

Overview and Scrutiny Committee

AGENDA

DATE: Wednesday 9 February 2011

TIME: 6.30 pm

VENUE: Committee Rooms 1&2
Harrow Civic Centre

MEMBERSHIP (Quorum 4)

Chairman: Councillor Jerry Miles

Councillors:

Sue Anderson
Ann Gate
Bill Phillips
Sachin Shah

Kam Chana
Barry Macleod-Cullinane
Paul Osborn (VC)
Stephen Wright

Representatives of Voluntary Aided Sector: Mrs J Rammelt/Reverend P Reece
Representatives of Parent Governors: 2 Vacancies

(Note: Where there is a matter relating to the Council's education functions, the "church" and parent governor representatives have attendance, speaking and voting rights. They are entitled to speak but not vote on any other matter.)

Reserve Members:

1. Nana Asante
2. Varsha Parmar
3. Krishna Suresh
4. Sasi Suresh
5. Krishna James

1. Stanley Sheinwald
2. Mark Versallion
3. Christine Bednell
4. Susan Hall

Contact: Alison Atherton, Senior Professional - Democratic Services
Tel: 020 8424 1266 E-mail: alison.atherton@harrow.gov.uk

AGENDA - PART I

1. ATTENDANCE BY RESERVE MEMBERS

To note the attendance at this meeting of any duly appointed Reserve Members.

Reserve Members may attend meetings:-

- (i) to take the place of an ordinary Member for whom they are a reserve;
- (ii) where the ordinary Member will be absent for the whole of the meeting; and
- (iii) the meeting notes at the start of the meeting at the item 'Reserves' that the Reserve Member is or will be attending as a reserve;
- (iv) if a Reserve Member whose intention to attend has been noted arrives after the commencement of the meeting, then that Reserve Member can only act as a Member from the start of the next item of business on the agenda after his/her arrival.

2. DECLARATIONS OF INTEREST

To receive declarations of personal or prejudicial interests, arising from business to be transacted at this meeting, from:

- (a) all Members of the Committee, Sub Committee, Panel or Forum;
- (b) all other Members present in any part of the room or chamber.

3. MINUTES (Pages 1 - 16)

That the minutes of the meeting held on 23 November 2010 and of the special meeting held on 12 January 2011 be taken as read and signed as correct records.

4. PUBLIC QUESTIONS

To receive questions (if any) from local residents/organisations under the provisions of Committee Procedure Rule 17 (Part 4B of the Constitution).

5. PETITIONS

To receive petitions (if any) submitted by members of the public/Councillors under the provisions of Committee Procedure Rule 15 (Part 4B of the Constitution).

6. DEPUTATIONS

To receive deputations (if any) under the provisions of Committee Procedure Rule 16 (Part 4B) of the Constitution.

7. REFERENCES FROM COUNCIL/CABINET

- (a) Capital Programme: (Pages 17 - 18)

Reference from the Cabinet meeting held on 15 December 2010.

- (b) Feedback on the Budget: (To Follow)

Reference from Cabinet

8. HEALTH SCRUTINY SUB-COMMITTEE - TERMS OF REFERENCE (Pages 19 - 22)

Recommendation from the Health Scrutiny Sub-Committee meeting held on 7 December 2010.

9. CHANGES IN THE MEMBERSHIPS OF THE HEALTH SUB-COMMITTEE AND THE PERFORMANCE AND FINANCE SCRUTINY SUB-COMMITTEE

To effect the following changes in the memberships of the Sub-Committees, of which notice has been given by the Majority Group:

(a) that Councillor Varsha Parma replace Councillor Sachin Shah on the Performance and Finance Scrutiny Sub-Committee; and

(b) that Councillor Sachin Shah replace Councillor Varsha Parma on the Health Sub-Committee.

10. CORE STRATEGY - PROPOSED SUBMISSION VERSION (Pages 23 - 186)

Report of the Corporate Director of Place Shaping

11. CORPORATE PLAN (To Follow)

Report of the Divisional Director of Partnership Development and Performance

12. SINGLE EQUALITIES SCHEME (Pages 187 - 282)

Report of the Corporate Director of Adults and Housing and the Assistant Chief Executive

13. BETTER DEAL FOR RESIDENTS STANDING REVIEW SCOPE (Pages 283 - 288)

Report of the Divisional Director of Partnership Development and Performance

14. SCRUTINY WORK PROGRAMME UPDATE (Pages 289 - 294)

Report of the Divisional Director of Partnership Development and Performance

15. ANY OTHER BUSINESS

Which the Chairman has decided is urgent and cannot otherwise be dealt with.

AGENDA - PART II

Nil

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OVERVIEW AND SCRUTINY COMMITTEE MINUTES

23 NOVEMBER 2010

Chairman: * Councillor Jerry Miles

Councillors:

* Sue Anderson	* Paul Osborn
* Ann Gate	* Bill Phillips
* Susan Hall (4)	* Sachin Shah
* Barry Macleod-Cullinane	* Stephen Wright

Voting (Voluntary Aided) (Parent Governors)
Co-opted: † Mrs J Rammelt (Vacancy)
Reverend P Reece (Vacancy)

* Denotes Member present
(4) Denotes category of Reserve Members
† Denotes apologies received

70. Attendance by Reserve Members

RESOLVED: To note the attendance at this meeting of the following duly appointed Reserve Member:-

Ordinary Member

Councillor Kam Chana

Reserve Member

Councillor Susan Hall

71. Declarations of Interest

RESOLVED: To note that the following interests were declared:

Agenda item 7a – Neighbourhood Champions – Response to Scrutiny Challenge Panel Report

Councillor Sue Anderson declared a personal interest in that she had undertaken the Neighbourhood Champion training that day. She would remain in the room whilst this matter was considered and voted upon.

Councillor Susan Hall declared a prejudicial interest in that she had been a Cabinet Member under the previous administration and had introduced the Neighbourhood Champions Scheme. She would leave the room whilst this matter was considered and voted upon.

Councillor Barry Macleod-Cullinane declared a prejudicial interest in that he had been a Cabinet Member under the previous administration and had voted in favour of the Neighbourhood Champions Scheme. He would leave the room whilst this matter was considered and voted upon.

Councillor Chris Mote, who was not a member of the Committee, declared a prejudicial interest in that he had been a Cabinet Member under the previous administration and had voted in favour of the Neighbourhood Champions Scheme. He would leave the room whilst this matter was considered and voted upon.

Councillor Paul Osborn declared a prejudicial interest in that he had been a Cabinet Member under the previous administration and had voted in favour of the Neighbourhood Champions Scheme. He would leave the room whilst this matter was considered and voted upon.

Councillor Bill Phillips declared a personal interest in that he had delivered the Neighbourhood Champion training and his wife was a Neighbourhood Champion. He would remain in the room whilst this matter was considered and voted upon.

Councillor Sachin Shah declared a personal interest in that he was a Neighbourhood Champion. He would remain in the room whilst this matter was considered and voted upon.

Councillor Stephen Wright declared a personal interest in that he had undertaken the Neighbourhood Champion training. He would remain in the room whilst this matter was considered and voted upon.

Agenda Item 8 – Implications of the Comprehensive Spending Review

During the discussion on this item, Councillor Sue Anderson declared a personal interest in that she worked part time for Harrow Primary Care Trust. She would remain in the room whilst this matter was considered and voted upon.

Agenda Item 10 – Report from the Scrutiny Lead Members

Councillor Ann Gate declared a personal interest in that her husband was a trustee of Harrow Association of Voluntary Services (HAVS). She would remain in the room whilst this matter was considered and voted upon.

Councillor Bill Phillips declared a personal interest in that he was a trustee of HAVS. He would remain in the room whilst this matter was considered and voted upon.

72. Minutes

RESOLVED: That the minutes of the meeting held on 2 November 2010 be taken as read and signed as a correct record, subject to the following amendment:

- Minute 69 – The Business Transformation Partnership – last sentence of paragraph 5 be changed to read “If the implementation of such LEAN champions was successful the aim would be to increase the number of staff members with such skills”.

73. Public Questions, Petitions and Deputations

RESOLVED: To note that no public questions were put, or petitions or deputations received at this meeting under the provisions of Committee Procedure Rules 17, 15 and 16 (Part 4B of the Constitution) respectively.

RESOLVED ITEMS

74. Neighbourhood Champions - Response to Scrutiny Challenge Panel Report

The Committee received a reference from the Cabinet meeting held on 18 October 2010 which was in response to the Scrutiny Challenge Panel report on Neighbourhood Champions. The Chairman advised that the Portfolio Holder for Environment and Community Safety had submitted his apologies as he had a prior engagement.

In considering the response from the Corporate Director of Community and Environment contained within his report to Cabinet, Members commented and raised a number of issues as follows:

- the response to recommendation 4 was a little ambiguous in terms of timescales and a Member questioned the thinking behind this response;
- there was a significant issue in that the police were taking their responsibility of protecting the identity of the neighbourhood champions to the extent that it could cause the scheme to fail. A Member stated that ward councillors were keen that there should be a proper

connection between themselves and the neighbourhood champions. The increased isolation of the champions would hinder the relationship;

- in terms of the Panel's fifth recommendation, a Member questioned why Phase 2 would not take place. An officer advised that this was in relation to child protection issues and that she would circulate the relevant report to the Member;
- a Member questioned the response to recommendation 9. An officer advised that any concerns should be referred to the Safer and Stronger Community Scrutiny leads. They could then raise those concerns with the relevant Director who could then, in turn, raise them with the Borough Commander. This suggestion was welcomed by Members;
- a Member questioned why recommendation 10 had not been agreed. There was no reason for this decision in the Corporate Director's report. Another Member added that without such a flagging process there was the likelihood that a number of people would report the same incident.

RESOLVED: That the response of Cabinet to the recommendations of the Neighbourhood Champions Scrutiny Challenge Panel be noted.

75. Implications of the Comprehensive Spending Review

The Chairman welcomed the Corporate Director of Finance to the meeting in order to make an oral report on the implications of the Comprehensive Spending Review (CSR).

The Corporate Director of Finance reported that the Local Government Settlement was currently awaited and was expected in the week commencing 6 December 2010. This was close to the publication date for the December Cabinet papers and there were likely to be timing issues in terms of the information available to submit to that meeting.

In making her oral report, the Corporate Director of Finance clarified, in so far as was possible given the information available and current uncertainty, the implications for the Council and other issues as follows:

- the Department for Communities and Local Government had fared relatively badly compared to other government departments;
- there would be a 28% reduction in local government funding in a 4 year period;
- there was currently a funding gap of £16m;
- the cash position was unknown;
- it was expected that cuts would be front loaded;

- the Council would receive equivalent funding from government in order to deliver a 0% Council Tax increase in 2012;
- in terms of specific grants, the assumption had been made that a service would be scaled back in line with grants but more work was required on this area;
- there would be additional funding for Adults and Childrens' Services and most specific grants related to these two services;
- some budget ring-fences may be removed;
- it was unknown whether some grants would be protected;
- there would continue to be reform to the Housing Revenue Account;
- there was likely to be significant changes to the benefits system, including measures to cap the total amount of housing benefit payable. The White Paper on benefits also indicated that Council Tax Benefit would become a local responsibility by 2013/14 and would be subject to a 10% cut;
- there would be big reductions in capital funding which would be of particular significance in relation to schools;
- the police and fire services would be subject to cuts but it was likely that these would be loaded in later years.
- The Council would still be required to contribute to the Carbon Reduction Scheme but would not receive any redistributed funding back.

Members asked questions, sought clarification and challenged assumptions and, in response, the Corporate Director offered clarification as follows:

- despite the best effort of officers to get a head start in the budget and associated consultation processes, this had always proved difficult. Attention tended to focus on the coming year rather than years 2 and 3. Officers had tried to do a thorough review via the Better Deal for Residents programme;
- she was not able to forecast the outcome of the consultation in relation to social care and the decision on who would receive Freedom Passes would be a political one;
- the assumption that would be fed in to the December Cabinet report was that there would be a 10% reduction in the 3 types of grant support. Compared to previous assumptions, the most difficult area would be specific grants;

- a re-calculation of the funding gap based on the new assumptions that the Council would receive assistance in maintaining a 0% Council tax increase and receive an additional £1m in relation to Adults and Children Services would be circulated to Members;
- there was, so far as she was aware, no guidance in terms of a likely capping level in relation to Council Tax;
- it was a reasonable expectation that the report submitted to Cabinet in December be detailed but, due to timings, it was likely that some clarification in relation to the tax base and settlement would be required. The draft report was being prepared and if the settlement information was not received in time for the Cabinet report publication, draft estimates would be included and then updated. The Corporate Director added that officers were planning for the worse case scenario;
- in terms of progress on the Medium Term Financial Strategy, if it were to be front loaded, the situation in years 2, 3 and 4 would be improved. The transformation programme had generated savings of £25m and the expectation was that the end of year 2 position would look quite healthy;
- in terms of the viability issue in relation to the Housing Revenue Account (HRA) raised by a Member and his comment that tenants and leaseholders appeared to be subsidising maintenance of estates, the Corporate Director advised that there was a planned reduction of the HRA and that it was not possible to draw down from balances indefinitely. Tenants and Leaseholders would be consulted on the draft budget. She added that whether or not to charge freeholders for the services they received would be a political decision;
- it was expected that less than 100 households would be affected by the £400 per week cap in terms of housing benefit but she would check the figures and advise Members accordingly;
- the additional costs arising from the IT outsourcing were factored into the current analysis of the £16m funding gap. Whilst the funding gap changed all the time, the final price for the IT contract was close to that reported to Cabinet and Council;
- in terms of the Primary Care Trust's (PCT) £30m overspend, the transfer of additional responsibility of public health to the Council and whether any contingency had been included or liability on the Council, the Corporate Director advised there had been a meeting to discuss funding issues. The PCT's problems were cause for concern. Responsibility for clients had been discussed, agreed and signed off in writing a couple of months previous. She did, however, remain concerned about risk. There was £125,000 contingency;
- from an officer point of view, there was considerable lobbying and also via London Councils, Local Government Association and London

Treasurers. There were strong views about the 'floor' level as 29 London Boroughs were below this. There was a general concern across London that funding would be moved to more rural areas. She added that Harrow did not have the capacity to respond to all consultations which was why a subscription was paid to London Councils to respond;

- there was considerable joint activity with other boroughs, in particular in relation to joint procurement, for example, resourcing project, occupational health, trading standards and adults services. Officers had investigated the opportunities for a shared service. A number of boroughs were trying to amalgamate management teams;
- Members would be provided with background templates to the budget proposals in December. If Members wished to meet with Corporate Directors to discuss a particular service area that could be arranged. She undertook to discuss, with the Administration, the Member's point that it would be helpful to Members to know what options were considered in formulating the recommendations as it would otherwise be difficult to determine whether a sensible option had been chosen. She reminded Members that officers were often somewhat constrained in terms of options;
- there was a risk that property searches may reduce;
- deliberations were required as to whether the New Homes bonus should be included in draft budget so that it was relied upon or whether to treat it as a windfall. The Corporate Director agreed that the Member's proposal to include the social housing element was helpful.

The Chairman thanked the Corporate Director of Finance for her attendance and oral report. He also thanked Members for their questions and contributions.

RESOLVED: That the oral report of the Corporate Director of Finance be noted.

76. Project Scope - Local Performance Management Framework

The Committee received a report of the Divisional Director of Partnership, Development and Performance which set out the draft scope for a review to examine the Council's use of performance information.

In considering the draft scope, Members made a number of comments and sought clarification as follows:

- a Member suggested that a version number or version history be included so that it was clear whether it was an original or revised scope that was being presented to Members. An officer undertook to take this suggestion on board;

- at a scoping meeting, there had been a comment that other, higher performing, boroughs spent more than Harrow and a Member suggested that perhaps a borough that spent a similar amount but that was also a high performer should be included in the methodology;
- if Councils spent more, it may lead to better performance but that anything that Harrow spent should be with a view to saving money. A Member questioned whether the current performance framework provided value for money;
- in terms of resource commitment, the review should be properly resourced in terms of officer time. The scope should state how much time the review would take if it was properly resourced. An officer advised that the scope clarified the resource from within the team which was available and this would be balanced against the projects being undertaken – it was difficult to be any more specific. She also advised that there was no additional support other the 3.5 scrutiny officer posts although, on occasion when the team engaged with a service, support was forthcoming from within the service itself. Another Member added that there needed to be a greater awareness of the scrutiny team’s workload and, as such, this should be discussed at meetings of the scrutiny leadership group.

RESOLVED: That the Project Scope of the Local Performance Management Framework Review be approved.

77. Report from the Scrutiny Lead Members

The Committee received a report of the Divisional Director of Partnership, Development and Performance which provided information on the issues discussed in, and recommendations from, the scrutiny lead member briefings for Corporate Effectiveness, Safer and Stronger Communities and Sustainable Development and Enterprise.

RESOLVED: That

- (1) the discussions held by the lead members be noted;
- (2) the relevant actions proposed in the report be agreed.

(Note: The meeting, having commenced at 7.30 pm, closed at 9.07 pm).

(Signed) COUNCILLOR JERRY MILES
Chairman

OVERVIEW AND SCRUTINY COMMITTEE (SPECIAL)

MINUTES

12 JANUARY 2011

Chairman:	* Councillor Jerry Miles	
Councillors:	* Ann Gate * Susan Hall (4) * Barry Macleod-Cullinane * Paul Osborn	* Varsha Parmar (2) * Krishna Suresh (3) * Sasi Suresh (4) * Stephen Wright
Voting	(Voluntary Aided)	(Parent Governors)
Co-opted:	† Mrs J Rammelt Reverend P Reece	(Vacancy) (Vacancy)

- * Denotes Member present
(2), (3) and (4) Denote category of Reserve Members
† Denotes apologies received

78. Attendance by Reserve Members

RESOLVED: To note the attendance at this meeting of the following duly appointed Reserve Members:-

Ordinary Member

Councillor Sue Anderson
Councillor Bill Phillips
Councillor Sachin Shah

Reserve Member

Councillor Krishna Suresh
Councillor Sasi Suresh
Councillor Varsha Parmar

79. Declarations of Interest

RESOLVED: To note that the following interests were declared:

Agenda Item 4 – Question and Answer Session with the Leader of the Council and Chief Executive

Councillor Barry Macleod-Cullinane declared personal interests in that he was an employee of London Councils Ltd and his sister, a teacher at Hatch End High School, was an employee of Harrow Council. He would remain in the room whilst the matter was considered and voted upon. If his interests became prejudicial he would leave the room.

Councillor Paul Osborn declared a personal interest in that during the Transformation Programme he had received hospitality from Capita. He would remain in the room whilst the matter was considered and voted upon.

Councillor Chris Mote, who was not a member of the Committee, declared a personal interest in that his sister, a teacher at Marlborough School, was an employee of Harrow Council. He would remain in the room whilst the matter was considered and voted upon.

80. Deputations

RESOLVED: To note that no deputations were received at this meeting under the provisions of Committee Procedure Rule 16 (Part 4B of the Constitution).

RESOLVED ITEMS**81. Question and Answer Session with the Leader of the Council and Chief Executive**

The Chairman welcomed the Leader of the Council, the Chief Executive and Corporate Director of Finance to the meeting, which would concentrate on the Council's Budget and priorities. He indicated that Members should refer to the Cabinet report of 15 December 2010 and outlined the timings for individual Members to ask their questions. He also drew attention to a tabled list of questions prepared by the Scrutiny Leadership Group. The Chairman advised that these questions would form the basis of the meeting and that any questions asked outside of these areas might not be answered as fully.

The Corporate Director of Finance and Leader of the Council explained the background to the draft budget and outlined developments since the December Cabinet report had been produced. They also reported on the issues facing the Council.

Members asked a series of questions, challenged responses received and the availability of information to Members.

Question: How has the Government grant changed this year?

The Corporate Director of Finance reported that the Council had previously received support in 3 different ways. Under the old system, the Council had received Formula Grant (£67m), Area Based Grants (£30m) and Specific Grants (£30m). Specific Grants were ring fenced grants mainly in the areas of adult and children's services. Within the settlement, money from the Area Based grants had moved to the Formula Grant and some Specific Grant areas had moved to the Early Intervention Grants.

The Corporate Director reported that under the new system, the Council would receive £78m Formula Grant, which would reduce to £70m. It would receive £17.5m Specific Grant but some of this would be moved to the Dedicated Schools Grant. There remained one or two grants to be announced. She explained that part of the difficulty in preparing the budget had been determining baseline figures as well as the uncertainty in relation to the £2.6m health improvement grant which had been paid directly to the Primary Care Trusts (PCT). It remained unclear as to whether or not this money would be available to support existing activity.

Question: What are the results of "Let's Talk", how have these influenced the Council's thinking and what impact are they having on the budget?

The Leader of the Council reported that 1,500 surveys had been received and that the Council was working to establish a new relationship with residents. The draft priorities had received strong support. He added that difficult decisions would need to be made and that more analysis of the results was required prior to inclusion in the budget.

Question: In terms of the provision for inflation in the budget, has the Leader of the Council read the Bank of England's inflation report?

The Corporate Director of Finance acknowledged that a 2% provision for inflation was less than the current Consumer and Retail Price Indices. She explained that the purpose was to effectively enforce efficiency savings on departments. She added that other boroughs were taking a similar line whilst some made no provision for inflation.

Question: What is the value of procurement savings required?

The Corporate Director of Finance advised an estimated total saving of £2m with a net figure of £1.5m. Officers were being cautious in their approach and that there were 3 parts to the plan; commercial skill/negotiation, compliance with systems and end to end procurement. A detailed analysis of the categories was being undertaken.

In response to a challenge by a Member, the Chief Executive stated that the assumptions that underpinned the budget were sensitive and he assured the Member that he had also challenged those assumptions. In terms of procurement, there was evidence to suggest that there were significant

potential savings that could be achieved by buying from accredited suppliers, approaching the Council's top 50 suppliers to see if an improved price could be gained and, finally, through category management.

Question: Can you explain the increase in the Mayor's budget?

The Corporate Director of Finance advised that this budget had been out of kilter and that the increase was a correction to an imbalance. The Leader of the Council added that the ceremonial activities carried out by the Mayor brought communities together.

A Member challenged this response indicating that it was not right or proper that this budget should be increased, referring to extravagance, overtime and the increased costs incurred by attending out of borough events.

Question: Can you explain the PCT costs and funding?

The Corporate Director of Finance reported that the budget settlement had included an additional £2.6m funding to support health and re-enablement. Officers were trying to establish if this funding would support the Council's budget or have to be spent on activities not currently being done. Officers were in regular discussion with the PCT and it was likely that this funding would support the PCT in terms of hospital admissions. She added that the majority of other London Boroughs had assumed that this funding would not support their Council's budget.

The Member expressed concern at the financial situation of the PCT and the possibility that their financial deficit could be passed to the Council. There was nothing in the draft budget in relation to contingency around the PCT and he referred to the intervention made by Chief Executive at the last meeting of the Harrow Strategic Partnership.

In response, the Chief Executive advised that there was an acute problem in terms of Health in Harrow and that he had discussed this matter with Ruth Carnall, Chief Executive of NHS London. She had indicated that PCTs could not use the additional £2.6m for health improvement in relation to their deficits. With this in mind, the Chief Executive had started discussions with the PCT and he advised that he hoped to have a report from them in 5-6 weeks.

Question: In relation to page 19 of the Cabinet report, why was there no investment in older people and mental health?

The Corporate Director of Finance reported that the growth pressures put forward by Adult Services were supported by their analysis of demographic trends. The Member challenged the response, indicating that prevention would drive down costs.

Question: Is the Trading Standards Services coming in-house?

The Leader of the Council advised that there were 2 alternatives, either of which would save £200,000. There were on-going discussions with Brent. In

response, the Member emphasised the need to give Brent notice if the service was to move in-house and stated that the report was misleading.

Question: Can you confirm that we will not reduce funding for the town centre police?

The Leader of the Council indicated that he could not give such an undertaking and that discussions with the police were taking place. The contract was currently being looked at.

Question: Following on from the previous question, what is the impact of the budget proposals on teenagers?

The Leader of the Council advised that specific grants for this area had been cut. There was, however, a strategy for early intervention.

The Member sought clarification that early intervention related to the teenage population as prevention was key. The Leader indicated that particular groups would be targeted but that the work could not be done on the same scale. The Chief Executive added there needed to be a focus on prevention and better targeting of resources. There would also be discussions with the Youth Parliament to seek their views as to how resources should be used.

Question: What is the impact of the cuts in the police budget?

The Leader of the Council stated that co-location with the police could save money. The Chief Executive advised that there was a need to look at the impact on communities due to some of the potential ramifications from the issues around the previous question. There were issues in relation to joining up police and Council support services and whether there was further scope to pool resources.

Question: What is the financial impact on the Council of the Magistrates' Court closure, such as increased travel costs to other sites?

The Leader of the Council stated that there had been a scrutiny report on this matter which had identified an additional £80,000 cost. The Divisional Director of Collections and Housing Benefits was reviewing the budget to identify an additional impact.

Question: Referring to pages 24 and 25 of the budget report, Gayton Library premises costs and Local Development Framework investment seem to balance each other out. Is this a coincidence?

The Corporate Director of Finance reported that there was a one off saving in 2011/12 of £185,000 in relation to the library and that the additional staff resource for the LDF was only required for a year.

Question: In relation to investment in IT, £1.6m is included in 2011/12 but nothing in subsequent years. Why?

The Corporate Director of Finance reported that the cost of the contract varied each year and that this would be set out in report to Cabinet in February.

The Member questioned the reductions in buildings referred to in the report to Cabinet in September. The Corporate Director advised that some savings would arise through mobile and flexible working but that the business case was still being worked on.

Question: What is the impact on children's services areas where there is a 50:50 funding and this has been taken away?

The Leader of the Council advised that there was little impact as there few such arrangements.

Question: Your manifesto states that you will defend Safer Neighbourhood teams but you have said that you are reviewing the Town Centre policing. Why?

The Leader of the Council responded that the administration would defend the Safer Neighbourhood teams and there were discussions on-going with the police. There would be difficult decisions to make, some of which would depend on the Mayor for London.

Question: Referring to page 21 of the budget report, can you outline the proposal for the rationalisation of buildings?

The Leader of the Council advised that a report would be submitted to Cabinet in March.

Question: Over a couple of years, the Chief Executive has stated that there has been enough of salami slicing. Leader, have you been offered large scale cuts and what are you going to cut out of the 700 services that will make a difference?

The Leader of the Council stated that a balanced budget would be possible but that there would be severe cuts.

The Member challenged this response stating that £660,000 already identified as a saving in public realm would destroy front line services. The Leader responded that whilst savings were being made in public realm, in many ways services were being enhanced.

Question: At the Major Developments Panel on 6 January 2011, Members were presented with a report on the cost of the LDF in 2012/13 showing £44,000 overspend. Why was this not included in the draft budget?

The Corporate Director of Finance stated that she would need to look at the report referred to and would respond to the Member.

Question: Referring to page 25 of the budget report, please can you explain the staffing reductions in planning services?

The Leader of the Council undertook to provide a detailed answer to the Member. He added that the Divisional Director of Planning had advised the challenge panel as to how this could be achieved. The Corporate Director of Finance added that draft Regulations in relation to planning charges had been published since the draft budget had been prepared and were likely to have an impact.

The Member stated that the Divisional Director had indicated that current levels were appropriate but, without detailed information, it was difficult for Members to challenge.

Question: Would it be possible to provide a statement setting out which items in the budget were Gershon efficiencies and which were cuts?

The Corporate Director of Finance stated that there were insufficient resources to do this work and that it would not be productive.

Question: In terms of equality, can we be assured that any budget cuts will not adversely affect one section of residents?

The Leader of the Council advised that the templates would provide this information and that the administration were mindful of Equality Impact Assessments. All Portfolio Holders would be attending a training course to supplement the training already undertaken.

Question: Can you provide clarification in relation to the Housing Revenue Account (HRA) and the proposed rent rises?

The Leader of the Council advised that the Tenants' and Leaseholders' Consultative Forum were considering draft proposals as the HRA was currently dysfunctional.

The Member questioned the planned overspend for the HRA which had increased from £670,000 to £1.5m and sought clarification as to who was responsible for housing. He also questioned why money owed to the HRA had not been recovered. The Leader responded that there was an ambitious housing plan to get the department back on track that the Council had a good Director of Housing, Portfolio Holder and Assistant. Consultation was underway with tenants, leaseholders and freeholders in relation to the HRA and a line would be included in budget report submitted to Cabinet in February.

Question: In terms of presentation, it was not helpful to have all items that were a reduction listed as efficiency savings. In order to have a more structured debate, could different terminology be used?

The Leader of the Council stated that the terminology used was the same as that used in the previous 4 years. The Member concerned stated that the previous Administration had detailed those items that were efficiencies and those which were savings.

Question: How does the reduction of £75,000 to Harrow in Business align with the manifesto pledge to protect businesses?

The Leader of the Council stated that review of funding to Harrow in Business was underway and that value for money had to be considered.

Question: How can I, as Leader of the Opposition, make suggestions or challenge the budget without all the relevant information?

The Leader of the Council advised that the opposition had received the information at the same time as his Group had received it in opposition and that the templates would be produced as quickly as possible.

The Chair thanked the Leader of the Council, Chief Executive and Corporate Director of Finance for their attendance and responses to the questions put. He advised that the minutes of the meeting would be submitted to Cabinet the following evening and that he and the Vice Chair would be making a brief presentation to that meeting.

RESOLVED: That the Cabinet be requested to consider the questions raised and comments made by the Committee in relation to the budget.

(Note: The meeting, having commenced at 7.30 pm, closed at 9.17 pm).

(Signed) COUNCILLOR JERRY MILES
Chairman

LONDON BOROUGH OF HARROW

OVERVIEW AND SCRUTINY COMMITTEE

12 JANUARY 2011

REFERENCE FROM CABINET – 15 DECEMBER 2010

Capital Programme

Cabinet received a report of the Chief Executive, advising of an overspend in the Children's Services Capital Programme. The report also summarised how the overspend had arisen and the steps taken to avoid any repetition. It was noted that an independent financial investigation had been undertaken by Rita Greenwood, Independent Financial Consultant and formerly Director of Finance, London Borough of Havering, and Pricewaterhouse Coopers (PwC) in this regard.

The Chief Executive invited Ms Greenwood to address the meeting in respect of her investigation into the financial management of the projects and the capital programme. Ms Greenwood stated that the investigation had related to two flagship projects and that, together with PwC, she had been appointed to ensure a transparent and open approach to the investigation. She had interviewed a number of officers and reviewed numerous documents as part of her investigation. A number of recommendations had been made and that the Council had shown a commitment to implementing the recommendations and to ensure that the whole of the organisation learnt from this experience.

The Chief Executive apologised to residents and Councillors for the mistakes of a small number of staff and assured Members that all the recommendations made by the investigation would be taken on board. He added that the Council's Governance, Audit and Risk Management Committee would be charged with reviewing progress made in relation to the recommendations and that Internal Audit would monitor compliance in six months' time. He proposed that the Overview and Scrutiny Committee be asked to carry out work on how projects were monitored.

The Chief Executive stated that there would be no impact on the services provided to residents or the Council Tax levied; as a result of this overspend.

The Leader of the Council also apologised to residents and stated that they, and the Councillors and staff had been badly let down. He reiterated that the overspend would not impact on front-line services or Council Tax. The investigations had been open and transparent.

The Leader added that he had kept the Chairmen of the Governance, Audit and Risk Management and the Overview and Scrutiny Committees, including the Leader of the Opposition, fully informed throughout. He did not want to score party political points about this matter. However, in case anyone did want to, for the record, these problems had not occurred on his 'watch'. The Leader stated that the Council needed to learn from its mistakes to ensure that such a situation never occurred again.

- (1) the report and the actions already being taken be noted;
- (2) the Governance, Audit and Risk Management Committee be requested to monitor and report on the implementation of the recommendations within agreed timescales;
- (3) **the Overview and Scrutiny Committee carry out development work on how the Council monitored its projects.**

Reason for Decision: To understand the issues in the Council's Capital Programme and their impact going forward.

FOR CONSIDERATION

Background Documents:

Report considered by Cabinet held on 15 December 2010.

Minutes of Cabinet held on 15 December 2010.

Contact Officer:

Daksha Ghelani, Senior Democratic Services Officer
Tel: 020 8424 1881
Email: daksha.ghelani@harrow.gov.uk

HEALTH SUB-COMMITTEE MINUTES

7 DECEMBER 2010

Chairman: * Councillor Jerry Miles

Councillors: * Ann Gate * Varsha Parmar
* Mrs Vina Mithani * Simon Williams

* Denotes Member present

RECOMMENDED ITEM

30. Health Scrutiny Sub-Committee - Terms of Reference

The Committee received a report of the Divisional Director of Partnership Development and Performance which outlined proposals for the revision of the terms of reference for the Health Sub-Committee, areas for future consideration in respect of the remit of the Sub-Committee and a proposed protocol for the appointment of co-optees.

Resolved to RECOMMEND: (to the Overview and Scrutiny Committee)

That

- (1) the proposed Terms of Reference, as attached, be agreed;**
- (2) the Health Sub-Committee be renamed the “Health and Social Care Scrutiny Sub-Committee”, to reflect the revised terms of reference incorporating social care.**

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PROPOSED NEW HEALTH AND SOCIAL CARE SCRUTINY SUB-COMMITTEE TERMS OF REFERENCE

The Health and Social Care Scrutiny Sub-Committee is responsible for scrutinising matters in relation to health, public health and social care. The Health and Social Care Scrutiny Sub-Committee also has responsibility for considering matters related to other general policy proposals and issues beyond the remit of health and social care but with implications on health outcomes.

The Health and Social Care Scrutiny Sub-Committee has the following powers and duties:

1. To be the key driver of the scrutiny function's health and social care scrutiny programme and maintain relationships with health and social care colleagues and partners in relation to shared stated priorities, in consultation with the Overview & Scrutiny Committee.
2. To be responsible for the discharge of the functions conferred by Section 21(f) of the Local Government Act 2000 of reviewing and scrutinising, in accordance with regulations under Section 7 of the Health and Social Care Act 2001, matters relating to the planning, provision and operation of health and social care services in Harrow.
3. To have specific responsibility for policy development and scrutiny of the following functions:
 - Health and social care infrastructure and service
 - GP Consortia and the Health and Wellbeing Board
 - Public Health
 - Other policy proposals which may have an impact on health, public health, social care and wellbeing
 - Collaborative working with health agencies
 - Commissioning and contracting health services
4. To conduct research, community and other consultation in the analysis of policy issues and possible options;
5. To consider and make recommendations for response to NHS consultations on proposed substantial developments/variations in health services that would affect the people of LB Harrow.
6. To consider and make recommendations for response to consultations from local health trusts, Department of Health, Care Quality Commission and any organisation which provides health services outside the local authority's area to inhabitants within it.
7. Continue to seek the development of relationship with GP consortia, Health and Wellbeing Boards, Care Quality Commission, LINK/ HealthWatch and the LMC.

Any health matter requiring an urgent decision/comment before the next meeting of the Health Committee will be considered by the Overview and Scrutiny Committee if that is sooner.

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**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE
AND SCRUTINY SUB-
COMMITTEES**

Date of Meeting:	27 January 2011
Subject:	Core Strategy – Proposed Submission Version
Responsible Officer:	Andrew Trehern – Corporate Director of Place Shaping
Scrutiny Lead Member area:	Keith Ferry – Portfolio Holder for Planning, Development and Enterprise
Exempt:	No
Enclosures:	Proposed Harrow Core Strategy Submission Document

Section 1 – Summary and Recommendations

This report introduces the submission publication version of the Harrow Core Strategy, which is intended to be published for public consultation in March 2011, prior to its submission to the Secretary of State in May 2011.

Recommendations:

The Committee is requested to consider and comment on the submission version of the Core Strategy which is to be reported to Cabinet at its meeting of 10th February 2011.

Section 2 – Report

Introduction

1. In accordance with its recently revised programme, the Council is preparing a series of statutory planning policy documents, which together comprise the Local Development Framework (LDF) for the Borough that will eventually replace the existing Unitary Development Plan (adopted in July 2004). The LDF will set out the Council's planning strategy and policies to guide the quantity, quality and location of new development in Harrow to 2026.
2. The Core Strategy is the key strategic level document within the LDF. Following the consideration by the LDF Panel of the responses made to consultation on the Council's 'preferred option' in January 2010, the Core Strategy has been revised in line with the LDF Panel Report of 7 September 2010. The revised Core Strategy is now ready for the next statutory stages in its preparation and progress to adoption - pre-submission consultation and formal submission to the Secretary of State (Regulations 27 & 30 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended)).

Purpose of the Core Strategy

3. The purpose of the Core Strategy is to set out the broad strategy and vision for the borough over the next fifteen years. It identifies the areas where development and growth will be promoted and specifies the quantum and types of development and land uses needed to deliver the vision for the area. It does not however allocate specific sites or include specific detailed policies or proposals for sites, areas or for use in the control of development. These tasks are assigned to the Development Management Policies DPD, the Site Specific Allocations DPD, and the Area Action Plan, all of which are currently being prepared for their initial round of public consultation in April 2011.
4. The Core Strategy has been developed over a number of years in consultation with the community and stakeholders, having regard also to the key issues affecting the Borough, the findings of evidence based studies, and the requirements of national and regional planning policies. Given its strategic nature, the Core Strategy is also a principal means by which to give effect to the Council's 'place shaping' role, helping to deliver the priorities set out in the Sustainable Community Strategy and the Council's other strategies and those of our public sector partners.
5. Recent published proposals in the draft Decentralisation and Localism Bill, whilst promoting the concept of neighbourhood plans, also serve to confirm the important role that the Core Strategy has in providing a borough-side strategic plan.

Background

6. Preparation of the Core Strategy has involved a number of stages beginning with consultation on the key 'issues and options' in 2006. In 2007 consultation was undertaken on four strategic options for the future development of Harrow. These were then revised down to two strategic options, which were consulted on in 2008 before being further refined to form the Council's 'preferred option', which was considered and endorsed by this Committee at its meeting of 12 October 2009 and was the subject of further public consultation from 12 November 2009 to 11 January 2010.

7. The results of consultation to the Preferred Option document were reported to the LDF Panel at its meeting of 11 March 2010. The key findings showed that:

- 73% of all respondents supported the revised spatial vision, although more detail was requested about the development and change that will happen to locations outside of the Intensification Area;
- 77% of all respondents supported the principle of a Harrow and Wealdstone Intensification Area but that such support was often conditional on demonstrating that the potential impacts of development could be managed. Those opposed cite the need for a more balanced approach to growth across the Borough;
- Majority support given to all eight strategic objectives with suggestions provided as to how these could be further improved, strengthen and better linked to implementation and delivery through the strategic policies;
- 63% in agreement to the overall approach to managing Harrow's growth. Where concerns were raised, these were again in respect of ability to manage the impacts of growth and deliver upon the strategic objectives, and to the principle of concentrating development within an intensification area;
- Support for the housing policy was mixed, with some questioning the need for further growth and the capacity of sites/areas to accommodate more homes at the levels proposed. Others wanted clarity around the different housing targets, the housing mix to be provided and the scope for flexibility;
- There was strong support for economic growth within business and retail sectors, but with caveats that these policies must be realistic with regard to the Harrow market and therefore greater flexibility would be needed to respond to changing circumstances. It was also felt that more focus was required on maintaining and enhancing the vitality and viability of district and local centres;
- With regard to transport, respondents recognised and supported the continued principle of achieving higher densities where public transport accessibility enables this but specified the need for continued investment in Harrow's transport infrastructure. Parking and how this is to be managed was also raised as a significant issue.

Key changes made

8. At its meeting of 7 September, the LDF Panel considered a detailed schedule of proposed responses to comments made to the 'preferred option'

document and how these would inform changes to the submission version of the Core Strategy. The LDF Panel endorsed the recommendation to alter the structure of the document by moving away from thematic based policies (i.e. policies that deal with a specific land use issue such as housing, transport, retail, open spaces etc) in preference to area based policies (i.e. policies specific to a place within the borough). The benefits of this change are:

- That the strategic objectives sought can be specific about the land use issues affecting an area;
- The policies can better reflect the strategic objectives for an area, making them more meaningful; and
- The means of delivery, and monitoring measures to be used, are relevant to the place and the achievement of the strategic objectives.

9. This change addresses the general criticism of the 'preferred option' document, that its policies focused too heavily on the Intensification Area and did not adequately address how areas outside of the Intensification Area would be developed. It also enables the vision for the borough to be altered to give a broader future vision for the borough as a whole.

10. In terms of providing more detail, officers have been compiling and completing the necessary evidence base studies required to more comprehensively respond to the concerns raised. The evidence base studies completed over the past year include the strategic housing market assessment; the development viability study; the employment land review; transport audit; the open spaces assessment; characterisation study; and the infrastructure assessment. The findings of these studies have been used in the submission version to confirm at the strategic level of this document:

- That sufficient capacity does exist to accommodate the distribution and levels of growth proposed and, in particular, 2,500 homes and 3,000 jobs within the Intensification Area;
- The type and mix of development required to meet local identified needs for housing (in terms of both tenure and size) and employment (in terms of retail, office and industry);
- That the resulting distribution and form of growth outlined is deliverable in the context of the spatial strategy;
- That development can support the delivery of affordable housing and other requirements including social and physical infrastructure; and
- The level and types of social and physical infrastructure needed to support new development.

11. Given that the 'preferred option' was generally well received, the submission version does not seek to alter the overall approach in terms of the quantum's and distribution of development proposed. Rather the submission version seeks to build on this by being more specific about how the different places within the borough will grow and develop and provides more detail, where necessary, to demonstrate how the kinds of development proposed will be delivered and how any potential impacts will be managed.

Further editorial requirements

12. Members should note that due to the timeframes involved in the Council reporting procedures that, at the time of publishing this report, the the version of the Core Strategy was and will still very much be, a work in progress, and subject to further internal consultation and rigorous editing. Whilst the structure and outcomes, in terms of housing numbers, jobs etc, will not change, final drafting of the document is still under development having regard to recent and emerging announcements from Government. The document is also to be published using the Limehouse Software System, which will enable interactive consultation. It will therefore require further formatting work using this software, particularly in relation to the insertion of images.

Next Steps

13. The proposed submission version of the Core Strategy - attached at Appendix 1 - will be considered by Cabinet on 10th February and by Council on 17th February. Subject to Council approval the Core Strategy will be published for pre-submission public consultation in accordance with Regulation 27 of the Town and Country Planning Regulations 2008, and the Council's Statement of Community Involvement (2007), for a six week period in March.

14. Copies of all responses received during pre-submission publication will then be forwarded to the Planning Inspectorate for consideration alongside the Submission Core Strategy, together with a Summary of Key Issues setting out the council's response to points raised. In contrast to previous stages of consultation, the Council will not be making any further substantial changes to the Core Strategy prior to submitting the Plan. However, a Schedule of Minor Post-Publication Changes (editing) will be prepared and submitted to the Planning Inspectorate.

Equalities Impact

15. An equalities impact assessment has been undertaken of the submission version of the Core Strategy. This builds on the previous EQIA's prepared for all previous formal stages of the Core Strategy's production. This confirms that the proposed policies of the Core Strategy will have a positive impact on target groups.

Legal Comments

16. The Core Strategy is the key Development Plan Document (DPD) in the Council's Local Development Framework which will provide the overall spatial vision and objectives for the Borough.

17. The legal requirements for the preparation, consultation and submission of the Core Strategy to the Secretary of State are prescribed by the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). A failure to comply with the statutory requirements may result in the Core

Strategy being found “unsound” by an Inspector at the independent examination.

Financial Implications

18. The cost of preparing, publishing, consulting and submitting the Core Strategy is contained within the existing LDF budget. The cost of examination of this document is incorporated in the LDF team budget for 2011/12.

Performance Issues

19. A key piece of LDF evidence base is the Annual Monitoring Report, which highlights the performance of existing UDP policies against a set of national and local indicators. The findings of the latest AMR have been used to inform the proposed policies of the Core Strategy, which seek to address areas of weak performance and to build on those areas where the borough has performed well. The following table summarises relevant planning performance indicators:

Which performance indicators will be impacted by the proposal?	What is the current performance of those indicators?			Potential impact of the policies of the Core Strategy
	Target 09/10	Actual 09/10	Target 10/11	
NI154 Net additional homes provided	400	460	400	Makes provision for a 15-year housing supply in accordance with government guidance PPS3 that meets the existing and new London Plan strategic housing requirement for Harrow.
NI155 Number of affordable homes delivered (gross)	165	143	165	Seeks to secure the maximum affordable housing provision from individual sites of 10 and above units.
NI157 Processing of Planning applications as measured against targets for ‘major’, ‘minor’ and ‘other’ application types	69%	84%	69%	Sets the framework for later LDF documents including that for Development Management. An update development management plan will assist greatly in certainty to developers and help Council to determine future planning applications in accordance with statutory timeframes.

NI159 Supply of ready to develop housing sites	100%	100%	100%	Makes provision for a 15-year housing supply in accordance with government guidance PPS3 that meets the existing and new London Plan strategic housing requirement for Harrow.
NI170 Previously developed land that has been vacant or derelict for more than 5 years	No specific data set	5.7 ha	No specific data set	Identifies and encourages development of Brownfield sites where these have been vacant or derelict for a period of 6 months or more.
NI171 VAT Registration rate	No specific data set	88.4%	No specific data set	Seeks to retain and support existing and new businesses and in particular small to medium size enterprises through provision of start-up units.
NI186 Per capita reduction in CO2 emissions in the LA area	7.5%	4%	7.5%	Seeks to reduce CO2 emissions through locating housing in areas of high public accessibility and through requirements for higher sustainable building design standards.
NI188 Adapting to climate change	Level 1	No data	Level 1	Seeks to address the impacts of climate change through provision for sustainable building design and appropriate strategic mitigation through provision for CHP schemes as well as flood mitigation measures.
NI189 Flood and coastal erosion risk management	100%	100%	100%	The SRFA was completed in July 2009 and has taken into account in preparing the Strategy and the future distribution of housing
NI191 Residual household waste per head	230	240.82	225	Focuses on ensuring development manages waste towards the higher end of the waste hierarchy.
NI192 Household waste recycled and composted	40%	46%	42%	Focuses on ensuring development manages waste towards the higher end of the waste hierarchy.
NI197 Improved local biodiversity – active management of local sites	4	4	3	Addresses the functionality of open space and the ability to create continuous green chain links. It also gives statutory protection to sites of conservation
What is the current performance of these indicators?	The above table shows current year and targets for 10/11. It is expected that the Core Strategy brings forward pro-active strategic policies to provide the capacity and delivery means by which to meet these targets.			

How much will current performance be improved or other negative effects be mitigated?	The adoption of the final Core Strategy will ensure the council has delivered upon these major performance strands and complies with the Place Shaping agenda.
--	--

20. The Government has announced its intention to withdraw National Indicators as from 1 April 2011 but to substitute a list of data requirements. Many of the datasets underlying the above indicators will still be required and the Council is in the process of reviewing the performance measures it needs to manage its business.

Environmental Impact

Does the proposal comply with all relevant environmental legislation? Yes

21. The consideration of environmental impacts is an integral and ongoing part of the process of preparing the Core Strategy. This includes requirements under the Planning and Compulsory Purchase Act (as revised) to undertake Sustainability Appraisal, incorporating Strategic Environmental Assessment, informing each stage of a document's production. In preference to repeating the assessment and findings of the Sustainability Appraisal, a copy of the Report is available electronically. It should be noted that the Sustainability Appraisal will also be published alongside publication of the Core Strategy.

Risk Management Implications

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	The Examination in Public will be held to test the soundness of the Core Strategy. Under the Planning and Compulsory Purchase Act an Inspector is charged with first checking that the plan has complied with legislation.	Despite changes to the Planning Regulations since they were enacted in 2004, officers have sought to ensure compliance with the relevant legislation and have maintained a log that chronicles such compliance.
Producing a 'sound' document	To be 'sound' a Core Strategy should be justified (i.e. founded on a robust and credible evidence base & the most appropriate strategy when considered against reasonable alternatives) and effective (i.e. deliverable, flexible and able to be monitored).	Extensive public consultation has been undertaken on a range of strategic development options during the Core Strategy's development in accordance with the adopted SCI. Significant work has been undertaken over the past year to ensure the Core Strategy is supported by a robust evidence base and that the policies developed

		are realistic and deliverable.
Consistent with national policy	Unless there is robust local evidence to support a variation, the policies of the Core Strategy need to be consistent with those set out in national planning policy (i.e. Planning Policy Statements (PPS) and Planning Policy Guidance (PPG)). The coalition Government has signaled its intention to replace the current set of PPS's and PPG's with a more simplified and streamlined set of policy statements. However, to date only minor amendments to existing PPS have been made	New national policy statements will need to be subject to a period of public consultation. Any proposed changes to national policy will be reported to the LDF Panel for its consideration. Where changes to existing PPS are made with immediate effect, the recommendations to Cabinet seek delegated authority to make the necessary amendments to the submission version of the Core Strategy to take account of such changes.
'General conformity' with the London Plan	The Core Strategy has to be in general conformity with the London Plan.	Officers will continue to work with colleagues in the GLA over the policy position to be reflected in the Core Strategy prior to the replacement London Plan being adopted.

Corporate Priorities

The Core Strategy will help to deliver the current corporate priority:

- **Build stronger communities:** Engagement with the community and others is at the heart of the LDF process. The submission version of the Core Strategy sets out how the Council is responding to the community's concerns and how it seeks to ensure that the development and growth within the borough reflects the priorities and preferences of residents.

And the emerging Corporate priorities:

- **Keeping neighbourhoods clean, green and safe:** by protecting and enhancing our open spaces; and
- **A Town Centre to be proud of:** changing Harrow for the better; by providing the policy framework to manage change and maximise the benefits of new development and growth, including securing retail growth, office renewal and improvements to the environment and infrastructure of Harrow Town Centre.

Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the* Chief Financial Officer
Date: 12 January 2011		
Name: Abiodun Kolawole	<input checked="" type="checkbox"/>	on behalf of the* Monitoring Officer
Date: 11 th January 2011		

Section 4 - Contact Details and Background Papers

Contact: Matthew Paterson, Senior Professional Planning Policy, Place Shaping, 020 8736 6082

Background Papers:

Core Strategy Preferred Option (November 2009)
LDF Panel Information Report (11th March 2010): Schedule of Detailed Consultation Comments and Council's Initial Considerations
LDF Panel Information Report (7th September 2010): Council's Proposed Response to Consultation Comments
LDF Evidence Base Studies

NB: All of the above background papers are available via the Council's website

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Introduction

Draft Core Strategy (Pre-Submission) for O&S

Introduction

1. Introduction

Box 1

Status of the document and consultation

This is the proposed Submission draft of the Harrow Core Strategy. The Council will consult formally for six weeks on this document from x to x 2011 (Please note that all comments received during this stage will be in the public domain). After this the Council will submit it to the Secretary of State, who will test it for soundness. More details are set out in Section 1.x (Next Steps)

The Core Strategy and all supporting documentation can be found on the Council's website at www.harrow.gov.uk (under Local Development Framework) and also via our external consultation portal at <http://harrow-consult.limehouse.co.uk>. Hard copies of the Core Strategy are available for inspection and short term loan from the Council's offices at the Civic Centre and at all public libraries in the Borough.

How you can make your comments

If you wish to comment on the soundness of the document, the easiest way is to use our online external consultation portal, otherwise you will need to use the response form provided. Please note that a separate form will need to be completed for each comment you wish to make. Copies of the response form are available from the Council's website, the consultation portal, the Civic Centre and at all public libraries in the borough. Once completed, these can be return to the Council in the following ways:

- Electronically by filling in the response form online on the Council's website or through the Council's consultation portal at <http://harrow-consult.limehouse.co.uk>;
- By email to ldfconsultation@harrow.gov.uk; or
- Filling in the response form and posting it to: Planning Policy Team, Room 301, Harrow Council, Civic Centre, Station Road, Harrow HA1 2XF

The closing date for receipt of comments is the X **April 2011**

Guidance on using our online external consultation portal are set out in Appendix 1, along with further details on how to fill in the response form.

1.1 Harrow's Core Strategy

.1 Over the next fifteen years and beyond, Harrow will experience changes from population growth, increased diversity, an uncertain economic climate, the need to address the impacts of climate change and technology innovations. Growth and development in Harrow provides the opportunity to bring about real and positive change to address local issues and to meet identified community needs for housing, jobs and wellbeing.

.2 The challenge for Harrow is to ensure that we pro-actively plan for and manage growth and the changes it brings in a way that delivers these opportunities while preserving the qualities, character and environment that our communities value. The Core Strategy seeks to meet these challenges through a shared vision for how the borough is to develop and strategic objectives setting out what needs to be done to deliver our vision. In particular, it establishes where and how change will be promoted in Harrow (the spatial strategy), and specifies the quantum and types of development and land use (core policies) that will be needed to bring about such change.

.3 The purpose of the Core Strategy is to ensure that the Council and its delivery partners in the public, private and voluntary sectors work together to deliver the vision and realise benefits and opportunities afforded by new development and growth – including securing the improvements needed in social and physical infrastructure to build stronger communities and to create an economic environment that attracts further inward investment, and that provides our residents with an equal opportunity to thrive in work, social and family life.

.4 The Core Strategy has been developed having regard to:

- the shared local priorities of the Harrow Sustainable Community Strategy (March 2009);
- comments received to previous consultations⁰ on options for growth;
- the evidence base, which is available on the Council's website; and
- the need to give effect to national planning policy and the regional spatial plan (the London Plan 2008 and draft Replacement London Plan), elaborating on these as necessary to take account of local circumstances, of identified needs and opportunities.

1.2 The Core Strategy in Context

Local Development Plan

.5 Eventually the Core Strategy will be supported by a range of accompanying documents that will set out in more detail, the potential development sites, policies to manage development and growth, and area action plans for specific parts of the Borough. Collectively these documents are known as the Local Development Framework which, along with the London Plan, forms the local development plan for Harrow.

The London Plan

.6 London is the nation's economic engine and Harrow, like other outer London boroughs, plays an important role in contributing to London's continued success as a prosperous and competitive global city. This status will see London continue to grow and change to meet this role. Within this

Strategic Options for the Future Development of Harrow (December 2006), the draft Core Strategy Draft Preferred Options (June 2008) and the Core Strategy Preferred Option (November 2009))

Draft Core Strategy (Pre-Submission) for O&S

context Harrow has two functions. Firstly, as one of 33 boroughs that each need to play their part in contributing towards the strategic future of London and, secondly, as a city within a city that needs to provide for the range of jobs, housing and the high quality of life that its residents expect.

.7 The London Plan is the overall strategic plan for London, setting out policies to achieve integrated economic, environmental and social development over the next 20-25 years. It provides both a strategic and spatial framework for London as a whole, and includes targets and policies to be applied and achieved at the borough level. Section 24 of the Planning and Compulsory Purchase Act (2004) requires that this Core Strategy be 'in general conformity' with the policies in the London Plan in addition to any national policies. The challenge for the Core Strategy has been to ensure that it meets Harrow's local needs and aspirations for its future, and in doing so clearly contributes to, and supports, the achievement of the broader London-wide objectives.

.8 The London Plan is currently the subject of review and replacement. It has been the subject of consultation and examination. However, this revision has taken place at a time of significant change to the regional planning structure in the UK, so it remains to be seen what for the final document might take, especially in respect of strategic targets for housing and standards for development. Nevertheless, Harrow's strategy for managing growth and development was consistent with the earlier drafts and has sought to capitalise upon the proposals that Mayor outlined in the draft Plan.

Harrow's Local Development Framework

.9 Harrow's Local Development Framework comprises a suite of planning policy documents, which help to give effect to the Core Strategy and the achievement of the spatial vision and strategic objectives. To support the Core Strategy the Council will in due course produce the following documents:

- Development Management Policies - Provide specific detailed policies against which to assess development, ensuring that future development meets the vision and strategic objectives of the Core Strategy.
- Site Specific Allocations - Identifies and allocates specific sites for future large scale development within Harrow and provides further site specific policy context.
- Harrow and Wealdstone Area Action Plan - Sets out the specific policies relating to development and land use within the Harrow and Wealdstone area of intensification to ensure development is managed in a comprehensive manner and set in the context of delivering the built form as well as social, environmental and economic outcomes sought for this area.
- Joint West London Waste Plan - Provides the policy framework for the management of waste, recycling and disposal across the west London sub-region.
- The Proposals Map illustrates the LDF policies on a reference map and is also available to view interactively online at: <http://harrow.addresscafe.com/app/exploreit/>.
- Supplementary Planning Documents - these documents provide detailed guidance to assist applicants in interpreting development plan policies.

.10 A list of the planning policy documents that the Council is intending to prepare and the proposed timetable for each are set out in Harrow's Local Development Scheme.

