and 11.6	<i>Delete paragraphs 11.5 and 11.6 and heading 1</i>
MM390	162	11.7	<i>Amend as follows; Consistent with the National Planning Policy Framework, the search for suitable sites for telecommunications installations should start with existing masts, buildings or other suitable structures. There are already a number of telecommunications installations throughout the Borough that can be used to accommodate additional equipment. Telecommunications equipment on schools and other premises used primarily by children can cause anxiety within the community. On streets and within public spaces, a proliferation of cabinets can lead to cluttering and run counter to initiatives to declutter such environments. Whilst other areas, such as Green Belt, Metropolitan Open Land and Conservation Areas are likely to be sensitive to the installation of new masts and structures. The aim of the policy therefore is to ensure that the proliferation of new telecommunications structures is kept to a minimum, their visual impact is appropriately mitigated, and to provide opportunities for the rationalisation or screening of equipment already installed on existing masts, and buildings and street cabinets. Exceptionally, where an existing mast or building is so heavily equipped with existing telecommunications infrastructure that</i>

Ref	Page	Policy/ Paragraph	Main Modification
			further installations would be visually harmful, and there are no other existing alternative sites, a new site will be sought.
MM391	162	Following 11.7	<u>Insert new paragraph; However, where new telecommunications provision is crucial to the operations of the emergency services, such provision should be enabled without undue impediment in the interests of the safety of Harrow residents.</u>
MM392	162	11.8 – 11.14	<u>Delete paragraphs 11.8 to 11.14 including headings</u>
MM393	163	Following 11.14	<u>Insert box; Key Policy and Guidance Links</u> <ul style="list-style-type: none"> • <u>NPPF Paragraph 43 - 46</u> • <u>London Plan Policy 4.11</u> • <u>Core Strategy Policy CS1 Z</u> • <u>Code of Best Practice on Mobile Phone Development (2002)</u> • <u>International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines</u>
MM394	165	12.1 and 12.2	<u>Delete paragraphs 12.1 and 12.2 and substitute; While new development can make provision for new homes, employment and leisure facilities, and can improve our environment through use of renewable energy and improved landscaping, it can also place additional pressure on social and physical infrastructure and general amenity, and may require measures to be taken to remedy or mitigate such impacts.</u>
MM395	165	DM61	<u>Delete section A (including subsections) and substitute; Planning obligations will be sought on a scheme-by-scheme basis to secure the provision of affordable housing in relation to residential development schemes, and to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.</u>
MM396	165	12.3 to 12.10	<u>Delete paragraphs 12.3 to 12.10 and substitute;</u> <u>While the introduction a Harrow's Community Infrastructure Levy will ensure that new development helps to fund the cost of new or enhanced strategic infrastructure The list of the types of infrastructure to be funded by CIL is set out in the Regulation 123 list available on the Council's website, such as schools, libraries and healthcare, the use of planning obligations can ensure that any site specific impacts are appropriately mitigated, thereby ensuring the new development is sustainable.</u> <u>While the Council expects most impacts of development to be mitigated through good design and layout, in accordance with Policy DM1, some impacts are likely to require physical works or other forms of improvement to mitigate them. However, the nature of site specific impacts means they vary widely depending on the site, its local context, and the development proposed. Therefore, beyond the requirements for affordable housing, it is not possible to ascribe a set of circumstances under which certain types of obligations will be sought as a norm. To assist developers and others to understand what types of obligations may be sought, and how these may be best met, the Council is preparing a Planning Obligations SPD.</u>

Ref	Page	Policy/ Paragraph	Main Modification
MM397	166	Following 12.10	<i>Insert box; <u>Key Policy and Guidance Links</u></i> <ul style="list-style-type: none"> • <u>Community Infrastructure Levy Regulations (2010) (amended)</u> • <u>NPPF paragraphs 173, 203 -206</u> • <u>Community Infrastructure Levy: An overview, DCLG (2011)</u> • <u>CIL Guidance: Charge setting and charging schedule procedures, DCLG (December 2010)</u> • <u>London Plan Policies 3.12, 4.9, 6.1, 7.14 and 8.2</u> • <u>DMP DPD Policies DM7, DM32 and DM37</u>
MM398	167	DM62, 12.11 and 12.12	<i>Delete policy DM62 and paragraphs 12.11 and 12.12.</i>
MM399	161-167	Chapters 11 and 12	<i>Delete as separate chapters. Merge remaining content with chapter 10.</i>
MM400	169	Glossary	<i>Include definitions of;</i> <u>Bulk: The size and volume of a building</u> <u>Community Facilities: Community facilities include educational facilities, youth centres, advice centres and community halls These include leisure and culture facilities (including arts, entertainment and sport facilities), licenced public houses, community offices and meeting places (including places of worship, libraries), facilities for children (from nursery provision to youth clubs), education (including adult education), social services, police and emergency services facilities, primary healthcare facilities (except for the use of premises attached to the residence of the consultant or practitioner), public toilets and facilities for cyclists.</u> <u>Massing: The three dimensional form of a building</u>
MM401	191	Schedule 3	<i>Delete Schedule 3</i>
MM402	202	Schedule 4, paragraph 4.1	<i>Add; <u>The methodology for assessing the impact of proposals upon a landmark viewing corridor and wider setting consultation area is set out in the Mayor of London's <i>London View Management Framework: Supplementary Planning Guidance</i> (2012). Paragraph 18 of the SPG requires a planning application for a proposal affecting a view to be accompanied by an analysis that explains, evaluates and justifies any visual impact on the view. For the avoidance of doubt, this SPG will apply to Harrow's Protected Views as it does to a Designated View in the London Plan. For each relevant assessment point the analysis must include an accurate topographical survey and specify the height of the camera relative to the ground.</u></i>
MM403	226	Schedule 5	<i>Delete Schedule 5</i>
MM404	253	Appendix C	<i>Delete Appendix C</i>
MM405		Policies Map	<i>Add to key; <u>Users of the printed Policies Map should note that, for clarity, flood zones, critical drainage areas and the Harrow Green Grid have been omitted. These designations (which may be updated from time to time) can be viewed as additional layers on the online version of the Policies Map: http://harrow.addresscafe.com/app/exploreit/. A PDF version of the Policies Map showing these layers is also available on request.</u></i>

Ref	Page	Policy/ Paragraph	Main Modification
MM406 to 500			<i>These modification numbers are not used.</i>

Appendix B– SALP Main Modifications

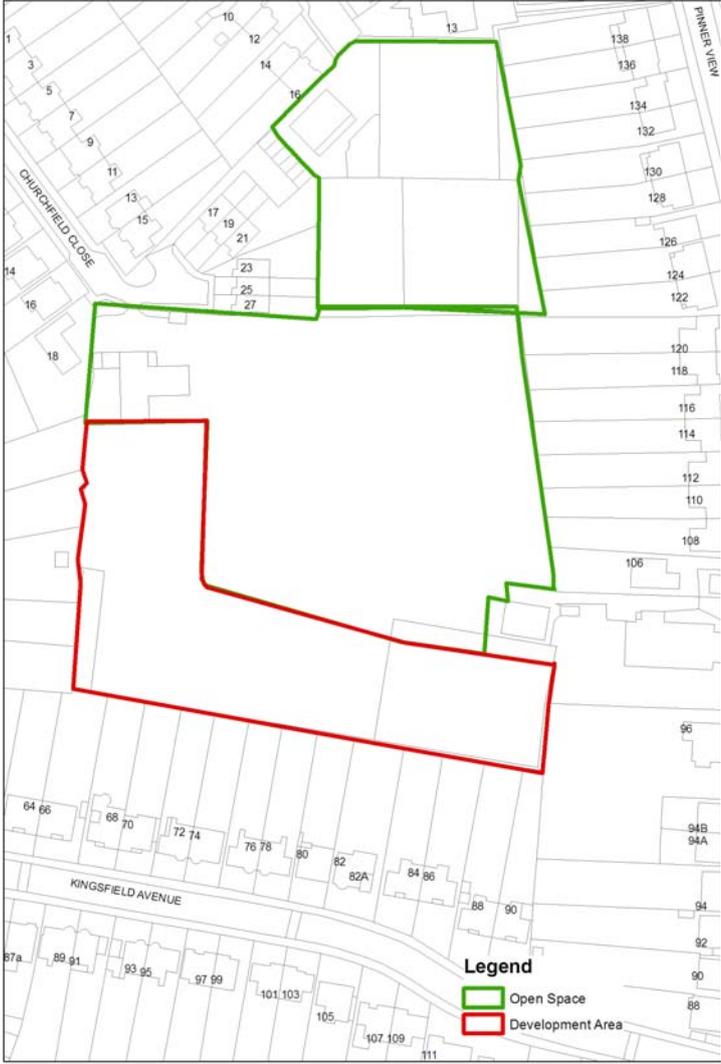
The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, including the minor modifications submitted at the time, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM501	3	1.1	<i>Add; <u>except for retail development, for which provision is made to meet retail development needs to 2020 and for which a review will be undertaken in 2014/2015.</u></i>
MM502	3	1.2	<i>Delete final sentence and substitute; <u>The chapters of this DPD are arranged thematically and, within each chapter, site allocations are arranged by Core Strategy sub area.</u></i>
MM503	7	1.19	<i>Add; <u>Within each chapter, site allocations are arranged by Core Strategy sub area (see paragraph 1.2).</u></i>
MM503A	10	2.5	<i>In second sentence, amend six to read <u>four</u>.</i>
MM504	11	R1	<i>Delete site allocation</i>
MM505	23	R6	<i>Delete site allocation</i>
MM506	27	Summary of retail-led Development Site capacity	<i>Delete sites R1 and R6 (site R4 already deleted in submitted document) and amend totals as follows; Potential retail capacity 6500<u>4500</u>m², potential housing capacity 472<u>154</u></i>
MM507	57	EM3	<i>Delete site allocation</i>
MM508	59	EM4	<i>Delete site allocation</i>
MM509	61	EM5	<i>Delete site allocation</i>
MM510	63	Summary of employment-led development site capacity	<i>Delete sites EM3, EM4 and EM5 and amend totals as follows; Indicative Employment Floorspace 18184 <u>14760</u> m², Potential Housing capacity 493 <u>300</u>.</i>
MM510A	74	4.1	<i>Amend third and subsequent sentences as follows; This chapter identifies sufficient, previously-developed sites to provide a net increase of 586 <u>543</u> homes. Other chapters in this development plan document identify sufficient, previously-developed sites to provide a net increase of 1,011 <u>686</u> homes¹¹. A net addition of 792 homes has</i>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>already been delivered during the two years of 2009/10 and 2010/11 and a further net contribution of 401 <u>433</u> homes has been made in the year 2011/12¹². Together with a pipeline supply of sites with planning permission sufficient to provide a net increase of 879 <u>985</u>¹³, identified capacity outside of the Intensification Area totals 3,669 <u>3439</u> net new homes. A detailed housing schedule is provided at Appendix A.</p> <p>^[Footnote 11] Comprising 472 <u>154</u> homes as part of retail-led development sites; 493 <u>300</u> homes as part of employment-led development sites 239 <u>127</u> homes on strategic, previously-developed sites within the Green Belt and 407 <u>105</u> homes on sites included in the "other" chapter.</p> <p><i>Delete footnotes 12 and 13</i></p>
MM511	77	4.6	<i>Delete paragraph 4.6 and heading Commentary.</i>
MM512	80	H3	<i>Delete site allocation</i>
MM513	81	4.10	<i>Delete paragraph 4.10 and heading Commentary</i>
MM514	83	4.11	<p><i>Amend paragraph 4.11 to read as follows:</i></p> <p>A planning application for the redevelopment of the site consisting of A3/B1 uses at ground floor level and 11 flats above, together with two flats fronting Brooke Avenue, was refused in <u>on 13th</u> January 2005 (P/2462/04) for reasons of design, character, amenity and overdevelopment. <u>A further application for redevelopment to provide a drinking establishment and 9 flats was refused 29th July 2005 (P/1353/05).</u></p>
MM515	83	4.12	<i>Add; <u>In view of the disused and derelict condition of this site, if it is not made available to the market the Council will consider using its compulsory purchase powers to bring about redevelopment.</u></i>
MM516	85	4.14	<i>Delete paragraph 4.14 and heading Commentary</i>
MM517	87	4.16	<i>Delete paragraph 4.16 and heading Commentary</i>
MM518	88	H7	<i>Delete site allocation</i>
MM519	90	H8	<p><i>Amend site details;</i></p> <p>Number of Homes (gross): 20 <u>28</u></p> <p>Number of Homes (net): 19 <u>27</u></p> <p>Other Uses Proposed: Public House or other appropriate town centre/community uses (see below <u>– 448m² mixed-use floorspace or 801m² retail floorspace</u>)</p>
MM520	93	4.24	<i>Delete reference to chapter 8. Substitute reference to chapter <u>1</u></i>
MM521	95	H10	<i>Delete site allocation</i>
MM522	104	4.37	<i>Delete first sentence</i>
MM523	116	4.53	<i>Delete paragraph 4.53 and heading Commentary</i>

