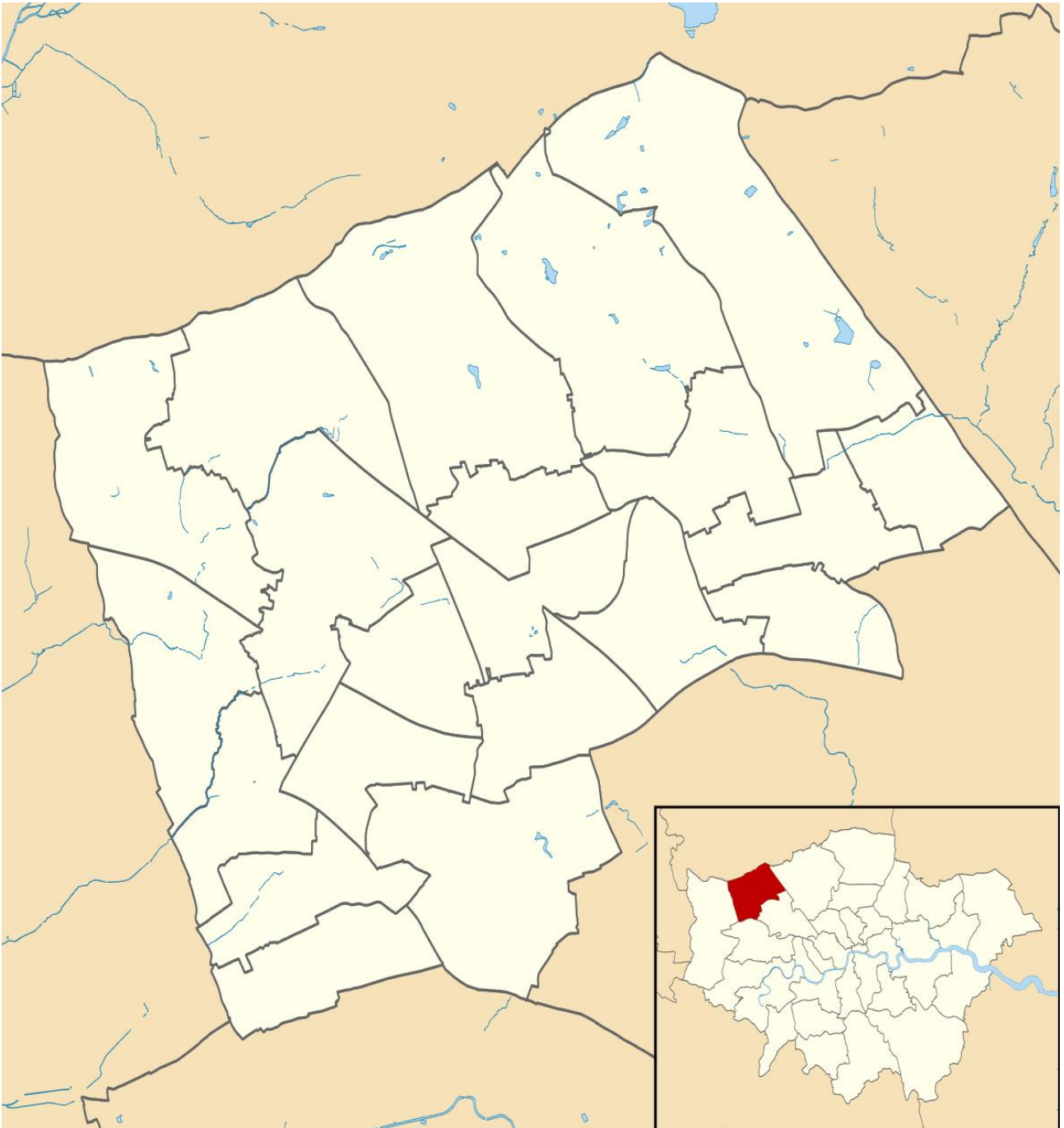

Overview and Scrutiny

FINANCING OF THE REGENERATION PROGRAMME IN HARROW

A report by the Regeneration Scrutiny Review Panel

October 2017



Chairman's Foreword

[Foreword to be included by Chairman]

Councillor Barry Macleod-Cullinane
Regeneration Scrutiny Review Challenge Panel Chairman

Scope of Review

This Scrutiny Review relates to the Council's regeneration and development programme on general fund land, HRA land, other public sector land and private land in the borough over the period 2017-21.