.11 The Harrow Unitary Development Plan (UDP) 2004 and the London Plan will continue to form the development plan for Harrow until the relevant documents that make up the Local Development Framework have been adopted. The Core Strategy, once adopted, will replace the remaining UDP policies within Section 2 - Strategic Context and Part 1 policies.

.12 A list of superseded, deleted and saved UDP Policies is contained at Appendix 2.

National policy context

.13 [Needs redrafting regarding reform of current PPSs]

Sustainability

.14 A sustainability appraisal of the Core Strategy has been prepared to test whether the strategic policies are consistent with the Council's sustainability objectives. These objectives consider a range of important social, economic and environmental issues which need to be met if the Harrow LDF is to be regarded as sound, as well as consistent with the wider aims of the Council's Sustainable Community Strategy.

.15 The sustainability appraisal incorporates the requirements of the EU Strategic Environmental Assessment Directive and Habitats Directive. The appraisal process has guided the Council's assessment of policy alongside its consideration of whether the policies contained within the Core Strategy are consistent with national policy, regional policy (the London Plan and other guidance), the Sustainable Community Strategy and the findings of public consultation.

Next steps

.16 Following the consultation on this document in March 2011, copies of all responses received during pre-submission publication will then be forwarded to the Planning Inspectorate for consideration alongside the Submission Core Strategy, together with a Summary of Key Issues setting out the council's response to points raised. In contrast to previous stages of consultation, the Council will not be making any further substantial changes to the Core Strategy prior to submitting the Plan. However, a Schedule of Minor Post-Publication Changes (editing) will be prepared and submitted to the Planning Inspectorate. The examination in public will then be held by an independent Planning Inspector (anticipated in August 2011). The Inspector's report will be binding on the Council and the Council expects to formally adopt the the final Core Strategy following receipt of the Inspector's report towards the end of the year.

Core Strategy Context

Draft Core Strategy (Pre-Submission) for O&S

Core Strategy Context

The Story of Harrow

.1 Harrow has developed from a series of village centres into a successful outer London borough that continues to perform an important role within the overall housing market of west London. Its network of town centres, high quality open spaces and extensive Green Belt, good schools, low crime rate, along with its historic assets and excellent transport links to central London have combined to contribute significantly to its desirability as a place to live, work and visit. These considerable existing attributes, and its potential to develop further, make it attractive to investment. However, this masks the fact that the borough also has pockets of deprivation and many of the community assets are in need of renewal or replacement. The challenge for Harrow is to accommodate further development but in a manner and form that is tailored to meet our local needs, provides for our future social and economic wellbeing, addresses areas in decline, and protects and improves those elements and features that make Harrow attractive.

.2 In respect of economic and regeneration activities, Harrow is not as competitive as it could be. Harrow town centre is one of 12 metropolitan centres in London but has not kept pace with growth experienced by neighbouring centres and is in need of some renewal. The office and industrial sectors have been in decline and are not attracting regional market interests. Yet, despite the current economic climate, our town centres and employment areas have maintained their viability with relatively low vacancy rates and significantly, demand for new hotel developments and education and training facilities. We also have unique strengths, in terms of our diverse, highly skilled and entrepreneurial population that provide the opportunity for the borough to carve out a clear role for itself in support of west and outer London's wider economic offer.

.3 This section of the Core Strategy further elaborates on the matters raised above and highlights the significant opportunities and key drivers that will shape the future of the borough.

.4 2.1 Figures at a Glance

- 5047 ha in area (1,334ha open space (26%), 2,621ha residential (52%), 89ha employment (1.8%) and 1,003ha roads & infrastructure);
- A population of 218,000, rising to 223,500 by 2026;
- Over 51% of residents were from ethnic minority groups in 2001;
- Annual strategic housing requirement of 400 reducing to 350 from 2011
- 2787 net new dwellings completed over the past 5 years (2005/6 – 2009/10);
- 768 affordable homes delivered over the same period (27.6%);
- 75% of housing in owner-occupier sector;
- Average household price is eight times the average household gross income;
- Second lowest crime rates in London but with pocket problem areas;
- Disproportionately high fear of crime;
- As many as 20,000 people with carer responsibilities in the Borough;

.5 2.2 Population and Demographics

.6 [Need new figures to reflect latest ONS estimates]

.7 Harrow residents enjoy good life expectancy (78.9 years for men and 83.1 years for women) resulting in a disproportionately high increase in the proportion of older residents and adults living alone. Nearly 14% of the Harrow population are over the age of 65 compared to a London average of 11%. Forecasts show these trends are set to continue with an increasing number of people aged over 85. However, at the opposite end of the age spectrum, the borough will also see a growth in the under 15 age group (9.8%). This has short-term implications, especially for primary school provision, and more acutely, provision serving the central part of the borough. The increase in older people will result in a corresponding increase in the need for different health and social care services. With many services now be tailored to the individual, this is enabling older residents to remain in their homes, placing greater pressure on provision for new family accommodation.

.8 Harrow is already one of the most diverse boroughs in London and the most religiously diverse in England (see Figure 1). A significant proportion of Harrow's residents are of Indian origin and overall around 53% of the population are from minority ethnic groups. As the population grows Harrow can expect to see further increases in the proportion of its black and ethnic minority population and housing growth will need to take account of the specific needs arising from this diverse population.

.9 Figure 1: Harrow's Ethnic Origins [to insert]

.10 2.3 Environment and Infrastructure

.11 The borough is well served by both mainline rail and underground services. Four underground lines traverse the borough – the Metropolitan, Jubilee, Bakerloo and Piccadilly lines with stations situated across the borough. The mainline rail provides services to central London, Northampton, Birmingham, Gatwick, Watford and Aylesbury. While provision and capacity in both rail and underground are good, disabled and step-free access to platforms remains an issue, especially at the Harrow-on-the-Hill station which serves the main town centre and acts as a central transport hub.

.12 Road links are good, with a good grid network of major roads which link to the M1, M25 and M40 motorways. These road links support a comprehensive bus service proving 30 routes that are crucial to providing radial connections to our neighbouring outer London boroughs in the absence of an orbital rail service.

.13 With regard to climate change and carbon reduction, the Council signed up to the Nottingham Declaration in 2007 and is committed to fulfilling its obligations under the declaration. A major challenge for the Council, in seeking to reduce carbon dioxide emissions (and tackle air quality problems), is the reliance on the car as a means of transport among residents in the borough. For many who commute to work outside the borough but not to central London, the car is an integral part of life. Over 70% of households in Harrow owned a car at the time of the 2001 Census and two thirds recorded that they had access to two or more cars at home.

.14 New development will provide the opportunity to achieve modern, high standards of efficiency in resource use, particularly for heating, and water consumption. However the predominance of pre-war period detached and semi-detached housing in Harrow represents a significant climate change challenge for the borough. This is being addressed in part, by the Decent Homes Programme and other initiatives such as Warmzone, which seeks to give support and advice to landowner and tenants on accessing available funding to install or improve thermal insulation; including loft insulation, cavity walls insulation, draught proofing and central heating.

.15 Harrow has a substantial environmental resource in its extensive network of open spaces, gardens and watercourses. These assets contribute significantly to Harrow’s reputation as a green and leafy suburban borough. Over a quarter of the borough (1334ha) consists of open space. These range from large areas around Harrow Hill to smaller gardens and recreation grounds. However, the distribution of provision is uneven and the central part of the borough, which includes the Intensification Area, is identified as being deficient in most types of open space provision. It is unlikely, given the limited availability of land that such deficiencies will ever be adequately addressed but improvements in the accessibility to, and quality of, our open spaces will go some way to alleviating perceived concerns. To this end, the Council is in the process of developing an Open Spaces Strategy and Green Grid.

.16 A further attractor to the borough is its good educational record. Harrow features many state-funded primary and secondary schools as well as handful of voluntary aided schools and several large tertiary colleges. However, it is the independent schools of Harrow School, John Lyon, North London Collegiate, Heathfield, Pinner, Orley Farm and Reddiford that contribute significantly to Harrow’s worldwide reputation. Recent changes to the transfer age and the use of bulge years has helped to address some of the immediate deficiencies in capacity but there is a need to provide at least two new primary schools to serve the central part of the borough. Further expansion of sixth form provision in the secondary schools is also required to retain more pupils and to provide an alternative to more costly tertiary colleges.

.17 2.4 Economy

.18 Harrow, like many outer London boroughs, has a small but strong local economy while at the same time having significant links with the employment opportunities in central London and neighbouring boroughs. Around 31% of Harrow’s residents work within the borough, 22% commute into central London, and about 25% work across the borough boundary in Brent, Hillingdon, Barnet and Ealing. There is also significant in-commuting into the borough from neighbouring boroughs and central London but most notably from south Hertfordshire (Watford, Hertsmere).

.19 There are just over 10,000 businesses in Harrow (Annual Business Inquiry – Workplace Analysis 2008). 78% of these are small businesses employing less than 4 people (See Table 2). Many of these are in the professional and business service sectors. However, there are only 38 businesses in the borough that employ 200 or more people – but significantly, these account for 25% of the total number of jobs in the borough. The current local economic conditions, although difficult, do show signs of recovery. Nevertheless, with 18,000 people (27%) of Harrow’s workforce being employed in the public sector, the reductions to public spending are likely to have a significant effect at the local level in the short and medium term. Also, having a small number of large businesses means that the borough is vulnerable should any of these large businesses decide to relocate or close.

.20 Table 2: Local Units by Employment Size Band

	Harrow	London	Ealing	Brent	LBHF	H'don	H'low
All VAT and/or PAYE Based Local Units	10215	401445	14010	12035	11740	11105	10405
All 0 to 4 Persons Employed	7985	288870	10625	9060	8710	7550	7425

Percent	78.2	72	75.8	75.3	74.2	68	71.4
All 5 to 9 Persons Employed	1165	52335	1615	1475	1400	1490	1360
Percent	11.4	13	11.5	12.3	11.9	13.4	13.1
All 10 to 19 Persons Employed	545	29105	855	755	770	840	725
Percent	5.3	7.3	6.1	6.3	6.6	7.6	7
All 20 or More Persons Employed	520	31135	915	745	860	1225	895
Percent	5.1	7.8	6.5	6.2	7.3	11	8.6

.21 Source: ONS Neighbourhood Date: March 2009

.22 However, in the medium to long-term, slow but steady employment growth is likely. Forecasts project a small increase of just less than 4,000 from 82,000 to 86,000 in total jobs within the borough between 2009 and 2021. Growth in the hotels, restaurants and other services sectors will exceed job losses to be experienced in the public administration, manufacturing and construction sectors, which are all set to decline (See Table 3).

.23 Table 3: Total Employment Change by Sector

Sector	2009	2016	2021	Change % 2009-2021
Primary and Utilities	81	68	60	-25.9
Manufacturing	4,556	3,816	3,362	-26.2
Construction	5,833	5,398	5,108	-12.4
Wholesale	4,628	4,468	4,357	-5.9
Hotels & Restaurants	4,697	5,856	6,855	45.9
Transport & Communications	3,225	3,114	3,037	-5.8
Retail Trade	9,635	9,656	9,670	0.4
Financial Services	2,788	2,808	2,822	1.2
Business Services	17,664	18,291	18,753	6.2
Public Administration	3,858	3,596	3,419	-11.4
Health and Education	19,097	19,003	18,937	-0.8
Other Services	6,303	8,129	9,748	54.7
Total	82,365	84,203	86,130	

.24 Source: Harrow Employment Land Review - – Baseline Scenario NLP analysis of GLA trend-based employment projections (October 2009) Harrow Council Analysis

.25 2.5 Unemployment and Deprivation

.26 The unemployment rate averaged 2.7% in 2008/09, a 0.3% increase upon the previous year. This will certainly rise as a result of the current and projected economic climate but is expected to still be below national and London levels.

.27 With regard to deprivation (income; employment; health and disability; education, skills and training; barriers to housing and services, living environment; and crime) Harrow’s overall position is well below the national average, ranking 197th out of 354 districts in England. However, Harrow’s position has worsened since the 2004 indices, when the borough was ranked in 232nd place. Our Local Economic Assessment has identified a close correlation between the most deprived communities in the borough and concentrations of social housing (See Figure 2), with most of these wards falling within the central area or in areas identified for housing estate renewal. The reasons for these concentrations are complex with worklessness and poverty being part of a cycle of disadvantage including ill-health; crime; substance abuse; lower levels of attainment at school and family breakdown.

.28 Figure 2: Income Deprivation by LSOA & Location of Social Housing

.29 A priority for the Council and its partners must be to tackle the causes of deprivation so that all residents can benefit from social and economic growth within the borough. In this respect, housing investment will be critical.

.30 2.6 Housing and Residential Character

.31 The vast majority of the borough’s 85,955 dwellings are of inter-war metroland stock, consisting of owner-occupier three-bedroom, two storey semi-detached houses. However, in recent years one and two bedroom flats have accounted for the bulk of new dwellings. Harrow has one of the highest levels of private sector housing. 75% of housing in the borough is owner occupied, with less than 11% being social housing – significantly lower the London and national average. Table 4 provides the breakdown of housing tenures in Harrow.

.32 Table 4: Housing Tenure

Tenure	Number	%
Local Authority	5,093	5.9
RSL	3,851	4.5
Other Public Sector	175	0.2
Private Sector	76,836	89.4
Total	85,955	100.0

.33 Source: Harrow Annual Monitoring Report 2009/10

.34 In 2008/09 the average house price was £287,945 – eight times the annual average gross salary of Harrow residents. Such high house prices mean that much of the existing stock is unaffordable for families on low incomes. Yet within the West London context, Harrow has the lowest level of housing need (as measured in the HNI index and through the Sub-Regional Housing Market Assessment (SHMA)), although this is partly due to our success in making best use of the private rented sector to offer alternative housing solutions to housing applicants. Through the sub-regional SHG allocation process and redistribution of nominations based on housing need, Harrow has consistently been delivering new affordable housing in accordance with its agreed targets. As a result we offer up a small number of social housing nominations into the West London nominations distribution pool.

.35 Nevertheless, there are still significantly high levels of housing need as evidenced by the Harrow Housing Needs Survey 2006 and the SHMA. The latter identifies an affordable housing requirement across the sub-region of 140,599 over five years, or around 4,000 affordable dwellings per annum by each borough. This is nine times in excess of Harrow's and the west London borough's combined planned delivery target for all new homes over five years – of 1,750 and 21,560 respectively. It is therefore clear that such need will never be met as it would require all new housing to be 100% affordable, and even then, would still result in a shortfall of nearly 119,000 affordable homes based on identified capacity to accommodate new growth across the sub-region. The SHMA therefore rightly looks to constrain housing need to identified housing capacity. The results for Harrow are set out in Table 5, which also identifies the biggest shortfall to be in the supply of 2 bed affordable housing, but also a substantial need for larger family affordable social homes.

.36 Table 5: Total Shortfall or Surplus (Size Requirement)

Tenure	1 bed	2 bed	3 bed	4+ bed	Total
Market	-184	2,331	-1,394	189	942
Intermediate (including social private rented)	531	-386	183	-180	184
Social Rented	139	347	149	21	655
Total	486	2292	-1,063	30	1,745

.37 Source: Draft West London Sub-Regional Strategic Housing Market Assessment (2010)

.38 Over the past five years (since 1st April 2005), Harrow has delivered 2,787 net additional units in conventional supply, exceeding its existing London Plan target of 400 net additional homes per year by over 1,000 units. Despite past levels of performance, on the basis of the detailed assessment of site availability through the SHLAA and in recognition that Harrow has limited vacant or undeveloped land, the Council has agreed with the GLA (subject to local development viability testing) that our strategic housing requirement should be 350 additional homes per annum from 2011.

.39 Nevertheless, our housing pipeline shows that completions are anticipated to exceed our London Plan targets over the next five years. There are 3,330 net units identified in the Five Year Housing Supply – the majority, 1,977 from sites with planning permission and 1,353 from other identified sites and sites with legal agreements. Beyond 2015, we still anticipate steady growth

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as the market recovers and strategic sites across the borough are built out. There is greater uncertainty beyond 2018, although we would expect a handful of new sites to come forward, primarily through further release of industrial land and conversion of redundant office stock.

Vision

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Vision

Harrow's Spatial Vision

.1 The Core Strategy spatial vision sets out how the Borough, and the constituent districts and suburbs within it, will be developed. The document provides for the accommodation of growth in housing and economic development in Harrow over the next 15 years, but the spatial strategy is also intended to offer a lasting solution to the management of the Borough's historic and natural environment over the long term.

Statement 1

Harrow's Spatial Vision

By 2026 Harrow will be a more sustainable community.

The Harrow & Wealdstone Intensification Area will have delivered at least [2,500]⁰ new homes within a distinctive new urban form for the Borough which safeguards the setting of Harrow Hill and comprises coherently designed and carbon neutral buildings, a district heat & power network and a high quality, Lifetime neighbourhood. Within the Intensification Area open spaces, tree planting and green roofs will have enhanced biodiversity, will have controlled the urban heat island effect and will have aided sustainable urban drainage to manage flooding and water consumption. Harrow town centre will have benefited from significant new comparison retail & hotel development and will have been the focus for consolidation and renewal of the Borough's office market, safeguarding its status as one of London's Metropolitan centres. Harrow-on-the-Hill station will remain the transport hub serving the town centre, enjoying a better interchange with a bus station which meets operator requirements and passenger expectations. Wealdstone will be a location of choice for local industry and small & medium sized enterprises because of its accessibility, links with local colleges and the skills resource of the local labour market. Housing-led development will have contributed to the physical renewal of Wealdstone district centre and will have supported additional new convenience retail floorspace.

Opportunities for redevelopment and conversion of redundant office space within the Borough's district and local centres will have been optimised, consistent with their position in the town centre hierarchy and public transport provision, and will have contributed to the centre's infrastructure, services and vitality. These centres will have contributed to the delivery of new homes and the balance of retail growth not met in Harrow town centre and Wealdstone. Development within the centres will have achieved key sustainability requirements and will have contributed to the centre's environmental and public realm improvements, and their vitality and viability as district and local centres.

The housing needs of the Borough's residents will have been met through provision of a range of housing types and tenures including provision of family sized affordable housing and supported housing for the elderly and vulnerable people. Delivery will have been maximised from private developments, contributions to off site provision, estate renewal and housing association led schemes, as well as bringing back into use long-term vacant housing stock.

The leafy, suburban character of residential areas beyond the Harrow & Wealdstone Intensification Area and the district & local centres will have been safeguarded as areas of low density, family housing. Gardens will have been protected from development, both as an amenity and as an environmental resource. Development opportunities, where they have arisen, will have been successfully managed to integrate with their surroundings and will have contributed to environmental improvement and infrastructure in the locality.

This figure is still the subject of local development viability testing and development capacity scenario testing

The Borough's network of open spaces will have been successfully linked up as part of a grid of green infrastructure providing opportunities for residents, thriving biodiversity, natural drainage, a counter to the urban heat island effect and partial mitigation of local light and air pollution. There will have been a net increase in the Borough's green infrastructure as opportunities to add to the grid will have been identified and implemented.

Principal health service and Council functions will have been located within the Harrow and Wealdstone Intensification Area and Harrow College's campuses will be consolidated on a single, Harrow town centre site. Non-hub services and GP practices will be located within the district and local centres of the communities that they serve. Building Schools for the Future programmes will have improved the quality of the Borough's schools and will have delivered dual community use of facilities provided through the programme. Funding for school capacity enhancements will have focused on those serving the Intensification Area, with incremental capacity enhancements to schools elsewhere led by demand through developer funding.

As now, many residents in Harrow will be commuting out of the Borough to take advantage of employment opportunities that exist elsewhere in London. However commuting by car will have been managed by enhancements to the functionality and quality of our main transport hubs, a strong direction for development to locate in areas of highest public transport provision, improved orbital transport links across Harrow to neighbouring boroughs and centres, and technology enabling greater use of home & flexible working arrangements. Whilst large employers will remain important to the local economy, the entrepreneurial flare of residents will have been fostered by the provision of affordable premises, managed meeting spaces & services, and support through the Harrow Strategic Partnership.

The overall amount of waste generated in the Borough will have been reduced, with high levels of recycling and composting achieved and sustained. Through the adoption and implementation of the West London Waste Plan, Harrow will have contributed to the management of West London's waste within the sub-region.

Borough-wide Strategic Objectives

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Borough-wide Strategic Objectives

Harrow's Core Strategy Objectives

.1 The following borough-wide strategic objectives outline what we need to do to deliver our shared vision for Harrow. They build on the objectives of the Harrow Sustainable Community Strategy and draw on findings of the evidence base and the views of residents and businesses about what needs to happen to manage the impact of development and growth of the borough as a whole.

1. Protect the features that define Harrow and that make it a desirable place to live, work and visit, including extent of land currently designated as Green Belt, Metropolitan Open Land or open space; scheduled heritage assets, listed buildings & the existing conservation areas; and back gardens and metroland character.
2. Permit new development where it responds positively to the distinctiveness of the local context in terms of design, siting, density and spacing, reinforcing the attractive qualities of an area and enhancing areas of poor quality through better design.
3. Secure a supply and mix of housing of different types, sizes and tenures in all parts of the Borough.
4. Increase the supply of affordable housing, especially of the type and size needed to meet local needs and improve the quality of life of our most vulnerable residents.
5. Take action to remedy the social, economic and environmental issues that have led to small pockets of the borough exhibiting high levels of deprivation and act now to address areas in steady decline, such as Wealdstone and North Harrow.
6. Ensure our network of district and local centres continue to provide a range of shopping, leisure and local services to meet the needs of the local community and support Harrow's economy.
7. Harrow Town Centre [Update with new Corporate priorities]
8. Support the Borough's education providers and hospitals as major employers and service providers in their efforts maintain and improve their campuses and estates.
9. Upgrade or replace tired local facilities and improve the quality and useability of our open spaces
10. Celebrate Harrow's cultural diversity, ensuring the localism agenda identifies with and reflects our different communities.
11. Minimise Harrow's contribution to climate change and ensuring we are able to cope with the effects of a changing climate.
12. Reduce the impact of development and growth on the environment ensuring resources, such as energy, water and minerals are used as efficiently as possible, and waste is
13. Improve transport connections and capacity within the Borough and to major employment locations in neighbouring boroughs and across London

.2 The above objectives are not provided in any order of importance or priority. They are however, supplemented at the beginning of each core policy by more detailed set of objectives specific to the part of the borough or land use issue covered by the policy.

Spatial Strategy

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Spatial Strategy

Spatial Strategy – Our approach to managing growth and development within Harrow

Moving to a planned approach

.1 As Harrow grows and changes, the way in which we care for and manage our natural resources and local environment becomes a significant consideration in the way we manage and provide for different land uses. A common weakness of the former UDP was that it did not adequately address how existing residential areas will change as a consequence of infilling and redevelopment for housing, nor how the consequence of this change for social services, GP services, education or transport would be managed.

.2 This means that there has often been no *planned* approach to managing change in such areas. Rather, development control has had to try to cope on a purely responsive basis within overall national policy, often leading to serious delays in the provision of social infrastructure, or failure to make adequate provision for it at all, together with rising public opposition to growth. The spatial strategy for Harrow seeks to address these matters by focusing attention on the areas within the borough where opportunities exist for regeneration and development, and where there is also capacity to accommodate change.

.3 The area based objectives establish how an area is likely to change, and lead to core policies needed to steer development and produce the desired outcomes. This includes the provision of infrastructure of all kinds necessary to support the existing community and the new development.

.4 The long-term spatial strategy for Harrow is an ambitious but deliverable framework for how development and growth will be pro-actively managed and promoted within a newly defined Harrow and Wealdstone Intensification Area, within our district and local centres, and on strategic suburban brownfield sites and renewal areas located across the Borough.

.5 Having established that the central area will be a focus for major change, this will enable the Council to better manage development throughout the rest of the Borough through more natural growth. As noted elsewhere in this report, scope for change beyond the centre would continue to be provided in line with London Plan policies regarding density linked with public transport accessibility. However, the Core Strategy would acknowledge the significant character, environmental and heritage qualities that exist within our communities and seek to place greater emphasis on development that enhances and protects these qualities. In particular, policies will focus on strengthening the diverse role and functions of our district and local centres, place tighter controls on conversions and back garden development, and ensure that the design of development is in keeping with the surrounding built form.

The Harrow and Wealdstone Intensification Area

.6 The Intensification Area is recognised in the replacement London Plan as being a location that can accommodate change and has capacity to do so. In addition to making provision for new jobs and higher density residential and mixed use development, the Intensification Area also provides a focus for public and private investment in a competitive sub-regional market.

.7 Harrow Town Centre will strengthen its role as a prosperous Metropolitan centre, through increased retail, leisure, and hotel provision providing for a significant increase in local jobs. The current office stock will have undergone substantial consolidation and renewal, which along with improvements to the public realm and transport network will secure the town centre's long-term vitality. This will be aided further through the Council and our partners co-locating central and frontline services and facilities within Harrow Town Centre, making them more accessible to all residents and allowing the rationalisation of the public property portfolio.

.8 Wealdstone and Station Road will become the focus of regeneration efforts, providing for a substantial proportion of the Borough's future housing growth. Urban realm enhancements and the provision of mixed development will drive a new urban form and the intensification of employment use of industrial sites through the provision of appropriate premises and training to foster growth of Harrow's strong entrepreneurial small and medium enterprise sector (SME).

.9 The economic viability and vitality of smaller district and local centres will be promoted through selective and purposeful development and regeneration aimed at ensuring the immediate needs of the local community are provided for. Positive policy interventions will be used to manage vacancy rates, deliver improvements to the public realm and, where appropriate, reinforce and enhance the historic features that contribute to a centre's character and appeal.

District and Local Centres

.10 The focus on district and local centre development will be on managing core retail vacancy rates, which may require some enabling development. Other opportunities are for in-fill or edge of centre development that will need to be managed appropriately to ensure they add to and strengthen the role of the town centre. Suitable uses of such site would include supported accommodation, in line with accessibility to local services and good public transport. It is also envisaged that these developments will assist in delivering regeneration initiatives, including contributing towards much needed urban realm improvements within the centres within which they are located

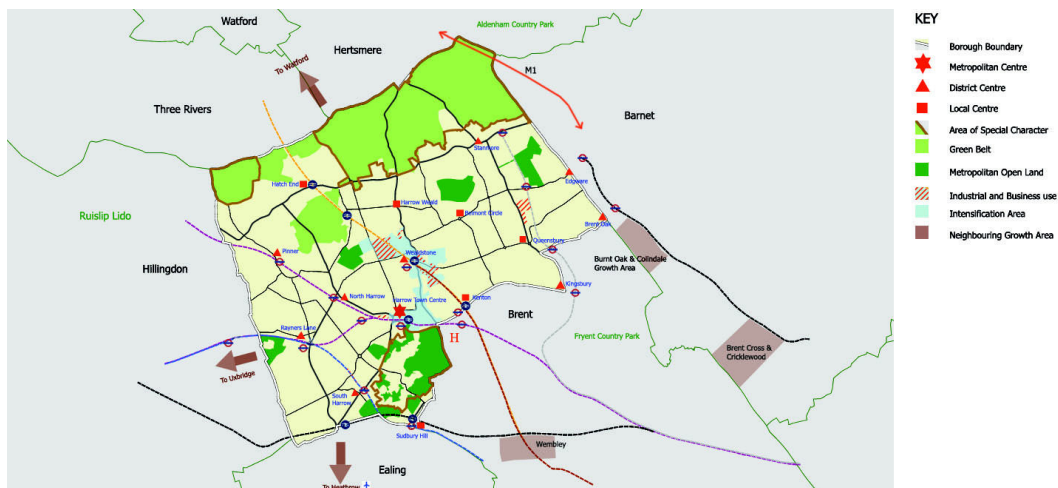
Strategic Brownfield Suburban Sites and Regeneration Areas

.11 There are a significant number of development opportunities located within existing suburban environments across the borough. Many of these sites are suited to a range of housing accommodation and offer significant potential to deliver family affordable housing in line with Harrow's identified need. These include a number of housing estates where opportunity exists to address issues of deprivation and create more mixed and balanced communities, such as that being achieved through the Rayners Lane Estate regeneration programme. It is envisaged that the development of these sites would contribute to local infrastructure improvements that would benefit new and existing communities, including enhancements to the quality of local parks, children's play space, community and leisure facilities (making these multiple use facilities), school refurbishment, and streetscape improvements. There are also sites identified for enabling development, where these offer the opportunity to secure new open space provision or sub-regionally important facilities, such as those provided at RHOH and RAF Bentley Priory. Where applicable, the larger schemes identified also offer the opportunity to look at reconfiguration of the amenity space and accessibility to tie in with borough wide initiatives associated with the Rights of Ways Strategy, Cycle Network or the Harrow Green Grid.

.12 In addition to the sites identified in the tables below, we also anticipate further sites to come forward over the plan period. In particular, the Core Strategy policy to consolidate Harrow's office sector offer in Harrow Town Centre, is likely to promote the conversion of redundant and long-standing vacant out of town centre offices to housing, especially where these are still well located in respect of public transport. Again this could be an important source of supported accommodation or alternatively, flatted affordable provision to meet the significant need for one and two bedroom homes identified in the SHMA.

.13 Elsewhere in the borough, development will be more constrained by the local context and the capacity of existing local infrastructure (e.g. transport) and services (e.g. schools, healthcare, leisure facilities and open space). The Council will not aim to maximise development in these locations and will not support attempts to over develop. We will however encourage and permit development that respects the local character and makes a positive contribution both aesthetically and to meeting social needs.

.14 In addition to the Intensification Area, the demand for new housing will be met on allocated strategic brownfield sites located within existing suburban neighbourhoods across the Borough. These sites, which include existing social housing estates, will achieve a mix of housing tenures, in particular, larger affordable family housing and housing that meets the need of vulnerable adults. Importantly, such development will lead to significant improvements in the quality of neighbourhoods. In addition to reinforcing the metroland attributes that make Harrow's suburban environment attractive and desirable places to live, contributions will be secured to deliver improvements to existing local infrastructure, such as local parks, play space, schools, libraries, civic spaces and streetscapes.



Harrow & Wealdstone Intensification Area

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Harrow & Wealdstone Intensification Area

Introduction

- .1 The Harrow and Wealdstone area comprises several distinct areas, displaying different characteristics, strengths and weaknesses, and diverse opportunities, as well as capacity for growth and change.
- .2 Harrow Town Centre, adjacent to the lower slopes of historic Harrow on the Hill, is the borough's main retail and office centre. It is designated as a Metropolitan centre - one of the 12 such centres across London - but is one of the smallest and is increasingly faced with competition from nearby centres such as Brent Cross, Watford, Uxbridge and White City.
- .3 Since the late 1980s, when Tesco's and the two shopping centres (St George's and St Ann's) were built, the centre has not seen any significant new retail development. The most recent Retail Study (2009) indicates that the shopping offer is below that of other Metropolitan centres, and the quality of national multiples is relatively poor. It also suggest that the centre has a relatively small catchment area given its Metropolitan centre status and the relative affluence of the area. Despite this, vacancy rates in the town centre have remained relatively low, even in times of economic downturn.
- .4 With regard to the centre's office offer, much of this was built in the 1970s and 80s with very little developed since. Most of the larger office buildings were provided around this time to accommodate public and private-sector single occupiers, most of whom have now left the Borough. These offices have since proved extremely difficult to let, even following refurbishment, due to their poor specification, low levels of car parking, and the fact that they are not easily sub-dividable into smaller units more suited to meeting local office needs. As a result, office vacancy levels within the town centre are high, which in turn is keeping rents low and preventing new speculative office development from coming forward. Such site are therefore coming under increased pressure for release for intensive residential development.
- .5 Transport - serverence to connecting the town centre to the Harrow College campus and Harrow Hill. Parts of the centre, away from the primary core, exhibit lower levels of environmental quality
- .6 Wealdstone is a predominantly Victorian suburb of mixed land use character, comprising large scale business uses such as Kodak, a range of other industrial estates of varying ages and condition, a declining District Centre, Victorian terraces, 1930s housing and pockets of new flatted development, and the Council's main Leisure Centre.
- .7 Station Road (the A409) links the two centres in a linear "corridor, and includes, amongst other things, the Civic Centre and Harrow Central Mosque.
- .8 The area is served by two railway stations, Harrow and Wealdstone and Harrow on the Hill, which provide fast services to central London and areas to the north.
- .9 Very low density, even when compared with other parts of the Borough.
- .10 Given the existing high public transport accessibility of the area, the need to strengthen Harrow Town Centre's role as a Metropolitan centre within London, the new Intensification Area offers a significant opportunity for urban renewal and intensification, providing the impetus to

regenerate Wealdstone and rejuvenate Harrow town centre. Capacity exists to deliver substantial employment growth through an uplift in retail, office and hotel development within the town centres and the intensification of industrial and other business use within the Wealdstone Industrial Area. There is also scope to accommodate a substantial portion of the Borough's future housing need through the delivery of higher density residential and mixed use development on key strategic sites and renewal areas where development is matched by investment in infrastructure and achieves high standards of design and sustainability. The Intensification Area offers a significant opportunity for urban renewal and intensification, providing the impetus to regenerate Wealdstone and rejuvenate Harrow town centre. Capacity exists to deliver substantial employment growth through an uplift in retail, office and hotel development within the town centres and the intensification of industrial and other business use within the Wealdstone Industrial Area. There is also scope to accommodate a substantial portion of the Borough's future housing need through the delivery of higher density residential and mixed use development on key strategic sites and renewal areas where development is matched by investment in infrastructure and achieves high standards of design and sustainability.

Statement 1

Area Objectives [Needs Review]

- Increase the Borough's 'visibility' within sub-regional and regional context to The potential to maximise funding for other services and infrastructure by increasing funding bodies in the sub region and maximising planning obligations through improved
- Greater potential for intensification of employment uses within designated and non-designated strategic industrial and employment sites;
- The redevelopment of and extension to existing social services within a growth corridor which would be highly accessible to new and existing residents;
- Secure public and private funding to deliver improvements to the quality and capacity of public transport serving the Intensification Area, in particular, step free access at Harrow-on-the-Hill train station and the redevelopment of Harrow bus station
- The potential to generate funding from sources for ;
 - up-skilling and re-skilling of local residents
 - keeping Harrow's large employers in the area to maintain their employment
 - supporting the creation of new businesses as well as more established SMEs to provide future jobs in the local economy
 - improving the quality of employment land, and buildings
 - promoting and securing investment in the Intensification Area including Harrow town centre
 - improving traffic flow and reducing congestion
 - ensuring public transport links to employment opportunities outside the area are maintained and enhanced
 - need to maintain business/employment base in borough despite pressure for redevelopment of (increasingly outdated) employment sites and buildings.

ensure that higher earning residents contribute to the local economy through spending within the Borough (rather than outside e.g. shopping in Watford, Brent Cross, West End).

the provision of [insert critical infrastructure here];

- the retention and regeneration of the Wealdstone Preferred Industrial Location and focusing office space renewal within Harrow town centre;
- the accommodation of a minimum of 2,500 sustainable new homes;
- the management and reduction of flood risk; [more specific?]
- the provision of leisure, hotel and retail development within Harrow town centre;
- the retention and management of Metropolitan Open Land and other open space; [more specific?]
- incremental and long-term sustainable transport capacity and accessibility improvements; [more specific?] and
- the development of an appropriate coherent new character.

Policy CS 1

Harrow and Wealdstone

Harrow & Wealdstone Intensification Area

The Council will actively market and promote the Harrow and Wealdstone Intensification Area as a focus for significant development, growth and investment.

Development within the Intensification Area will contribute to the formation of a coherent, high quality and sustainable urban environment. An Area Action Plan will set out the appropriate general building heights and identify any suitable locations for tall, landmark buildings, paying special attention to the setting of Harrow-on-the-Hill Area of Special Character and heritage assets. Identified views of St. Mary's Church and Harrow Weald Ridge will be protected.

The Wealdstone Preferred Industrial Location will be retained principally for business (B1), general industry (B2) and warehousing (B8) uses, and for other non town centre uses which contribute to economic development. Appropriate mixed-use development which contributes to the regeneration of sites within the Preferred Industrial Location and the provision of [affordable] premises for small & medium sized enterprises will be supported. [amplify in RJ what appropriate means - i.e could include housing where part of a reasonable balance which retains the overall economic value of the site and does not sterilise the site for unneighbourly economic uses]

The Area Action Plan will allocate sites and policies for the delivery of a minimum of 2,500 homes on previously developed sites within the Intensification Area. Proposals for ten or more dwellings will be required to provide [50% or the maximum viable?] of the [dwellings or floorspace?] as affordable homes, taking into account the size and form of the homes required and the priority to be given to the delivery of other infrastructure requirements.

Sites suitable for major comparison goods retail development, within or as an extension to the primary shopping area in Harrow Metropolitan centre, will be brought forward through the Area Action Plan. Convenience goods retail development, and other main town centre uses, will be directed to Harrow Metropolitan centre or Wealdstone district centre commensurate with the catchment and function of the centre. Uses that support the development of an evening economy within Harrow Metropolitan centre will be supported, subject to compatibility with the residential environment.

Between Harrow Metropolitan centre and Wealdstone district centre, active commercial frontages will be sought at ground floor level on Station Road to include provision for economic development that is compatible with residential use. Main town centre uses between the centres in Station Road will be limited to re-provision of existing floorspace and extensions not exceeding 200 square metres.

Rejuvenation of the Borough's office market will focus upon Harrow Metropolitan centre. Mixed-use development within the centre will make provision for the renewal of office floorspace to meet the needs of the local market and to contribute to modest net growth by 2026.

Accessibility and capacity improvements at Harrow-on-the-Hill Underground Station and Harrow Bus Station will be sought in the longer term. Where specific proposals for such improvements come forward, contributions towards delivery will be sought from major development within the Intensification Area.

Proposals for the sustainable enhancement of the public realm within the Intensification Area will be brought forward as part of an Area Action Plan. The proposals will enhance legibility and accessibility to support walking and cycling across the area. Highway improvements that improve the capacity, reliability and general operating conditions for public transport will be prioritised. Within the town centres, non-residential development of more than local or district catchment will support general car parking provision consistent with the vitality and viability of the centre. Other development will be expected to provide minimal car parking, consistent with operational requirements and standards for disabled people

Reducing office vacancy levels and maintaining a viable office market within Harrow Town Centre is essential to support the borough's local economy. The Council will encourage the redevelopment of the older office stock within the Town Centre where this has remained vacant for a significant period despite refurbishment efforts and extensive marketing. Redevelopment to mixed use will be supported where this re-provides not less than 40% (gross) of the existing B1 floorspace in new office provision on the site, maintains an active employment frontage at the ground floor, and provides a range of office sizes, including smaller spaces suitable for small and start-up businesses.

Links will be encouraged between the Harrow Town Centre, Harrow College Campus and Harrow Hill, to contribute to the wider commercial and tourism opportunities in the area.

Co-ordinated and comprehensive redevelopment of the individual industrial estates that make up the Wealdstone SIL will be supported to provide employment led mixed-use developments of housing, employment (office, light industrial, storage and distribution), leisure retail and industrial estates that comprise the Wealdstone SIL will only be considered acceptable where this will result in a change of use or mixed use development promoting a component of non-employment use, .

The Intensification Area is the only area in the Borough where a tall building would be considered an appropriate feature in the local context. The Area Action Plan will establish the context, development management policies and identify the sites that will be considered suitable for locating a tall building.

Provide a co-ordinated and comprehensive scheme that does not prejudice the development of adjoining land;

Throughout Harrow and Wealdstone

There will be a presumption against any net loss of open space. The boundaries, strategic function and character of Metropolitan Open Land will be maintained. Inappropriate uses and development of Metropolitan Open Land and other open space will be resisted. Sites of Importance for Nature Conservation will be protected as appropriate to their classification and will be kept under review. Green Grid projects which improve links to and within the Green Belt, and which restore and improve access to the Western Rivers and the River Brent, will be prioritised.

Harrow and Wealdstone's heritage assets, comprising its listed buildings, will be preserved and enhanced.

The Council will apply the sequential and, where appropriate, exception tests to the allocation of development sites and to development proposals. Development will be managed with the aim of achieving an overall reduction in flood risk and to increase resilience to flood events. The capacity of the functional floodplain within greenfield sites will be maintained and opportunities to enhance or re-instate the functional flood plain on previously-developed sites will be sought. River restoration and deculverting projects should achieve integrated flood management, biodiversity and where appropriate public access benefits.

A Leisure Centre providing comprehensive indoor sport facilities for the Borough will be retained within Harrow and Wealdstone. Opportunities for enhancement of facilities will focus on increased sport hall capacity and qualitative improvement. The capacity of existing swimming pool provision will be safeguarded.

All development will be required to make provision for playspace, with the presumption in favour of on-site provision. Where there are opportunities for additional open space on sites, priority will be given to pocket parks and amenity greenspaces. Continued community access to existing public and private facilities will be supported, and opportunities for increased access will be sought. Investment to address other deficiencies in open space provision will focus upon projects which enhance the accessibility, quality and value of existing sites; contributions towards such investment will be sought through a Community Infrastructure Levy.

Proposals for ten or more dwellings will be required to provide [50% or the maximum viable?] of the [dwellings or floorspace?] as affordable homes, taking into account the size and form of the homes required and the priority to be given to the delivery of other infrastructure requirements.

Within the existing active frontages of non-town centre retail parades at Pinner Road and Headstone Drive/The Quadrant/Harrow View, retail and other appropriate commercial or community uses will be retained at ground floor level.

Outside of the Intensification Area, redevelopment and infill opportunities will be expected to reflect scale, pattern and appearance of the site's surroundings. Development on back gardens will be resisted, reflecting their contribution to the character of residential areas and as an environmental resource.

Priority will be given to transport investment which addresses the capacity of the Kenton Road/Sheepcote Road/Watford Road and the Headstone Road/Harrow View junctions. The provision of car parking will be managed to ensure that new development supports a modal shift from private car use to more sustainable modes.

All development will be required to contribute to the delivery of strategic infrastructure in accordance with the Borough's Community Infrastructure Levy charging schedule. [say something here about specific infrastructure needed in the sub area based on borough/infrastructure delivery plans and LIP]. Provision for contributions or other requirements specific to the site or proposal will be expected to be made through a s.106 Planning Obligation.

Reasoned Justification

- .11** The designation and delivery of an opportunity or intensification area in Harrow can help to achieve significant social and economic objectives. In particular, potential for intensive mixed-use housing led regeneration, to support office renewal and some retail growth in Harrow town centre could help to renew and sustain its role as one of London's metropolitan centres. In Wealdstone, housing led regeneration could support much needed physical renewal of the High Street and enhance the links with the wider business and industrial capacity of the area. Within the corridor itself, there is potential to strengthen links to our green spaces, create a more attractive and welcoming public realm and deliver a more sustainable urban community, including a mix of high quality built form, potential for CHP network and other community wide sustainability measures.
- .12** The HWIA encompasses the Metropolitan Centre of Harrow, including Harrow on the Hill station. Reflecting the aspiration to bring prosperity to the town centre of Wealdstone, improve its linkages with the strategic employment site occupied by Kodak and building upon the connectivity provided by Harrow and Wealdstone Station, the northern end of the intensification corridor includes some XX hectares of land identified for redevelopment alongside bus and rail access.
- .13** Connecting to Harrow's metropolitan town centre, via "station road" significant opportunities along the corridor exist to re-engineer and re-develop at medium to higher densities consistent with the accessibility and urban form of the area to provide both improved urban quality, public transport connectivity and homes and jobs that support and re-enforce the established cultural, retail and employment offers of the Harrow and Wealdstone town Centres.
- .14** Within Harrow town centre, the opportunity to increase the number of residents through re-development to provide new homes, public sector services and educational and cultural facilities, will be aligned to focused improvements to bus and rail interchange around Harrow on the Hill station and public realm renewal to create a safe, attractive economically vibrant but diverse day and night time economy.
- .15** Connecting this growth corridor to high quality open space, formal and informal leisure opportunities will involve capitalising on the existing, fragmented green grid through a programme of public and private sector projects, to create links and nodes around which biodiversity and well-being agendas can be delivered
- .16** In order to meet the vision and objectives for the IA we need to be pro-active in marketing the area and encouraging investment. Otherwise there is a risk that development will not come forward at the scale and pace needed to drive new retail and office demand, to strengthen the local economy, to make the local housing market more accessible and affordable, to provide the facilities that people need, and to deliver other regeneration initiatives required to improve the environment and create a place that fosters community pride. Whilst care needs to be taken to manage sustained and co-ordinated growth, constraining such growth is not desirable or realistic

since this would mean that many of the unused or underused strategic sites identified in the IA would not be brought forward for beneficial development and could harm opportunities to see all areas of the IA regenerated.

.17 The Harrow Characterisation Study has assessed whether a tall building would be an appropriate feature in the local context and identifies the Intensification Area as the only appropriate location within the Borough reflecting both its current built provision and the existing presents of a number of taller buildings. However, it also acknowledges the any tall building within the IA will necessarily need to have regard to the historic setting of Harrow Hill and key features within that skyline, including the St Mary's spire.

.18 retail/leisure mixed use development. This would be likely to entail a net loss of overall office stock and partial renewal on the more

.19 that does not prejudice the development of adjoining land

.20 Harrow and Wealdstone falls within the central sub area of the 2010 PPG 17 Study. The Study identifies a shortfall in the sub area of 67.13 hectares open space in 2010, projected to rise to 67.20 hectares in 2026, based upon recommended standards of provision per 1,000 population. The comparable shortfall for the Borough as a whole stands at 117.38 hectares and is projected to rise to 133.76 hectares by 2026. For this reason, and in recognition of the wider sustainability role that open space plays within the urban environment⁰, all open space will be safeguarded and opportunities to increase it will be sought.

.21 Harrow Leisure Centre is located within the Harrow and Wealdstone area and serves both the immediate area and the Borough as a whole. In addition to its sport halls and swimming pools, facilities for indoor bowls, indoor tennis and gymnastics are provided on the site, and parts of the complex are currently disused. A planning application to redevelop the Leisure Centre has now been withdrawn, but it is anticipated that investment to enhance or replace facilities will be required over the life of the Plan. The capacity of existing swimming pool provision should be maintained and opportunities to increase the capacity of sports hall provision will be sought within the Intensification Area.

.22 Increased access to outdoor pitches will be required to meet the needs of population growth within the Intensification Area and to encourage increased participation in sport. Community access to school playing fields and open space at Harrow's Teachers' Centre will be sought, and qualitative improvements on existing sites may offer further potential to increase capacity. Opportunities for investment to provide an additional multi-use games area should focus on the Weladstone area.

.23 The Belmont Trail group of Green Grid projects will enhance accessibility between the Harrow and Wealdstone area and natural & semi-natural greenspace located in the north-east part of the Borough. These projects should make provision increased access to nature along the route of the trail. Wealdstone Cemetery, adjacent to the Belmont Trail and Byron recreation Ground, is identified as a low value but low quality site; sensitive investment which enhances its value by use as an accessible natural and semi-natural greenspace should be considered.

notably for biodiversity, natural drainage and flood storage, mitigation of air, light and noise pollution, and for general human health and wellbeing

.24 Allotments will continue to meet the needs of local residents in Harrow and Wealdstone, and of the Borough as a whole. Investment should focus on improvement to the quality and value of the Richards Close site. Any site no longer required for allotment gardening over the plan period will be safeguarded to address the shortfall in accessible natural and semi-natural greenspace.

.25 The PPG 17 Study identifies the highest concentration of civic space with the Harrow and Wealdstone area, and these are found to be of variable quality and value. Opportunities to enhance provision will be explored through the Area Action Plan for the Harrow & Wealdstone Intensification Area.

.26 Throughout the area there is a high deficiency of pocket and small parks, play space and amenity greenspace. New development will be expected to make on-site provision for children's play and, where appropriate, contribute to the provision of parks and amenity greenspace. Green Grid projects which enhance access between the four main recreation grounds serving the central area⁰ will be prioritised, with particular attention to be paid to the environmental quality of access points across the West Coast Main line (a major physical barrier through the area). Opportunities to promote facilities at Kenton and Byron Recreation Grounds will also be sought. Enhancement of facilities at Headstone Manor Recreation Ground should focus on fulfilling the site's potential to provide youth space.

.27 Detailed requirements for open space provision and contributions, informed by the 2010 Study, will be set out in development management policies, site allocations and a Community Infrastructure Levy as appropriate.

Box 2

Delivery

In view of the level of change anticipated, and its potential to deliver upon a range of strategic objectives associated with urban renewal, both the Council and the Greater London Authority (GLA) have agreed to prepare and implement a joint Area Action Plan (AAP) to provide the robust plan-led framework needed to deliver and manage future development of the Intensification Area. The boundary of the Intensification Area will be established through the Area Action Plan, which will also allocate sites and contain development management policies specific to the area.

Monitoring

Harrow-on-the-Hill and Sudbury Hill

Draft Core Strategy (Pre-Submission) for O&S

Harrow-on-the-Hill and Sudbury Hill

Introduction

.1 Harrow Hill contains the Borough's highest concentration of listed buildings and many of its areas benefit from Conservation Area status. The extent of the medieval village of Harrow is identified by an archaeological priority area. The present day hilltop settlement is enveloped by open space which survived the suburban sprawl of the 20th Century, and this space is now of strategic significance expressed through its Metropolitan Open Land designation. On the eastern slopes of the Hill, the grounds of Harrow Park are recognised as a grade II historic park and garden.

.2 Together, these designations reflect that Harrow Hill is a feature of significant cultural and historic importance to the Borough and will continue to be recognised as an Area of Special Character. Harrow Hill is not expected to accommodate further development, other than that which might be required to maintain active use of its historic buildings and to support the continued operation of Harrow School and John Lyon School. Rather, the strategy for Harrow-on-the-Hill will be the protection, preservation and enhancement of its special character and heritage assets. Pursuant to this strategy, the boundaries, strategic function and character of Metropolitan Open Land will be maintained.

.3 As well as its strategically important role to the character and setting of Harrow Hill, parts of the Metropolitan Open Land are also grade I Borough sites of importance for nature conservation providing a range of habitats. The Council will work with landowners to protect and manage these habitats in accordance with Harrow's Biodiversity Action Plan.

.4 The Capital Ring walking route provides public access through parts of Harrow-on-the-Hill's Metropolitan Open Land and will form a strategic connection between Harrow's Green Grid and those of neighbouring boroughs. The Council will pursue Green Grid projects which strengthen and enhance this connectivity.

.5 St. Mary's Church remains the dominant visual feature atop Harrow Hill and is a permanent reminder of the influence once exerted by Harrow village over the surrounding community. Views and glimpses of St. Mary's Church make a valuable contribution to the quality and identity of places within the Borough, and a number of important public views of the Church have been identified. These identified views will be retained and safeguarded.

.6 Harrow-on-the-Hill is a visitor attraction both in its own right and as the home of historic Harrow School. Its continued role as a visitor destination will be supported, but sensitive enhancement of pedestrian connectivity between Harrow-on-the-Hill and Harrow town centre will be sought to improve the relationship between the two places and extend visitors' experience of the Borough.

.7 Sudbury Hill centre is a small local centre of Metropolitan Open Land parades which extends southwards along Greenford Road into the London Borough of Ealing. The centre is served by the London Underground Piccadilly line and by the Chiltern line to London Marylebone. A key feature of the centre is the grade II listed Sudbury Hill Underground Station, which dates from 1931 and is the first to be built of the iconic modernist stations on the line. Investment in the public realm of Sudbury Hill local centre will be co-ordinated to support its attractiveness as a local shopping destination and to enhance the setting of the listed station building.

.8 The Northolt Road business use area provides a continuation of commercial activity north of South Harrow district centre and Underground Station. Historically an office location, in more recent years the business use area has seen diversification through redevelopment and conversion for residential and hotel uses. Continued diversification of the business use area is anticipated as the Borough's main office market consolidates in Harrow town centre. Balanced diversification which includes a mix of economic (excluding main town centre) uses and residential will be sought.

.9 A small retail park and the Brember Road industrial estate, to the rear of the Northolt Road business use area, contribute to the diversity of economic activity in this area. The industrial area has been partially redeveloped for high density residential use, and the remaining units have been assessed as of moderate-low quality. Nevertheless, the Brember estate contributes to the capacity and range of traditional employment space in the Borough. Further diversification will be managed positively to safeguard the economic value of the site.

.10 Within the sub area Harrow School, John Lyon School and new facilities at Whitmore High School provide valuable community access to facilities for sport and recreation, and this is welcomed. Sensitive enhancement of sport and recreation facilities which improve and extend community access will be supported. To prevent any exacerbation of an existing Borough wide deficiency there will be no net loss of open space, irrespective of ownership or function.

.11 At Grange Farm estate, to the rear of the Northolt Road business use area, experimental 'resiform' construction development is reaching the end of its useful life and opportunities for estate renewal will be welcomed. Throughout the rest of the area, redevelopment will be managed to safeguard local character and non-designated heritage, and there will be a presumption against development on back gardens.

Box 1

Objectives for Harrow-on-the-Hill and Sudbury Hill

1. To safeguard the special character of Harrow-on-the-Hill and its setting
2. To resist any loss of Metropolitan Open Land and safeguard its strategic value
3. To protect and manage Harrow-on-the-Hill's sites of nature conservation importance
4. To strengthen and enhance connectivity with the Capital Ring
5. To safeguard identified views of St. Mary's Church
6. To enhance pedestrian connectivity between Harrow-on-the-Hill and Harrow town centre
7. To improve the public realm of Sudbury Hill local centre by co-ordinating investment
8. To secure balanced diversification of the Northolt Road business use area
9. To safeguard Brember Road industrial estate as a location for economic development
10. To maintain community access to sport and recreation facilities and encourage enhancement
11. To retain all forms of open space in the area
12. To support opportunities for the renewal of Grange Farm Estate
13. To retain the character of the area's suburbs
14. To resist development of back gardens in the area

.12 Additional para here?

Policy CS 2

Core Policy 2: Harrow-on-the-Hill and Sudbury Hill

1. Development will be managed to maintain the special character of Harrow-on-the-Hill and its setting. Sensitive uses and alterations which secure investment and safeguard the future of listed buildings will be supported. The character and appearance of Harrow Hill's Conservation Areas will be preserved and enhanced in accordance with the management strategies for the area. Criteria for the assessment of impacts on other heritage assets will be provided.
2. The boundaries, strategic function and character of Metropolitan Open Land will be maintained. Proposals for inappropriate uses and development of Metropolitan Open Land will be resisted.
3. The Council will work with owners/occupiers of sites of nature conservation importance to implement the actions of the Biodiversity Action Plan.
4. The Capital Ring strategic walking route and local public rights of way will be safeguarded and, where opportunities arise, be enhanced as part of the Borough's Green Grid projects.
5. St. Mary's Church will continue to be recognised as an important landmark and identified views of the Church will be safeguarded by management of building heights through the Area Action Plan for the Harrow & Wealdstone Intensification Area.
6. Opportunities to enhance pedestrian connectivity between Harrow-on-the-Hill and Harrow town centre will be sought by the co-ordination of public realm investment and the identification of opportunities through the Area Action Plan for the Harrow & Wealdstone Intensification Area.
7. Opportunities to enhance the environmental quality of Sudbury Hill local centre, consistent with its Metroland character and the setting of Sudbury Hill Underground Station, will be sought by the co-ordination of public realm investment.
8. Proposals within the Northolt Road business use area for mixed-use redevelopment or conversions which make provision of appropriate economic diversification employment generating uses will be supported.
9. Proposals within the Brember Road industrial estate for redevelopment or changes of use which secure economic diversification and employment will be supported.
10. The Council will work with institutions where necessary to support public access to sport and recreation facilities. Appropriate proposals for enhancement of such facilities will be supported.
11. Proposals involving the loss of open space, or for inappropriate uses or development, will be resisted.
12. The Council will support proposals which achieve physical renewal and estate regeneration objectives at Grange Farm.

13. Proposals which would harm the character of suburban areas and back garden development will be resisted.
14. The redevelopment of identified, previously developed sites to collectively contribute at least 212 homes towards the Borough's housing allocation, set out in the London Plan, will be encouraged. [no supporting objective for this one]

Reasoned Justification

.13 The Harrow-on-the-Hill Area of Special Character designation was originally defined in the Harrow Borough Local Plan (1986) "...having regard to the architectural and historic character of the area and the open land which provides setting and views of the hilltop settlement, inclusion of all of the Hill's conservation areas and significant open spaces around the Hill". The designation was carried forward and incorporated into the Harrow Unitary Development Plan (1994) and again into the replacement Harrow Unitary Development Plan (2004). The characteristics of Harrow Hill which make it a special area, in terms of its historical and environmental significance to the Borough, remain valid and equally important today; the Area of Special Character incorporates a grade ?? historic park and garden, ?? conservation areas, ?? listed buildings and ?/ hectares of Metropolitan Open Land. For these reasons the continuation of this strategic designation is merited.