Ref	Page	Policy/ Paragraph	Main Modification
MM524	118	4.54	<i>Add; A revised application was refused by the Council on 21st September 2012 (P/2478/12).</i>
MM525	124	4.62	<i>Delete paragraph 4.62 and heading Commentary</i>
MM526	126	4.63	<i>Add; (P/1468/06)</i>
MM527	126	4.64	<i>Add; In view of the vacant condition of this site, if it is not made available to the market the Council will consider using its compulsory purchase powers to bring about redevelopment.</i>
MM528	127	Summary of Housing Development Site Capacity	<i>(Site H2 already deleted in submitted document) Delete sites, H3, H7, H10, H22. Amend site H8 housing capacity as follows; gross 20 28, net 19 27. Amend totals as follows; gross 596 553 net 586 543.</i>
MM529	130	GB1	<i>Delete site allocation</i>
MM530	135	5.5	<i>Following first sentence amend as follows; The outline planning permission was renewed in March 2012 and the PFI scheme for the redevelopment of the hospital is set to proceed on 4th June 2010 (P/0083/10). On 19th December 2012 the Council received a further planning application for a new hospital and up to 347 dwellings (including 36 units of staff accommodation) together with 19.2 hectares of public and private open space, 1,398 car parking spaces and revisions to the access and service road (P/3191/12).</i>
MM531	139	GB4	<i>Delete site allocation</i>
MM532	141	Summary of Strategic Previously-developed Sites in the Green Belt	<i>Delete sites GB1 and GB4 and amend totals as follows; Housing Capacity gross 240 127 net 239 127</i>
MM533	239	G03	<i>Amend site diagram as follows;</i>

Ref	Page	Policy/ Paragraph	Main Modification
			 <p>The map displays a residential area with property boundaries. A green outline highlights a large area designated as 'Open Space', which includes several plots and a central open area. A red outline highlights a 'Development Area' located to the south and west of the open space. The map shows streets including Churchfield Close, Kingsfield Avenue, and Pinner View, with house numbers ranging from 1 to 138.</p>
MM534	240	8.8	<i>Add; (P/2336/11)</i>
MM535	245	G06	<i>Amend Site Details as follows; Number of Homes: 34 <u>32 (gross)</u> 32 <u>30 (net)</u> Amend Planning designations as follows; Public transport Accessibility Level 4 <u>2</u></i>
MM536	246	8.15	<i>Add; On 6th December 2012 the Council received a planning application for alterations to the listed farmhouse to form two dwellings, alterations to and the conversion of the listed outbuildings for form three dwellings, the development of 27 houses and the formation of new public open space (P/3075/12).</i>
MM537	250	A.2	<i>Delete final sentence and amend Delivery Summary 2009/10 to 2025/26 as annexed to this appendix;</i>
MM537A	251	A.4	<i>Add two additional rows; Harrow and Wealdstone Intensification Area; 114 (gross),</i>

Ref	Page	Policy/ Paragraph	Main Modification																																							
			102 (net); Grand total: 1,125 (gross, 894 (net))																																							
MM538	251	A.5	<p><i>Amend as follows;</i></p> <p>Completions 2011/12</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Gross</th> <th>Net</th> </tr> </thead> <tbody> <tr> <td>Harrow on the Hill & Sudbury Hill</td> <td>24</td> <td>22</td> </tr> <tr> <td>South Harrow</td> <td>210</td> <td>21</td> </tr> <tr> <td>Rayners Lane & North Harrow</td> <td>50</td> <td>42</td> </tr> <tr> <td>Pinner & Hatch End</td> <td>27</td> <td>23</td> </tr> <tr> <td>Stanmore & Harrow Weald</td> <td>78</td> <td>56</td> </tr> <tr> <td>Edgware & Burnt Oak</td> <td>235</td> <td>230</td> </tr> <tr> <td>Kingsbury & Queensbury</td> <td>16</td> <td>10</td> </tr> <tr> <td>Kenton & Belmont</td> <td>5</td> <td>4</td> </tr> <tr> <td>Harrow & Wealdstone (remaining area)</td> <td>36</td> <td>25</td> </tr> <tr> <td>Total</td> <td>681</td> <td>433</td> </tr> <tr> <td>HWIA</td> <td>14</td> <td>12</td> </tr> <tr> <td>Grand Total</td> <td>695</td> <td>445</td> </tr> </tbody> </table>	Area	Gross	Net	Harrow on the Hill & Sudbury Hill	24	22	South Harrow	210	21	Rayners Lane & North Harrow	50	42	Pinner & Hatch End	27	23	Stanmore & Harrow Weald	78	56	Edgware & Burnt Oak	235	230	Kingsbury & Queensbury	16	10	Kenton & Belmont	5	4	Harrow & Wealdstone (remaining area)	36	25	Total	681	433	HWIA	14	12	Grand Total	695	445
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MM539	252	A.6	<p><i>Amend paragraphs A.6 and A.7 as follows;</i></p> <p>A6. The pipeline supply comprises new homes which have already been granted planning permission and are underway, but have not yet been completed. To avoid double-counting this source has been adjusted to exclude sites which would otherwise form a part of pipeline supply but that have nevertheless <u>have planning permission and have</u> been allocated in this DPD. Large sites are those with a capacity to deliver 10 or more homes. Planning application <u>permission</u> reference numbers are shown in brackets.</p> <p>A7. The following table shows the pipeline supply of homes from large sites taken from surveys that will inform the housing trajectory published <u>published</u> in Harrow's Annual Monitoring Report for the period 2011/12 (provisional data). Some large sites are subject to phasing and any homes delivered during the period 2009/10 - 2010/11, and during 2011/12 (provisional data), are included under 'Completions' above.</p> <p>Outstanding Housing Capacity of Large Sites Under Construction (2011/12 data provisional)</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Site</th> <th>Gross</th> <th>Net</th> </tr> </thead> <tbody> <tr> <td>South Harrow</td> <td>332 Northolt Road, South Harrow (P/2400/11)</td> <td>50</td> <td>50</td> </tr> <tr> <td></td> <td>Rayners Lane Estate (Phases G2, H1 & H2)</td> <td>95</td> <td>-9</td> </tr> <tr> <td></td> <td>Rayners Lane Estate (Phase F)</td> <td>27</td> <td>11</td> </tr> <tr> <td></td> <td>Sub Area Total</td> <td>172</td> <td>52</td> </tr> </tbody> </table>	Area	Site	Gross	Net	South Harrow	332 Northolt Road, South Harrow (P/2400/11)	50	50		Rayners Lane Estate (Phases G2, H1 & H2)	95	-9		Rayners Lane Estate (Phase F)	27	11		Sub Area Total	172	52																			
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	Rayners Lane Estate (Phase F)	27	11																																							
	Sub Area Total	172	52																																							

