

View results

Respondent

74

Anonymous

03:59

Time to complete

Part A - Personal Details

We will not be able to accept responses where personal details are not provided.

1. Are you submitting this representation as an individual or on behalf of an organisation? *

- Individual
- Organisation

2. Title

Mr

3. First Name *

Damien

4. Last Name *

Lynch

5. Job Title (where relevant)

Associate Director

6. Organisation (where relevant)

Planning Issues

7. Address Line 1

8. Address Line 2

9. Address Line 3

10. Address Line 4

11. Post Code

12. Telephone Number

13. Email Address *

Part B - Your Representation(s)

To which part of the Local Plan does this representation relate? (Please make one representation at a time, you can click to make a further representation - up to a maximum of 10 per form - at the end of this section).

14. To which policy does your representation relate? *

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

15. Do you consider this policy sound?

- Yes
- No

16. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Strategic Policy 03: Meeting Harrow's Housing Needs

We support this draft policy which supports the delivery of at least 980 units of specialist older person accommodation, comprising retirement housing units extra care housing units between 2022- 32. However, we would observe that this is a significant number of older persons housing and that the delivery of older persons housing over the preceding 10-year period has been nowhere near this level with only a handful of developments coming forward over that period.

The 2022 Housing LIN needs survey suggests that at 2022, the existing supply of housing for older people and housing with care was just 1,845 units, some of which was delivered as part of local authority programmes over 50 years ago. This suggests that despite the clear and acknowledged demand for such housing, providers are finding it difficult to secure and bring forward such developments in the area. This may be due to the local land market but clearly, policy restrictions also play a part. The delivery of 980 additional units within this typology will require a step change in delivery and a flexible policy approach by the council. We consider that without a flexible approach, the delivery of this critical housing typology will remain constrained.

We recommend that criteria C of this policy is amended to state include the following additional text:

The council recognises past levels of undersupply in this typology and the critical need for such housing in Harrow. As such, the application of infrastructure, affordable housing and other policies required elsewhere in the plan will be applied flexibility to housing for older person proposals recognising the viability constraints for this typology as established within the council's viability evidence base.

17. Would you like to make another representaiton?

- Yes
- No

Part B - Your Representation(s) (2)

To which part of the Local Plan does this representation relate?

18. To which policy does your representation relate? *

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

19. Do you consider this policy sound?

- Yes
- No

20. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy H01: Dwelling size mix

We recommend that this policy acknowledges that specialist housing for older people developments will deliver smaller unit sizes to enable older people to downsize and release larger underoccupied housing stock for families.

We recommend that criteria C (6) of this policy is amended to state include the following additional text:

It is recognised that specialist housing for older people will typically include mostly smaller unit sizes and the council will therefore assess such applications on a case by case basis and this policy will be applied flexibility to such proposals.

21. Would you like to make another representaion?

- Yes
- No

Part B - Your Representation(s) (3)

To which part of the Local Plan does this representation relate?

22. To which policy does your representation relate? *

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

23. Do you consider this policy sound?

- Yes
- No

24. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy HO3: Optimising the use of small housing sites
We support the above policy given that housing for older people proposals are capable of achieving high density development on relatively small sites.

25. Would you like to make another representaion?

- Yes
- No

Part B - Your Representation(s) (4)

To which part of the Local Plan does this representation relate?