.14 Harrow-on-the-Hill is also of cultural and economic importance. The spire of St. Mary's Church is visible from a number of identified viewpoints throughout the Borough and the historic fabric of the Hill is an important visitor asset for local tourism. Many of the Hill's historic buildings and open spaces are used and maintained by Harrow School and John Lyon School, whose association with Harrow Hill goes back ?? years, and whose continued and viable presence in the area will be crucial to the preservation of the Area of Special Character. The Clementine Churchill Hospital is a major employer which occupies a large site within Metropolitan Open Land on the southern slope of the Hill.

.15 Irrespective of ownership, use, public accessibility and condition, all open space has an intrinsic value and will therefore be protected in quantitative terms. The Metropolitan Open Land within and surrounding Harrow Hill is of strategic importance and continues to comply with the relevant criteria for designation, and will therefore be retained. As much of this is in private ownership and use, the opportunity provided by the Capital Ring strategic walking route and other public rights of way are crucial for general public access and will therefore be protected. Where opportunities for enhancement of public access to the Metropolitan Open Land arise, these will be pursued as part of the Borough's Green Grid.

.16 Harrow-on-the-Hill and Sudbury fall within the south-west sub area of the 2010 PPG 17 Study. The Study identifies a shortfall in the sub area of 52.48 hectares open space in 2010, projected to rise to 60.52 hectares in 2026, based upon recommended standards of provision per 1,000 population. The comparable shortfall for the Borough as a whole stands at 117.38 hectares and is projected to rise to 133.76 hectares by 2026. For this reason, and in recognition of the wider sustainability role that open space plays within the urban environment⁰, all open space will be safeguarded and opportunities to increase it will be sought.

notably for biodiversity, natural drainage and flood storage, mitigation of air, light and noise pollution, and for general human health and wellbeing

.17 Within Harrow-on-the-Hill and Sudbury valuable community access to indoor and outdoor sport facilities is provided by Harrow School, John Lyon School and Whitmore High School. Opportunities to increase provision through enhanced community access to other private [including candidate site at Roxeth] and school facilities, and to increase the capacity of existing publicly accessible facilities, will be sought.

.18 Assessment of accessibility deficiency indicates that where new open space is being created as part of development, priority should be given to the provision of small public open spaces, playspace and amenity greenspace. Allotments will continue to meet the needs of local residents in the south-west sub area and the Borough as a whole; any site no longer required for allotment gardening over the plan period will be safeguarded to to address the shortfall in accessible natural and semi-natural greenspace.

.19 Detailed requirements for open space provision and contributions, informed by the 2010 Study, will be set out in development management policies, site allocations and a Community Infrastructure Levy as appropriate.

.20 Harrow's Housing Trajectory demonstrates capacity to provide [212] net additional homes on identified, previously developed sites within the Harrow-on-the-Hill and Sudbury Hill neighbourhood area, over the period 2009-2026. Additional housing capacity will be sought from unforeseen opportunities on previously developed sites within Sudbury Hill local centre and Northolt Road [business use] area. The West London Strategic Housing Market Assessment demonstrates a requirement for [??] affordable homes across the sub-region and for [??] within the London Borough of Harrow. [something here about the conclusions of the viability assessment]. To ensure that all sites above the London Plan threshold of ten or more dwellings contributes to the delivery of the Borough's minimum requirement, or helps to exceed it, the maximum viable number of dwellings up to 50% of all the dwellings proposed on the site will be sought as affordable homes. [something here about the tenure and size mix][anything to add here that shows the level of need within the sub area/any specific requirements??]

.21 Harrow's Retail Study (2009) projects a modest increase of small convenience store floorspace over the period 2009-2026. In recognising the growth of service uses in recent years and the role that these can play in supporting overall town centre vitality and viability, the Study also recommends provision be made for A2, A3, A4 and A5 uses over the same period. As a local centre Sudbury Hill has a modest role within the town centre hierarchy, providing mainly convenience shops and other services for the immediate locality. The redevelopment of sites within Sudbury Hill Local Centre will be required to re-provide viable premises for retail and A2-A5 uses at ground floor. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the status of Sudbury Hill as a local centre and any potential impact upon other centres within the Borough.

.22 Outside of town centres, the provision of local retail and associated service or community uses help to sustain the neighbourhoods in which they are situated by providing 'walk-to' convenience shopping and services, and particularly for more specialist businesses which might be uneconomic in town centres. For this reason, ground floor commercial premises at Shaftesbury Circle [add addresses as footnote] and within the core shopping area of Harrow-on-the-Hill village [add addresses as footnote] will be retained for retail and appropriate service and community uses. The core shopping area of Harrow-on-the-Hill is recognised as part of the village's special character and therefore additional considerations will apply to changes of use in this area, as set out in the supplementary planning document for the conservation area.

.23 Harrow's Employment Land Study (2010) forecasts an overall contraction in traditional 'B' class employment floorspace but a net increase in office space over the period 2007-2026. Large office buildings constructed in the 1970s and 80s for single occupiers have become unsuited to the needs of the local economy and low office rents have resulted in a very limited supply of new space. Harrow town centre is the focus to provide a new, consolidated office market within the Borough. The mixed-use redevelopment or conversion of redundant office buildings in the Northolt Road business use area therefore offers the opportunity to contribute to housing supply, but should also make provision for appropriate economic uses (excluding main town centre uses) equivalent in value to the number of jobs previously supported on the site. Appropriate community uses may also be supported where the benefit of the use outweighs the loss of an employment generating use.

.24 Harrow's suburban areas are a cherished part of the Borough's character and heritage, with many areas displaying strong coherence in design, proportions and pattern of development. The Character Assessment of Harrow's Residential Areas (2010) identifies within the residential suburbs of the Harrow-on-the-Hill and Sudbury Hill sub area estates of traditional inter-war housing, post-war infill development including pockets of 'mock Georgian' housing, and areas of more mixed character such as Greenford Road and Brook Avenue/South Hill Avenue. When development opportunities arise in suburban areas, substantial weight will be given to the wider setting of the site in determining the appropriate density, scale and form of development. These considerations will also apply to proposals for domestic development. A residential design guide has been published, as a supplementary planning document, which amplifies the appropriate considerations and detailed requirements.

.25 As with other forms of open space, gardens and allotments have a multiplicity of social and environmental benefits, including their positive impact on health and wellbeing, the opportunity for sustainable food production and natural drainage, and as a habitat for biodiversity. Harrow's Biodiversity Action Plan recognises the importance of allotments and gardens in the continued survival of species and habitats, and identifies among other threats the loss of these spaces to development. Amendments to PPS 3 excludes back gardens and allotments from the definition of 'previously developed land' and the London Plan makes provision for LDFs to introduce a presumption against development on back gardens. Harrow's housing trajectory identifies sufficient previously-developed sites to meet the Borough's housing target and policies within this strategy allow for other sites to be brought forward in strategically preferable locations. Development of designated open space (including allotments) and back gardens is therefore strategically unnecessary and will be resisted.

.26 Household car ownership across the Harrow-on-the-Hill and Sudbury Hill sub area is generally high, although within the sub area those neighbourhoods closest to public transport nodes have slightly lower proportions of households with at least one car or van. The high level of car ownership across the Borough means that encouraging car owners to change their mode of transport to a more sustainable form such as public transport or, particularly for shorter trips cycling and walking, is a significant challenge. The London Plan sets out maximum parking standards and these will be applied, alongside the spatial co-ordination of development with public transport accessibility and services set out in this strategy, to encourage a more sustainable lifestyle.

.27 The Community Infrastructure Levy Regulations enable local planning authorities to collect from individual developments financial contributions towards infrastructure made necessary by development across the Borough. Infrastructure requirements have been assessed and identified in the Council's Infrastructure Delivery Plan incorporating relevant provisions from the Borough

Investment Plan for housing and the Local Implementation Plan for Transport, as well as specific requirements arising from the Biodiversity Action Plan, the management strategies for specific conservation areas, and the documented needs of other community service providers such as the Harrow NHS. The Council will publish a CIL charging schedule following the adoption of this Core Strategy. In accordance with the Regulations, where a specific requirement arises from a particular site or development proposal, this should be provided-for by a Planning Obligation.

Statement of Delivery Mechanisms 1

The Development Management Policies DPD will ensure that development proposals which give effect to and ensure that development or uses do not harm the Area of Special Character, the continued protection of Metropolitan Open Land and other open space, and will re-affirm and safeguard important local views. Where needed to supplement the existing development management provisions of national planning policies and the London Plan, policies will also set out criteria for the assessment of proposals relating to biodiversity and nature conservation, listed buildings, conservation areas, historic parks and gardens, archaeological priority areas, economic development, the management of employment land, town centre uses and town centre vitality and viability, the design and layout of development, and the protection to be afforded to back gardens.

Development Management Policies will be amplified where appropriate by supplementary planning documents. These will include the Harrow-on-the-Hill Conservation Areas SPD (and associated character appraisals and management strategies).

The Harrow & Wealdstone Area Action Plan will provide an appropriate framework to manage building heights and if appropriate may identify suitable sites or locations for tall buildings, where these are consistent with the protection of identified views. The AAP will also identify opportunities to masterplan the Intensification Area to achieve improved linkages with Harrow Hill.

The Site Allocation DPD will identify previously-developed sites for housing and may also highlight the potential for renewal through redevelopment of the Grange Farm Estate.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to deliver the projects and other actions set out in Harrow's Biodiversity Action Plan and Green Grid. A replacement Cultural Strategy and Open Spaces Strategy will be prepared and this will include opportunities to work with partner organisations in connection with the delivery of sport, recreation, leisure and open spaces.

The Council will review the Borough Investment Plan and continue to work with the Homes and Communities Agency [now GLA?] to encourage renewal at Grange Farm Estate.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to achieve co-ordinated improvements within the public realm.

South Harrow

Draft Core Strategy (Pre-Submission) for O&S

South Harrow

Introduction

- .1 South Harrow is a vibrant district centre which developed along Northolt Road following the extension of what is now the London Underground Piccadilly line to the area in 1903. The centre fulfils an important convenience shopping role with representation by national multiple food retailers and small independent outlets. Northolt Road, part of the London distributor network, carried high volumes of traffic through the centre and the environmental quality is assessed as being poor. Investment in the public realm of South Harrow district centre will be co-ordinated to support its attractiveness as a district shopping destination and to enhance the setting of the listed station building.
- .2 The subsequent extension of what is now the Piccadilly line over the lowlands west of Harrow Hill necessitated the construction of a viaduct which remains a dominant visual feature and provides valuable arches accommodation for business and industrial activity. The industrial use area has been assessed as of low quality but nevertheless fulfils a local economic need and will be safeguarded; opportunities to enhance the parking and access arrangements will be sought. The business use units have recently been refurbished to provide modern office/studio accommodation and will also be safeguarded.
- .3 Although now residential in character, the routes of former lanes⁰ which linked what was previously rural Roxeth to neighbouring settlements at Northolt, Pinner and Ruislip survive into the present day highway network of South Harrow. No significant changes to the local network of streets and rights of way are envisaged over the next 15 years, however opportunities will be sought through Green Grid projects to enhance awareness of the historical nature of these routes.
- .4 Roxeth Recreation Ground, bounded on two sides by railways⁰ forms a continuation of Harrow Hill's Metropolitan Open Land and will be protected. It includes a grade I Borough site of importance for nature conservation which is contiguous with the Chiltern line railway cutting. Maintenance of Roxeth Recreation Ground will protect and manage the habitat in accordance with Harrow's Biodiversity Action Plan.
- .5 Further public open space in the area is provided by Alexandra Park, Newton Park & Newton Farm Ecology Park. Alexandra Park has the character of a traditional municipal park whilst Newton Park provides playing pitches and access to a semi-natural environment. Future investment in these open spaces will reflect and enhance their character and function; opportunities to provide a multi-use games area will be investigated. To prevent any exacerbation of an existing Borough wide deficiency there will be no net loss of open space, irrespective of ownership or function.
- .6 The Roxbourne River and Yeading Brook tributary flow through Newton Park and surrounding residential areas in open and culverted sections. Open sections through Newton Park and Newton Farm form part of local site of nature conservation importance; these sections will be managed to maintain and enhance biodiversity value and public accessibility, as part of the Borough's Green Grid. Opportunities will be sought to open-up culverted sections where this would achieve sustainable management of flood risk and enhance biodiversity.

Northolt Road, Eastcote Lane, Rayners Lane and Corbin's Lane
the Chiltern line between London Marylebone and Birmingham, which has a modest station
at Northolt Park, and the London Underground Piccadilly line

.7 Within the sub area Rooks Heath School provides valuable community access to indoor sport hall facilities, and this is welcomed.

.8 The Rayners Lane Estate, in the north-east corner of the sub area, is the subject of ongoing renewal and the completion of this regeneration will be supported. Throughout the rest of the area, redevelopment will be managed to safeguard local character and non-designated heritage, and there will be a presumption against development on back gardens.

Box 2

Objectives for South Harrow

1. To improve the public realm of South Harrow district centre by co-ordinating investment
2. To safeguard the South Harrow Arches business use and industrial use areas as a location for economic development
3. To use the Green Grid to promote heritage awareness
4. To resist any loss of Metropolitan Open Land and safeguard its strategic value
5. To protect and manage South Harrow's sites of nature conservation importance
6. To maintain public open spaces in accordance with their character and seek provision of a multi-use games area
7. To retain all forms of open space in the area
8. To maintain and enhance public access and the biodiversity value of the Roxbourne River and Yeading Brook tributary
9. To sustainably manage flood risk
10. To maintain community access to sport and recreation facilities and encourage enhancement
11. To support the ongoing renewal of Rayners Lane Estate
12. To retain the character of the area's suburbs
13. To resist development on back gardens in the area

.9 Additional para here?

Policy CS 3

South Harrow

1. Opportunities to enhance the environmental quality of South Harrow district centre will be sought by the co-ordination of public investment.
2. Proposals for appropriate economic development within the business use and industrial use areas of South Harrow Arches will be supported.
3. Green Grid projects will be used to help convey the rural heritage of parts of the local highway network.
4. The boundaries, strategic function and character of Metropolitan open Land at Roxeth Recreation Ground will be maintained. Proposals for inappropriate uses and development of Metropolitan Open Land will be resisted.
5. The Council will manage Roxeth Recreation Ground and the Newton Parks, and will work with adjoining owners/occupiers as appropriate, to implement the actions of the Biodiversity Action Plan.
6. The Council will manage Alexandra Park and Newton Parks to re-enforce and enhance their character, and seek funding for the provision of a multi-use games area.
7. Proposals involving the loss of open space, or for inappropriate uses or development, will be resisted.
8. The Council will manage the Newton Parks to maintain and enhance public access to, and the biodiversity value of, the Roxbourne River and Yeading Brook tributary.
9. Opportunities will be sought to open-up culverted sections of the Roxbourne River and Yeading Brook where this achieves sustainable flood risk management, habitat creation and, where appropriate, public access.
10. The Council will work with institutions where necessary to support public access to sport and recreation facilities. Appropriate proposals for enhancement of such facilities will be supported.
11. The Council will support the ongoing renewal and regeneration of the Rayners Lane Estate.
12. Proposals which would harm the character of suburban areas and back garden development will be resisted.
13. The redevelopment of identified, previously developed sites to collectively contribute at least 73 homes towards the Borough's housing allocation, set out in the London Plan, will be encouraged.

Justification

.10 Harrow's Retail Study (2009) projects a modest increase of small convenience store floorspace over the period 2009-2026. In recognising the growth of service uses in recent years and the role that these can play in supporting overall town centre vitality and viability, the Study also recommends provision be made for A2, A3, A4 and A5 uses over the same period. As a District Centre, South Harrow has an important role within the town centre hierarchy, providing mainly convenience shops and other services for the locality. The redevelopment of sites within South Harrow District Centre will be required to re-provide viable premises for retail and A2-A5 uses at ground floor. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the status of South Harrow as a District Centre and any potential impact upon other centres within the Borough.

.11 Harrow's Employment Land Study (2010) forecasts an overall contraction in traditional 'B' class employment floorspace but a net increase in office space over the period 2007-2026. Large office buildings constructed in the 1970s and 80s for single occupiers have become unsuited to the needs of the local economy and low office rents have resulted in a very limited supply of new space. Harrow town centre is the focus to provide a new, consolidated office market within the Borough. The mixed-use redevelopment or conversion of redundant office buildings in the Northolt Road business use area therefore offers the opportunity to contribute to housing supply, but should also make provision for appropriate economic uses (excluding main town centre uses) equivalent in value to the number of jobs previously supported on the site. Appropriate community uses may also be supported where the benefit of the use outweighs the loss of the employment generating use. The Study also recognises the quality and useful function of both the Business and Industrial Use Arches, and that they provide a unique offer, and so should be retained. Opportunities to rejuvenate Brember Road Industrial and Business Estate should be pursued to help increase the provision of jobs for local residents, in line with the Sustainable Community Strategy. Harrow's Vitality profiles also identify Roxbourne as one of the Borough's most deprived wards, and so schemes to generate employment and new services and community facilities will be supported

.12 Harrow's suburban areas constitute a large part of the Borough's character and heritage, with many areas displaying strong coherence in design, proportions and pattern of development. The Character Assessment of Harrow's Residential Areas (2010) identifies within the residential suburbs of the South Harrow area estates of traditional inter-war housing, post-war infill development including pockets of 'mock Georgian' housing, and areas of Social Housing, such as the Rayner's Lane Estate. This is undergoing redevelopment, and any further development and redevelopment of social housing will be supported to improve the living conditions of Harrow residents, in line with the Sustainable Community Strategy objectives. When development opportunities arise in suburban areas, substantial weight will be given to the wider setting of the site in determining the appropriate density, scale and form of development. These considerations will also apply to proposals for domestic development. A residential design guide has been published, as a supplementary planning document, which amplifies the appropriate considerations and detailed requirements.

Site	Site Area	Indicative Number of Units	Indicative Phasing
201-209 Northolt Road	0.09	20	2016/17
19, 21 & rear of 11-29 Alexandra Avenue	0.34	10	2012/13

Site	Site Area	Indicative Number of Units	Indicative Phasing
2 Walton Avenue, South Harrow	0.11	14	2010/11
The Matrix PH, South Harrow	0.28	29	2012/13
		Total 73	

Housing Trajectory

.13 Gardens and allotments have a multiplicity of social and environmental benefits, including their positive impact on health and wellbeing, the opportunity for sustainable food production and natural drainage, and as a habitat for biodiversity. Harrow's Biodiversity Action Plan recognises the importance of allotments and gardens in the continued survival of species and habitats, and identifies among other threats the loss of these spaces to development. Amendments to PPS 3 excludes back gardens and allotments from the definition of 'previously developed land' and the London Plan makes provision for LDFs to introduce a presumption against development on back gardens. Harrow's housing trajectory identifies sufficient previously-developed sites to meet the Borough's housing target and policies within this strategy allow for other sites to be brought forward in strategically preferable locations. Development of designated open space (including allotments) and back gardens is therefore strategically unnecessary and will be resisted.

.14 All open space has an intrinsic value and will therefore be protected in quantitative terms. The Metropolitan Open Land at Roxeth Recreation Ground is of strategic importance and links the area with Harrow on the Hill and Sudbury as part of a larger area of Metropolitan open Land, and continues to comply with the relevant criteria for designation, and will therefore be retained. Where opportunities for enhancement of public access to the Metropolitan Open Land and other open space arise, these will be pursued as part of the Borough's Green Grid. Harrow's Green Grid includes a schedule of projects to create an interconnected network of open spaces and river corridors throughout Harrow and across the Borough boundary. Within the South Harrow area these projects aim to link Harrow's space via Roxbourne Park and Roxbourne Rough with the green spaces in Hillingdon. Water course improvements including removing culverts along the Roxbourne, and opening up and improving footpaths between green spaces to the north are also projects that will fulfil the aims of the green grid.

.15 South Harrow falls within the south-west sub area of the 2010 PPG 17 Study. The Study identifies a shortfall in the sub area of 52.48 hectares of open space in 2010, projected to rise to 60.52 hectares in 2026, based upon recommended standards of provision per 1,000 population. The comparable shortfall for the Borough as a whole stands at 117.38 hectares and is projected to rise to 133.76 hectares by 2026. For this reason, and in recognition of the wider sustainability role that open space plays within the urban environment⁰, all open space will be safeguarded and opportunities to increase it will be sought.

notably for biodiversity, natural drainage and flood storage, mitigation of air, light and noise pollution, and for general human health and wellbeing

.16 Within South Harrow sports hall access is provided by Rooks Heath College and outdoor sport pitches are predominantly provided within public open space. These help to provide good levels of accessibility. Investment to provide new facilities should focus on increasing the capacity and accessibility of multi-use game areas; additional facilities of this kind may be most appropriate within Newton Park and Alexandra Park to serve neighbouring residential areas.

.17 Assessment of accessibility deficiency indicates that where new open space is being created as part of development, priority should be given to the provision of small public open spaces, playspace and amenity greenspace. Allotments will continue to meet the needs of local residents in the south-west sub area and the Borough as a whole; any site no longer required for allotment gardening over the plan period will be safeguarded to address the shortfall in accessible natural and semi-natural greenspace. Opportunities for natural and semi-natural greenspace within Alexandra Park will also be sought to address accessibility deficiencies in this part of the Borough.

.18 Detailed requirements for open space provision and contributions, informed by the 2010 Study, will be set out in development management policies, site allocations and a Community Infrastructure Levy as appropriate.

.19 The Sites of Importance for Nature Conservation at Newton Park and Ecology Farm will be retained as important Biodiversity areas for the Borough in line with the aims of the Biodiversity Action Plan, and as areas of flood storage as highlighted in Harrow's Strategic Flood Risk Assessment Stage 1.

.20 The Community Infrastructure Levy Regulations enable local planning authorities to collect from individual developments financial contributions towards infrastructure made necessary by development across the Borough. Infrastructure requirements have been assessed and identified in the Council's Infrastructure Delivery Plan incorporating relevant provisions from the Borough Investment Plan for housing and the Local Implementation Plan for Transport, as well as specific requirements arising from the Biodiversity Action Plan, the management strategies for specific conservation areas, and the documented needs of other community service providers such as the Harrow NHS. The Council will publish a CIL charging schedule following the adoption of this Core Strategy. In accordance with the Regulations, where a specific requirement arises from a particular site or development proposal, this should be provided-for by a Planning Obligation.

Statement of Delivery Mechanisms 2

The Development Management Policies DPD will ensure the continued protection of Metropolitan Open Land and other open space. Where needed to supplement the existing development management provisions of national planning policies and the London Plan, policies will also set out criteria for the assessment of proposals relating to biodiversity and nature conservation, economic development, the management of employment land, town centre uses and town centre vitality and viability, development and sustainable flood risk management, the design and layout of development, and the protection to be afforded to back gardens.

The Site Allocation DPD will identify previously-developed sites for housing.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to deliver the projects and other actions set out in Harrow's Biodiversity Action Plan and Green Grid, and in the on-going management of public open spaces. A replacement Cultural Strategy and Open Spaces Strategy will be prepared and this will include opportunities to work with partner organisations in connection with the delivery of sport, recreation, leisure and open spaces.

The Borough Investment Plan will be maintained to secure the completion of the renewal of the Rayners Lane Estate.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to achieve co-ordinated improvements within the public realm.

Rayners Lane & North Harrow

Draft Core Strategy (Pre-Submission) for O&S

Rayners Lane & North Harrow

Introduction

- .1 The North Harrow and Rayners Lane sub area is centred around the two metroland District Centres that are highly accessible by public transport. The area surrounding these centres is predominantly pre-war suburban and residential in nature and is attractive as areas for families to live and work in.
- .2 Associated with this, the area enjoys good access to open spaces, including a large area of designated green belt to the north, and the historic Headstone Manor and related MetropolitanOpenLand of Headstone Manor Recreation Ground to the east.
- .3 Part of this area around North Harrow center is subject to the risk of flooding as part of the Crane catchment, of which many of its watercourses are culverted.
- .4 North Harrow District centre currently has high levels of vacancy, and is in need of support to maintain it's role as a District Centre and improve the areas retail offer. Rayner's Lane is currently a well performing District Centre, and capitalising on this, and the centre's excellent connectivity are crucial to improve employment and the retail offer in this area. Other parades of shops, notably along Pinner Road towards Harrow Town Centre are also important convenience shopping areas which supplement the District centres.
- .5 Imperial Drive contains a stretch of offices, including some large employers, but the quality of accommodation is becoming dated. Mixed use re-development in this area will therefore be important to maintain the areas employment uses.

Objectives

- d. To provide a mix of housing to meet the needs of the population.
- e. The protection of the areas leafy suburban character and distinctive metroland setting through retaining back gardens and restricting inappropriately designed buildings.
- f. Address the vacancy levels in North Harrow District Centre and consider a range of interventions to rejuvenate the centre.
- g. Support appropriate development in Rayners Lane District Centre to ensure this highly accessible locations potential is maximised.
- h. Support the redevelopment of the areas office market to re-provide employment generating uses as part of mixed use development schemes to provide employment for local residents.
- i. Improve the connectivity between North Harrow town centre and Rayners Lane via Imperial Drive
- j. Support the protection and management of the areas historic heritage, notably Headstone Manor.
- k. Protect and improve open spaces as integral parts of this areas character and history, to provide for both leisure and cultural opportunities, as well as improving biodiversity.
- l. Promote opportunities to connect up the areas open spaces and improve the areas water ways whilst reducing the flood risk in North Harrow.

Policy CS 4

Rayners Lane and North Harrow

A minimum of 259 homes will be delivered on identified, previously developed sites between 2009 and 2026. A net contribution to housing supply will also be sought as part of the mixed use conversion or redevelopment of sites within Rayners Lane and North Harrow centres to help ensure their vitality and viability.

Elsewhere, redevelopment and infill opportunities will be expected to reflect the scale, pattern and appearance of the site's surroundings, which in this area is typically semi detached suburban in character. Development on back gardens will be resisted, reflecting their contribution to the character of residential areas and as an environmental resource.

Retail and mixed use development within Rayners Lane and North Harrow centres, where the scale of development is compatible to the role and function of the centre will be promoted. Rayners Lane will be supported in enhancing its retail and associated town centre offer due to its highly accessible location by public transport to maintain its role as an important retail centre. Retail and wider employment generating uses in North Harrow will be supported where appropriate to improve the centres viability and enhance its role as a convenience shopping destination community and service centre hub. Public transport and public realm improvements will also be sought, especially along Imperial Drive and in both North Harrow and Rayner's Lane centre.

Provision for retail and A2, A3, A4 & A5 uses commensurate in scale and form to to the function of Rayners Lane and North harrow centres will be required at ground floor level. New premises must be viable in terms of size, layout and servicing arrangements, and be accessible to all. The level of parking provision for development will be determined by operational need, standards for disabled people and the standards of the London Plan. Development should be appropriate to the areas predominantly metroland setting.

Redevelopment should make an appropriate contribution to housing supply, commensurate with the areas public transport accessibility level. Development in Rayners Lane centre should have regard to the setting of Rayners Lane station, and the art deco buildings in its vicinity. Development opportunities on the Rayners Lane Pub site that provide employment uses, and protect the Rayners Lane Pub's listed building status will be supported.

Office rejuvenation and conversions as part of a mixed use scheme along Imperial Drive will be supported, alongside other employment generating uses, to secure local jobs in this highly accessible location. The maximum contribution that non-retail commercial uses are to make of a particular centre will be set out in the Development Management Policies DPD.

There will be a presumption against any net loss of open space. The boundaries, strategic function and character of Headstone Manor Metropolitan Open Land will be maintained. Headstone Manor as an important open space and listed building will be protected, and opportunities for enhancement sought. Inappropriate uses and development of open space will be resisted.

The boundaries, strategic function and character of Pinner Park, which is designated Green Belt, will be maintained. Local public rights of way will be safeguarded and, where opportunities arise such as at Yeading Walk, be enhanced as part of the Borough's Green Grid.

Development in North Harrow should have regard to the areas flood risk and be located on sites of lowest risk, in accordance with PPS25. Development in areas of flood risk should provide measures to mitigate and reduce this risk, and where appropriate, achieve this through measures that will improve biodiversity and enhance Harrow's Green Grid.

All development will be required to contribute to the delivery of strategic infrastructure in accordance with the Borough's Community Infrastructure Levy charging schedule. Specifically, improvements to the following junctions will be sought:

- Pinner Road/Station Road (various arms)
- Pinner Road/George V Avenue/headstone Lane (Pinner Road/George v Avenue arms)

Provision for contributions or other requirements specific to the site or proposal will be expected to be made through a s.106 Planning Obligation. New development will be expected to contribute towards improvements in the environment of both centres; to enhancing access to and the quality of local parks and open spaces; and improving the streetscape/public realm along Imperial Drive and Pinner Road.

Justification

.6 Harrow's Retail Study (2009) projects a modest increase of convenience store floorspace over the period 2009-2026. In recognising the growth of service uses in recent years and the role that these can play in supporting overall town centre vitality and viability, the Study recommends provision be made for A2, A3, A4 and A5 uses over the same period. As district centres Rayners Lane and North Harrow have an important role within the town centre hierarchy, providing mainly convenience shops with some limited comparison offer alongside other services.

.7 Rayners Lane has a good range of convenience stores, and is a lower order comparison centre, with additional banks and A3/A5 uses. Development opportunities identified from the Retail Study include the potential for single storey units over the railway; conservative office/hallmark cars; and the Rayners Lane pub [listed] & car park. This supports its continued role as a highly accessible district centre with a predominantly retail nature. Therefore the redevelopment of sites within Rayners Lane District Centres will be required to re-provide viable premises for retail and A2-A5 uses at ground floor.

.8 The Retail Study recognises that North Harrow functions as a medium sized, mainly 'top-up' convenience centre plus A3/A5 uses. There is a strong presence of community facilities: library, Home Guard sports and social club, dental surgery and a newly approved Muslim centre. The Study, in recognising the centres role as wider than retail, therefore justifies the use of alternate employment generating uses that are suitable to a town centre other than retail in this centre. Changes to the retail frontage designation are recommended and will be examined in subsequent DPDs to ensure this centres continued viability.

.9 Any net increase in retail floorspace and A2-A5 floorspace in both centres will be considered in relation to the District status of these centres and any potential impact upon other centres within the Borough.

- .10** Outside of the town centres, the provision of local retail and associated service or community uses help to sustain the neighbourhoods in which they are situated by providing 'walk-to' convenience shopping and services, and particularly for more specialist businesses which might be uneconomic in town centres. For this reason, ground floor commercial premises at Pinner Road outside of designated frontages will be retained for retail and appropriate service and community uses.
- .11** Harrow's Employment Land Study (2010) forecasts an overall contraction in traditional 'B' class employment floorspace but a net increase in office space over the period 2007-2026. Large office buildings constructed in the 1970s and 80s for single occupiers have become unsuited to the needs of the local economy and low office rents have resulted in a very limited supply of new space. Harrow town centre is the focus to provide a new, consolidated office market within the Borough. The mixed-use redevelopment or conversion of redundant office buildings on Imperial Drive therefore offers the opportunity to contribute to housing supply, but should also make provision for appropriate economic uses (excluding main town centre uses) equivalent in value to the number of jobs previously supported on the site. Appropriate community uses may also be supported where the benefit of the use outweighs the loss of the employment generating use.
- .12** During 2009 the Greater London Authority (GLA) conducted a London-wide Strategic Housing Land Availability Assessment which has informed the Mayor's review and replacement of the existing London Plan. The requirement for an additional 5,345 homes in Harrow flows from the London-wide Assessment and takes into account the Borough's housing delivery performance in recent years.
- .13** The Strategic Housing Land Availability Assessment and Harrow's housing trajectory demonstrates there are a number of existing sites located throughout the Rayners Lane and North Harrow suburban area, which offer the potential for redevelopment to meet the need for a range of housing types including the delivery of affordable housing. The Core Strategy therefore promotes redevelopment of these strategic brownfield sites. This includes a number of sites within the district centres, where mixed use development will be encouraged in recognition of the need to maintain the important role and function of these centres in providing a sense of community and in the provision of local shops and services.
- .14** The density, type and scale of development to be achieved on an individual site will depend on the accessibility of the site to public transport and the local context, including the local built form and character and prevailing densities that contribute to an area's sense of place, notably 1930's metroland in this area. A Residential Design Guide SPD has been produced to amplify the considerations for residential development. The Core Strategy therefore seeks to place greater emphasis on development that enhances and protects the qualities in this area - notably the metroland suburban setting.
- .15** Harrow's Biodiversity Action Plan recognises the importance of allotments and gardens. Amendments to PPS 3 excludes back gardens and allotments from the definition of 'previously developed land' and the London Plan makes provision for LDFs to introduce a presumption against development on back gardens. Harrow's housing trajectory identifies sufficient previously-developed sites to meet the Borough's housing target and policies within this strategy allow for other sites to be brought forward in strategically preferable locations. Development of designated open space (including allotments) and back gardens is therefore strategically unnecessary and will be resisted.

.16 The Metropolitan open Land at Headstone Manor contains an important historical building, and is now a museum. Protecting this listed buildings setting, and ensuring the Metropolitan Open Land continues to provide open space for residents and tourists to enjoy is therefore of strategic importance, and the designation will be retained. As part of the Green Grid, opportunities to open up and improve this open space will be pursued to enable the area to fulfill its potential for recreation and biodiversity. Similarly, the Green Belt at Pinner Farm, although mostly private, is an important area for biodiversity, and acts as a natural drainage space as part of the Crane catchment, and so its designation and boundaries will be protected. Where opportunities for enhancement of public access to open spaces arise, these will be pursued as part of the Borough's Green Grid.

.17 North Harrow and Rayners Lane spans across parts of three of the 2010 PPG 17 Study sub areas⁰. The Study identifies shortfalls, based upon recommended standards per 1,000 population, of 52.48 hectares in the south-west sub area and 67.13 hectares in the central sub area in 2010. These shortfalls are projected to rise to 60.52 hectares and 67.20 hectares respectively in 2026. The comparable shortfall for the Borough as a whole stands at 117.38 hectares and is projected to rise to 133.76 hectares by 2026. For this reason, and in recognition of the wider sustainability role that open space plays within the urban environment⁰, all open space will be safeguarded and opportunities to increase it will be sought.

.18 The Zoom Leisure sports hall facility is located at the interface of the North Harrow and Rayners Lane sub area with the Harrow and Wealdstone Intensification Area. Some outdoor sport pitches within the sub area are located within public open space and valuable additional provision is made by community access to a number of privately owned sites. Investment to increase pitch provision and multi-use games areas should focus on sites which would address gaps in recommended standards of accessibility, particularly to the west of North Harrow.

.19 Available investment in parks should be directed towards qualitative improvements at Headstone Manor Recreation Ground and Woodlands Open Space, which are assessed as being of high value but poor quality, and opportunities will be sought to promote the function of large public open spaces to that of a district park. Green Grid projects which enhance accessibility to district parks will be prioritised.

.20 New development will be expected to be provided for children's play and amenity greenspace. Across all types of play space there is a gap in accessibility between North Harrow and Rayners Lane, and investment should be prioritised towards this area. Rayners Mead should be considered as a suitable site for appropriate new facilities, and enhancement of facilities at Headstone Manor Recreation Ground should focus on fulfilling the site's potential to provide youth space.

.21 Pinner Road cemetery is identified as a high value but low quality site. Sensitive investment which enhances its value by use as an accessible natural and semi-natural greenspace should be considered. Allotments will continue to meet the needs of local residents in North Harrow and Pinner, and of the Borough as a whole; any site no longer required for allotment gardening over the plan period will be safeguarded to address the shortfall in accessible natural and semi-natural greenspace.

Rayners Lane and West Harrow wards in the south-west sub area; Headstone South ward in the central sub area; and Headstone North in the north-west sub area notably for biodiversity, natural drainage and flood storage, mitigation of air, light and noise pollution, and for general human health and wellbeing

.22 Detailed requirements for open space provision and contributions, informed by the 2010 Study, will be set out in development management policies, site allocations and a Community Infrastructure Levy as appropriate.

.23 The 2009 Transport Audit prepared by Mouchel, assesses the potential impacts of future development on the capacity of the existing transport network. The lack of capacity on the road network, especially on the key junctions in this area is identified as an existing issue. Supporting development in areas of high public transport accessibility is also detailed as this is the most sustainable pattern of development, especially as the Transport Audit assessed the local capacity of the underground rail network in Harrow. The study based 'capacity' on standards set by TfL for crush load, seating and realistic standing capacity. The Transport Audit identified that, both Rayners Lane and North Harrow underground rail stations have spare capacity both ways at peak periods. Accessibility to both these stations however needs to be improved, to be supported by TfL and funds through a future CiL.

.24 The Community Infrastructure Levy Regulations enable local planning authorities to collect from individual developments financial contributions towards infrastructure made necessary by development across the Borough. Infrastructure requirements have been assessed and identified in the Council's Infrastructure Delivery Plan incorporating relevant provisions from the Borough Investment Plan for housing and the Local Implementation Plan for Transport, as well as specific requirements arising from the Biodiversity Action Plan, the management strategies for specific conservation areas, and the documented needs of other community service providers such as the Harrow NHS. The Council will publish a CiL charging schedule following the adoption of this Core Strategy. In accordance with the Regulations, where a specific requirement arises from a particular site or development proposal, this should be provided-for by a Planning Obligation.

Statement 2

Delivery

The Development Management Policies DPD will ensure the continued protection of Metropolitan Open Land, Green Belt and other open space. Policies will also set out criteria for the assessment of proposals relating to biodiversity and nature conservation, listed buildings, historic parks and gardens, economic development, the management of employment land, town centre uses and town centre vitality and viability, the design and layout of development, and the protection to be afforded to back gardens. These policies will also consider the designation of town centres and shopping frontages, alongside criteria for mixed use development in designated centres.

Development Management Policies will be amplified where appropriate by supplementary planning documents. These will include the Harrow Residential Design Guide and Sustainable Building Design SPD.

The Site Allocation DPD will identify previously-developed sites for housing and may also highlight the potential for renewal through mixed use development of offices.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to deliver the projects and other actions set out in Harrow's Biodiversity Action Plan and Green Grid. A replacement Cultural Strategy and Open Spaces Strategy will be prepared and this will include opportunities to work with partner organisations in connection with the delivery of sport, recreation, leisure and open spaces.

The Council will review the Borough Investment Plan and continue to work with the Homes and Communities Agency [now GLA?] to support affordable housing schemes and estate renewal in Rayner's Lane.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to achieve co-ordinated improvements within the public realm.

Housing Trajectory Sites

Site	Site Area	Indicative Number of Units	Indicative Phasing
19 Pinner Road (Travis Perkins)	0.65	147	2011/12, 2012/13
The Vaughan Centre, Wilson Gardens	0.14	13	2013/14
90-100 Pinner Road	0.06	12	2012/13
29-33 Pinner Road	0.1	34	2010/11
186-194 Pinner Road	0.11	14	2010/11

Site	Site Area	Indicative Number of Units	Indicative Phasing
Rayners Lane PH	0.32	20	2014/15
Allied Carpets, Pinner Road, North Harrow	0.29	19	2024/25
		Total 259 (112)	

Housing Trajectory

Evidence Studies

.25 Rayners Lane district centre (and part conservation area)

.26 North Harrow district centre (part flood risk)

Retail Study

.27 Rayners Lane:

- good range of convenience stores, lower order comparison, banks and A3/A5 uses; below national average vacancy [at time of writing report?]
- strong presence of community facilities: library, Zoroastrian centre
- good national and independent/ethnic retailer representation
- total of 244 car parking spaces (London underground car park)
- moderately high traffic flows Imperial drive/Alexandra Avenue a barrier to movement
- reasonable environmental quality with wide pavements/trees etc (but poor quality to Imperial Dive)
- no change to retail frontage recommended
- development opportunities identified: single storey units over railway; conservative office/hallmark cars; Rayners Lane pub [listed] & car park - 3,500 sq. m

.28 North Harrow:

- medium sized centre functions mainly as a 'top-up' convenience centre plus A3/A5 uses, with below national average vacancy [at time of report?]
- strong presence of community facilities: library, Home Guard sports and social club, dental surgery [+ newly approved Muslim centre]
- very limited national retailer representation
- total of 151 off-street parking spaces (Cambridge Road car park)
- good crossing opportunities and wide pavements
- no major environmental issues identified
- changes to retail frontage designation recommended
- development opportunities identified: Cambridge Road car park [but flood risk] and North Harrow Methodist Church [but in active use] - 2,000 sq. m

Employment Land Study

.29 Various Offices, Imperial Drive - 1.0 hectares - scores 19. Mix of office buildings and some education use (regent college) Located in Rayner's Lane town centre with good access. Part of the northern site is identified for redevelopment. Space to rent in reasonable condition. Ladbrokes operates from here.

Transport Study

.30 Highway junctions with potential future capacity problems:

- Pinner Road/Station Road (various arms)
- Pinner Road/George V Avenue/headstone Lane (Pinner Road/George v Avenue arms)

.31 Buses

- no capacity issues at 8.35% passenger growth (sensitivity testing revealed no impacts on bus services through North Harrow or Rayners Lane centres)

.32 Underground (taking into account planned capacity improvements)

- Metropolitan line: no capacity issues (both branches)
- Piccadilly line: no capacity issues

West London SHMA/Viability Study/Housing Capacity

PPG 17 Study

.33 Pinner Park Farm, Headstone Manor. Green Grid.

Strategic Flood Risk Assessment

.34 Part of the Crane catchment - Yeading Brook, Smarts Brook, Yeading Brook West and Greenhill Stream. Area of flood risk zone 2/3 North Harrow.

Character Study

Contextual Stuff

London Plan designations

Relationship with Harrow Sustainable Community Plan

.35 Relevant short-term actions (delete as appropriate to sub area policy)

- increase provision of affordable housing
- Increase sustainability/air quality by reducing car use as mode of travel to school
- Improve street and environmental cleanliness
- Increase domestic waste recycling and composting
- Undertake tree replacement programme (relate to green grid actions?)
- Deliver decent homes standard to Council owned homes
- Implement biodiversity action plan (relevant actions?)

- Regenerate rayners lane and mill farm
- Improve the safety of journeys between home and school
- Reduce the number of empty homes and households in temporary accommodation
- Develop more extra care housing
- Increase migrants' english language schools and knowledge (d1 uses in offices?)

.36 Relevant ambitions (delete as appropriate to sub area policy)

- Employment land is maintained and enhanced to provide local residents with the opportunity to work within the Borough
- Business occupancy is maintained and new businesses are attracted to Harrow
- Major new businesses are committed to training and skills through planning conditions
- Tourism to continue to support the local economy and create local employment
- Schools rebuilt/remodelled (ambition relates to now defunct BSF)
- New developments are aligned with transport routes
- Transport routes are aligned with high density development
- Residents have a choice of good quality and affordable housing in a variety of tenures, in particular improve the availability of larger family housing
- Increase the use of sustainable energy
- Work closely with TfL to improve the access and reliability of public transport
- There is easy and convenient access to footpaths, cycle paths and public transport to promote the use of more sustainable modes of transport for local journeys
- New developments are of a high quality design and are appropriate in terms of their scale, size and location
- High density development includes provision for mixed use activities on site
- Harrow's existing heritage buildings and sites are preserved and enhanced
- There is a balance and variety of well managed and accessible green spaces, and the Green Belt and biodiversity is protected and improved
- The growth of waste is reduced through improved awareness of waste issues and the importance of waste reduction
- Waste will be diverted from landfill by focusing on increasing the amount of waste we recycle and compost
- There is continued investment to improve social housing and public infrastructure (roads, public spaces and street lighting)
- There will be a range of learning, leisure and cultural opportunities
- There will continue to be a range of arts and sports facilities that are accessible to everyone
- The accommodation needs of Gypsies and Travellers will be met to enable them to raise their families in a safe and healthy environment
- Harrow will continue to be one of the safest boroughs in London
- Services are more personalised and neighbourhood focused

Harrow Vitality Profiles

- .37** Two of the least deprived wards in the borough - IMD 2007.
- .38** Some of the lowest numbers of social housing in the Borough.
- .39** Area of low housing need 2009.

Pinner & Hatch End

Draft Core Strategy (Pre-Submission) for O&S

Pinner & Hatch End

Introduction

.1 The Pinner and Hatch End Suburb is located towards the north west of the Borough, with Pinner District Centre and Hatch End Local Centre the focal points and areas most accessible via public transport. Pinner centre is served by the Metropolitan Line, and is fully accessible. Hatch End is served by the London Overground service running from London Euston to Watford. This good accessibility makes these areas popular for commuters, coupled with the predominantly large suburban dwellings that populate the area. This suburban landscape, with leafy, well appointed streetscapes and layout, and low density housing within easy reach of the Green Belt make it in general a prosperous and desirable suburban area of Harrow.

Policy CS 5

Pinner and Hatch End

The Pinner Hill Area of Special Character will be maintained for its intrinsic value. Public access to and views from the Pinner Hill viewpoint will be safeguarded. Identified views towards the Harrow Weald Ridge Area of Special Character will also be protected.

There will be a presumption against any net loss of open space. The boundaries, strategic function and character of the Green Belt and Metropolitan Open Land will be maintained. Inappropriate uses and development of the Green Belt and other open space will be resisted. Sites of Importance for Nature Conservation will be protected as appropriate to their classification and will be kept under review. The London Loop strategic walking route and local public rights of way will be safeguarded and, where opportunities arise, be enhanced. Priority will be given to Green Grid projects which restore and improve public access to the River Pinn & Yeading Brook, and to those which enhance the area's heritage.

All development will be required to make provision for playspace, with the presumption in favour of on-site provision. Where there are opportunities for additional open space on sites, priority will be given to pocket parks and amenity greenspaces in locations with poor existing accessibility. Continued community access to existing public and private facilities will be supported, and opportunities for increased access will be sought. The capacity of existing swimming provision at Hatch End Pool will be safeguarded. Investment to address other deficiencies in open space provision will focus on multi-use games areas and projects which enhance the accessibility, quality and value of existing sites; contributions towards such investment will be sought through a Community Infrastructure Levy.

Pinner and Hatch End's heritage assets, comprising its conservation areas, listed buildings and scheduled ancient monuments will be preserved and enhanced. Sites of identified archaeological and geological importance will be protected.

The Council will apply the sequential and, where appropriate, exception tests to the allocation of development sites and to development proposals. Development will be managed with the aim of achieving an overall reduction in flood risk and to increase resilience to flood events. The capacity of the functional floodplain within greenfield sites will be maintained and opportunities to enhance or re-instate the functional flood plain on previously-developed sites will be sought. River restoration and deculverting projects should achieve integrated flood management, biodiversity and where appropriate public access benefits.

A minimum of [107] homes will be delivered on identified, previously developed sites between 2009 and 2026, including a net increase in homes as part of the regeneration of Mill Farm Estate. A net contribution to housing supply will also be sought as part of the mixed use conversion or redevelopment of sites [need some sort of site size threshold here?] within Pinner district centre and Hatch End local centre. Proposals for ten or more dwellings will be required to provide [50% or the maximum viable?] of the [dwellings or floorspace?] as affordable homes, taking into account the size and form of the homes required and the priority to be given to the delivery of other infrastructure requirements.

Pinner will continue to function as a district centre offering a range of convenience and comparison retailing and associated town centre services. Within the centre, redevelopment appropriate to the centre's function and village character will be supported. Provision for town centre uses commensurate with Pinner's district catchment and function will be encouraged, but will be confined to appropriate A1, A2, A3, A4 & A5 uses at ground floor level within the primary shopping core. New premises must be viable in terms of size, layout and servicing [cross refer service road proposals in the RJ] arrangements, and be accessible to all. Special attention should be paid to the impact of redevelopment within the centre upon the village's historic fabric, flood risk and below-ground archaeology. Redevelopment should make an appropriate contribution to housing supply, subject to flooding considerations and commensurate with the centre's moderate [define in RJ] public transport accessibility level.

Hatch End will continue to function as a local centre offering 'top-up' convenience and specialist comparison retailing and associated A1, A2, A3, A4 & A5 uses. Within the centre, redevelopment commensurate to the centre's function and Metroland character will be supported, subject to the provision of appropriate uses and active frontage at ground floor level. New premises must be viable in terms of size, layout and servicing [cross refer service road proposals in the RJ] arrangements, and be accessible to all. Special attention should be paid to the impact of redevelopment within the centre upon flood risk. Redevelopment should make an appropriate contribution to housing supply, subject to flooding considerations and commensurate with the centre's modest [define in RJ] public transport accessibility level.

Within the existing active frontages of non-town centre retail parades at Pinner Green, Cannon Lane/Whittington Way and Long Elmes, retail and other appropriate commercial or community uses will be retained at ground floor level.

The Chantry Place industrial and business use area will be retained for appropriate B1, B2 and B8 uses. The redevelopment or conversion of offices within Pinner district centre will be expected to make provision for uses equivalent in economic or community value to the existing floorspace on the site [need to think about how this will be assessed and say something about it]. New premises must be viable in terms of size, layout and servicing arrangements, and be accessible to all.

Elsewhere, redevelopment and infill opportunities will be expected to reflect scale, pattern and appearance of the site's surroundings. Development on back gardens will be resisted, reflecting their contribution to the character of residential areas and as an environmental resource.

Priority will be given to transport investment which addresses the capacity of the Uxbridge Road/Elm Park Road junction at Pinner Green. The provision of car parking will be managed to ensure that new development supports a modal shift from private car use to more sustainable modes.

All development will be required to contribute to the delivery of strategic infrastructure in accordance with the Borough's Community Infrastructure Levy charging schedule. [say something here about specific infrastructure needed in the sub area based on borough/infrastructure delivery plans and LIP]. Provision for contributions or other requirements specific to the site or proposal will be expected to be made through a s.106 Planning Obligation.

Reasoned Justification

.2 Harrow Weald Ridge was identified as an Area of Special Character in the 1986 Harrow Borough Local Plan in recognition of the backdrop that its high ground, with extensive tree cover and major open areas, provides when viewed from the generally lower suburban areas. The boundaries of the Area of Special Character were drawn to include Pinner Hill, as a separate area, because "...the Council also considers it is appropriate to include the Pinner Hill Estate in the western sector of the Green Belt, which is situated on rising ground and whose extensive tree cover forms a natural extension to Oxhey Woods in Hertfordshire. The adjacent area of Pinner Hill Golf Course is also considered worthy of inclusion by virtue of its open character, its height and tree cover; the Pinnerwood Park Farm Conservation Area is included for architectural and historic reasons". The designation was carried forward and incorporated into the Harrow Unitary Development Plan (1994) and again into the replacement Harrow Unitary Development Plan (2004). The important characteristics of the Pinner Hill part of the Harrow Weald Ridge Area of Special Character remain valid and equally important today. The Pinner Hill Area incorporates a two conservation areas, ?? listed buildings, a scheduled ancient monument, and ?? hectares of Green Belt including a grade 1 site of Borough nature conservation importance. For these reasons the continuation of this strategic designation is merited.

.3 Irrespective of ownership, use, public accessibility and condition, all open space has an intrinsic value and will therefore be protected in quantitative terms. The open countryside to the north of the Borough forms a part of Greater London's Green Belt and continues to contribute to the purposes of including land in the Green Belt as set out in PPG 2, and will therefore be retained. As much of this is in private ownership and use, the opportunity provided by the London Loop strategic walking route and other public rights of way are crucial for general public access and will therefore be protected and enhanced as part of the Borough's Green Grid.

.4 Harrow's Green Grid includes a schedule of projects to create an interconnected network of open spaces and river corridors throughout Harrow and across the Borough boundary. Within the Pinner and Hatch End area, priority projects are themed around the London Loop strategic walking route⁰, the Yeading Brook and River Pinn and its tributaries⁰, and heritage infrastructure⁰.

.5 Pinner and Hatch End fall within the north-west sub area of the 2010 PPG 17 Study. The area is well served by open space, with the total level of accessible space above that generated by the recommended standards of provision. However this does not mean that there is a 'surplus' of space. The Study identifies a shortfall in the Borough as a whole of 117.38 hectares open space in 2010, projected to rise to 133.76 hectares in 2026, based upon recommended standards of provision per 1,000 population. For this reason, and in recognition of the wider sustainability role that open space plays within the urban environment⁰, all open space will be safeguarded and opportunities to increase it will be sought. Much of the sub area's open space also has a strategic function as Green Belt and Metropolitan Open Land.

including signage and footpath improvements
 including improvements to publicly accessible stretches and addition of new footpath links, deculverting sections and associated enhancement of biodiversity
 environmental improvements to Grims Ditch, legibility improvements between West House, Pinner Village and Headstone Manor, and maintenance to/upgrade of Harrow Arts Centre notably for biodiversity, natural drainage and flood storage, mitigation of air, light and noise pollution, and for general human health and wellbeing

- .6** Notwithstanding satisfactory quantitative levels of provision across a number of open space typologies in the sub area, there remain some significant gaps in accessibility to open space within Pinner and Hatch End. Some of these gaps coincide with the Green Belt areas, which are populated at comparatively low densities, but others relate to the residential areas around Hatch End and to the south of Pinner. Opportunities will be sought in this area to, though on-site provision or other means, to address these accessibility deficiencies. All new development will be expected to make on-site provision for children's play.
- .7** The area continues to be well served by indoor sport facilities including the Hatch End swimming pool and community access to facilities at Heathfield, Hatch End and Nower Hill schools. Community access to sports clubs and public facilities provide a similarly rich availability of opportunities to participate in outdoor sport in the Pinner and Hatch End area. Opportunities for increased provision of multi-use games areas and youth playspace will be prioritised and should focus on areas of identified access deficiency.
- .8** The Western Rivers group of Green Grid projects will enhance the quality and accessibility of green corridors, and will provide the main opportunity for increasing local access to natural and semi-natural environments. Investment will also be sought to enhance existing natural and semi-natural greenspace in the area. Sensitive investment to improve the quality and value of Paines Lane Cemetery, by use as an accessible natural and semi-natural greenspace, should be considered. Allotments will continue to meet the needs of local residents in Pinner and Hatch End, and of the Borough as a whole; any site no longer required for allotment gardening over the plan period will be safeguarded to to address the shortfall in accessible natural and semi-natural greenspace.
- .9** Detailed requirements for open space provision and contributions, informed by the 2010 Study, will be set out in development management policies, site allocations and a Community Infrastructure Levy as appropriate.
- .10** Pinner and Hatch End are rich in heritage. Statutory designations reflect the area's medieval origins and its role in the rural landscape of Middlesex, as well as the best of the area's early suburban growth. The Pinner Conservation Areas SPD was adopted in 2009 and incorporates appraisals and management strategies for the conservation areas within the Pinner and Hatch End neighbourhood⁰. The Council has also issued advisory notes in connection with the Grims Ditch and Pinner Park Farm scheduled ancient monuments. All heritage assets in the area will continue to be protected.
- .11** The Borough's Strategic Flood Risk Assessment (2009) identifies parts of Pinner and Hatch End as being at risk of flooding from the River Pinn and its tributaries. Development will be managed in accordance with the sequential and (where appropriate) exception tests set out in Planning Policy Statement 25: *Development and Flood Risk* (2006) to help manage risk from and increase resilience to flooding. An overall reduction in flood risk will be achieved through the use of sustainable urban drainage systems to achieve greenfield run-off rates in accordance with policy recommendations set out in the Assessment, to be brought forward through the Development Management Policies DPD. The Level 2 Strategic Flood Risk Assessment (2011) will be used in the preparation of the Site Allocations DPD to direct development appropriately in relation to the flood risk vulnerability of uses and the land's probability of flooding.

.12 Harrow's Housing Trajectory demonstrates capacity to provide [107] net additional homes on identified, previously developed sites within the Pinner and Hatch End neighbourhood area, over the period 2009-2026. This includes a net increase of 55 homes as part of the planned Mill Farm Close regeneration scheme. Additional housing capacity will be sought from unforeseen opportunities on previously developed sites within Pinner district centre and Hatch End local centre. The West London Strategic Housing Market Assessment demonstrates a requirement for [??] affordable homes across the sub-region and for [??] within the London Borough of Harrow. [something here about the conclusions of the viability assessment]. To ensure that all sites above the London Plan threshold of ten or more dwellings contributes to the delivery of the Borough's minimum requirement, or helps to exceed it, the maximum viable number of dwellings up to 50% of all the dwellings proposed on the site will be sought as affordable homes. [something here about the tenure and size mix][anything to add here that shows the level of need within the sub area/any specific requirements??]