Ref	Page	Policy/ Paragraph	Main Modification			
			Rayners Lane & North Harrow	Strongbridge Close, Rayners Lane (P/3171/06)	127	37
				Former Vaughan Centre, Wilson Gardens, West Harrow (P1733/09)	13	13
				27-30 Pinner Park Gardens, Harrow (P/2279/10)	13	9
				90-100 Pinner Road, Harrow (P/4111/07)	12	12
				Sub Area Total	165	71
			Pinner & Hatch End	Mill Farm Close, Pinner Green (P/2415/09)	152	42
				Sub Area Total	152	42
			Stanmore & Harrow Weald	Boxtree Public House, Harrow Weald (P/2969/10)	14	14
				RAF Bentley Priory, The Common, Stanmore (P/1452/08)	112	112
				RAF Bentley Priory, The Common, Stanmore (P/1726/11)	4	4
				RAF Bentley Priory, The Common, Stanmore (P/3202/11)	1	-1
				Douglas Close, Stanmore (P/1794/10)	31	21
				Sub Area Total	162	150
			Edgware & Burnt Oak	9-17 High Street, Edgware (P/3418/11)	31	31
				415 Burnt Oak Broadway, Burnt Oak (P/2238/08)	14	14
				Former Government Offices, Honeypot Lane, Stanmore (P/2450/11)	213	213
				287-293 Whitchurch Lane, Canons Park (P/3309/06)	14	10
				Former Government Offices, Honeypot Lane, Stanmore (P/2317/06)	154	154
					426	422
			Harrow & Wealdstone (remaining area)	194-196 High Road, Wealdstone	13	10
				Sub Area Total	13	10

Ref	Page	Policy/ Paragraph	Main Modification																																				
				Total	1090	747																																	
				HWIA	269	267																																	
				Grand Total	1359	1014																																	
MM540	252	A.9	<p><i>Amend as follows;</i></p> <p>A9. The number of lapsed (unimplemented) residential planning permissions is recorded in Harrow's Annual Monitoring Report. Historically, the number of lapses is very low - the average for the period 2001/02 <u>2002/03</u> to 2010/11 <u>2011/12</u> is 17 <u>19</u> per annum. The average number of residential planning permissions granted over the same period is 152 per annum, so the average lapse rate is 11%. The Council therefore considers that there is a reasonable prospect that most of the supply from small sites with planning permission but not yet underway (totalling 171 <u>288</u> homes <u>in 2011/12</u>) will come forward in the short term. In accordance with the National Planning Policy Framework (2012) no allowance is made for the contribution towards housing supply from future windfall development; nevertheless it is likely that small sites will continue to make some modest contribution to housing supply negating the impact of any lapses upon the 171 <u>288</u> homes currently consented but not yet underway on small sites outside of the Harrow & Wealdstone Intensification Area.</p> <p>Outstanding Housing Capacity of All Small Sites (2011/12 data provisional)</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Source</th> <th>Gross</th> <th>Net</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Harrow on the Hill and Sudbury Hill</td> <td>Small sites with planning permission not yet under construction</td> <td>4</td> <td>3</td> </tr> <tr> <td>Small sites under construction</td> <td>4</td> <td>2</td> </tr> <tr> <td>Small conversions/changes of use not yet being implemented</td> <td>4</td> <td>2</td> </tr> <tr> <td>Small conversions/changes of use being implemented</td> <td>6</td> <td>5</td> </tr> <tr> <td>Sub Area Total:</td> <td>18</td> <td>12</td> </tr> <tr> <td rowspan="4">South Harrow</td> <td>Small sites with planning permission not yet under construction</td> <td>10</td> <td>8</td> </tr> <tr> <td>Small sites under construction</td> <td>1</td> <td>1</td> </tr> <tr> <td>Small conversions/changes of use not yet being implemented</td> <td>14</td> <td>11</td> </tr> <tr> <td>Small conversions/changes of</td> <td>4</td> <td>2</td> </tr> </tbody> </table>				Area	Source	Gross	Net	Harrow on the Hill and Sudbury Hill	Small sites with planning permission not yet under construction	4	3	Small sites under construction	4	2	Small conversions/changes of use not yet being implemented	4	2	Small conversions/changes of use being implemented	6	5	Sub Area Total:	18	12	South Harrow	Small sites with planning permission not yet under construction	10	8	Small sites under construction	1	1	Small conversions/changes of use not yet being implemented	14	11	Small conversions/changes of	4	2
Area	Source	Gross	Net																																				
Harrow on the Hill and Sudbury Hill	Small sites with planning permission not yet under construction	4	3																																				
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South Harrow	Small sites with planning permission not yet under construction	10	8																																				
	Small sites under construction	1	1																																				
	Small conversions/changes of use not yet being implemented	14	11																																				
	Small conversions/changes of	4	2																																				

Ref	Page	Policy/ Paragraph	Main Modification			
				use being implemented		
				Sub Area Total:	29	22
			Rayners Lane and North Harrow	Small sites with planning permission not yet under construction	5	-1
				Small sites under construction	12	12
				Small conversions/changes of use not yet being implemented	30	19
				Small conversions/changes of use being implemented	12	7
				Sub Area Total:	59	37
			Pinner and Hatch End	Small sites with planning permission not yet under construction	25	14
				Small sites under construction	14	10
				Small conversions/changes of use not yet being implemented	15	11
				Small conversions/changes of use being implemented	0	0
				Sub Area Total:	54	35
			Stanmore and Harrow Weald	Small sites with planning permission not yet under construction	59	36
				Small sites under construction	21	17
				Small conversions/changes of use not yet being implemented	14	10
				Small conversions/changes of use being implemented	8	5
				Sub Area Total:	102	68
			Edgware and Burnt Oak	Small sites with planning permission not yet under construction	1	1
				Small sites under construction	0	0
				Small conversions/changes of use not yet being implemented	19	15
				Small conversions/changes of use being implemented	14	1

Ref	Page	Policy/ Paragraph	Main Modification			
				Sub Area Total:	34	17
			Kingsury and Queensbury	Small sites with planning permission not yet under construction	0	0
				Small sites under construction	4	4
				Small conversions/changes of use not yet being implemented	10	5
				Small conversions/changes of use being implemented	0	0
				Sub Area Total:	14	9
			Kenton and Belmont	Small sites with planning permission not yet under construction	0	0
				Small sites under construction	2	1
				Small conversions/changes of use not yet being implemented	10	5
				Small conversions/changes of use being implemented	2	1
				Sub Area Total:	14	7
			Harrow and Wealdstone Remaining Area	Small sites with planning permission not yet under construction	18	12
				Small sites under construction	2	2
				Small conversions/changes of use not yet being implemented	23	15
				Small conversions/changes of use being implemented	4	2
				Sub Area Total:	47	31
			Sub total		371	238
			HWIA	Small sites with planning permission not yet under construction	24	22
				Small sites under construction	3	0
				Small conversions/changes of use not yet being implemented	11	10
				Small conversions/changes of use being implemented	23	18

Ref	Page	Policy/ Paragraph	Main Modification				
				use being implemented			
				Sub Area Total:	61	50	
				Grand Total	432	288	
MM541	254	A.10	<i>Substitute table of Housing Capacity of Allocated sites with;</i>				
			Area	Ref	Address	Gross	Net
			Harrow on the Hill and Sudbury Hill	EM1	Northolt Road business use area (north), South Harrow	50	50
				H1	1-5 Sudbury Hill, Harrow	54	49
				H4	205-209 Northolt Road, South Harrow	10	7
					Sub Area Total:	114	106
			South Harrow	R5	Roxeth Library & Clinic, Northolt Road, South Harrow	34	34
				EM1	Northolt Road business use area (south), South Harrow	100	100
				H5	1 & 1A Silverdale Close, Northolt	6	6
				H6	Former Matrix PH, 219 Alexandra Avenue, South Harrow	29	28
					Sub Area Total:	169	168
			Rayners	R2	Units south	15	15

Ref	Page	Policy/ Paragraph	Main Modification					
			Lane and North Harrow		of Rayners Lane Station, Alexandra Avenue, Rayners Lane			
				EM2	Rayners Lane Offices, Imperial Drive, Rayners Lane	150		150
				H8	Former Rayners Hotel, 23 Village Way East, Rayners Lane	28		27
				H9	Land at Rayners Lane Station, High Worples, Rayners Lane	50		50
				H11	Enterprise House, 297 Pinner Road, North Harrow	6		6
				G03	St. George's Playing Field, Pinner View, North Harrow	27		27
				G07	North Harrow Methodist Church, Pinner Road, North Harrow	48		48
					Sub Area Total:	324		323
			Pinner and Hatch End	H12	Rear of 57-65 Bridge Street,	26		26

Ref	Page	Policy/ Paragraph	Main Modification				
					Pinner		
					Sub Area Total:	26	26
			Stanmore and Harrow Weald	R7	Anmer Lodge and Stanmore car park, The Broadway, Stanmore	105	105
				H13	Jubilee House, Merrion Avenue, Stanmore	35	35
				H14	Land at Stanmore Station, London Road, Stanmore	44	44
				GB2	Royal National Orthopaedic Hospital, Brockley Hill, Stanmore	127	127
					Sub Area Total:	311	311
			Edgware and Burnt Oak	H18	Edgware Town Football Club, Burnt Oak Broadway, Edgware	189	189
				H19	Hill's Yard, Bacon Lane, Edgware	28	28
				H20	19 Buckingham Road, Edgware	7	7
				H21	Land at Canons Park Station, Donnefield Avenue, Canons	17	17

Ref	Page	Policy/ Paragraph	Main Modification					
					Park			
					Sub Area Total:	241	241	
			Kenton and Belmont	G06	Kenton Lane Farm, Kenton Lane, Belmont	32	30	
					Sub Area Total:	32	30	
			Harrow and Wealdstone (remaining area)	H23	Former Tyneholme Nursery, Headstone Drive, Wealdstone	15	15	
				H24	16-24 Lowlands Road, Harrow	9	9	
					Sub Area Total:	24	24	
					Grand Total:	1241	1229	
MM542 to 600			<i>These modification numbers are not used.</i>					

Annex;