The purpose of the review was to:

- Review the planned capital and revenue financing for the regeneration programme and to assess whether the Council's proposals for the financing of its regeneration programme are realistic, affordable, robust and deliverable. This includes aspects of the commercialisation strategy (e.g. the proposal to build private homes for rent) that directly impact upon the Regeneration and Development Programme;
- Review selected financial assessments for individual regeneration projects; including investigating the regeneration programme finance model, in particular the underlying assumptions, cash flow projections and projected costs and benefits over the near and longer term;
- Ensure that financial risks are properly considered and that proposed mitigations are appropriate and balanced;
- Appraise the projected financial benefits of the Council's regeneration programme, and ensure a balanced risk management process and proposed mitigation measures are in place;
- Greater understanding and clarity of the financing of the Regeneration and Development Programme by members;
- Carry out a review of projected benefits of the regeneration programme, including direct and indirect benefits to the Council, business and to the local community.

The measure of success for this scrutiny review was to ensure a greater understanding and clarity of the financing of the Regeneration and Development Programme by members.

Methodology

This Scrutiny Review has involved desk research, two Challenge Panels and two Field Visits as detailed below:

1. Policy Officers undertook desk research into the financing of regeneration programmes in a select number of Councils that have a similar make-up to that of Harrow. The aim was to investigate what other comparable local authorities were doing as part of a regeneration and commercialisation agenda. The Panel also had the opportunity to scrutinise the latest update on Regeneration, which was published on 14 September 2017.
2. Members and officers visited two London Boroughs (Barnet and Waltham Forest) to gain a detailed understanding into the challenges that were being faced. These Field Visits explored best practice by other councils in how they finance and manage their regeneration and development programmes. The political leadership

of the councils that were chosen for visits were equally divided between Conservative and Labour control, reflecting the main political parties in the council.

3. Two Challenge Panels were held, with questions being put to the Chief Executive, the Director of Finance, the Divisional Director of Regeneration and the Leader and Deputy Leader of the Council.

Harrow Context

Harrow prides itself in being one of the most ethnically and religiously diverse boroughs in the country with people of many different backgrounds and life experiences living side by side. It is the richness of this diversity, and the positive impact that it has on the borough and the community. 69.1% of residents classify themselves as belonging to a minority ethnic group and the White British group forms the remaining 30.9% of the population, (down from 50% in 2001). The 'Asian/Asian British: Indian' group form 26.4% of the population. 11.3% are 'Other Asian', reflecting Harrow's sizeable Sri Lankan community, whilst 8.2% of residents are 'White Other', up from 4.5% in 2001. In terms of religious belief, Harrow had the third highest level of religious diversity of the 348 local authorities in England or Wales. The borough had the highest proportion of Hindus, Jains and members of the Unification Church, the second highest figures for Zoroastrianism and was 6th for Judaism. 37% of the population are Christian, the 5th lowest figure in the country. Muslims accounted for 12.5% of the population.

Harrow has a population of 247,130 people¹ which has grown over the last decade by 11.8%. This is above the UK average annual population increase rate over the same time period. 49.8% of the population are male, whereas 50.2% of Harrow's residents are female. Harrow is an affluent borough with pockets of deprivation mainly around the centre, the south and east of the borough; including the wards, Roxbourne, Greenhill, Marlborough, Harrow Weald, and Wealdstone, which also has the highest level of income deprivation in the borough. Harrow's least deprived areas are largely found in the north and west of the borough.

Employment levels in Harrow are generally good, and Harrow has seen a reduction in unemployment and the number of long term unemployed claimants. However, a number of residents are low paid and have low functional skills. The employment deprivation domain within the 2015 Index of Multiple Deprivation (IMD) indicates 12,083 of Harrow's residents experiencing employment deprivation. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.