Site	Site Area	Indicative Number of Units	Indicative Phasing
Land rear of 71 Bridge Street	0.12	30	2012/13
Mill Farm Close redevelopment	2.1	55	2014/15
Land at Harrow Arts Centre	0.34	22	2018/19
		Total 107	

Housing Trajectory

.13 Harrow's Retail Study (2009) projects a modest increase of small convenience store floorspace over the period 2009-2026. In recognising the growth of service uses in recent years and the role that these can play in supporting overall town centre vitality and viability, the Study also recommends provision be made for A2, A3, A4 and A5 uses over the same period. Pinner is identified in the Study as a thriving district centre, well represented by both national & independent retailers and benefiting from a good quality environmental setting. The redevelopment of sites within Pinner will be required to re-provide viable premises for retail and A2-A5 uses at ground floor and will need to pay special attention to the area's historic character. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the role and function of the centre and any potential impact upon other centres within the Borough.

.14 The Retail Study (2009) recommends amendments to retail frontage designations within Pinner district centre and identifies potential development opportunities to provide up to 1,500 sq. metres retail floorspace. These detailed matters will be pursued through Development Management Policies and Site Allocations, to be brought forward as separate DPDs.

.15 As a local centre Hatch End has a modest role within the town centre hierarchy, providing mainly convenience shops and other services for the immediate locality. The redevelopment of sites within Hatch End local centre will be required to re-provide viable premises for retail and A2-A5 uses at ground floor. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the status of Hatch End as a local centre and any potential impact upon other centres within the Borough.

.16 Outside of town centres, the provision of local retail and associated service or community uses help to sustain the neighbourhoods in which they are situated by providing 'walk-to' convenience shopping and services, and particularly for more specialist businesses which might be uneconomic in town centres. For this reason, ground floor commercial premises at Pinner Green [add addresses as footnote] and Whittington Way/Cannon Lane [add addresses as footnote] will be retained for retail and appropriate service and community uses.

.17 Harrow's Employment Land Study (2010) forecasts an overall contraction in traditional 'B' class employment floorspace but a net increase in office space over the period 2007-2026. The release of non-office 'B' class space will need to be carefully monitored and managed to ensure that good quality provision, which will continue to make a contribution to the local economy, is protected. As a good quality business and industrial use area, Chantry Place will be safeguarded for appropriate B1, B2 and B8 uses.

.18 Large office buildings constructed in the 1970s and 80s for single occupiers have become unsuited to the needs of the local economy and low office rents have resulted in a very limited supply of new space. Harrow town centre is the focus to provide a new, consolidated office market within the Borough. The mixed-use redevelopment or conversion of redundant office buildings in Pinner district centre therefore offers the opportunity to contribute to housing supply, but should also make provision for appropriate economic uses (excluding main town centre uses) equivalent in value to the number of jobs previously supported on the site. Appropriate community uses may also be supported where the benefit of the use outweighs any loss in employment value.

.19 Harrow's suburban areas are a cherished part of the Borough's character and heritage, with many areas displaying strong coherence in design, proportions and pattern of development. The Character Assessment of Harrow's Residential Areas (2010) identifies within the residential suburbs of Pinner and Hatch End a number of typologies including Edwardian villas, former rural lanes, art deco flats, smaller inter-war housing estates and post-war suburban estates. When development opportunities arise in suburban areas, substantial weight will be given to the wider setting of the site in determining the appropriate density, scale and form of development. These considerations will also apply to proposals for domestic development. A residential design guide has been published, as a supplementary planning document, which amplifies the appropriate considerations and detailed requirements.

.20 As with other forms of open space, gardens and allotments have a multiplicity of social and environmental benefits, including their positive impact on health and wellbeing, the opportunity for sustainable food production and natural drainage, and as a habitat for biodiversity. Harrow's Biodiversity Action Plan recognises the importance of allotments and gardens in the continued survival of species and habitats, and identifies among other threats the loss of these spaces to development. Amendments to PPS 3 excludes back gardens and allotments from the definition of 'previously developed land' and the London Plan makes provision for LDFs to introduce a presumption against development on back gardens. Harrow's housing trajectory identifies sufficient previously-developed sites to meet the Borough's housing target and policies within this strategy allow for other sites to be brought forward in strategically preferable locations. Development of designated open space (including allotments) and back gardens is therefore strategically unnecessary and will be resisted.

.21 Harrow's Transport Study (2010) identifies potential future capacity problems at the Uxbridge Road/Elm Park Road/Pinner Green junction. Opportunities will be sought through the Borough Investment Plan and development to secure the proper functioning of the junction in the long term.

.22 Household car ownership across the Pinner and Hatch End sub area is generally high. The high level of car ownership across the Borough means that encouraging car owners to change their mode of transport to a more sustainable form such as public transport or, particularly for shorter trips cycling and walking, is a significant challenge. The London Plan sets out maximum parking standards and these will be applied, alongside the spatial co-ordination of development with public transport accessibility and services set out in this strategy, to encourage a more sustainable lifestyle.

.23 The Community Infrastructure Levy Regulations enable local planning authorities to collect from individual developments financial contributions towards infrastructure made necessary by development across the Borough. Infrastructure requirements have been assessed and identified in the Council's Infrastructure Delivery Plan incorporating relevant provisions from the Borough Investment Plan for housing and the Local Implementation Plan for Transport, as well as specific requirements arising from the Biodiversity Action Plan, the management strategies for specific conservation areas, and the documented needs of other community service providers such as the Harrow NHS. The Council will publish a CIL charging schedule following the adoption of this Core Strategy. In accordance with the Regulations, where a specific requirement arises from a particular site or development proposal, this should be provided-for by a Planning Obligation.

Relationship with Harrow Sustainable Community Plan

.24 Relevant short-term actions (delete as appropriate to sub area policy)

- increase provision of affordable housing
- Increase sustainability/air quality by reducing car use as mode of travel to school
- Improve street and environmental cleanliness
- Increase domestic waste recycling and composting
- Undertake tree replacement programme (relate to green grid actions?)
- Deliver decent homes standard to Council owned homes
- Implement biodiversity action plan (relevant actions?)
- Regenerate rayners lane and mill farm
- Improve the safety of journeys between home and school
- Reduce the number of empty homes and households in temporary accommodation
- Develop more extra care housing
- Increase migrants' english language schools and knowledge (d1 uses in offices?)

.25 Relevant ambitions (delete as appropriate to sub area policy)

- Employment land is maintained and enhanced to provide local residents with the opportunity to work within the Borough
- Business occupancy is maintained and new businesses are attracted to Harrow
- Major new businesses are committed to training and skills through planning conditions
- Tourism to continue to support the local economy and create local employment
- Schools rebuilt/remodelled (ambition relates to now defunct BSF)
- New developments are aligned with transport routes
- Transport routes are aligned with high density development
- Residents have a choice of good quality and affordable housing in a variety of tenures, in particular improve the availability of larger family housing
- Increase the use of sustainable energy

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- Work closely with TfL to improve the access and reliability of public transport
- There is easy and convenient access to footpaths, cycle paths and public transport to promote the use of more sustainable modes of transport for local journeys
- New developments are of a high quality design and are appropriate in terms of their scale, size and location
- High density development includes provision for mixed use activities on site
- Harrow's existing heritage buildings and sites are preserved and enhanced
- There is a balance and variety of well managed and accessible green spaces, and the Green Belt and biodiversity is protected and improved
- The growth of waste is reduced through improved awareness of waste issues and the importance of waste reduction
- Waste will be diverted from landfill by focusing on increasing the amount of waste we recycle and compost
- There is continued investment to improve social housing and public infrastructure (roads, public spaces and street lighting)
- There will be a range of learning, leisure and cultural opportunities
- There will continue to be a range of arts and sports facilities that are accessible to everyone
- The accommodation needs of Gypsies and Travellers will be met to enable them to raise their families in a safe and healthy environment
- Harrow will continue to be one of the safest boroughs in London
- Services are more personalised and neighbourhood focused

Harrow Vitality Profiles

- .26** Pinner South ward with lowest proportion of households with an income below 15k.
- .27** Low rate of households on housing benefit.
- .28** Lowest rate of persons claiming pensions credit but large number of pensioners.
- .29** One of the lowest number of people unemployed of working age.
- .30** High car ownership levels - over 85% of households.
- .31** Area of low housing need.

Stanmore & Harrow Weald

Draft Core Strategy (Pre-Submission) for O&S

Stanmore & Harrow Weald

.1 Introductory paragraphs here

Policy CS 6

Harrow Weald and Stanmore

The Harrow Weald Ridge Area of Special Character will be maintained for its intrinsic value. Public access to and views from the Old Redding viewpoint will be safeguarded. Identified views towards the Harrow Weald Ridge Area of Special Character will also be protected.

The Royal National Orthopaedic Hospital is a nationally recognised health care facility and a major employing organisation; Bentley Priory is a site of national historical and cultural significance. The future of these important assets within the Harrow Weald Ridge Area of Special Character and the Green Belt will be secured. [not sure about this wording - will perhaps be similar to harrow Hill etc i.e. support for strategic development and in GB terms the potential to demonstrate very special circumstances etc] RNOH Major Development Site within the Green Belt.

There will be a presumption against any net loss of open space. The boundaries, strategic function and character of the Green Belt and Metropolitan Open Land will be maintained. [mention in RJ also the presence of SSSIs - no policy protection needed as they are covered by legislation] Inappropriate uses and development of the Green Belt and other open space will be resisted. Sites of Importance for Nature Conservation will be protected as appropriate to their classification and will be kept under review. The London Loop strategic walking route and local public rights of way will be safeguarded and, where opportunities arise, be enhanced. Green Grid projects which improve links to and within the Green Belt, and which restore and improve access to the Edgware Brook will be prioritised.

All development will be required to make provision for playspace, with the presumption in favour of on-site provision. Where there are opportunities for additional open space on sites, priority will be given to pocket parks in locations with poor existing accessibility, and an extension to Harrow Weald Cemetery. Continued community access to existing public and private facilities will be supported, and opportunities for increased access will be sought. Investment to address other deficiencies in open space provision will focus on multi-use games areas and projects which enhance the accessibility, quality and value of existing sites; contributions towards such investment will be sought through a Community Infrastructure Levy.

Harrow Weald and Stanmore's heritage assets, comprising its conservation areas, listed buildings, historic parks & gardens and scheduled ancient monuments will be preserved and enhanced. Sites of identified archaeological importance will be protected.

The Council will apply the sequential and, where appropriate, exception tests to the allocation of development sites and to development proposals. Development will be managed with the aim of achieving an overall reduction in flood risk and to increase resilience to flood events. The capacity of the functional floodplain within greenfield sites will be maintained and opportunities to enhance or re-instate the functional flood plain on previously-developed sites will be sought. River restoration and deculverting projects should achieve integrated flood management, biodiversity and where appropriate public access benefits.

A minimum of [684] homes will be delivered on identified, previously developed sites between 2009 and 2026. A net contribution to housing supply will also be sought as part of the mixed use conversion or redevelopment of sites [need some sort of site size threshold here?] within Stanmore district centre and Harrow Weald local centre. Proposals for ten or more dwellings will be required to provide [50% or the maximum viable?] of the [dwellings or floorspace?] as affordable homes, taking into account the size and form of the homes required and the priority to be given to the delivery of other infrastructure requirements.

[sheltered housing opportunities? - Harrow Churches sites]

Stanmore will continue to function as a district centre offering a range of convenience and comparison retailing and associated town centre services. Within the centre, redevelopment appropriate to the centre's function will be supported. Provision for town centre uses commensurate with Stanmore's district catchment and function will be encouraged, but will be confined to appropriate A1, A2, A3, A4 & A5 uses at ground floor level within the primary shopping core. New premises must be viable in terms of size, layout and servicing [cross refer service road proposals in the RJ] arrangements, and be accessible to all. Special attention should be paid to the impact of redevelopment within the centre upon historic fabric within and adjoining the centre. Redevelopment should make an appropriate contribution to housing supply, commensurate with the centre's public transport accessibility level.

Harrow Weald will continue to function as a local centre offering 'top-up' convenience and specialist comparison retailing and associated A1, A2, A3, A4 & A5 uses. Within the centre, redevelopment commensurate to the centre's function and Metroland character will be supported, subject to the provision of appropriate uses and active frontage at ground floor level. New premises must be viable in terms of size, layout and servicing [cross refer service road proposals in the RJ] arrangements, and be accessible to all. Special attention should be paid to the impact of redevelopment within the centre upon flood risk. Redevelopment should make an appropriate contribution to housing supply commensurate with the centre's modest [define in RJ] public transport accessibility level.

Within the existing active frontages of non-town centre retail parades at Canons Corner, Kenton Lane, and Long Elmes, retail and other appropriate commercial or community uses will be retained at ground floor level.

The redevelopment or conversion of offices within Stanmore district centre will be expected to make provision for uses equivalent in economic or community value to the existing floorspace on the site [need to think about how this will be assessed and say something about it]. New premises must be viable in terms of size, layout and servicing arrangements, and be accessible to all.

Elsewhere, redevelopment and infill opportunities will be expected to reflect scale, pattern and appearance of the site's surroundings. Development on back gardens will be resisted, reflecting their contribution to the character of residential areas and as an environmental resource.

Priority will be given to transport investment which addresses the capacity of the junctions at High Road/Uxbridge Road and Canons Corner. The provision of car parking will be managed to ensure that new development supports a modal shift from private car use to more sustainable modes.

All development will be required to contribute to the delivery of strategic infrastructure in accordance with the Borough's Community Infrastructure Levy charging schedule. [say something here about specific infrastructure needed in the sub area based on borough/infrastructure delivery plans and LIP]. Provision for contributions or other requirements specific to the site or proposal will be expected to be made through a s.106 Planning Obligation.

Reasoned Justification

.2 Harrow Weald Ridge was identified as an Area of Special Character in the 1986 Harrow Borough Local Plan in recognition of the backdrop that its high ground, with extensive tree cover and major open areas, provides when viewed from the generally lower suburban areas. The designation was carried forward and incorporated into the Harrow Unitary Development Plan (1994) and again into the replacement Harrow Unitary Development Plan (2004). The important characteristics of the Harrow Weald Ridge Area of Special Character remain valid and equally important today.

.3 The Harrow Weald Ridge is also of cultural and social importance. The site of the Roman settlement of Svlloniaca, Saxon earthworks, and Bentley Priory which features as an identifiable building in the landscape, all provide links with the area's history. The Royal National Orthopaedic Hospital is an institution of national repute and occupies a large site within the Green Belt and is a major employer. [say something here about the planning permissions for RNOH and Bentley Priory? Current status etc?]

.4 Large parts of the Harrow Weald Ridge Area of Special Character are of recognised biodiversity value, including the Borough's two Sites of Special Scientific Interest, three [??] Local Nature Reserves and a number of Metropolitan Sites of Nature Conservation Importance. Statutory controls exist to safeguard Sites of Special scientific Importance. Harrow's Biodiversity Action Plan sets out actions for the protection and enhancement of biodiversity within the Borough.

.5 Irrespective of ownership, use, public accessibility and condition, all open space has an intrinsic value and will therefore be protected in quantitative terms. The open countryside to the north of the Borough forms a part of Greater London's Green Belt and continues to contribute to the purposes of including land in the Green Belt as set out in PPG 2, and will therefore be retained. In addition the Metropolitan Open Land at Stanmore Golf Course and Canons Park is of strategic importance and continues to comply with the relevant criteria for designation, and will therefore be retained. Together, Bentley Priory Open Space, Harrow Weald Common, Stanmore Common and Stanmore Country Park (including the forthcoming Wood Farm extension) provide ??Ha of public access to natural and semi-natural greenspace within the Green Belt. The London Loop strategic walking route and other public rights of way provide additional general public access to the Green Belt in this area and will therefore be protected and enhanced as part of the Borough's Green Grid.

.6 Harrow's Green Grid includes a schedule of projects to create an interconnected network of open spaces and river corridors throughout Harrow and across the Borough boundary. Within the Harrow Weald and Stanmore sub areas, the Belmont Trail group of projects will deliver the objective of improving accessibility from suburban areas in the south of the Borough to the opportunities for countryside recreation in this sub area, and the Green Belt group of projects will enhance the quality of facilities within the area.

.7 Harrow Weald and Stanmore falls within the north east sub area of the 2010 PPG 17 Study. The area is well served by open space, with the total level of accessible space above that generated by the recommended standards of provision. However this does not mean that there is a 'surplus' of space. The Study identifies a shortfall in the Borough as a whole of 117.38 hectares open space in 2010, projected to rise to 133.76 hectares in 2026, based upon recommended standards of provision per 1,000 population. For this reason, and in recognition of the wider sustainability role that open space plays within the urban environment⁰, all open space will be safeguarded and opportunities to increase it will be sought. Much of the sub area's open space also has a strategic function as Green Belt, Metropolitan Open Land and as statutory biodiversity designations.

.8 Notwithstanding satisfactory quantitative levels of provision across a number of open space typologies in the sub area, there remain some significant gaps in accessibility to open space within Harrow Weald and Stanmore. Whilst such gaps reflect the extensive Green Belt and Metropolitan Open Land areas, which are populated at comparatively low densities, there is a noticeable gap in provision across the residential areas between Harrow Weald local centre and Stanmore district centre. Opportunities will be sought in this area to, though on-site provision or other means, to address these accessibility deficiencies. All new development will be expected to make on-site provision for children's play.

.9 Stanmore and Harrow Weald benefit from indoor sports facilities at the Aspire National Centre and Bentley Wood High School. Continued community access to these facilities, with quality enhancements as appropriate, will be supported. Outdoor sport facilities include the Roger Banister Sports Ground as well as a number of sport club sites and pitches within public open space. Again however there is a significant gap in accessibility between Harrow Weald and Stanmore, and priority should be given to the provision of a multi-use games area on a site which maximises accessibility.

.10 Small scale opportunities for improved access to natural and semi-natural greenspace should focus on the western part of the area. Priority should be given to the restoration of the Belmont Trail link adjacent to Stanmore Golf Course, in order secure continues access along the trail.

.11 Opportunities will be sought in the Harrow Weald area to provide additional cemetery provision, in order to meet the future needs of the local population within the Borough.

.12 Detailed requirements for open space provision and contributions, informed by the 2010 Study, will be set out in development management policies, site allocations and a Community Infrastructure Levy as appropriate.

.13 Stanmore is rich in archaeological heritage, with Scheduled Ancient Monuments to safeguard areas of known Roman remains, the surviving Saxon earthworks at Grims Dyke and Pear Wood, and the Eighteenth Century Obelisk at Brockley Hill. Archaeological Priority Areas identify potential for further Roman remains at Brockley Hill and Canons Park, as well as identifying the possible site of the priory complex at Clamp Hill [check] and the extent of the Medieval village of Stanmore along Old Church Lane. The Council has also issued an advisory note in connection with the Grims Ditch scheduled ancient monument.

notably for biodiversity, natural drainage and flood storage, mitigation of air, light and noise pollution, and for general human health and wellbeing

.14 Other heritage designations reflect Harrow Weald and Stanmore's role in the rural landscape of Middlesex, the residence of wealthy families and the best of the area's early suburban growth. The extent of the historic estates of Grims Dyke House and Bentley Priory are reflected in their historic park and garden status. The Council is preparing supplementary planning documents for the Harrow Weald, Stanmore & Edgware which will incorporate appraisals and management strategies for the conservation areas within the Harrow Weald and Stanmore sub area. All heritage assets in the area will continue to be protected.

.15 The Borough's Strategic Flood Risk Assessment (2009) identifies parts of Stanmore as being at risk of flooding from the Edgware Brook. Development will be managed in accordance with the sequential and (where appropriate) exception tests set out in Planning Policy Statement 25: *Development and Flood Risk* (2006) to help manage risk from and increase resilience to flooding. An overall reduction in flood risk will be achieved through the use of sustainable urban drainage systems to achieve greenfield run-off rates in accordance with policy recommendations set out in the Assessment, to be brought forward through the Development Management Policies DPD. The Level 2 Strategic Flood Risk Assessment (2011) will be used in the preparation of the Site Allocations DPD to direct development appropriately in relation to the flood risk vulnerability of uses and the land's probability of flooding.

.16 Harrow's Housing Trajectory demonstrates capacity to provide [684] net additional homes on identified, previously developed sites within the Stanmore and Harrow Weald sub area, over the period 2009-2026. This includes schemes at the Royal National Orthopaedic Hospital and Bentley Priory, approved to secure their respective futures, and the potential redevelopment of Harrow College's Harrow Weald campus which is an identified major previously developed site within the Green Belt. Stanmore car park, within Stanmore district centre, and the adjoining vacant Amner Lodge, provide further identified opportunity for housing as part of an appropriate mixed-use redevelopment. Additional housing capacity will be sought from unforeseen opportunities on previously developed sites within Stanmore district centre and Harrow Weald local centre. The West London Strategic Housing Market Assessment demonstrates a requirement for [??] affordable homes across the sub-region and for [??] within the London Borough of Harrow. [something here about the conclusions of the viability assessment]. To ensure that all sites above the London Plan threshold of ten or more dwellings contributes to the delivery of the Borough's minimum requirement, or helps to exceed it, the maximum viable number of dwellings up to 50% of all the dwellings proposed on the site will be sought as affordable homes. [something here about the tenure and size mix][anything to add here that shows the level of need within the sub area/any specific requirements??]

Site	Site Area	Indicative Number of Units	Indicative Phasing
Jubilee House, Merrion Avenue	0.28	35	2015/16
Harrow College, Harrow Weald	2.5	154	2023/24, 2024/25
Amner Lodge and Car Park, Coverdale Close	0.67	136	2014/15
Royal National Orthopaedic Hospital, Brockley Hill	0.79	191	2014/15, 2015/16, 2016/17

Site	Site Area	Indicative Number of Units	Indicative Phasing
Douglas Close redevelopment	2.04	51	2013/14
RAF Bentley Priory	5.6	103	2013/14, 2014/15
Boxtree Public House	0.18	14	2013/14
		Total 684	

Housing Trajectory

.17 Harrow's Retail Study (2009) projects a modest increase of small convenience store floorspace over the period 2009-2026. In recognising the growth of service uses in recent years and the role that these can play in supporting overall town centre vitality and viability, the Study also recommends provision be made for A2, A3, A4 and A5 uses over the same period. Stanmore is recognised as a strong centre, represented by large convenience retailers and some national chain restaurants, but with heavy through-traffic detrimental to the environmental quality of the centre. The redevelopment of sites within Stanmore will be required to re-provide viable premises for retail and A2-A5 uses at ground floor and will need to pay special attention to historic fabric within and adjoining the centre. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the role and function of the centre and any potential impact upon other centres within the Borough.

.18 The Retail Study (2009) identifies potential of Stanmore car park to provide additional retail floorspace in Stanmore district centre, and may be brought forward as part of the separate Site Allocations DPD.

.19 As a local centre Harrow Weald has a modest role within the town centre hierarchy, providing mainly convenience shops and other services for the immediate locality. The redevelopment of sites within Hatch End local centre will be required to re-provide viable premises for retail and A2-A5 uses at ground floor. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the status of Hatch End as a local centre and any potential impact upon other centres within the Borough.

.20 Outside of town centres, the provision of local retail and associated service or community uses help to sustain the neighbourhoods in which they are situated by providing 'walk-to' convenience shopping and services, and particularly for more specialist businesses which might be uneconomic in town centres. For this reason, ground floor commercial premises at Canons Corner [add addresses as footnote] and Kenton Lane/Uxbridge Road, and Long Elmes [add addresses as footnote] will be retained for retail and appropriate service and community uses.

.21 Large office buildings constructed in the 1970s and 80s for single occupiers have become unsuited to the needs of the local economy and low office rents have resulted in a very limited supply of new space. Harrow town centre is the focus to provide a new, consolidated office market within the Borough. The mixed-use redevelopment or conversion of redundant office buildings in Stanmore district centre [and adjacent to Stanmore Underground Station??] therefore offers the opportunity to contribute to housing supply, but should also make provision for appropriate economic

uses (excluding main town centre uses) equivalent in value to the number of jobs previously supported on the site. Appropriate community uses may also be supported where the benefit of the use outweighs any loss in employment value.

.22 Harrow's suburban areas are a cherished part of the Borough's character and heritage, with many areas displaying strong coherence in design, proportions and pattern of development. The Character Assessment of Harrow's Residential Areas (2010) identifies within the residential suburbs of Harrow Weald and Stanmore a number of typologies from the post-war era, representing redevelopment or infill of earlier lower-density development, as well as modern large estates, smaller planned inter-war estates and areas of more spacious housing particularly to the north of the sub area. When development opportunities arise in suburban areas, substantial weight will be given to the wider setting of the site in determining the appropriate density, scale and form of development. These considerations will also apply to proposals for domestic development. A residential design guide has been published, as a supplementary planning document, which amplifies the appropriate considerations and detailed requirements.

.23 As with other forms of open space, gardens and allotments have a multiplicity of social and environmental benefits, including their positive impact on health and wellbeing, the opportunity for sustainable food production and natural drainage, and as a habitat for biodiversity. Harrow's Biodiversity Action Plan recognises the importance of allotments and gardens in the continued survival of species and habitats, and identifies among other threats the loss of these spaces to development. Amendments to PPS 3 excludes back gardens and allotments from the definition of 'previously developed land' and the London Plan makes provision for LDFs to introduce a presumption against development on back gardens. Harrow's housing trajectory identifies sufficient previously-developed sites to meet the Borough's housing target and policies within this strategy allow for other sites to be brought forward in strategically preferable locations. Development of designated open space (including allotments) and back gardens is therefore strategically unnecessary and will be resisted.

.24 Harrow's Transport Study (2010) identifies potential future capacity problems at the Canons Corner (London Road/Spur Road/Brockley Hill) and at the Uxbridge Road/High Road roundabout. Opportunities will be sought through the Borough Investment Plan and development to secure the proper functioning of these junctions in the long term.

.25 Household car ownership across the Harrow Weald and Stanmore sub area is generally high. The high level of car ownership across the Borough means that encouraging car owners to change their mode of transport to a more sustainable form such as public transport or, particularly for shorter trips cycling and walking, is a significant challenge. The London Plan sets out maximum parking standards and these will be applied, alongside the spatial co-ordination of development with public transport accessibility and services set out in this strategy, to encourage a more sustainable lifestyle.

.26 The Community Infrastructure Levy Regulations enable local planning authorities to collect from individual developments financial contributions towards infrastructure made necessary by development across the Borough. Infrastructure requirements have been assessed and identified in the Council's Infrastructure Delivery Plan incorporating relevant provisions from the Borough Investment Plan for housing and the Local Implementation Plan for Transport, as well as specific requirements arising from the Biodiversity Action Plan, the management strategies for specific conservation areas, and the documented needs of other community service providers such as the

Harrow NHS. The Council will publish a CIL charging schedule following the adoption of this Core Strategy. In accordance with the Regulations, where a specific requirement arises from a particular site or development proposal, this should be provided-for by a Planning Obligation.

Relationship with Harrow Sustainable Community Plan

.27 Relevant short-term actions (delete as appropriate to sub area policy)

- increase provision of affordable housing
- Increase sustainability/air quality by reducing car use as mode of travel to school
- Improve street and environmental cleanliness
- Increase domestic waste recycling and composting
- Undertake tree replacement programme (relate to green grid actions?)
- Deliver decent homes standard to Council owned homes
- Implement biodiversity action plan (relevant actions?)
- Regenerate rayners lane and mill farm
- Improve the safety of journeys between home and school
- Reduce the number of empty homes and households in temporary accommodation
- Develop more extra care housing
- Increase migrants' english language schools and knowledge (d1 uses in offices?)

.28 Relevant ambitions (delete as appropriate to sub area policy)

- Employment land is maintained and enhanced to provide local residents with the opportunity to work within the Borough
- Business occupancy is maintained and new businesses are attracted to Harrow
- Major new businesses are committed to training and skills through planning conditions
- Tourism to continue to support the local economy and create local employment
- Schools rebuilt/remodelled (ambition relates to now defunct BSF)
- New developments are aligned with transport routes
- Transport routes are aligned with high density development
- Residents have a choice of good quality and affordable housing in a variety of tenures, in particular improve the availability of larger family housing
- Increase the use of sustainable energy
- Work closely with TfL to improve the access and reliability of public transport
- There is easy and convenient access to footpaths, cycle paths and public transport to promote the use of more sustainable modes of transport for local journeys
- New developments are of a high quality design and are appropriate in terms of their scale, size and location
- High density development includes provision for mixed use activities on site
- Harrow's existing heritage buildings and sites are preserved and enhanced
- There is a balance and variety of well managed and accessible green spaces, and the Green Belt and biodiversity is protected and improved
- The growth of waste is reduced through improved awareness of waste issues and the importance of waste reduction
- Waste will be diverted from landfill by focusing on increasing the amount of waste we recycle and compost
- There is continued investment to improve social housing and public infrastructure (roads, public spaces and street lighting)

- There will be a range of learning, leisure and cultural opportunities
- There will continue to be a range of arts and sports facilities that are accessible to everyone
- The accommodation needs of Gypsies and Travellers will be met to enable them to raise their families in a safe and healthy environment
- Harrow will continue to be one of the safest boroughs in London
- Services are more personalised and neighbourhood focused

Harrow Vitality Profiles

.29 One of the lowest population densities.

.30 Harrow Weald is one of the wards with the most barriers to Housing and Services - IMD 2007.

.31 Large number of pensioners.

Edgware & Burnt Oak

Draft Core Strategy (Pre-Submission) for O&S

Edgware & Burnt Oak

.1 Introductory paragraphs here

Policy CS 7

Edgware and Burnt Oak

Recognising Harrow's proximity to, and shared town centre boundaries of Edgware and Burnt Oak with Barnet, the council will work with Barnet council and the GLA to coordinate development in this area. The close proximity of the growth area of Burnt Oak / Colindale as part of the North West London Co-ordination Corridor and its potential to provide jobs and services for nearby Harrow residents will be utilised to secure improved orbital transport links. Opportunities to produce joint policy and regeneration guidance documents will be explored with partners where necessary.

The parts of both Burnt Oak and Edgware centres that fall within Harrow will continue to function as a peripheral part of Burnt Oak and Edgware district centres, offering a range of convenience and comparison retailing and associated town centre services. Within this part of the two centres, redevelopment appropriate to the centre's function will be supported. Provision for town centre uses commensurate with their district catchment and function will be encouraged. New premises must be viable in terms of size, layout and servicing arrangements, and be accessible to all. Special attention should be paid to the impact of redevelopment upon the Metroland character of the centre. Redevelopment should make an appropriate contribution to housing supply, commensurate with the public transport accessibility level of this part of the centre, and opportunities to improve the public realm and relationship with the rest of the centre will be sought.

The maximum contribution that non-retail commercial uses are to make of a particular centre will be set out in the Development Management Policies DPD.

Within the Spring Villas [business use] area to the south of Edgware centre, redevelopment or conversion appropriate to the area's public transport accessibility and character will be promoted. Proposals will be expected to make provision for uses (excluding main town centre uses) equivalent in economic or community value to the existing floorspace on the site [need to think about how this will be assessed and say something about it]. The rejuvenation of Ballard Mews will be supported to provide employment generating industrial and business uses suitable to its surroundings. The sequential and exception test will be applied in areas of this site subject to flood risk. Any development in Spring Villas or Ballard Mews will need to have regard to the areas of the site designated as an Archaeological Priority Area in line with guidance in PPS5.

A minimum of [1,128] homes will be delivered on identified, previously developed sites between 2009 and 2026. A net contribution to housing supply will also be sought as part of the mixed use conversion or redevelopment of sites [need some sort of site size threshold here?] within both District Centres. Proposals for ten or more dwellings will be required to provide [50% or the maximum viable?] of the [dwellings or floorspace?] as affordable homes, taking into account the size and form of the homes required and the priority to be given to the delivery of other infrastructure requirements.

Any redevelopment and infill opportunities elsewhere will be expected to reflect the scale, pattern and appearance of the site's surroundings. Development on back gardens will be resisted, reflecting their contribution to the character of residential areas and as an environmental resource.

The boundaries, strategic function and character of the Metropolitan Open Land at Canons Park will be maintained. Inappropriate uses and development of the Green Belt and other open space will be resisted. There will be a presumption against any net loss of open space. Inappropriate uses and development of open space will be resisted. Opportunities to enhance the biodiversity value of open space and other appropriate sites in this area will be sought. Opportunities to address deficiencies in Access to Nature will be supported. Green Grid projects which improve links to the Green Belt via the Belmont Trail will be prioritised.

All development will be required to make provision for playspace, with the presumption in favour of on-site provision. Where there are opportunities for additional open space on sites, priority will be given to pocket parks and amenity greenspaces in locations with poor existing accessibility. Continued community access to existing public and private facilities will be supported, and opportunities for increased access will be sought. Investment to address other deficiencies in open space provision will focus upon natural and semi-natural greenspace and projects which enhance the accessibility, quality and value of existing sites; contributions towards such investment will be sought through a Community Infrastructure Levy.

Edgware and Burnt Oak's heritage assets, comprising its conservation areas (Edgware), listed buildings, and historic parks & gardens will be preserved and enhanced. Sites of identified archaeological importance will be protected.

The Council will apply the sequential and, where appropriate, exception tests to the allocation of development sites and to development proposals. Development will be managed with the aim of achieving an overall reduction in flood risk and to increase resilience to flood events. The capacity of the functional floodplain within greenfield sites will be maintained and opportunities to enhance or re-instate the functional flood plain on previously-developed sites will be sought. River restoration and deculverting projects should achieve integrated flood management, biodiversity and where appropriate public access benefits.

Priority will be given to transport investment which addresses the capacity of the junctions at

- London Road/Spur Road/Brockley Hill (Brockley Hill arm)
- Uxbridge Road/High Road roundabout (Uxbridge Road arms)
- Whitchurch Lane/Honeypot Lane (all arms)

The provision of car parking will be managed to ensure that new development supports the role and function of these centres.

All development will be required to contribute to the delivery of strategic infrastructure in accordance with the Borough's Community Infrastructure Levy charging schedule. **[say something here about specific infrastructure needed in the sub area based on borough/infrastructure delivery plans and LIP]**. Provision for contributions or other requirements specific to the site or proposal will be expected to be made through a s.106 Planning Obligation.

Justification

.2 Burnt Oak/Colindale growth areas form part of a coordination corridor identified by the Mayor of London within The London Plan. This designation is in recognition of the level of future development that will occur along the corridor. It is important that Harrow works with the borough of Brent and Barnet as well as the GLA and TfL to ensure that development does not put undue pressure on local infrastructure and that opportunities for local job growth and transport improvements are maximised. An assessment of the implications of development has been commissioned by the North London Strategic Alliance. This builds on assessments already made in drawing up the North London Development and Investment Framework, published by the LDA in 2007 and on work being undertaken by TfL.

.3 Harrow's Retail Study (2009) projects a modest increase of small convenience store floorspace over the period 2009-2026. In recognising the growth of service uses in recent years and the role that these can play in supporting overall town centre vitality and viability, the Study also recommends provision be made for A2, A3, A4 and A5 uses over the same period. Edgware is recognised as a strong centre, represented by convenience retailers and some larger comparison stores in the area of the centre in Barnet. Burnt Oak similarly is functioning as a convenience but with lower-order comparison shopping centre. Heavy through-traffic is detrimental to the environmental quality of both of these centres, especially along the A5. The redevelopment of sites within these centres will be required to re-provide viable premises for retail and A2-A5 uses at ground floor. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the role and function of the centre and any potential impact upon other centres within the Borough.

.4 Office and industrial units constructed in the 1970s and 80s in this area have become unsuited to the needs of the local economy and low office rents have resulted in a very limited supply of new space. Harrow town centre is the focus to provide a new, consolidated office market within the Borough. The mixed-use redevelopment or conversion of redundant office buildings in Spring Villas and Ballard Mews Business Use Areas therefore offers the opportunity to contribute to housing supply, but should also make provision for appropriate economic uses (excluding main town centre uses) equivalent in value to the number of jobs previously supported on the site. Appropriate community uses may also be supported where the benefit of the use outweighs any loss in employment value.

.5 Harrow's Housing Trajectory demonstrates capacity to provide [1,128] net additional homes on identified, previously developed sites within the Edgware and Burnt Oak sub area, over the period 2009-2026. This includes schemes at the Former Government Buildings at Honeypot Lane, and at Edgware Town Football Club, which makes up the bulk of the identified housing development. Additional housing capacity will be sought from unforeseen opportunities on previously developed sites within both centres. The West London Strategic Housing Market Assessment demonstrates a requirement for [??] affordable homes across the sub-region and for [??] within the London Borough of Harrow. [something here about the conclusions of the viability assessment]. To ensure that all sites above the London Plan threshold of ten or more dwellings contributes to the delivery of the Borough's minimum requirement, or helps to exceed it, the maximum viable number of dwellings up to 50% of all the dwellings proposed on the site will be sought as affordable homes. [something here about the tenure and size mix][anything to add here that shows the level of need within the sub area/any specific requirements??]

.6 Harrow's suburban areas are an important part of the Borough's character and heritage, with many areas displaying strong coherence in design, proportions and pattern of development. The Character Assessment of Harrow's Residential Areas (2010) identifies within the residential suburbs of Edgware and Burnt Oak a number of typologies from the post-war era, representing redevelopment or infill of earlier lower-density development, as well as more historic development. When development opportunities arise in suburban areas, substantial weight will be given to the wider setting of the site in determining the appropriate density, scale and form of development. These considerations will also apply to proposals for domestic development. A residential design guide has been published, as a supplementary planning document, which amplifies the appropriate considerations and detailed requirements.

.7 As with other forms of open space, gardens and allotments have a multiplicity of social and environmental benefits, including their positive impact on health and wellbeing, the opportunity for sustainable food production and natural drainage, and as a habitat for biodiversity. Harrow's Biodiversity Action Plan recognises the importance of allotments and gardens in the continued survival of species and habitats, and identifies among other threats the loss of these spaces to development. Amendments to PPS 3 excludes back gardens and allotments from the definition of 'previously developed land' and the London Plan makes provision for LDFs to introduce a presumption against development on back gardens. Harrow's housing trajectory identifies sufficient previously-developed sites to meet the Borough's housing target and policies within this strategy allow for other sites to be brought forward in strategically preferable locations. Development of designated open space (including allotments) and back gardens is therefore strategically unnecessary and will be resisted.

.8 Irrespective of ownership, use, public accessibility and condition, all open space has an intrinsic value and will therefore be protected in quantitative terms. The Metropolitan Open Land at Canons Park is of strategic importance and continues to comply with the relevant criteria for designation, and will therefore be retained. Harrow's Biodiversity Action Plan sets out actions for the protection and enhancement of biodiversity within the Borough.

.9 Harrow's Green Grid includes a schedule of projects to create an interconnected network of open spaces and river corridors throughout Harrow and across the Borough boundary. Within the Edgware and Burnt Oak sub areas, the Belmont Trail group of projects will deliver the objective of improving accessibility from suburban areas in the south of the Borough to the opportunities for countryside recreation in this sub area.

.10 Edgware and Burnt Oak span across parts of two of the 2010 PPG 17 Study sub areas⁰. The Study identifies a shortfall, based upon recommended standards per 1,000 population, of 34.19 hectares in the south-east sub area and adequate provision in the north-east sub area in 2010. The south-east sub area shortfall is projected to rise to 39.51 hectares in 2026. The comparable shortfall for the Borough as a whole stands at 117.38 hectares and is projected to rise to 133.76 hectares by 2026. For this reason, and in recognition of the wider sustainability role that open space plays within the urban environment⁰, all open space will be safeguarded and opportunities to increase it will be sought.

Burnt Oak (Edgware ward) in the south-east sub area; and Edgware (part of Canons ward) in the north-east sub area notably for biodiversity, natural drainage and flood storage, mitigation of air, light and noise pollution, and for general human health and wellbeing

.11 The Hive Centre at Prince Edward Playing Fields provides a major new sports facility at the interface of the Edgware and Burnt Oak area with the Kingsbury and Queensbury area. Other outdoor sport facilities are provided at Chandos Recreation Ground; however investment to increase provision of and accessibility to multi-use games areas should focus on the north part of the Edgware and Burnt Oak area. Enhancement of facilities at Canons Park should focus on fulfilling the site's potential to provide youth space.

.12 New development will be expected to be provided for children's play. A significant area of deficiency in access to local natural and semi-natural greenspace, amenity greenspace and parks exists in the south part of the Edgware and Burnt Oak area. Opportunities to address these deficiencies will be sought, through on site provision and investment in existing spaces as appropriate. Priority will be given to the Brent River group of Green Grid projects which enhance access to and the biodiversity value of the Rivers tributaries. Enhancement of the [Dalkeith Grove] natural and semi-natural site, to enhance its quality and value, will also be sought.

.13 Allotments will continue to meet the needs of local residents in Edgware and Burnt Oak, and of the Borough as a whole; investment should focus on the return to use of the Roch Avenue allotments site and qualitative improvement at Chandos Recreation Ground allotments. Any site no longer required for allotment gardening over the plan period will be safeguarded to address the shortfall in accessible natural and semi-natural greenspace.

.14 Detailed requirements for open space provision and contributions, informed by the 2010 Study, will be set out in development management policies, site allocations and a Community Infrastructure Levy as appropriate.

.15 This area of the Borough is rich in archaeological heritage, with Archaeological Priority Areas to safeguard areas of known Roman Tile works in Canons Park, and the Medieval settlement of Edgware. This designations reflect this and the wider areas role in the rural landscape of Middlesex, and historic settlements. The extent of the historic estates of the Duke of Chandos which now survives as Canons Park is reflected in it's historic park and garden status. The Council is preparing supplementary planning documents for the Stanmore & Edgware Conservation Area which will incorporate appraisals and management strategies for the conservation areas within the Edgware sub area. All heritage assets in the area will continue to be protected.

.16 The Borough's Strategic Flood Risk Assessment (2009) identifies parts of Edgware as being at risk of flooding from the Edgware Brook. Development will be managed in accordance with the sequential and (where appropriate) exception tests set out in Planning Policy Statement 25: *Development and Flood Risk* (2006) to help manage risk from and increase resilience to flooding. An overall reduction in flood risk will be achieved through the use of sustainable urban drainage systems to achieve greenfield run-off rates in accordance with policy recommendations set out in the Assessment, to be brought forward through the Development Management Policies DPD. The Level 2 Strategic Flood Risk Assessment (2011) will be used in the preparation of the Site Allocations DPD to direct development appropriately in relation to the flood risk vulnerability of uses and the land's probability of flooding.

.17 Harrow's Transport Study (2010) identifies potential future capacity problems at:

- London Road/Spur Road/Brockley Hill (Brockley Hill arm)
- Uxbridge Road/High Road roundabout (Uxbridge Road arms)
- Whitchurch Lane/Honeypot Lane (all arms)

.18 . Opportunities will be sought through the Borough Investment Plan and development to secure the proper functioning of these junctions in the long term.

.19 The Community Infrastructure Levy Regulations enable local planning authorities to collect from individual developments financial contributions towards infrastructure made necessary by development across the Borough. Infrastructure requirements have been assessed and identified in the Council's Infrastructure Delivery Plan incorporating relevant provisions from the Borough Investment Plan for housing and the Local Implementation Plan for Transport, as well as specific requirements arising from the Biodiversity Action Plan, the management strategies for specific conservation areas, and the documented needs of other community service providers such as the Harrow NHS. The Council will publish a CIL charging schedule following the adoption of this Core Strategy. In accordance with the Regulations, where a specific requirement arises from a particular site or development proposal, this should be provided-for by a Planning Obligation.

Housing Trajectory Sites

Site	Site Area	Indicative Number of Units	Indicative Phasing
287-293 Whitchurch Lane	0.16	10	2011/12
Former Government Buildings, Honeypot Lane	6.1	795	2010/11, 2011/12, 2012/13, 2013/14, 2014/15, 2015/16
Chandos Parade, Buckingham Road	0.08	10	2010/11
Former clinic/scout hut, Tenby Road	0.2	10	2010/11
Bacon Lane	0.26	28	2015/16
47 & 49 High Street	0.27	86	2023/24
Edgware Town FC	1.22	189	2013/14, 2014/15, 2015/16
		Total 1,128	

Housing Trajectory

Evidence Studies

.20 Burnt Oak District Centre - straddles boundary with LB Barnet

.21 Edgware District Centre - straddles boundary with LB Barnet

Retail Study

.22 Burnt Oak (only):

- medium sized linear centre functioning as a convenience and lower-order comparison shopping centre; plus some banks/services and entertainment; proportion of vacancy below the national average
- reasonable representation of national retailers in the centre as a whole
- off street parking provided at Tesco and Burnt Oak station
- heavy traffic on A5 a significant barrier to movement
- traffic is the principal environmental issue, otherwise a reasonable environment
- no changes to retail frontage recommended
- no development opportunities identified

Employment Land Study

.23 Ballard Mews, Edgware Road - 0.7 hectares - scores 15. Offices, car repair, retail and residential uses. Majority of site in poor condition with 1970s buildings. Narrow access road. Situated in a residential area and in an archaeological priority area. Allocated business use area close to Edgware centre.

.24 Spring Villa Park - 1.1 hectares - scores 21. Small office development. Good access. Mostly fully let. Allocated business use area close to Edgware centre but within archaeological priority area and identified as at risk of flooding.

Transport Study

.25 Highway junctions with potential future capacity problems:

- London Road/Spur Road/Brockley Hill (Brockley Hill arm)
- Uxbridge Road/High Road roundabout (Uxbridge Road arms)
- Whitchurch Lane/Honeypot Lane (all arms)

.26 Buses

- no capacity issues at 8.35% passenger growth (sensitivity testing shows impact upon one service through Stanmore)

.27 Underground (taking into account planned capacity improvements)

- Jubilee line: no capacity problems

West London SHMA/Viability Study/Housing Capacity

PPG 17 Study

Strategic Flood Risk Assessment

.28 Part of the Brent Catchment - Edgware Brook. Area of flood risk zone 2 and 3 from Edgware centre heading west. Reservoir at Seven Acre Lake. Flood storage areas at Whitchurch Playing Fields and Prince Edwar Playing Fields.

Character Study**Contextual Stuff****London Plan designations****Relationship with Harrow Sustainable Community Plan****.29** Relevant short-term actions (delete as appropriate to sub area policy)

- increase provision of affordable housing
- Increase sustainability/air quality by reducing car use as mode of travel to school
- Improve street and environmental cleanliness
- Increase domestic waste recycling and composting
- Undertake tree replacement programme (relate to green grid actions?)
- Deliver decent homes standard to Council owned homes
- Implement biodiversity action plan (relevant actions?)
- Regenerate rayners lane and mill farm
- Improve the safety of journeys between home and school
- Reduce the number of empty homes and households in temporary accommodation
- Develop more extra care housing
- Increase migrants' english language schools and knowledge (d1 uses in offices?)

.30 Relevant ambitions (delete as appropriate to sub area policy)

- Employment land is maintained and enhanced to provide local residents with the opportunity to work within the Borough
- Business occupancy is maintained and new businesses are attracted to Harrow
- Major new businesses are committed to training and skills through planning conditions
- Tourism to continue to support the local economy and create local employment
- Schools rebuilt/remodelled (ambition relates to now defunct BSF)
- New developments are aligned with transport routes
- Transport routes are aligned with high density development
- Residents have a choice of good quality and affordable housing in a variety of tenures, in particular improve the availability of larger family housing
- Increase the use of sustainable energy
- Work closely with TfL to improve the access and reliability of public transport
- There is easy and convenient access to footpaths, cycle paths and public transport to promote the use of more sustainable modes of transport for local journeys
- New developments are of a high quality design and are appropriate in terms of their scale, size and location
- High density development includes provision for mixed use activities on site
- Harrow's existing heritage buildings and sites are preserved and enhanced
- There is a balance and variety of well managed and accessible green spaces, and the Green Belt and biodiversity is protected and improved
- The growth of waste is reduced through improved awareness of waste issues and the importance of waste reduction
- Waste will be diverted from landfill by focusing on increasing the amount of waste we recycle and compost

- There is continued investment to improve social housing and public infrastructure (roads, public spaces and street lighting)
- There will be a range of learning, leisure and cultural opportunities
- There will continue to be a range of arts and sports facilities that are accessible to everyone
- The accommodation needs of Gypsies and Travellers will be met to enable them to raise their families in a safe and healthy environment
- Harrow will continue to be one of the safest boroughs in London
- Services are more personalised and neighbourhood focused

Harrow Vitality Profiles

- .31** Canons has the lowest number of working age people out of work.
- .32** Highest incidents of fly - tipping in Edgware - 264 - average of 20.

Kingsbury & Queensbury

Draft Core Strategy (Pre-Submission) for O&S

Kingsbury & Queensbury

Introduction

.1 The Kingsbury and Queensbury sub areas in the south eastern corner of the borough is one of the most densely populated areas and borders Brent to the South. The area is predominantly suburban, typified by relatively dense, inter-war estates. The south eastern most corner of this area contains the densest housing development, with narrow streets and poor public realm due to a loss of character through extensions and the loss of gardens. Further north and west, the areas character has generally been retained, although again, the suburban layout is dense in comparison to other areas of the borough.

.2 Two town centres serve this area, with Kingsbury District centre being the largest, which straddles the boundary with Brent, where the majority of shops are located. Queensbury is a designated local center, and serves as a more convenience shopping centre. Both centres have good accessibility by public transport, being served by the Jubilee line, and major bus routes. Heavy traffic passes through Kingsbury along the Kenton Road, and public realm improvements in both centres are necessary.

.3 The area benefits from reasonable access to open spaces, and is the proud home of Barnet FCs training centre and a footballing centre of excellence at the Hive on Prince Edward Playing Fields. The area is part of the Brent catchment, with the Kenton Brook, part of which is culverted flowing through the area. This results in some areas of residential land being the subject of flood risk to the north of Kingsbury centre.

.4 Honeypot Lane is host to an industrial and business use park, part of which has been redeveloped for residential use to the north of this area. This strategic employment area provides many jobs for the area and is an important business destination. The site has reasonable public transport access, primarily through the Jubilee line station at Canons Park.

Box 3

Objectives

1. To improve the public realm of Kingsbury and Queensbury centres
2. To safeguard Honeypot Lane Industrial and Business estate as a location for economic development
3. Support appropriate development in the town centres to enhance their vitality
4. To maintain community access to sport and recreation facilities and encourage enhancement
5. To retain all forms of open space in the area
6. To improve the character of residential areas in the area through public realm improvements
7. To resist development of back gardens in the area
8. To reduce the areas flood risk through de-culverting, re-development and open space retention

Policy CS 8

Kingsbury and Queensbury

There will be a presumption against any net loss of open space. Inappropriate uses and development of open space will be resisted. Opportunities to enhance the biodiversity value of open space and other appropriate sites in this area will be sought. Green Grid projects which improve links to the Green Belt via the Belmont Trail, and which restore and improve access to Kenton Brook, will be prioritised. Prince Edward Playing Fields will be maintained and as an important sporting destination, as home to Barnet FC training facilities and football centre of excellence.

The area fronting Kingsbury roundabout and the adjacent part of Kenton Road will continue to function as a peripheral part of Kingsbury district centre, offering a range of convenience and comparison retailing and associated town centre services. Within this part of the centre, redevelopment appropriate to the centre's function will be supported. Provision for town centre uses commensurate with Kingsbury's district catchment and function will be encouraged. New premises must be viable in terms of size, layout and servicing arrangements, and be accessible to all. Special attention should be paid to the impact of redevelopment upon the Metroland character of the centre. Redevelopment should make an appropriate contribution to housing supply, commensurate with the public transport accessibility level of this part of the centre, and opportunities to improve the public realm and relationship with the rest of the centre will be sought.

Queensbury will continue to function as a local centre offering 'top-up' convenience and specialist comparison retailing and associated A1, A2, A3, A4 & A5 uses. Within the centre, redevelopment commensurate to the centre's function and Metroland character will be supported, subject to the provision of appropriate uses and active frontage at ground floor level. New premises must be viable in terms of size, layout and servicing arrangements, and be accessible to all. Special attention should be paid to the impact of redevelopment within the centre upon flood risk. Redevelopment should make an appropriate contribution to housing supply commensurate with the centre's modest [define in RJ] public transport accessibility level.

A net contribution to housing supply will also be sought as part of the mixed use conversion or redevelopment of sites [need some sort of site size threshold here?] within Kingsbury district centre (Harrow part) and Queensbury local centre.

Any redevelopment and infill opportunities elsewhere will be expected to reflect the scale, pattern and appearance of the site's surroundings. Development on back gardens will be resisted, reflecting their contribution to the character of residential areas and as an environmental resource.

The Council will apply the sequential and, where appropriate, exception tests to the allocation of development sites and to development proposals. Development will be managed with the aim of achieving an overall reduction in flood risk and to increase resilience to flood events. The capacity of the functional floodplain within greenfield sites will be maintained and

opportunities to enhance or re-instate the functional flood plain on previously-developed sites will be sought. River restoration and deculverting projects should achieve integrated flood management, biodiversity and where appropriate public access benefits.

The Honeypot Lane industrial business park will be retained for appropriate B1, B2 and B8 uses. Investment will be sought to improve the quality and attractiveness of this strategic site. Redevelopment to provide new premises must be viable in terms of size, layout and servicing arrangements, and be accessible to all.

Priority will be given to transport investment which addresses the capacity of the junctions at Queensbury Circle roundabout and at the Whitchurch Lane/Honeypot Lane junctions. The provision of car parking will be managed to ensure that new development supports a modal shift from private car use to more sustainable modes.

All development will be required to contribute to the delivery of strategic infrastructure in accordance with the Borough's Community Infrastructure Levy charging schedule. [say something here about specific infrastructure needed in the sub area based on borough/infrastructure delivery plans and LIP]. Provision for contributions or other requirements specific to the site or proposal will be expected to be made through a s.106 Planning Obligation.

Reasoned Justification

.5 Irrespective of ownership, use, public accessibility and condition, all open space has an intrinsic value and will therefore be protected in quantitative terms. Greenspace Information for London (for the GLA) show that large parts of Kingsbury and Queensbury are deficient in access to sites of importance to nature conservation. Harrow's Green Grid includes a schedule of projects to create an interconnected network of open spaces and river corridors throughout Harrow and across the Borough boundary. Within the Kingsbury and Queensbury sub area, the River Brent group of projects will deliver the objective of improving the quality and accessibility of watercourses, and the strategic street tree planting group of projects will deliver the objective of greening links through the urban area between existing open spaces.

.6 Kingsbury and Queensbury falls within the south-east sub area of the 2010 PPG 17 Study. The Study identifies a shortfall in the sub area of 34.19 hectares open space in 2010, projected to rise to 39.51 hectares in 2026, based upon recommended standards of provision per 1,000 population. The comparable shortfall for the Borough as a whole stands at 117.38 hectares and is projected to rise to 133.76 hectares by 2026. For this reason, and in recognition of the wider sustainability role that open space plays within the urban environment⁰, all open space will be safeguarded and opportunities to increase it will be sought.

.7 The Hive Centre at Prince Edward Playing Fields provides a major new sports facility at the interface of the Kingsbury and Queensbury area with the Edgware and Burnt Oak area. Investment to increase provision of and accessibility to multi-use games areas and youth space on Queensbury Recreation Ground or nearby, and additional teenage playspace facilities will be sought to close a gap in provision in the Queensbury area.

notably for biodiversity, natural drainage and flood storage, mitigation of air, light and noise pollution, and for general human health and wellbeing

.8 Kingsbury and Queensbury are served by Centenary Park and Queensbury Recreation Ground, within the Borough, and to a lesser extent⁰ by Woodcock Park within the London Borough of Brent. Available investment in parks will be directed towards qualitative improvements at Centenary Park and Queensbury Recreation Ground, and opportunities will be sought to promote their facilities to those of a district park. Green Grid projects which enhance accessibility to district parks will be prioritised.

.9 Throughout the area there is a high deficiency of playspace and amenity greenspace. New development will be expected to provided for children's play and to combine this with additional amenity greenspace where appropriate. Kingsbury and Queensbury also lack natural and semi-natural greenspace, although Fryant Country Park within the London Borough of Brent is situated nearby⁰. Priority will be given to the Kenton Brook Green Grid project, part of the Brent River group of projects, which will enhance access to and the biodiversity value of the part of the brook which flows through Queensbury Recreation Ground. Other opportunities to enhance access to nature at neighbourhood level will also be supported.

.10 Allotments will continue to meet the needs of local residents in Kingsbury and Queensbury, and of the Borough as a whole. Investment should focus on the return to use of the Roch Avenue allotments site, the catchment of which contributes to accessibility of provision in this area. Any site no longer required for allotment gardening over the plan period will be safeguarded to to address the shortfall in accessible natural and semi-natural greenspace.

.11 Detailed requirements for open space provision and contributions, informed by the 2010 Study, will be set out in development management policies, site allocations and a Community Infrastructure Levy as appropriate.