Delivery Summary 2009/10 to 2025/26

Area	Completions 2009/10 & 2010/11		Completions 2011/12 (Final)		Allocated Sites		Pipeline Supply - Large Sites 2011/12 (Final)		Pipeline Supply - small sites 2011/12 (Final)		Totals	
	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
Harrow on the Hill & Sudbury Hill	54	49	24	22	114	106	0	0	18	12	210	189
South Harrow	294	247	210	21	169	168	172	52	29	22	874	510
Rayners Lane & North Harrow	151	121	50	42	324	323	165	71	59	37	749	594
Pinner & Hatch End	52	34	27	23	26	26	152	42	54	35	311	160
Stanmore & Harrow Weald	22	9	78	56	311	311	162	150	102	68	675	594
Edgware & Burnt Oak	231	218	235	230	241	241	426	422	34	17	1167	1128
Kingsbury & Queensbury	20	17	16	10	0	0	0	0	14	9	50	36
Kenton & Belmont	22	10	5	4	32	30	0	0	14	7	73	51
Harrow & Wealdstone (remaining area)	165	87	36	25	24	24	13	10	47	31	285	177
Totals	1011	792	681	433	1241	1229	1090	747	371	238	4394	3439
HWIA	114	102	14	12	3262	3262	269	267	61	50	3720	3693
Grand Total	1125	894	695	445	4503	4491	1359	1014	432	288	8114	7132

Appendix C– AAPLP Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, including the minor modifications submitted at the time, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM601	8	1.6 and figure 1.3	<i>Delete figure 1.3 and text; Figure 1.3 illustrates where we have reached in the statutory process of preparing the plan. Amend 1.6 as follows; The AAP has been developed to date with the help of a range of stakeholders and other bodies, whose assistance is acknowledged.</i>
MM602	8	1.8	<i>Amend as follows; The policies and proposals set out in this Pre-Submission consultation document <u>Area Action Plan</u> are the end result of a process which identified and considered a range of options for achieving the plan's objectives for the regeneration of this area <u>the Heart of Harrow</u>. Strategic options were identified and consulted upon in the Issues and Options report (May 2011), and evaluated in the Preferred Options report (January 2012) and by the sustainability appraisal. The results of the two rounds of public consultation undertaken to date, and how these have then <u>informed each iteration of the final draft of the AAP, which was subject to further consultation (July 2012) and an Examination in Public (January 2013) are detailed in the consultation reports available on the Council's website.</u></i>
MM603	9	1.13 – 1.20	<i>Delete paragraphs 1.13 to 1.20, including headings.</i>
MM604	11	1.22	<i>Delete paragraph 1.22 and heading Next Step</i>
MM605	35	AAP1	<i>Amend introduction to section A as follows; A. Development within all three sub areas of Harrow town centre will be required to strengthen its character, legibility and role as a Metropolitan centre. Proposals should <u>have regard to the general design principles identified in paragraph 4.3 and should:</u></i>
MM606	36	4.2	<i>Amend as follows; The Heart of Harrow represents the next chapter in Harrow town centre's development history and, whilst many existing buildings are likely to remain, the redevelopment of sites in the centre offers a unique opportunity to <u>meet changing needs and to</u> create a more coherent architectural response. <u>The aim of Policy AAP1 is to ensure in particular, that</u> the design of new development should <u>reflects and reinforces its the town centre's</u> status in the London context. This means more than just the intensity, bulk and scale of development. It is about the design and quality of new development, <u>and how it.</u> Proposals should be of a much higher design and material quality than currently</i>

Ref	Page	Policy/ Paragraph	Main Modification
			exhibited. They should incorporate distinctive, creative, contemporary design that is also subtle and sensitive, responds to the immediate surroundings and include high quality finishes that communicate the centre's future as a modern, thriving place. They should make an attractive contribution to the town centre when viewed not only from the street level but from approaches into the town centre, and where appropriate, within the skyline of the town centre when viewed at a distance. Bland and unresponsive design is unlikely to strengthen Harrow town centre's character and appearance, nor contribute to the creation of a distinctive, identifiable place.
MM607	38	4.5	<u>Amend as follows; There is need to provide for a range of activities within the three sub areas of Harrow town centre including office, retail, services, cultural, leisure & entertainment, residential and hotel accommodation, community facilities and supporting infrastructure. The intention of the Area Action Plan is to enable those needs to be fully met. Beyond matters of architectural merit, the Plan recognises that the sustainability of Harrow town centre depends upon it being a mixed use area, able to adapt and change over time to respond to changes in economic and market conditions. Within this context, the comprehensive redevelopment of existing sites and buildings provides the best potential to meet the aims of the AAP to strengthen Harrow town centre's character and appearance whilst ensuring new development is functional. Therefore, new buildings should be designed to be highly adaptable to be reused for a variety of purposes, and can overcome potential tensions and requirements for compromise within and beyond the development site boundary. For example, open structural frames and more than minimum floor to floor heights should be considered, particularly at ground and first floor levels.</u>
MM608	38	4.6 – 4.12	<i>Delete paragraphs 4.6 to 4.12</i>
MM609	39	4.14 – 4.17	<i>Delete paragraphs 4.14 to 4.17</i>
MM610	40	AAP2	<u>Amend subsection A b as follows; b. Provide active, viable and serviceable non-residential ground floor frontages</u>
MM611	40	AAP2	<u>Add to subsection A d; On sites that create new public realm, the Council will require a consistent finish that will result in a seamless connection with the planned or delivered improvements in Station Road.</u>
MM612	40	4.18	<u>Amend as follows; Station Road currently suffers from a poor environment and no distinctive identity. Consistent with the spatial development strategy, Station Road's role within the Heart of Harrow will be one of a 'high road' linking a modern and diverse Harrow town centre with the more Victorian, industrial character of Wealdstone. Although the smallest component of the Heart of Harrow, the redevelopment of sites within the Station Road sub area still have an appreciable contribution to make to the Heart of Harrow's job and housing growth targets and offer the opportunity to create an urban boulevard character along the Station Road frontage. The</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>Policy therefore seeks to realise the potential that exists, through redevelopment, to provide an active frontage along both sides of the road, to improve the continuity of building lines, reduce the presence of unsightly and unused forecourts, and to provide a more coherent streetscene. A simple, uncomplicated but modern design, exhibiting quality external finishing, along the Station Road frontage is preferred as is likely to be the most effective way of achieving a coherence between different developments and existing buildings along the Station Road frontage. Marked changes of scale within parades will not be considered acceptable.</u>
MM613	41	4.19	<i>Delete paragraph 4.19</i>
MM614	41	4.20	<i>Delete first four sentences.</i>
MM615	41	4.21	<i>Amend final sentence as follows; On sites that create new public realm, the Council will require a consistent finish that will result assist in providing a seamless connection with the planned or delivered improvements along the remainder of in the Station Road boulevard, and again aid in providing much needed continuity.</i>
MM616	41	4.22	<i>Delete final sentence and amend penultimate sentence as follows; However sites in Station Road also interface with quieter, more suburban residential areas to the east and west and this relationship needs to be carefully managed. of the boulevard.</i>
MM617	41	4.23 and 4.24	<i>Delete paragraphs 4.23 and 4.24</i>
MM618	42	4.25	<i>Delete final sentence and amend penultimate sentence as follows; The cladding is now coming to the end of its useful life and it is considered that its removal, and its removal would provide an opportunity for the restoration of the original façade, which would be a major asset in the streetscene of Station Road.</i>
MM619	42	AAP3	<i>Insert following section B; <u>New development within the three sub areas of Wealdstone is expected to contribute to a programme of urban realm enhancements based around Harrow & Wealdstone Station and the promotion of better east-west pedestrian and cycle links (See AAP7).</u></i>
MM620	43	4.26	<i>Amend first sentence as follows; The <u>Plan spatial development option</u> seeks to exploit the potential of Wealdstone as a separate and distinctive development location to Harrow town centre, and seeks better east-west linkages across its wider extents.</i>
MM621	43	4.26	<i>Amend final sentence as follows; The Intensification Area provides the opportunity, through development, to restore and indeed strengthen Wealdstone's distinctive <u>historical</u> identity and environment for business and industrial activity and family living.</i>
MM622	43	4.27	<i>Delete first sentence</i>
MM623	44	4.28 and 4.29	<i>Delete paragraphs 4.28 and 4.29</i>
MM624	44	4.30	<i>Amend as follows; Perceptions of crime and poor safety within</i>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Wealdstone can have a significant psychological effect on people's willingness to use the centre and in turn, therefore, creates a significant self-fulfilling barrier to regeneration. This is not aided by Wealdstone Station, which has <u>a particularly isolated feel, separated from the High Street by oversized roadscape and poor environs at the station entrance.</u></p> <p>Increasing levels of activity for all within the centre, particularly during the evening, and exploiting opportunities to design-out crime will make an immediate difference and will therefore be afforded a high priority when considering development proposals within and adjoining the district centre. Segregation of developments from the centre through the use of railings, gates and other physical measures does not achieve the objective of improving conditions throughout the centre as a whole and will be resisted.</p>
MM625	45	AAP4	<u>Add; D Where more sensitive character and appearance relationships exist between a site and its surroundings, the Council will expect this to be satisfactorily resolved through the design process.</u>
MM626	45	4.32	<i>Delete final sentence</i>
MM627	45	4.33	<i>Delete final sentence and amend first sentence as follows; Lifetime neighbourhoods (see Policy DM2 of the Development Management Policies DPD) are a natural extension of the lifetime home principle; that is, neighbourhoods which are accessible and comfortable for everyone regardless of age, health and physical ability.</i>
MM628	45	4.34	<i>Amend final two sentences as follows; Where opportunities arise to improve safe pedestrian and cyclist permeability within the Area or from adjoining areas, the Council will expect these to Plan seeks to ensure these can be fully exploited in the design and layout of the proposal. Likewise the extension and enhancement of the Harrow Proposals should also implement, through design and layout, or contribute to the implementation of any Green Grid projects that are relevant to the site.</i>
MM629	46	4.35	<i>Delete third and fourth sentences (including points a to g) and amend second sentence as follows; Within the Heart of Harrow, the development of homes to higher densities than traditionally achieved in Harrow will require innovative design to ensure appropriate sustainability measures can still be accommodated and established concepts of privacy and amenity are still met (see Policy DM1 of the Development Management Policies DPD).</i>
MM630	46	4.36 – 4.39	<i>Delete paragraphs 4.36 to 4.39</i>
MM631	47	4.41 – 4.43	<i>Delete paragraphs 4.41 to 4.43 and substitute; A range of development typologies and densities have been modelled as part of the preparation of this AAP ^[Footnote] and, informed by public consultation and the selection of a preferred spatial option for the Intensification Area, the homes and jobs targets identified in Chapter 5 are the result of that work. Addressing the relevant site constraints/dependences, design considerations and infrastructure requirements will help to ensure that development addresses growth in a sustainable</i>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>manner. The successful delivery of sustainable growth within the Heart of Harrow relies to a significant degree, on the planned sustainable development of the sites allocated in chapter 5.</u> [Footnote] See the Harrow & Wealdstone AAP issues and options document and (2011) and the Heart of Harrow baseline report and technical papers (2011).
MM632	48	4.44	<i>Amend as follows;</i> The Council anticipates that windfall development sites will also come forward within the Heart of Harrow during the life of this Plan. Having allocated sufficient sites to meet and exceed the Area's minimum housing and jobs targets, previously-developed windfall sites offer the opportunity for additional growth and investment, which will be welcomed <u>where it is consistent with the policies of the Plan and</u> . As with allocated sites, the Council will expect proposals for development on windfall sites proposals to contribute to the <u>delivery of the</u> strategic and sub area objectives.
MM633	48	4.45	<i>Amend as follows;</i> Within the Heart of Harrow, new housing development is expected to deliver higher densities than traditionally achieved in Harrow. However, higher densities are not synonymous with over development. Development proposals should achieve densities in accordance with The London Plan sustainable residential quality density matrix; which seeks to optimise the potential of sites, taking account of a range of other factors including local context, design, the delivery of a high quality living environment and supporting infrastructure. Development viability considerations alone will not justify an appropriate density for a site being exceeded.
MM634	48	4.46	<i>Delete final two sentences and amend third sentence as follows;</i> Elsewhere throughout the Heart of Harrow, a graded transition between development and existing residential areas <u>will be more appropriate to the local context</u> is sought.
MM635	48	4.47	<i>Delete final sentence and preface paragraph by adding;</i> <u>Potential site layouts shown in Chapter 5 for each site justify site allocations by demonstrating feasibility; they are indicative only, not prescriptive.</u>
MM636	49	AAP6	<i>Delete section D, amend subsection E d as follows;</i> d. Be slender and elegant in design, <u>tiered and stepped where necessary to further reduce bulk,</u> and not slab like when viewed from any direction; <i>Amend subsection E f as follows;</i> f Contribute to the overall townscape, <u>both during the day and night,</u> and achieve a positive relationship with surrounding topographical features and buildings at all sides; <i>Amend subsection E k as follows;</i> k. Secure a complete and well designed setting at street level, <u>including active ground floor uses,</u> and positively define the character of the public realm.; <i>Delete section G and substitute;</i> <u>Proposals for or resulting in clusters of tall landmark buildings are inappropriate within the Heart of Harrow and will be resisted.</u>
MM637	50	4.49	<i>Amend as follows;</i> The Heart of Harrow will see significant private sector investment in new development over the next fifteen years. Proposals have and will continue to come forward that challenge the existing urban form, including

