

Overview and Scrutiny Committee

AGENDA

DATE: Tuesday 12 June 2012

TIME: 7.30 pm

VENUE: Committee Rooms 1&2
Harrow Civic Centre

MEMBERSHIP (Quorum 4)

Chairman: Councillor Jerry Miles

Councillors:

Sue Anderson
Ann Gate
Krishna James
Zarina Khalid

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: Mrs A Khan/1 Vacancy

(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. Ben Wealthy
3. Victoria Silver
4. Sasi Suresh
5. Krishna Suresh

1. Chris Mote
2. Tony Ferrari
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;
- (b) all other Members present in any part of the room or chamber.

3. MINUTES (To Follow)

That the minutes of the meeting held on 30 May 2012 be taken as read and signed as a correct record.

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

(if any).

8. DEVELOPMENT PLAN DOCUMENTS (DPD)

Reports of the Corporate Director of Place Shaping

- (a) Harrow and Wealdstone Area Action Plan: Pre-Submission Consultation Document (Pages 1 - 14)
- (b) Pre-Submission Development Management Policies (Pages 15 - 30)
- (c) Pre Submission Site Allocations DPD (Pages 31 - 44)
- (d) Revised Local Development Scheme (Pages 45 - 50)
- (e) Revised Proposed West London Waste Plan: Pre-Submission Consultation Document (Pages 51 - 58)

9. SAFEGUARDING REVIEW REPORT (To Follow)

Report of the Divisional Director of Partnership Development and Performance

10. SCRUTINY WORK PROGRAMME UPDATE (Pages 59 - 62)

Report of the Divisional Director of Partnership Development and Performance

11. ANY OTHER BUSINESS

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

AGENDA - PART II

12. STRATEGIC FUTURE OF LEISURE AND LIBRARIES PROVISION - OUTCOMES

Verbal update from the Divisional Director of Community and Culture

NIL

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**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE**

Date of Meeting:	12 June 2012
Subject:	Harrow and Wealdstone Area Action Plan: Pre-Submission Consultation document
Responsible Officer:	Andrew Trehern, Corporate Director Place Shaping
Scrutiny Lead Member area:	Environment and Enterprise
Exempt:	No
Enclosures:	Harrow and Wealdstone Area Action Plan: Pre-Submission Consultation document (This enclosure will be circulated separately)

Section 1 – Summary and Recommendations

This report summarises the comments made to consultation on the Preferred Option document in January 2012 and the changes that have been made to prepare it for pre-submission consultation and submission to the Planning Inspectorate for Examination in Public.

Recommendations:

The Committee is requested to consider and comment on the pre-submission version of the Harrow and Wealdstone Area Action Plan which is to be reported to Cabinet at its meeting of 20th June 2012.

Reason: (For recommendation)

To progress production of the Harrow and Wealdstone Area Action Plan in

Section 2 – Report

Harrow's Core Strategy and the London Plan identify the Harrow and Wealdstone area as location for further growth and development. It is a corporate priority to prepare an Area Action Plan (AAP) to give effect to this strategic designation. The AAP is being prepared jointly with the Greater London Authority and other partners and has already been the subject of two rounds of public consultation:

Issues and Options – 13 May to 24 June 2011; and
Preferred Option – 12 January to 23 February 2012

This report introduces the next stage of the AAP's production – the 'pre-submission' stage, and explains how its preparation has responded to the comments received to consultation on the Council's Preferred Option document.

Options Considered

The preparation of the AAP, as a corporate priority, has come about due to the significant existing and on-going development interest in key strategic sites within Harrow town centre and Wealdstone and the identified need to positively respond to such proposals, providing leadership and detailed policy guidance as to the appropriateness and contribution such development is to make in delivering Harrow's vision for the area. The option not to progress with the preparation of the AAP can therefore be discounted.

In terms of policy content, and the allocation of sites for different land uses, the 2012 consultation on the AAP represented the Council's 'preferred option'. The purpose in publishing that document was to seek views and opinions on whether the option put forward had community support. In the most part, the comments received were positive and do not prompt a major re-think to the policies or the suite of site allocations. Therefore, the option to significantly alter the policies or site allocations at this stage would need to be supported by robust evidence to justify the change, and would likely necessitate the need to undertake a further round of draft plan public consultation. In the absence of such evidence, this option is also dismissed.

Comments Received and the Council's Response

In total, we received around 500 specific comments from 58 respondents to the AAP Preferred consultation. The detailed comments, and the Council's response to each, are provided in schedule to be published and made

available on the website alongside the AAP Pre-Submission Consultation document.

The following section of the report summarises the main issues raised through consultation on the AAP Preferred Option and outlines the Council's proposed response to these and the changes made to the document.

The report does not include reference to policies and allocations where the comments were all in support; offered only minor change; or no comments were received.

Policy AAP 1: Development within Harrow town centre

There was general support for the policy, especially the requirements for high quality design. Most of the comments received sought to expand on the existing policy to provide greater clarity and ensure the objectives for the Heart of Harrow and the sub area were adequately reflected. Changes have therefore been made to reflect these where they seek to strengthen the policy. In other instances, in preference to amending the AAP policy, reference has been made to other relevant policies in the AAP or in the Development Management DPD rather than repeating these again here.

Policy AAP 2: Station Road

Most comments sought clarity on the definition of terms used. Changes have therefore been made to provide this. Support is given to the restoration of Safari Cinema and for improving the environs of Station Road. A further policy has been added that advocates the planting of street trees, the segregation of new cycle provision and the establishment of a central reserve, to promote the boulevard character to which Policy AAP2 refers.

Policy AAP 3: Wealdstone

All comments received were in support of the regeneration of Wealdstone through the policy. The only change proposed is to the reference to the 'masterplans' in chapter 6, where it was agreed that the reference should be proposals being in general conformity with the 'site allocation' and 'development principles' set out in chapter 6. This change applies throughout the AAP.

Policy AAP 4: Achieving a high standard of development throughout the Intensification Area

All of the comments were again supportive of the policy. The purpose of the policy is to provide development standards applicable across the whole of the Heart of Harrow, whilst leaving policies AAP1 – 3 to add further detail specific to the broad sub areas. Given the purpose of the Policy, it was felt that it should really come before the sub area policies, so there is a change in sequencing.

Policy AAP 5: Density and use of development

There was opposition from some residents to Policy AAP5 D, which sought to enable consideration of densities in excess of the London Plan density guidelines where development proposals also exceeded the London Plan, Core Strategy and AAP design and environmental standards and made an appropriate contribution to on and off-site infrastructure provision. To overcome these concerns a change has therefore been made to the policy to clearly state that proposals that represent 'over development' of a site will be resisted.

Policy AAP 6: Development height

There was strong opposition to the policy but for different reasons. Some object to the need for tall buildings within the intensification area due to their potential for impact upon the skyline and the Hill. Other wish the guidance to be more detailed, while the agents for the Dandara site object to much of the policy criteria and design parameters, which they consider goes against the Secretary of State's findings from their appeal. The latter also objects to the requirement to provide public rooftop access on tall buildings as being inconsistent with the London Plan.

In light of the comments, significant amendments have been made to the Policy to clarify the strategic approach to tall or taller buildings; the potential impacts to be addressed; their role, function and location; the criteria against which proposals are to be assessed; and the integration with the protection of local views. Other minor amendments are made to overcome the issues of inconsistency identified. Further material is also provided to help illustrate what is intended through application of the Policy.

Policy AAP 8: Enhancing the setting of Harrow Hill

This policy is informed by the Harrow Views Assessment (2012) and is denounced as flawed by the agents for Dandara and broadly supported by everyone else including the GLA. In response to the comments, the AAP has been amended to incorporate assessment criteria draw from the detailed visual management guidance within the Harrow Views Assessment (2012). Other changes are made to better clarify the relationship between associated policies within the Development Management DPD, and the need for development proposals that would be subject to protected views to submit a views assessment.

Policy AAP 9: Flood risk and sustainable drainage within the Intensification Area

The comments received sought to make the policy more robust, including dealing with surface water flood risk and avoiding increasing the impermeability of the AAP area. These will help strengthen the policy and have therefore been made in the AAP.

Site 2 – Kodak and Zoom Leisure

At the time of consultation on the AAP Preferred Option, consultation was also being undertaken on the Land Securities planning application for the site. A number of representations drew on differences between the two, including:

- the location of the school, which most agreed would be best located on the Zoom Leisure portion of the site;
- the supermarket, which received general support; and
- the footbridge over the main railway line, which most thought was important and should be required of the planning application.

Of the two masterplans, the one submitted with the planning application was noted as being preferred. There was support for the delivery of family housing, new employment space and community facilities, and especially for the concept of a green corridor running through the site to Headstone Manor. A number of representations noted concerns over the loss of open space on Zoom Leisure in terms of its impact on Headstone Manor's setting but not in respect of the loss of the playing pitches.

However, a common theme of the representations is the concerns over traffic impact on local roads and, in particular, the Harrow View / Headstone Drive junction, with most believing that the recent construction of Good Will to All site has compromised a comprehensive redevelopment of the junction being advanced.

Given the comments received, the stage the planning application has reached, and the comprehensive nature of the evidence produced in support of the planning application, the AAP has been changed to more closely reflect the Land Securities proposal in terms of uses, quantum and layout. As the Land Securities proposal is an outline application, much will be left to reserve matters. In consultation with Design for London, further changes have therefore been made in the AAP to clearly articulate the detailed design considerations that will need to be considered through subsequent applications for the reserve matters.

With respect to traffic impacts, these have been modelled by Transport for London (TfL). The Council, TfL and Land Securities are now considering the mitigation measures to be put in place to address the identified impacts.

Site 3 – Teachers Centre

The AAP proposal met with strong opposition from Governors of the Whitefriars Community School. In particular, they felt the wording made it unclear as to the future of their school on the site and were concerned with the loss of their playing fields, and the hall and gymnasium which they share with the Teachers Centre. Changes have therefore been made to the text to assure the community that the school is to be retained on the site and that the proposal for a new secondary school on the remainder of site would include the re-provision of the hall and gym, if these are not to be retained, and would require shared use of such facilities between the schools. The text has also been amended to clarify that, in accordance with the Core Strategy, there is to be no net reduction in the amount of open space provision on the site but that

its reconfiguration is likely to be required to provide for the new school, and to ensure an element of wider public use of the open space is maintained.

The other main concern raised by a number of respondents was the impact on traffic, with many citing that the Teachers Centre is some distance from public transport and that the local roads were already congested as a result of the existing schools in close proximity to the site, including the Whitefriars Community School, Salvatorian College and the Sacred Heart Language College.

Given that the site has a long history of education use, the site remains the Council's preferred option for a new secondary school. Further changes have been made to extend the boundary of site to take in the builder's yard on Cecil Road, the Whitefriars Industrial Estate and Aerospace House. The designation will provide for continued industrial use of these sites as well as for further education use, enabling the consideration of a much larger parcel of land to provide further options to accommodate a new school more comfortably on the site. It will also enable wider options to be considered to mitigate the traffic impacts arising from any school proposal. While TfL have modelled these impacts, the mitigation will need to respond to the final school proposal for the site, and being a free school, this remains unknown at this time. Further consultation with the community will therefore need to take place prior to application coming forward for a new school on the site. The Council will need to be satisfied that any traffic impacts can be adequately mitigated for any proposal to be considered acceptable. This will need to take account of the cumulative impacts of the new and existing schools and will require wider solutions to be considered. Amendments are made to the AAP to reflect these requirements.

Site 4 – Colart

A number of representations oppose the proposals for housing on the site and wish to see it retained for employment. The Salvatorian College also expressed a desire to expand onto part of the site.

The Employment Land Review highlights the lack of demand for industrial uses in the borough, especially large industrial units. The key consideration for this site is in securing new jobs equivalent in number to that achieved when Colart were in operation. This is to be achieved through retention of the Winsor and Newton building but will likely require additional employment provision to be made elsewhere on the site, potentially the area fronting the High Street which is subject to flooding. This part of the site could also provide for community use as an alternative to employment provision should the retention and conversion of the existing unit(s) prove to be a more viable option. As with Kodak and other identified industrial sites, enabling residential development will be required to deliver new employment space and community use, and therefore the allocation of the site for employment-led mixed use development has not changed.