.12 The Borough's Strategic Flood Risk Assessment (2009) identifies parts of Kingsbury and Queensbury as being at risk of flooding from the Kenton Brook and the Edgware Brook respectively. Development will be managed in accordance with the sequential and (where appropriate) exception tests set out in Planning Policy Statement 25: *Development and Flood Risk* (2006) to help manage risk from and increase resilience to flooding. An overall reduction in flood risk will be achieved through the use of sustainable urban drainage systems to achieve greenfield run-off rates in accordance with policy recommendations set out in the Assessment, to be brought forward through the Development Management Policies DPD. The Level 2 Strategic Flood Risk Assessment (2011) will be used in the preparation of the Site Allocations DPD to direct development appropriately in relation to the flood risk vulnerability of uses and the land's probability of flooding.

.13 Housing capacity will be sought from unforeseen opportunities on previously developed sites within Kingsbury district centre and Queensbury local centre. The West London Strategic Housing Market Assessment demonstrates a requirement for [??] affordable homes across the sub-region and for [??] within the London Borough of Harrow. [something here about the conclusions of the viability assessment]. To ensure that all sites above the London Plan threshold of ten or more dwellings contributes to the delivery of the Borough's minimum requirement, or helps to exceed it, the maximum viable number of dwellings up to 50% of all the dwellings proposed on the site will be sought as affordable homes. [something here about the tenure and size mix][anything to add here that shows the level of need within the sub area/any specific requirements??]

Kenton Road is a significant physical barrier
but again Kenton Road represents a significant physical barrier

.14 Harrow's Retail Study (2009) projects a modest increase of small convenience store floorspace over the period 2009-2026. In recognising the growth of service uses in recent years and the role that these can play in supporting overall town centre vitality and viability, the Study also recommends provision be made for A2, A3, A4 and A5 uses over the same period. Kingsbury is identified as functioning primarily as a convenience and service centre, with limited environmental quality due to heavy traffic along heavy through-traffic. The redevelopment of sites within the Harrow part of Kingsbury will be required to re-provide viable premises for retail and A2-A5 uses at ground floor and will need to contribute to the environmental enhancement of the centre. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the role and function of the centre and any potential impact upon other centres within the Borough.

.15 The Retail Study (2009) identifies potential of land at the junction of Kenton Road and Honeypot Lane to provide additional retail floorspace in this part of Kingsbury district centre, and may be brought forward as part of the separate Site Allocations DPD.

.16 As a local centre Queensbury has a modest role within the town centre hierarchy, providing mainly convenience shops and other services for the immediate locality. The redevelopment of sites within Queensbury local centre will be required to re-provide viable premises for retail and A2-A5 uses at ground floor. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the status of Queensbury as a local centre and any potential impact upon other centres within the Borough.

.17 Outside of town centres, the provision of local retail and associated service or community uses help to sustain the neighbourhoods in which they are situated by providing 'walk-to' convenience shopping and services, and particularly for more specialist businesses which might be uneconomic in town centres. For this reason, ground floor commercial premises at Honeypot Lane (adjacent Everton Drive) [add addresses as footnote] will be retained for retail and appropriate service and community uses.

.18 The Honeypot Lane industrial business park is identified as a strategic industrial location within the London Plan. Harrow's Employment Land Study (2010) forecasts an overall contraction in traditional 'B' class employment floorspace but a net increase in office space over the period 2007-2026 and identifies the Honeypot Lane/Dalston Gardens complex as a comparatively poor quality site. Nevertheless, the release of non-office 'B' class space will need to be carefully monitored and managed to ensure that good quality provision, which will continue to make a contribution to the local economy, is protected. As part of London's strategic reservoir of strategic industrial land, the Honeypot Lane industrial business park will be safeguarded for appropriate B1, B2 and B8 uses.

.19 Harrow's suburban areas are a cherished part of the Borough's character and heritage, with many areas displaying strong coherence in design, proportions and pattern of development. The Character Assessment of Harrow's Residential Areas (2010) identifies within the residential suburbs of Kingsbury and Queensbury predominantly inter-war and garden suburb estates. When development opportunities arise in suburban areas, substantial weight will be given to the wider setting of the site in determining the appropriate density, scale and form of development. These considerations will also apply to proposals for domestic development. A residential design guide has been published, as a supplementary planning document, which amplifies the appropriate considerations and detailed requirements.

.20 As with other forms of open space, gardens and allotments have a multiplicity of social and environmental benefits, including their positive impact on health and wellbeing, the opportunity for sustainable food production and natural drainage, and as a habitat for biodiversity. Harrow's Biodiversity Action Plan recognises the importance of allotments and gardens in the continued survival of species and habitats, and identifies among other threats the loss of these spaces to development. Amendments to PPS 3 excludes back gardens and allotments from the definition of 'previously developed land' and the London Plan makes provision for LDFs to introduce a presumption against development on back gardens. Harrow's housing trajectory identifies sufficient previously-developed sites to meet the Borough's housing target and policies within this strategy allow for other sites to be brought forward in strategically preferable locations. Development of designated open space (including allotments) and back gardens is therefore strategically unnecessary and will be resisted.

.21 Harrow's Transport Study (2010) identifies potential future capacity problems at the at Queensbury Circle roundabout and at the Whitchurch Lane/Honeypot Lane junctions. Opportunities will be sought through the Borough Investment Plan and development to secure the proper functioning of these junctions in the long term.

.22 Household car ownership across the Kingsbury and Queensbury sub area is moderate to high. The high level of car ownership across the Borough means that encouraging car owners to change their mode of transport to a more sustainable form such as public transport or, particularly for shorter trips cycling and walking, is a significant challenge. The London Plan sets out maximum parking standards and these will be applied, alongside the spatial co-ordination of development with public transport accessibility and services set out in this strategy, to encourage a more sustainable lifestyle.

.23 The Community Infrastructure Levy Regulations enable local planning authorities to collect from individual developments financial contributions towards infrastructure made necessary by development across the Borough. Infrastructure requirements have been assessed and identified in the Council's Infrastructure Delivery Plan incorporating relevant provisions from the Borough Investment Plan for housing and the Local Implementation Plan for Transport, as well as specific requirements arising from the Biodiversity Action Plan, the management strategies for specific conservation areas, and the documented needs of other community service providers such as the Harrow NHS. The Council will publish a CIL charging schedule following the adoption of this Core Strategy. In accordance with the Regulations, where a specific requirement arises from a particular site or development proposal, this should be provided-for by a Planning Obligation.

Statement 3

Delivery

The Development Management Policies DPD will ensure the continued protection of Metropolitan Open Land, Green Belt and other open space. Policies will also set out criteria for the assessment of proposals relating to biodiversity and nature conservation, listed buildings, historic parks and gardens, economic development, the management of employment land, town centre uses and town centre vitality and viability, the design and layout of development, and the protection to be afforded to back gardens. These policies will also consider the designation of town centres and shopping frontages, alongside criteria for mixed use development in designated centres.

Development Management Policies will be amplified where appropriate by supplementary planning documents. These will include the Harrow Residential Design Guide and Sustainable Building Design SPD.

The Site Allocation DPD will identify previously-developed sites for housing and may also highlight the potential for renewal through mixed use development of offices.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to deliver the projects and other actions set out in Harrow's Biodiversity Action Plan and Green Grid. A replacement Cultural Strategy and Open Spaces Strategy will be prepared and this will include opportunities to work with partner organisations in connection with the delivery of sport, recreation, leisure and open spaces.

The Council will review the Borough Investment Plan and continue to work with the Homes and Communities Agency [now GLA?] to support affordable housing schemes and estate renewal in Rayner's Lane.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to achieve co-ordinated improvements within the public realm.

LOCAL Implementation Plan 2..

Housing Trajectory Sites

Site	Site Area	Indicative Number of Units	Indicative Phasing
No sites	No sites	No sites	No sites

Housing Trajectory

Evidence Studies

.24 Kingsbury District Centre - mainly within LB Brent (severed section north of Kenton rd only in Harrow)

.25 Queensbury local centre

Retail Study

.26 Kingsbury District Centre (only):

- medium-sized centre, functioning as a convenience and service (A2/A3/A5) centre; below national average vacancy
- small number of comparison and convenience national retailers
- off street parking and (in Harrow section) free on-street parking in service road
- heavy traffic along Kenton Road/Kingsbury Road
- 'adequate' environmental quality
- no changes to retail frontage recommended
- development opportunities identified: land at junction Kenton Road/Honeypot Lane - 1,000 sq. m

Employment Land Study

.27 Honeypot Lane/Dalston Gardens - 3.0 Hectares - score 14/30. Mix of warehousing, distribution and storage units, office and retail uses. Good access. Surrounded by residential. Poor quality site. Allocated industrial and business site.

.28 Honeypot Business Centre, Parr Road = 5.8 hectares - score 18. Warehousing, distribution and storage units and light industrial offices. Large residential development to north of site. Most of site at risk of flooding. Allocated industrial and business use site.

Transport Study

.29 Highway junctions with potential future capacity problems:

- Honeypot Lane/Streatfield Road/Taunton Way/Charlton Road roundabout (Streatfield Road, Taunton Way and Honeypot Lane arms)
- Whitchurch Lane/honeypot Lane (all arms)

.30 Buses

- no capacity issues at 8.35% passenger growth (sensitivity testing shows no impact upon services through Kingsbury & Queensbury)

.31 Underground (taking into account planned capacity improvements)

- Jubilee line: no capacity problems

West London SHMA/Viability Study/Housing Capacity

PPG 17 Study

Strategic Flood Risk Assessment

.32 Part of Brent Catchment - Kenton Brook. Area of flood risk zone 2 and 3 through small residential area north of kingsbury and south of queensbury.

Character Study

Contextual Stuff

London Plan designations

Relationship with Harrow Sustainable Community Plan

Harrow Vitality Profiles

.33 One of the most densely populated areas of the Borough - typically over 72pph.

.34 This area has one of the highest percentage of households with children, especially Queensbury with over 40%.

.35 Higher crime area compared to rest of the borough, except intensification area.

Kenton & Belmont Circle

Draft Core Strategy (Pre-Submission) for O&S

Kenton & Belmont Circle

Introduction

.1 This sub area borders Brent to the South, with Kenton centre straddling the border. Kenton and Belmont are both local centres that provide a range of services to meet local residents needs. Kenton in particular has a wide variety of shops, and is also home to a large format Sainsburys supermarket which is located on the Brent side of Kenton Road. Kenton is highly accessible by public transport, and whilst originally a metroland parade, recent development and its' location on a major road which gives it a very urban feel. Belmont, is not as accessible by public transport having no underground station serving it, and retains metroland characteristics and a more suburban environment.

.2 Both centres are surrounded by suburban residential development, typically inter war estates, with small areas of post war infill. This gives the areas a leafy, low density feel, and is popular with families and larger households. The area is also fairly well served by open space, including Kenton Recreation Ground, and borders a large area of Metropolitan Open Land to the North which is part of Stanmore Golf Course. An area of flood risk affects residential areas just to the east of Kenton centre along the Wealdstone Brook, and as with many areas of the borough, parts of the waterways are culverted.

Box 4

Objectives

- To provide a mix of housing to meet the needs of the local population where opportunities arise.
- Support development in the local centres to ensure they remain viable shopping destinations for local residents
- Improved public realm in the local centres, and better connectivity between Kenton and Northolt Park tube stations.
- The protection of the areas leafy suburban character and distinctive metroland setting through retaining back gardens and restricting inappropriately designed buildings.
- Protect open spaces as integral parts of this areas character and history, to provide for both leisure and cultural opportunities, as well as improving biodiversity.
- Promote opportunities to connect up the areas open spaces and improve the areas water ways whilst reducing the flood risk to the east of Kenton centre.

Policy CS 9

Kenton & Belmont Circle

Within Kenton and Belmont local centres, redevelopment appropriate to the centre's predominantly convenience use function and Metroland character will be promoted. Provision for retail and A2, A3, A4 & A5 uses commensurate in scale and form to the function of the local centre will be required at ground floor level. New premises must be viable in terms of size, layout and servicing arrangements, and be accessible to all.

Public realm improvements will also be sought, especially along Kenton Road in Kenton local centre to improve pedestrian flows and enhance the environment. Improved access to Kenton via public transport will be sought by supporting proposals to clearly link and improve the connection between Kenton Station and Northolt Park Station in neighbouring Brent.

New premises must be viable in terms of size, layout and servicing arrangements, and be accessible to all. The maximum contribution that non-retail commercial uses are to make of a particular centre will be set out in the Development Management Policies DPD.

Where suitable a net contribution to housing supply will also be sought as part of the mixed use conversion or redevelopment of sites within Kenton and Belmont centres to help ensure their vitality and viability.

Any redevelopment and infill opportunities elsewhere will be expected to reflect the scale, pattern and appearance of the site's surroundings. Development on back gardens will be resisted, reflecting their contribution to the character of residential areas and as an environmental resource.

There will be a presumption against any net loss of open space in this area. The open land in this area including Kenton Recreation Ground will be maintained and enhanced in line with PPG17 study recommendations. Inappropriate uses and development on open space will be resisted.

Opportunities to improve flood mitigation measures along the Wealdstone Brook will be promoted, and the flood storage role of open space will be maintained. Development will be expected to comply with the sequential approach in areas of flood risk.

Improvements to the Belmont Trail will be sought and promoted as part of the Borough's Green Grid strategy to help connect the areas green spaces with others, specifically in neighbouring Brent and north through the Borough..

All development will be required to contribute to the delivery of strategic infrastructure in accordance with the Borough's Community Infrastructure Levy charging schedule. Specifically, improvements to the following junction will be sought:

- Kenton Road/Kenton Lane: (all arms)

Provision for contributions or other requirements specific to the site or proposal will be expected to be made through a s.106 Planning Obligation. New development will be expected to contribute towards improvements in the environment of both centres; to enhancing access to and the quality of local parks and open spaces.

Justification

.3 Harrow's Retail Study (2009) projects a modest increase of small convenience store floorspace over the period 2009-2026. In recognising the growth of service uses in recent years and the role that these can play in supporting overall town centre vitality and viability, the Study also recommends provision be made for A2, A3, A4 and A5 uses over the same period. As local centres Kenton and Belmont have a modest role within the town centre hierarchy, providing mainly convenience shops and other services for the immediate locality. The redevelopment of sites within these centres will be required to re-provide viable premises for retail and A2-A5 uses at ground floor. Any net increase in retail floorspace and A2-A5 floorspace will be considered in relation to the status of Kenton and Belmont as local centres and any potential impact upon other centres within the Borough.

.4 Kenton and Belmont span across parts of two of the 2010 PPG 17 Study sub areas⁰. The Study identifies a shortfalls, based upon recommended standards per 1,000 population, of 67.13 hectares in the central sub area and 34.19 hectares in the south-east sub area in 2010. These shortfalls are projected to rise to 67.20 hectares and 39.51 hectares respectively in 2026. The comparable shortfall for the Borough as a whole stands at 117.38 hectares and is projected to rise to 133.76 hectares by 2026. For this reason, and in recognition of the wider sustainability role that open space plays within the urban environment⁰, all open space will be safeguarded and opportunities to increase it will be sought.

.5 There are no indoor sport facilities within the Kenton and Belmont sub area; however Harrow Leisure Centre is located at the interface of the area with the Harrow and Wealdstone Intensification Area. Some outdoor sport pitches within the sub area are located within public open space and valuable additional provision is made by community access to school and sports club sites. Investment to increase pitch provision and multi-use games areas should focus on the Kenton area to help address the outdoor sport shortfall in the central PPG 17 study area and to address a significant gap in games area accessibility.

.6 Opportunities to create small and pocket parks will focus on areas of deficiency within the Belmont area. Throughout Kenton and Belmont, investment will be directed to qualitative improvements which promote the function of existing open spaces to district park status, or through Green Grid projects which enhance accessibility to district parks.

.7 New development will be expected to provided for children's play and amenity greenspace. Across all types of play space there are significant gaps in accessibility and investment should be prioritised towards new provision that would address these.

Kenton West ward in the central sub area; and Belmont ward in the south-east sub area notably for biodiversity, natural drainage and flood storage, mitigation of air, light and noise pollution, and for general human health and wellbeing

- .8** Throughout Kenton and Belmont there is a pressing need to provide for natural and semi-natural greenspace. Green Grid projects which enhance the biodiversity and accessibility value of the Belmont Trail will be prioritised, and opportunities to enhance the value of Vernon Drive amenity greenspace and Priestmead Recreation Ground should be considered.
- .9** Allotments will continue to meet the needs of local residents in Kenton and Belmont, and of the Borough as a whole; investment should focus on qualitative improvements. Any site no longer required for allotment gardening over the plan period will be safeguarded to to address the shortfall in accessible natural and semi-natural greenspace.
- .10** Detailed requirements for open space provision and contributions, informed by the 2010 Study, will be set out in development management policies, site allocations and a Community Infrastructure Levy as appropriate.
- .11** Harrow's Housing Trajectory demonstrates no identified capacity for new housing developments over the period 2009-2026. Additional housing capacity will therefore only be sought from unforeseen opportunities on previously developed sites within the local centres and other brownfield sites. The West London Strategic Housing Market Assessment demonstrates a requirement for [??] affordable homes across the sub-region and for [??] within the London Borough of Harrow. [something here about the conclusions of the viability assessment]. To ensure that all sites above the London Plan threshold of ten or more dwellings contributes to the delivery of the Borough's minimum requirement, or helps to exceed it, the maximum viable number of dwellings up to 50% of all the dwellings proposed on the site will be sought as affordable homes. [something here about the tenure and size mix][anything to add here that shows the level of need within the sub area/any specific requirements??]
- .12** Harrow's suburban areas are an important part of the Borough's character and heritage, with many areas displaying strong coherence in design, proportions and pattern of development. The Character Assessment of Harrow's Residential Areas (2010) identifies within the residential suburbs of the Kenton and Belmont sub area estates of traditional inter-war housing, post-war infill development, and areas of more mixed character such. When development opportunities arise in suburban areas, substantial weight will be given to the wider setting of the site in determining the appropriate density, scale and form of development. These considerations will also apply to proposals for domestic development. A residential design guide has been published, as a supplementary planning document, which amplifies the appropriate considerations and detailed requirements.
- .13** All open space has an intrinsic value and will therefore be protected in quantitative terms. Where opportunities for enhancement of public access to the Open Land arise, these will be pursued as part of the Borough's Green Grid to help connect open spaces via the Belmont trail as part of a north - south connection through the borough..
- .14** As with other forms of open space, gardens and allotments have a multiplicity of social and environmental benefits, including their positive impact on health and wellbeing, the opportunity for sustainable food production and natural drainage, and as a habitat for biodiversity. Harrow's Biodiversity Action Plan recognises the importance of allotments and gardens in the continued survival of species and habitats, and identifies among other threats the loss of these spaces to development. Amendments to PPS 3 excludes back gardens and allotments from the definition of 'previously developed land' and the London Plan makes provision for LDFs to introduce a presumption against development on back gardens. Harrow's housing trajectory identifies sufficient previously-developed sites to meet the Borough's housing target and policies within this strategy

allow for other sites to be brought forward in strategically preferable locations. Development of designated open space (including allotments) and back gardens is therefore strategically unnecessary and will be resisted.

.15 The Borough's Strategic Flood Risk Assessment (2009) identifies parts of Kenton and Belmont sub areas as being at risk of flooding from the Wealdstone Brook. Development will be managed in accordance with the sequential and (where appropriate) exception tests set out in Planning Policy Statement 25: *Development and Flood Risk* (2006) to help manage risk from and increase resilience to flooding. An overall reduction in flood risk will be achieved through the use of sustainable urban drainage systems to achieve greenfield run-off rates in accordance with policy recommendations set out in the Assessment, to be brought forward through the Development Management Policies DPD. The Level 2 Strategic Flood Risk Assessment (2011) will be used in the preparation of the Site Allocations DPD to direct development appropriately in relation to the flood risk vulnerability of uses and the land's probability of flooding. Open space will be utilised as a natural flood storage resource.

.16 The Community Infrastructure Levy Regulations enable local planning authorities to collect from individual developments financial contributions towards infrastructure made necessary by development across the Borough. Infrastructure requirements have been assessed and identified in the Council's Infrastructure Delivery Plan incorporating relevant provisions from the Borough Investment Plan for housing and the Local Implementation Plan for Transport, as well as specific requirements arising from the Biodiversity Action Plan, the management strategies for specific conservation areas, and the documented needs of other community service providers such as the Harrow NHS. The Council will publish a CIL charging schedule following the adoption of this Core Strategy. In accordance with the Regulations, where a specific requirement arises from a particular site or development proposal, this should be provided-for by a Planning Obligation.

Statement 4

Delivery

Statement 5

The Development Management Policies DPD will ensure the continued protection of Metropolitan Open Land, Green Belt and other open space. Policies will also set out criteria for the assessment of proposals relating to biodiversity and nature conservation, listed buildings, historic parks and gardens, economic development, the management of employment land, town centre uses and town centre vitality and viability, the design and layout of development, and the protection to be afforded to back gardens. These policies will also consider the designation of town centres and shopping frontages, alongside criteria for mixed use development in designated centres.

Development Management Policies will be amplified where appropriate by supplementary planning documents. These will include the Harrow Residential Design Guide and Sustainable Building Design SPD.

The Site Allocation DPD will identify previously-developed sites for housing and may also highlight the potential for renewal through mixed use development of offices.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to deliver the projects and other actions set out in Harrow's Biodiversity Action Plan and Green Grid. A replacement Cultural Strategy and Open Spaces Strategy will be prepared and this will include opportunities to work with partner organisations in connection with the delivery of sport, recreation, leisure and open spaces.

The Council will review the Borough Investment Plan and continue to work with the Homes and Communities Agency [now GLA?] to support affordable housing schemes and estate renewal in Rayner's Lane.

The Council will employ its own staff and other available resources, and work with partners as appropriate, to achieve co-ordinated improvements within the public realm.

Housing Trajectory Sites

Site	Site Area	Indicative Number of Units	Indicative Phasing
No sites	No sites	No sites	No sites

Housing Trajectory

Evidence Studies

.17 Kenton local centre; straddles boundary with LB Brent

Retail Study

.18 Kenton local centre (only):

- medium-sized centre, functioning as a convenience centre predominantly independent/ethnic offer and lower order comparison; below national average vacancy
- no national retailers (except Sainsbury's in LB Brent) and only one high-street bank
- off street parking provided as part of Sainsbury's food store
- heavy traffic along Kenton Road but wide pavements
- variable environmental quality due to traffic (noise/pollution)
- no changes to retail frontage recommended
- no development opportunities identified

Employment Land Study

Transport Study

.19 Highway junctions with potential future capacity problems:

- Kenton Road/Kenton Lane: (all arms)

.20 Buses

- no capacity issues at 8.35% passenger growth (sensitivity testing shows impact upon one service through Kenton)

.21 Underground (taking into account planned capacity improvements)

- Bakerloo line: no capacity issues

.22 Trains

- London overground: no capacity issues

West London SHMA/Viability Study/Housing Capacity

PPG 17 Study

Strategic Flood Risk Assessment

.23 Part of Brent catchment - no rivers or flood risk.

Character Study

Contextual Stuff

London Plan designations

Relationship with Harrow Sustainable Community Plan

.24 Relevant short-term actions (delete as appropriate to sub area policy)

- increase provision of affordable housing

- Increase sustainability/air quality by reducing car use as mode of travel to school
- Improve street and environmental cleanliness
- Increase domestic waste recycling and composting
- Undertake tree replacement programme (relate to green grid actions?)
- Deliver decent homes standard to Council owned homes
- Implement biodiversity action plan (relevant actions?)
- Regenerate rayners lane and mill farm
- Improve the safety of journeys between home and school
- Reduce the number of empty homes and households in temporary accommodation
- Develop more extra care housing
- Increase migrants' english language schools and knowledge (d1 uses in offices?)

.25 Relevant ambitions (delete as appropriate to sub area policy)

- Employment land is maintained and enhanced to provide local residents with the opportunity to work within the Borough
- Business occupancy is maintained and new businesses are attracted to Harrow
- Major new businesses are committed to training and skills through planning conditions
- Tourism to continue to support the local economy and create local employment
- Schools rebuilt/remodelled (ambition relates to now defunct BSF)
- New developments are aligned with transport routes
- Transport routes are aligned with high density development
- Residents have a choice of good quality and affordable housing in a variety of tenures, in particular improve the availability of larger family housing
- Increase the use of sustainable energy
- Work closely with TfL to improve the access and reliability of public transport
- There is easy and convenient access to footpaths, cycle paths and public transport to promote the use of more sustainable modes of transport for local journeys
- New developments are of a high quality design and are appropriate in terms of their scale, size and location
- High density development includes provision for mixed use activities on site
- Harrow's existing heritage buildings and sites are preserved and enhanced
- There is a balance and variety of well managed and accessible green spaces, and the Green Belt and biodiversity is protected and improved
- The growth of waste is reduced through improved awareness of waste issues and the importance of waste reduction
- Waste will be diverted from landfill by focusing on increasing the amount of waste we recycle and compost
- There is continued investment to improve social housing and public infrastructure (roads, public spaces and street lighting)
- There will be a range of learning, leisure and cultural opportunities
- There will continue to be a range of arts and sports facilities that are accessible to everyone
- The accommodation needs of Gypsies and Travellers will be met to enable them to raise their families in a safe and healthy environment
- Harrow will continue to be one of the safest boroughs in London
- Services are more personalised and neighbourhood focused

Harrow Vitality Profiles

.26 Area of lowest business activity - with just 1% of all Harrow's businesses.

Building Design

Draft Core Strategy (Pre-Submission) for O&S

Building Design

Objectives

- seek to curtail increases in transport-based CO2 emissions by promoting commercial and residential development in locations that reduce the need to travel by car and promote more sustainable modes of transport;
- Provide homes that can cater for people throughout their lives without major modifications and are fit for purpose.
- maximising the sustainability of new buildings that minimise energy demands through building design & site layout and maximise opportunities to meet the energy needs of the development by on-site renewable sources or as part of a district wide community heat and power scheme;
- reducing per person water demand from new development through installation of efficient water-consuming goods and rainwater capture & re-use;
- encouraging improvements to the energy efficiency of existing buildings through adaptation
- seek to minimise the urban heat island effect and maximise the opportunities for natural drainage by retention and extension of a green grid of open spaces and the protection of gardens from development;
- promoting the use of green roofs and requiring sustainable urban drainage techniques to minimise the effect of surface water run-off on localised flooding; and
- sustainable management of flood risk by directing development away from areas of greatest flood risk, except where there are clear sustainability and regeneration benefits, and the utilisation of opportunities for deculverting & flood water holding areas.

Policy 1

All new homes will be expected to comply with the Mayor of London's Housing Design Guide and Harrow's Residential Design Guide SPD which incorporates Building for Life guidance. The development density to be achieved on any particular site will need to have regard to the existing or proposed public transport accessibility level of the site.

All development and alterations to the built environment should contribute to the creation of secure and safe environments that reduce the scope for crime and anti-social behaviour, having regard to Secured By Design standards. Major development proposals, particularly those with the potential to create crowded places, should also have regard to guidance on resilience to terrorism, published by the National Counter Terrorism Security Office.

All development proposals should therefore respond positively to the local context of buildings in terms of design, siting, density and spacing, reinforce the attractive qualities of local distinctiveness and enhance areas of poor design; extensions should respect their host building

development to successfully integrate with the landscape and surrounds, and not result in the loss of back gardens, or have a potentially adverse impact on protected trees;

Within the Harrow & Wealdstone Intensification Area and other district and local centres with good public transport provision, development will achieve a mix of uses, density and layout which encourages walking & cycling and promotes travel by public transport.

Throughout the Borough, new development and retrofitted buildings will be expected to contribute to the energy hierarchy:

- Be lean: use less energy;
- Be clean: supply energy efficiently
- Be green: use renewable energy

More efficient use of energy and water will be achieved through compliance with the Code for Sustainable Homes and BREEAM standards as set out in the Mayor's London Plan, and through design and layout which is responsive to site circumstances. Major development will need to achieve, as a minimum, the carbon dioxide reduction targets set out in the London Plan.

Decentralised energy supply systems will be sought wherever appropriate. Within the Harrow and Wealdstone Intensification Area a district-wide combined heat and power network will be promoted; all major development within the Intensification Area will be expected to contribute to the expansion of and connect to the network. Elsewhere, where feasible, major developments will be expected to provide on-site decentralised energy facilities including Combined Heat and Power plants, with infrastructure put in place to form new networks, or to link to emerging new networks as appropriate.

Development will be expected to fully exploit opportunities to implement renewable energy systems and to maximise the contribution of renewables to meeting the site's energy demands. Adaptation of existing buildings to reduce their carbon dioxide emissions will be encouraged where opportunities arise through change of use and extensions. Harrow's Sustainable Building Design SPD will be used to determine the appropriate adaptations and level of intervention.

All new development will seek to achieve green field surface water run off rates through the use of sustainable urban drainage systems. Development located within Wealdstone's area of higher flood risk will be managed to minimise risk to life and property: essential infrastructure and highly vulnerable uses will not be provided within the area of higher flood risk; more vulnerable uses will not be provided within the area of higher flood risk except for dwellings above ground floor level and with a secure, dry means of escape to land not at high flood risk. Less vulnerable uses only will be permitted at ground floor level within the area of higher flood risk. Revisit - EA not happy with this - need PPS25 sequential and exception test adding instead?

Elsewhere, outside the Harrow & Wealdstone Intensification Area, development will be directed sequentially to areas of lower flood risk in accordance with PPS 25. Where development is, exceptionally, permitted in areas of higher flood risk, provision of or contribution to flood mitigation infrastructure may be required. Where appropriate, opportunities will be sought to reinstate natural water courses and drainage channels.

The design of all major development will be expected to contribute to the Borough's resilience to climate change including, where appropriate, the provision of green roofs, sustainable drainage techniques and rainwater recycling. The provision of space and landscaping on site, or opportunities to contribute to tree planting and the enhancement of the open spaces network, will be sought as a counter to the urban heat island effect, particularly within the Harrow & Wealdstone Intensification Area.

Justification

- .1 The Mayor has produced a Housing Design Guide which consolidates existing requirements and lays down new standards for affordable housing. Recognising that the quality of new housing has been an increasing concern in recent years and for consistency with affordable housing, the Council will seek to achieve the Mayor's quality standards in all new development.
- .2 The Harrow & Wealdstone Intensification Area provides a real opportunity to achieve a more sustainable community. Consistent with national policy and the London Plan, there is potential within the Area to achieve higher residential densities than elsewhere in the Borough with access to shops, services and employment across distances that are feasible by foot and bicycle, or otherwise with almost immediate access to public transport services serving destinations within and outside the Borough. As an area with greatest potential for physical change, new buildings will individually and collectively contribute to the Council's carbon reduction aspirations and as well as achieving other benefits, such as improvements to surface water drainage, reductions in per person levels of potable water consumption and green roof provision.
- .3 The energy hierarchy is established in the London Plan. The first priority is to deliver development that is highly efficient in its use of energy. Compliance with the Code for Sustainable Homes or, for non-residential development, the BREEAM standards as set out in the London Plan will achieve high levels of energy efficiency. In urban situations the efficient supply of energy can be achieved through decentralised heat and power systems; these are particularly effective where there is a mix of uses with complementary heat and power demands which can be networked. In this respect the Harrow and Wealdstone Intensification Area again presents significant opportunity,

though such systems and networks can also be employed on individual sites or as part of smaller networks elsewhere. Finally, the use of renewable energy will help to meet the energy needs of a site and should be employed to complement the other components within the hierarchy.

.4 Harrow's Sustainable Building Design SPD (2009) provides further details on the techniques that can be employed to achieve more sustainable forms of development and buildings with a better environmental performance. The Council recognises that although new development will achieve (at least) current standards of efficiency and sustainability, Harrow's substantial stock of pre-war dwellings will not be replaced for the foreseeable future and that encouragement will need to be given to householders to make adaptations that help to reduce carbon dioxide emissions from this source. The SPD therefore also includes a checklist of sustainability improvements that can be made by householders as part of extensions to or general refurbishment of domestic properties.

.5 Harrow's Climate Change Strategy (2009) contains further details of programmes that are currently available to encourage the improvement of the existing housing stock.

.6 National planning policy establishes a sequential approach to the management of development and flood risk, by aiming to steer development away from areas of higher flood risk towards land in areas of low flood risk. In doing so, it recognises that not all uses are equally vulnerable to flood risk and that in some circumstances, which may include a clear need for regeneration, some development in areas of risk may be desirable and necessary.

.7 A 'first stage' Strategic Flood Risk Assessment (2009) for Harrow has been produced. It recommends that flood risk in Harrow should be managed through the implementation of sustainable urban drainage systems. Such systems include green roofs, surface flood storage areas, the use of permeable surfaces, bioretention areas and engineering solutions such as tanks for storing and managing the release of storm water. Redeveloped sites should use a variety of sustainable drainage systems to achieve a greenfield discharge rate, that is, the site's natural rate of surface water run off prior to any development. Again the Harrow & Wealdstone Intensification Area offers significant potential to achieve a widespread reduction in surface water run off compared with existing rates from this largely hard-surfaced part of the Borough; within Wealdstone specific improvements will be needed to help manage the risk of flooding from the culverted Wealdstone Brook.

.8 Other policies which encourage the preservation and enhancement of green infrastructure, tree protection and new planting as detailed as an action in the Sustainable Community Plan, will contribute to a greater resilience to climate change. For example open areas provide a counter to the urban heat island effect as well as providing natural drainage. Trees provide summer shade to buildings and open spaces and also aid drainage.

Sustainable Community Plan

.9 Relevant short-term actions (delete as appropriate to sub area policy)

- increase provision of affordable housing
- Increase sustainability/air quality by reducing car use as mode of travel to school
- Improve street and environmental cleanliness
- Increase domestic waste recycling and composting
- Undertake tree replacement programme (relate to green grid actions?)
- Deliver decent homes standard to Council owned homes

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- Implement biodiversity action plan (relevant actions?)
- Regenerate rayners lane and mill farm
- Improve the safety of journeys between home and school
- Reduce the number of empty homes and households in temporary accommodation
- Develop more extra care housing
- Increase migrants' english language schools and knowledge (d1 uses in offices?)

.10 Relevant ambitions (delete as appropriate to sub area policy)

- Employment land is maintained and enhanced to provide local residents with the opportunity to work within the Borough
- Business occupancy is maintained and new businesses are attracted to Harrow
- Major new businesses are committed to training and skills through planning conditions
- Tourism to continue to support the local economy and create local employment
- Schools rebuilt/remodelled (ambition relates to now defunct BSF)
- New developments are aligned with transport routes
- Transport routes are aligned with high density development
- Residents have a choice of good quality and affordable housing in a variety of tenures, in particular improve the availability of larger family housing
- Increase the use of sustainable energy
- Work closely with TfL to improve the access and reliability of public transport
- There is easy and convenient access to footpaths, cycle paths and public transport to promote the use of more sustainable modes of transport for local journeys
- New developments are of a high quality design and are appropriate in terms of their scale, size and location
- High density development includes provision for mixed use activities on site
- Harrow's existing heritage buildings and sites are preserved and enhanced
- There is a balance and variety of well managed and accessible green spaces, and the Green Belt and biodiversity is protected and improved
- The growth of waste is reduced through improved awareness of waste issues and the importance of waste reduction
- Waste will be diverted from landfill by focusing on increasing the amount of waste we recycle and compost
- There is continued investment to improve social housing and public infrastructure (roads, public spaces and street lighting)
- There will be a range of learning, leisure and cultural opportunities
- There will continue to be a range of arts and sports facilities that are accessible to everyone
- The accommodation needs of Gypsies and Travellers will be met to enable them to raise their families in a safe and healthy environment
- Harrow will continue to be one of the safest boroughs in London
- Services are more personalised and neighbourhood focused

Waste Management

Draft Core Strategy (Pre-Submission) for O&S

Waste Management

Objectives

- provide the infrastructure and networks which make the Borough and London work for people, businesses and visitors;

Policy 2

The Council supports the objectives of sustainable waste management and will:

- aim to reduce the amount of waste produced in the Borough;
- promote waste as a resource and encourage increased re-use of materials and recycling;
- require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy;
- safeguard all existing waste management sites unless appropriate compensatory provision is made;
- seek to maximise the use of existing waste management sites through intensification or co-location of facilities; and
- in conjunction with its partners in West London, identify and allocate suitable new sites for waste management facilities within the Joint Waste Plan to provide sufficient capacity to meet the apportionment requirements of the London Plan.

Justification

.1 The amount of combined municipal, commercial and industrial waste requiring management in Harrow is projected to increase to 208,905 tonnes in 2010, to 239,602 tonnes in 2015 and 281,511 tonnes in 2020. The London Plan requires that communities and boroughs take more responsibility for managing their own waste and to achieve a level of at least 85% self sufficiency by 2020.

.2 In response to the need to address the future management of waste arisings, the West London Waste Plan (WLWP) is being prepared jointly by the six west London borough's of Harrow, Brent, Ealing, Hillingdon, Hounslow and Richmond upon Thames. The WLWP is being prepared in accordance with the national planning policy in PPS10, and will take account of the London Plan waste apportionment figures and targets for self-sufficiency and recycling.

Sustainable Community Plan

- .3** Relevant short-term actions (delete as appropriate to sub area policy)
- increase provision of affordable housing
 - Increase sustainability/air quality by reducing car use as mode of travel to school
 - Improve street and environmental cleanliness
 - Increase domestic waste recycling and composting
 - Undertake tree replacement programme (relate to green grid actions?)

- Deliver decent homes standard to Council owned homes
 - Implement biodiversity action plan (relevant actions?)
 - Regenerate rayners lane and mill farm
 - Improve the safety of journeys between home and school
 - Reduce the number of empty homes and households in temporary accommodation
 - Develop more extra care housing
 - Increase migrants' english language schools and knowledge (d1 uses in offices?)
- .4 Relevant ambitions (delete as appropriate to sub area policy)
- Employment land is maintained and enhanced to provide local residents with the opportunity to work within the Borough
 - Business occupancy is maintained and new businesses are attracted to Harrow
 - Major new businesses are committed to training and skills through planning conditions
 - Tourism to continue to support the local economy and create local employment
 - Schools rebuilt/remodelled (ambition relates to now defunct BSF)
 - New developments are aligned with transport routes
 - Transport routes are aligned with high density development
 - Residents have a choice of good quality and affordable housing in a variety of tenures, in particular improve the availability of larger family housing
 - Increase the use of sustainable energy
 - Work closely with TfL to improve the access and reliability of public transport
 - There is easy and convenient access to footpaths, cycle paths and public transport to promote the use of more sustainable modes of transport for local journeys
 - New developments are of a high quality design and are appropriate in terms of their scale, size and location
 - High density development includes provision for mixed use activities on site
 - Harrow's existing heritage buildings and sites are preserved and enhanced
 - There is a balance and variety of well managed and accessible green spaces, and the Green Belt and biodiversity is protected and improved
 - The growth of waste is reduced through improved awareness of waste issues and the importance of waste reduction
 - Waste will be diverted from landfill by focusing on increasing the amount of waste we recycle and compost
 - There is continued investment to improve social housing and public infrastructure (roads, public spaces and street lighting)
 - There will be a range of learning, leisure and cultural opportunities
 - There will continue to be a range of arts and sports facilities that are accessible to everyone
 - The accommodation needs of Gypsies and Travellers will be met to enable them to raise their families in a safe and healthy environment
 - Harrow will continue to be one of the safest boroughs in London
 - Services are more personalised and neighbourhood focused

Gypsies & Travellers

Draft Core Strategy (Pre-Submission) for O&S

Gypsies & Travellers

Objectives

- Work with stakeholders and the community to meet the needs of Gypsies and Travellers
- ensuring that growth in housing, employment opportunity, cultural and leisure facilities and services reflects Harrow's increasingly ethnically diverse population

Policy 3

Provision will be made within the Harrow Site Allocations DPD for additional pitches to meet the limited need identified for Gypsy and Traveller accommodation within the Borough having regard to:

- The need for suitable and safe access to and from the site for the types of vehicles that could reasonably be expected to use or access the site;
- The ability to provide the site with essential services, such as water, sewerage and drainage and waste disposal;
- The impact on the local environment, including any relevant pre-existing policy designations for or adjacent to the site that would necessarily restrict its use for any type of housing (e.g. Metropolitan Open Land, Site of Nature Conservation Importance etc), and the character of the area including visual and amenity considerations;
- The need to avoid areas subject to risk from flooding; and
- The proximity to shops, services and community facilities, such as schools.

Justification

.1 The accommodation needs of Gypsies and Travellers will be met to enable them to raise their families in a safe and healthy environment as set out in the actions of Harrow's Sustainable Community Plan. This is best achieved through the allocation of suitable sites through the Site Allocations DPD, having regard to the criteria above to ensure any development is safe, accessible, fits in with local character and is close to local facilities.

Where to Make Representations on the Core Strategy **Appendix 1**

Draft Core Strategy (Pre-Submission) for O&S

Appendix 1 Where to Make Representations on the Core Strategy

Have Your Say

1.1 The Council is pleased to invite residents, businesses, community groups and other stakeholders to comment on this final stage of the Core Strategy - the Pre-Submission version, and give your opinion as to whether the document is sound.

1.2 This stage of consultation is different to previous stages, in that comments are only invited as to the soundness of the document, not views on options for growth as in previous consultations. This is because this Pre-Submission document has built upon the consultation responses to the previous three formal consultations, and is now at a stage where these views have been taken into account, alongside Harrow's completed Evidence Base, to produce a final Core Strategy.

1.3 All responses will be submitted, alongside the Core Strategy and any suggested revisions that will give effect to these responses, to the Secretary of State / Planning Inspectorate for Independent Examination in Public for a determination of whether the document is justified and sound. If this is found to be the case, the Core Strategy will then be recommended for adoption. Changes as a result of responses received may be requested by the Planning Inspector or requested by the Council, but in general, if found sound, this document will be the Core Strategy that is adopted.

1.4 Outlined below are ways to make representations on the Core Strategy.

Using Harrow's online consultation system

The consultation document can be viewed and commented-upon online (<http://harrow-consult.limehouse.co.uk>).

At any time you can access the online help system by typing 'help' in the search box (below the title 'Consultation Portal') or by using the following web address:

<http://harrow-consult.limehouse.co.uk/common/help.jsp>

An index of topics upon which help is available is given on the left side of the help page.

How to register on the Council's consultation portal (to make your comments on line)

You do not need to register to simply view a consultation document, but you will need to register to make comments online. To register:

1. Click on the blue 'Login/Register' link at the top right corner of the screen.
2. A "login" prompt will appear. Click on the "Register" option.
3. A choice of two options will appear *Consultee* or *Agent*; click the option appropriate to you.
4. A list of boxes to fill-in will appear (inviting you to provide name, e-mail, username and password details); complete these boxes, indicate that you agree with the terms & conditions of use and then click 'OK'.

5. An e-mail will then be sent to the e-mail address given inviting you to activate the account. This can be done by clicking on the first web address link in the text of the e-mail and then by providing the username & password on the consultation portal (then click 'OK').
6. You will then be invited to fill in some additional details about your postal address and other contact details. When you have done this, click 'OK'.

You will now be logged-in to the Council's consultation home page. You can view the consultation document and any others by clicking on the relevant links at the bottom of the page.

How to make online comments on a consultation document

To make online comments on a consultation document you need to have first registered (see above) and, when logged in, have selected the consultation document you wish to look at. To make comments:

1. Either click on the '*Read document*' button at the top of the screen or use the blue document structure tree on the left side of the screen to read and navigate your way through the document.
2. Throughout the document there are questions. Click on '*Add comments*' (above each question) to give your response to the question.

How to view a consultation document (without registering) on the Council's consultation portal

You can view the consultation documents online, but to make online comments you will first need to have registered (see above). To view a consultation document:

1. Go to the website: <http://harrow-consult.limehouse.co.uk>
2. Click on the consultation document you wish to view at the bottom of the website page.
3. Click on the '*Read and comment on document*' box at the top of the page.

How to download a consultation document and questionnaire (without registering) on the Council's consultation portal

If you prefer to read an offline version of the of the consultation document you can download it and if necessary, print all or part of it off at home. To download and print a consultation document:

1. Go to the website: <http://harrow-consult.limehouse.co.uk>
2. Click on the consultation (Core Strategy Pre-Submission) document listed on the website page.
3. Click on the 'Supporting Documents' tab.
4. Click on the relevant document that wish to download and follow on screen prompts.

You can also download and print a copy of the consultation questionnaire. To do this, follow the steps above, selecting at step 4 the 'pdf' version of the questionnaire document. Once you have printed the questionnaire you may then fill it in by hand and post it to:

LDF Consultation

Harrow Council

Draft Core Strategy (Pre-Submission) for O&S

Civic Centre

PO Box 21

Harrow

HA1 2UJ

Using the Council's LDF Pages

Alternatively you can also visit www.harrow.gov.uk/ldf and download the Core Strategy and associated questionnaire from the Core Strategy page. Responses can be e-mailed to:

ldfconsultation@harrow.gov.uk

Guidance on Making Representations

Appendix 2

Draft Core Strategy (Pre-Submission) for O&S

Appendix 2 Guidance on Making Representations

1. Introduction

1.1 The development plan document (DPD) is published in order for representations to be made prior to submission. The representations will be considered alongside the published DPD when submitted, which will be examined by a Planning Inspector. The Planning and Compulsory Purchase Act 2004 (as amended) ⁰

⁰ (the 2004 Act) states that the purpose of the examination is to consider whether the DPD complies with the legal requirements and is 'sound'.

2. Legal Compliance

2.1 The Inspector will first check that the DPD meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness.

You should consider the following before making a representation on legal compliance:

- The DPD in question should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the Local Development Documents it proposes to produce over a 3 year period. It will set out the key stages in the production of any DPDs which the LPA propose to bring forward for independent examination. If the DPD is not in the current LDS it should not have been published for representations. The LDS should be on the LPA's website and available at their main offices.
- The process of community involvement for the DPD in question should be in general accordance with the LPA's Statement of Community Involvement (where one exists). The Statement of Community Involvement (SCI) is a document which sets out a LPA's strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs) and the consideration of planning applications.
- The DPD should comply with the Town and County Planning (Local Development) (England Regulations) 2004 (as amended) ⁰
- On publication, the LPA must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The LPA must also place local advertisements and notify the DPD bodies (as set out in the regulations) and any persons who have requested to be notified.

View the 2004 Act at: http://www.opsi.gov.uk/acts/acts2004/ukpga_20040005_en_1

View the amending 2008 Act at:

http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga_20080029_en.pdf

View the 2009 amending Regulations at:

http://www.opsi.gov.uk/si/si2009/pdf/uksi_20090401_en.pdf.

- The LPA is required to provide a Sustainability Appraisal Report when they publish a DPD. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The DPD should have regard to national policy and conform generally to the Regional Spatial Strategy (RSS). The RSS sets out the region's policies in relation to the development and use of land and forms part of the development plan for LPAs. In London it is called the Spatial Development Strategy.
- The DPD must have regard to any Sustainable Community Strategy (SCS) for its area (i.e. county and district). The SCS is usually prepared by the Local Strategic Partnership which is representative of a range of interests in the LPA's area. The SCS is subject to consultation but not to an independent examination.

3. Soundness

3.1 Soundness is explained fully in Planning Policy Statement 12: Local Spatial Planning in paragraphs 4.36 – 4.47, 4.51 and 5.52 and the boxed text⁰. The Inspector has to be satisfied that the DPD is justified, effective and consistent with national policy. To be sound a DPD should be:

• Justified

This means that the DPD should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

• Effective

This means the DPD should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities

The DPD should also be flexible and able to be monitored.

Draft Core Strategy (Pre-Submission) for O&S

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation.

Any measures which the LPA has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the DPD needs amendment.

• **Consistent with national policy**

The DPD should be consistent with national policy. Where there is a departure, LPAs must provide clear and convincing reasoning to justify their approach. Conversely, you may feel the LPA should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.

3.2 If you think the content of a DPD is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy or in the Regional Spatial Strategy (or the Spatial Development Strategy in London)? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the DPD on which you are seeking to make representations or in any other DPD in the LPA's Local Development Framework (LDF). There is no need for repetition between documents in the LDF.
- If the policy is not covered elsewhere, in what way is the DPD unsound without the policy?
- If the DPD is unsound without the policy, what should the policy say?

4. General advice

4.1 If you wish to make a representation seeking a change to a DPD or part of a DPD you should make clear in what way the DPD or part of the DPD is not sound having regard to the legal compliance check and three tests set out above. You should try to support your representation by evidence showing why the DPD should be changed. It will be helpful if you also say precisely how you think the DPD should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

4.2 Where there are groups who share a common view on how they wish to see a DPD changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

4.3 Further detailed guidance on the preparation, publication and examination of DPDs is provided in PPS12 and in The CLG Plan Making Manual⁰.

Housing Trajectory Appendix 3

Draft Core Strategy (Pre-Submission) for O&S

Appendix 3 Housing Trajectory

Schedule of Superseded, Deleted and Saved UDP Policies **Appendix 4**

Draft Core Strategy (Pre-Submission) for O&S

Appendix 4 Schedule of Superseded, Deleted and Saved UDP Policies

Glossary Appendix 5

Draft Core Strategy (Pre-Submission) for O&S

Appendix 5 Glossary

Affordable Housing[Broken link - possible circular reference](#) Housing which is subsidised and available to people whose incomes mean that they are unable to otherwise meet their housing needs locally via the open housing market. Such housing is classified as either Social Rented Housing or Intermediate Housing which meet the criteria as set out in the London Plan. Affordable Housing would include homes that are rented, under shared ownership and key worker housing.

Annual Monitoring Report [Broken link - possible circular reference](#) (AMR) The Annual Monitoring Report assesses the progress and the effectiveness of the council's LDF against indicators set by the Government and the Local Authority. In particular AMRs assess the LDF based on the effectiveness of the policies in achieving targets, intended consequences and whether sustainable development is being delivered as well as whether the assumptions and objectives behind the policies are still relevant.

Area Action Plan (AAP) A type of development plan document focused upon a specific location or an area subject to conservation or significant change (for example, major regeneration).

Biodiversity[Broken link - possible circular reference](#) The range and variety of life (including plants, animals and micro-organisms) as well as habitats, ecosystems and ecological processes.

Biodiversity Action Plan (BAP) The Harrow Biodiversity Action Plan was adopted in 2008 and identifies habitats and species of importance to the Borough's biodiversity, as well as a programme of costed projects for the protection and/or enhancement of these habitats and species.

Building Research Establishment Environmental Assessment Method (BREEAM) The BRE Environmental Assessment Method is a widely used environmental assessment method for buildings.

Brownfield Land[Broken link - possible circular reference](#) Previously developed land, often referred to as brownfield land, is defined at Annex B of the Government's Planning Policy Statement 3: *Housing* (2006): 'Previously-developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure'. The definition expressly excludes amongst other things: land occupied by agricultural or forestry buildings; and land in built-up areas such as parks, recreation grounds and allotments which, although may feature paths, pavilions and other buildings, has not previously been developed. There is no presumption that land that is previously developed is necessarily suitable for housing development nor that the whole of the curtilage should be developed.

Business Improvement District (BID)[Broken link - possible circular reference](#) A Business Improvement District is a precisely defined geographical area within which the businesses have voted to invest collectively in local improvements to enhance their trading environment. BIDs do not affect the level or quality of service provided by the local authority to the area. A BID is initiated, financed and led by the commercial sector, providing additional or improved services as identified and requested by local businesses, to the baseline services provided by the local authority in that area.

Carbon Dioxide (CO₂) Carbon dioxide is a chemical compound produced naturally by plants and animals, and emitted by the burning of fossil fuels. CO₂ is a 'greenhouse gas', meaning that it is one of the gases which has been found to trap heat within the Earth's atmosphere and a major contributor to climate change.

Climate Change[Broken link - possible circular reference](#) Climate change is any long-term significant change in the “average weather” that a given region experiences. Average weather may include average temperature, precipitation and wind patterns. Mainstream scientific consensus suggests a link between human activity and recent climate change.

Code for Sustainable Homes This code is a Government accreditation system for measuring the sustainability of new housing development. Like the BREEAM standard it measures the environmental performance of new homes, but it also gives credit for 'health and wellbeing' measures such as daylight, sound insulation and lifetime homes, and for 'good management' such as considerate contractor measures and site security.

Combined Heat and Power (CHP) CHP is the simultaneous generation of usable heat and power (usually electricity) in a single process that can be used within the local area.

Community Cohesion Management Group (CCMG) This is a management sub group of the Harrow Strategic Partnership (HSP).

Comparison Goods This term is used to describe the retailing of goods such as clothing, household goods, furniture, DIY, electricals etc. for which consumers usually 'shop around'.

Conservation Area[Broken link - possible circular reference](#) An area of special architectural or historic interest, the character of which is desirable to preserve or enhance. There is a total of 28 Conservation Areas in Harrow of varying size and character. Conservation Areas are usually designated by the Council although the Secretary of State can also designate them.

Convenience Goods This term is used to describe the retailing of goods purchased on a regular basis, typically food, groceries, cleaning products etc.

Core Output Indicator (COI) This is a set of indicators included within the AMR devised and employed at national and regional level to develop consistency between datasets on issues of strategic importance such as housing, employment and the environment.

Core Strategy The Core Strategy is the main development plan document (DPD) within a local development framework (LDF). Every local planning authority must produce a core strategy, which must provide: an overall vision of how the area and the places within it should develop; strategic objectives for the area focusing on the key issues to be addressed; a delivery strategy for achieving these objectives; and clear arrangements for managing and monitoring the delivery of the strategy.

Creative Industries[Broken link - possible circular reference](#) Industries including advertising, architecture, art and antiques markets, arts and crafts, design, film and video, music and performing arts, publishing, software and television and radio among others.

Cultural Heritage[Broken link - possible circular reference](#) Buildings and other structures considered to be of a special architectural or historic quality or interest. This includes, but may not be limited to, Listed Buildings and Conservation Areas.

Deculverting A culvert is a conduit used to enclose a flowing body of water. During the development boom of the 1920/30s many of Harrow's brooks and streams were culverted. Deculverting is the process of re-opening culverted waterways.

Demographic Projections These are projections of population change given as total figures but are also provided broken-down by age, sex and ethnicity. In London demographic projections are provided by the GLA's Data Management and Analysis Group. The 'round' refers to period in which the projections were made, so the '2007 Round' refers to the projections prepared in 2007.

Density (dwellings)[Broken link - possible circular reference](#) Measure used to describe the numbers of housing units within a given area, usually expressed in terms of the number of habitable rooms per hectare. The site area would include the total area within the defined site including roads within the site and also private garden space, car parking space, incidental open space and landscaping, and children's play areas where these are provided.

Destination Parks A classification for parks in Harrow which serve the needs of residents over a wider area than just those who live in the immediate vicinity of the park. These are: Harrow Weald Common; Canons Park; Byron Recreation Ground; Pinner Memorial Park; Stanmore Country Park; Harrow Recreation Ground; West Harrow Recreation Ground; and Headstone Manor Recreation Ground.

Development Plan Documents (DPDs)[Broken link - possible circular reference](#) Documents that help to make up the Local Development Framework including the Core Strategy, Proposals Map, Site Specific Allocations, Area Action Plans.

Dwelling A home.

District Centre[Broken link - possible circular reference](#) Centres which provide a retail function for local communities together with a range of other services including financial services, restaurants and cafes. These centres also fulfil an important function as a focus for the local community they serve as well as a public transport node.

Economy[Broken link - possible circular reference](#) The system of human activities related to the production, distribution, exchange, and consumption of goods and services. Harrow's economy is part of the wider London, United Kingdom and world economy.

Environment[Broken link - possible circular reference](#) Includes the 'natural' environment (air water, land, plants and animals and all associated cycle and ecosystems) and the 'built' environment (buildings and other structures built by humans).

Equivalised Household Income A measure of income which is adjusted to take account of household size.

Greenspace Information for Greater London (GIGL) is the biodiversity records resource for London.

Greater London Assembly The assembly is the body of elected members which scrutinises the activities of the Mayor of London and is a part of the governance of the Greater London Authority.

Greater London Authority (GLA) The regional tier of Government covering London. It is led by the Mayor of London and he is held to account by the London Assembly.

Government Office for London (GOL) The body which represents central Government in London. The Office administers the role of the Secretary of State for the purposes of the Planning Acts.

Green Belt[Broken link - possible circular reference](#) An area subject to special control under a national designation. The purpose of Green Belts is to protect the countryside from further development. There is a general presumption against development in the Green Belt.

Green Belt Management Strategy This is the management strategy, produced by the Council, for the management of Harrow's Green Belt.

Green Grid An interconnected, integrated network of green, open spaces.

Harrow Strategic Partnership (HSP) The Partnership brings together a group of people who represent the statutory, private, business, community and voluntary sectors in Harrow. Community views and partners' data are used by the Partnership to shape and influence the Borough's priorities in the Sustainable Community Strategy.

