

Meeting:	Cabinet
Date:	18 September 2008
Subject:	Local Development Scheme - Revision
Key Decision:	Yes
Responsible Officer:	Andrew Trehern Corporate Director Community and Environment
Portfolio Holder:	Cllr Marilyn Ashton Portfolio Holder for Planning, Development and Enterprise
Exempt:	No
Enclosures:	Appendix 1 – Revised Local Development Scheme – Summary of Key Dates Appendix 2 – Summary of Key Changes to National Planning Policy Legislation and Guidance Appendix 3 – Planning Policy Updates Appendix 4 – Overview of Progress by Other Boroughs Appendix 5 – Recommendation from the Local Development Framework Advisory Panel

## Section 1 – Summary and Recommendations

This report identifies the need to amend the existing local development scheme (LDS) to reflect the new timing for producing key development plan documents (DPDs) and supplementary planning documents (SPDs). Additionally, the report identifies the impact recent changes to planning legislation made by the Government has on the Council's local development framework

process and the necessary work required to ensure the core strategy evidence base is robust. A Harrow Town Centre Supplementary Planning Document is proposed as one measure to help mitigate the impact of national policy changes on the delivery of the Local Development Framework (LDF) core strategy.

**Recommendations:**

- 1) that the local development scheme (LDS) be revised
  - (a) to reflect the new timeline
  - (b) to better reflect the time needed to prepare and update the evidence base for the Core Strategy
- 2) a Harrow Town Supplementary Planning Document be prepared to help manage the development pressure in the town centre
- 3) that the revised LDS be submitted to the GLA and GOL for approval

**Reason: (For recommendation)**

To ensure the Council stands the best possible chance of the LDF core strategy being found sound by the planning inspectorate at an examination in public and avoid unnecessary delays in the adoption of the core strategy by allowing more time to prepare a robust evidence base.

To ensure interim controls are developed to help manage development pressure on Harrow Town Centre, whilst the LDF core strategy is being prepared for submission to the Secretary of State.

To ensure the Council receives the maximum possible amount of funds from the Government through the Housing and Planning Delivery Grant for the plan-making, by having an up to date local development scheme.

To forward the revised LDS to both GOL and GLA for final approval to replace the existing LDS (2007), prior to the Council implementing the revised LDS.

## **Section 2 – Report**

The report details the following:

- A. Background
- B. Overview of recent changes to the planning system
- C. Update on evidence base

- D. Possible implications to developing the core strategy and rationale for a new supplementary planning document
- E. Summary of proposed amendments to the local development scheme
- F. Implications and risks of the recommendations

## **A. Background**

1. Over the last year the Council has been working hard to progress the development of the local development framework (LDF), specifically the core strategy development plan document and various supplementary planning documents. The Council has successfully consulted on the core strategy draft preferred options and is making significant progress on developing the s106 and sustainable development supplementary planning guidance.
2. The Council is developing planning documents in line with the revised timetable in the LDS. Specifically, there are changes to the lead in time for all development plan documents. Specifically, the JWDPD is being developed in partnership with the 6 West London waste management boroughs. The timetable for the development of this document (and other DPDs) requires revision as the original timetable was overly ambitious. Refer to **Appendix 1** for proposed revised LDS.
3. Additionally, recent changes by the government to the planning legislation and national guidance are having a significant impact on the scope and detailed information required before plans can be adopted, particularly the core strategy and other development plan documents.
4. This report identifies changes to the planning system and the level of work the Council is undertaking to ensure that the core strategy draft preferred options complies with legislation and meets the government's prescribed tests for "soundness" at an examination in public.

## **B. Overview of recent changes to the planning system**

5. The government have recently made several significant changes to the planning system including:
  - Changes to the Town and Country Planning (Local Development) (England) Regulations 2004
  - Production of consultation paper on new Planning Policy Statements 4 (planning for sustainable economic development) and 6 (planning for town centres)

- PPS 12 (local spatial planning) now replaces PPG 12 (Development Plans)
- Planning Policy Statement 3 (housing), which replaced Planning Policy Guidance 3 and Circular 6/98 (planning and affordable housing)

Refer to **Appendix 2** for summary of key changes for documents above. Refer to **Appendix 3** for planning policy updates and **Appendix 4** for a summary of progress by other boroughs.