Overall, Wealdstone is Harrow's most deprived ward for employment deprivation, closely followed by Roxbourne. Unemployment figures are highest in Greenhill, Wealdstone and Roxbourne wards. Employment deprivation is generally concentrated in areas with higher levels of social housing, such as the Rayners Lane Estate in Roxbourne; the Headstone Estate in Hatch End and Harrow Weald; the Woodlands and Cottesmore Estates in Stanmore Park; and the former Mill Farm Close Estate in Pinner.²

¹ According to 2015 Mid-Year Population Estimates

² Harrow Council (2017) *Equality Matters: Reducing Inequality in Harrow*

In terms of child poverty³, Within Harrow, the highest proportions of the population without qualifications or with low level qualifications are in Kenton East, Edgware, Roxbourne and Roxeth. Poor language skills are a major barrier to progressing in the workplace. Harrow was one of 25 local authority areas identified by the Department for Communities and Local Government as an area with high levels of need for English Language provision. 28.5 % of Harrow's residents have a foreign first language. In 15.9 % of households English is not the main language of any household occupants, the 10th highest ranking nationally and much higher than the national level of 4.3 %. The 2011 census showed 1% of Harrow residents unable to speak English at all, compared to 0.6% for London and a national figure of 0.3%.

(FSM) and non FSM in terms of the number achieving at least 5 A*-C GCSE grades. Families in Harrow experience poverty for a variety of reasons, but its fundamental cause is not having enough money to cope with the circumstances in which they are living. A family might move into poverty because of a rise in living costs, a drop in earnings through job loss or benefit changes. Children in large families are at a far greater risk of living in poverty – 34% of children in poverty live in families with three or more children.

Schools in Harrow are; on the whole, among the best performing in the country which has been maintained over a number of years, with 95% being judged as Good or Outstanding (31st August 2016). However, inequalities in education exist in Harrow, particularly amongst children with special educational needs (SEN), those eligible for FSM, and specific ethnic groups. There is a wider gap between pupils who have special educational needs and their peers at Key Stage compared to the national average. Additionally, children who receive FSM show less progress across all subjects between Key Stage 1 and Key Stage 2 compared to their peers.

In terms of public voice and victim satisfaction, *Harrow is currently recording 79% victim satisfaction (ranked 20th in London) and 64% 'good job' confidence levels for residents of the borough (27th of the 32 London boroughs); this is according to data published by the Mayor's Office for Policing and Crime.*

Harrow is fortunate that it is served by London Underground Lines, London Overground, London Midland, Chiltern Railways and Southern Railway, which connect it to London and the rest of England.

Council Priorities

In light of the local context Harrow have based the Council's Ambition Plan on the following priorities:

- **Building a Better Harrow**

The Council's regeneration programme for the delivery of new homes, creation of new jobs, commercial workspaces and high quality town centres will create the places and opportunities that residents deserve and make a difference to the borough and to residents' health and quality of life.

³ Poverty in this document refers to the *relative* poverty measure (defined by Peter Townsend as "Resources that are so seriously below those commanded by the average individual or family that they are, in effect, excluded from ordinary living patterns, customs and activities."). The definition of poverty used in this document is: *Families which have £79 less per week than families on average income.*

- **Protecting the Most Vulnerable and Supporting Families**
The Council's aim is to make sure that those least able to look after themselves are properly cared for, safeguarded from abuse and neglect and given access to opportunities to improve their quality of life, health and wellbeing.
- **Being more Business-like and Business Friendly**
The Council aims to support local businesses and enable them to benefit from local economic growth, develop its own commercial ventures and help residents gain new skills to improve employment opportunities.

Harrow's Regeneration Programme

Through regeneration the Council aims to make a difference for:

- Communities, by providing new homes and jobs, vibrant town centres and an enhanced transport infrastructure and energy network;
- Business, by providing new commercial workspace, support to access markets, advice and finance;
- Vulnerable residents, by providing access to opportunities, reducing fuel poverty and designing out crime; and
- Families, by providing new family homes, expanded schools and renewing Harrow's estates.

The aims of Harrow's Regeneration Strategy are to:

- Meet the demands of a growing population
- Build on the skills base of Harrow's residents to support sustainable business growth
- Deliver more jobs and homes to meet targets agreed with the Mayor
- Increase Harrow's accessibility to an increasing customer base
- Provide an environment which promotes physical activity and healthy living
- Achieve a step change in the quality of design and development.