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			buildings heights and densities. The appropriate height of new development on allocated sites will be informed by the parameters set out in Chapter 5 <u>have been arrived at having regard to the Heart of Harrow Urban Character Analysis (2012) and the outcome of consultation on alternative strategic options for growth that was undertaken in the course of preparing the AAP and will require assessment against the relevant policies set out above.</u>
MM638	50	4.50 – 4.52	<i>Delete paragraphs 4.50 to 4.52</i>
MM639	51	4.54 -4.56	<i>Delete paragraphs 4.54 to 4.56</i>
MM640	51	4.57	<i>Add; Policy AAP6 fulfils this requirement for the Heart of Harrow. If necessary, further supplementary guidance will be provided to aid clarity to the policy's application.</i>
MM641	51	4.58	<i>Amend as follows; <u>The evidence underpinning the AAP demonstrates that tall Tall buildings are not an essential part of the urban intensification of the Heart of Harrow[Footnote]. Having regard to this urban design analysis undertaken by East Architects to inform the preparation of the AAP, the role and function tall buildings are to perform in the context of the spatial strategy for the Heart of Harrow are as 'landmark' buildings to help orientate and identify locations of public importance such as strategic community and civic uses, major public transport interchanges or areas of important public urban realm that provide relief from the street environment and opportunity to pause and relax. [Footnote] See Heart of Harrow Urban Character Analysis (2012) and the Harrow and Wealdstone Area Action Plan Regulation 21(1)(c)(i-iv) Consultation Statement (May 2012)</u> In contrast to other parts of London, tall buildings are not required to provide a solution to housing need; alleviate a strain on the road network; provide a catalyst for regeneration; or signal a critical mass of commerce activity.</i>
MM642	52	4.59	<i>Delete paragraph 4.59 and sub heading</i>
MM643	52	4.60	<i>Delete final sentence and bullet points</i>
MM644	52	4.61	<i>Delete first and final sentences and add; <u>and, even if exhibiting architectural merit, if poorly related to the local context can have a negative impact on that context.</u></i>
MM645	52	4.62 – 4.69	<i>Delete paragraphs 4.62 to 4.69 including sub headings</i>
MM646	53	4.70	<i>Delete final sentence and amend third sentence as follows; <u>Consistent with London Plan Policy 7.7C(h) the Council considers that proposals for taller and tall landmark buildings within the Heart of Harrow therefore may offer the opportunity for the public to enjoy views available from these higher buildings, from viewing galleries and platforms. recognising that the provision of publicly accessible areas on upper floors is likely to depend upon the feasibility of achieving suitable means of access for the public and the viability of uses needed to sustain that access.</u></i>
MM647	54	AAP7	<i>Add to section A; through:</i>

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			<p><u>a. use of an approved, simple palette of sustainably sourced surface materials;</u> <u>b. a reduction in street clutter and the rationalisation of existing street furniture wherever possible; and</u> <u>c. judicious implementation of electric car charging points, wayfinding signs and infrastructure for cyclists, where these do not add to street clutter.</u></p> <p><u>Where required, and where directly related to a development scheme, such improvements will be secured through the use of Planning Obligations.</u></p> <p><i>Delete second sentence of section E</i></p>
MM6478	54	4.72	<p><i>Preface by adding; The Heart of Harrow Urban Character Analysis (2012) criticised the quality of the public realm across all sub areas that make up the Heart of Harrow. It found that the generally low standard of Harrow town centre's public realm undermines the centre's Metropolitan centre status, whilst the environment of Station Road is uninviting to pedestrians and cyclists, and Wealdstone's public realm is at best functional. Even in more transitional/leafy parts of the Heart of Harrow, the public realm is let down by poor quality surface materials, lighting and other street furniture.</i></p> <p><i>Delete final two sentences including bullet points</i></p>
MM649	55	4.73	<i>Delete paragraph 4.73</i>
MM650	56	4.79	<i>Delete paragraph 4.79</i>
MM651	56	4.80	<i>Delete final sentence</i>
MM652	57	AAP8	<i>Insert additional section following section A; <u>Telecommunications equipment and other apparatus of a scale that would appear in the urban silhouette of the Heart of Harrow will not be permitted.</u></i>
MM653	58	4.90	<i>Delete second sentence</i>
MM654	58	4.92	<i>Delete second sentence</i>
MM655	58	4.94	<p><i>Amend as follows; All local views[Footnote] of public value are identified within Schedule 4 of the Development Management Policies DPD. Identified opportunities to open up new views are shown on the site allocations in Chapter 5, and the Council will give due weight to opportunities that may emerge for 'windfall' new views and vistas of public value. The identification of local views and new view opportunities has been informed by the Harrow Views Assessment (2012), which was commissioned to provide a comprehensive re-appraisal of all views previously identified in the Harrow Unitary Development Plan (2004) and an assessment of the potential public value of other, previously unidentified views or view opportunities. The Study was carried out in accordance with the London View Management Framework. <u>The Assessment (2012) also found that, at present, there are few visual connections between Harrow town centre and St. Mary's Church, and that further views from St. Ann's Road, College Road and Greenhill Way</u></i></p>

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			would provide a stronger sense of place and a greater degree of legibility. Once lost to development, opportunities to create new views are unlikely to be regained. Identified opportunities to open up new views are shown on the site allocations in Chapter 5, and over the plan period further opportunities may emerge for 'windfall' new views and vistas of public value. [Footnote] This includes views out from Harrow Hill and views towards the Green Belt, as well as views specifically of Harrow Hill and St. Mary's Church.
MM656	59	4.95	Delete final sentence
MM657	61	AAP9	Add to section B; Finished floor levels must be designed to be at least 300mm above the 1 in 100 flood level, including an allowance for climate change, and be fitted with flood resilience measures to 0.5m above finished floor level. Development that involves the formation of new basements, or the change of use of existing basements, must have regard to flood risk and ensure that this is specifically addressed through the Flood Risk Assessment. The installation of resilience measures to basements will be required. Proposals for the formation of new dwellings or additional habitable accommodation within basements will be refused.
MM658	63	4.105	Delete first sentence
MM659	63	4.106	Delete paragraph 4.106
MM660	63	4.107	Amend as follows; In relation to the regeneration of Wealdstone, similar considerations will be used where it becomes necessary to apply the exception test. By definition, the <u>exception</u> test is designed to separate proposals that, exceptionally, should be allowed notwithstanding the risk of flooding from those which should be directed to more appropriate sites. Whilst <u>In consideration of the exception test,</u> this policy affords a high priority to the physical and social regeneration of Wealdstone, it will be for applicants to demonstrate how the proposal contributes to the Area Action Plan's objectives. In addition to the fulfilling the sequential and exception tests, a Flood Risk Assessment must also be produced when detailed proposals come forward on non allocated sites. As with allocated sites, the Flood Risk Assessment is required to demonstrate that the proposed development will be resistant, resilient and safe from flooding, will not increase flood risk elsewhere and, where possible, will reduce overall flood risk - further detail is provided below.
MM661	64	4.111	Delete final two sentences and amend first sentence as follows; All major development and change of use proposals will be required to use sustainable drainage systems, unless there are practical reasons for not doing so, to <u>Sustainable Urban Drainage Schemes</u> and other measures can help to reduce the existing surface water run-off rate of the site, with the aim of achieving a greenfield run-off rate where this is feasible.
MM662	64	4.112	Amend as follows; On large development sites, including those that create new streets/public realm, consideration will also be given to the need for 'pathway' measures. Again, The Surface