6. Previously, planning guidance for the core strategy was to produce a succinct dynamic document that set out Harrow's long-term strategic vision and spatial options for where future growth would be promoted. However, through the recent changes to the planning system, the Government has given a very clear steer that it expects local plans (particularly core strategies) to demonstrate:
  - viable growth areas (GOL considers the Councils two growth options viable)
  - that growth is deliverable – particularly that strategic sites to be developed are clearly identified and information is provided on the amount of development that could be accommodated, the mix of development and the necessary infrastructure required to support growth
  - that the Council has actively engaged with delivery stakeholders including private land owners, developers, stakeholders and infrastructure providers (TfL, PCT, Police, Three Valleys, Thames Water, etc) and neighbouring boroughs to ensure sites for development are available, the necessary infrastructure is assessed and provided for in future plans and cross boundary issues are taken into account
7. The changes above are intended to ensure the delivery of a robust planning framework for the area, help speed up the delivery of local plans by giving greater clarity about what information is needed to ensure that the Council's DPDs are found "sound" by the Planning Inspectorate<sup>1</sup> when submitted for an examination in public. The Council is finding that by having to supply greater detail so that the core strategy will be

---

<sup>1</sup> The Planning Inspectorate (PINS) acts on behalf of the Secretary of State and assesses the quality of planning documents, at a 'hearing' referred to as an examination in public (EIP). An EIP is a public process and a planning inspector considers issues raised in public responses, the quality of the evidence base and conformity with legislation and other plans. At the end of the examination, the inspector makes a binding recommendation to the Secretary of State, either to approve (find a plan sound) or not.

deliverable, the changes are slowing down progress as the Council is required to prepare new and update existing evidence.

8. Irrespective of the additional work the Council is undertaking to ensure the core strategy has a better chance of being found sound by the PINS inspector, there is still a chance that the plan could be found 'unsound' and the Council directed to restart the process. However, the in house work currently underway should significantly reduce this chance (refer to section C and D of this report for details).
9. In a recent meeting between Council officers and GOL, GOL reinforced the need for the Council to ensure that its evidence base was up-to-date, complete and takes account of the government's recent guidance, prior to submitting the final core strategy to PINS.

### **C. Update on evidence base**

10. To meet the objectives for the Core Strategy introduced by the recent changes to planning regulations and national guidance, the Council recognises that it is essential to fully investigate the impacts of development on the borough.
11. Harrow is working with other West London Boroughs to develop a Joint Waste DPD (JWDPD). The changes to planning regulations and national guidance means that the JWDPD will take much longer than originally envisaged to finalise, as the work required to gather relevant evidence, and consult on any possible waste management options across all 6 West London boroughs will take longer than initially expected. In addition, all 6 West London boroughs are at different stages with the development of their planning documents. Therefore the JWDPD needs to 'fit in' with existing policies that have been developed and consulted on as well as help to inform emerging policies.
12. Accordingly, the timetable for producing the JWDPD has been revised, by the consultants in liaison with officers, and it is considered to be deliverable. The JWDPD is now unlikely to be approved until 2011, at the earliest.
13. In addition to the impacts on the JWDPD, the Council also needs to assess the impacts of the recent changes on the two growth options in the core strategy draft preferred options. This will involve further and more detailed work on: strategic sites, transport, health requirements, sports and leisure facilities etc. Much of this work depends on the Council's partners finding sufficient time to assist the Council with long-

term delivery plans. Much of this work is underway and progress is summarised below:

#### Strategic Development Sites

14. Work is underway to identify strategic development sites to review how 'deliverable' growth options are, as required by the changes to Planning Policy Statement 12 (PPS12). It is envisaged that this work will be critical to identify notional development capacity, infrastructure provision and possible constraints to prove that the Council can 'deliver' growth – within the parameters of the planning system. This will include;
  - identifying strategic sites
  - having discussions with the site owners about any possible future development plans
  - undertaking an assessment of the notional development potential and constraints for each site according to detailed methodology set out by the GLA (set out in the housing capacity study)
  - identifying what infrastructure exists and what will be needed to support future growth
15. Officers have initially identified 31 sites that need to be assessed to support the core strategy.
16. This work is particularly critical for Harrow Town Centre, as the Council has been experiencing unprecedented development pressure from private developers, wanting the Council to allow development at much higher densities than currently exists in the heart of Harrow. The Council needs to ensure that growth is managed in a way that enhances the town centre, particularly as the core strategy is unlikely to be approved until 2010 at the earliest.

#### Characterisation Study

17. The Council is finalising a study of the entire borough, which aims to identify the different characteristics of residential areas. The study has regard to the historical growth, built quality, architecture layout, and relationship to open space, local landmarks, views and topography. The outcome of this study will help to inform opportunities and constraints in relation to the Council's future core strategy. It will also help to inform policies so that they are locally distinct – a key requirement of the changes to the planning regulations and emphasised in PPS12.