Following further discussion with the College, the Council has requested they submit further evidence to support their proposal for expansion. While this is yet to be received, the AAP has been amended to accommodate this

possibility but specifies that this is subject to the College providing the robust evidence required, including their ability to purchase the land. In making provision for the College's expansion, it is appropriate to include both the petrol station and adjoining workshop unit within that building envelope.

Site 5 – Wealdstone multi-storey car park

The representations to the proposal for this site were limited but mixed. One saw the need for a supermarket as being crucial to support the town centre, two were concerned with the potential loss of the parking and the impact of this on the vitality of the town centre, while Land Securities questioned the deliverability and suitability of the site for a supermarket.

Based on the comments received, and the fact that the Kodak site will now make provision for a large supermarket, the option of pursuing a supermarket on this site does not seem realistic. In the absence of a clear proposal for the site, it is proposed not to allocate it in the AAP. However this would not restrict proposals from coming forwards but would require it to be considered on its merits against the policies of the AAP and the delivery of the sub area objectives.

Station Road Sub Area

Many comments were received on the current state of Station Road, in terms of its low environmental quality, traffic congestion and the difficulties experienced by cyclists and pedestrians. The majority of the representations were therefore supportive of the AAP proposals. However, a number of them raised concern with the expansion of Tesco's as potentially undermining the sub-area objective to continue to maintain and support the small independent shops and businesses present along much of Station Road. A number also wish to know what the future plans are for the Magistrates Court, and query why it is not included as a site in the AAP.

The application to extend the existing Tesco store has already been approved, although yet to be constructed. Evidence was submitted with the application, and independently verified, that showed there would be limited impact on the existing retail within both Harrow town centre and Station Road.

With regard to the Magistrates Court, the Council understands this was recently sold by the Department for Justice to a charity organisation, but as yet their intentions for the site remain unknown. It is therefore not appropriate to include the site in the AAP and provide speculation as to its future use, noting that, if the site was to come forward for development, the policies of the AAP and the objectives for this sub-area provide sufficient basis upon which to determine the merits of the proposal.

Site 10 – Civic Centre

The number of representations made to this site allocation is limited but they note the amount of land currently given over to parking on the site and are therefore generally supportive of development. Issues raised are with the proposed building heights on parts of the site (i.e. those fronting Station Road

and Railway Approach); whether it is necessary to demolish the existing Civic Centre; where a new Civic Centre is to be located; and the need for the pedestrian access through to Wealdstone Station to be prominent and large.

To respond to the above issues a number of changes are proposed to the allocation and its text. These include the realignment of the pedestrian route to provide a more straight line of sight through to the Station from the new civic space; a widening of the pedestrian access and green space; the requirement for an active frontage along the new pedestrian route; a reduction in buildings heights on parts of the site; and a requirement that non-active frontages on Station Road be stepped back.

Harrow Western Gateway Sub Area

The representations note that this sub area is dominated by several large developments which were approved and commenced before the AAP was drafted. They note little can be done in respect of these developments. However there is a clear desire, and one that is shared by the Council, to see the Bradstowe House development completed.

The primary concern raised to the sub area is the inclusion of the northern side of Pinner Road within the AAP boundary, which a number of respondents say should not be subject to intensive development given the residential nature of the area and the fact it borders the recreation ground.

The reason why the AAP boundary extended to the northern side of Pinner Road was not to facilitate development in this location but rather to take account of the junction and the connection between the sub-area and use and access to Harrow Recreation Ground. This is also the reason why the boundary of the Wealdstone West sub area extends to include Headstone Manor, in ensuring development of Zoom Leisure had regard to the setting of this heritage asset. Likewise, within the Wealdstone East sub area, the boundary included Bryon Recreation Ground to ensure development on the Driving Centre respected the open space. However, in light of the comments received, the boundary has been amended as cross boundary matters are adequately dealt with by appropriate amendments to AAP Policy 5.

Harrow Town Centre Sub Area

There is strong support for the improvements of Harrow bus and tube stations, the creation of the link through Havelock Place, and for the enhancements to Lowlands Recreation Ground. Greater clarity is wanted about the provision of the new central library and Civic Centre, and there is general disappointment that the AAP does not make provision for a theatre in the town centre. Concerns over buildings heights are also raised.

Amendments have therefore been made to the site allocations to state Council's preference for the location of a new central library and for the new Civic Centre. The latter also includes the consideration of flexible democratic space to be shared and used as possible theatre space. The issue of buildings heights is addressed earlier in this report in respect of changes to AAP Policy 6.

Site 19 – 51 College Road

The vast majority of representations received to this site allocation were from the agents representing the site. In particular, they do not want the site plan to be so specific as to show a potential site layout; have requested that the figures for housing and jobs to be expressed as targets and not a minima; have requested the design consideration state a building up to 19 storeys in height; query the prescriptive illustration of the proposed view to be created; seek the range of appropriate town centre uses to be included in either the leading or supporting uses described for the site; query viability and policy compliance in meeting some of the objectives for the site; and seek changes to the terminology used.

In response to the representations, changes have been made to the AAP where these sensibly add clarity. Changes have also been made to enable flexibility in the consideration of the design and layout of the final scheme to address the objectives for the site and sub-area, which have not changed.

Site 23 – Lyon Road

The comments received in respect of the Lyon Road development were concerned with building heights and, in particular, the impact upon neighbouring developments and the potential to undermine the sub area objective to create a transition between the town centre and the residential area just beyond the town centre boundary.

The above concerns were considered in the context of the recent granting of the planning application for the Lyon Road site. The changes to the site in the AAP are therefore made to reflect the now permitted development.

New sites proposed

Proposals were put forward by four landowners for the inclusion of their sites in the AAP allocations. These were:

- Plantation Garden Centre, Kenton Rd / Peterborough Rd, for retail and residential use;
- Wealdstone Police Station, Wealdstone town centre, for a residential-led development providing retail units within the central courtyard
- Areospace House, Cecil Road, for residential-led mixed use development to enable relocation and expansion of the existing business to another more suitable site within the borough.
- Wickes House, Station Road, which the land owner states is to be vacated by the current tenants in September 2013, and is therefore being proposed for active ground floor uses fronting Station Road and hotel or residential use above and across the remainder of the site;

The Plantation Garden site is outside of the current AAP boundary area. Nevertheless, the land is designated Metropolitan Open Land, and therefore its allocation for more intensive development would be at odds with the Core Strategy.

With respect to the Wealdstone Police Station, the agents acting on behalf of the Metropolitan Police were to provide an updated estates strategy or other evidence as appropriate, to demonstrate how provision to serve the area is proposed to be met. To date such evidence has not been provided, and without it, the allocation of the site for change of use would be at odds with the Core Strategy (Policy CS1X)

As already outlined above, the Areospace House site is to be included in the extended boundary of the Teachers Centre site and allocated for continued industrial use as well as education / training / community and economic (non-town centre) uses.

While the agents for Wickes House submitted statements to support their proposals for a change in use, the Council notes that the site is currently occupied (at least for another year); that no marketing of the site has taken place upon which to gauge levels of interest; the building is of good quality in comparison to most stock within the AAP area; and that the proposals put forward (with the exception of the hotel development) would be inconsistent with the objective of the AAP to renew the office market. In light of these matters, and without further robust evidence, it is not considered appropriate to include the site as an allocation within the AAP at this time. If the site was to come forward for development, the policies of the AAP and the objectives for this sub-area provide sufficient basis upon which to determine the merits of the proposal.

Next steps

The pre-submission AAP will be published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (previously 'Regulation 27'). This represents the final stage of consultation, being the version of the AAP that it is intended to submit for Examination in Public, and requires consultees to consider whether the plan meets legal requirements and is 'sound'.

To be a sound plan, the AAP must be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

In relation to each of these tests:

Positively Prepared

The NPPF states that plans should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.

The AAP represents a pro-active blue-print to deliver growth and development in accordance with its strategic designation as set out in the London Plan and Harrow Core Strategy. It seeks to address the growth of the area as a whole whilst recognizing that the area also contains a mosaic of different characters and functions, and a wide variety of opportunity sites that can each contribute differently to the delivery of the Heart of Harrow spatial strategy and sub areas objectives.

Justified

The NPPF states that the plan should be the most appropriate strategy when considered against the reasonable alternatives.

The evidence base underpinning the Core Strategy also justifies the provisions of the AAP. Where necessary, the Core Strategy evidence has been supplemented by further more detailed evidence specific to the area. This includes a baseline character assessment; transport modeling, view assessment, and building heights analysis. The policies represent the most appropriate local response to the London Plan and the Core Strategy policies.

Effective

The NPPF states that the plan should be deliverable over its plan period and based on effective joint working on cross boundary matters.

The AAP is a joint document with the Mayor for London. The policies have been drafted to provide positive support for appropriate development and to focus on impacts that need to be managed. The Council sought significant input in the early drafting of the document from a consultant team that included urban design, transport, and development viability specialists to specifically ensure that the proposals put forward were both realistic (in terms of quantum and type) and deliverable (in terms of viability).

Consistent with national policy

The Area Action Plan has also been revised to ensure that it complies with the recently published NPPF, as well as taking on board consultee comments wherever possible.

The pre-submission consultation is scheduled to take place during July and August. Following the consultation, the LDF team will consider all representations received and if necessary produce and consult upon any minor modifications resulting from that consultation. It is anticipated that the AAP will be submitted to the Planning Inspectorate in September and that Examination in Public will take place during December. This programme should enable adoption of the AAP to take place by April 2013.

Further Editorial Requirements for the Pre-submission Publication of the Harrow & Wealdstone Area Action Plan

Members should note that due to the timeframes involved in the Council reporting procedures that the Pre-submission version of the AAP is still very much a work in progress and is subject to further editing.

Legal Comments

The legal requirements for the preparation and consultation of Development Plan Documents are set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. A failure to comply with the statutory requirements may result in the AAP being found 'unsound' at the examination in public.

Environmental Screening

It is a statutory requirement that DPDs are subjected to a Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment. A Sustainability Appraisal has been undertaken and will be published for public consultation and comment alongside the AAP.

Financial Implications

The cost of preparing, publishing, and consulting on the AAP, alongside the other DPDs currently being prepared, is contained within the existing LDF budget.

Risk Management Implications

33 Risk included on Directorate risk register? Yes

34 Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	To meet the test of 'soundness' of DPDs are required to comply with the legal requirements for preparing and consulting on DPDs under the Planning and Compulsory Purchase Act.	Officers will seek to ensure compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for consultation. The LDF team will maintain a log that chronicles legal compliance of the DPDs as they progress towards examination and adoption.
Reform of the plan-making system	The Government has now implemented many of its reforms including the publication, following consultation, of a new National Planning Policy Framework.	The recent publication of the NPPF has enabled the resulting national policy position to be fully reflected in the DPD which it is intended to submit.
Inappropriate consultation responses	A real risk with consultation on the DPDs is that consultees will make representations in respect of matters that have already been dealt	The DPD is clear that their purpose is to give effect to the London Plan and Core Strategy, including the agreed spatial strategy, which includes the broad distribution and quantum of development to be accommodated, as well as the strategic objectives

	with through the Core Strategy and are therefore not up for further debate.	regarding specific types of land use, including employment and open space.
Resourcing	The AAP is being prepared and published in tandem with other DPDs. There is a risk that at key stages in the plan making process, resources in the LDF team may not be sufficient to maintain the timetable agreed in the revised LDS.	Officers will monitor the workload in respect of the three DPDs being prepared and will seek to manage peaks or crunch points in the process. However, the workload associated with any one DPD is dependant on the level of community interest, number of responses received to consultation and the complexity of the matters raised. Where necessary, additional staff resources may need to be drafted in for short periods. This will be done in consultation with the Director of Planning and seek to give opportunities to those within the department who may wish to gain policy experience.