26. To which policy does your representation relate? *

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

27. Do you consider this policy sound?

- Yes
- No

28. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy HO4: Genuinely Affordable housing
In line with the NPPG Viability section, we would encourage the council to create a bespoke affordable housing policy in respect of housing for older people development. This policy should recognise that such proposals have different viability characteristics and are managed in different ways to mainstream housing development. The typology often proposes less than 40 dwellings, viability nearly also constrains the viable affordable housing percentage at less than 10% affordable housing meaning that on site delivery is not practicable. Even if 35% affordable housing was viable, in our experience, no registered provider is willing to manage units within a small mixed tenure, age restricted development due to the relatively high service charges associated with the communal areas and lodge manager requirements.
Other local authorities such as Fareham, Birmingham, Charnwood, BCP and Swale have applied full exemptions from affordable housing requirements in light of their viability testing showing that it would be unviable to require affordable housing from such proposals as well as the critical need for such housing. In this case, the council's plan wide viability clearly shows that the full 35% affordable housing requirement is not viable.
Furthermore, the council commission Housing LIN to undertake a housing needs assessment in 2022 which concluded that the housing needs for older persons housing is different to mainstream housing with 20% of identified need for affordable housing (rented). There is a current identified imbalance of tenures with most of the existing supply in the affordable housing sector.
We recommend that criteria Q is added to this policy to include the following additional text:
It is recognised that specialist housing for older people will require flexibility in the application of policy requirements due to the nature of such developments. The plan wide viability study acknowledges that older person's housing development has different viability characteristics and may not support 35% affordable housing. This policy will be applied flexibly in relation to affordable housing targets, tenure and commuted sum payments for older persons housing proposals. It is acknowledged that mixed tenure management on such proposals may not be feasible and therefore the council will work with providers of such housing to ensure proposals may come forward.
Criteria N d. in relation to vacant building credit should be deleted as it is not consistent with national policy.

29. Would you like to make another representaiton?

- Yes
- No

Part B - Your Representation(s) (5)

To which part of the Local Plan does this representation relate?

30. To which policy does your representation relate? *

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

31. Do you consider this policy sound?

- Yes
- No

32. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy HO4: Genuinely Affordable housing

In line with the NPPG Viability section, we would encourage the council to create a bespoke affordable housing policy in respect of housing for older people development. This policy should recognise that such proposals have different viability characteristics and are managed in different ways to mainstream housing development. The typology often proposes less than 40 dwellings, viability nearly also constrains the viable affordable housing percentage at less than 10% affordable housing meaning that on site delivery is not practicable. Even if 35% affordable housing was viable, in our experience, no registered provider is willing to manage units within a small mixed tenure, age restricted development due to the relatively high service charges associated with the communal areas and lodge manager requirements.

Other local authorities such as Fareham, Birmingham, Charnwood, BCP and Swale have applied full exemptions from affordable housing requirements in light of their viability testing showing that it would be unviable to require affordable housing from such proposals as well as the critical need for such housing. In this case, the council's plan wide viability clearly shows that the full 35% affordable housing requirement is not viable.

Furthermore, the council commission Housing LIN to undertake a housing needs assessment in 2022 which concluded that the housing needs for older persons housing is different to mainstream housing with 20% of identified need for affordable housing (rented). There is a current identified imbalance of tenures with most of the existing supply in the affordable housing sector.

We recommend that criteria Q is added to this policy to include the following additional text:

It is recognised that specialist housing for older people will require flexibility in the application of policy requirements due to the nature of such developments. The plan wide viability study acknowledges that older person's housing development has different viability characteristics and may not support 35% affordable housing. This policy will be applied flexibly in relation to affordable housing targets, tenure and commuted sum payments for older persons housing proposals. It is acknowledged that mixed tenure management on such proposals may not be feasible and therefore the council will work with providers of such housing to ensure proposals may come forward.

Criteria N d. in relation to vacant building credit should be deleted as it is not consistent with national policy.

33. Would you like to make another representaiton?

- Yes
- No

Part B - Your Representation(s) (6)

To which part of the Local Plan does this representation relate?