18. External verification by urban design colleagues and other peers is proposed to ensure that it is credible and robust. Additionally, officers have discussed this work with the GOL and they are particularly supportive of this innovative approach.

#### Housing provision and local need

19. The GLA are currently reviewing the 2004 Housing Capacity Study to identify sites that are likely to be developed in London up to 2031 which will ultimately result in revised borough housing delivery targets. The methodology being used to assess site availability and notional development capacity is being incorporated into the Council's identification of strategic sites.

#### Education provision

20. Work has been completed on the impact increased housing development could have on the existing places and classes within Harrow's schools, both primary and secondary. This work demonstrates that the future growth in school-aged population can be met with existing resources. A major factor is that the change in the age of transfer has freed up space.
21. This work will need to be updated once the Council has decided which growth option to promote in the final core strategy.

#### Sport and leisure facilities

22. Joint work is underway between Sport England and the Council's leisure services and planning policy divisions to assess the future need for sport and leisure facilities throughout the borough. This work utilises national data collected by Sport England on what level of sport and leisure facilities exist within Harrow and all surrounding boroughs, in future leisure improvements, changes in the population and takes account of levels of sport activity.
23. Harrow is one of the first boroughs to approach Sport England to use this national model specifically to inform the evidence base for the core strategy and ultimately better inform policy development.

#### Transport

24. The Council is working with one of its partners Enterprise Mouchel, to investigate the impact of future development growth on the existing transport infrastructure network, identify capacity issues and areas for improvement. This is a critical piece of work, as both growth options in the core strategy draft

preferred options rely on future development being built close to existing transport (particularly public transport) infrastructure. The Council will need to provide evidence that the transport network can accommodate planned future growth.

### Health

25. The Council is working with the PCT to try to ensure future health facilities (new centres and upgraded facilities) are provided in growth areas identified in the final core strategy. In particular, Council officers are working closely with the PCT to try to identify where the need in the borough is the greatest and ensure new facilities are located where good public transport exists, or make arrangements to improve public transport.
26. The PCT are currently auditing health provision within Harrow and are likely to be able to better inform the Council later in the year as to where they are likely to make changes in health provision. The Council is aware that there is likely to be a focus on making better use of newer facilities in the borough, however, these do not necessarily 'fit well' with the proposed growth options. Similarly to transport, planning for health provision is critical.

### **D. Possible implications to developing the Core Strategy**

27. Given the changes in legislation and national guidance, the Council is aware that there is still much work to be done on the core strategy to ensure that it can confidently meet the Government's latest planning requirements. Specifically, the focus of the core strategy needs to be changed from that of a visionary document to one that is a deliverable plan for the borough up to 2025.
28. To assist boroughs with meeting the Government's latest guidance and achieve 'sound' plans, PINS has recently released new guidance, based on the lessons learnt from other boroughs who have prepared development plan documents. The main lessons are summarised as follows:
  - core strategies are where key decisions need to be made - strategic decisions cannot be left to subsequent DPDs;
  - growth options must be deliverable and realistic. The Council must be able to clearly demonstrate, through evidence that growth can be achieved and delivered;
  - evidence must be complete on submission of any planning documents to the Planning Inspectorate;



- core strategies must be flexible to adapt to changing future conditions;
  - core strategies must reflect national, regional and local guidance, as well as promote local controls for key issues in such a way that they do not just repeat existing guidance;
  - core strategies must be locally distinct and reflect what is important to the local community.
29. The work the Council is undertaking to improve the quality and robustness of the evidence base (refer to section C of this report) should help the core strategy to meet the principles of soundness set out in PPS12. All evidence now also needs to be complete prior to submission to PINS. All the work mentioned above and throughout this report needs to be completed to a high standard and utilise local knowledge and experience, which comes in short supply.
30. Therefore to ensure the Core Strategy is not found to be unsound at the public examination and to avoid a situation where the Council will have to withdraw and restart the process, additional time is needed to ensure the evidence base for the core strategy is robust and contains all relevant information to the level of detail now required. By simply keeping to the existing LDS time line (approved by GOL in November 2007), and increasing resources, there will still be insufficient time to ensure the evidence base is robust and the Council will run the risk that the core strategy will be found unsound.
31. However, given the development pressure on Harrow Town Centre and in response to comments received through the recent consultation on the core strategy, it is considered that more detailed guidance on the future development potential of the town centre is required. Therefore, any delays in the development of the core strategy will impact on the Council being able to better control development in high pressure areas.