Equalities implications

35 Was an Equality Impact Assessment carried out? Yes and will made available to view on the Council website at the time the documents are published for public consultation.

Corporate Priorities

37. The AAP will help to deliver the following emerging corporate priorities:

- **Keeping neighbourhoods clean, green and safe:** by promoting a better quality built environment and public spaces, and considering options for enhancing green infrastructure and access to open spaces.
- **United and involved communities - a Council that listens and leads:** Engagement with the community and others is at the heart of the LDF process. The Area Action Plan, in particular, responds to the community's concerns about the state of Harrow town centre and seeks to ensure that development and growth within the area takes account of the priorities and preferences of residents as well as compliance with national and regional policy.
- **Supporting our Town centre, and local shopping centres and businesses:** The AAP will provide a positive and clear policy framework to guide the future development and growth within Harrow town centre, Wealdstone town centre, and Station Road, as well as securing new employment opportunities, appropriate investment in infrastructure, and much required environmental improvements.

Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input type="checkbox"/>	on behalf of the* Chief Financial Officer
Date: 28 May 2012		
Name: Abiodun Kolawole	<input type="checkbox"/>	on behalf of the* Monitoring Officer
Date: 28 May 2012		

Section 4 - Contact Details and Background Papers

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

Background Papers: Harrow and Wealdstone Area Action Plan:
Preferred Option Consultation document
Issues and Options Consultation document
LDF Report of December 2011

**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE**

Date of Meeting:	12 th June 2012
Subject:	Pre-Submission Development Management Policies DPD
Responsible Officer:	Andrew Trehern – Corporate Director of Place Shaping
Scrutiny Lead Member area:	Environment and Enterprise
Exempt:	No
Enclosures:	Schedule and Development Management Policies DPD (Due to the size of this document it has been circulated to Members of the Committee only and can be viewed on the Council's website)

Section 1 – Summary and Recommendations

This report summarises the changes that have been made to the Development Management Policies DPD to prepare it for pre-submission consultation and submission to the Planning Inspectorate for Examination in Public.

Recommendations:

The Committee is requested to consider and comment on the pre-submission version of the Development Management DPD which is to be reported to Cabinet at its meeting of 20th June 2012.

Section 2 – Report

A. Introduction

1. Harrow's Core Strategy was adopted on 16th February 2012 and comprises a spatial strategy for development to 2026 complimented by strategic planning policies covering thematic and neighbourhood issues. The London Plan (2011) also forms part of the development plan for Harrow and contains a comprehensive suite of 'planning decisions' policies on matters of relevance across the capital. For local development management policies, however, Harrow continues to rely on the saved provisions of the Unitary Development Plan (2004).

2. It is a corporate priority to prepare a new Development Management Policies development plan document (DPD), alongside other DPDs, to give effect to and support the Core Strategy. A draft suite of 'preferred option' development management policies was published for consultation during May and June last year, and the outcome of this consultation was reported to the LDF Panel on 19th July 2011. The focus of the LDF team during the second half of the year was the Core Strategy Examination in Public.

3. Annex 1 of the recently published National Planning Policy Framework (NPPF) gives 12 months for decision takers to give full weight to existing development plan policies beyond which they should be given due weight according to their consistency with the NPPF. In view of this deadline, and the age of the Harrow Unitary Development Plan, there is now a pressing need to progress the Development Management Policies DPD through the development plan process to adoption early next year.

4. This report introduces the 'pre-submission' Development Management Policies DPD and explains how its preparation has responded to last year's consultation, the adoption of the replacement London Plan (July 2011) and Harrow's Core Strategy (February 2012), as well as the recent publication of the NPPF.

B. Options Considered

5. In view of the Council's commitment, set out in Harrow's Local Development Scheme (LDS) and corporate priorities, to prepare a Development Management Policies DPD, and the local policy vacuum that would open up if the Unitary Development Plan saved policies are not replaced, the option not to progress with the preparation of the DPD can be discounted.

6. In terms of policy content, the 2011 consultation draft Development Management Policies DPD represented the Council's 'preferred option' and included some possible alternative approaches, although in many policy areas the strong direction given by national policy and the London Plan mean that there are no realistic alternatives. The 'pre-submission' Development Management Policies DPD has been prepared taking account of responses to the 2011 'preferred option' consultation document.

C. Pre-Submission Development Management Policies DPD

7. The pre-submission Development Management Policies DPD will be published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (previously 'Regulation 27'). This represents the final stage of consultation, being the version of the DPD that it is intended to submit for Examination in Public, and requires consultees to consider whether the plan meets legal requirements and is 'sound'. The tests of soundness are explained later in this report (see 'Next steps').

8. The schedule attached to this report sets out in detail how the pre-submission Development Management Policies DPD addresses the responses received during the preferred option consultation. The preparation of the pre-submission document has also been informed by strategic policy documents that have been adopted in the period since the 2011 consultation; namely:

- the National Planning Policy Framework (NPPF);
- the London Plan; and
- the Harrow Core Strategy.

9. The following paragraphs summarise and explain the main policy changes by chapter:

Character and Amenity

10. This chapter contains criteria based policies for the design & layout of development, the protection of locally designated views, and for the management of shopfront and advertisement applications. A separate policy to deal specifically with the application of Lifetime Neighbourhoods principles has been added in response to the London Plan (various policies) and Core Strategy Policy CS1(E). The policy relating to the Borough's Areas of Special Character (ASC) has been imported into this chapter from the conservation and heritage chapter, reflecting the principal function of this policy as a local landscape/character designation rather than a heritage asset.

11. Policy 1 (*Achieving a High Standard of Development*) has been substantially revised to provide more comprehensive criteria for design and layout considerations and privacy and amenity. This responds in particular to Core Strategy Policy CS1(B) and the need to ensure comprehensive replacement policy criteria for the design and layout of development.

12. Policy 3 (*Protected Views and Vistas*) has been substantially revised to reflect London Plan policies 7.11 and 7.12, the London View Management Framework and the recently completed Harrow Views Assessment, which forms an addition to the evidence base.

13. Minor changes to wording and criteria of policies 4 (*Shopfronts and Signs*) and 5 (*Advertisements*) have been made to improve their application. Policy 6 (*Areas of Special Character*) has been amended to provide a clear statement against substantial harm, in response to consultee comments, and to provide criteria which more accurately represent the special characteristics of the designated areas.

Conservation and Heritage

14. This chapter contains policies for the Borough's designated and non-designated heritage assets. Designated heritage assets comprise listed buildings, conservation areas, scheduled ancient monuments and registered parks and gardens. Non-designated heritage assets comprise locally listed buildings, archaeological priority areas and locally listed parks and gardens. As noted above, the Area of Special Character policy has been exported to the Character and Amenity chapter.

15. Policy 7 (*All Heritage Assets*) has been retained as a single, comprehensive policy of principles for all heritage assets but has been revised in response to consultation responses and the NPPF. Support was received for the policy's enabling development provisions, but these have been separated to form a specific new policy (Policy 8) and revised, in line with the NPPF, to deal with impacts and significance.

16. Policy 9 (*Conservation Areas*) and 10 (*Listed Buildings*) continue to provide specific, detailed criteria in relation to these designated assets, but have been revised in response to consultee comments to clearly state the substantial weight that will be afforded to their protection. The criteria have been organised and amplified to set out how preservation and enhancement of assets will be achieved.

17. In response to consultee comments a new policy (Policy 11) has been introduced to manage development affecting locally listed buildings. Similarly, in response to comments, archaeology policies have been re-ordered to provide a logical progression – Policy 12 (*Scheduled Ancient Monuments*)

and Policy 13 (*Archaeology*) – and have been substantially re-written to provide ensure appropriate levels of protection, consistent with the NPPF.

18. As with listed buildings, Policy 14 (*Nationally Registered Historic Parks and Gardens*) has been revised in response to consultee comments to underscore the presumption against harm or loss, and a new separate policy (Policy 15) has been added to deal specifically with locally listed sites.

Environmental Sustainability

19. This chapter gives effect to the Core Strategy by setting out the detailed, local requirements for the mitigation of flood risk and for sustainable building design.

20. Policies 16 (*Managing Flood Risk*) and 17 (*On Site Water Management and Attenuation*) have been substantially revised, in light of consultee comments and the policy recommendations of new evidence base documents¹. They now include design and layout criteria for sites at risk of flooding, a presumption against the loss of undeveloped floodplain, and afford substantial weight to the achievement of Greenfield run off rates.

21. Policy 18 (*Protection and Enhancement of River Corridors and Watercourses*) has been substantially revised to clarify the circumstances in which it will be applied, and to provide increased flexibility in the requirements for undeveloped buffer zones. The requirements for river restoration, previously in a separate policy, are now included in this policy and again flexibility has been introduced to allow for financial contributions in lieu of river restoration in some circumstances. These changes respond to consultee comments.

22. The preferred option policy on resource efficiency and environmental standards has been replaced by three new policies: Policy 19 (*Sustainable Design and Layout*); Policy 20 (*Decentralised Energy Systems*); and Policy 21 (*Renewable Energy Technology*). This is to ensure that local policies reflect the LDF preparation requirements of the London Plan² and the commitment given in Core Strategy Policy CS1(T) to bring forward policies which compliment those in the London Plan in respect of climate change.

23. Policy 22 (*Prevention and Remediation of Contaminated Land*) has been amended to set out the circumstances in which a risk assessment will be required, in response to consultee comments, and to give effect to such

¹ Specifically, the Level 2 Strategic Flood Risk Assessment and Harrow's Surface Water Management Plan.

² In particular: Policy 5.3 *Sustainable Design and Construction*; Policy 5.5 *Decentralised Energy Networks*; and Policy 5.7 *Renewable Energy*.

assessments in the decision making process. The policy has also been updated to reflect the NPPF.

24. In response to consultee comments and the NPPF, the preferred option policy on non-native species management has been deleted. This is because such matters are adequately controlled through the requirements of other, dedicated legislation.

Green Belt, Metropolitan Open Land and Biodiversity

25. Policies for the control of development in the Green Belt are provided in the NPPF and the London Plan. The London Plan also applies an equivalent approach to development in Metropolitan Open Land. This introductory text to this chapter has been substantially amended to signpost these provisions. The chapter goes on to provide local policies where these are needed to supplement the NPPF and London Plan, and to deal with local open space, biodiversity and landscape matters.

26. Policy 23 (*Redevelopment of Previously-Developed Sites within the Green Belt and Metropolitan Open Land*) has been substantially amended to reflect revised national policy in the NPPF and to ensure that there are robust, local criteria for the management of development proposals in these locations. The reasoned justification to the policy has been expanded to restore some of the detailed provisions that were in the PPG 2 annex but have not been reproduced as part of the NPPF.

27. A new policy (Policy 24) has been introduced on the use of Green Belt and Metropolitan Open Land. This responds to the NPPF, which states that local authorities should plan for the beneficial use of the Green Belt, and will ensure that existing UDP policies on uses are appropriately replaced.

28. Harrow's Core Strategy justifies a continuing presumption against the loss of open space, but allows for ancillary development (such as sport pavilions) where this is needed to enable proper functioning of the space. Pursuant to this approach, Policy 25 (*Protection of Open Space*) has been amended to provide tight criteria for reconfiguration, ancillary development and the use of existing ancillary of buildings.

29. The Core Strategy also seeks new open space to support growth across the Borough. New Policy 26 (*Provision of New Open Space*) gives effect to the requirement in respect of major residential development proposals.

30. Following consultation comments Policy 27 (*Protection of Biodiversity and Access to Nature*) and Policy 28 (*Enhancement of Biodiversity and Access to Nature*) provide strengthened criteria and give effect to Harrow's Biodiversity Action Plan. These policies relate to all biodiversity within the

Borough, and consequently the preferred option policies relating to sites of nature conservation importance and areas with features of importance are unnecessary and have been deleted.

31. As with non-native species (above), sites of special scientific interest (SSSI) are protected by dedicated legislation. The preferred option policy relating to SSSIs has therefore been deleted.