Hectare[Broken link - possible circular reference](#) A hectare is a unit of measuring area, comprising 10,000m²

Housing Needs Assessment This was an assessment carried out by Fordham Research on behalf of Harrow Council to provide an overview of the housing situation in the Borough and to calculate an estimate of affordable housing requirements as well as housing demand across all tenures and property sizes.

Hub and Spoke The hub and spoke model is a commonly used term to describe a larger, central node linked to smaller, satellite points. In service provision, this would mean a high level or central service unit supported by smaller, localised service units.

Intermediate Housing[Broken link - possible circular reference](#) Defined by the London Plan as sub-market housing which is above target rents, but is substantially below open market levels. This category can include shared ownership and other sub-market rent provision as well as key worker housing.

Intensification Area Harrow town centre, Wealdstone and the Station Road corridor have been identified in the consultation draft replacement London Plan (October 2009) as a proposed 'Intensification Area' to accommodate at least 1,500 new homes and with an indicative employment capacity of 2,000 jobs.

Key Stakeholders[Broken link - possible circular reference](#) A person or organisation with a legitimate interest in various aspects of the planning process in Harrow.

Lifetime Homes A Lifetime Home is a dwelling that conforms to standards (the Lifetime Homes Standards) which make it accessible to disabled people and flexible enough to be adapted for the needs of occupiers throughout a life cycle.

Listed Building[Broken link - possible circular reference](#) A building that is of national, architectural or historic importance. The Secretary of State (Department of Media, Culture and Sport) is responsible for the Statutory List of Buildings of Architectural or Historic Interest. Any building they deem to be of national historic and architectural value can be added to this list, and therefore becomes a listed building.

Local Area Agreement (LAA) Local Area Agreements are a performance management tool to help local authorities agree common priorities with the community and central Government. Harrow's LAA was approved on 1st June 2008 and will run until 31st March 2011.

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Local Centre[Broken link - possible circular reference](#) Centres which provides shopping and services for the local community and have a limited catchment area.

Local Development Documents (LDD)[Broken link - possible circular reference](#) Individual planning documents comprising of Development Plan Documents and Supplementary Planning Documents.

Local Development Framework (LDF)[Broken link - possible circular reference](#) The portfolio of planning documents that makes up the Development Plan for a Local Authority.

Local Development Scheme (LDS) The Council's time-scaled programme for the preparation of Local Development Documents that must be agreed with the Greater London Authority and reviewed every year.

Local Implementation Plan (LIP) This is a statutory document which sets out how the Council together with its partners will deliver integrated transport improvements over the period 2005/06 and 2010/11.

Local Indicator This is a set of indicators included within the AMR devised and employed locally on issues of local importance such as housing, employment and the environment.

Local Parks A classification for parks in Harrow which primarily serve the needs of local residents. See also 'Destination Parks' above.

London Plan[Broken link - possible circular reference](#) The London Plan provides a vision and strategic guidance on planning matters for the whole of London. The document is prepared by the Mayor of London.

Metropolitan Centre[Broken link - possible circular reference](#) Defined in the London Plan as a regionally important centre serving a wide catchment area covering several boroughs and offer a high level and range of shopping including multiple retailers and department stores. A Metropolitan Centre would also have a broad and varied range of other services including financial services, restaurants and cafes. They also have significant employment, service and leisure functions and have well established and high frequency transport links.

Mixed Use Development[Broken link - possible circular reference](#) A development that contains two or more uses e.g. residential, employment, leisure, and community uses

Node (or hub)[Broken link - possible circular reference](#) A place where activity and routes are concentrated

Not in Employment, Education or Training (NEET) This is a Government classification for persons between the ages of 16 and 24 who are not in employment, education or training.

Office of the Deputy Prime Minister (ODPM)[Broken link - possible circular reference](#) The Government department that was responsible for planning until May 2006. Communities and Local Government is the department now responsible for determining national planning policies as well as the rules that govern the operation of the planning system.

Planning Obligations (sometimes known as Section 106 Agreements) These are legal obligations through which developers undertake to fulfil planning requirements that cannot otherwise be dealt with as a condition of planning permission. Typically they include the transfer of homes

to Registered Social Landlords (RSLs) to be provided as affordable housing, and the payment of financial contributions towards the provision of infrastructure such as schools and public transport. The Council has prepared a Planning Obligations Supplementary Planning Document (SPD) which sets out the requirements for Planning Obligations in Harrow.

Place Shaping This is a term used in Planning Policy Statement 12 *Local Spatial Planning* (2008) to describe the process of creating unique, distinctive places. The PPS points out that, today, local authorities' place shaping functions are more likely to be fulfilled in partnership with the public, private and voluntary sectors with direct input from local communities.

Planning Policy Guidance (PPG) [Broken link - possible circular reference](#) Planning Policy Guidance notes issued by central Government to set out a national policy position in relation to a particular aspect of planning practice or development. PPG's referred to in this document include PPG 2 *Green Belts* (1995) and PPG 17 *Planning for Open Space, Sports and Recreation* (2002).

Planning Policy Statements (PPS) [Broken link - possible circular reference](#) Statements of national planning policies set out by Communities and Local Government which are gradually replacing Planning Policy Guidance (PPG). PPS's referred to in this document include draft PPS 4 *Planing for Sustainable Economic Development* (2009) and PPS 25 *Development and Flood Risk* (2006)

Post HUDP Indicator This is a s/et of indicators included within the AMR devised following the adoption of the Harrow Unitary Development Plan (HUDP) 2004 to measure its effectiveness

Preferred Option This is the current version of Harrow's emerging Core Strategy which sets out the Council's preferred approach, following on from previous preferred options, to the future development and infrastructure planning of the Borough.

Primary Care Trust (PCT) This body is now known as NHS Harrow and is the commissioning organisation which purchases health care services on behalf of Harrow residents.

Proposals Map [Broken link - possible circular reference](#) A map that forms an integral part of the LDF and which identifies sites/areas to which particular policies apply.

Public Transport Accessibility Level (PTAL) [Broken link - possible circular reference](#) The extent and ease of access, by public transport, from one place to another. Usually given a rating from 1 to 6, the PTAL is calculated taking into account the distance from any given point to the nearest public transport stops and the frequency of the service from those stops. On the scale, 6 is close to public transport and 1 is further away.

Registered Social Landlords (RSLs) These are Housing Associations, supported by the Homes and Communities Agency to provide affordable housing.

Regulation 25 This refers to the relevant regulation of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended by the Town and Country Planning (Local Development) (Amendment) (England) Regulations 2008, which requires public consultation on development plan documents in their preparation/development stage.

Residents' Panel The residents' panel is a forum of more than 1,200 Harrow residents who have signed up to give the Council or its partners views on a variety of topics. The Panel is representative of the Borough's over-18 populationa nd employment status.

Section 106 Contributions See 'Planning Obligations'

Sites of Importance for Nature Conservation (SINC) These are sites of biodiversity significance, identified and kept under review by Greenspace Information for Greater London (GIGL). Sites are classified in the following order of importance: Sites of Metropolitan Importance; Sites of Borough Importance (Grade I); Sites of Borough Importance (Grade II); and Sites of Local Importance.

Sites of Special Scientific Interest (SSSI) An area that Natural England designates for its special nature conservation interest, which can include land or water containing plants, animals, geological features or land forms of special interest and which therefore must be protected. Sites are protected under the provisions of the Wildlife and Countryside Act 1981 (as amended),

Social Rented Housing[Broken link - possible circular reference](#) Defined by the London Plan as housing provided to rent by the Local Authority or Registered Social Landlords. Rents are substantially below open market levels and are no higher than target rents set by the government for housing association and local authority rents at a level that are genuinely affordable by local people whose incomes mean that they are unable to otherwise meet their housing needs.

Spatial Development Strategy[Broken link - possible circular reference](#) Provides a vision and strategic guidance on planning matters for the whole of London. The document is prepared by the Mayor of London and is generally referred to as the “London Plan”.

Statement of Community Involvement (SCI)[Broken link - possible circular reference](#) A statement prepared by the Local Authority for consultation on the LDF as a whole (as well as on planning applications). This explains how information is to be made available, who is to be consulted and how and when consultation is to take place.

Strategic Housing Land Availability Assessment (SHLAA) The requirement for SHLAAs is set out in Planning Policy Statement 3 *Housing* (2006); their role is to identify sites with housing potential, including potential capacity, and to assess when they are likely to be developed. In London the SHLAA has been carried out at regional level, by the Mayor of London, with input from each borough. The Mayor of London's 2009 SHLAA and Housing Capacity Study was published October 2009.

Supplementary Planning Document (SPDs)[Broken link - possible circular reference](#) SPDs expand upon or add detail to policies within Development Plan Documents. They do not introduce new policies and must be consistent with local, regional and national policies. They can take the form of design guides or area development briefs.

Supplementary Planning Guidance (SPGs)[Broken link - possible circular reference](#) SPGs expand upon or add detail to policies within the London Plan. Similar to SPDs, SPGs do not introduce new policies and must be consistent with regional and national policies. They too can take the form of design guides or area development briefs.

Sustainability Appraisal (SA)[Broken link - possible circular reference](#) An assessment prepared by the Local Authority that considers the social, environmental and economic effects of a plan or policy and incorporates the requirements of the SEA Directive (European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”).

Sustainable Community Strategy[Broken link - possible circular reference](#) The Sustainable Community Strategy shows how the organisations making up the Harrow Strategic Partnership will try to shape the effects of global, national, regional and local trends and events to work towards successful outcomes for Harrow.

Sustainable Development/Design[Broken link - possible circular reference](#) Development that meets the needs of the present generations without compromising the ability of future generations to meet their own needs. Sustainable design refers to building techniques and associated measures that can help to achieve sustainable development.

Sustainable Development & Enterprise Group (SD&E) This is a management sub group of the Harrow Strategic Partnership (HSP).

Tenure[Broken link - possible circular reference](#) Describes the type of ownership of a property eg. privately rented, socially rented, freehold etc.

Town Centre[Broken link - possible circular reference](#) Places within the borough with shopping, services and leisure functions. In Harrow there is one Metropolitan Centre as well as District and Local Centres.

Transport for London (TfL) Transport for London is the body which provides and regulates public transport services within Greater London under the strategic supervision of the Mayor for London.

Unitary Development Plan (UDP)[Broken link - possible circular reference](#) The UDP is a land use plan which is to be superseded by the LDF. It provides the statutory planning framework for the local planning authority setting out the objectives, policies and proposals for the use of land and buildings in the borough.

Use Classes Order (UCO) The UCO is shorthand for the Town and Country Planning (Use Classes) Order 1987, as amended. The purpose of the order is to classify different types of land use to enable uses to allow controls to be effectively applied and to enable certain changes of use to take place without the need for planning permission. 'A' uses are those appropriate to town centres comprising A1 (Retail), A2 (Financial and Professional Services), A3 (Cafés and Restaurants), A4 Drinking Establishments, A5 (Hot Food Take-aways). 'B' uses are those that apply to employment comprising B1 (Business), B2 (General Industrial) and B8 (Storage or Distribution). 'C' uses are residential in character: C1 (Hotels), C2 (Residential Institutions) and C3 (Dwellings). 'D' uses comprise D1 (Non-Residential Institutions) and D2 (Assembly & Leisure).

Vulnerable Uses These are the vulnerable uses referred to at Annex D of Planning Policy Statement 25 Development and Flood Risk (2006) which classifies uses according to their vulnerability to flood risk.

Waste Management Strategy (2009) The Council's strategy for managing the Borough's waste.

West London Sub-Region[Broken link - possible circular reference](#) One of the sub-regions established by the London Plan. The West London Sub-Region comprises the seven boroughs of Hammersmith and Fulham, Brent, Ealing, Harrow, Hillingdon, Hounslow and Kensington and Chelsea. It has a population of 1.6 million and provides over 900,000 jobs.

Wheelchair Homes A Wheelchair Home is a dwelling that conforms to standards (the Wheelchair Homes Standards) which make it suitable for independent occupation by a wheelchair user.

**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE
AND SCRUTINY SUB-
COMMITTEES**

Date of Meeting:	27 th January 2011
Subject:	Single Equalities Scheme
Responsible Officer:	Paul Najsarek – Corporate Director: Adults and Housing Tom Whiting – Assistant Chief Executive
Scrutiny Lead Member area:	All
Exempt:	No
Enclosures:	Single Equalities Scheme Equality Impact Assessment

Section 1 – Summary and Recommendations

This report sets out the final draft Single Equalities Scheme which covers the Council's approach to taking forward the protected characteristics (Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation) under the Equality Act 2010 and working towards the excellent level of the new Equality Framework for Local Government (EFLG) with a view of achieving the excellent accreditation by March 2012.

Cabinet has recommended the scheme to Council for approval.

Recommendations:

That Overview and Scrutiny members provide feedback and comment on the SES.

Section 2 – Report

Introductory paragraph

Harrow is a borough with a very diverse population, particularly in terms of ethnicity and religion and belief, and this generates a range of needs and expectations all of which the Council needs to understand in order to provide appropriate services. As resources become scarcer, it is even more important to understand the community, their needs and aspirations and to be able to get services right first time and at the minimum cost. The Scheme provides a framework for helping to appreciate the characteristics of our community and, at the same time, addressing the various statutory Public Equality Duties.

The Council developed and published its first Single Equalities Scheme (SES) in 2007, and it is now due to be reviewed and updated. At the same time, the new Equalities Act 2010 introduces additional statutory requirements. The advent of the new duties and the need to review our existing Scheme has prompted this SES. In addition, the SES will also assist the Council to achieve the excellent level under the EFLG.

The Scheme provides a context within which the detailed requirements of the various duties will be addressed. It sets the framework for the Council's equalities approach that, together with the programme of equality impact assessments and other specific actions, will fulfil the Council's responsibilities as well as engendering a positive and holistic response to equalities issues.

Equality Framework for Local Government (EFLG)

The SES has been developed against the EFLG and will also assist the Council to achieve the highest (excellent) level of the framework.

The EFLG superseded the Equality Standard for Local Government (ESLG) and is a performance and improvement framework to enable local authorities to embed and mainstream equalities across the organisation. It builds on and develops the work councils have done on the old ESLG. It also:

- focuses more on outcomes and service improvements rather than processes;
- will enable authorities to take account of local needs and circumstances;
- integrates the public duties of race, disability and gender;
- highlights the role of local authorities and partners in challenging inequality in their communities;

Our progress

The Council is currently at level 4 of the old ESLG. Level 4 of the old standard translates to the 'Achieving' level of the new framework. The Council has now set itself a target of achieving the 'Excellent' level of the new framework by March 2012.

An internal assessment against the requirements of the 'Excellent' level was undertaken to establish our position as well as identifying gaps. This included a workshop with members of the Corporate Equalities Group (CEG) and evidence templates submitted by the key corporate areas reflecting the

performance areas under the Framework. . Each directorate was also asked to assess their areas against the excellent criteria to establish potential areas for improvement and identify actions to incorporate in SES Action Plan.

The findings from these assessments and the feedback and comments received from the consultation have informed the draft SES and the proposed cross cutting objectives of the Scheme, which are to:

- Develop a modern and diverse workforce to reflect the community we serve;
- Improve the data the council has on its residents and service users so all decisions can be taken and services developed in light of strong intelligence;
- Ensure that residents, service users and staff can influence decisions through effective communication and engagement;
- Deliver responsive services, improve customer care and increase customer satisfaction;
- Reduce inequalities through corporate commitment and partnership working;
- Promote diversity and community cohesion both within the council and the borough.

The SES has been based around the five performance areas of the EFLG to assist the Council to achieve the 'Excellent' level of the Framework.

Benefits of achieving excellence

Achieving 'excellence' will not only support the council's vision and embed equalities in the Better Deal for Residents Programme, but will also have many other benefits, which include:

- Ensuring we have an in depth knowledge and understanding of our communities and their specific needs so our services are tailored around the needs and requirements of our service users;
- Helping to demonstrate that unavoidable spending reductions have been determined as fairly as possible;
- Ensuring our services for both staff and service users are fair, equal and accessible;
- Contributing significantly to delivering efficient and improved services;
- Embedding Equality Impact Assessments in service development and the council's transformation programme, resulting in improved and accessible services;
- Working in partnership to tackle inequalities within the borough resulting in better life chances for all;
- Enhancing the council's reputation for being recognised as championing equality and diversity and promoting community cohesion;
- Contributing towards other performance frameworks;
- Increasing satisfaction levels of our staff, residents and service users;
- Increasing satisfaction for staff and members as being part of a reputable organisation championing equality and diversity;
- Fulfilling legal requirements.

The purpose of the EFLG is to mainstream and embed equalities in all our functions and services. This will also support our BDFR Programme to ensure we understand our communities and their needs; consult and engage with our service users and deliver responsive services and customer care more effectively and efficiently.

Financial Implications

The proposed actions contained within the SES form part of current or developing Directorate Service Plans which are the basis for budget preparation. The SES action plan has been developed through Service Improvement Plans and contributions from directorates. The financial costs will be contained within existing budgets.

Performance Issues

The principle measure of performance in equalities will be the level that the Council achieves against the new equalities framework for local government. There are three levels - emerging, achieving and excellent – and the Council is committed to seeking to achieve excellence by March 2012.

The action plan within the SES will contribute to achieving this target. To monitor performance and implementation of the SES, an annual progress report on the SES action plan will be submitted to the Corporate Equalities Group (CEG), CSB, the Overview and Scrutiny Committee and Cabinet.

Environmental Impact

There are no direct environmental impacts of this decision, but the extension of the duties to include socio-economic deprivation is relevant to work associated with affordable warmth and fuel poverty.

Risk Management Implications

There are no direct risk management implications of this decision.

Equalities implications

A full Equality Impact Assessment has been undertaken for the SES which has not highlighted any potential adverse impact but the SES and the action plans will not only meet the specific requirements of the Public Equality Duties but ensure our services are fair and equitable and improve our services.

Corporate Priorities

The SES will support our corporate priorities by improving support for vulnerable people and building stronger communities by demonstrating our services are fair, equitable and accessible and where possible enhance and adapt our services to cater for people with special needs such as a disability.

Section 3 - Contact Details and Background Papers

Contact: Mohammed Ilyas, Policy Officer – Equalities and Diversity 0208 424 1322

Background Papers: None

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Harrow Council Single Equalities Scheme

Alternative formats



If you require this document in another format e.g. in large print, Braille, audio or in a language other than English, please contact the Equalities Officer on:

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Foreword

We are pleased to present our second Single Equality Scheme (SES) 2011-2013 for Harrow Council.

Harrow is one of the most ethnically and religiously diverse boroughs in London with people of many different backgrounds and life experiences living side by side. It is the richness of this diversity, and the positive impact that it has on the borough and our community, that we believe helps make Harrow such a great place to live, work and visit. We know that the borough's diversity is something to value and encourage and this SES highlights our commitment to maintaining and building on our strengths by ensuring equality and diversity is integral to everything we do.

In serving a diverse population, the Council aims to ensure there is equality of opportunity for its residents, service users, employees, elected members, stakeholders and partner organisations irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

As an employer, we are committed to employing a diverse workforce, to help us to understand and relate to the community we serve. Through our recruitment policies and practices, we will aim to improve on our record and explore further initiatives and opportunities to encourage applicants from all sections of the community to consider joining us.

As a service provider, we are committed to ensuring our services are open, fair and accessible by taking into consideration the needs and requirements of our diverse community and service users. We will continue to improve our services through a comprehensive Equality Impact Assessment (EqIA) process, engaging with and listening to our communities and

service users.

As a procurer of goods and services, we will continue to ensure our commissioning processes are fair and equitable and that service providers delivering a service on our behalf share our commitment to equality and diversity.

Equality is about describing a vision for the area that is built on recognising the needs of every local community, promoting inclusion and cohesion, fairness and justice. As a community leader, we will continue to work in partnership with the public, voluntary and private sectors to ensure we achieve this vision for our borough.

As well as meeting the Public Equality Duties, the purpose of this Scheme is to highlight our commitment to ensuring our services are fair, equal and accessible and to set out a clear strategic approach to mainstreaming equalities over the next three years.

The development of this Scheme has involved consultation and engagement with our employees, residents, service users, partners and stakeholders and sets out our understanding of the issues facing Harrow and our plans for tackling them. We describe how we aim to tackle all forms of discrimination and promote good relations in the community.

Strong leadership, together with commitment and support from our employees, communities and partners, is what will make this Scheme successful. Our overall ambition is to champion diversity and promote equality in everything we do.

Michael Lockwood – Chief Executive

Cllr Bill Stephenson – Leader of Council

Introduction

The scheme highlights our commitment to promoting equality of opportunity for all together with promoting the Council's draft vision of **"Working together: Our Harrow, our Community"**.

Our vision for equalities is about improving our services and customer satisfaction. In 2007 the Council agreed to produce a Comprehensive Equalities Scheme incorporating the requirements of the existing (Race, Disability and Gender) duties but also extending this to age, religion or belief and sexual orientation equality.

This is our second SES which builds on our progress so far and highlights our continued commitment to ensuring equality and diversity is at the heart of everything we do, from recruitment and selection, policy and service development to the delivery of services.

Although we have made good progress in mainstreaming equalities across the organisation, our ongoing challenge is to ensure that we convert our commitment through this SES into actions that deliver appropriate and responsive services and improve employment opportunities to all communities in our Borough.

The SES identifies six cross cutting objectives that we will be focusing on and deliver through a three-year action plan.

These are to:

- Develop a modern and diverse workforce to reflect the community we serve;
- Improve the data the council has on its residents and service users so all decisions can be taken and services developed in light of strong intelligence;

- Ensure that residents, service users and employees can influence decisions through effective communication and engagement;
- Deliver responsive services, improve customer care and increase customer satisfaction;
- Reduce inequalities through corporate commitment and partnership working; and
- Promote diversity and community cohesion both within the council and the borough.

These key objectives have been identified through in-depth consultation with our employees, residents, service users, elected members, stakeholders and partner organisations as well as being requirements under the Public Equalities Duties, equalities legislation and the requirements of the new Equality Framework for Local Government (EFLG).

To eliminate unlawful discrimination and promote equality, the government has introduced 'equality duties' for all public sector institutions. The first of these was the Race Equality Duty introduced in 2001, followed by the Disability Equality Duty in 2006, and the Gender Equality duty in April 2007. The more recent Equality Act 2010 (Appendix 1) which replaces the existing equalities legislation proposes to extend the duty to age, religion or belief, sexual orientation, transgender and social-economic inequality.

The SES is a living document and we will ensure this is regularly reviewed and updated.

Our Vision and Corporate Priorities

The Council and its Partners have agreed a Sustainable Community Strategy for Harrow that looks at the sort of place the borough should be by 2020. The Strategy covers a range of issues and sets out aspirations for each of them. Overall, its direction can be summed up as:

By 2020, Harrow will be recognised for:

- Integrated and co-ordinated quality services, many of which focus on preventing problems from arising, especially for vulnerable groups, and all of which put users in control, offering access and choice;
- Environmental and community sustainability, because we actively manage the Council's impact on the environment and have supported inclusive communities which provide the jobs, homes, education, healthcare, transport and other services all citizens need;
- Improved quality of life, by reducing inequalities, empowering the community voice and promoting respect and becoming the safest borough in London.

The Council is currently consulting on its draft vision (and priorities), which is "Working together: our Harrow, our Community".

The draft priorities being consulted on are:

1. Keeping neighbourhoods clean, green and safe;,
2. United and involved communities: a Council that listens and leads;
3. Supporting and protecting people who are most in need; and.
4. A Town Centre to be proud of: changing Harrow for the better.

Key to both the partnership and the council's delivery of this vision is to ensure that equalities and diversity are an integral part of everything that seeks to improve the quality of life in Harrow. This includes ensuring that this SES reflects both the borough's Sustainable Community Strategy and the council's Corporate Plan and supports the delivery of the priorities and outcomes identified within them.

Because the commitments set out in this SES cut across all the Sustainable Community Strategy's and council's objectives, the delivery of the council's equalities agenda will make a significant contribution to: 'Improving the quality of life, by reducing inequalities, empowering the community voice and promoting respect'.

The SES supports all three of the Council's objectives but makes a significant contribution to delivering the objectives to 'improve support for vulnerable people' and to 'build stronger communities'. Just as for the Sustainable Community Strategy, the SES will also impact across wider areas of the Council's work and priorities and will require the input of a number of our services and effective co-ordination between them.

Better Deal for Residents Programme

The current economic climate is affecting all sectors and residents alike. This, together with our drive for continuous improvement in services and customer satisfaction levels, has prompted our Better Deal for Residents (BDFR) programme where options are being advanced, in partnership wherever possible, to address the expected fall in the Council's resources over the next few years and the increasing expectations of residents.

The BDFR programme will, in the first instance, include a fundamental review of how public services in Harrow can deliver

more integrated services to local residents. It will focus on how services can be better aligned with residents' needs, whilst being more cost effective. The programme's specific objectives are to:

- **Deliver the Harrow Strategic Partnership vision** for Harrow as set out in the Sustainable Community Strategy
- **Deliver a balanced budget** in the medium term and make a significant contribution to 2010/11 budget
- **Enable continuous improvement** to continue and accelerate the service improvements we have made over recent years
- **Manage the increasing expectations of residents** – our customers expect comprehensive, value for money services with no increases in their council tax

The council's Better Deal for Residents (BDFR) Programme will inevitably have an impact on both service users and staff, so it is vital that we ensure equalities is at the heart of the programme and all projects within it.

To ensure the programme meets its objectives and outcomes, it is essential that equalities are at the heart of the programme. To identify the key themes and objectives, the needs and requirements of the communities of Harrow were considered, identifying inequalities in various areas.

An overarching EqIA was undertaken for the BDFR and an equalities strategy produced as a result of this. All projects within the BDFR programme will require a Test of Relevance (TOR) to be completed at the initial project brief (or at the Outline Business Case (OBC) stage) and a full EqIA when developing the business case for implementation (or at the Full Business Case (FBC) stage).

CREATE values

In September 2008, Cabinet agreed to

adopt new council values. These had been developed through workshops with employees, middle and senior managers and elected members. They also took on board what employees said was important through the employee survey.

The **CREATE** values are:

C	Customer first – we are focused on and have invested in improving the lives of our customers, going the extra mile to resolve their issues and empowering them to take responsibility for their own decisions.
R	Respect – so we treat each other with courtesy and regard, earning respect through working with others to engender trust.
E	Engaged Communication – that's why we listen. Actively placing a premium on engaging in conversations that bring people together allows curiosity and interest in areas other than their own.
A	Actively 'One Council' – we collaborate not blame, because we believe the 'sum of the parts' is more powerful than its individual parts.
T	Taking responsibility – we always deliver what we say we will, empowering and challenging each other to enhance performance and behaviour.
E	Energise and improve – while distinguishing ourselves by taking actions that innovate and improve.

Each of the CREATE values contributes to promoting equality of opportunity, eliminating discrimination and promoting good relations between people from different groups in some form. However, the 'Customer First' and 'Respect' values contribute to these quite significantly. The SES will also support and embed these values through its objectives and action plan.

Our Borough, our Community

Our borough

Harrow is an outer London Borough in North West London and approximately 10 miles from central London. Covering 50 square kilometres (20 square miles), Harrow is the 12th largest borough in Greater London. A fifth of the borough is green belt; there are nine district centres, plus Harrow Town Centre which is one of London's eleven metropolitan centres.

The borough is divided into 21 wards and each one is represented by three councilors.

Harrow has a population of 216,200 (ONS 2008 Mid-Year Estimates) and is one of the most diverse boroughs in the UK. The borough has one of the most ethnically diverse populations nationally with 53 per cent of Harrow's residents coming from a minority ethnic group (2007). Harrow now has the fifth highest proportion of residents from minority ethnic groups compared to its ranking in eighth place in 2001.

The borough's employment rate is 78 per cent of the working age population which is just below the national average of 79 per cent but above London's rate of just under 76 per cent (ONS Annual Population Survey 2008/09). The employment structure of Harrow is reasonably balanced, with similar proportions of the population working in distribution, hotels and restaurants (23%), finance, IT and other business activities (26%), and public administration, education and health (27%). This distribution is fairly typical of an Outer London Borough (ONS 2008 Annual Business Inquiry).

Indices of Multiple Deprivation 2007

The Index of Multiple Deprivation (IMD) 2007 combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area in

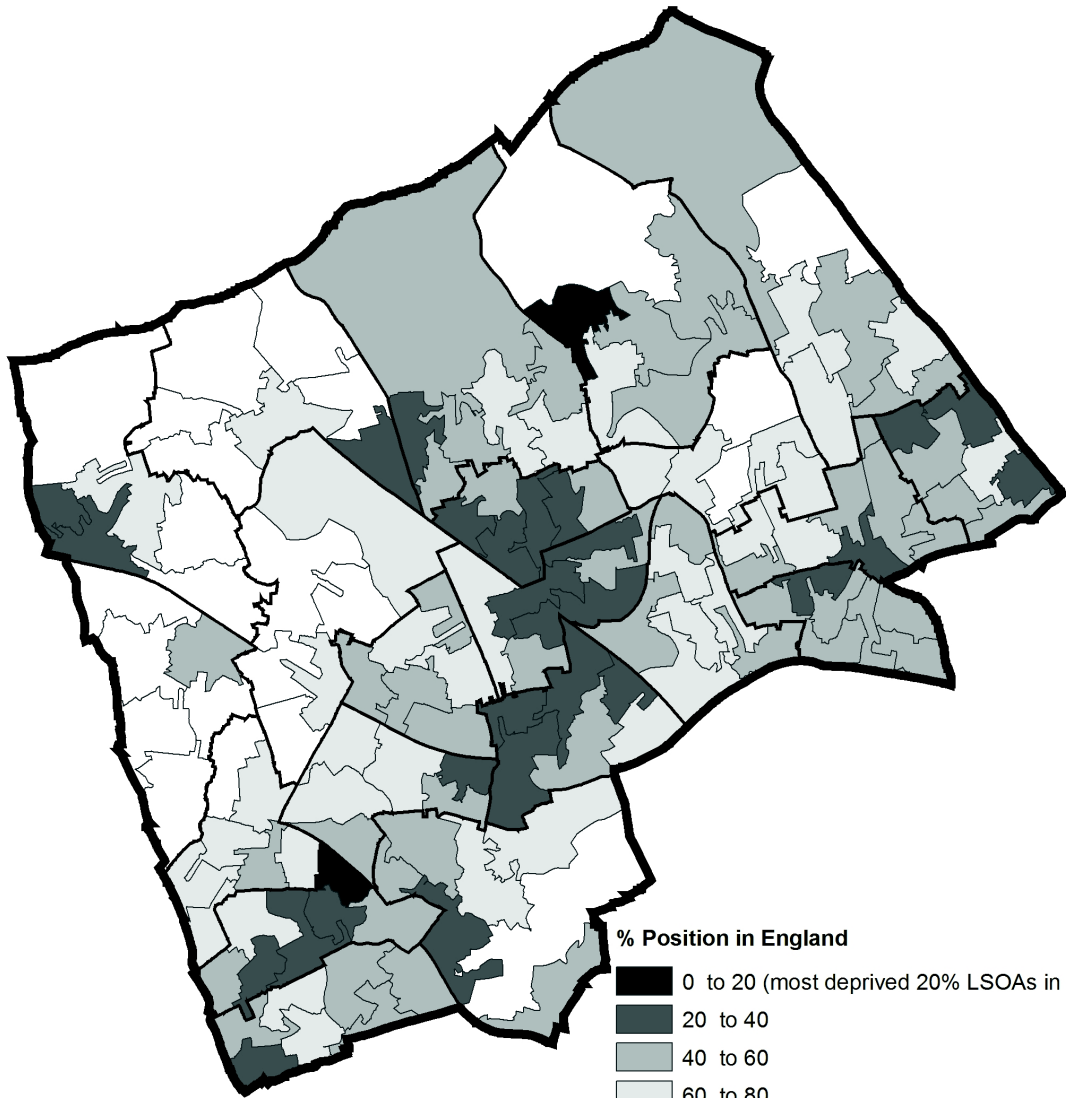
England called Lower Super Output Areas¹ (LSOAs). This allows each area to be ranked relative to one another according to their level of deprivation. The IMD can be broken down into seven separate indices which relate to income; employment; health and disability; education, skills and training; barriers to housing and services; living environment; and crime.

An in-depth analysis of the IMD can be found in Appendix 2 but the findings show that Harrow's relative deprivation in employment, income affecting children, health and disability, barriers to housing and services and living environmental has increased. That is to say, that on all of these factors, deprivation has increased. By contrast, the national ranking for income affecting older people, education and crime has improved since 2004. In relation to Education, skills and training, Harrow's score is 347 out of 354 meaning that we were one of the least educationally deprived places in the country.

Overall, Harrow has become more deprived in relation to other local authority areas since the previous published Indices of Deprivation in 2004. We are now ranked 196th out of 354 in the overall IMD compared to 232nd in 2004 where 1st is the most deprived. Similarly, within London, Harrow is ranked 25th, compared to 29th in 2004. Just two of Harrow's SOAs (in Roxbourne and Stanmore Park) are in England's 20% most deprived SOAs.

The borough map on the next page shows Harrow's wards and Lower Super Output Areas and which band of relative deprivation each falls into.

¹ Geographical units developed by the Office of National Statistics which have approximately the same number of households and population.



% Position in England

- 0 to 20 (most deprived 20% LSOAs in England)
- 20 to 40
- 40 to 60
- 60 to 80
- 80 to 100 (least deprived 20% LSOAs in England)

Our community

Harrow has one of the most ethnically and religiously diverse communities in the country.

Age

About a fifth (19%) of the population is over the age of sixty, which reflects a significant proportion of our population who could potentially have greater needs in terms of mobility and access to services. The table below gives a breakdown of the population in age groups.

Table 1: Breakdown of age groups

Age Group	Male	Female	All
1-14	20,500	19,200	39,700
15-29	23,100	20,800	43,900
30-44	25,100	24,700	49,800
45-64	25,000	27,000	52,000
65+	13,200	17,600	30,800

Disability

In total, 30,783 (10.05%) of the boroughs population declared having a limiting long-term illness/disability. This shows we have a significant proportion of our service users with some form of disability.

Over 7,600 people in Harrow were recipients of Disability Living Allowance (DLA) in February 2009, a rate of 3.5% of the total population. However, the rate remains below the London and England claimant rates for DLA which were 4% and 4.8% respectively. 12% of the recipients were children under the age of 16, 54% were of working age (16-59) and 34% were aged 60 and over.

Gender

Of Harrow's total population of 216,200, 106,900 (49%) are male and 109,300 (51%) are female.

Ethnicity

Harrow is one of the most diverse places in the country. The figures for Harrow show the total ethnic minority population (not white British) growing from 50.3 per cent in

mid-2001 to 53.4 per cent in 2007, the fifth highest proportion in England. Based on the Office for National Statistics (ONS) Mid Year Estimates for 2007 the percentage of working age (18-65) people from BAME groups in the local community is 48.35% and the BAME general population in Harrow is 54.89%.

Between the 2001 and 2011 census, Harrow's population is expected to have grown by 18,900 (a 4.2% increase). The growth will mainly be in the BME population. For example, the current BME school population is 78% BME. BME over 75's are expected to increase by 13% between 2006 and 2026

The table below shows the breakdown of residents in different ethnic groups.

Table 2: Breakdown of Harrow's population in ethnic groups 2007

Ethnic Group	Number	%
White: British	101,100	47.11
White: Irish	7,300	3.40
White: Other White	10,400	4.85
Mixed: White and Black Caribbean	1,600	0.75
Mixed: White and Black African	1000	0.47
Mixed: White and Asian	2,200	1.03
Mixed: Other	1,900	0.89
Asian or Asian British: Indian	47,900	22.32
Asian or Asian British: Pakistani	6,100	2.84
Asian or Asian British: Bangladeshi	1,500	0.70
Asian or Asian British: Other Asian	12,000	5.59
Black or Black British: Black Caribbean	6,600	3.08
Black or Black British: Black African	7,700	3.59
Black or Black British: Other Black	1,100	0.51
Chinese or Other Ethnic Group: Chinese	2,900	1.35
Chinese or Other Ethnic Group: Other	4,300	2

Religion or Belief

Based on the seven religions listed in the 2001 census, Harrow has the highest level of religious diversity of any local authority in England and Wales. This means that there is a 63 per cent chance that two people at random would be from different religious groups.

In 2001, 47% of Harrow's population were of a Christian faith compared to 58% in London as a whole and 72% nationally. 19.6% of Harrow's residents were of the Hindu faith, which is considerably higher than the London proportion which stood at 4.1% and England's at 1.1%. 7% of the borough's population were Muslim compared to London average of 8.5% and the national average of 3.1%. In 2001, Harrow had the third highest (6.3%) proportion of residents of the Jewish faith after Barnet and Hertsmere, higher than London at 2.1% and England at 0.5%. Nearly 7,800 (3.7%) of Harrows residents were followers of other religions in 2001.

Sexual Orientation

The 2001 census did not have a question on sexual orientation; however 222 persons declared living as same sex couples. It is estimated that 6% of the UK population are lesbian, gay and bisexual (LGB), which would equate to approximately 12,000 of our residents belonging to the LGB community.

Our Commitment to Equality and Diversity

Harrow Council aspires to be at the forefront of promoting equality of opportunity as an employer, service provider, procurer of goods and services and a community leader. We aim to tackle all forms of discrimination and achieve equality irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Achieving this is central to delivering the council's vision, which is linked to our Corporate Plan priorities and forms a driving force within the Sustainable Community Strategy; which is key to creating a cohesive community.

What is equality?

Equality is about making sure people are treated fairly and given fair chances. Equality is not about treating everyone in the same way, but recognising that their needs are met in different ways. Equality focuses on those areas covered by the law, namely the key areas of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

What is diversity?

Diversity is about valuing individual difference. Diversity is a given and not an option or something to decide to have or not to have. Where there are two or more people, there is diversity. Diversity is difference and we are all different from one another. Our differences include family background, age, gender, ethnic origin, physical abilities, appearance, nationality, sexual orientation, educational background and marital status. A diversity approach aims to recognise, value and manage differences in order to make society a better place for everyone.

Why are Equality and Diversity important?

As a Local Authority, it is important we recognise that our community and service users come from different backgrounds and work towards creating a culture and practices that recognise, respect, value and harness difference for the benefit of our organisation, service users and Borough. By understanding differences and encouraging others to do the same, we can make Harrow a better place for our service users and communities.

Our Equal Opportunities Policy

We recognise that in our society, groups and individuals continue to be unlawfully discriminated against and we acknowledge our responsibilities to eliminate unlawful discrimination and to promote equality of opportunity and good relations within the rich diversity of Harrow's communities. We first issued a policy statement on equal opportunities in 1980 and have since introduced numerous programmes to promote equality of opportunity for our employees and our services users.

Our Principles and Values

Our Equal Opportunities Policy is underpinned by a number of principles and values, which are to:

- Implement Harrow's equality policies to ensure that employment and service delivery policies address the needs of Harrow's diverse communities.
- Ensure services are responsive and truly accessible to customers;
- Plan, develop and maintain effective communication and information solutions in the way we work that will enable the Council, in partnership with the Trades Unions and workforce, to deliver cost effective and accessible services in the context of an appropriate work life balance;
- Ensure the workforce has the skills and competencies required to deliver a high

quality service through effective recruitment, selection and development of employees;

- Encourage partnership and participation in the development and application of the Council's services, policy and practices;
- Work actively to eliminate all forms of unlawful discrimination, both direct and indirect.

Meeting our statutory responsibilities through a Single Equality Scheme

Our equalities policy and this SES will ensure compliance with current UK equalities legislation highlighted throughout this document. We believe an overarching SES is a positive step forward in making clear our commitments to equality and diversity and identifying our priority outcomes, as well as meeting our statutory requirements under equalities legislation.

This Single Equality Scheme will:

- Provide an overarching framework ensuring a cohesive and integrated approach to equality and diversity across the council;
- Demonstrate the links between the borough's Sustainable Community Strategy, our Corporate Plan and other key strategies and plans;
- Set out our strategic aims and objectives for equality and diversity;
- Demonstrate our corporate commitment and identify roles and responsibilities;
- Promote good relations between people of different backgrounds, equality groups and the wider community in line with the council's commitment to effective community engagement and community cohesion;
- Seek to achieve a workforce that reflects our diverse population and promotes an inclusive working culture based on respect;
- Provide the framework to help us meet the requirements set out in the Equality

Framework for Local Government.

The SES will also set out arrangements for:

- Assessing and monitoring policies and functions for any adverse impact in relation to the diversity strands i.e. whether any of our policies and functions unintentionally disadvantage any parts of our community;
- Consulting on the likely impact of proposed policies and functions in relation to the six strands and deprivation;
- Publishing the results of assessments, monitoring and consultation;
- Making sure that the public have access to information and services;
- Ensuring employees and members have the skills and knowledge they need in relation to equality and diversity to carry out their roles.

Overall outcomes for the Single Equalities Scheme

As well as the individual actions we will take to promote equalities across all the protected characteristics, as an organisation, we would like to achieve some key outcomes that have an impact across more than one or across all of the strands. These outcomes will help to develop a better understanding of our community and to encourage greater engagement with local people to help shape and influence how we deliver our services. They will also ensure that we meet all of our obligations under current legislation: we have a 'general duty' to eliminate discrimination, promote equality of opportunity and good community relations between people of different backgrounds. This general duty is supported by a number of specific duties, which will be addressed through these cross cutting outcomes.

We know this scheme cannot work in isolation from everything else we are trying to achieve as an organisation and through our partnerships – particularly Harrow

Strategic Partnership– and so we clearly identify what we are planning to do to progress equalities in Harrow and how that links to our corporate outcomes in **Table 3**.

How we developed our Single Equalities Scheme

In writing this Scheme, we have tried to be inclusive, open and transparent and this has been demonstrated through our consultation. The consultation was carried out in two stages. The first stage included an online questionnaire for our residents, service users, partners and stakeholders, and focus groups organised through Harrow Association of Disabled People for disability groups and Harrow Association of Voluntary Services for all other voluntary and community groups in the borough. We also attended meetings of various groups including the Older Peoples Reference Group and Harrow Lesbian Gay Bisexual Transgender (LGBT) Forum to consult on the Scheme.

Two workshops were organised to consult with employees, as well as an online questionnaire which was circulated through the Departmental Equalities Task Groups and the communications team. Elected members were also sent a link to the questionnaire. We also attended meetings of the employee self support groups (For example, Harrow Council Black Workers Group, and the LGBT Forum) to consult them on the scheme.

The second stage included a consultation on the draft Scheme and the proposed action plan. This included publishing the Scheme on our website and publicising it widely to employees, elected members, partners, stakeholders, residents and service users.

The key findings from the consultations are summarised below:

Our Employees said:

- Equality and diversity are important and need to be mainstreamed across the council;
- Equalities should be central to our recruitment process;
- Further equality and diversity training is

needed for all (especially frontline) employees, especially on LGBT and cultural awareness;

- There should be mandatory equality and diversity training for all managers;
- Staff forums are a positive step but need more support from managers;
- We have good accessible services but there is room for improvement;
- The workforce and members are largely representative but need to improve representation across all levels;
- There should be more consultation and engagement with employees on the development of policies and services;
- The appointment of the Equalities Officer is very positive and a way forward;
- Vitality profiles need to be shared and publicised widely;
- Improved mapping of communities will improve understanding of the needs of people living here;
- There should be improved communication and raised awareness of equalities and diversity across the council;
- There needs to be full commitment from all senior managers, employees and members;
- We need to visit more organisations and schools to talk about what we do at the council, so all people can see and hear;
- I think this is excellent and about time that this happened with in the Local Authority;
- Equality monitoring should be extended to all diversity strands.

Our communities said:

- Employment of Disability Advisor from

HAD and an Equalities Officer is positive;

- The Council should be honest and transparent and show full commitment to equalities and diversity;
- There needs to be a focus on outcomes and reducing inequality;
- We should work towards a representative workforce at all levels;
- The Access Group should be involved in and influence planning decisions, which is good practice;
- Ensure equality and diversity training is compulsory for all employees and elected members;
- Frontline employees should receive specific training to understand needs of service users e.g. Disability and Cultural Awareness;
- We need to raise awareness of the council's commitment to equalities and diversity and the SES to all employees and elected members;
- Work with the voluntary sector to deliver equality and diversity training for employees;
- Celebrate diversity with more community events e.g. International Day of Disabled People, LGBT History Month;
- Harrow Strategic Partnership needs to be more representative and have equalities at the heart of all its work;
- We should improve communication and engagement with communities;
- Extend Hate Crime reporting to all areas of the borough and raise awareness amongst employees, elected members and communities;
- The budget for making adjustments for those with disabilities should be held centrally. While this is not in Harrow, all equality measures required are done at the expense of other work or schemes. This discourages managers to respect equalities.
- We should develop a community

engagement strategy and move away from paper exercises.

Our Partners / stakeholders said:

- We should work in partnership to reduce inequalities across the borough;
- We should develop a central point for data sharing on our communities to set joint equality objectives;
- We should work together to avoid duplication;
- We need to raise awareness around equality monitoring and data collation;
- We need clear and concise equality and diversity objectives and policies to be published;
- More research is required around LGBT needs and requirements within the borough;
- More research around asylum seekers/refugees is needed to understand their needs;
- With regard to the voluntary sector, perhaps it might be worth ensuring that all groups applying for funding should have policies on for example, LGBT equality and are able to demonstrate that they are reaching all BAME groups effectively (unless they are providing a service to a single community group only).
- There should be more diverse events at Harrow Arts Centre.

Some positive feedback

- Employment of Disability Advisor from HAD and Equalities Officer is positive;
- Under One sky is a brilliant way of celebrating our borough's diversity;
- A workforce that is generally representative of the borough;
- The council is pro-active in promoting equality and diversity and celebrating cultural events;
- Support to employee forums e.g. Black Workers Group is good;

- Corporate Equalities Group is open and transparent;
- Generally, the Council as a whole has good practices and policy in these areas and it is important that it continues to do;
- Community cohesion is strong;
- The Council is good at monitoring and reporting on statistics relating to its employees;
- The council is committed to equality and diversity and willing to consult and implement new ideas;
- Clear and user friendly, good borough stats used;
- Its great to have all the EqIA's published;
- Good to have responsible names available (against EqIA's), one of the things which stops equalities from being effective is how hard it is to get recognition of responsible people;
- I think this is really well written, and I am delighted with the focus on action planning and responsibilities;
- I believe the document outlines in great detail the Council's objectives, having this in one document is a really good idea and shows the value Harrow put's in its equality policies.

So what have we done with all this information?

We have tried to make sure that the Schemes Action Plan reflects what we have been told by our communities, employees, elected members, stakeholders and partners. As well as contributing to the **key objectives** for our Scheme, the feedback from the consultations also helped us to shape and develop our SES as a whole.

Table 3: The cross cutting outcomes to be delivered by this Scheme

Objective	Corporate Priority	CREATE Value(s)
Develop a modern and diverse workforce to reflect the community we serve	<ul style="list-style-type: none"> Supporting and protecting people who are most in need United and involved communities: a Council that listens and leads 	<ul style="list-style-type: none"> Respect Actively One council Taking Responsibility Engaged Communication
Improve the data the council has on its residents and service users so all decisions can be taken and services developed in light of strong intelligence	<ul style="list-style-type: none"> Supporting and protecting people who are most in need United and involved communities: a Council that listens and leads 	<ul style="list-style-type: none"> Customer First Respect Taking Responsibility
Ensure that residents, service users and employees can influence decisions through effective communication and engagement	<ul style="list-style-type: none"> Supporting and protecting people who are most in need United and involved communities: a Council that listens and leads 	<ul style="list-style-type: none"> Customer First Engaged Communication Actively One council Taking Responsibility Energise and Improve
Deliver responsive services, improve customer care and increase customer satisfaction	<ul style="list-style-type: none"> Supporting and protecting people who are most in need United and involved communities: a Council that listens and leads Keeping neighbourhoods clean, green and safe 	<ul style="list-style-type: none"> Customer First Respect Engaged Communication Actively One Council Taking Responsibility Energise and Improve
Reduce inequalities through corporate commitment and partnership working	<ul style="list-style-type: none"> Supporting and protecting people who are most in need United and involved communities: a Council that listens and leads 	<ul style="list-style-type: none"> Customer First Respect Engaged Communication Actively One Council Taking Responsibility Energise and Improve
Promote diversity and community cohesion both within the council and the borough	<ul style="list-style-type: none"> Supporting and protecting people who are most in need United and involved communities: a Council that listens and leads 	<ul style="list-style-type: none"> Respect Engaged Communication Actively Once Council Energise and Improve

Our Responsibilities and Progress as an Employer

We are one of the largest employers in the borough and, as an employer, we want to lead the way in promoting equality and diversity and to be an employer of choice for people who want to work for an employer committed to equality of opportunity and developing a diverse workforce to reflect the community we serve.

As an employer, we have different responsibilities under each of the equality duties; this section explains how we will work towards meeting these requirements.

Our equality objectives as an **employer** are:

- Integrate equality of opportunity into all our functions and policies;
- Recruit and value a workforce that reflects the diverse makeup of Harrow's communities;
- Take positive action where there is under-representation in our workforce;
- Ensure all employees understand the vision and corporate priorities of the Council and the standards of behaviour both towards colleagues and members of the public that we expect from them;
- Make clear the action an employee or potential employee may take if s/he feels unfairly treated;
- Provide training to relevant employees so that they can actively put this policy into practice.

Equality of opportunity in employment

We are committed to promoting equality of opportunity in all aspects our recruitment and selection processes and are committed to a policy of equal opportunity for all existing and potential employees. Assessment for recruitment, selection, and appraisal, training and career progression

is based entirely on the individual's ability and suitability for the work.

We aim to provide a working environment where employees are valued and respected, and where discrimination, bullying and harassment are not tolerated. We are committed to developing a workforce which is representative of the community it serves at all levels and taking positive action to remedy the under representation. The Equality Framework for Local Government also contains a whole section on working towards achieving 'a modern and diverse' workforce.

Annual Equality Report

In line with the Employment Duty, the Council produces an annual equality report in relation to race, disability and gender on:

- The number of employees in post and at what grade;
- The number of applicants for employment, training and promotion;
- The number of employees who receive training;
- The number of employees who are involved in grievance procedures;
- The number of employees who are subject to disciplinary procedures; and
- The number of employees who cease employment with the Council.

Progress on workforce diversity and equality is reported to elected members annually at the **Employee Consultative Forum**.

Our most recent Annual Equality Report covering the periods 1st April 2009 to 31st March 2010 shows that as of 31st March 2010, the council employed 6,461 employees, including school-based employees. At the time, equality monitoring information on employees was only collected for age, gender, disability and

race. However, the Council is in the process of reviewing its monitoring policy with a view to extending the monitoring to all diversity strands to include religion or belief and sexual orientation.

The full report is published on our website, however a breakdown of the council's workforce is summarised below:

Age

Table 4: Breakdown of council's workforce in age groups

Age	Male	%	Female	%	Total
16 - 24	81	1.25%	177	2.74%	258
25 - 34	338	5.23%	890	13.77%	1228
35 - 44	337	5.22%	1249	19.33%	1586
45 - 54	427	6.61%	1561	24.16%	1988
55 - 64	363	5.62%	917	14.19%	1280
65 +	44	0.68%	77	1.19%	121
Total	1590	24.61%	4871	75.39%	6461

The table above shows that the Council continues to have an older workforce with the majority aged between 35 and 54, i.e. almost a third of the council's workforce. There are less than 4% of employees under the age of 25 and a small number of employees aged 65 or over.

The increasing age of the workforce will lead to high turnover in future years and potentially high numbers of vacancies, increasing costs of temporary or agency cover and recruitment and retention difficulties. Plans to start to address this position where possible are reflected in the Strategy for People Action Plan.

Disability

The percentage of employees of the total workforce declaring a disability this year is 1.89% which is lower than the percentage employed in 2008/9 of 2.08%. This is somewhat contradicted by the employee survey where 8% of respondents stated

that they were disabled (although it is worth noting that only 55% of employees responded to the survey).

This year has seen an increase in the percentage of appointment of disabled applicants from 3.3% in 2008/9 to 4.7% in 2009/10 (although the numbers involved – 6 appointments – is so low as to be not statistically valid).

In order to improve on our performance, two activities have already been undertaken. Firstly, the application form used by candidates for jobs was considered to be deterring disabled people from applying for jobs with the council or of declaring if they had a disability. The question on disability has been modified to encourage more disabled people to declare. Secondly, employees may become disabled whilst employed by the council and there is currently no system for gathering information on this change. Employee Self Service (direct employee access to personal records) is being rolled out across the council from 2009/10 and employees will be asked to update their employment records so that more accurate information is held.

The Council continues to encourage applications from disabled applicants by stating its commitment to the two-tick symbol in the vacancy bulletin and in the information pack for job applicants. The application form has been modified to encourage disabled applicants. The Council will also be encouraging employees to self-declare if they become disabled during employment through the roll-out of Employee Self Service enabling employees to update their personal details in SAP.

The Council also continues to consult local disability groups and works closely with Harrow Association of Disabled People (HAD and explore further initiatives to improve in this area.

Gender

The Council set a target to achieve a balanced workforce, which reflects the gender profile of the local community of Harrow. This year's statistics show that the percentage of women in the workforce is 75.39% and men is 24.61%. The Council employs a far greater percentage of women than men and this is disproportionate to the composition of Harrow's general population of 49.98% women, 50.02% men. Possible reasons which attract women to apply to and remain employed by Harrow Council are its wellbeing policies and benefits including part-time and flexible working arrangements.

A lower number of men are employed at every level across the Council except for Payband 6 (highest payband) where there are 11 men and 5 women. This is the same pattern as the previous year. The Council remains committed to enabling women to develop into senior roles in the Council (a programme will run this year) and continues to operate Springboard Training specifically aimed at encouraging women in lower grades to progress.

Race

This year the percentage of employees from BAME groups in the workforce is 34.13% compared to 33.51% in 2008/9. The proportion of BAME employees in the workforce continues therefore to increase.

The council's aim is to have a workforce that is representative of its local community. Based on the ONS MYEs for 2007 the percentage of working age (18-65) people from BAME in the local community is 48.35% and the BAME general population in Harrow is 54.89%. We recognise that the composition of our workforce remains lower than both the BAME general population and the BAME working age population of Harrow and we will endeavour to increase our BAME workforce.

The Council, year-on-year, shows an increasing proportion (one-third) of the workforce made up of BAME employees.

The chart below shows that the majority of these employees are represented in the lower pay bands with decreasing levels of representation until an increase is evident at pay band 6.

The overall percentage of applications received from BAME applicants has increased to 66.9% compared to last year (64.0%). This is the second consecutive year the proportion of applications from BAME groups has increased and is in excess of the economically active proportion of BAME people in Harrow, which is 48.35%. This indicates that the Council is successful in consistently attracting BAME applicants.

Whilst 66% of applications received were from BAME applicants, only 55% of shortlisted candidates were from BAME groups and only 42.7% of appointments.. These figures are similar to those in the previous report. Harrow Council has not met its target of 48.35% of appointments from BAME groups.

In order to improve on our performance in this area, a sub-group of the Corporate Equalities Group has been established to undertake a closer analysis to understand why external BAME applicants are less successful than internal BAME employees.

Table 5: Ethnicity by payband in Harrow Council (including school employees) as at 31 March 2010

Group	Payband 1	Payband 2	Payband 3
White	31.11%	32.66%	25.64%
BAME	43.08%	32.70%	19.37%
Group	Payband 4	Payband 5	Payband 6
White	7.70%	2.53%	0.35%
BAME	4.40%	0.36%	0.09%

(Payband 1 is the lowest and 6 the highest grade)

Recruitment initiatives

- The Council has entered into a **Local Employment Partnership** with JobCentrePlus. A Job Brokerage

scheme has been established led by HRD and the Regeneration Unit to co-ordinate recruitment to posts.

- We have used the **Kickstart** recruitment initiative for recruiting 10 trainee Benefits Officers for the Revenues and Benefits department. Training Synergy worked in partnership with the department to attract, assess, select and induct suitable candidates.
- We brokered the development of a **Voluntary Sector on-line advertising service** with Jobsgopublic and Harrow Association for Voluntary Services. This enabled the 200+ voluntary sector organisations within Harrow to post their vacancies on a bespoke website. On the Council’s own job vacancy pages on our website, there is now a clear link for candidates to view vacancies within the voluntary sector.

We are also pursuing various avenues to promote job opportunities to all members of the community.



These include retaining our commitment to the Job Centre Plus Positive about Disabled People scheme which

allows the council to use the two tick logo on its recruitment forms, letterheads and website.