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			Water Management Plan (2011) <u>also</u> provides a range of examples of <u>'pathway' measures</u> : flood infrastructure maintenance, drainage capacity enhancements (where absolutely necessary), separation of foul and surface water sewers, management of overland flows and land management practices. With regard to drainage capacity enhancement, for these sites where Thames Water has raised notes that there are concerns regarding the sewerage network capacity to serve a number of the proposed developments sites ^[Footnote] , <u>and that a drainage strategy will need to be produced by the developer in liaison with Thames Water. This is to include a detailed model of the network capacity to determine if mitigation is required. The drainage strategy is likely to be required to ensure sufficient capacity exists within the network to serve the proposed development and to identify any appropriate mitigation, including network upgrades, are undertaken ahead of occupation of the development.</u> ^[Footnote] In response to consultation on the AAP Preferred Option Thames Water raised concerns regarding the waste water services in relation to AAP Opportunity Sites 2, 3, 4, 5, 6, 7, 9, 13, 16, 18, 22 & 23
MM663	64	4113	<i>Delete two final sentences</i>
MM664	64	4.114	<i>Delete two final sentences</i>
MM665	65	4.115	<i>Amend as follows</i> ; In many cases the use of sustainable drainage techniques, <u>such as green roofs</u> , not only help to solve a drainage problem, but <u>can also contribute to other policy objectives such as nature conservation and water use efficiency.</u> have other sustainability benefits. In particular, measures that help to reduce demand for mains water (such as rainwater harvesting) and which make a positive contribution to biodiversity (green roofs, swales, detention basins, ponds and wetlands) will be preferred.
MM666	65	4.116 – 4.122	<i>Delete paragraphs 4.116 to 4.122</i>
MM667	66	4.124	<i>Delete heading and amend final sentence as follows</i> ; Within the Heart of Harrow a district-wide combined heat and power network will be promoted. and all major development within the Heart of Harrow should be designed to connect to the network and make appropriate on-site site-wide CHP network provision.
MM668	67	4.126 – 4.128	<i>Delete paragraphs 4.126 to 4.128, including headings</i>
MM669	69	4.134	<i>Delete second sentence and substitute</i> ; <u>Therefore, improvements to the quantity and carrying capacity of open space secured through new development is an important dimension of the sustainable accommodation of growth within the Heart of Harrow.</u>
MM670	69	4.135	<i>Delete three final sentences</i>
MM671	69	4.136	<i>Preface with</i> ; <u>Civic spaces are a form of open space that includes market squares, and are important community spaces for events and more generally as areas of respite, offering a</u>

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			<p><u>chance to sit down. They also assist in providing a setting for buildings</u>^[Footnote a].</p> <p>^[Footnote a] See <u>paragraph 12.1 of Harrow PPG 17 Study.</u></p> <p><u>Delete two final sentences and footnote 30 and add; The PPG 17 Study reveals the sparse distribution of Harrow's civic spaces and their variability in quality.</u></p>
MM672	69	4.137	<p><i>Amend as follows;</i> The PPG 17 Study also demonstrates that there is poor accessibility within the Heart of Harrow to play provision for under fives and for children aged 5 to 11 years. Therefore, <u>additional provision as part of new development will help to meet the needs generated by growth</u> the development and help address accessibility within the Area proposals <u>generating a child yield will be required to make provision on site for play space. The recommended standard of provision set out in the PPG 17 Study, of 4 square metres per child, will be sought as a minimum, with an aspiration to achieve the 10 square metre per child provision as identified within the Mayor of London's supplementary planning guidance 'Providing for Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation'.</u></p>
MM673	69	4.138	<p><i>Amend second sentence as follows;</i> Major residential development is likely to increase pressure on outdoor sport pitches serving the Heart of Harrow. <u>Improvements in the quality and carrying capacity of pitches will help to meet the needs generated by growth within the Area</u> and proposals will therefore be required to secure, through Planning Obligations, improvements to the quality and/or carrying capacity of pitches consistent with that made necessary by the proposal.</p>
MM674	70	4.139	<p><i>Delete two final sentences including footnote 31 and substitute;</i> <u>Large redevelopment sites offer the potential to provide both land for new development as well as for new local park provision.</u></p>
MM675	70	4.140 – 4.147	<p><i>Delete final sentence of paragraph 4.140 and paragraphs 4.141 to 4.147 including headings</i></p>
MM676	72	4.149	<p><i>Delete third and fourth sentences and amend subsequent sentences as follows;</i> As a minimum, Proposals should <u>may</u> be capable of providing simple design features such as bird and bat boxes or 'bee hotels', and incorporating wildlife friendly plants into the overall landscaping and planting scheme. On larger sites, and where feasible in terms of design and development viability, more ambitious habitat creation such as living roofs and walls, deculverting and use of recycled rainwater will be sought <u>can be achieved.</u></p>
MM677	72	4.152	<p><i>Amend as follows;</i> Across the Borough there are many Sites of Nature Conservation Importance but none are located within the Heart of Harrow. Harrow's PPG 17 Study (2011) and information supplied by Greenspace Information for Greater London demonstrates that the Heart of Harrow coincides with an area of little or no accessibility to biodiversity. Funding for the implementation of Green Grid and Biodiversity Action Plan projects will be supported through the Harrow Community Infrastructure Levy, <u>and this may be supplemented</u> but where opportunities arise for the provision of new or reconfigured</p>

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			open space in accordance with Policy AAP11. consideration should also be given to the ability of the space to improve access to nature within the Heart of Harrow. As a minimum, the location, layout and landscaping of the open space should have regard to potential biodiversity value even if the principal use of the space is for another typology, such as sport and recreation. Wherever possible, however, some of the space should contribute to the formation of new, dedicated areas of natural and semi-natural greenspace which help to meet the standards for provision recommended in Harrow's PPG 17 Study (2011)
MM678	74	4.158	Amend as follows; The Council is committed to promoting housing choice and the creation of mixed and balanced communities in accordance with the London Plan and Harrow's Core Strategy. Consistent with the objectives for the Heart of Harrow, <u>The redevelopment of sites across the Heart of Harrow offers the potential to provide a range of housing types, sizes and tenures, from flatted development within the town centres to a mix of family housing (terraced and semi-detached) as part of the mixed-use redevelopment of industrial estates.</u> will be sought throughout the Area. This is to be achieved through the different sub areas contributing a specific form of housing.
MM679	74	4.159	Amend as follows; Unless site and local circumstances dictate otherwise, commensurate with a town centre designation and high levels of public transport accessibility, the Council expects proposals within the three sub areas of Harrow town centre and the Wealdstone Central sub area to make provision for flatted development, with individual schemes providing <u>The provision of a mix of one, two and three + bedroom units is commensurate with a town centre designation and high levels of public transport accessibility, and will help to meet the identified housing needs of smaller households</u>^[Footnote c] such as single persons and couples, as well as sharing professional households. The provision of Larger development schemes (100+ dwellings) within the town centres will be expected to make provision for a greater portion of larger unit sizes (3 bedrooms +) within the town centres is likely to offer an alternative and more affordable option to Harrow's traditional 3 bedroom terraced and semi-detached suburban housing stock their proposed housing mix. ^[Footnote c]<u>The Strategic Market Assessment (2011) identifies that the greatest housing need in Harrow is for two bedroom market and affordable housing.</u>
MM680	74	4.160	Amend as follows; Within the Station Road sub area, there is <u>potential to deliver</u> Council expects proposals for two and three bedroom flatted units, making the most of the larger commercial ground floor footprint and opportunities to provide dual aspect. Again, such provision will help meet the needs of certain families and sharing professional households.
MM681	74	4.161	Amend as follows; Within the remaining sub areas of Wealdstone East and West, unless site and local circumstances dictate otherwise, the Council expects proposals to make <u>provision for delivery of a mix of family housing of different</u>

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			types (terraced and semi-detached) and sizes (two bedroom through to four bedrooms +), commensurate with <u>can help to achieve</u> the Plan's objectives to reinforce and create a new Metroland character on these large vacant and underutilised brownfield industrial and suburban sites, exploiting ready access to open spaces, leisure and education facilities.
MM682	74	4.164	<i>Delete final sentence</i>
MM683	75	4.165	<i>Delete final sentence. Transfer penultimate sentence into a footnote and add to third sentence;</i> <u>where the dominant form of housing provision over recent years has been social affordable housing</u> ^[Footnote d] .
MM684	75	4.166	<i>Delete paragraph 4.166</i>
MM685	75	4.168	<i>Amend as follows;</i> Access to amenity space is a highly valued component of the quality of life in outer London and one which the Council is committed to maintaining. Flatted residential developments in Harrow have traditionally provided communal outdoor garden areas and, while this may still constitute a suitable form of outdoor space for some proposals within the Heart of Harrow, for higher density schemes, particularly within the town centres, other forms of provision may also be appropriate, including Courtyards , roof gardens and useable balconies ^[Footnote] will be acceptable alternatives to traditional garden spaces for flatted developments, but balconies that do not meet minimum size standards and Juliette balcony features will not be accepted as contributing to usable, outdoor space. New houses, particularly family houses, should continue to be provided with their own private garden areas. ^[Footnote] Harrow's Residential Design Guide SPD (2010) advises that balconies should be at least 1.5 metres in depth and of sufficient size to be used as a sitting out area.
MM686	75	4.169	<i>Delete paragraph 4.169</i>
MM687	77	4.177	<i>Delete all except first sentence and add;</i> <u>and, in so doing, help to deliver the plan's target for new jobs within the Heart of Harrow.</u>
MM688	77	4.178	<i>Amend first sentence as follows;</i> If the findings of <u>robust economic analysis</u> demonstrate that Harrow is not attractive for traditional SIL uses, the economic analysis should determine what industrial/ employment uses it would be attractive for, and in this context, the role that the Harrow SIL could play that, whilst not a traditional SIL role, nonetheless, would perform an essential strategic employment role for London, west London and the Borough.
MM689	77	4.180	<i>Delete final sentence and amend first sentence as follows;</i> Once the possible employment opportunities have been identified, and agreed with the Council and the GLA, <u>the preparation of a comprehensive masterplan will enable the site to be taken forward in a planned and comprehensive manner.</u> should be drawn up for the site that accords with the land uses, layout and design considerations identified for the site in Chapter 5.
MM690	78	4.181	<i>Delete paragraph 4.181</i>