32. Policies on sport, recreation and floodlighting are now contained in the community infrastructure chapter. Separate policies on allotments and cemeteries are considered unnecessary as these form part of local open space protected by Policy 25, and their enhancement is unlikely to be delivered through development management. A new policy on trees and landscaping has been introduced to ensure that existing UDP provisions are appropriately replaced.

Housing

33. Strategic housing policies are contained in the London Plan and Harrow's Core Strategy. The introductory text this chapter has therefore been amended to clearly signpost these provisions, leaving the policies in this chapter to focus on local, qualitative aspects of housing development.

34. Policy 32 (*Housing Mix*) is a new policy to give effect to a housing mix which it is intended to set out in a Planning Obligations SPD. The provisions give effect to Core Strategy Policy CS1(I) and replace the preferred option 'new housing' policy which is considered superfluous in light of the adopted spatial strategy.

35. New policies have been introduced to provide criteria for conversions of offices and the conversion of houses to smaller units (Policy 33). These respond to the Core Strategy and ensure that existing UDP provisions are appropriately replaced.

36. A new policy (Policy 34) has also been introduced to provide criteria for the consideration of amenity space provision. Again this responds to the Core Strategy and ensures that existing UDP provisions are appropriately replaced.

37. Policies 36 (*Children and Young People's Play Facilities*), 37 (*Sheltered Housing, Care Homes and Extra Care Housing*) and 38 (*Large Houses in Multiple Occupation and Hostels*) have been retained with minor changes in response to consultee comments. These include clarification that play facilities will only be sought from developments involving a net increase in child yield, and the extension of Policy 37 to include extra care housing.

Employment and Economic Development

38. This chapter sets out policies for the management of employment land supply and for supporting sustainable economic development in the Borough.

39. The Core Strategy recognises that there is a modest surplus of employment land in the Borough and sets out a sequential approach for the release of sites. Policies in this chapter have been substantially revised to achieve greater consistency with the Core Strategy. Policy 39 (*Managing Land Supply: Industrial and Business Use Land and Floorspace*) provides criteria for release and amplifies the sequential approach. Policy 40 (*Managing Land Supply: Town Centre Offices and Northolt Road*) make equivalent provisions for the management of office space supply.

40. New Policy 41 (*Economic Activities and Development*) provides support for economic development within business and industrial use areas, and for comprehensive redevelopment of estates. Policy 42 (*Working at Home*) continues to support appropriate home working activities and, in response to consultee comments, has been amended to require the incorporation of space for home working within major new residential development.

41. Policy 43 (*Hotel and Tourism Development*) has been amended to ensure that hotel development is inclusive to all and provides a proportion of wheelchair accessible bedrooms. This reflects the London Plan and consultee comments. An additional requirement for Travel Plans with major hotel proposals, and criteria for the consideration of guest house and B&B proposals, have been included to ensure that existing UDP provisions are appropriately replaced.

42. In response to consultee comments Policy 44 (*Loss of Public Houses*) has been amended to limit application of the policy to purpose-built pubs, and to include evening economy activities as being appropriate alternative uses for these premises.

Town Centres and Retail Development

43. This chapter sets out the policies for town centre development and changes of use. The objective of the policies is to maintain and improve the vitality and viability of town centres.

44. Policy 45 (*New Town Centre Development*) is a new policy to give effect to the London Plan and Core Strategy by directing town centre development to town centre sites, and to set out strict criteria for the consideration of out of town proposals.

45. Policies 46 (*Primary Shopping Frontages*), 47 (*Secondary and Designated Shopping Frontages*) and 48 (*Other Town Centre Frontages and Neighbourhood Parades*) have been amended to improve clarity and, in response to consultee comments, increase flexibility. Specifically, they allow for proposals that would breach the proportion of non-retail frontage permitted within a centre to be approved if the proposal would, nonetheless, contribute to the centre's vitality and viability.

46. Policy 49 (*Vacant Shops in Town Centres and Neighbourhood Parades*) is a new policy setting out criteria for the use of shops in centres with a long-term vacancy problem. This has been introduced to ensure that existing UDP provisions are appropriately replaced.

47. Policy 50 (*Mixed Use Development in Town Centres*) has been amended, in response to consultee comments, to provide a positive context and supporting criteria for mixed use proposals.

48. Policy 51 (*Evening Economy*) has been simplified, by focusing on impacts, to allow greater flexibility for proposals that are appropriate to the centre in which they are located.

Transport and Waste

49. This chapter sets out the local policy requirements of development in relation to transport and waste matters.

50. Policy 52 (*Parking Standards*) has been substantially revised in response to consultee comments and the London Plan. However the broad approach, of applying London Plan standards, remains. Flexibility has been built in for the consideration of proposals that would involve levels of provision not consistent with the London Plan, and criteria for car free development and car clubs have been amplified/clarified. An additional provision deals with the design and layout of parking areas.

51. To reflect the provisions of the Core Strategy a new policy (Policy 53) has been introduced to specify the requirements for transport assessments and to give effect to them in the decision making process. A further new policy (Policy 54) deals with the servicing requirements of new development, and has been introduced to ensure that existing UDP provisions are appropriately replaced.

52. Policy 55 (*Waste Management*) has been amended to amplify the requirements for on-site waste management in new development. In response to consultee comments, the policy now also requires major development proposals to provide a site waste management plan.

Community and Infrastructure

53. This chapter sets out policies for the protection of existing, and the provision of new, community, sport and educational facilities.

54. Policy 56 (*New Community, Sport and Education Facilities*) has been amended to allow for the refurbishment and re-use of existing premises, and to set out criteria for the provision of new facilities. In response to consultees, the policy now also seeks community access to new educational and indoor sport development. The preferred option policy on the use of offices as education and training centres has been deleted (this had been located in the Employment and Economic Development chapter) and new criteria to deal with the impact of community and education uses in offices has been included in this policy.

55. New Policy 57 (*Retention of Existing Community, Sport and Education Facilities*) and 58 (*Enhancing Outdoor Sports Facilities*) provide criteria which seek to control the loss of, and support the enhancement of, existing facilities. This includes policy relating to floodlighting proposals. These policies have been introduced to ensure that existing UDP provisions are appropriately replaced, and to reflect the NPPF.

Telecommunications

56. This chapter contains one policy (Policy 59) dealing with proposals for telecommunications development. In response to consultee comments, the policy and the NPPF, the policy has been amended to provide positive criteria for the consideration of proposals, and the consultation requirements of the Code of Best Practice have been moved from the policy into the reasoned justification text. The introductory text to the chapter has also been amended to give greater recognition to the importance and potential future growth of the telecommunications sector.

Implementation, Resources and Monitoring

57. This chapter sets out policy on the use of Planning Obligations (Policy 60) and the use of the Council's enforcement powers (Policy 61). Policy 60 and the associated reasoned justification has been substantially amended to reflect the more focused role of Planning Obligations, following the adoption of a Harrow Community Infrastructure Levy. Minor amendments to Policy 61 clarify the approach to enforcement action, and the reasoned justification now includes reference to Harrow's new enforcement policy.

D. Compliance with tests for “soundness”

58. The pre-submission consultation and Examination in Public will focus on the tests of soundness set out in the NPPF. To be a sound plan, the DPD must be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

59. In relation to each of these tests:

Positively Prepared

60. The NPPF states that plans should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.

61. The Development Management Policies DPD gives effect to the London Plan and the Core Strategy which set out the Borough’s development requirements and, in the case of the Core Strategy, was informed by a local infrastructure delivery plan.

Justified

62. The NPPF states that the plan should be the most appropriate strategy when considered against the reasonable alternatives.

63. The evidence base underpinning the Core Strategy also justifies the provisions of the Development Management Policies DPD. The policies represent the most appropriate local response to the London Plan and the Core Strategy policies.

Effective

64. The NPPF states that the plan should be deliverable over its plan period and based on effective joint working on cross boundary matters.

65. The policies have been drafted to provide positive support for appropriate development and to focus on impacts that need to be managed.

Consistent with national policy

66. The Development Management Policies DPD has been revised to ensure that it complies with the recently published NPPF, as well as taking on board consultee comments wherever possible.

E. Next Steps

67. Subject to Cabinet and Full Council approval, the Development Management Policies DPD will be published for pre-submission public consultation in accordance with Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement), for a six week period. The pre-submission consultation is scheduled to take place during July and August 2012. Following the consultation, the LDF team will consider all representations received and if necessary produce and consult upon any minor modifications arising from that consultation. It is anticipated that the DPD will be submitted to the Planning Inspectorate in September and that Examination in Public will take place during December. This programme should enable adoption of the DPD to take place by April 2013.

F. Further Editorial Requirements for the Pre-submission Publication of the Development Management Policies DPD

68. Members should note that due to the timeframes involved in the Council reporting procedures that the submission version of the Development Management Policies DPD is still very much a work in progress and is subject to further editing.

G. Legal Comments

69. The legal requirements for the preparation and consultation on Development Plan Documents are set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. A failure to comply with the statutory requirements may result in the DPD being found 'unsound' at the examination in public.

H. Environmental Screening

70. It is a statutory requirement that DPDs are subjected to a Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment. A Sustainability Appraisal has been undertaken and will be published for public consultation and comment alongside the DPD.

I. Financial Implications

71. The cost of preparing, publishing and consulting upon the Development Management Policies DPD, Site Allocations DPD and Harrow & Wealdstone Area Action Plan, are provided-for by LDF budget together with a dedicated allocation from Planning Delivery Grant (PDG) funds as set out in the Council's Medium Term Financial Strategy. The time table for progression of

the three documents has been deliberately co-ordinated to maximise savings associated with simultaneous consultation, submission and Examination in Public.

J. Risk Management Implications

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	To meet the test of 'soundness' of DPDs are required to comply with the legal requirements for preparing and consulting on DPDs under the Planning and Compulsory Purchase Act.	Officers will seek to ensure compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for consultation. The LDF team will maintain a log that chronicles legal compliance of the DPDs as they progress towards examination and adoption.
Reform of the plan-making system	The Government has now implemented many of its reforms including the publication, following consultation, of a new National Planning Policy Framework.	The recent publication of the NPPF has enabled the resulting national policy position to be fully reflected in the DPD which it is intended to submit.
Inappropriate consultation responses	A real risk with consultation on the DPDs is that consultees will make representations in respect of matters that have already been dealt with through the Core Strategy and are therefore not up for further debate.	The DPD is clear that their purpose is to give effect to the Core Strategy, including the agreed spatial strategy, which includes the broad distribution and quantum of development to be accommodated, as well as the strategic objectives regarding the safeguarding of specific types of land use, including employment and open space.
Resourcing	The DPD is being prepared and published in tandem. There is a risk that at key stages in the plan making process, resources in the LDF team may not be sufficient to maintain the timetable agreed in	Officers will monitor the workload in respect of the three DPDs being prepared and will seek to manage peaks or crunch points in the process. However, the workload associated with any one DPD is dependant on the level of community interest, number of responses received to consultation and the complexity of the

	the revised LDS.	matters raised. Where necessary, additional staff resources may need to be drafted in for short periods. This will be done in consultation with the Director of Planning and seek to give opportunities to those within the department who may wish to gain policy experience.
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K. Equalities implications

Was an Equality Impact Assessment carried out?

72. An equalities impact assessment will be undertaken of the three DPDs. This will build on the previous EQIA prepared for the Core Strategy and will be made available to view on the Council website at the time the documents are published for public consultation.

L. Corporate Priorities

73. The DPD will help to deliver the following corporate priorities:

- **Keeping neighbourhoods clean, green and safe:** by promoting a better quality built environment and public spaces, and considering options for enhancing green infrastructure and access to open spaces.
- **United and involved communities - a Council that listens and leads:** Engagement with the community and others is at the heart of the LDF process. The Development Management Policies DPD responds to the comments received during the 2011 'preferred option' consultation and, by giving effect to the Core Strategy, reflects the many formal and informal stages of consultation undertaken during the preparation of that document.
- **Supporting our Town centre, and local shopping centres and businesses:** The the DPD will provide a positive and clear policy framework to guide the future development and growth within town centres and local parades, as well as securing appropriate investment in infrastructure and required environmental improvement.

Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the* Chief Financial Officer
Date: 28 May 2012		
Name: Abiodun Kolawole	<input checked="" type="checkbox"/>	on behalf of the* Monitoring Officer
Date: 24 May 2012		

Section 4 - Contact Details and Background Papers

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

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**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE**

Date of Meeting:	12 th June 2012
Subject:	Pre-Submission Site Allocations DPD
Responsible Officer:	Andrew Trehern – Corporate Director of Place Shaping
Scrutiny Lead Member area:	Environment and Enterprise
Exempt:	No
Enclosures:	Schedule and Site Allocations DPD - (Due to the size of this document it has been circulated to Members of the Committee only and can be viewed on the Council's website)

Section 1 – Summary and Recommendations

This report summarises the changes that have been made to the Site Allocations DPD to prepare it for pre-submission consultation and submission to the Planning Inspectorate for Examination in Public.

Recommendations:

The Committee is requested to consider and comment on the pre-submission version of the Site Allocations DPD which is to be reported to Cabinet at its meeting of 20th June 2012.

Section 2 – Report

A. Introduction

1. Harrow's Core Strategy was adopted on 16th February 2012 and comprises a spatial strategy for growth for the Borough as a whole to provide a minimum of 6,050 new homes¹ and 4,000 jobs over the plan period 2009 to 2026. A major component of the strategy for the delivery of growth is the designation of the Harrow & Wealdstone Intensification Area, to accommodate at least 2,800 new homes and 3,000 jobs. This leaves a requirement to find land for the balance of (at least) 3,250 homes and 1,000 jobs throughout the rest of the Borough.

2. The Core Strategy gives a clear commitment to the protection of all of the Borough's open space and gardens. It therefore sets out to meet development needs on previously-developed land within town centres and in other locations with good public transport accessibility.

3. It is a corporate priority to prepare a Site Allocations development plan document (DPD), alongside other DPDs, to give effect to and support the Core Strategy. A draft compendium of 'preferred option' site allocations was published for consultation during May and June last year, and the outcome of this consultation was reported to the LDF Panel on 19th July 2011. The focus of the LDF team during the second half of the year was the Core Strategy Examination in Public.

4. The recently published National Planning Policy Framework (NPPF) reaffirms the Government's commitment to a plan-led system, but places a clear expectation on local planning authorities to plan positively for objectively assessed growth and development needs. To underline, in particular, the importance that the Government attaches to housing delivery, the NPPF requires local authorities to maintain an annual, rolling five-year supply of deliverable housing sites with an additional 5 per cent (i.e. one year's supply) buffer, and penalises authorities who have historically underperformed against housing targets by increasing the buffer to 20 per cent. In view of the Government's commitment to growth and housing, and the lack of sufficient up-to-date allocated sites on the Harrow proposals map, there is now a pressing need to progress the Site Allocations DPD through the development plan process to adoption next year.

5. It should be noted that the recently published Town and Country Planning (Local Planning) (England) Regulations (2012) applies new terminology to what has traditionally be known as the proposals map. The 'adopted policies map' will replace the Harrow proposals map and will identify the development sites identified in the Site Allocations DPD as well as illustrating geographically the application of policies.

¹ This incorporates the London Plan (2011) annualised target of 350 homes per annum rolled forward to 2026.

6. This report introduces the 'pre-submission' Site Allocations DPD and explains how its preparation has responded to last year's consultation and the adoption of Harrow's Core Strategy (February 2012).

B. Options Considered

7. In view of the Council's commitment, set out in Harrow's Local Development Scheme (LDS) and corporate priorities, to prepare a Site Allocations DPD, and the implications in terms of national planning policy and Core Strategy commitments of not identifying sites to meet the Borough's development needs, the option not to progress with the preparation of the DPD can be discounted.

8. Broad, strategic options for accommodating growth within the Borough were presented and consulted-upon through the preparation of the Core Strategy. The adopted Core Strategy gives a clear undertaking to meet all of the Borough's development needs on previously developed land. Therefore, in terms of sites proposed to be allocated for development, the 2011 consultation draft Site Allocations DPD represented the Council's 'preferred option' by identifying only previously-developed sites which, in the opinion of officers, are deliverable over the plan period and consistent with the objectives of the Core Strategy. The 2011 draft also illustrated proposed changes to retail, employment and open space designations that will require formal amendment to the adopted policies map. The 'pre-submission' Site Allocations DPD has been prepared taking account of responses to the 2011 'preferred option' consultation document.

C. Pre-Submission Site Allocations DPD

9. The pre-submission Site Allocations DPD will be published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (previously 'Regulation 27'). This represents the final stage of consultation, being the version of the DPD that it is intended to submit for Examination in Public, and requires consultees to consider whether the plan meets legal requirements and is 'sound'. The tests of soundness are explained later in this report (see 'Next steps'). It should be noted that site allocations within the Harrow & Wealdstone Intensification Area will be set out in the Area Action Plan and are therefore not included in the Site Allocations DPD.

10. The schedule attached to this report sets out in detail how the pre-submission Site Allocations DPD addresses the responses received during the preferred option consultation. The preparation of the pre-submission document has also been informed by strategic policy documents that have been adopted in the period since the 2011 consultation; namely:

- the National Planning Policy Framework (NPPF);
- the London Plan; and
- the Harrow Core Strategy.

11. The following paragraphs summarise and explain the main changes to the site allocations DPD by chapter:

Retail

12. The retail chapter of the 2011 'preferred option' DPD contained the following proposed changes to the adopted policies map:

- modifications to shopping frontages within South Harrow, North Harrow, Pinner and Stanmore district centres, in response to recommendations contained within the Harrow Retail Study (2009) and to correct existing omissions on the proposal map; and
- geographic representation of the neighbourhood parades identified in the (then emerging) Core Strategy; and
- identification of primary shopping areas within South Harrow, Rayners Lane, Pinner and Stanmore district centres, to comply with national policy in (then extant) PPS 4.

13. Few representations were received during the preferred option consultation to the retail chapter. The pre-submission DPD continues to propose the recommended changes to shopping frontages and the identification of the (now adopted) Core Strategy neighbourhood parades. The NPPF continues to require local planning authorities to define the extent of town centres and primary shopping areas. No justification for amending the boundary of any town centre (outside of the AAP area) has emerged, but the pre-submission DPD continues to propose primary shopping areas in the centres identified².

14. The NPPF advises local planning authorities to ensure that retail and other town centre development needs are not compromised by limited site availability, and therefore requires a suitable range of in centre and (where appropriate) edge of centre sites to be allocated. The focus for substantial new retail and leisure development will continue to be Harrow town centre, consistent with the Core Strategy and the London Plan town centre hierarchy. However, the pre-submission Site Allocations DPD now includes sites suitable for retail development within other town centres, based upon the recommendations³ of the Harrow Retail Study (2009), to ensure a suitable choice of sequentially preferable retail development sites. They are:

- Land between High Street and Love Lane, **within** Pinner district centre (0.31 ha);
- Single storey units south of Rayners Lane station, Alexandra Avenue, **within** Rayners lane district centre (0.11 ha);
- VB & Sons, Kenton Road/Honeypot Lane, **edge** of Kingsbury district centre (0.18 ha);
- Harrow West Conservative Association and Hallmark Cars, Village Way, **edge** of Rayners Lane district centre (0.19 ha);
- Roxeth Library and clinic, Northolt Road, **edge** of centre South Harrow district centre (0.165 ha); and

² Other town centres are not considered to have significant multiple retail and other roles, and therefore it is not necessary to identify a primary shopping area within them.

³ Only those sites rated in the Study as having a reasonable or good prospect of development within the plan period. Those rated reasonable/poor and poor have been excluded.

- North Harrow Methodist Church, Pinner Road, **edge** of North Harrow district centre (0.34 ha).

15. In the case of the High Street/Love Lane and Alexandra Avenue sites, both are located within the proposed primary shopping areas of the relevant centres. In the cases of the sites at Village Way, Northolt Road and Kenton Road/Honeypot Lane, these are classed as edge of centre being within 300 metres of a proposed primary shopping area (in the case of Rayners Lane and South Harrow centres) or of a designated primary shopping frontage (in the case of Kingsbury centre, within the London Borough of Brent). The Site Allocations DPD proposes to downgrade all frontages within North Harrow district centre to secondary frontage status; the site at Pinner Road would be within 300m of the nearest adjacent secondary frontage.

16. All of the above sites, although allocated principally for retail development, will be suitable for a mix of uses which includes residential. Therefore each site has been allocated a potential housing capacity figure based upon the London Plan sustainable residential quality density matrix. For consistency with this approach the Anmer Lodge and Stanmore car park site, which had been included in the housing chapter of the preferred option document, has been moved into this chapter of the Site Allocations DPD. However the size/circumstances⁴ of the Anmer Lodge/Stanmore car park site are such that it will contain a substantial element of housing in addition to the retail/town centre uses proposed.

Employment

17. The employment chapter of the 2011 'preferred option' DPD contained the following proposed changes to the adopted policies map:

- modification of the Honeypot Lane industrial and business use area designation to exclude the extent of the Stanmore Place residential development;
- modification of the Brember Road industrial and business use area designation to exclude the extent of The Arc residential development and to correct the boundary in relation to the South Harrow retail park (Waitrose etc); and
- modification of the Northolt Road business use area to exclude 201-209 Northolt Road, which is located on the residential side of Northolt Road between Brooke Avenue and South Hill Avenue.

18. The north section of the Northolt Road business use area (between Waitrose retail park access and Shaftesbury Avenue) has been the subject of residential conversion/redevelopment schemes in recent years. The pre-submission Site Allocations DPD therefore also proposes to amend the extent of this section of the area to exclude Raebarn House, Templar House and Osbury Court.

19. The potential of office redevelopment to contribute to the provision of new office space and economic diversification through enabling residential use was explored at the Core Strategy's Examination in Public. In response to

⁴ Only the car park is within Stanmore district centre. The total site area is 0.67 hectares.

this (and associated modifications to the Core Strategy) officers propose the following allocations for employment-led mixed use redevelopment:

- Northolt Road business use area north⁵;
- Northolt Road business use area south;
- 415 Burnt Oak Broadway;
- 47-49 Burnt Oak Broadway; and
- 57-59 High Street, Edgware.

20. One consultee has proposed a specific revision to the Northolt Road business use area to exclude from the designation No. 142 Northolt Road (Bovis Lend Lease) on the grounds that the existing building is of poor quality and not attractive to the market, and that de-designation would be the best means of securing successful redevelopment. However, officers consider that Core Strategy objectives for the area would be more effectively met by retaining the site within the designation to allow for a mixed use development to contribute to economic as well as residential uses.

Housing

21. The housing chapter sets out those sites allocated solely or primarily for housing development. It should be noted that sites allocated in other chapters, particularly those relating to retail and employment development, include a housing capacity where the site is expressly identified as being suitable for a mix of uses which includes residential. Strategic previously-developed sites within the Green Belt, identified in a new chapter in the pre-submission DPD, also have housing capacity. These sites will therefore also contribute to housing supply but are not included in the housing chapter.

22. The 2011 'preferred option' DPD proposed to allocate 29 sites for housing development with a projected⁶ capacity to provide 1,369 homes.

23. The following additional sites were put forward by consultees for inclusion as housing sites in the pre-submission Site Allocations DPD:

- Lyon House/Equitable House, Lyon Road;
- Old Lyonians sports ground, Pinner View;
- 37-41 Palmerston Road, Wealdstone;
- Wickes House, Station Road; and
- Kenton Lane Farm, Belmont.

24. Of these sites, those at Lyon Road, Palmerston Road and Station Road fall within the Harrow & Wealdstone Intensification Area boundary and are therefore within the jurisdiction of the AAP rather than the Site Allocations DPD. The Old Lyonian's sports ground is designated open space and so its allocation for development would be at odds with the Core Strategy.