34. To which policy does your representation relate? *

- Strategic Policy 01: High Quality Growth
- Policy GR1: Achieving a High Standard of Development
- Policy GR2: Inclusive Neighbourhoods
- Policy GR3: Public Realm and Connecting Places
- Policy GR3A: Inclusive Design (New)
- Policy GR3B: Safety, Security and Resilience to Hazards (New)
- Policy GR4: Building Heights
- Policy GR4A: Basement Development (New)
- Policy GR5: View Management
- Policy GR6: Areas of Special Character
- Policy GR7: External Lighting
- Policy GR8: Shopfronts & Forecourts
- Policy GR9: Outdoor Advertisements, digital displays and hoardings
- Policy GR10: Infill and backland sites, back gardens and amenity areas
- Policy GR11: Planning Obligations
- Policy GR12: Site Allocations (New)
- Strategic Policy 02: Harrow's Historic Environment
- Policy HE1: Historic Environment
- Policy HE2: Enabling Development
- Strategic Policy 03: Meeting Harrow's Housing Needs
- Policy HO1: Dwelling size mix
- Policy HO2: Conversion and redevelopment of dwellings
- Policy HO3: Optimising the use of small housing sites
- Policy HO4: Genuinely Affordable Housing
- Policy HO5: Housing estate renewal and regeneration
- Policy HO6: Accommodation for older people
- Policy HO7: Supported and Sheltered Housing
- Policy HO8: Purpose-built student accommodation
- Policy HO9: Large scale purpose built and conversions for shared living
- Policy HO10: Housing with shared facilities (Houses in Multiple Occupation)

- Policy HO11: Self-build and Custom build housing
- Policy HO12: Gypsy and Traveller Accommodation Needs
- Strategic Policy 04: Local Economy
- Strategic Policy 05: Harrow & Wealdstone Opportunity Area
- Policy LE1: Development Principles & Town Centre Hierarchy
- Policy LE2: Night-time and Evening Economy
- Policy LE3: Industrial Land
- Policy LE4: Culture and Creative Industries
- Policy LE5: Tourism and Visitor Accommodation
- Strategic Policy 06: Social and Community Infrastructure
- Policy CI1: Safeguarding and Securing Social Infrastructure
- Policy CI2: Play and Informal Leisure
- Policy CI3: Sport and Recreation
- Policy CI4: Digital and Communications Infrastructure
- Strategic Policy 07: Green Infrastructure
- Policy GI1: Green Belt and Metropolitan Open Land
- Policy GI2: Open Space
- Policy GI3: Biodiversity
- Policy GI4: Urban Greening, Landscaping and Trees
- Policy GI5: Food Growing
- Strategic Policy 08: Responding to the Climate and Nature Emergency
- Policy CN1: Sustainable Design and Retrofitting
- Policy CN2: Energy Infrastructure
- Policy CN3: Reducing Flood Risk
- Policy CN4: Sustainable Drainage
- Policy CN5: Waterway Management
- Strategic Policy 09: Managing Waster and Supporting the Circular Economy
- Policy CE1: Reducing and Managing Waste
- Policy CE2: Design to support the Circular Economy
- Strategic Policy 10: Movement
- Policy M1: Sustainable Transport

- Policy M2: Parking
- Policy M3: Deliveries, Servicing and Construction
- Other

35. Do you consider this policy sound?

- Yes
- No

36. Please give details of why you consider this policy to be sound or not sound and set out the modification(s) you consider necessary to make the policy sound that you have identified (if any).

Policy CN1: Sustainable Design and Retrofitting and Policy CN2: Energy Infrastructure
As noted above, the viability of housing for older people is noted to be less viable than mainstream housing. Proposed amendments to Policy HO6 above would ensure that the council might assess proposals for older persons housing on a site-by-site basis, applying a flexible approach to these requirements.

37. Would you like to make another representaion?

- Yes
- No

Part C - Demographics

London Borough of Harrow has a legal responsibility to promote and advance equality. To help us to do this, it is important that we have a good understanding of our communities, how our services are being accessed and who is using or would like to use our services. With up-to-date and accurate information we are able to: Better understand our service users / residents and shape services to meet their specific needs, Identify and address any barriers / issues individuals may experience when accessing our services (including information about our services), Ensure our policies and services are accessible to everyone who uses them.
The information will also enable us to monitor our progress with regards to addressing inequality and allow our employees and service users see how we are performing on equality.

Data Protection: It is your choice whether you provide this information. Your replies will not be used in a way that identifies you.