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MM691	80	4.186	Delete first two sentences and substitute; <u>The Council is committed to facilitating continued business and industrial formation and growth.</u> Delete four final sentences and substitute; <u>The introduction of sensitive new uses can create conflicts that lead ultimately to pressure for the extinguishment of incompatible industrial and other economic uses.</u>
MM692	80	4.187	Delete second sentence.
MM693	81	4.188	Delete second sentence.
MM694	81	4.189 – 4.193	Delete paragraphs 4.189 to 4.193 including sub-heading
MM695	82	AAP16	Amend section D as follows; D. Minor proposals for the redevelopment or change of use of offices of less than 1,000 sq m of floorspace within Harrow town centre will be permitted where: a. The building is no longer fit for office occupation having regard to the level and duration of vacancies within the building; the age and condition of the building, <u>potential for refurbishment</u> and the needs of potential occupiers in the local office-market; b. An assessment of demand and supply demonstrates that there is a surplus of office space throughout the town centre of a similar scale and quality, taking into account any unimplemented planning permissions; and <u>The office vacancy rate in Harrow Town Centre has exceeded 20% for a continuous period of at least 12 months;</u> c. <u>The office space has been appropriately marketed for a period of at least 12 months without success;</u> and e <u>d.</u> The proposal contributes to the continued vitality and viability of the Metropolitan centre.
MM696	83	4.194	Delete final sentence and insert following addition after third sentence; <u>The Area Action Plan therefore seeks to ensure such development needs can be fully accommodated.</u>
MM697	83	4.195 – 4.196	Delete paragraphs 4.195 to 4.196 and sub-headings
MM698	83	4.198	Delete paragraph 4.198
MM699	84	4.200	Amend as follows; Consistent with London Plan Policies 4.2 and 4.3, the Core Strategy (2012) focuses the renewal and consolidation of the Borough's local office market upon Harrow town centre. The release and, where necessary, partial re-provision of large, redundant office space outside of the Heart of Harrow is addressed by Policy 41 of the Development Management Policies DPD. Within Harrow town centre, the redevelopment of or change of use of existing buildings which provide more than 1,000 square metres office floorspace will be supported where the proposal enables <u>provides the opportunity to secure</u> the re-provision of office floorspace that is better suited to <u>meeting</u> the needs of Harrow's local office market. The quantum of office floorspace to be provided will be determined by the suitability of the site for office use and other objectives for the development of the site. However, as a

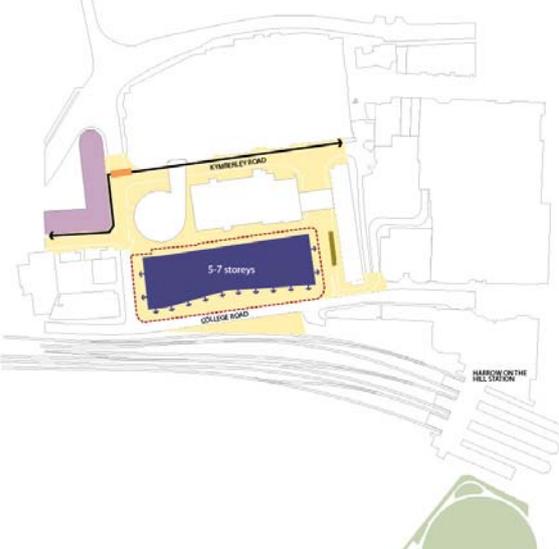
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			<p>minimum, an amount of floorspace with an office employment yield equivalent to that of the existing building will normally be sought. <u>To assist developers in bringing forward proposals,</u> Unless unless there is other evidence to demonstrate a more suitable alternative, the employment yield of existing premises will be assessed by applying a ratio of 1 employee per 20.6 square metres^[Footnote], whilst that of new office floorspace will be assessed by applying a ratio of 1 employee per 13.8 square metres^[Footnote].</p> <p>^[Footnote]Based on the London Office Policy Review (2009) lower density for outer London offices.</p> <p>^[Footnote]Based on the London Office Policy Review (2009) for calculating overall office floorspace requirements.</p>
MM700	84	4.201	<i>Delete all except first sentence</i>
MM701	85	AAP17	<i>Amend subsection D d as follows; d. The use would not be detrimental to the amenity of neighbouring occupiers (See Policy DM1) or highway safety.</i>
MM702	85	AAP17	<p><i>Amend section F as follows;</i> F. Proposals for temporary use (see Criterion G) of ground floor premises within the Primary Shopping Area will be supported where: a. The vacancy rate within the primary and secondary frontages of the centre is in excess of 10%; b. The premises has been vacant and marketed for more than a year; and c. The proposed temporary use will not be detrimental to the amenity of neighbouring occupiers (See Policy DM1) or highway safety.</p> <p><i>And add new section G as follows;</i> G. <u>The grant of temporary use will be limited to a period of two years, with discretion for a further two year period of extension of permission where vacancy levels across the town centre still remain above 10% at the time of applying for the extension. A longer period of initial temporary use may be considered where applicants can demonstrate that the proposal represents a significant level of investment in terms of remodelling and fit-out of the retail unit.</u></p>
MM703	86	4.207	<i>Amend fourth and fifth sentences as follows; This is contiguous with the town centre's core primary shopping area. and the Council will express a clear preference for major new retail development to locate within the primary shopping area of Harrow town centre. In so doing, such development <u>Major new retail development within the primary shopping area will provide the strongest possible benefit to the vitality and viability of Harrow town centre as a Metropolitan centre.</u></i>
MM704	87	4.208	<i>Add; <u>This Policy (in conjunction with Policy DM46) sets out how the sequential approach will be applied in the event that major retail development cannot be delivered on the allocated sites or any other windfall site that emerges within the primary shopping area of Harrow town centre. Nevertheless, the Council recognises that long-term retail forecasts are susceptible to a great deal of uncertainty and has therefore</u></i>

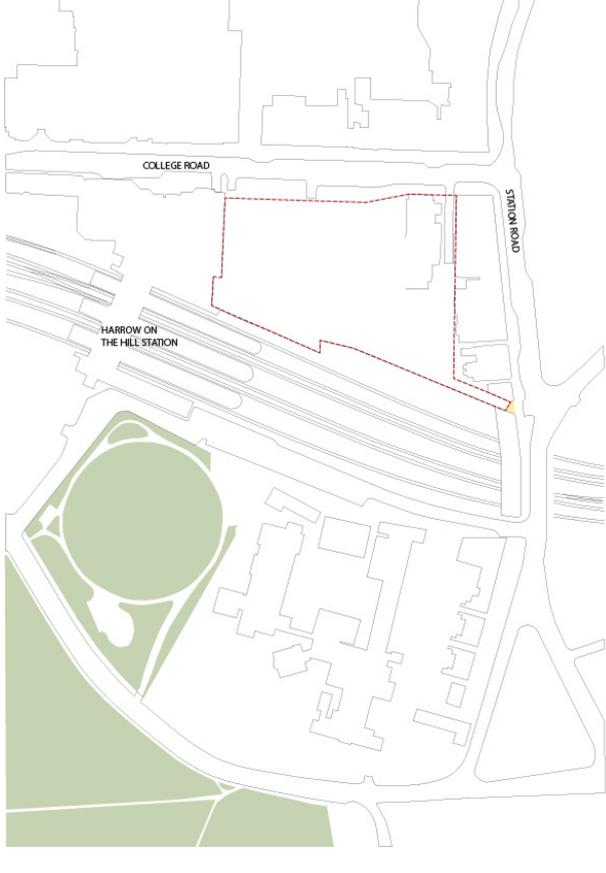
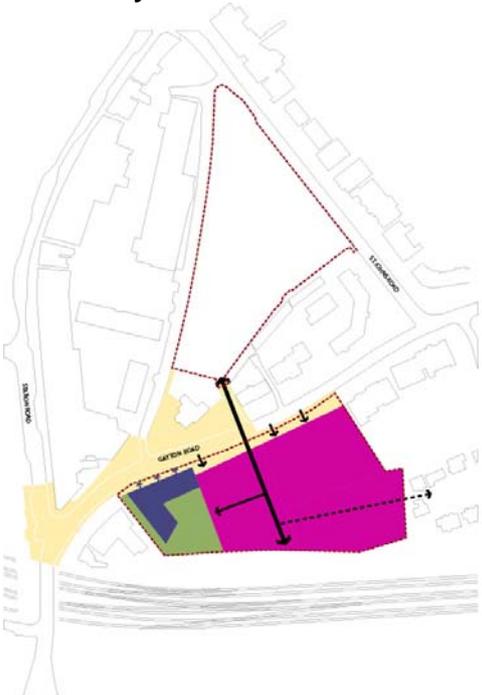
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			<u>committed to undertake a new retail study in 2014/15, to ensure sufficient land is provided both within the Heart of Harrow area and across the borough to continue to meet Harrow's retail development needs.</u>
MM705	87	4.209	<i>Delete paragraph 4.209</i>
MM706	87	4.212	<i>Delete paragraph 4.212</i>
MM707	87	4.213	<i>Delete second sentence.</i>
MM708	88	4.214	<i>Delete second sentence and substitute; The Council considers that the provision of well-designed new canopies can be a greatly appreciated amenity for shoppers and, by association, contribute to the attractiveness of the town centre.</i> <i>Amend final sentence as follows; In view of the value that existing canopies provide to shoppers within the primary shopping area, their loss can detrimentally impact on the character and vitality of this important shopping street will be resisted.</i>
MM709	88	4.215	<i>Delete second sentence and substitute;</i> <u>The National Planning Policy Framework (2012) defines primary shopping frontages as those likely to include a high proportion of retail uses, which may include food, drinks, clothing and household goods ^[Footnote g], and states that local planning authorities should set policies for uses within town centres based on a clear definition of these and other frontages ^[Footnote h]. Harrow's Retail Study (2009) concluded that there is a continuing need to monitor uses within the shopping frontages of town centres and to protect Class A uses^[Footnote i]. The Study went on to suggest changes to frontages within a number of the Borough's town centres, which have been taken forward in this Area Action Plan and the Site Allocations DPD.</u> <i>Delete fourth, fifth, sixth and seventh sentences and first word of eighth sentence and substitute;</i> <u>Therefore, having regard to its Metropolitan centre status, the Council considers that 15% is a reasonable indicator of the point at which the high proportion of retail uses appropriate to primary shopping frontage may be threatened within Harrow town centre. For Wealdstone, consistent with other district centres in the Borough, an indicator of 25% is considered to be reasonable.</u> <i>Delete final sentence and add footnotes;</i> ^[Footnote g] See NPPF Annex 2: Glossary. ^[Footnote h] See NPPF paragraph 23. ^[Footnote i] See Harrow Retail Study (2009) paragraph 18.32.
MM710	88	4.216	<i>Delete final sentence and amend third sentence as follows; By contrast takeaways (unless forming a part of a café or restaurant use) are rarely connected with shopping trips and more frequently trade as evening rather than daytime activity- for these reasons wholly take-away uses will be resisted within the primary shopping frontage of both town centres.</i>
MM711	88	4.217 and 4.218	<i>Delete paragraphs 4.217 and 4.218</i>