To build on our good practice and commitment of developing a diverse workforce, we can consider further initiatives including Age Positive and Stonewalls Diversity Champions programme.

Equality Act 2010

There is a specific duty requiring public authorities with 150 or more employees to publish the gender pay gap in their organisation and the percentage of ethnic

minority and disabled people they employ. We will build this requirement into our annual equality monitoring report.

Employment and equal pay – including recruitment

Despite the introduction of the Equal Pay Act in 1970, latest figures from the Annual Survey of Hours and Earnings (ASHE) show the gender pay gap (as measured by the median hourly pay excluding overtime of full-time employees) widened between 2007 and 2008. The gap between women's median hourly pay and men's was 12.8 per cent, compared with a gap of 12.5 per cent recorded in April 2007, when it was at its lowest since records began. The median hourly rate for men went up 4.4 per cent to £12.50, while the rate for women increased by 4.1 per cent to £10.91.

A lower number of men are employed at every level across the Council except for Payband 6 where there are 11 men and 5 women. This is the same pattern as the previous year. The Council remains committed to enabling women to develop into senior roles in the Council (a programme will run this year) and continues to operate Springboard Training specifically aimed at encouraging women in lower grades to progress

Table 6: Gender by payband in Harrow Council (including school employees) as at 31 March 2010

Gender	Payband 1	Payband 2	Payband 3
Male	454	567	378
Female	1871	1557	1115
Gender	Payband 4	Payband 5	Payband 6
Male	136	44	11
Female	261	62	5

One requirement of the gender equality duty is that the Council must: “consider the need to include objectives to address the causes of any gender pay gap”. Such objectives must focus on the three main

causes of this gap, which are pay discrimination, caring responsibilities and occupational segregation. The last category means that, if necessary, the Council must avoid the concentration of men and women into particular occupations, which can promote traditional gender stereotypes such as women doing admin work and men undertaking more manual roles.

To monitor that women are not under-represented in the higher paid jobs within the council (often referred to as the “glass ceiling effect”), every year the council provides data to the Audit Commission showing the percentage of its female employees who are in the top 5% of its overall earners. As of March 2010 for Harrow this was 48.28%.

Corporate Equality and Diversity Performance Indicators

A number of performance indicators measure our performance against developing a diverse workforce. The table below tracks our performance against these indicators over the last three years.

Table 7: Our performance against equality in employment performance indicators

Performance Indicator	08/09	09/10	10/11 Target
BV11a –top 5% of earners authority that are women.	46.15%	48.28%	50%
BV11b –top 5% of earners that are from a BAME group.	16.15%	16.55%	18.5%
BV11c –top 5% of earners authority with a	3.85%	1.38%	3.85%

disability			
BV16a - % employees of the total workforce declaring a disability.	2.08%	1.89%	5%
BV17a - % of BAME employees	36.52%	37.34%	39%

The table shows that there has been a steady increase in BV11a and BV17a but a decrease in indicators 11c, and 16a. In order to identify initiatives and actions to improve our performance in equalities in employment, a sub-group of the Corporate Equalities Group has been set up to address this.

Training and development

The Council recognises the importance of raising awareness of the specific equality duties under the Public Equality Duties and their implications on us a Local Authority, and ensuring all employees and elected members have access to adequate equality and diversity training to develop their knowledge, skills and understanding to carry out their roles.

Our corporate learning and development programme offers a range of equality and diversity courses which include:

- An e-learning module on Equality Impact Assessments which is currently being rolled out to all middle managers and above;
- A half day classroom session on EqlAs open to all employees interested in developing their knowledge on EqlAs;
- Two half day Disability Equality training for employees delivered through our contract with Harrow Association of Disabled People (HAD);
- Two half day Diversity and Cultural Awareness sessions provided by Focal Vocal which include a theatrical performance and role play looking at

types of discrimination, barriers in service delivery and improving frontline services and customer care.

The Corporate Induction for all new starters includes a section on equality and diversity which briefly looks at our corporate policies, public duties and mainstreaming equalities across the organisation. The managers' induction also includes an hour long section on 'Equality and Diversity' which elaborates further on the content from the corporate induction. The induction programme for newly elected members also includes similar material.

Our **Middle Management Development Foundation Programme**, accredited by the Institute of Leadership and Management, was launched in October 2008. Delivered by our partner, Capita, by July 2009, 220 managers (40% of whom were BAME) had been through the 7 module programme with 80% demonstrating satisfaction that it had met its objectives.

In order to ensure the equality and diversity training is adequate and accessible for all employees and elected members, we will:

- In partnership with the organisational development team and customer services, undertake a needs analysis of equality and diversity training with a view to rolling out 'Customer First' training for all frontline employees;
- Undertake a comprehensive review of the equality and diversity training with a view to developing a corporate equality and diversity training programme;
- Continue to provide equality and diversity training as part of the corporate induction;
- Continue to provide equality and diversity training as part of the managers induction;
- Continue to provide ongoing training and support on EqIAs;

- Review and develop an equality and diversity programme for members;
- Produce and distribute diversity at work handbook for both employees and elected members.

Protection of carers

The Equality Act 2010 extends protection for persons who are 'linked to' or 'associated with' a person who is of another sexual orientation, race or religion, to disability, gender and age or gender reassignment. We have a range of employee benefits, e.g. special leave requests, flexible working, compressed hours which all employees can request. The council is also working with employees to establish an employee Carers Forum.

Our Responsibilities and Progress as a Service Provider

As a service provider we have different responsibilities under each of the duties and this section details the methods we will use to meet the different requirements of the duties.

As adopted in our Equal Opportunities Policy, our equality objectives as a **service provider** are to:-

- Provide equal access to service users and potential service users.
- Provide services that recognise and are sensitive to the cultural needs of our diverse communities.
- Encourage the participation of service users so that they can influence the way their needs are met.
- Seek to influence partner organisations in a collective commitment to Equality of Opportunity.

Although we have made good progress in embedding and mainstreaming equalities across the organisation to improve our services, we are aware we could improve which we hope to do through this SES.

Equality Impact Assessments (EqIA's)

The Race, Disability and Gender Equality Duties require local authorities to assess all their functions, policies and procedures for potential adverse impact or discrimination with regards to race, disability and gender. However, in Harrow we also assess for adverse impact against age, religion or belief, sexual orientation and socio economic inequality.

EqIAs provide a self assessment tool to identify the equality consequences of a service, function or policy for particular groups or communities. The assessments ensure that any adverse impact or discrimination on a particular group or

sector of the community can be eliminated or minimised by specific actions. By carrying out EqIAs, we can make sure we do not discriminate but promote equality and diversity and ensure everyone can access our services.

In line with our responsibilities, we have recently undertaken a review (Test of Relevance) of all our functions, policies and services assessing for relevance and prioritised them as High, Medium or Low. This review also informed the departmental and Corporate EqIA Programme for the next three years (2011 / 13) (Appendix 3).

All completed EqIAs will be published on the council's website and any actions arising from them will be incorporated into service plans to ensure implementation and monitoring.

Equality Framework for Local Government (EFLG)

In April 2009, the Equality Standard was superseded by the Equality Framework for Local Government which has been simplified, incorporates the latest equalities legislation and duties and emphasises outcomes rather than processes. The new framework consists of three (developing, achieving, excellent) levels instead of five under the old standard. There are key achievements for local authorities to demonstrate under each of the new Levels. In addition, there are five key components to the new Framework which are called the **Five Areas of Change Management**: which are:

1. Knowing your communities and equality mapping
2. Place shaping, leadership, partnership and organisational commitment
3. Community engagement and satisfaction
4. Responsive services and customer care

5. A modern and diverse workforce

Our progress - Following an internal peer assessment in 2008 the Council declared it had achieved Level 4 of the old Equality Standard for Local Government.

Subsequently, a commitment was made to achieve the 'Excellence' level of the new framework by March 2012.

As part of developing this SES, a Council wide internal audit was undertaken against the 'Excellent' level of the new Equality Framework. The audit highlighted some good practice and also areas in which we can improve. Actions from this assessment have been incorporated into the SES Action Plan.

Equality monitoring and how the information will be used

We have a statutory duty to monitor for any adverse and differential impact in terms of race, gender and disability. Any information gathered will be used to improve existing services and functions, or introduce new ones, as appropriate. The information will also inform EqlAs and the development of service equality objectives and targets. In addition, the information can be used to monitor the impact of our policies and practices on recruitment, development and the retention of employees.

We recognise that, in many cases, we have only limited information and evidence about the extent to which our services and functions take account of our service users' age, disability, gender, race, religion or belief and sexual orientation.

We acknowledge that it will take time to build up a body of evidence against which we can monitor progress. We will use some of the following methods to gather information:

- equality impact assessments;
- formal surveys;
- local networks;

- our own customer, resident, employees and councillor surveys;
- analyses of complaints;
- service/policy specific monitoring and consultation;
- feedback at community events.

We also recognise that monitoring by equality strands can be a sensitive issue, and that some people do not understand why we want to have this information about them. We will ensure that with any monitoring we undertake, we will fully explain the reasons why we are collecting data and that it will help us to ensure our services are accessible by all and that no barriers exist when people are trying to access our services.

We will ensure that our employees are trained in equality monitoring and confident in explaining to our customers why we are asking for the information and what it will be used for.

Procurement

Procurement's role in addressing equalities and diversity is two fold – firstly, the Council promotes equalities and diversity within its procurement processes and practices. The objective is to offer fair, open and equal access to all opportunities by advertising on the council's website and a process that is robust to ensure that no bidder is discriminated in any way.

Secondly, within tender processes, equality and diversity is a key award criterion and all potential contractors, suppliers, bidding to deliver services on behalf of the council have to be compliant with all new legislative requirements on equalities and diversity.

In order to achieve this, the council has a procurement strategy in place that offers guidance notes and templates to council officers that highlights the importance of procurement services in local councils to pro-actively promote equalities and diversity in line with new legislative duties in this area.

To ensure our procurement practice is fair and open to all potential suppliers and contractors and that they comply with our equality and diversity policies, all stages of the procurement process highlight our commitment and ask applicants to demonstrate their commitment and practices in promoting equality of opportunity.

We will ensure that our procurement policies and practices support the SES by:

- insisting that our appointed contractors share and help deliver our equal opportunities goals;
- making sure our selection and tendering processes positively address and include equality considerations;
- rigorously monitoring our contracts for compliance;
- including appropriate terms and conditions;
- training employees in equalities issues for procurement.

Ensuring public access to Information and services

We recognise that individual members of the public and sections of our community may experience barriers in accessing information and services. We therefore make an overarching commitment through this scheme to ensure that our information and services are available in accessible formats.

We will seek to improve access to information and services by ensuring:

- all information is written in plain English;
- all information is available in accessible formats such as Braille, large print, CD;
- a clear strap line is on information leaflets explaining how to obtain information in accessible formats;

Our last Access to Services inspection by the Audit Commission in 2007 recognised that we provide ‘fair access to services’ with

uncertain prospects for improvement. The audit acknowledged the council had a ‘strategic approach to equalities and diversity and it understood the complexities of delivering services to a diverse community.’

We were also commended for providing ‘good access to services through the One Stop Shop and contact centre known as Access Harrow, with full disabled access, translation services and with a self-serve kiosk for payments, giving local people increased equality of access to services.’

Access Harrow, one of our first business transformation projects, is a ‘one stop shop’ and call centre for a range of services. This was established in 2006 and was recognised as Contact Centre of the Year in 2007 (Good Communication Awards) and awarded the Cabinet Office Customer Service Excellence award in 2009. We benchmark Access Harrow performance against other London Boroughs as part of the Customer Services for London Group. In January, 2010 Access Harrow outperformed other Boroughs on technical knowledge and was best for overall satisfaction. We were ranked second in customer service.

A mystery shopping exercise carried out through December 2009 to January 2010 showed an improvement in three of the four channels compared to a similar exercise in October – November 2008.

The table below shows the outcome of this exercise and the satisfaction level in percentages.

Table 8: Mystery shopping exercise, access channels

Period	Email	Letter	Phone	Visits
Oct – Nov 08	48%	30%	56%	71%
Dec 09 – Jan 10	47%	50%	60%	81%

There was also an improvement in four of the five areas with regards to location and accessibility. Adequate parking went up from 23% to 100% and the signage to disabled toilets from 51% to 56%.

Compliments and complaints

As well as completing questionnaires and attending focus groups, individual services can encourage people to use the compliments and complaints procedure for feedback on good service as well as areas for improvement. This information is used in carrying out Equality Impact Assessments to inform policy development and help improve services.

Communication, Consultation and Partnership Working

Communication

The Council recognises that one of the challenges to improving resident satisfaction is how we inform them about the many services and benefits the Council provides. We also recognise that we need to take specific action to overcome communications barriers with regard to accessibility due to disabilities and language. In order to address these issues, we have recently produced a Corporate Identity Guide that brought in a consistent look and feel for all communications developed in partnership with Harrow Association of Disabled People (HAD) and advice from the Royal National Institute for the Blind.

We inform our residents about our services in a number of channels including the Council's bi-monthly magazine *Harrow People*, and specific campaigns that focus on a single issue or topic.

We have also recently updated our website to improve its accessibility and DDA compliancy. However, we appreciate we can improve on this further and will undertake an impact assessment to identify further improvements.

With regards to internal communication, the communications team produce a weekly employee newsletter (The Grapevine), access to the Hub (Harrows Intranet Site) and also use regular employee communication updates via email. We also have a monthly Chief Executive's newsletter and quarterly employee newsletter 'The Arrow' which is cascaded to all employees including those who don't have access to a computer.

As well as receiving these publications, councillors have a dedicate newsletter called the Member Information Bulletin.

Consultation and community involvement

The involvement of our residents, service users, employees, elected members, stakeholders and partner organisations is essential to ensure their needs and requirements are incorporated in policy and service development to deliver responsive services.

As well as consulting members of the public, we consult with various community and voluntary groups representing specific sections of our community. However, we realise we can improve on our consultation and particularly we want to obtain the views of groups who are the "seldom heard". This will involve developing new and innovative means of consultation. This will involve developing new and innovative means of consultation. The Council launched its 'Lets Talk' campaign in October 2010, specifically aimed at increasing awareness of the Council's priorities and asking residents what their priorities are. Lets Talk is also about changing the relationship of residents with the Council so that the community can become more involved in Council activity and discussion.

We also consult internally within the Council, including with elected members, Corporate Strategy Board (Chief Executive and Corporate Directors) Corporate Leadership Group (Directors and Divisional Directors), Managers Forum (Heads of Service, Service Managers and Senior Professionals), Employee Support Groups, employees and the trade unions. However, we appreciate we could improve on this by looking at ways to consult and engage more with employees such as the Departmental Equalities Task Groups.

The Council's Consultation Strategy (2009) set out how the Council intended to raise its level of consultation performance to match current and future expectations by having a

coordinated and effective approach to consulting our community. This is being pursued by using a range of methods such as our residents' panel which consists of 1,200 residents that are a representative sample of our population, focus groups, service users groups, e-participation etc.

The Consultation Toolkit provides detailed guidance on best practice in consultation from choosing the best methodology, carrying out Equality Impact Assessments to analysing and feeding back the results, processes for co-ordination, and a database of consultation outcomes through a consultation finder. In the current financial climate, consultation is even more important as the decisions with significant consequences will have to be taken over the next couple of years.

Disability Forum

In 2009, the Council established a Disability Forum consisting mostly of people with a disability to advise on policy development and review. The Forum has the ability to comment on emerging policies and have their views reported to the Cabinet.

Place Survey

The Place Survey provides information on people's perceptions of their local area and the local services they receive. Some of indicators within the Place Survey link to equality and diversity and community cohesion. The results of these from the 2008/09 Place Survey highlighted that:

- 76% of respondents believed people from different backgrounds get on well together in their local area, which is the same as London as a whole.
- 55% of respondents felt they belonged to their neighbourhood, which is higher than London (51%) as a whole.
- Only 5% said race relations needed to be improved in Harrow compared to 6% in London as a whole.

These results highlight that the borough performs well on the indicators relating to

equality and diversity. The Place Survey has now been discontinued by the Government.

Employee's networks and groups

Employee's networks and groups are useful forums, not just for employees gaining peer support, but also for specific equality areas to have an active role in influencing decision-making processes across the organisation.

We have four corporate employee self support groups, Harrow Council Black Workers Group, Disabled Workers Group, Staff Lesbian Gay Bisexual Transgender Forum and a Staff Carers Forum. All groups are supported by the council and employees are allowed time off to attend meetings. The chairs of these groups are also invited to the Corporate Equalities Group to provide opportunities for generic equality issues to be raised.

Employee Survey

The employee survey helps the council to take the temperature of the organisation in relation to levels of satisfaction and motivation, opinions on management and supervision, the quality of communications and learning and development, and to invite feedback on employment conditions and the working environment. The survey gives employees an opportunity to voice their opinions in confidence and to help the council meet its aims of being an employer of choice.

Results for 2009 paint a positive picture of improvement for the organisation. Eighty per cent of indicators show an improvement since 2008, including 30 showing a significant positive shift in views about the organisation.

Table 9: Fairness and Equality (employee survey)

Indicators ranked by impact on factor	2008 %age	2009 %age
Harrow demonstrates	52%	60%

through its actions that it is committed to being an equal opportunities employer		
I am treated with fairness and respect at Harrow	55%	62%
Systems for reward and recognition in Harrow are fair and transparent	22%	34%

Results for all three indicators are more positive, with the indicator for systems of reward and recognition being fair and transparent seeing a significant increase, though it remains the lowest score at 34%. It is however significantly higher than The Work Foundation benchmark.

The most important factors in terms of engagement are the Council's commitment to being an equal opportunities employer and people feeling that they are treated with fairness and respect, and both indicators attract the agreement of almost two thirds of employees.

As with other indicators, while results are positive for the organisation as a whole, results by different groups vary more widely.

Looking at other groupings, we see that employees with disabilities are less likely to agree with any of the positive indicators, and have particularly negative opinions about the fairness and transparency of the reward and recognition systems.

By ethnicity, respondents of Caribbean origin are less likely to feel that the council demonstrates its commitment to equal opportunities or that they are treated with fairness and respect, while 'other' ethnic groups are less positive across the board. By sexuality, gay and lesbian respondents are less positive across a number of factors.

The Employee Survey results showed that we have improved in demonstrating that the Council is committed to being an equal opportunities employer. However, this perception varies between black, Asian and

white employees and by those with disabilities or who are lesbian, gay or bisexual. To understand and develop responses to this, we will:

- explore this issue further and take action to improve performance and perception on equalities;
- ensure that Directorate Equalities Task Groups consider equalities issues arising from the employees survey;
- develop and implement a programme to support minority employees into senior positions.

Partnership Working

The council recognises the importance of working with partners and this section briefly looks at some of our key partnership projects which include reducing inequalities, promoting equality of opportunity and tackling discrimination. Whilst working in partnership, we are still responsible for meeting the general duty to promote race, gender and disability equality.

Some examples of partnership working addressing inequalities are listed below:

- **The Harrow Strategic Partnership (HSP)**
The HSP is a group of key local public, business and voluntary sector organisations, including the Council, working together to improve the quality of life for everyone in the Borough. They have recently updated the Community Strategy for the Borough which includes the ambition to 'Improve the quality of life, by reducing inequalities, empowering the community voice and promoting respect and becoming the safest borough in London' which includes working to reduce inequalities within the borough.
- **Harrow Hate Crime Forum** The multi agency forum on racial harassment was set up in 1995 and comprises representatives from a number of local community/voluntary and statutory

groups- all specialists in the area of racial harassment. The Forum monitors the extent, frequency, patterns and features of racial and religious harassment in Harrow. The Forum discusses its causes and effects, and advises and assists in the creation and implementation of preventative measures. Residents and service users can report a Hate Crime through one of the 24 Third Party Reporting centres. Over 2010/11 the Hate Crime Forum will be expanding the Third Party Reporting sites to cover all six diversity strands.

The Harrow Community Roadshow 2009 was devised and implemented in response to evidence of under-reporting and under-recording of hate crime and community tension issues in the borough. Many victims of hate crime had reported that they were not aware of Third Party Reporting, Crown Prosecution Service investigative and court procedures.

Thousands of flyers, key literature and memorabilia have been distributed around the borough which detail telephone numbers, email addresses, walk in centres and websites where people can report hate crime and community tension issues. Further information has also been distributed about investigative procedures of the local authority and criminal justice agencies. Over 1,000 residents of Harrow were engaged by consultation through questionnaires, the confidence thermometer and talking face to face via interviews on camera.

Reporting hate crime to the police in Harrow has also significantly improved. Since April this year, residents have been able to report a crime in person and make enquiries at a new **Police Information Centre** located at the Civic Centre, which offers many people a more convenient way of reporting a hate crime. This is another partnership initiative between the council and the

police to deliver a public service, epitomising partnership working.

- **The Interagency Somali Taskforce** - is an award winning example of partnership working where the Council, Police, NHS Harrow, Job Centre Plus, VCS have come together to address the challenges facing the local Somali Community. The project won the best project under the community development awards in February 2010.
- **Improving Health and Wellbeing** - with the exception of Black Caribbean and Irish populations, all other minority ethnic groups have lower rates of adherence to the Chief Medical Officer's recommendations. Due to Harrow's diverse population, it is important that our programmes cater for the different needs of our community to achieve increased physical activity rates. For example, women's badminton sessions are now held at the Harrow Leisure Centre to encourage participation of more women from an ethnic minority background. The programme has been very successful, and, as a result, plans are being put in place to sustain the programme for a longer period of time. Iwanaaji Somali Disabled Association was also awarded over £12,000 in December 2009 by the Harrow Partnership to increase Somali adults' participation in sport. The project was launched in February 2010 and to date three Somali Women have been trained as Community Walk Leaders in collaboration with Harrow NHS. Focus groups have also been held with 100 Somali people with the majority attending being woman. Selective badminton and swimming programmes have since been set up as a response to their described needs.
- **Narrowing the Gap Golden Threads programme** - Harrow is a high achieving education authority. However, as is the case with many other authorities, we have some groups which are not

achieving as well and our high achieving schools include students from more deprived families and students who under achieve.

To help these pupils, we have focussed a large amount of work around the attainment gap between pupils from Black Caribbean, Somali and our White working class communities and their peers in Harrow's Schools. We have implemented a Narrowing the Gap Golden Threads programme throughout our schools in Harrow, which includes working with the school leadership to integrate and lead on Narrowing the Gap initiatives in their school improvement plan.

The performance of our Black Caribbean pupils has increased at both Key Stages 2 and 4, with 44% of our Black Caribbean pupils achieving 5+ A*-C GCSEs including English & Maths. This result places Harrow above both national attainment and a majority of our Statistical Neighbours. Similarly the performance of our White British pupils eligible for free school meals at Key Stage 4 has significantly improved over the last two years.

- **Specialised Weekend School** - In May 2009 a project was delivered jointly by Harrow Council and PAIWAND (An Afghan community association specialising in running Supplementary Schools) aiming to establish and successfully run a weekend school for 50-60 disadvantaged children from Harrow studying at Key Stage 1 and 2. The young people assisted all met the national 'narrowing the gap' definition of disadvantage. The project successfully surpassed its original target of 60 and currently supports about 100 children from the targeted groups, with a further 40 identified by schools on the waiting list. Initial results show that virtually all children have made progress including, moving up sets, and parents have commented that children are catching

up or have caught up with their peers.

- **The Recession Busting Group** was established to reduce the impact of the recession in Harrow. The Group comprises cross-council senior officers and external partners including Job Centre Plus, Citizen's Advice Bureau, Harrow in Business, the Primary Care Trust and Harrow Association of Voluntary Services (HAVS). In August 2009 funding was provided to HAVS to deliver workshops for their member organisations.

The aim of the workshops was to increase awareness and understanding amongst Harrow's voluntary and community organisations of the help available to their clients during the recession. The workshops covered themes which were highly relevant to voluntary and community organisations and their clients including Employment and Flexible Working, Debt, Employment, Benefits, and Legal Advice, Mental and Emotional Wellbeing, and Housing Issues.

- **London Equalities Network** - The council is part of the London Equalities Network which aims to build a strong partnership of practitioners across the capital who work together, to deliver real equalities outcomes for those who live, work and visit London. This includes sharing best practice to ensure a consistent approach across the county and working in partnership to reduce inequalities.
- **Harrow children's Trust** provides a forum for leaders in Harrow to agree on priorities for children through the children and young people's plan. A needs assessment, led by the Primary Care Trust provides the evidence to inform commissioning intentions and agreement on vulnerable groups at risk of under achieving and targeted by all partners for early intervention and support.

Public Equality Duties

Equality Act 2010

The Equality Act 2010 received Royal Assent on 8 April 2010 and the primary aim of the Act is to consolidate and harmonise the existing equalities legislation and also introduces some significant new provisions (Appendix 1). The Act also proposes to introduce a new Public Duty incorporating the existing duties (Race, Disability and Gender) and extending this to age, religion or belief, sexual orientation, transgender and social-economic inequality. However, the proposals are still at the public consultation stage and therefore the requirements of the existing duties are still in place and explained below.

Race Equality Duty

In response to the Stephen Lawrence Inquiry report, the government toughened race relations legislation by giving public authorities a legal duty to promote race equality. The aim of the duty is to make race equality a central part of the way public authorities work, by putting it at the centre of policy-making, service delivery, regulation and enforcement, and employment practice.

Amendments were made to The Race Relations Act 1976, with statutory orders being introduced in 2001, which gave public authorities a statutory duty to promote racial equality (commonly referred to as the Race Equality Duty). As a result, all public bodies need to ensure that they are meeting the challenge of ensuring race equality and promoting race equality by:

- eliminating unlawful racial discrimination;
- promoting equality of opportunity;
- promoting good relations between persons of different racial groups.

Specific Duties

The duty requires us to produce a coherent strategy and race action plan, covering all relevant functions and policies. We have to make clear how we plan to meet both the general and specific duties; linking our corporate aims and objectives to our overall approach to racial equality and include an action plan, setting out how this will be delivered. We are required to:

Monitor by racial group the number of:

- applicants for employment, training and promotion;
- employees in post.

Employers with more than 150 full-time employees, must also monitor by racial group employees who:

- benefit or suffer detriment as a result of performance assessment procedures;
- cease employment;
- are involved in grievance procedures;
- are the subject of disciplinary procedures;
- receive training.

The results of this monitoring have to be published annually, and we must use the data collected to show that we are actively meeting the three elements of the general duty in employment functions.

With regard to the specific duties for policy making and service delivery, we are required to publish a Race Equality Scheme (this SES) which includes:

- a. a statement of the functions and policies we have assessed as being relevant to the general duty to promote race equality; and

b. our general duty to promote race equality, setting out our arrangements for meeting the duty by:

- monitoring policies for any adverse impact on race equality;
- assessing, and consulting on, the likely impact of proposed policies;
- publishing the results of assessment, consultation and monitoring;
- making sure that the public have access to information and services;
- training employees on the general duty.

Disability Equality Duty

The Disability Discrimination Act 1995 was amended by the Disability Discrimination Act 2005 which places a statutory General Duty (known as the Disability Equality Duty) on all public authorities to promote disability equality. The 2005 Act provides a robust legislative framework which requires Councils actively to promote disability equality. This means when carrying out their functions and services, we must have due regard to the need to:

- Eliminate discrimination that is unlawful under this Act;
- Eliminate harassment of disabled persons that is related to their disabilities;
- Promote equality of opportunity between disabled persons and other persons;
- Take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons;
- Promote positive attitudes towards disabled persons;
- Encourage participation by disabled persons in public life;

'Due regard' means that in all our decisions and functions, the council should give due weight to the need to promote disability equality in proportion to its relevance. It will not always be possible for the council to

adopt the course of action which will best promote disability equality.

For disabled people this could mean treating them more favourably to ensure that there is equality of outcome. For example, under the two tick disability initiative candidates who meet the essential criteria are guaranteed an interview.

As before the Equality Act 2010 places a duty on employers to make reasonable adjustments for staff to overcome disadvantage resulting from impairment; for example, by providing assistive technologies to help visually impaired staff use computers effectively.

However, the Act includes a new protection from discrimination arising from disability. This means that it is discrimination to treat a disabled person unfavourably because of something connected with their disability (e.g. a tendency to make spelling mistakes arising from dyslexia). This type of discrimination is unlawful where the employer or the person acting for the employer knows or could reasonable be expected to know that the person has a disability. This type of discrimination is only justifiable if an employer can show that it is a proportionate means of achieving a legitimate aim.

Additionally, indirect discrimination now covers disabled people. Unless it can be justified, a job applicant or employee could claim that a particular rule or requirement disadvantages people with a disability.

Specific Duties

The specific duties are intended to provide a framework to help us to plan, deliver and evaluate action to meet the general duty and to report on these activities. The specific duties state that we must:

- publish a disability equality scheme (included in this Single Equality Scheme);

- involve disabled people in producing the scheme and action plan;
- show what actions are taken in the scheme, and what appropriate outcomes are achieved;
- report on progress and revise the scheme.

Definition

The Equality Act 2010 changes the definition of disability and has made it easier for a person to show that they are disabled and protected by disability discrimination. Under the Act, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities, which would include things like using a telephone, reading a book or using public transport.

Disability covers a variety of impairments such as:

- Learning disabilities;
- Mental health issues;
- Mobility impairments;
- Blindness and partial sight;
- Deafness and hearing impairment
- Progressive long-term health conditions.

Using the widest definition, there are more than 11 million disabled people in the UK, more than one in five of the adult population and one in twenty children.

Gender Equality Duty

The Equality Act 2006 places a statutory General Duty (known as the Gender Equality Duty) on all public bodies. This means, that when carrying out its functions and services, the council must have due regard to the need to:

- Eliminate unlawful discrimination and harassment; and
- Promote equality of opportunity between men and women.

'Unlawful discrimination' in relation to gender is defined as:

- Direct and indirect discrimination on grounds of sex;
- Discrimination on the grounds of pregnancy and maternity leave;
- Discrimination on the grounds of gender reassignment;
- Direct and indirect discrimination against married persons and civil partners;
- Victimisation;
- Harassment and sexual harassment.

The general duty applies to the council's policy-making function, its role as an employer and provider of local services and also its responsibility to exercise any statutory discretion and its decision-making. The duty also extends to public services and functions that are undertaken by contractors.

As well as considering issues of gender equality when making decisions about the future, the Council must also take action to tackle the consequences of decisions in the past which failed to give due regard to gender equality. This will entail identifying and addressing any significant inequalities resulting from policies currently in place.

Whilst there is a tendency to focus on equality for women when looking at gender issues, this Scheme equally applies to men as well as the particular needs of transsexual and transgender people where they suffer discrimination because they have undergone, or are about to undergo gender reassignment.

Specific Duties

To support progress in delivering the general duty, there are also a number of specific duties that the council must comply with and these are to:

- Produce and publish a gender equality scheme (included in this SES);

- Implement the actions set out in the scheme within three years;
- Publish an annual progress report;
- Review of the scheme every three years.

Violence against women and girls

Harrow Council is actively involved in ending all forms of violence against the person, specifically targeting Violence Against Women because of the disproportionate impact and the fact that it is both a cause and consequence of inequality. To achieve this Harrow Council has employed a Violence Against Women and Girls Coordinator who works proactively across the multi agency partnership to ensure there is a coordinated strategic approach to tackling violence.

By March 2011 there will be an **Interpersonal Violence Strategy** in place which will provide a coordinated approach to tackling all forms of violence against the person in Harrow. This is to address the often fragmented approach and provide links across all forms of violence to better meet the needs of victims (who often experience more than one form of violence). It will also aim to remove the crisis driven approach and put prevention at the heart of the strategy. The types of violence covered by this strategy include:

- Domestic Violence and Abuse
- Forced Prostitution
- Forced and Early Marriage
- Female Genital Mutilation
- Honour Based Violence
- Trafficking and Exploitation
- Sexual Violence (including rape)
- Stalking and Sexual Harassment

To accompany the strategy will be a **multi agency action plan** to ensure that the locally driven strategy directly tackles all forms of violence against the person. The Governance of the strategy and the action

plan is through the Safer Harrow Management Group which monitors performance and delivery. There are also strategic links with the Harrow Local Safeguarding Children's Board, the Harrow Adult Safeguarding Board and engagement with key practitioners and the community.

The Action Plan is broken into three categories: **Prevention, Provision** and **Protection** with the ultimate aim of tackling all forms of violence against the person. This involves commissioning services, monitoring delivery and performance, ensuring effective partnership working, specialist training and end-to-end support for victims.

To ensure the strategy and action plan are delivered effectively, support is in place for:

- Training frontline professionals, managers and councillors;
- victims of domestic and sexual violence
- Local campaigns and media
- Sanctuary Scheme
- Referrals to perpetrator schemes
- Consultation with survivors of interpersonal violence and the professionals that work with them
- Refuge places
- A Community led Domestic Abuse Forum
- Monthly Multi Agency Risk Assessment Conference meetings
- Links to the West London Rape Crisis Centre

The ending of specific grants and restrictions on the extent of LAA Reward Grant has resulted in a large proportion of the voluntary sector capacity for supporting survivors of Domestic Violence coming to an end by March 2011.

Age Equality

The Equality Act 2010 replaces the Employment Equality (Age) Regulations 2006 and protects people of all ages. However, different treatment because of

age is not unlawful direct or indirect discrimination if you can justify it, i.e. if you can demonstrate that it is a proportionate means of meeting a legitimate aim.

Lawful discrimination

At the moment it is not unlawful to discriminate on the grounds of age if:

- there is an **objective justification** for treating people differently – for example, it might be necessary to fix a maximum age for the recruitment or promotion of employees (this maximum age might reflect the training requirements of the post or the need for a reasonable period of employment before retirement);
- where a person is older than, or within six months of, the employer's normal retirement age, or 65 if the employer doesn't have one, there is a specific exemption allowing employers to refuse to recruit that person;
- the discrimination is covered by one of the **exceptions or exemptions** given in the regulations – for example pay related to the National Minimum Wage.
- there is a **genuine occupational requirement** (GOR) that a person must be of a certain age – for example, if you are producing a play which has parts for older or younger characters.

We recognise the importance of recruiting and retaining valuable employees and will not use age or age-related criteria in recruitment and selection. As part of the job application process, candidates can voluntarily complete an Equality Monitoring form to enable the Council to analyse recruitment and produce annual reports.

Religion or Belief

The Employment Equality (Religion or Belief) Regulations 2003 have been replaced by the Equality Act 2010 and as before it is illegal to discriminate against someone directly or indirectly on the grounds of religion and belief in

employment, vocational training, promotion and working conditions.

In the Act, religion includes any religion. It also includes lack of religion, in other words employees and job seekers are protected if they do not follow a certain religion or have no religion at all. Additionally a religion must have a clear structure and belief system. Belief means any religious or philosophical belief or lack of such belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour. Denominations or sects within a religion can be a protected religion or religious belief. Humanism is a protected philosophical belief but political beliefs are not covered.

Religion or belief discrimination can occur even where both the discriminator and recipient are of the same religion or belief.

Sexual Orientation

The Equality Act 2010 replaces both the T Employment Equality (Sexual Orientation) Regulations 2003 which make it unlawful to discriminate against someone directly or indirectly on the grounds of sexual orientation and Equality Act (Sexual Orientation) Regulations 2007 make it unlawful to discriminate in the provision of goods, facilities and services on the grounds of sexual orientation. The Act extends this protection to include victimisation, harassment and harassment by association.

Our progress and achievements

Since the implementation of our first SES, we have made some real progress with regards to promoting equality of opportunity, tackling discrimination, reducing inequality and promoting community cohesion. A comprehensive list of our achievements can be found in Appendix 4 but some of our key achievements are listed below:

- Carried out a comprehensive review assessing all our functions, services and policies for relevance to the Equality

Duties but also extending this to age, religion or belief and sexual orientation

- Maintained our commitment to Job Centre Plus' Positive about Disabled People incentive
- Continued our partnership work with DisabledGo to produce a detailed online access guide to the area. The guide to Harrow covers 1041 venues and was launched after an extensive and unprecedented research exercise in 2006.
- Delivered two half day sessions on Diversity and Cultural Awareness training through a theatrical company looking at potential barriers and discrimination in frontline services which was attended by 48 employees.
- Continued to support Harrow Council Black Workers Group, Staff LGBT Forum, Disabled Workers Group and the Staff Carers Forum which are self organised groups and meet on a bi-monthly basis. The role of the groups is to provide a forum for employees to discuss issues and concerns, with a view to communicating them to the Council in order to inform, influence and effect change.
- Women's badminton sessions are now held at the Harrow Leisure Centre to encourage participation of more women from an Black Asian Minority Ethnic background
- Celebrated International Women's Day in March 2010
- In partnership with the Lesbian Gay Bisexual Transgender Forum, Metropolitan Police, Harrow Hate Crime Forum, Harrow Police and Community Consultative Group and North West Lesbian Gay Bisexual Transgender Forum held a film showing for employees, elected members, partners and members of the public to mark International Day Against Homophobia (IDAHO)
- In celebration of Harrow's multicultural community, the council in partnership

with the Harrow Interfaith Council launched an Open Faith Weekend in November 2009. Participating places of worship opened their doors to the wider public to promote a better understanding of their faith. As a first event of its kind, 15 places of worship participated. This followed a successful evening event with representatives from nine faiths in an open discussion question and answer forum with attendance of nearly 100.

- Secured funding to support workless parents and those on household incomes below £20K per annum into sustainable employment.
- We were the first London Local Authority to launch a dedicated youth website to empower young people to access local services.
- Introduced Saturday burials at the Carpenders Park cemetery to accommodate the particular requirements of certain faith groups (particularly Muslims) for burial at the earliest opportunity following death.
- Provided cash flow support to Healthy Living Centre, provides work placements opportunities to residents with learning disabilities
- Funded workshops for voluntary sector groups on support available to the communities they represent during the recession
- Worked with various voluntary organisations to improve benefit take up amongst older people. Between Jan and Dec 2009 this included reviewing the benefits eligibility of 2872 individuals resulting in a £4.4m in additional benefit take up.
- Delivered Learning Disability Awareness Training for all employees in Access Harrow
- Delivered a Management Development Foundation programme for middle managers – 40% of those who attended were BAME

- Xcite – contracts with MIND, Harrow Association of Disabled People (HAD), HASVO to provide employment support disabled people, and members of Somali community. Employment support to residents in social housing
- Adults and Housing produced an older people’s handbook, which provides information about services, health and well being to promote independence, choice and flexibility.
- Funded Harrow Citizen Advice Bureau to establish an advice kiosk in Wealdstone
- Funded Harrow in Business to provide training to unemployed residents wishing to set up their own businesses
- Delivery of Future Job Fund to provide work for long term unemployed young people into work
- Delivered two half day sessions on Diversity and Cultural Awareness training through a theatrical company looking at potential barriers and discrimination in frontline services which was attended by 48 members of employees
- Springboard Development programme for women
- Carried out a comprehensive review of assessing all the Council’s functions, services and policies for relevance to the equality duties to develop an EqIA programme for each directorate
- Adopted Accessible Homes Supplementary Planning Document requiring new residential development to be built to lifetime and wheelchair homes standard.
- Developed a partnership with Coram to provide high quality placements for Children Looked After (CLA)
- Developed a strong corporate parenting planning to provide high level strategic support to CLA
- Developed a teenage placement commissioning strategy to target our most vulnerable young people to provide support and stability.
- Provide respite care for carers of children with disabilities.
- Successfully implemented “Aiming high” for disabled children and offering increased respite care.
- Developed a successful Children’s Centre programme to cater for the needs of the diverse community in each the area.
- Developed and support a strong active Youth parliament.

Implementing our Single Equalities Scheme

We will deliver our Scheme through implementing the action plan and continuing to mainstream equalities throughout the organisation and the borough.

Roles, structures and responsibilities

Elected Members and employees at all levels are responsible for ensuring they work together to identify and remove barriers to equality and behave and work in accordance to our Equality Policy.

The **Chief Executive** is responsible for leading the organisation in its commitment to achieve equality.

Directors, Chief Officers and Heads of Services are responsible for ensuring that all employees, customers, contractors and suppliers are aware of the policy and that this scheme is implemented in all parts of the management and departmental structures. Practices within each directorate and service should be monitored and reviewed to ensure equality and diversity are promoted in all their forms and there are no discriminatory practices which affect employees or the services they provide.

Managers and supervisors are responsible for delivering good practice in their services and amongst their employees, providing support and direction to achieve equality.

We have a Councillor Champion for equalities (Cllr Graham Henson) who is a member of the Council's Executive and an Officer Champion (Corporate Director of Adults and Housing, Paul Najsarek) who is also the Chair of the Corporate Equalities Group.

The corporate Policy Officer for Equalities and Diversity develops and oversees this corporate programme of work and manages our overall response to the

equality agenda. The Corporate Equality Officer is based in the Policy and Partnerships team in the Chief Executives Directorate.

Supporting structures have been established to ensure that we are able to deliver on our equality and diversity improvement priorities while ensuring ownership at all levels.

Corporate Equalities Group (CEG): is chaired by the Officer Champion for equalities and is made up of a representative from each directorate's senior management team, employee support groups, external community groups and the unions. The group is responsible for taking a strategic overview of the Council's obligations to and opportunities for promoting equalities, embedding and mainstreaming equalities and diversity across the organisation.

The group also receives reports on corporate equality performance and such as the workforce monitoring report recommendations to take to the Corporate Strategy Board (CSB) for approval.

Departmental Equalities Task Groups (DETGs): are chaired by each directorate's representative at the CEG and consists of senior representatives from each service with the directorate. DETGs are responsible for supporting the CEG and identifying and implementing responses arising within their directorates.

Harrow Equalities Centre (HEC)

HEC is a voluntary organisation which aims to work with all sectors in promoting, implementing and monitoring Single Equality Schemes. HEC will provide a much needed independent overview and scrutiny of the implementation stages and effectiveness of the Single Equality Scheme Action Plans"

Reporting on the Progress of the Scheme

This Scheme sets out our approach to equality and diversity and key priorities for the next three years with a corporate Action Plan. The Action Plan includes specific actions we will take in order to achieve the cross cutting objectives of the SES. This was developed following a corporate assessment against the 'Excellent' criteria of the EFLG and includes proposed actions to achieve the 'Excellent' accreditation by March 2012 as well as actions put forward from each directorate. The plan shows our strategic actions, responsibility for the actions, lead officers and directorates and the timescale for delivery.

Directorates and Services are responsible for helping deliver the Action Plan. We will report each year on the progress of our outcomes and priorities set out within our Scheme. Each directorate will produce a six monthly progress report for the CEG highlighting progress made as well as any challenges and the Policy Officer for Equalities and Diversity will be responsible for producing an annual overview of our progress for the CEG and the Overview and Scrutiny Committee.

This will provide an opportunity for key decision makers and interested stakeholders to challenge progress, support delivery and identify and address any issues that affect the whole organisation.

The Scheme will be reviewed at least every three years and a revised Scheme developed following the review. We will also review the Scheme as and when necessary due to legislative changes.

Appendix 4 shows a list of regular monitoring we will carry out, report and publish to ensure implementation of our SES

Single Equalities Scheme Action Plan January 2010 – December 2013

Develop a Modern and Diverse workforce to reflect the community we serve										
Action	Directorate / Lead	Target Date	How will we measure our success	Action relates to:						
				Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic
Produce the Annual Equalities in Employment Report (retrospective), which will also report the previous year's actions, for the Employee Consultative Forum and publish on the Council website. The report will be used to identify any positive patterns or trends of concern;	HRD	December 2010 and thereafter annually by same month	Annual report produced and presented to Employee Consultative Forum (ECF)	X	X	X	X	X	X	
Monitor social identity of agency workers to include in the Annual Equalities in Employment report	HRD	Jan 2011	Monitoring undertaken and included in report	X	X	X	X	X	X	
Ensure all middle managers have undertaken the online EqIA training	Equalities Officer ETG Chairs	March 2011	All middle managers completed training	X	X	X	X	X	X	
Deliver EqIA training to Cabinet members to develop their understanding on equality implications in decision making	Equalities Officer Members development	March 2011	Cabinet Members trained on EqIAs	X	X	X	X	X	X	
To improve representation of minority staff (in particular, BAME staff) in senior positions, develop and implement a programme to support minority staff into senior positions	HRD	March 2011	Programme implemented				X			

Review partnerships with differing equalities organisations and adopt a holistic approach to ensure these promote and provide support for the different social identities of the workforce	Equalities Officer HRD	March 2011	Holistic approach to partnerships adopted for 2011/12	X	X	X	X	X	X	X
Review current equalities and diversity training and e-learning and develop a holistic approach in meeting directorate and customer needs	Equalities Officer HRD	March 2011	Coherent training offering in place for 2011/12	X	X	X	X	X	X	X
In order to increase awareness of our Equality and Diversity policies, Public Equality Duties, equalities legislation and their implications on the council, produce a 'Diversity at Work' handbook and disseminate to all employees and elected members,	Equalities Officer	April 2011	Handbook produced and disseminated	X	X	X	X	X	X	X
Ensure Equality & Diversity training is provided for all Income Management employees	Housing Strategy	June 2011	Training delivered	X	X	X	X	X	X	X
To ensure workforce reflects community we serve and build a truly diverse workforce, extend Equality Monitoring to include religion or belief and sexual orientation into recruitment processes	HRD	December 2011 (subject to funding availability)	Workforce review completed	X	X	X	X	X	X	X
Update the social identity of workforce to include religion or belief and sexual orientation	HRD	December 2011 (subject to funding availability)	Workforce review completed				X	X	X	X
To increase knowledge and awareness, develop and implement a suite of Equality and Diversity e-learning training for elected members as part of Learning Pool	HRD Equalities Officer	Dec 2011	Equality and Diversity suite developed and incorporated into Learning Pool	X	X	X	X	X	X	X
Ensure all elected members are aware of and are able to access the online EqIA training' by Dec 2011.	HRD Equalities Officer	Dec 2011	All members registered for the EqIA E-learning	X	X	X	X	X	X	X
Undertake a remote working pilot	Legal & Governance	Dec 2011	Pilot undertaken and	X	X	X	X	X	X	X

designed to trial more flexible and modern working practices.	Services	monitored for take up							
To improve diversity of workforce across the council, implement the Action Plan within the 'Strategy for People' for 2010-2012	HRD	Dec 2012	Strategy for People implemented and targets reviewed	X	X	X	X	X	X
Deliver safeguarding Multi Agency training	Adults	Dec 2013	Increase in numbers of staff who know how to report safeguarding incidents	X	X	X	X	X	X
Develop and commence implementation of Council wide Flexible and Mobile working strategy	Head of Business Management, Place Shaping	Dec 2013	Strategy developed and implemented	X	X	X	X	X	X

Improve the data the council has on its residents and service users so all decisions can be taken and services developed in light of strong intelligence

Action	Directorate / Lead	Target Date	How will we measure our success	Action relates to:						
				Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic
Monitor concessionary travel pilot	Corporate Finance	Jan 2011	Monitoring completed	X	X	X	X	X	X	X
Develop a corporate policy and guidance document on Equality Monitoring for employees and service users.	Equalities Officer – Policy & Partnerships	March 2011	Document produced, published and disseminated	X	X	X	X	X	X	X
Publicise and share Harrow Vitality Reports amongst directorates and partners to assist in service development and agreeing equality objectives	Research and Information	June 2011	Reported publicised and shared within the council and amongst partners	X	X	X	X	X	X	X

Refresh the Joint Strategic Needs Assessment (JSNA) and produce report to inform service development and planning.	Adults	June 2011	JSA refreshed and reports produced and disseminated	X	X	X	X	X	X	X
Establish a central point on the council's website to share ward profiles and demographic data with partners to utilise when developing policies, services and agreeing objectives, through the development of a local intelligence database	Corporate Performance	Dec 2011	Central data sharing point established and publicised	X	X	X	X	X	X	X
Develop a profile of housing tenants to develop and improve services around their needs	Housing Strategy	March 2011	Profile established on all six diversity strands	X	X	X	X	X	X	X
Review and update Harrow Vitality Report	Research and Information	March 2012	Vitality Report reviewed, published and disseminated	X	X	X	X	X	X	X

Ensure that residents, service users and employees can influence decisions through effective communication and engagement

Action	Directorate / Lead	Target Date	How will we measure our success	Action relates to:						
				Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic
Establish an overarching Equalities body for the borough	Community and Environment	Jan 2011	Equalities body established	X	X	X	X	X	X	X
Introduce quarterly newsletter 'Equality Matters' for employees and elected	Equalities Officer Chief Executives	Jan 2011	Implementation of newsletter	X	X	X	X	X	X	X

develop a corporate policy and guidance.																				
Set up a network (recruit 2000) of Neighbourhood Champions across the borough	Community and Environment	March 2012	2000 Neighbourhood Champions recruited and trained	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Increase the number of people who say they receive fair treatment from local services	Chairs of ETGs	March 2012	Previously measured through Place Survey, exploring alternative measures.																	
Implement corporate programme of EqIA's	Lead Officers (Note: DETGs have an important role to play in making sure impact assessments are carried out across their department)	Dec 2013	Programme of EqIA's completed, signed off and published	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Reduce inequalities through corporate commitment and partnership working

Action	Directorate / Lead	Target Date	How will we measure our success	Action relates to:								
				Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic		
Review Service Level Agreements (SLA's) to ensure services are delivered in line with corporate priorities and services delivered help to reduce inequalities within the borough	Adults	Jan 2011	Review undertaken and SLA's demonstrate action to reduce inequalities	X	X	X	X	X	X	X	X	X
Work with the Police to acquire and distribute smartwater property marking solution to 40% of the boroughs households to prevent burglary and other	Community and Environment	March 2011	At least 40% of households receive smartwater property markers	X	X	X	X	X	X	X	X	X

Continue to work with our User Lead Organisation (ULO) (Harrow Association of Disabled People - HAD) to assist in the development and delivery of our Universal Information Advice Strategy	Adults	Ongoing	Universal Information Advice Strategy developed	X	X	X	X	X	X
Work in partnership with the Domestic Violence Forum and the Strategic Board to reduce domestic violence experienced by people in Harrow	Policy and Partnerships	Ongoing	Number of repeat cases seen by Multi Agency Referral and Assess Conference (MARAC) remain below 25% NI32				X		

Promote diversity and community cohesion both within the council and the borough

Action	Directorate / Lead	Target Date	How will we measure our success	Action relates to:								
				Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic		
Supporting the Mayor's theme of office for 2010/11 which is celebrating cultural diversity . This involves positive engagement with a broad range of community, faith, and other interest groups when organising the Mayor's schedule of engagements.	Legal and Governance Services	April 2010 to April 2011.	Programme of events delivered to support the Mayoral Theme of Office	X	X	X	X	X	X	X		
Review Corporate Events Calendar to ensure the events reflect all diversity strands	Community and Environment	March 2011	Calendar reviewed and reflects all diversity strands	X	X	X	X	X	X			

Appendix 1 – Equalities Act 2010

Background

On 8 April 2010 the Equality Bill received Royal Assent and became the Equality Act 2010. The Equality Act contains a range of new rights, powers and obligations to help the drive towards equality. The Act aims to strengthen and simplify the equality law that is already in place, such as the Race Relations Act and the Disability Discrimination Act. The main aim of the Act is:

- to strengthen and extend the law to support progress on equality;
- to distil and streamline the different strands of equalities legislation into a single Act.

Elements of the Act will begin to take effect from October this year to allow people and organisations that are affected by the new laws to prepare for them. Key public sector duties will come in to effect from April 2011.

Provisions coming into force on 1 October 2010

- The basic framework of protection against direct and indirect discrimination, harassment and victimisation in services and public functions; premises; work; education; associations, and transport;
- Changing the definition of gender reassignment, by removing the requirement for medical supervision;
- Levelling up protection for people discriminated against because they are perceived to have, or are associated with someone who has, a protected characteristic, so providing new protection for people like carers;
- Clearer protection for breastfeeding mothers;
- Applying the European definition of indirect discrimination to all protected characteristics;

- Extending protection from indirect discrimination to disability;
- Introducing a new concept of “discrimination arising from disability”, to replace protection under previous legislation lost as a result of a legal judgment;
- Applying the detriment model to victimisation protection (aligning with the approach in employment law);
- Harmonising the thresholds for the duty to make reasonable adjustments for disabled people;
- Extending protection from 3rd party harassment to all protected characteristics;
- Making it more difficult for disabled people to be unfairly screened out when applying for jobs, by restricting the circumstances in which employers can ask job applicants questions about disability or health;
- Allowing hypothetical comparators for direct gender pay discrimination;
- Making pay secrecy clauses unenforceable;
- Extending protection in private clubs to sex, religion or belief, pregnancy and maternity, and gender reassignment;
- Introducing new powers for employment tribunals to make recommendations which benefit the wider workforce;
- Harmonising provisions allowing voluntary positive action.

Provisions the Government is still considering

- the Socio-economic Duty on public authorities;
- dual discrimination;
- duty to make reasonable adjustments to common parts of leasehold and

common hold premises and common parts in Scotland;

- gender pay gap information;
- provisions relating to auxiliary aids in schools;
- diversity reporting by political parties;
- positive action in recruitment and promotion;
- provisions about taxi accessibility;
- prohibition on age discrimination in services and public functions;
- family property;
- civil partnerships on religious premises.

Who the Equality Act 2010 affects

The Act applies to all organisations and bodies who provide a service to the public or a section of the public (service providers). It also applies to anyone selling goods or providing services whether or not a charge is made for them.

Who is protected?

The Act protects people from discrimination on the basis of characteristics (previously called grounds) which are:

- Age
- Disability (definition changed);
- Gender Reassignment (definition changed);
- Marriage and Civil Partnership
- Pregnancy and Maternity;
- Race – includes ethnic or national origins, colour and nationality;
- Religion or Belief;
- Sex;
- Sexual Orientation.

Age

The Act protects people of all ages. However, different treatment because of age is not unlawful direct or indirect discrimination if you can justify it, i.e. if you can demonstrate that it is a proportionate means of meeting a legitimate aim.

Disability (new definition and changes)

The Act has made it easier for a person to show that they are disabled and protected by disability discrimination. Under the Act, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities, which would include things like using a telephone, reading a book or using public transport.

As before the Act places a duty on employers to make reasonable adjustments for staff to overcome disadvantage resulting from impairment; for example, by providing assistive technologies to help visually impaired staff use computers effectively.

The Act includes a new protection from discrimination arising from disability. This means that it is discrimination to treat a disabled person unfavourably because of something connected with their disability (e.g. a tendency to make spelling mistakes arising from dyslexia). This type of discrimination is unlawful where the employer or the person acting for the employer knows or could reasonably be expected to know that the person has a disability. This type of discrimination is only justifiable if an employer can show that it is a proportionate means of achieving a legitimate aim.

Additionally, indirect discrimination now covers disabled people. Unless it can be justified, a job applicant or employee could claim that a particular rule or requirement disadvantages people with a disability.

Gender Reassignment (new definition)

The Act also protects transsexual people. It revises the definition of 'gender reassignment' to make it clear that a Trans person does not have to be under medical supervision to be protected from discrimination and harassment, so if a woman decides to live permanently as a man but does not undergo any medical procedures would be covered. Transgender people such as cross dressers, who are not transsexual because they do not intend to

live permanently in a gender opposite to their birth sex, are not protected by the Act.

It is discrimination to treat transsexual people less favourably for being absent from work because they propose to undergo, are undergoing or have undergone gender reassignment that they would be treated if they were absent because they were ill or injured. Medical procedures for gender reassignment such as hormone treatment should not be treated as a 'lifestyle' choice.

Marriage and Civil Partnership (no change)

The Act protects employees who are married or in a civil partnership against discrimination. Single people are not covered.

Pregnancy and Maternity (no change)

A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and statutory maternity leave to which she is entitled. During this period, pregnancy and maternity discrimination cannot be treated as sex discrimination.

You must not take into account an employee's period of absence due to pregnancy-related illness when making a decision about her employment.

Race (no change)

For the purposes of the Act 'race' includes colour, nationality and ethnic or national origins. A racial group could be made of two or more different racial groups (e.g. Black Britons).

Religion or Belief (no change)

In the Equality Act, religion includes any religion. It also includes lack of religion, in other words employees and job seekers are protected if they do not follow a certain religion or have no religion at all. Additionally a religion must have a clear structure and belief system. Belief means any religious or philosophical belief or lack of such belief. To be protected, a belief must satisfy various criteria, including that it

is a weighty and substantial aspect of human life and behaviour. Denominations or sects within a religion can be a protected religion or religious belief. Humanism is a protected philosophical belief but political beliefs are not covered.

Religion or belief discrimination can occur even were both the discriminator and recipient are of the same religion or belief.

Sex (no change)

Both men and women are protected under the Act.

The Equality Act 2010 makes clear that mothers can breastfeed their children without being asked to leave places like cafes and shops, and ensures that schools cannot discriminate against pupils who are pregnant or new mothers.