The regeneration strategy is therefore a key priority for the council, and has a number of objectives, including:

- 'Building a Better Harrow' together, for today and for future generations.
- Addressing housing need, particularly for affordable housing.
- The Council developing its own land – to meet community needs and to make better use of its own assets.
- A new initiative for the Council to build homes for private rent (in addition to social rent/affordable housing). There is a Build-to-Rent programme to develop about 600 new private rented sector (PRS) homes on Council land, for market rent.
- Renewing civic, cultural and community facilities and meeting infrastructure needs through the provision of: 2 new schools, a new Central Library and a new (more efficient and smaller) Civic Centre, together with improved cultural and leisure provision.
- Creating quality places – both through a focus on quality design in new development and through schemes to create new public squares and spaces and to improve key links and routes (such as Station Road).

- Getting maximum benefit for the local economy – through the creation of new employment space and measures to develop local apprenticeships and training schemes and to build local supply chains.

The programme comprises 9 sites, together with the district heating programme currently in feasibility. It is currently envisaged that the initial phases of works will comprise around 600 units of private rented housing, together with a New Civic Centre for Harrow. It is envisaged that the later phases will be delivered in concert with development partners and will produce affordable housing, workspace and commercial facilities, plus housing for market sale. Subject to agreement on funding and affordability, a new or remodelled leisure centre may also be delivered at Byron Quarter.

Faithful & Gould are now working on the programme as cost consultants and are providing commercial advice together with benchmarking using the wide range of comparable data available to them. This is informing design development to ensure that schemes meet the Council's objectives while remaining financially viable, before designs are submitted to planning.

Poets' Corner – The flagship project in Harrow's regeneration programme, the site is currently the civic centre and offices for Harrow Council. The project involves the delivery of about 900 homes (including approximately 400 build-to-rent units to be retained by the Council), a new school, commercial and community space and high quality public realm. Contracts have been exchanged for the purchase of the Wealdstone Social Club. Also, the negotiations with the GLA on the Housing Zone funding for Poets' Corner are at an advanced stage. The design team has started work on RIBA stage 3 (detailed design). The target planning submission date is October 2017, for a hybrid application to approve the masterplan and detailed proposals for phase 1. As part of design development the number of residential units in Poets Corner Phase 1 has increased from 350 to approximately 410 (the exact number is subject to review as the design is further refined). This can be achieved within the existing budget.

New Civic 'the Wealdstone Project' – A new Civic Centre is being planned for Wealdstone. The new, smaller home will be more efficient to run as well as delivering necessary services, housing and affordable workspace and improved public realm. The project has reached RIBA stage 2 (concept design) and the target planning submission date is November 2017. 3.5. Byron Quarter – the project will provide a mix of housing types and tenures, including Council-owned build-to-rent and affordable. The RIBA Stage 2 (Concept Design) report has been completed and approved by Project Operations Board. A business case is under review for Phase 2, which would potentially include a new Leisure Centre and other facilities for indoor/outdoor recreation and sport. This will be subject to Cabinet decision later in the year. A planning application is scheduled for November 2017. In parallel with the increase in build-to-rent units at Poets' Corner the rental component in Byron Quarter Phase 1 has been reduced from 200 to 135. The remainder of Phase 1 will be delivered as homes for sale and private development.

Greenhill Way – A feasibility study has being produced showing options around high quality commercial and residential development including homes, offices, retail, hotel and leisure uses. Soft-market testing has demonstrated the opportunity to take this scheme to market.

Haslam House – pilot project. Nine units of Council-owned build to rent accommodation. Following a public engagement programme, and revisions to the initial scheme, planning approval was secured in September 2016. It has been decided to appoint a new contractor following the pre-construction agreement work, in order to ensure that the Council achieves the best possible price for the delivery of this scheme. It is now proposed that the project is re-tendered on an open, single stage basis, using the existing design information. The tender will be advertised via the London Tenders Portal and Contracts Finder in accordance with Harrow's Contract Procedure Rules. Once the procurement process is complete it is recommended that the decision to enter into contract is delegated to the Chief Executive following consultation with the Portfolio Holder for Business, Planning and Regeneration, the Portfolio Holder for Community, Culture and Resident Engagement and the Portfolio Holder for Finance and Major Contracts.

Vaughan Road – this scheme is for 33 units of Council-owned build to rent accommodation and has been submitted for planning approval. An extensive pre-application public engagement programme has recently been completed.