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MM712	89	4.220	<i>Delete two final sentences.</i>
MM713	90	AAP18	<i>Amend subsection B b as follows; b. the use would not be detrimental to the amenity of neighbouring occupiers (See Policy DM1) or highway safety</i>
MM714	90	AAP18	<i>Amend section C as follows; C. Proposals for temporary use (three to five years) of ground floor premises within secondary frontages and neighbourhood parades will be supported where: (then a and b as existing) c. The proposed temporary use will not be detrimental to the amenity of neighbouring occupiers (see Policy DM1) or highway safety.</i>
MM715	90	4.221	<i>Delete all after third sentence and substitute; The National Planning Policy Framework (2012) defines secondary shopping frontages as those that provide greater opportunities for a diversity uses such as restaurants, cinemas and businesses^[Footnote j], and states that local planning authorities should set policies for uses within town centres based on a clear definition of these and other frontages^[Footnote k]. Harrow's Retail Study (2009) concluded that there is a continuing need to monitor uses within the shopping frontages of town centres and to protect Class A uses^[Footnote l]. The Study went on to suggest changes to frontages within a number of the Borough's town centres, which have been taken forward in this Area Action Plan and the Site Allocations DPD. The Council considers that 50% is a reasonable balance of retail and non-retail uses within secondary and designated shopping frontages, having regard also to the vitality and viability of the town centre concerned. Units in non-designated parades provide opportunities for a range of commercial uses that can help to diversify the role of town centres and strengthen their vitality. ^[Footnote j] See NPPF Annex 2: Glossary. ^[Footnote k] See NPPF paragraph 23. ^[Footnote l] See Harrow Retail Study (2009) paragraph 18.32.</i>
MM716	90	4.222	<i>Delete paragraph 4.222</i>
MM717	90	4.223	<i>Delete final sentence</i>
MM718	90	4.224	<i>Delete two final sentences</i>
MM719	91	4.225	<i>Delete final sentence and amend as follows; Take aways are now an established characteristic of most town centres and they offer a valued service to shoppers (when they are open during the day), residents and pubgoers. However take away uses can also result in increased litter, noise (particularly at night) and on-street parking requiring careful consideration of these issues when such uses are proposed.</i>
MM720	91	4.226	<i>Delete all after first sentence, including footnote.</i>
MM721	91	4.227	<i>Delete final sentence.</i>
MM722	92	AAP19	<i>Delete section A</i>
MM723	93	4.231	<i>Delete paragraph 4.231.</i>

Ref	Page	Policy/ Paragraph	Main Modification
MM724	93	4.232	<i>Delete three final sentences and amend as follows; <u>The promotion of Harrow & Wealdstone as an Intensification Area, for the sustainable accommodation of growth, was in part predicated on its ability to support and encourage more sustainable transport choices.</u> Major development proposals within the Heart of Harrow offer the opportunity to provide better pedestrian and cycle connections through sites, creating a network of walkways that can provide a viable alternative to the use of the private car, especially to access local amenities. Providing safe and attractive routes that are easy to navigate and connect seamlessly with existing walkways can make a significant contribution to the overall pedestrian permeability of an area, should be prioritised within the overall scheme design. Where sites adjoin the existing cycle network, while opportunities to extend the cycle network and/or to create or link to other cycle routes will be of benefit to cyclists through the site should also be prioritised.</i>
MM725	94	4.234 – 4.236	<i>Delete paragraphs 4.234 to 4.236.</i>
MM726	96	4.242	<i>Delete final sentence.</i>
MM727	96	4.243	<i>Amend as follows; Given The Council's Depot functions will still be required over the life of the Plan any proposal for a waste treatment facility on the site must include the provision to relocate any displaced depot functions to an alternative and suitable site in the Borough. However, and the Council does not currently own any other industrial sites within Harrow upon which to relocate all or part of the existing depot site functions.-Therefore, the applicant would need to secure suitable land and buildings to enable relocation. However, if relocation of the depot functions is not possible/feasible, then the Council will entertain a consolidation of the depot functions on the site may <u>provide a suitable solution to where this can adequately satisfy the accommodation needs of both activities on the site, and on the understanding that the potential waste treatment capacity of the waste site allocation can be maintained, which may influence the type of waste facilities suitable to be provided on this site.</u></i>
MM728	97	4.244	<i>Delete all following second sentence and amend second sentence as follows; However, there is <u>are</u> also likely to be impacts at the interface with other neighbouring <u>employment generating and community uses that will need to be managed in a manner that does not prejudice their continued functioning.</u></i>
MM729	97	4.245	<i>Delete final two sentences and substitute; <u>Appropriate mitigation of any objectively assessed impacts upon this and any other junctions identified as being sensitive to increased traffic should ensure that the objectives for the site can be delivered in a manner that is compatible with the free flow and safety of traffic using the wider highway network.</u></i>
MM730	97	4.246 – 4.248	<i>Delete paragraphs 4.246 to 4.248</i>
MM731	99	4.256	<i>Amend as follows; Compulsory purchase powers exist to</i>

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			support the development of land in the public interest. They and are a tool of last resort and will be employed by the Council only when all other reasonable attempts to assemble sites through negotiation and agreement with the landowner(s) concerned have been exhausted. This will include cases where the current landowner cannot be traced, for whatever reason.
MM732	99	4.259	<i>Delete second and third sentences and amend final sentence as follows; In the event that the Council is not satisfied <u>with the relationship between the costs of compulsory purchase and scheme viability</u>, co-operation in the use of its powers will be withdrawn.</i>
MM733	101	5.2	<i>Following fourth sentence, insert; <u>Leading uses are those that make an essential contribution to delivering the objectives of this Plan and should form principal components of proposals for each site. Supporting uses are uses compatible with the leading use(s) that may form ancillary components of the overall mix of uses proposed on a site. Amend subsequent sentence as follows; Where appropriate, details of the mix of uses for the site these are accompanied by further guidance on options and dependencies, including site assembly and phasing. Add following final sentence; Where references are made to Green Grid, Public Realm or Infrastructure improvements, details of current projects and schemes can be found at www.harrow.gov.uk/infrastructuredelivery.</u></i>
MM734	102 onwards	Site diagrams	<i>Add to all site diagrams; <u>Conceptual diagram subject to detailed design considerations</u></i>
MM735	107	Site 2	<p><i>Amend illustrative diagram as follows;</i> Site 2 Kodak and Zoom Leisure</p>  <p>The diagram shows a site layout with various colored zones. A key on the right side of the diagram defines the following categories:</p> <ul style="list-style-type: none"> Site boundary (dashed red line) Strategic/Industrial Land Boundary (dashed blue line) Education (solid purple) Housing (solid pink) Employment / Housing (diagonal lines) Employment / Retail (horizontal lines) Employment (solid brown) Retail / Residential (diagonal lines) Retail / Leisure / Community (solid grey) Green open space (solid green) New public space (yellow) Key routes through site (thick black lines) Potential footbridge (dashed black line) New View to Headstone Manor (dashed red line) Energy Centre / Car Park (yellow)
MM736	135	Site 9	<i>Amend illustrative diagram as follows;</i> Site 9 Civic Centre

Ref	Page	Policy/ Paragraph	Main Modification
			 <p>09 Civic Centre</p> <p>Key</p> <ul style="list-style-type: none"> Site boundary Housing Parking/clubhouse with housing above Family housing with gardens Mixed use with active frontages New public space Public space reserved for historic and traditional uses Shared green open space Water front red/green Existing mature trees retained Existing Class 1 building Land to offer permission to be acquired Proposed pedestrian and cycle routes through site Secondary pedestrian and cycle routes through site Active frontage
MM737	147	Site 14	Delete site allocation
MM738	150	Site 16	<p>Amend illustrative diagram as follows; Site 16 College Road West</p>  <p>16 College Road West</p> <p>Key</p> <ul style="list-style-type: none"> Site boundary Key public routes to be upgraded Mixed use office with active frontages (as indicated) Improved public realm Approved scheme Improved crossing between Kymburley Road and Bradstone House New bus standing area as part of bus station upgrade
MM739	157	Site 18	<p>Amend illustrative diagram as follows; Site 18 19-51 College Road</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p style="text-align: right;">19-51 College Road</p>  <p style="text-align: right;">Key --- Site boundary</p>
MM740	170	Site 23	<p><i>Amend illustrative diagram as follows;</i> Site 23 Gayton Road</p>  <p style="text-align: right;">23 Gayton Road</p> <p style="text-align: right;">Key</p> <ul style="list-style-type: none"> --- Site boundary ■ Housing ■ Mixed use with active frontages (as indicated) ■ Improved footway and new public space ■ New green space → Key pedestrian routes and access through site --- Secondary pedestrian routes (aspirational) ■ Active frontage
MM741	185	Indicator SR3	<p><i>Amend target to read; <u>90% by unit numbers and trigger to read; 85% by unit numbers</u></i></p>