25. Kenton Lane Farm contains an area of designated open space and parts of the farm complex are listed. However, the open space is not currently

⁵ This replaces an allocation specific to Harrow Police Station that had been included in the preferred option document.

⁶ Calculated using the London Plan sustainable residential quality density matrix.

publicly accessible and a suitable scheme which both secures the future of the historic farm buildings and achieves public access to the open space (subject to no net loss of open space) would make a positive contribution to the delivery of Core Strategy objectives. Recognising the site constraints and the key objective for the site's development - to deliver additional public open space in this area - it is proposed allocate the site in the 'other' rather than the housing chapter of the Site Allocations DPD.

26. Many detailed representations were received in respect of the proposed housing sites in the preferred option document and these are individually dealt with in the schedule attached to this report. The following bullets highlight the main changes to the housing chapter arising from consultee comments:

- Rayners Lane Public House: the potential capacity of the site has been increased to 31 units (up from 20) to reflect recent planning decisions relating to the site, and the text amended to highlight the significance of the listed building.
- Harrow Arts Centre car park: this site has been removed from the housing chapter and is now allocated for arts and leisure uses to compliment the existing Arts Centre.
- Jubilee House: the site boundary has been extended to include two pairs of semi-detached dwellings to the south (in Merrion Avenue) which the consultee has advised are within the same ownership, enabling a more comprehensive redevelopment scheme to come forward. The site boundary has also been extended to the north to incorporate land within the ownership of another consultee.
- Canons Park Station car park: this is a new site promoted by a consultee for residential development.

27. The 'preferred option' DPD included 96 Greenford Road as a housing development site, and this has been carried forward into the pre-submission document but the site area has been increased to cover the full extent of the existing timber yard site and to give the correct address as 92-94 Greenford Road. Officers have also included the timber yard at 78-89 Greenford Road as a housing development site.

Strategic Previously-Developed Sites in the Green Belt and Metropolitan Open Land

28. This is a new chapter which did not appear in the preferred option document, and responds to the adopted Core Strategy, the NPPF and engagement between officers and Harrow School.

29. The Core Strategy identifies four, strategic previously developed sites within the Green Belt. They are:

- Bentley Priory;
- Royal National Orthopaedic Hospital;
- Wood Farm; and
- Harrow College (Harrow Weald).

30. All four sites are of strategic importance because their redevelopment will deliver public benefits. The allocation of these sites therefore gives effect to the Core Strategy and, together with Green Belt policy in the pre-submission Development Management Policies DPD, will ensure that their redevelopment delivers strategic benefits and enhancement of the Green Belt.

31. Following meetings with officers, the Harrow School burser has requested that part of the school estate within Metropolitan Open Land (MOL) at Harrow on the Hill be considered for inclusion as a strategic, previously-developed site within MOL. In view of changes to the NPPF and the London Plan position that the same level of protection should be given to MoL as to Green Belt, it is the opinion of officers that there is no policy obstacle to the designation of strategic previously developed sites in MOL. In the case of Harrow School, the sites identified are of strategic importance because their redevelopment will provide the opportunity to deliver public benefit in the form of community access to sport and open space facilities. This approach is consistent with the Core Strategy which gives commitments to support the continued operation of Harrow School and to work with landowners in the Harrow on the Hill sub area to support public access to sport and recreation facilities. At this stage there is no specific proposal for alterations to the school campus but, over the life of the plan, it is considered that there may be a case for managed change linked to a site specific planning brief/SPD. As with the Green Belt, policies will require redevelopment of strategic sites in MOL to maintain and enhance openness and visual amenity.

Open Spaces

32. The open spaces chapter includes details of open space not currently protected which it is proposed to designate, and a number of boundary amendments to existing open spaces, following the completion of Harrow's PPG 17 Study in 2010. The preferred option document also included the following major open space allocations:

- St. George's Playing Field, Pinner View (open space);
- Land rear of 121-255 Pinner Road (local nature reserve);
- Harrow Weald Park, Brookshill (open space);
- Glenthorne, Common Road (extension to Bentley Priory open space);
- and
- Prince Edward Playing Fields, Whitchurch Lane/Camrose Avenue (outdoor sports use).

33. In view of recent planning decisions affecting St. George's Playing Field this site has now been relocated to the 'other' chapter and allocated for public open space and enabling housing development. It should be noted however that this chapter also seeks to correct the boundary of the open space designation to take account of the approved development and the extent open space to the north of the site.

34. Consultee comments were largely supportive of the proposed open space allocations, with some amendments to the individual site commentaries suggested. In response to consultee comments it is proposed to designate an additional area of open space at the junction of The Grove and Rayners Lane, Pinner.

Biodiversity

35. The biodiversity chapter of the 2011 'preferred option' DPD contained a number of changes to sites designated for their biodiversity value in response to Harrow's Biodiversity Action Plan (2008) and upon the advice of Greenspace Information for Greater London (GIGL). Again, consultee comments were generally supportive and the following changes have been made to the pre-submission Site Allocations DPD:

- revisions to the boundary of the proposed new site of nature conservation importance at Hatch End Arts Centre, to encompass the route of the recently deculverted section of the River Pinn; and
- transfer the relevant parts of the Headstone Manor site of nature conservation importance to the AAP for designation in that DPD.

Other

36. The final chapter of the 2011 'preferred option' consultation document contained the following miscellaneous allocations:

- Whitchurch Playing Fields – for outdoor sports use and flood storage; and
- Belmont Clinic – for medical and community use.

37. Consultee comments supported the proposed allocation of Whitchurch Playing Fields, subject to flooding considerations. Following consultation in relation to the housing chapter, this chapter of the pre-submission Site Allocations DPD now also includes the Harrow Arts Centre site for arts and leisure uses.

38. Officers have amended the pre-submission DPD allocation in respect of St. George's Playing Field to reflect recent planning decisions and ensure that the approved public open space is delivered in the event of any future revised scheme. In response to the sites put forward by consultees (see commentary on the housing chapter above), the Kenton Lane Farm site is also now allocated in this chapter for enabling development to support the delivery of new public open space in the area, and to secure the future of heritage assets on the site.

39. Harrow's Core Strategy includes a commitment to provide 3 pitches for Gypsies and Travellers within the Borough and includes policy criteria for the consideration of new sites. No new sites have emerged or been proposed through the preferred option consultation. Therefore, to reflect the importance of the existing site in meeting the Borough's needs it is proposed to safeguard this as a Gypsy and Traveller site in the pre-submission Site Allocations DPD.

D. Compliance with tests for 'Soundness'

40. The pre-submission consultation and Examination in Public will focus on the tests of soundness set out in the NPPF. To be a sound plan, the DPD must be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

41. In relation to each of these tests:

Positively Prepared

42. The NPPF states that plans should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.

43. The Site Allocations DPD gives effect to the Core Strategy by allocating sufficient land to meet identified development needs over the plan period on previously developed land.

Justified

44. The NPPF states that the plan should be the most appropriate strategy when considered against the reasonable alternatives.

45. The evidence base underpinning the Core Strategy also justifies the allocations set out in the Site Allocations DPD. The allocations represent the most appropriate local response to the London Plan and the Core Strategy policies.

Effective

46. The NPPF states that the plan should be deliverable over its plan period and based on effective joint working on cross boundary matters.

47. The allocations have been drafted to ensure that there are deliverable sites which meet London Plan and Core Strategy objectives.

Consistent with national policy

48. The revised Site Allocations DPD takes into account the recently published NPPF, as well as responding to consultee comments wherever possible.

E. Next Steps

49. Subject to Cabinet and Full Council approval, the Site Allocations DPD will be published for pre-submission public consultation in accordance with Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement), for a six week period. The pre-submission consultation is scheduled to take place during July and August. Following the consultation, the LDF team will consider all representations received and if necessary produce and consult upon any minor modifications arising from that consultation. It is anticipated that the DPD will be submitted to the Planning Inspectorate in September and that Examination in Public will take place

during December. This programme should enable adoption of the DPD to take place by April 2013.

F. Further Editorial Requirements for the Pre-submission Publication of the Site Allocations DPD

68. Members should note that due to the timeframes involved in the Council reporting procedures that the submission version of the Site Allocations DPD is still very much a work in progress and is subject to further editing.

G. Legal Comments

69. The legal requirements for the preparation of and consultation on Development Plan Documents are set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. A failure to comply with the statutory requirements may result in the DPD being found 'unsound' at the examination in public.

H. Environmental Screening

70. It is a statutory requirement that DPDs are subjected to a Sustainability Appraisal incorporating the requirements of the Strategic Environmental Assessment. A Sustainability Appraisal has been undertaken and will be published for public consultation and comment alongside the DPD.

I. Financial Implications

71. The cost of preparing, publishing and consulting upon the Site Allocations DPD, Development Management Policies DPD and Harrow & Wealdstone Area Action Plan, are provided-for by LDF budget together with a dedicated allocation from Planning Delivery Grant (PDG) funds as set out in the Council's Medium Term Financial Strategy. The time table for progression of the three documents has been deliberately co-ordinated to maximise savings associated with simultaneous consultation, submission and Examination in Public.

J. Risk Management Implications

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	To meet the test of 'soundness' of DPDs are required to comply with the legal requirements for preparing and consulting	Officers will seek to ensure compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for

	on DPDs under the Planning and Compulsory Purchase Act.	consultation. The LDF team will maintain a log that chronicles legal compliance of the DPDs as they progress towards examination and adoption.
Reform of the plan-making system	The Government has now implemented many of its reforms including the publication, following consultation, of a new National Planning Policy Framework.	The recent publication of the NPPF has enabled the resulting national policy position to be fully reflected in the DPD which it is intended to submit.
Inappropriate consultation responses	A real risk with consultation on the DPDs is that consultees will make representations in respect of matters that have already been dealt with through the Core Strategy and are therefore not up for further debate.	The DPD is clear that their purpose is to give effect to the Core Strategy, including the agreed spatial strategy, which includes the broad distribution and quantum of development to be accommodated, as well as the strategic objectives regarding the safeguarding of specific types of land use, including employment and open space.
Resourcing	The DPD is being prepared and published in tandem. There is a risk that at key stages in the plan making process, resources in the LDF team may not be sufficient to maintain the timetable agreed in the revised LDS.	Officers will monitor the workload in respect of the three DPDs being prepared and will seek to manage peaks or crunch points in the process. However, the workload associated with any one DPD is dependant on the level of community interest, number of responses received to consultation and the complexity of the matters raised. Where necessary, additional staff resources may need to be drafted in for short periods. This will be done in consultation with the Director of Planning and seek to give opportunities to those within the department who may wish to gain policy experience.

K. Equalities implications

Was an Equality Impact Assessment carried out?

72. An equalities impact assessment will be undertaken of the three DPDs. This will build on the previous EQIA prepared for the Core Strategy and will be made available to view on the Council website at the time the documents are published for public consultation.

L. Corporate Priorities

73. The DPD will help to deliver the following corporate priorities:

- **Keeping neighbourhoods clean, green and safe:** by promoting a better quality built environment and public spaces, and considering options for enhancing green infrastructure and access to open spaces.
- **United and involved communities - a Council that listens and leads:** Engagement with the community and others is at the heart of the LDF process. The Site Allocations DPD responds to the comments received during the 2011 'preferred option' consultation and, by giving effect to the Core Strategy, reflects the many formal and informal stages of consultation undertaken during the preparation of that document.
- **Supporting our Town centre, and local shopping centres and businesses:** The DPD will provide a positive and clear policy framework to guide the future development and growth within town centres and local parades, as well as securing appropriate investment in infrastructure and required environmental improvement.

Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the* Chief Financial Officer
Date: 28 May 2012		
Name: Abiodun Kolawole	<input checked="" type="checkbox"/>	on behalf of the* Monitoring Officer
Date: 24 May 2012		

Section 4 - Contact Details and Background Papers

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

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**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE**

Date of Meeting:	12 June 2012
Subject:	Revised Local Development Scheme
Responsible Officer:	Andrew Trehern, Corporate Director Place Shaping
Scrutiny Lead Member area:	Environment and Enterprise
Exempt:	No
Enclosures:	Appendix A – Revised Local Development Scheme (Due to the size of this document it has been circulated to Members of the Committee only and can be viewed on the Council’s website)

Section 1 – Summary and Recommendations

This report sets out the revised content and timetable for the LDF documents the Council is intending to prepare over the coming years. The revised Local Development Scheme is intended to replace the current outdated LDS.