Waxwell Lane – Residential development on the Waxwell Lane car park site. Following an extensive consultation programme, an options paper and RIBA Stage 2 (Concept Design) Report have been completed. Following council approval of one of the options in the options paper, the project is ready to progress into detailed design. Refer to section 6 below for further details.

Roxeth Library – aims to provide an improved library facility along with residential development. A final response is awaited from the Ministry of Defence on the height limit for the nearby high priority Grange Farm site. The next step is to progress a feasibility review and an options paper to scope whether or not a development is viable within the current height limit for this site.

Harrow Arts Centre – the Regeneration Unit has been instructed by the Council to engage users and community and stakeholders to progress a fresh development brief retaining cultural uses and recommend next steps whilst the centre continues to operate. The future delivery of arts and heritage services is subject to a separate report on the agenda, with the report recommending that Cabinet authorise the Divisional Director of Environment and Culture, following consultation with the Portfolio Holder for Community, Culture and Resident Engagement, the Deputy Leader and Portfolio Holder for Business, Planning and Regeneration, and the Divisional Director of Regeneration, Enterprise and Planning, to develop an options appraisal for the Harrow Arts Centre site to be brought back to Cabinet.

Gayton Road – This is a scheme of 358 units which is being delivered by Fairview Homes and will deliver 72 affordable homes and 53 build-to-rent homes to the Council through a development agreement. Phased handover starts in spring 2018 and continues for approximately 1 year. The project is currently on site and ahead of schedule.

District Heating Network – Following completion of the Energy Master Plan, a detailed feasibility study is now underway to establish the best method to deliver heat to the major regeneration sites. This includes an evaluation of the best location for energy centre(s) to deliver combined heat and power. Financial viability for an integrated network to serve a number of sites is being established. Match funding is available from central government for this project but no final decision will be taken on whether or not to proceed until a

business case is complete. Related projects all have alternative energy strategies should the integrated network not proceed.

Case Studies

As part of the Regeneration Scrutiny Review we undertook research into other local authorities who were undertaking regeneration programmes. This provided members insight and evidence on the scale and financing of regeneration programmes across a number of London boroughs. The paper included councils that are closest in comparison to one another based on a set of indicators of the demographic and socio-economic nature of the borough, including: total population, taxbase per head of population, % unemployed, retail premises per 1,000 population, and housing benefits caseload.

Closest comparator Councils with regeneration programmes include:

- Hillingdon
- Ealing
- Croydon
- Enfield
- Hounslow

In addition, the Chairman and Vice-Chair requested that information on the regeneration programmes in the following boroughs also be considered by the Regeneration Scrutiny Review Panel:

- Wandsworth
- Haringey
- Waltham Forest
- Barnet

Information on the councils listed above was prepared using a combination of information extracted from Council web sites, regeneration strategies, project reports, developer web sites, local press stories, and Regeneration Council officers. A complete copy of this desk research can be found in the Annex to this paper.

Overview of Challenge Panels

Two Challenge Panels were held, on 27 September and 5 October. Members heard from and asked questions of the Chief Executive, the Director of Finance, the Divisional Director of Regeneration, the Leader and Deputy Leader of the Council. The detailed notes of both meetings (including all questions asked, and answers provided) are appended to this report.

The main discussion points were as follows:

Programme Rationale

Members heard from the Deputy Leader that there were five guiding principles to the Programme:

1. Providing housing
2. Providing jobs

3. Providing good education
4. Linking up with the NHS to provide excellent local services
5. Providing excellent local leisure facilities

Extensive consultation had been undertaken with the local population and stakeholders to frame the Programme. The Leader of the Council stated that he wanted the programme to tackle crime and ensure that the benefits of Programme are felt by all residents and businesses.

Borrowing/ Spend to date

Members were advised that the Council had not borrowed anything to date and that officers hoped that there would not be a requirement to borrow over the next financial year. An update on this would be provided to the Cabinet in December.

The spend to date was £15m (in this financial year) including land assembly, site purchase, engineering contracts and capitalised time of the Regeneration Team; this represented an underspend of the projected budget. The Director of Finance undertook to provide members with a forecast of all spend for the year end outwith the meeting; officers were currently working on revised Quarter 2 returns and would be in a position to provide accurate figures for this financial year.