Sexual Orientation

The Act protects bisexual, gay, heterosexual and lesbian people.

As a public sector organisation our responsibilities remain largely the same but there are some differences that you need to be aware of which are summarised in the **table** on page 6.

Key

Covered in existing legislation – no change	No Change
Covered in existing legislation – but some changes	Changes
Not covered in existing legislation – now covered	New
Not covered in existing legislation – still not covered	No Protection

Types of discrimination	Age	Disability	Gender Reassignment	Race	Religion or Belief	Sex	Sexual Orientation	Marriage & Civil Partnership	Pregnancy & Maternity
DIRECT DISCRIMINATION Someone is treated less favourably than another person because of a protected characteristic (PC)	No Change	No Change	No Change	No Change	No Change	No Change	No Change	No Change	No Change
ASSOCIATIVE DISCRIMINATION Direct discrimination against someone because they associate with someone who possessed a PC	New	New	New	No Change	No Change	New	No Change	No Protection	No Protection
DISCRIMINATION BY PERCEPTION Direct discrimination against someone cause others think they possess a PC	No Change	New	New	No Change	No Change	New	No Change	No Protection	No Protection
INDIRECT DISCRIMINATION occur when you have a rule or policy that applies to everyone but disadvantages a particular PC	No Change	New	New	No Change	No Change	No Change	No Change	No Change	No Protection
HARRASSMENT Employees can now complain of behaviour they find offensive even if its not directed at them	Changes	Changes	Changes	Changes	Changes	No Change	Changes	No Protection	No Protection
HARRASSMENT BY A THIRD PARTY Employees are potentially liable for harassment of their staff by people they don't employ	New	New	New	New	New	No Change	New	No Protection	No Protection
VICTIMISATION Someone is treated badly because they have made / supported a complaint or grievance under the Act	Changes	Changes	Changes	Changes	Changes	Changes	Changes	Changes	Changes

Appendix 2 – Index of Multiple Deprivation (Analysis)

In all of the IMD results, the most deprived ranking is 1 and the least deprived in 354. Where Harrow's ranking has moved closer to 1 over time, it means that our deprivation has increased relative to the rest of England and Wales and where the ranking has moved closer to 354, it means that our relative deprivation has declined.

Income deprivation – Harrow ranks 108th for income deprivation in England out of 354 districts compared to 142nd in 2004. Within London, Harrow is ranked 21st out of the 33 London Boroughs and 10th out of 19 Outer London Boroughs. Twenty of Harrow's 137 LSOAs (spread across 13 wards) are in England's most deprived 20%, seven of these being amongst the country's m10% of SOAs. Sixteen of Harrow's LSOAs (mostly to the west) are in the country's 20% least deprived.

- Income affecting children – Harrow ranks 65th in 2007 compared to a ranking of 137th in 2004. Within London, Harrow is ranked 23rd out of 33 and 11th out of 19, 24 of Harrow's 137 SOAs are in England's most deprived 20% and the wards of Marlborough, Roxbourne and Hatch each have one SOA in the top 5% nationally deprived SOAs.
- Income affecting older people – Harrow ranks 98th out of 354 districts in England, compared to 94th in 2004. Within London, Harrow is ranked 20th out of 33 boroughs and 9th out of 19 Outer London Boroughs where 1st is most deprived.

11% of households in Harrow (about 9,000) have annual gross incomes under £15,000 a year – below both the figures for London (13%) and Great Britain (17%).

Employment Deprivation – Harrow ranks 199th out of 354 districts in England, compared to 236th in 2004. Within London, Harrow is ranked 22nd out of 33 London Boroughs and 11th out of 19 Outer London Boroughs.

Health and Disability Deprivation – Harrow is ranked 242nd out of 354 districts in England. Our London ranking is 24th out of 33 and 12th out of 19th for the Outer London Boroughs.

Education, Skills and Training Deprivation – Harrow is one of the best of all districts for low levels of educational deprivation, ranking 247th out of 354 districts in England, 31st out of 33 for London Boroughs and 17th out of 19th for Outer London Boroughs.

Living Environment Deprivation – Harrow is ranked 141st out of 354 districts in England, 30th out of 33 London Boroughs and 16th out of 19th Outer London Boroughs.

Barriers to Housing and Services Deprivation – Harrow ranks 94th out of 354 districts nationally compared to 156th in 2004. Within London, Harrow is ranked 25th out of 33 and 12th out of 19 Outer London Boroughs.

Crime deprivation - Harrow is ranked 155th out of 354 districts in England for crime deprivation in 2007, compared to a ranking of 139th in 2004. Within London, Harrow is ranked 28th out of 33 London Boroughs and 15th out of the 19 Outer London Boroughs where 1st is the most deprived.

Appendix 3 – Corporate EqIA Programme 2011-2013

An Equality Impact Assessment (EIA) is an assessment that allows us to make sure we do not discriminate and that, where possible, we promote equality. We carry out equality impact assessments to make sure our policies and services are fair.

The timetable below sets out:

- the policies, services or functions that are most relevant to our duty to promote equality;
- the proposed dates when the EqIAs will be completed; and
- the lead officers responsible for completing the EqIAs.

The timetable also includes directorate based projects within our Better Deal for Residents Programme (*in italics*) and the cross cutting projects separately above.

Better Deal for Residents Cross Cutting Projects

Year	Directorate	Function, Policy, Service or Project	Officer responsible for EqIA	When will the EqIA be completed
1	Cross Cutting	<i>Customer Contact / Assess & Decide</i>	<i>Jonathan Milbourn</i>	<i>Jan 2011</i>
	Cross Cutting	<i>Mobile & Flexible Working</i>	<i>Andy Parsons</i>	<i>Jan 2011</i>
	Cross Cutting	<i>Business Support (General Admin)</i>	<i>Andy Parsons</i>	<i>Feb 2011</i>
	Cross Cutting	<i>Corporate Services</i>	<i>David Ward</i>	<i>Mar 2011</i>

Year	Directorate	Function, Policy, Service or Project	Officer responsible for EqIA	When will the EqIA be completed
1	<i>Community and Environment</i>	<i>Public Realm</i>	<i>Jerry Hickman</i>	<i>Nov 2010</i>
	<i>Community and Environment</i>	<i>Libraries Transformation</i>	<i>John Pennells</i>	<i>Nov 2010</i>

Year	Directorate	Function, Policy, Service or Project	Officer responsible for EqIA	When will the EqIA be completed
1	Children's / Adults & Housing	Special Needs Transport II	Roger Rickman	Dec 2010
	Adults & Housing	WLA Joint Procurement	Nick Davies	Dec 2010
	Children's	Future Operating Model for School Improvement	Adrian Parker	Dec 2010
	Children's	Integrated Targeted Services	Jo Hawley	Jan 2011
	Chief Execs	Rewards and Payments suite	Lesley Clarke, Organisational Development Manager	Jan 2011
	Corporate Finance	Concessionary Travel	Fern Silverio	Jan 2011
	Corporate Finance	Insurance Review	David Ward	Jan 2011
	Corporate Finance	Procurement Transformation	Varsha Dadlani	Jan 2011
	Children's Services	Local safeguarding children board learning and development programme	Betty Lynch	Jan 2011
	Chief Execs	Sustainable Community Strategy	Trina Thompson / Mike Howes	Jan 2011
	L&GS	Citizenship Ceremonies	Geraldine Sparrow	Jan 2011
	Corporate Finance	Access Harrow	Fern Silverio / Jonathan Milbourn	Jan 2011
	Corporate Finance	Home Visits	Fern Silverio / Griselda Colvin	Jan 2011
	Adults & Housing	Introduction of new controlled parking arrangements on housing estates	Beverley Bonnefoy	Jan 2011
	Children's Services	Provision	Wendy Beeton	Feb 2011
	Place Shaping	LDF – Core Strategy	Matthew Paterson	Feb 2011
	Adults & Housing	Admission Policy	Ebrahim Harandy	Feb 2011
	Corporate Finance	Benefits Communications (Web pages, web forms, Literature, Letters, notifications)	Fern Silverio / Lynn Allaker, Fabio Esposito / Stewart Brown	Feb 2011
	Children's Services	Crime Prevention	Richard Segalov	Feb 2011
	Chief Execs	Resourcing – Agency Staff	Jon Turner	Mar 2011
Chief Execs	Chief Execs Dept Restructuring	Alex Dewsnap	Mar 2011	

Year	Directorate	Function, Policy, Service or Project	Officer responsible for EqIA	When will the EqIA be completed
1	Place Shaping	Major Projects: Public Realm and Access Strategy	Phil Greenwood	March 2011
	Chief Execs	Anti Social Behaviour Strategy	Mike Howes	March 2011
	Chief Execs	Community Involvement Strategy	Desiree Mahoney / Mike Howes	March 2011
	Adults & Housing	<i>Changing Tenant Behaviour</i>	<i>Maggie Challoner</i>	Mar 2011
	Adults & Housing	<i>Preventative Services</i>	<i>Bridget Bergin</i>	Mar 2011
	Adults & Housing	<i>Contract Management</i>	<i>Nick Davies</i>	Mar 2011
	Corporate Finance	Appeals (Benefits, Parking)	Fern Silverio / Lynn Allaker, Fabio Esposito / Stewart Brown	Mar 2011
	Chief Execs	Managing Change suite	Paul R Turner, Senior HRD Business Partner	March 2011
	Adults & Housing	<i>Re-ablement</i>	<i>Bridget Bergin</i>	Mar 2011
	Adults & Housing	Prevention strategy for adult social care	Bridget Bergin	March 2011
	Adults & Housing	<i>Social Care Realignment</i>	<i>Bernie Flaherty</i>	Mar 2011
	Children's Services	List of children at risk of underachieving	Betty Lynch	March 2011
	Children's	<i>Young People – Anti-Social Behaviour</i>	<i>Richard Segalov</i>	Mar 2011
	Adults & Housing	Carers Strategy	Amanda Dade	March 2011
	Chief Execs	Compact	Mike Howes	April 2011
	Children's Services	Children and young people's plan	Betty Lynch	April 2011
	Legal & Governance Services	Service delivery and opening times	Geraldine Sparrow	April 2011
	Legal & Governance Services	Members Development	Pauline Ferris	April 2011
	Corporate Finance	Overpayments, collections and recovery (HB, C Tax, Business Rates PCN)	Fern Silverio, Lynn Allaker, Stewart Brown	Apr 2011
	Corporate Finance	<i>Health & Safety</i>	<i>David Ward</i>	May 2011
Corporate Finance	<i>Management Restructure</i>	<i>Myfanwy Barrett</i>	May 2011	

Year	Directorate	Function, Policy, Service or Project	Officer responsible for EqIA	When will the EqIA be completed
1	Chief Execs	Recruitment and Retention suite	Munira Kachwala	May 2011
	Corporate Finance	Benefit Take Up and Customer Access	Fern Silverio/Fabio Esposito	May 2011
	Corporate Finance	Discount and Exemption Reviews	Lynn Allaker / Fern Silverio	May 2011
	Place Shaping	Major Projects: Station Road Two Way Working	Phil Greenwood	June 2011
	Corporate Finance	Transition of Student Finance	Lynn Allaker	Jun 2011
	Legal & Governance Services	Taking Notices of marriages/ conducting marriages/ civil partnerships	Geraldine Sparrow	June 2011
	Adults & Housing	Catering & Meals on Wheels	M Leonard/ Bridget Bergin	June 2011
	Chief Execs	Substance misuse policies	Mike Howes	June 2011
	Chief Execs	Consultation Strategy	Desiree Mahoney	July 2011
	Chief Execs	Workforce Planning Suite	Sangeeta Jerath, HRD Business Partner	July 2011
	Children's Services	Narrowing the gap initiative	Betty Lynch	July 2011
	Adults & Housing	Contributions Framework	Donna Edwards	Aug 2011
	L&GS / Community and Environment	Cemeteries services / administration	Geraldine Sparrow	Aug 2011
	Corporate Finance	Inspection Visits	Lynn Allaker	Sep 2011
	Corporate Finance	Discretionary Housing Payments	Griselda Colvin/Fern Silverio	Sep 2011
	Place Shaping	Major Projects: Stanmore Car Park Planning Brief	Phil Greenwood	Sept 2011
	Legal & Governance Services	Electoral Services	Pauline Ferris	Oct 2011
	Chief Execs	Performance Standards Suite (including IPAD)	Marion Afoakwa	Oct 2011
	Children's Services	Needs Assessment	Betty Lynch	Nov 2011
	Chief Execs	Partnership Governance	Mike Howes	Dec 2011
Place Shaping	Building Control	Gary Peter	Dec 2011	

Year	Directorate	Function, Policy, Service or Project	Officer responsible for EqIA	When will the EqIA be completed
1	Place Shaping	Planning Policy	Matthew Paterson	Dec 2011
	Place Shaping	Planning Enforcement	Beverley Kuchar	Dec 2011
	Place Shaping	Design and Conservation	Beverley Kuchar	Dec 2011
	Place Shaping	Economic Development Strategy – 3 Year Action Plan 2010-2013	Mark Billington	Dec 2011
	Place Shaping	Xcite for Parents (Project)	Mark Billington	Dec 2011
	Place Shaping	Future Job Fund (Project)	Mark Billington	Dec 2011
	Place Shaping	Local Economic Assessment (Project /procedure)	Mark Billington	Dec 2011
	Place Shaping	Vitality Report	Mark Billington	Dec 2011
	Community and Environment	Fuel Poverty Strategy	Andrew Baker	Dec 2011
	Community and Environment	Asset Management Plan	Eddie Collier	Dec 2011
	Community and Environment	Local Implementation Plan	Anne Fine	Dec 2011
	<i>Community and Environment</i>	<i>Cultural Strategy</i>	<i>Jo Saunders</i>	<i>Dec 2011</i>
	Community and Environment	Licensing Policy	Finlay Flett	Dec 2011
	Community and Environment	Food Safety Plan	Finlay Flett	Dec 2011
	Community and Environment	Anti Social Behaviour Strategy	Finlay Flett	Dec 2011
	YEAR 2: JANUARY – DECEMBER 2012			
2	Adults & Housing	Care management manual	Sue Spurlock	Jan 2012
	Legal & Governance Services	Registering births and deaths	Geraldine Sparrow	Jan 2012
	Chief Execs	Development of People Suite	Samantha Whittick	March 2012
	Legal & Governance	Baby naming ceremonies	Geraldine Sparrow	March 2012

Year	Directorate	Function, Policy, Service or Project	Officer responsible for EqIA	When will the EqIA be completed
	Services			
	Place Shaping	Major Projects: Strategic Sites Programme	Phil Greenwood	March 2012
	Place Shaping	LDF – Harrow & Wealdstone Action Plan	Matthew Paterson	March 2012
	Place Shaping	LDF – Development Management Policies	Matthew Paterson	March 2012
	Place Shaping	LDF – Site Allocations	Matthew Paterson	March 2012
	Adults & Housing	Homelessness Strategy	Jon Dalton	April 2012
	Chief Execs	Scrutiny	Lynne Margetts	May 2012
	Legal & Governance Services	Wellbeing and Benefits suite	Paul D Turner, HRD Business Partner	June 2012
	Corporate Finance	Emergency Plan	Kan Grover	Nov 2012
YEAR 3: JANUARY – DECEMBER 2013				
3	Children's Services	Local safeguarding children board learning and development programme		Jan 2013
	Legal & Governance Services	Nationality Checking	Geraldine Sparrow	Jan 2013
	Chief Execs	Council's Performance Management Framework	Liz Defries	Jan 2013
	Chief Execs	Partnerships Performance Management Framework	Liz Defries	June 2013
	Legal & Governance Services	Providing response to local property searches	Geraldine Sparrow	Aug 2013
	Chief Execs	Annual Strategic Assessment	Mike Howes	Aug 2013
	Place Shaping	Lettings of Commercial and Agricultural property	Phil Loveland Cooper	Dec 2013
	Place Shaping	Estate Management	Phil Loveland Cooper	Dec 2013
3	Place Shaping	Letting/disposal of community properties	Phil Loveland Cooper	Dec 2013

Appendix 4 – Monitoring Reports

Regular monitoring we will carry out

*Key	Age : A	Disability : D	Gender : G		
	Race : R	Religion / Belief : RB	Sexual orientation : SO		
What we will monitor or report	* Area of equality	Who will report?	Who will it be reported to?	How often	Where will the results be published?
Equality & Diversity in employment Performance Report – performance against objectives and targets – to include Recruitment, secondments and promotion– applications, invitations to interview and offers; Employment procedures – grievances, disciplinarys, and claims of harassment and discrimination; leavers under redundancy and voluntary severance, training attendance and other information on equalities training	A, D, G, R,	Divisional Director of HRD	Employee Consultative Forum Corporate Equalities Group (CEG)	Annually	Council website and intranet
Personal Development Review and training – completion rates, needs identified, days training received	A, D, G, R,	Divisional Director of HRD	Employee Consultative Forum and CEG	Annually	Council website and intranet
Equality & Diversity Progress Annual Report – performance against objectives and targets	A, D, G, R, RB, SO	Chairs of DETGs	CEG, Equalities Officer	Quarterly	Council intranet
Equality & Diversity Progress Annual Report – performance against objectives and targets	A, D, G, R, RB, SO	Equalities Officer	CEG, CSB, Overview and Scrutiny	Annual	Council website and intranet
Progress towards equality objectives and equality impact assessments	A, D, G, R, RB, SO	Chairs of DETGs	CEG	Quarterly	Council intranet
Employee Survey	A, D, G, R,	Divisional Director of HRD	CSB, Overview and Scrutiny	Bi-annually	Council intranet

Appendix 5 – Our Progress and Achievements

Develop a Modern and Diverse workforce to reflect the community we serve	Action relates to:						
	Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic
Directorate Workforce Strategies and Action Plans were introduced in 2008.							
The Council's Workforce Strategy and Action Plan - Strategy for People 2010–2012 – was developed to address the issues identified from the Directorate Workforce Strategies as well as from the 2009 Employee Survey and the Council's Better Deal for Residents transformational programme. This Strategy for People was adopted by Cabinet in March 2010. A programme is in place to deliver this with key projects being monitored monthly through the current and next phases of the Council Improvement Programme.	X	X	X	X	X	X	X
In the summer of 2008, we took an inclusive approach to developing the Council's CREATE values. Building on the views of 1400 employees who responded to the 2008 Employee Survey, we held focus groups with Members, the Corporate Strategy Board, 150 middle managers and held a large group event involving 300 employees of different and representative social identities in order to develop the values. These were agreed by Cabinet in September 2008.							
We reinforce our CREATE values through the CREATE awards held every six months to recognise and reward employees who best demonstrate the values, the first of which is Customer 1st. The third award event was held in December 2009.							
Established a sub-group of Corporate Equalities Group to focus on equalities in employment	X	X	X	X	X	X	X
Delivered Deaf Awareness training for all team leaders, Reception employees and selected front line employees		X					
Delivered Disability Awareness training for managers, employees and elected Members		X					
Contract with Harrow Association for Disabled People to provide support to employees and managers for one day per week		X					
Registration Services: Formalised use of officially approved interpreters for ceremonies such as baby naming, weddings and civil partnerships.				X			

Democratic services: Member induction. Liaised with all directorates to organise a comprehensive induction programme for members (including the 19 new councillors) which included training on a wide variety of matters and a specific session on equality and diversity issues.	X	X	X	X	X	X	X	X	X
Electoral Services: Delivered a fair and transparent application process for polling station and count employees to work on the 2010 elections. This included attendance at compulsory training for all employees which specifically looked at access requirements including disability, language barriers etc	X	X	X	X	X	X	X	X	X
Supported the appointment process of four new independent members to Standards Committee. This involved distributing a large number of application packs via community and faith groups in Harrow to encourage applications were received from the full spectrum of the community. Care was taken to ensure members of the selection panel were representative of the community and two of the independent members subsequently elected are from ethnic minority backgrounds.				X					
Learning 4 programme offered to employees groups – 700 employees achieved NVQ's at Supervisor level and below									
CMS and DMS programmes specifically promoted to BAME employees in order to encourage greater representation at middle and senior management level				X					
Carry out annual Positive about Disabled People ('two ticks') review of Council practice with Jobcentreplus		X							
Delivered an employee benefits fair on the range of discounts, benefits and terms and conditions includes Credit Union as well as Disabled Workers Group, LGBT group, and Trade Unions	X	X	X	X	X	X	X	X	X
Continued to support the Disabled Workers Group, Black Workers Group and LGBT Group		X							
Provided training on forced marriages, female genital mutilation and child trafficking.	X	X	X	X	X	X	X	X	X
Revised our integrated workforce strategy	X	X	X	X	X	X	X	X	X
Apprenticeships (30 places) within Housing Benefits / Access Harrow	X	X	X	X	X	X	X	X	X
Promote flexible working options including job share, term-time only and compressed week working	X	X	X	X	X	X	X	X	X

<p style="text-align: center;">Improve the data the council has on its residents and service users so all decisions can be taken and services developed in light of strong intelligence</p>	Action relates to:									
	Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic			

Development of EMS (Education Management Information system) by:									
1) Setting up reports that enable Ethnic Minority Achievement Service (EMAS) to track new arrivals to schools and international new arrivals to schools. This has allowed the EMAS to tailor consultancy and support to specific schools which have a large number of new arrivals and in doing so ensure a high standard of induction and support is in place for when they arrive.					X				X
2) Setting up reports that enable us to see the number of free school meal children by year group by school. This has enabled us to monitor and support schools in their roll out of the government's Home Access Free Laptop Scheme which guarantees any child on FSM in yrs 3-9 a free laptop.								X	
3) Setting up reports that enable us to monitor the language spoken and ethnicities of each school. This has allowed us to provide additional support for example in terms of resources so that the needs of particular groups of children are met.									
4) Setting up the Traveller Service as EMS users for them to have an indicator on how many traveller children are in Harrow, which schools and year groups they are in, monitor their school history including attendance and exclusions, check siblings and identify pre-school children, liaise with colleagues in other agencies and nationally.									
Children's Centre monitoring - the local authority has implemented a tracking system to monitor activity in children's centres and analyse the characteristics of service users including age, gender, ethnicity and worklessness	X				X				X
Looked after children and carers needs analysis – a detailed study of patterns and characteristics of children coming into care and locally available foster carers to match need to care options and plan for future foster carer recruitment. This piece of work highlighted in care for teenagers and young people of mixed ethnicity which influenced the strategy of the Family Placement.	X					X			
Set up reports in schools for the analysis of data about traveller children								X	X
Produced a comprehensive needs assessment to inform commissioners and commissioning priorities	X				X			X	X
Produced Vitality Profile of the borough providing key date on deprivation, crime, economy, environment, health, housing, social care, demography enabling service planning	X				X			X	X

Ensure that residents, service users and employees can influence decisions through effective communication and engagement

	Action relates to:						
	Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic
Maximised the opportunities for all eligible members of the public to vote in the 2010 elections. A number of measures were put in place, including: thorough canvass process which resulted in 95% of households in Harrow registering to vote; providing a large number of accessible polling stations with clear location information published on the website; an extra poll clerk at every station to assist the public when voting; writing to residential care managers in Harrow to ask them to make residents aware of the voting arrangements; accommodating a delegation of Harrow young people (16 and 17 year olds) to observe at the count venue, including a personal briefing on the electoral process from the Returning Officer.	X	X	X	X	X	X	X
Undertook an Employee Survey in 2008 and 2009 monitored the views of employees and led to an action plan to address their concerns	X	X	X	X	X	X	X
Supported establishment of new Employee LGBT Forum						X	
Carried out a survey with disabled workers and their managers to understand their needs and develop an action plan for improvements		X					
Adoption of the Statement of Community Involvement, setting out the process and standards for community engagement on plan-making and planning applications	X	X	X	X	X	X	X
Consultation with private, public, voluntary and community sectors on Economic Development Action Plan 2010-2013 (not a strategy, the plan behind the strategy)	X	X	X	X	X		X
Established a youth parliament	X	X	X	X	X	X	X
Established a young persons led anti-bullying coalition.	X	X	X	X	X	X	X

Continued our partnership work with DisabledGo to produce a detailed online access guide to the area. The guide to Harrow covers 1041 venues and was launched after an extensive and unprecedented research exercise in 2006.	X					
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	Action relates to:						
	Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic
Reduce inequalities through corporate commitment and partnership working							
The Council's Challenge Panel process for service and financial planning requires an assessment of the equalities impact of all budget proposals; the "myplanbudget" hubsite signposts the EIA e-learning package and the EIA information pages on the intranet; the recommended service delivery plan templates also reference equalities.	X	X	X	X	X	X	X
Development of the Council's performance management arrangements provides a robust framework for monitoring equalities indicators, including reporting to quarterly Improvement Boards, the corporate balanced scorecard and directorate scorecards. Benchmarking arrangements include membership of a national benchmarking club and a number of service-specific benchmarking clubs.	X	X	X	X	X	X	X
Educational achievement: Pupil level analysis and target setting – data from Fischer Family Trust and other sources is used to track progress and value added for different ethnic and socio-economic groups at different stages to ensure that local education caters for all groups and that the gap between the highest achievers and other groups is narrowed (while maintaining overall improvement)	X		X	X			X
Job Brokerage scheme jointly with Regeneration Unit tackles worklessness for most disadvantaged groups	X	X	X	X	X	X	X
Xcite - Secured funding to support workless parents, and those on household incomes below £20k pa into sustainable employment	X	X	X	X	X	X	X
Launched and marketing of Credit Union to support financially excluded							X
Launched Hardship Rate Relief fund to support locally owned businesses employing residents in danger of closure							X
Delivery of Gateway Asia, supporting small and medium sized enterprises wishing to access Asian markets safeguarding jobs and helping companies grow							X
Produced a single integrated Children and Young people's plan							

Promote diversity and community cohesion both within the council and the borough

	Action relates to:						
	Age	Disability	Gender	Race	Religion or Belief	Sexual Orientation	Socio – economic
In celebration of Harrow's multicultural borough, the council in partnership with the Harrow Interfaith Council launched an Open Faith Weekend in November 2009. Participating places of worship opened their doors to the wider public to promote a better understanding of their faith. As a first event of its kind, supported by Harrow Inter Faith Council, 15 places of worship opened their doors to the Harrow Community. This followed a successful evening event with representatives from nine faiths in an open discussion question and answer forum with attendance of nearly 100.					X		
Supported the programme to mark Black History Month				X			
In partnership with the Employee LGBT Forum, Metropolitan Police, Harrow Hate Crime Forum, Harrow Police and Community Consultative Group and North West LGBT Forum held a film showing for employees, elected members, partners and members of the public to mark International Day Against Homophobia (IDAHO)						X	
Celebrated International Women's Day in March 2010							

Appendix 6 – Glossary

Term	Definition
Age Discrimination Regulations 2006	Regulations that make it illegal to treat a person less favourably in the workplace, or discriminate against them, on the basis of their age - whether young or old.
Audit Commission	An independent watchdog and auditor responsible for ensuring that public money is spent economically, efficiently and effectively, to achieve high quality local services for the public.
BAME	This term is used to describe Black, Asian and Minority Ethnic groups. Sometimes an R is added which stands for refugee.
Civil Partnership	The Civil Partnership Act creates a new legal relationship of civil partnership, which two people of the same-sex can form by signing a registration document. It also provides same-sex couples who form a civil partnership with parity of treatment in a wide range of legal matters with those opposite-sex couples who enter into a civil marriage.
Commission for Social Care Inspection (CSCI)	An independent commission set up by the government to inspect and report on care services and councils.
Community cohesion	A state of well-being, harmony and stability in a given geographical community.
Comprehensive Performance Assessment (CPA)	A framework for councils and fire and rescue authorities to review performance. It uses performance indicators, assessments of corporate capacity, audit and inspection reports, and stakeholder opinions to reach a judgement about the performance of a local body.
Disability Discrimination Act 1995	Legislation that placed a duty on public authorities to make reasonable adjustments for people with disabilities, not only as an employer but also as a service provider.
Discrimination	Discrimination is when someone is put at a disadvantage because of single or multiple characteristics.
Diversity	Diversity is recognising and valuing that individuals are unique each having their own values, beliefs, attitude, culture, racial background, sexuality, skills and life experience.
EHRC	The Equality and Human Rights Commission (EHRC) is the national body that oversees equality and diversity. It has offices in England, Wales and Scotland.
Equality	Equality means treating everyone with fairness and respect and recognising the needs of individuals.

Term	Definition
Equality Impact Assessment (EqIA)	Unwanted conduct which negatively affects the dignity of people. It may be related to age, sex, race, disability, religion, nationality or any personal characteristic of the individual, and may be persistent or an isolated incident. The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient.
Gender Reassignment	Gender reassignment is a process of medical treatment to enable transsexual people to alter their bodies to match their gender identity.
Harassment	Unwanted conduct which negatively affects the dignity of people. It may be related to age, sex, race, disability, religion, nationality or any personal characteristic of the individual, and may be persistent or an isolated incident. The key is that the actions or comments are viewed as demeaning and unacceptable to the recipient.
LGBT	Lesbian, gay bi-sexual and trans-sexual.
Macpherson report	A report by Sir William Macpherson which followed an inquiry into the Metropolitan police's investigation of the murder of black teenager Stephen Lawrence.
Prejudice	Means to pre-judge someone, knowing next to nothing about them but jumping to conclusions because of some characteristics, like their appearance.
Race Relations Act (RRA)	The main legislation dealing with racial discrimination in the UK. It deals with discrimination on grounds of race, colour, nationality, ethnic or national origins.
Sex Discrimination (Gender Re-assignment) Regulations 1999	A law that extended the SDA to cover discrimination against people who are intending to undergo, undergoing or have undergone gender re-assignment.
Sex Discrimination Act (SDA)	A law that makes it illegal to discriminate against someone on the grounds of their gender or marital status.
Stereotype	A stereotype is a negative judgement based on false or insufficient information. It can be based on any characteristic.
Victimisation	Victimisation is when someone is targeted and treated in a detrimental way because of a difference in behaviour or belief.

Equality Impact Assessment (EqIA) Form

In order to carry out this impact assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIA's. Please refer to these to assist you in completing this form and assessment.

SCREENING

What is the policy? (name and description)	Single Equalities Scheme (SES)
Which Directorate and Service is responsible for the policy?	Chief Executives
Name & contact details of person(s) carrying out the EqIA:	Mohammed Ilyas: Policy Officer – Equalities and Diversity
Date of assessment:	

Stage 1: About the Policy

Is this a new or an existing policy?	Refresh of existing Single Equalities Scheme
2. What are the aims, objectives or purpose of the policy?	<p>All public bodies are required to proactively promote equality of opportunity, eliminate unlawful discrimination and promote good relations between groups. They are also required to highlight how they will do this by producing and publishing a race, disability and gender equality scheme setting out how they will meet the general and specific duties.</p> <p>As well as meeting our legal requirements, the aim of the SES is to build equalities into all our functions, services, policies, processes and systems to ensure we are championing equality and diversity as an employer, service provider, procurer of goods services and community leader.</p> <p>In order to achieve the above, the SES highlights our cross cutting equality objectives with a three year action plan to achieve these.</p>
3. What factors / forces could prevent you from achieving these aims and	There are a number of factors which could prevent us from achieving the aims and objectives of the SES. These include:

objectives?	<ul style="list-style-type: none"> ▪ Organisational ability and capacity to implement the action plans within the SES; ▪ Lack of awareness of the SES and the action plans within it; ▪ Lack of awareness and training around equalities and diversity and its link to making frontline services more affective ▪ Resources and reduction in future budgets.
4. How does the policy contribute to the council's corporate aims and objectives?	<p>The SES contributes towards the Council's proposed vision and priorities, in particular to achieve the vision of 'Working Together: Our Harrow, our community'. It is imperative that he Council is able to proactively promote equality of opportunity and eliminate unlawful discrimination.</p>
5. Who is intended to benefit from this policy and in what way?	<p>Everyone (residents, service users, employees and the Council) will benefit from the SES, including:</p> <ul style="list-style-type: none"> ▪ Residents/Service Users – will benefit by receiving services which are fair and accessible and tailored to their needs; ▪ Employees – will benefit from fair and equitable policies, working in a pleasant environment and for an organisation committed to putting equalities at the heart of all its functions and services. Employees will also benefit from training and development opportunities; ▪ Council – will benefit from delivering efficient and improved services, avoiding potential litigation claims and enhancing the council's reputation for being recognised as championing equality and diversity and promoting community cohesion in one of the most diverse boroughs in London and the country.
Is responsibility for the policy shared with another department, authority or organisation? If so: <ul style="list-style-type: none"> • Who are the partners? • Who is responsible for the policy? 	<p>The SES is a cross council document and is co-ordinated by the Chief executives directorate. However the actions within the action plan relate to all directorates in the Council and everyone from senior managers, employees and elected members are expected to sign up to the SES.</p>
Stage 2: Collecting Evidence	
7. What data or benchmarking information is available to facilitate the screening of this policy? <ul style="list-style-type: none"> • Results from the Place Survey • Customer Satisfaction Surveys • Local or national research • Complaints or compliments 	<p>As a Local Authority, it is important to ensure we are aware of our communities and employees, understand their needs and requirements and develop our services to ensure they are fair, equitable and accessible.</p> <p>Harrow is one of the most ethnically and religiously diverse boroughs in London with people of many different backgrounds and life experiences living side by side.</p> <p>About a fifth (19%) of the population is over the age of sixty, which reflects a significant proportion of</p>

received

- CAA, IIP or other assessments

our population who could potentially have greater needs in terms of mobility and access to services.

In total, 30,783 (10.05%) of the boroughs population declared having a limiting long-term illness/disability. This shows we have a significant proportion of our service users with some form of disability.

The total ethnic minority population (not white British) grew from 50.3 per cent in mid-2001 to 53.4 per cent in 2007, the fifth highest proportion in England.

Based on the seven religions listed in the 2001 census, Harrow has the highest level of religious diversity of any local authority in England and Wales. This means that there is a 63 per cent chance that two people at random would be from different religious groups.

The 2001 census did not have a question on sexual orientation; however 222 persons declared living as same sex couples. It is estimated that 6% of the UK population are lesbian, gay or bisexual (LGB), which would equate to approximately 12,000 of our residents belonging to the LGB community.

The Council is also committed to developing a diverse workforce to reflect the community we serve. Our latest (April 2009 – March 2010) equalities report shows that the Council continues to have an older workforce with the majority aged between 35 and 54, i.e. almost a third of the council's workforce. There are less than 4% of employees under the age of 25 and a small number of employees aged 65 or over.

The percentage of employees of the total workforce declaring a disability was 1.89% which is lower than the percentage employed in 2008/9 of 2.08%. This is somewhat contradicted by the employee survey where 8% of respondents stated that they were disabled (although it is worth noting that only 55% of employees responded to the survey).

The Council employs a far greater percentage of women (75.39%) than men (24.61%) which is disproportionate to the composition of Harrow's general population of 49.98% women, 50.02% men. A lower number of men are employed at every level across the Council except for Payband 6 (highest payband) where there are 11 men and 5 women.

This year the percentage of employees from BAME groups in the workforce is 34.13% compared to 33.51% in 2008/9. The proportion of BAME employees in the workforce continues therefore to increase. However, this is still disproportionate to the community of Harrow.

		The Council does not monitor on religion or belief and sexual orientation, therefore there is no data for the workforce for these protected characteristics.	
8. Have you undertaken any consultation on this policy? Yes			
If yes, who was consulted? (this may include staff, members, unions, community / voluntary groups, stakeholders, residents and service users)			
Equality Strand	Name of Group	What consultation methods were used?	What do the results show about the impact on different equality groups?
Age 272	Age Concern Harrow Older Peoples Reference Group Partnership of Older People (POP)	The SES was developed through a two stage consultation process. The 1 st stage consultation took place for 8 weeks from 15 th February 2010 to 11th April 2010 and the second stage for a further eight weeks from 6 th September 2010 – 31 st October 2010.	The consultation did not highlight any potential impact on equality groups, however the feedback helped to develop the SES and informed the cross cutting objectives for the Scheme.
	Disability		
Gender	Harrow Women's Centre	The consultation included various methodologies including an online questionnaire, focus groups (for both employees, service users and voluntary/community groups) attending meetings of groups including Harrow Council's Black Workers Group, Staff Lesbian	
Race	Harrow Council's Black Workers Group		
Religion or Belief	Harrow Inter Faith Council		
Sexual Orientation	Harrow LGBT Forum Harrow Staff LGBT Forum		

Other (please state)	Primary Care Trust Unions HAVA Harrow Police Community and	Gay Bisexual Transgender Forum, Older Persons Reference Group, Harrow Association of Disabled People and Harrow LGBT Forum,					
9. If you have not undertaken any consultation, explain why?							
Proposed Consultation (for NEW policies)							
NOTE: If you have not undertaken any consultation as yet, list your proposals for consultation with target dates in the section below. Any proposed consultation needs to be completed before progressing with the rest of the EqIA.							
For guidance on consultation, see consultation guidelines on the HUB http://harrowhub/site/scripts/documents.php?categoryID=127							
Who do you plan to consult?	What method of consultation do you propose to use and what is your target date for consultation?	What did the results show about the impact on different equality groups?					
273							
Stage 3: Assessing Impact							
10. Considering the information / data from your research or/and consultation, is there any reason to believe that any adverse impact occurs or has the potential to occur on any equality group?							
Mark answer with an X	Age	Disability	Gender	Race	Religion / Belief	Sexual Orientation	Socio Economic Inequality
	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
	X	X	X	X	X	X	X

If yes, explain what the impact is and which group(s) this affects?													
If none, go to question 11.													
10A. What measures are you going to take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring		<p>Actions identified to eliminate/reduce adverse impact (Copy these measures into the Improvement Action Plan)</p>											
Equality Group													
Age													
Disability													
Gender													
Race													
Religion or Belief													
Sexual Orientation													
Socio Economic													
11. Is there any evidence or concern that direct discrimination may occur with reference to anti discrimination legislation?													
274		<p>Direct discrimination - occurs when a person is treated less favourably than others on the grounds of their age, disability, gender, race, religion or belief, or sexual orientation. Refer to main guidelines and toolkit for examples of direct discrimination.</p>											
Mark answer with an X	Age	Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
			X				X						X
If yes, explain which equality group(s) this affects? (You are encouraged to seek Legal Advice)													

12. Is there any evidence or concern that **indirect discrimination** may occur? If yes describe this below and whether you can credibly justify continuing with the policy in terms of the benefits of its wider aims?

Indirect discrimination - occurs when a rule, condition or requirement, which applies equally to everyone, has a disproportionately adverse effect on people from a particular equalities group when there is no objective justification for the rule. Refer to main guidelines and toolkit for examples of indirect discrimination.

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
		X		X		X		X		X		X		X

If yes, explain which equality group(s) this affects? (You are encouraged to seek Legal Advice)

13. Is the policy likely to affect relations between certain groups, for example because it is seen as favouring a particular group or denying opportunities to another?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
		X		X		X		X		X		X		X

If yes, explain which equality group(s) this affects?

14. If you have any further evidence or concern the potential impact the policy may have on a particular group(s), explain these below. This could be positive or negative. (if neither positive or negative, insert none)

Equality Group	Positive	Negative
Age		
Disability		
Gender		
Race		
Religion or Belief		
Sexual Orientation	The Council does not currently monitor on these characteristics (they are set out as actions within the SES action plan), and therefore does not hold	

		data to enable it to set workforce targets and actions towards developing a diverse workforce with regards to sexual orientation and religion or belief.
<p>Socio Economic Inequality</p> <p>15. How does the policy conform to the requirements of the Public Equality Duties, which require all council functions and services to:</p> <ul style="list-style-type: none"> • promote equality of opportunity, • eliminate discrimination • promote good relations between different equality groups <p>“the answer is none or N/A please state why? What amendments could be made?”</p>		<p>The SES has been developed to meet the requirements of the Public Equality Duties (as they stand at the moment) for Race, Disability and Gender but extending this to include Age, Religion or Belief, Sexual orientation and Social Deprivation. The cross cutting objectives of the SES have been identified through extensive consultation with residents, service users, employees and the voluntary/community sector and an action plan developed to achieve these.</p>
<p>16. Has an impact been identified?</p>	<p>Yes</p> <p>No (go to Q17)</p> <p style="text-align: center;">X</p>	<p>Positive</p> <p>Negative</p> <p>Go to Q17</p> <p>Go to Q16A</p>
<p>16A. If there is a negative impact on any group(s), is that impact unlawful?</p>	<p>Yes</p> <p>No</p>	<p>If legal, is the impact intended?</p> <p>Yes</p> <p>No</p>
<p>17. Have you received any complaints or compliments about the policy? If so, provide details.</p>	<p>We have received some positive feedback during the consultation stages of developing this SES, which include:</p> <ul style="list-style-type: none"> ▪ I believe the document outlines in great detail the Council's objectives; having this in one document is a really good idea and shows the value Harrow put's in its equality policies. 	

18. What monitoring is in place to check the effects of the policy on equality groups?	The SES Action Plan will be monitored closely to ensure delivery and the affect on different groups. Appendix 4 in the SES highlights what reports will be produced and who these will be reviewed by.		
19. How will the results of any monitoring be analysed, reported and publicised?	The monitoring reports will be forwarded to the relevant groups and published on the HUB (intranet) and the council's website. The Corporate Equalities Group (CEG), Corporate Strategy Board (CSB) and Cabinet will also receive an annual update on progress.		
20. What monitoring measures need to be introduced to ensure effective monitoring of the policy? (Include in Improvement Action Plan)	See Appendix 4 in the SES		
21. When will the policy be reviewed?	The SES is a three year document and will be reviewed / updated for Jan 2014. However, the new Equality Act 2010 proposes to introduce a single Equality Duty in April 2011 and therefore the SES may need to be reviewed in light of these requirements.		
Decision			
22. On the basis of your answers so far, what is the potential for differential impact? (see note 19.8 in Corporate Guidance Document)	High <i>(Large adverse impact on equality groups)</i>	Medium <i>(Some adverse impact on equality groups)</i>	Low <i>(Low potential for adverse impact on equality groups)</i>
Mark with an X			X
Go to Stage 4 for any actions to improve policy and sign off.			

FULL ASSESSMENT											
23. Does the policy impact less favourably on a certain group or groups in comparison with others?											
Mark answer with an X	Age		Disability	Gender	Race	Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	

Age				
Disability				
Gender				
Race				
Religion or Belief				
Sexual Orientation				
Other				

Stage 4 Making Adjustments (Improvement Action Plan)

32. List below any recommendations for action that you plan to take as a result of this impact assessment. This will include any actions identified throughout the EqIA. *(Insert additional rows as required)*

Area of potential adverse impact e.g. Race, Disability	Action proposed	Lead Officer	Timescale	Resource implication	Comments
All	Publicise and raise awareness of the SES to all employees, elected members and service users	Equalities Officer	June 2011	Staff time	
All	Publish the SES on the Council's website and the HUB	Equalities Officer	Jan 2011	Staff time	
All	Monitor the action plan to ensure implementation	Equalities Officer Corporate Equalities Group	Ongoing	Staff time	

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Stage 5 – Reporting Results

We are required to ensure all completed EqIA's will be put onto the Council's website under the equality and diversity section and they will also be made available to members of the public on request.

<p>33. Methods of publication – how will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc</p>	<p>The Council's website and the HUB (intranet)</p>
<p>Stage 6 - Monitoring It is important to monitor the actions arising from the impact assessment to ensure improvement to policy.</p>	
<p>34. How will the actions be monitored to ensure improvement to the policy?</p>	<p>The actions will be implemented by the Equalities Officer and reported to the Corporate Equalities Group</p>
<p>Stage 7 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group) The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG), who will discuss and agree the actions in the Improvement Plan.</p> <p>Once agreed the actions from the Improvement Plan need to be included in Departmental Business Plans for implementation.</p>	
<p>35. Which group or committee considered the action plan and agreed the actions to improve the policy? If you agreed no further action as a result of the EQIA, explain why?</p>	
<p>Signed: (Lead officer completing EqIA)</p>	<p>Mohammed Ilyas</p> <p>Signed: (Chair of DETG)</p> <p>Alex Dewsnap</p>
<p>Date:</p>	<p>9th October 2010</p> <p>Date:</p> <p>22nd November 2010</p>

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**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE
AND SCRUTINY SUB-
COMMITTEES**

Date of Meeting:	27th January 2011
Subject:	Better Deal for Residents Review Standing Review Scope
Responsible Officer:	Alex Dewsnap Divisional Director, Partnership Development and Performance
Scrutiny Lead Member area:	Cllr Jerry Miles, Corporate Effectiveness Policy Lead Member Cllr Tony Ferrari, Corporate Effectiveness Performance Lead Member
Exempt:	No
Enclosures:	Appendix One: Scope for Better Deal for Residents Standing Scrutiny Review

Section 1 – Summary and Recommendations

This report accompanies the scope for the Standing Review of the Better Deal for Residents

Recommendations:

Councillors are asked to:

- Consider and agree the scope for the standing review.

Section 2 – Report

Background

The council needs to find significant savings over the next three years. Whereas in the past, it might have been feasible to reduce spending on a service-by-service basis, the extent of the savings required means that many services will no longer be viable if cuts are delivered in this way. As a result the council has embarked on a programme to fundamentally transform the organisation and its structures and to broker a new relationship with residents. The Better Deal for Residents programme is the means by which the council hopes to make these changes. The programme comprises a range of projects designed to deliver major service reconfiguration. It is the purpose of this scrutiny review to provide additional accountability for the programme and ensure that the programme is properly project managed and that the impact on residents is fully understood.

Financial Implications

The costs of delivering this project will be met from within existing resources.

Performance Issues

There are no specific performance issues associated with this review as it is designed to monitor the implementation of the Better Deal for Residents programme.

Environmental Impact

There are no environmental impact issues associated with this review.

Risk Management Implications

The successful delivery of the work of this standing review will support the management of risk by providing additional accountability and ensuring that the full impact of projects is understood.

Equalities implications

Was an Equality Impact Assessment carried out? Yes () No (✓)

It is the aim of this review to provide additional accountability to this major transformation programme. As such it is the programme itself which will be subject to equalities impact assessment.

Corporate Priorities

This review will contribute to the delivery of the following *draft* corporate priorities:

- Keeping neighbourhoods clean, green and safe
- United and involved communities: a Council that listens and leads
- Supporting and protecting people who are most in need
- A Town Centre to be proud of: changing Harrow for the better

Section 3 - Statutory Officer Clearance

Not required for this report.

Section 4 - Contact Details and Background Papers

Contact: Lynne Margetts, Service Manager, Scrutiny. 020 8420 9387

Background Papers: None

APPENDIX ONE: BETTER DEAL FOR RESIDENTS PROGRAMME STANDING REVIEW - DRAFT SCOPE

OVERVIEW AND SCRUTINY-COMMITTEE

NOVEMBER 2010

VERSION NUMBER – 4

VERSION HISTORY

Initial draft

Version 2 considered at review group meeting on 18th November

Version 3 amended after further discussions with the Chairman 23rd November

Version 4 final version agreed by the review group on 16th December

1	SUBJECT	Better Deal for Residents Programme
2	COMMITTEE	Overview and Scrutiny committee
3	REVIEW GROUP	<p>Councillors Cllr Nana Asante Cllr Chana Cllr Ann Gate Cllr Macleod-Cullinane Cllr Osborn Cllr Phillips Cllr Krishna Suresh Cllr Wright (Chairman)</p> <p>Co-optees Rita Jourdan Hema Mistry Elizabeth Hugo Linda Robinson Abigail Matsika Seamus English</p>
4	AIMS/ OBJECTIVES/ OUTCOMES	<p>To consider the content of the Better Deal for Residents programme in terms of ambition, relevance, appropriateness</p> <p>To ensure effective project management processes are in place for the programme</p> <p>To consider the impact of the programme on:</p> <ul style="list-style-type: none"> • the Council – is it achieving the outcomes envisaged – linked to the effectiveness of project management processes • residents <ul style="list-style-type: none"> ○ what impact are the changes having and how are these being mitigated – Better Together/Big Society,

		<ul style="list-style-type: none"> ○ how far do residents understand/appreciate the need for significant change are their opinions being taken into account, are they being actively engaged/convinced in the delivery of change ● partners – are we working more efficiently with partners to deliver change, what is the impact on their services ● managers – how well are they being supported in delivering change whilst at the same time being subject to that change
5	MEASURES OF SUCCESS OF REVIEW	<p>Review is able to ensure that:</p> <ul style="list-style-type: none"> ● Programme delivers real change in service delivery ● Programme delivers anticipated savings ● Programme delivers change in residents'/service users' attitude to service delivery and responsibilities
6	SCOPE	The content of the Better Deal for Residents Programme
7	SERVICE PRIORITIES (Corporate/Dept)	
8	REVIEW SPONSOR	Tom Whiting, Assistant Chief Executive
9	ACCOUNTABLE MANAGER	From relevant service area
10	SUPPORT OFFICER	Service Manager Scrutiny
11	ADMINISTRATIVE SUPPORT	From within Scrutiny Team
12	EXTERNAL INPUT	<ul style="list-style-type: none"> ● Residents ● Partner organisations ● Service users
13	METHODOLOGY	<ul style="list-style-type: none"> ● Consideration of the detail of the programme ● Investigation of the effectiveness of the performance management of the programme to ensure best practice <ul style="list-style-type: none"> ○ examination of a number of cases studies with relevant project directors ○ consideration of the overall PMO performance management process ● Regular updates on progress – to include achievement of anticipated savings ● Parallel investigation of the impact of the programme on residents and partners (including voluntary sector) ● Investigation of particular areas under the 3rd priority 'Building on the community spirit of residents to be more involved in the future of the Borough'

14	EQUALITY IMPLICATIONS	It is anticipated that the Better Deal for Residents programme will deliver significant change in the way the council organises itself to deliver services to local people. Harrow is an extremely diverse borough and the organisation cannot make assumptions about service needs of the population. As such changes to services and changing the expectations and behaviours of our residents will need to reflect the differing needs and experiences of the population. The council must be able to assure itself that adverse equalities implications for staff or on residents are identified and where possible, mitigated. The review will monitor this.
15	ASSUMPTIONS/ CONSTRAINTS	
16	SECTION 17 IMPLICATIONS	This could be a component of the project in so far as the Better Together stream is implemented.
17	TIMESCALE	Ongoing
18	RESOURCE COMMITMENTS	The project will be delivered from within the existing scrutiny budget
19	REPORT AUTHOR	Lynne Margetts
20	REPORTING ARRANGEMENTS	<p>Quarterly reports on progress to the Overview and Scrutiny Committee Interim report to the Overview and Scrutiny Committee in November 2011</p> <p>Outline of final formal reporting process: To Service Director [] TBC To Portfolio Holder [] TBC To CMT [] TBC To Cabinet [] TBC</p>
21	FOLLOW UP ARRANGEMENTS (proposals)	TBC

**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE
AND SCRUTINY SUB-
COMMITTEES**

Date:	27 th January 2011
Subject:	Scrutiny Work Programme Update
Responsible Officer:	Alex Dewsnap Divisional Director, Partnership Development and Performance
Scrutiny Lead	All
Member area:	
Exempt:	No
Enclosures:	None

Section 1 – Summary and Recommendations

This report updates members of the Overview and Scrutiny committee of progress on the 2010/11 work programme.

Recommendations:

Councillors are recommended to:

- I. Consider the content of the update
- II. Approve and comment on action being taken
- III. Consider whether/when to schedule the standing review of the budget and the health and housing project

Section 2 – Report

Introductory paragraph

This report updates members of the Overview and Scrutiny committee on the delivery of the scrutiny work programme.

Following the election in May and the constitution of the scrutiny structures, the Overview and Scrutiny committee commissioned a number of projects. In designing its work programme, the Overview and Scrutiny committee acknowledged the need to build flexibility into the programme in order to respond swiftly to particularly pressing needs and issues, the council and partners are facing significant challenges and if scrutiny is to effectively champion the needs of local people then it is critical that councillors are able to consider issues as they arise. As such, a number of projects initially included in the programme were reprioritised and in some instances dropped and it is anticipated that this will be a regular feature of the programme.

The October Overview and Scrutiny committee received a report outlining progress on projects. This report updates information previously provided.

Closure of Harrow Magistrates' Court challenge panel

This project was completed in September 2010. The Ministry of Justice has since announced that the closure of the magistrates' court will proceed.

IT Contract challenge panel

This project was completed in September 2010.

Closure of Pinner Village Surgery challenge panel

This project was completed in October 2010. Final proposals from NHS Harrow with regard to mitigation of the impact of the closure were presented to NHS Harrow board meeting on 14 December 2010. The chair of the panel and the leads will be considering the response.

Health White Paper 'Equity and Excellence: Liberating the NHS'

This project was completed in October. The results of the consultation have been announced and significantly, the proposals with regard to the role of scrutiny in respect of health generally and the proposed Health and Well Being Boards have been modified.

Harrow Association of Voluntary Service (HAVS) challenge panel

This project will consider the longer term implications of the investigation into HAVS finance and governance arrangements following events at the organisation. Two panel sessions are proposed in January and February, the first with internal colleagues, the second with external partners. The final report will be presented to the Overview and Scrutiny committee in February.

Housing Ambition Plan challenge panel

This challenge panel was originally requested by the Divisional Director Housing Services as a means of assessing how the service had improved resident engagement in service delivery through the Housing Ambition Plan. There have been a number of attempts to arrange this challenge panel but

this has not proved possible. In the light of these difficulties, the chair and vice chairman of Performance and Finance sub committee have scheduled a discussion of the Housing Ambition Plan for the 18th January meeting of the committee and, dependent upon the content of the discussion, may advise the Overview and Scrutiny committee that the challenge panel is no longer required.

Standing Review of the Better Deal for Residents

At its meeting in October, the Overview and Scrutiny committee agreed that this project be run separately to the Standing Review of the Budget (see below). The group has now met twice with a further meeting scheduled for 24th January. The scope for the project is included elsewhere on the agenda for this meeting. The initial phase of the project will consider the efficacy of the council's own project management processes and a number of projects included in the Better Deal for Residents (BDfR) Programme have been selected for more detailed consideration:

- Reablement
- Libraries
- Changing Tenant Behaviour

The project will then move on to consider the efficacy of the BDfR programme and its impact on residents and staff. This is a long-term project which will 'shadow' the delivery of BDfR. Quarterly reports from the project will be presented to the Overview and Scrutiny committee and an interim report will be presented to the committee in November 2011.

Performance management review

With the demise of the Comprehensive Area Assessment and the abolition of the National Indicator Set, the Overview and Scrutiny committee has decided to undertake a project which will support the council's response to these changes. There are two phases to this project: assessment of the usefulness of national indicators still collected – what should continue and what can be disposed of – and how the council will respond to the abolition of the Place Survey; and consideration of what a revised performance management framework might comprise in the future, taking advantage of Government proposals to liberate the performance management processes from central control. Interviews with corporate directors and performance management professionals are currently underway and a report from phase one of the project will be presented to the Overview and Scrutiny committee in February.

Projects still to be scheduled

Standing Review of the Budget

The Overview and Scrutiny committee agreed that this project would be run separately from the Standing Review of the Better Deal for Residents and would commence as resources permit. It is likely that this will commence as other projects are completed – early spring 2011.

Health Policy

Significant changes to the provision of health services is anticipated in the coming months and therefore resources are currently being allocated to assuring that the Health sub committee is able to respond to these changes at both a national policy level and also in terms of proposals for local service delivery. In particular, the development of effective relationships with the Health and Well Being Board and Health Watch is a priority for this committee. The Health sub committee is currently considering the Public Health White Paper 'Healthy Lives, Health People' and will be sending a response in time for the deadline to the consultation in March 2011.

Health and Housing

It has been proposed that some work should be carried out on the current changes to housing policy and the social impact and effects of the changes to policy for example in respect of overcrowding and general well being. This could be addressed by looking at a specific case study.

Financial Implications

There are no financial implications associated with this report as all projects will be delivered from within the existing scrutiny budget.

Performance Issues

It is anticipated that all of the current projects will contribute to improved performance. In particular, the project to redesign the performance management framework will hopefully help the council to focus on those issues of most importance to residents and thus deliver targeted service improvement

Environmental Impact

There are no environmental impacts associated with this report.

Risk Management Implications

There are no risk management implications associated with this report.

Equalities implications

Was an Equality Impact Assessment carried out? No

The projects outlined in this report are investigating various components of service delivery and each project incorporates the consideration of equalities issues. However, where proposals for change are made, it will be the responsibility of the relevant service area to undertake equalities assessment.

Corporate Priorities

To be confirmed

Section 3 - Statutory Officer Clearance

Not required for this report.

Section 4 - Contact Details and Background Papers

Contact:

Lynne Margetts, Service Manager Scrutiny, 020 8420 9387

Background Papers:

None

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