Recommendations:

The Committee is requested to note the revised Local Development Scheme (LDS) at Appendix A

Section 2 – Report

The Local Development Scheme (LDS) is the Council's published timetable for preparing documents in its Local Development Framework (LDF). The LDF will guide the quantity, quality and spatial distribution of new development in Harrow, replacing the current Unitary Development Plan. The

completion of key LDF documents is a corporate priority for Place Shaping that will not only enable the Council to better control development in the Borough but will assist in the delivery of other corporate priorities relevant to the Directorate, including:

- securing inward investment through the development of key strategic sites, including the Kodak site;
- ensure Harrow town centre fulfils its potential as a thriving and distinctive centre;
- securing and sustaining the vitality and viability of our District and Local Centres;
- enhancing the quality and capacity of public transport in Harrow; and
- developing a green infrastructure grid for the Borough to support future investment in public realm, spaces and parks.

The LDS is important because it is intended to keep the public and other stakeholders informed of the LDF documents the Council is intending to prepare and when, and at what stage people/organisations can get involved in that process.

Current Situation

The Council's current LDS was adopted in January 2011. Since its publication, the Core Strategy DPD and the Residential Design Guide SPD have both been adopted. However, the timetable for preparing the remaining LDF documents has changed.

Changes to the project timetable for the Harrow & Wealdstone Area Action Plan are necessary to take account of the additional round of consultation undertaken on a Preferred Option document in January 2012 and the impact of this on the timeline for subsequent stages.

The Site Allocations DPD and the Development Management Policies DPD are programmed to be progressed in tandem the Area Action Plan, for reasons of cost and resource efficiency. The additional round of consultation on the Area Action Plan has therefore delayed the project timeline for these two documents. The changes to the revised LDS therefore seek to bring the timeline for the subsequent stages of all three DPDs back into alignment.

The preparation of the joint West London Waste Plan (WLWP) has been the subject of significant delays. The reasons for the delays are detailed in a separate report to this Committee agenda. Changes to the WLWP timetable are required to take account of the revised programme for this document which has been agreed by all six partner boroughs.

Other changes made to the LDS include an update to the list of LDF documents now adopted; an update to the ever increasing list of evidence base documents that underpin the LDF; and a general update to the text to note recent changes to planning legislation and the process for plan-making.

Members should note that the recent changes to planning legislation also affect the requirements for the LDS. The Planning Act 2008 removed the need for the LDS to include a list of the supplementary planning documents

the Council was intending to prepare. While the Localism Act 2011 removed the need for the LDS (and any revisions to it) to be submitted to the Secretary of State and the Mayor of London for approval before it could be formally adopted by the Council.

Implications of the Recommendation

Legal comments

Under section 15 of the Planning and Compulsory Purchase Act (2004) local planning authorities must prepare and maintain a Local Development Scheme (LDS) which must set out the documents that the Council will prepare as local development documents and the timetable for their preparation.

Financial Implications

The documents to be prepared under this LDS have been budgeted for, and are covered under existing LDF budgets. However, any reduction in funding over the LDS timetable will necessarily have an impact upon the timely production of these documents.

Performance Issues

There is no national or local performance indicator that deals specifically with plan making. Nevertheless, the purpose of the LDF is to plan for the future land use of the Borough, guiding the quantity, quality and spatial distribution of growth and development in Harrow. In preparing LDF documents, regard is had to the implementation of Council strategies alongside national and regional policy requirements and the findings from consultation and evidence base studies. Each document includes a detailed monitoring strategy that monitors the performance of individual policies and the delivery of strategic objectives. The results from monitoring are analysed and reported in the Annual Monitoring Report. This also includes monitoring of delivery against the LDS programme and timetable. The latest monitoring report is available on the Council website:

http://www.harrow.gov.uk/downloads/download/3217/harrow_annual_monitoring_report_2010-2011

With regard to the delivery of corporate priorities, this is further detailed at the end of this report.

Environmental Impact

The LDS does not in itself contain any policies or proposals. The consideration and assessment of environmental impacts are comprehensively dealt with through the requirement to undertake Sustainability Appraisal, incorporating Strategic Environmental Assessment, in the course of preparing Development Plan Documents but are not relevant to the LDS, which merely establishes the LDF timetable.

Risk Management Implications

Risk included on Directorate risk register? Yes

The “soundness” of DPDs – to be found sound, LDF documents are to comply with statutory process, government policy and be in general conformity with the London Plan. Since the last LDS was prepared, significant legislative changes have taken place and new national and regional planning frameworks have been published. In preparing Harrow’s LDF it will be necessary to ensure that Harrow’s documents continue to take account of changes as and when they occur to ensure that they remain applicable come adoption and implementation.

Committee process – The lead in times for key DPD’s is significant, and involves significant staff resource. Earlier attempts to revise the process to reduce the burden associated with the democratic process have proved unsuccessful. Officers will however continue to explore how greater flexibility in the political process can be achieved to ensure that members get sufficient opportunity to influence plans, while the lead in time for the political reporting processes are minimised. In some instances it may be necessary to hold additional meetings of LDF Panel or Full Council to ensure reporting timeframes and ultimately DPD milestones are met.

Evidence base – A key requirement of all DPDs the Council prepares is that they be based on a robust and up-to-date evidence base. Significant resource has been invested in compiling a robust evidence base in support of the LDF. Where necessary, this has required the Council to undertake a review of evidence base studies due to changing circumstances (e.g. to take account of the impact of the recession on employment and retail growth projections). However, if the timetable for preparing the LDF slips or is slowed, there is a risk that, by the time of submission, the evidence on which the document is based would be out of date. A further risk arises where reforms to the planning system are proposed, and prior to primary legislation being enacted, such changes are given effect through amendments to national planning policy. Such changes often result in requirements upon local planning authorities to prepare new studies to assess and address relevant national issues at the local level.

Neither of the above risks are new to planning policy, and the Council will need to manage the LDF timetable whilst ensuring the supporting evidence base remains as up-to-date and robust as is necessary.

Implementation and Delivery – For plans to be found ‘sound’ they must be considered to be deliverable. The implications of the current and going economic climate mean that many policies need to be more flexible in their application than some would want them to be, and that expectations will need to be lowered with regarding delivery targets or delivery timelines. Such implications will be managed through justification in the supporting text to policies but may also require other corporate plans and strategies to clearly articulate the reasons for this. As noted in the performance section of this report, the LDF policies are subject to monitoring and reporting and the policies can be reviewed to take account of changes in circumstances, including an improving economic outlook

Equalities implications

Was an Equality Impact Assessment carried out? No

The LDS merely establishes the programme and timetable for preparing LDF documents and therefore does not give rise to equalities impacts.

Corporate Priorities

The establishment of a new planning policy framework for the Borough will not only enable the Council to better control development but will assist in the delivery of the following corporate priorities:

- Keeping neighbourhoods clean, green and safe by preventing the loss of further open space; resisting development on garden land; implementing the Harrow Green Grid; and ensuring new development incorporates designing out crime principles.
- Supporting and protecting people who are most in need through securing affording housing, including supported accommodation and by securing new and enhances social and physical infrastructure;
- Supporting our town centre, our local shopping centres and businesses by promoting new development opportunities within our town centres and securing new business and employment through enabling development.

Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the* Chief Financial Officer
Date: 28 May 2012		
Name: Abiodun Kolawole	<input checked="" type="checkbox"/>	on behalf of the* Monitoring Officer
Date: 28 May 2012		

Section 4 - Contact Details and Background Papers

Contact: Matthew Paterson, Senior Professional Policy Planning, Development and Enterprise, phone 02087366082

Background Papers: Local Development Scheme (January 2011)
Previous LDF Panel, O&S, & Cabinet Reports

**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE**

Date of Meeting:	12 June 2012
Subject:	Revised Proposed West London Waste Plan: Pre-Submission Consultation document
Responsible Officer:	Andrew Trehern, Corporate Director Place Shaping
Scrutiny Lead Member area:	Environment and Enterprise
Exempt:	No
Enclosures:	Appendix A – Revised Proposed West London Waste Plan: Pre-Submission Consultation document (Due to the size of this document it has been circulated to Members of the Committee only and can be viewed on the Council’s website)

Section 1 – Summary and Recommendations

This report follows a previous report to the Overview and Scrutiny Committee which considered and recommended that Cabinet approve the proposed West London Waste Plan: Pre-Submission Consultation document subject to amendments. Following discussions between the partner boroughs, this report seeks agreement to a revised site designation to Harrow’s Depot site that overcomes the Council’s concerns to the policy wording of the draft Plan.

Recommendations:

The Committee is requested to:

1. Consider and comment on the revised West London Waste Plan: Pre-Submission Consultation document (attached at Appendix A) including the revision to the Harrow Council depot site designation.
2. Note that the revised West London Waste Plan: Pre-Submission

Consultation document will be recommended to Cabinet and the Full Council for an eight-week period of public consultation..

Reason: (For recommendation)

To enable the Council to make meaningful progress on the West London Waste Plan (WLWP) in order to meet targets set out in the London Plan 2011 and Planning Policy Statement 10, which is still extant.

The WLWP will in due course provide an up-to-date policy framework to assess planning applications for waste management facilities across the six West London boroughs: Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames. Planning applications for waste management facilities will also be assessed by each borough against their individual Local Plans, including local development management policies and any other material considerations.

Section 2 – Report

The proposed West London Waste Plan: Pre-Submission Consultation document was reported to this Committee, and subsequently to Cabinet, in December 2011. Cabinet recommended the document be approved for public consultation subject to amendments being made to ensure that any proposal by the Council to improve, enhance or intensify the depot site for depot uses would not be considered a departure from the Plan.

A meeting of the WLWP Steering Group, which comprises both officers and members, was then held on 24 January 2012 to discuss finalisation of the draft Plan. Whilst agreement was reached by the six Councils on the majority of the content, Harrow's amendments were not agreed.

The key objections to Harrow's amendments were that the changes were considered more than minor, and therefore unable to be dealt with through delegated authority; and that to allocate rather than safeguard the three new proposed waste sites could result in an under-provision of land required to meet West London's waste appointment target, and therefore could impact on the soundness of the Plan.

Given that the Plan cannot proceed to the public consultation unless the same version is agreed by all the boroughs, discussions continued to take place between the Councils to seek an amicable way forward. This cumulated in a further meeting of the WLWP Steering Group on 11 May 2012, where it was agreed that an amendment to the Harrow Depot site designation would overcome Harrow's outstanding concerns and avoid the need to amend the policies. The suggestion is therefore, that the boroughs agree to a revision to the site boundary of the Council Depot site at Forward Drive to reduce the area to be safeguarded for waste management.

Proposed Amendment to the Depot Site Designation

West London needs to identify a maximum of 22.4 ha of land for waste management facilities to ensure that the 2011 London Plan apportionment is

met. An additional amount of land (i.e. a contingency) is also required to ensure some flexibility in the event that identified sites do not come forward.

The proposed Pre-Submission Consultation document, previously approved by Cabinet, identified some 28.54 hectares of land for waste management. This included eight existing waste sites totalling 19.39 hectares and three new sites, including the Council Depot site, totalling 9.15 hectares. This therefore demonstrated sufficient land to meet the 2011 London Plan apportionment requirements.

Re-appraisal of the existing and new waste sites has been undertaken by the boroughs as part of work for the Sustainability Appraisal accompanying the proposed Pre-Submission Consultation document. The revised designation to the Council Depot site will result in a reduced site area being proposed for waste management from 2.83 hectares to 1.83 hectares. Overall, this will reduce the total site area identified in the WLWP from 28.54 hectares to 27.54 hectares. Whilst this demonstrates that the proposed West London Waste Plan still provides for a surplus in the land required to meet West London's appointment target, more importantly from Harrow's point of view, it will enable the Council bring forward proposals on the un-designated portion of the Depot site to improve, enhance or intensify depot functions and uses without these being considered as a departure from the West London Waste Plan.