Risk Management

Members queried as to whether wages could be capitalised for all projects and whether the capitalisation of wages had been included on the risk register. Officers confirmed this was not the case.

In relation to capitalisation and costs, officers confirmed that this did not include payments to consultants.

Recommendation 1

For the Corporate Risk Register to include the capitalisation of wages in the Regeneration Programme, and the revenue risk involved if this cannot happen in certain cases

Officers explained that there were three levels to the risk management process; (1) project level discussions were held monthly, (2) programme level risks were recorded and (3) utilisation of the corporate risk register. The Chief Executive further expanded that in addition there were macro level risks, Brexit, changes in legislation, changes in interest and borrowing rates, rental values, housing market changes all to take into account.

Interest Rates

PWLB rates were 2% short term and 2.7% for longer term loans; officers provided an assurance that they were keeping the model up to date in relation to interest rates changes, and explained that the Council would take on a loan at a fixed rate to mitigate against future changes to interest rates. The Chief Executive added that it was likely that interest rates would rise in the near future, so at the December Cabinet meeting, Members would be asked to consider borrowing options including locking it in for two years, Bonds and the European Investment

Bank. The Deputy Leader stated that if interest rates rose to 5% then a return of 10% would be required (the current model is based on a 5% return rate).

Officers reinforced that this was a phased project, so there was scope for rephasing, scrapping a phase or delivering a phase in a different way if the financial climate changed significantly.

Modelling and Commercial Strategy

Members noted that at the point the Council borrowed there would be a revenue effect and that there were a number of these effects had not been modelled or taken into account, including additional pressure on the NHS, refuse collection, education services, a potential increase in crime and council tax benefits.

The Chief Executive suggested there was also a need to look at the social and economic effects, increase in employments, business rates and apprenticeships – all of which would have a positive impact on the local economy. He continued that the Council now had an infrastructure delivery plan, and that there was CIL money to invest in infrastructure (it was projected that the Council will receive around £20-£22m), but that more work was required on this. The Chief Executive added that this modelling should be reflected in the December report to Cabinet.

A discussion took place around the need for health centres to be built as part of the Programme, perhaps in partnership with the private sector; it was suggested that this should be integral to the Programme in order to truly build a better Harrow.

Members raised the issue of the regeneration of Harrow Town Centre; Debenhams was detached since the opening of St Annes and St Georges Centres. The local businesses were successful, but for the larger companies the demographic and economic profile was wrong. It was difficult to see how the Council could attract larger brands/ companies to Harrow. If the Council wanted to attract more businesses to the Town Centre, it was imperative that it was businesses suited to the profile of the population. The Deputy Leader agreed with this point and added that he would like to see an increase in retail and leisure facilities, and make Harrow a destination for food. He advised that talks had taken place with retail analysts who would recommend what should be provided.

The Deputy Leader further advised that he had been in discussions around shops in St Annes extending their opening hours, but the tenants are of the view that it would cost more to stay open than they would recoup in sales.

Members raised a general concern that there seemed to be a lack of joined up thinking in relation to the Programme and that the issues that had not been taken into account to date may have a significant impact on the success of the project, so it was imperative that officers undertake the all encompassing modelling as a matter of urgency.

Recommendation 2

Officers to produce one report that includes all risks and mitigations in relation to the Regeneration Programme, including the effect the increase in population will have on NHS, education, transport services (including

both infrastructure improvements to rail and bus services and better London orbital routes and an increase in London Midland services and local transport issues that will be experienced throughout the developments – parking and road issues) and refuse collection and increased demand for enforcement and regulation against the potential social and economic gains including increase in Council Tax receipts and business rates (including any business profiling that has been undertaken and a strategy to encourage businesses to move and stay in Harrow), New Homes Bonus, increased employment (and whether this will be long or short term), apprenticeships

Infrastructure

Members probed as to the actions being taken to alleviate parking pressures. The Leader of the Council stated that this was a consideration of the Planning Committee for each application it received. The Chief Executive added that a report had been produced by Atkins, specifically on the Wealdstone area. Members again reiterated the need for a cumulative report that considered all of this, transport, health, education, needs to be one governance oversight of all of this in one place.

It was suggested that there was a lack of employment / office facilities in Harrow, and that this was not a new problem. It was noted that there was no large industrial estate. Members asked what was being done to get large businesses into the local area. The Head of Regeneration undertook to provide a written response to this. In the same line of questioning at the second Challenge Panel, the Deputy Leader suggested that there was a need to engage with a developer who was familiar with the local area in order to develop a viable project.

Members raised the issue of the frequency of London Midland trains, and it was unanimously agreed that this service should be more frequent. The Deputy Leader added that there had been discussions with TfL around this and also in relation to a proposed express Heathrow Airport service with Luton Airport, even potentially operating as a council run service, but no progress had been made on this to date. Members queried as to whether a lobbying strategy was in place. The Leader agreed that there was a need for a more frequent London Midland service and stated that he was in discussions around how to push to extend HS1 line. He continued that the train platforms were often nearly at capacity, and that he would continue to lobby around this, and could and would push harder. In relation to local job opportunities, the Leader suggested that more cross party work could be undertaken.

Recommendation 3

For a letter to be drafted from the Leader of the Council and the Leader of the Opposition to the Mayor and TfL (London Underground Lines and London Overground), Government Ministers/Department of Transport, Network Rail, and rail operating companies (London Midland, Southern, and Chiltern Railways) calling for improvements in capacity and facilities at Harrow and Wealdstone Station and Harrow-on-the-Hill station along with greater frequency, more capacity and improved reliability of all London Underground Lines, London Overground, London Midland, Chiltern Railways and Southern

Recommendation 4

For a lobbying strategy to promote improved transport links to central London and out of London to be developed and integrated within the Regeneration Programme

Population Projections

Officers advised that 5500 homes would be built over ten years, which would see an increase of between 11 and 15000 people; but some of that demand was already in the borough. The Chief Executive agreed that there was a requirement to consider the impacts of the population increase.

The Deputy Leader suggested that an objective of 3500 new jobs was achievable. Members reiterated that long term jobs had to be created, in addition to short term jobs associated with the building phase of the Programme.

Recommendation 5

Chief Executive to produce a Harrow specific, all-encompassing infrastructure plan/ strategy, which will incorporate the Atkins study on Wealdstone and clearly set out how the impacts of the Regeneration Programme will be managed both short and long term

Recommendation 6

For all strategies produced by the Council to reference the Regeneration Programme and how they contribute to or are impacted by it

The final recommendations to Cabinet from the Panel are:

1. That the Corporate Risk Register include the capitalisation of wages in the Regeneration Programme, and the revenue risk involved if this cannot happen in certain cases;
2. That it instruct officers to produce one report that includes all risks and mitigations in relation to the Regeneration Programme, including the effect the increase in population will have on NHS, education, transport services (including both infrastructure improvements to rail and bus services and better London orbital routes and an increase in London Midland services and local transport issues that will be experienced throughout the developments – parking and road issues) and refuse collection and increased demand for enforcement and regulation against the potential social and economic gains including increase in Council Tax receipts and business rates (including any business profiling that has been undertaken and a strategy to encourage businesses to move and stay in Harrow), New Homes Bonus, increased employment (and whether this will be long or short term), apprenticeships;
3. That a letter to be drafted from the Leader of the Council and the Leader of the Opposition to the Mayor and TfL (London Underground Lines and London Overground), Government Ministers/Department of Transport, Network Rail, and rail operating companies (London Midland, Southern, and Chiltern Railways) calling

for improvements in capacity and facilities at Harrow and Wealdstone Station and Harrow-on-the-Hill station along with greater frequency, more capacity and improved reliability of all London Underground Lines, London Overground, London Midland, Chiltern Railways and Southern;

4. That a lobbying strategy to promote improved transport links to central London and out of London to be developed and integrated within the Regeneration Programme;
5. That it request that the Chief Executive to produce a Harrow specific, all-encompassing infrastructure plan/ strategy, which will incorporate the Atkins study on Wealdstone and clearly set out how the impacts of the Regeneration Programme will be managed both short and long termthe Chief Executive produces a Harrow specific, all encompassing infrastructure plan/ strategy, which will incorporate the Atkins study on Wealdstone and clearly set out how the impacts of the Regeneration Programme will be managed both short and long term
6. That all strategies produced by the Council to reference the Regeneration Programme and how they contribute to or are impacted by it.