It also means that no further site assessments are required prior to the Pre-Submission Consultation document being published for consultation.

Options considered

If Cabinet chooses not to recommend the revised West London Waste Plan: Pre-Submission Consultation document to full Council for further consultation this will delay adoption of the final Plan and impede progress on the Local Plans of the six west London boroughs. It would also affect their ability to determine planning applications for waste facilities in their areas using the latest policy framework and supporting specialist evidence on waste issues.

Next Steps

The other five West London boroughs are all in the process of securing the requisite formal approvals to ensure that the approved versions of the Pre-Submission Consultation document are identical in order to go out on public consultation. Once all six boroughs have approved the revised document, the remaining timetable for the preparation of the Plan will involve:

- a) An eight-week public consultation on the Pre-Submission Consultation document to be held across the six boroughs during July and August 2012. This has been extended beyond the six-week period originally approved to allow for this being the summer holiday period.
- b) The consultation responses will then be assessed and any further evidence base research undertaken before officers report back to the Cabinet and full Council on the Proposed Submission stage consultation

and seek Members' approval to submit the draft WLWP with any further proposed changes to the Secretary of State for formal examination.

Officers anticipate that an Examination in Public will be held during the spring of 2013 and that the WLWP will be adopted by the six boroughs as part of their respective Local Plans during autumn 2013.

Implications of the Recommendation

Legal comments

The Council has power under the Planning and Compulsory Purchase Act 2004 to prepare a joint local development document with other boroughs.

When adopted, the WLWP will constitute part of the Local Plan for each of the participating borough and will be taken into account when deciding planning applications for waste facilities in each of the respective boroughs.

As part of the legal requirements for the preparation and consultation on the WLWP, each of the participating authorities is required to consult with specific and general consultation bodies set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. A failure to comply with the statutory requirements may result in the WLWP being found 'unsound' at the examination in public.

Financial Implications

The cost of preparing and consulting on the WLWP reflects the commitment made by the six West London boroughs to deliver this Plan and the appointment of consultants to assist in this process and take it through an examination in public.

Costs associated with publication and consultation on the WLWP Pre-Submission document will be met from existing budgets. However, delays to progressing the Plan might result in the Council (and its West London Waste Authority partners) being subject to a number of additional expenses. These include costs in terms of consultant and project management fees but more significantly, costs associated with landfill taxes (stemming from the EU Landfill Directive) imposed where authorities exceed year on year reducing allowances by continuing to dispose of substantial quantities of waste to landfill. The cost of subsequent work required to progress the document to adoption is incorporated in the LDF team budget for 2012/13.

Performance Issues

The WLWP will deal with municipal waste and commercial and industrial waste in accordance with the London Plan.

It will help WLWA and the six councils reduce the amount of waste sent to landfill and improve the amount of waste reused, recycled and composted by ensuring provision is made for a range of new waste management facilities that are required to treat waste generated within west London higher up the waste hierarchy (reduce-reuse-recycle-recovery and as a final option, landfill)

Since 2004/05 the amount of household waste generated in Harrow has decreased year upon year from 105,331 tonnes to 88,326 tonnes in 2010/11. Harrow has increased the amount it recycles and composts significantly in recent years, achieving 50% in 2010/11 (the highest rate in London). The remaining 50% continues to go to landfill.

As set out in the Annual Monitoring Report, there have been no new waste management facilities provided in the borough since monitoring commenced in 2004. Unfortunately, this seems to be a common theme across most west London boroughs. Without the WLWP, and allocating sites for waste management provision, it is difficult to see how Harrow and the other five boroughs will be able to substantially improve their performance against any the above targets.

Environmental Impact

Does the proposal comply with all relevant environmental legislation? Yes

The draft WLWP has been the subject of a comprehensive Sustainability Appraisal, incorporating the requirements of Strategic Environmental Assessment, in compliance with the regulatory requirements for preparing development plan documents. The Sustainability Appraisal will be published for public consultation alongside the WLWP Pre-Submission Consultation document.

Risk Management Implications

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	To meet the test of 'soundness' of DPDs are required to comply with the legal requirements for preparing and consulting on DPDs under the Planning and Compulsory Purchase Act.	Officers will seek to ensure compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for consultation. A log is to be maintained that chronicles legal compliance as the DPD progresses towards examination and adoption.
Changes to the plan-making system	The Localism Act 2011 amends both the Planning Act 2008 and the Planning and Compulsory Purchase Act 2004. A new National Planning Policy Framework is also currently the subject of consultation. The process for preparing, and content of, Development Plan Documents will need to be	Officers will continue to keep abreast of proposals and consultation on changes to the planning legislation and national planning policy. Where potential issues arise, these will be reported to the Member Steering Group for the WLWP and to Harrow's LDF Panel to consider and advise on a way forward.

	consistent with these changes.	
Robust evidence	In preparing the WLWP, the boroughs have sought to apply a robust methodology to the assessment of existing and potential waste sites. However, there is a degree of professional judgment required, both in the assessment and in the interpretation of the outcomes that may give rise to potential 'soundness' concerns. In addition, the assessments represent a snapshot in time, and therefore the conclusions drawn now may not stand for the full life of the Plan.	The DPD includes a contingency that would allow for one or even two allocated sites not to come forward. It also includes monitoring requirements that would necessarily trigger an analysis and potential review of the Plan should the monitoring indicate an undersupply of sites or capacity.
Politically sensitivity	Waste management is typically a sensitive topic, given its has a high profile with residents as being a key function of Council's, and one that can result in adverse environmental and amenity issues. Waste management facilities are perceived by most to be a 'bad neighbour' and therefore proposals, or even the allocation of sites for waste management, can draw significant resistance.	Officers will need to work with Members to educate residents and other key stakeholders about the need for the Council to take a pro-active and positive approach to the management of Harrow's waste arisings. In particular, the implications of the EU Landfill Directive which requires waste to be diverted from landfill. Failure to do so will result in significant financial penalties for the Council. There is also a social and environmental requirement that waste be managed in the area in which it is generated (ie self-sufficiency), which is driving the change in London that we treat London's waste in London rather than transfer it out of London for disposal.

The WLWP is being prepared jointly. A memorandum of understanding has therefore been signed by six West London boroughs, which details the working arrangements. However, careful planning will be necessary to ensure that individual borough issues and concerns, political sensitivities, community involvement and decisions making processes are consistent to ensure the Plan is developed in accordance with the revised LDS timeframe.

Equalities implications

Was an Equality Impact Assessment carried out? Yes

Equalities Impact Assessment (EqIA) for DPDs is an iterative process. An equalities impact assessment has been undertaken of the Proposed Pre-Submission Consultation document. This builds on the previous EqIA

prepared for the WLWP Proposed Sites and Policies Consultation document, and will be published along side publication of the Plan.

Corporate Priorities

The completion of key LDF documents, including the WLWP, is a corporate priority for Place Shaping that will enable the Council to better manage waste in the Borough and avoid costs associated with the current practice of exporting the majority of our waste for disposal to landfill. It will assist in the delivery of other corporate priorities relevant to keeping neighbourhoods clean, green and safe.

Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the* Chief Financial Officer
Date: 28 May 2012		
Name: Abiodun Kolawole	<input checked="" type="checkbox"/>	on behalf of the* Monitoring Officer
Date: 24 May 2012		

Section 4 - Contact Details and Background Papers

Contact: Matthew Paterson, Senior Professional Policy Planning, Development and Enterprise, phone 02087366082

Background Papers: WLWP Issues and Options Consultation Document (January 2009); Sustainability Appraisal of the WLWP Proposed Sites and Policies Consultation Document (February 2011); Equalities Impact Assessment; LDF Panel Report of 8 December 2011; Cabinet Report of 15 December 2011; West London Waste Plan Proposed Sites and Policies Consultation document, February 2011 West London Waste Plan Proposed Sites and Policies Consultation: Consultation Responses - CAG Consultants, July 2011 Site Deliverability Assessment (September 2011)

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**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE**

Date: 12th June 2012

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 2011/12 work programme.

Recommendations:

Councillors are recommended to:

- I. Consider the content of the update
- II. Approve and comment on action being taken – in particular, note the cancellation of the Modernising Terms and Conditions challenge panel

Section 2 – Report

Introduction

This report updates members of the Overview and Scrutiny committee on the delivery of the scrutiny work programme.

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, the committee did not publish an annual work programme but rather has built flexibility into its programme in order to be a more responsive service.

This report provides members of the Overview and Scrutiny committee with an update on the projects which are currently underway.

Current Projects

Standing Review of the Better Deal for Residents

The first phase of this project, which focussed on the project management process used across the council, has completed and its recommendations were broadly accepted by Cabinet and have been implemented.

The second phase of the project is considering the impact of the programme on local people and whether or not the programme is achieving its ambitions. To support its work it has been agreed that regular information regarding new projects will be provided to the review group from the VERTO system. Since the last update report to this committee the review has considered the outcome of the Libraries RFID project and implementation of the Public Realm – Improving Street Based Services Project. The focus of the review has now shifted to projects included in T2. The first of these projects is the Localisation of Council Tax which will be discussed at a joint meeting with the Standing Review of the Budget in June.

Future meetings of the review are likely to consider:

- Strategic Review of Residential and Nursing Care
- Special Needs Transport

Regular reports are being submitted to both the Overview and Scrutiny committee and, where necessary, to Cabinet.

Standing Review of the Budget

This review is considering the policy environment in which budgetary and financial decisions are being made. Since the last update report the review has considered how the council manages major contract renewal and has begun the fieldwork visits to other councils (Hackney, Newham and Wandsworth) to support the investigation of the use of capital.

The reviews work programme also includes:

- Localisation of council tax benefit – with Standing Review of the Better Deal for Residents
- Further consideration of self financing of the Housing Revenue Account
- Business Rate Retention Scheme
- Fees and Charges
- Localism

Regular reports are being submitted to both the Overview and Scrutiny committee and, where necessary, to Cabinet.

Engaging Young People Review

The final report from this project was considered at the Overview and Scrutiny meeting in May and the report will be received by Cabinet on 21st June.

Private Sector Housing

The Overview and Scrutiny committee included this project in its work programme in order to assess the capacity and quality of private rented housing in the borough. Detailed evidence gathering is underway and a report to the Overview and Scrutiny committee is expected in the summer.

Customer care

The Overview and Scrutiny committee has agreed to include this project in its work programme in order to assess the quality of the customer journey through the council. The final scope for this project was agreed in May and the fieldwork will commence in June/July following a slight delay due to pressure within the work programme.

Safeguarding Children

This investigation assessed progress by the Council and health partners in delivering the recommendations from NHS London Safeguarding Children Improvement Team visit in October 2010. The report from the review is included elsewhere on the agenda for this evening's meeting.

NW London Commissioning Plan – ‘Shaping a Healthier Future’

NHS NW London is proposing significant changes to the delivery of health services in its commissioning strategy and, as required, is now consulting with all of the NW London boroughs (Harrow, Brent, Ealing, Hillingdon, Westminster, Hounslow, Kensington and Chelsea and Hammersmith and Fulham) which will be impacted by these changes. A shadow Joint Overview and Scrutiny Committee (JOSC) has been established and this has been meeting informally since March and thereafter the formal JOSC will begin to meet in June. Formal consultation is proposed between June and September.

A final report from the JOSC will be presented to the Overview and Scrutiny committee in the autumn.

Modernising Terms and Conditions

The Overview and Scrutiny committee was approached in the spring with a request to consider the council's proposals to modernise staff terms and conditions. As the council is following statutory process which determines the

consultation etc, it was felt that a scrutiny investigation was no longer necessary. As a result, the proposed challenge panel has been cancelled. However, the Corporate Resources Lead Councillors will monitor the implementation of proposals.

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.

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 if proposals are endorsed.

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
- Supporting our Town Centre, our local shopping centres and businesses

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