#### Harrow Town Centre Supplementary Planning Document

32. To assist the Council with progressing the core strategy and provide guidance to better manage development in Harrow Town Centre, a Supplementary Planning Document (SPD) is proposed.
33. The benefit to the Council of preparing an SPD for the town centre is that it would contain specific guidance to help manage proposed developments (such as building height, density, building design, urban space and the impact on views

of Harrow on the Hill), until the core strategy is adopted. A SPD would also enable the Council to better integrate other initiatives such as the business improvement district and public realm plans. This work on the Harrow Town Centre SPD would also be used to inform relevant policy development in the core strategy, resulting in a more joined up local planning system.

34. In addition, the SPD would enable the Council to deliver planning guidance much sooner than through the core strategy and other LDF planning documents. This would help to allay some of the public's concerns that all the development will have been completed prior to the core strategy being adopted and resulting in the core strategy having limited impact.
35. Therefore, Council officers consider that a Harrow Town Centre SPD would enable the Council to better guide development in the town centre, while still progressing the core strategy (albeit on a slightly long timeframe). It is envisaged that the Harrow Town Centre SPD could be developed well before the adoption of the core strategy.

#### **E. Summary of proposed amendments to the local development scheme**

36. Therefore, to avoid unnecessary delays in the adoption of the core strategy and other planning documents, it is essential that the Council ensures it is able to demonstrate delivery, both of development within the borough in areas where people want to live and work, as well as the necessary infrastructure and services needed to support this growth.
37. To ensure the Council stands the best possible chance of the core strategy and other planning documents being found sound by the planning inspectorate at an examination in public, the following is proposed:
  - a) that the local development scheme (LDS) is revised to ensure more time is provided to prepare the evidence base to prove the core strategy is robust, according to recent changes by the government to planning legislation and guidance
  - b) that the local development scheme (LDS) is amended to include the revised timing for the Joint Waste DPD
  - c) that the Council commence work immediately on a Harrow Town Centre Supplementary Planning Document.

## F. Implications and risks of the recommendation

38. The following tables summarise the key implications and risks of the recommendations:

- Risk included on Directorate risk register? Yes
- Separate risk register in place? Yes

39. To mitigate the risk of the core strategy being found unsound, the following tables summarise the key implications, risks and opportunities arising from the recommendations:

<b>A. Specific Planning Implications</b>	
1. Locally distinct policies	<p>RISK: Policies not considered locally distinct.</p> <p>MITIGATION: The revised LDS timetable will allow officers more time to better develop local distinct policies for the final growth option areas, specifically for Harrow Town Centre and identified district centres in the core strategy.</p>
2. Clarifying the evidence base	<p>RISK: Need to investigate wider implications of growth options on the Borough.</p> <p>MITIGATION: Officers will have more time to ensure the evidence base is comprehensive and robust to withstand the scrutiny of the planning inspectorate at the core strategy examination in public. This will enable the Council to defend its plan and provide the necessary evidence to prove it is deliverable, in line with new Government guidance.</p>
3. Revised LDS Timetable	<p>RISK: Not updating the existing LDS.</p> <p>MITIGATION: The revised timetable will ensure the submitted core strategy better complies with the national planning guidance.</p> <p>The examination in public is likely to take place in the first half of 2010 (subject to approval by the planning inspectorate). Once submitted, the Core Strategy would be unable to be changed, unless by the inspector at the conclusion of the examination in public.</p>

	<p>However, the outcome of the examination in public for the core strategy will not be available prior to the next local government elections. Adoption is likely at the end of 2010 / beginning 2011.</p>
<p>4. Reliance on the existing UDP</p>	<p>RISK: Using the existing policies in the UDP<sup>2</sup> to manage the impact of development in Harrow.</p> <p>MITIGATION: The adopted core strategy is intended to give greater guidance within the future growth areas to enable the Council to better manage the impacts of development.</p> <p>However, until the core strategy is adopted detailed control policies can not be introduced to replace the UDP in its entirety. Therefore, the production of a Harrow Town Centre SPD will assist with managing development impacts during the interim period.</p>
<p>5. Housing and Planning Delivery Grant (HDPG)</p>	<p>RISK: Being assessed for the HDPG against the existing LDS.</p> <p>MITIGATION: To maximise the amount of grant available to the Council through the national HDPG, it is essential that plans are developed in accordance with the LDS. Failure to deliver planning documents within the agreed LDS timeline will mean a reduction in the amount of the HPDG. Therefore, to maximise the amount of</p>

---

<sup>2</sup> On the 28 September 2007, the Secretary of State directed the Council to delete 56 policies listed in the UDP, because they either repeated and / or are inconsistent with national or regional policy. The remaining policies are referred to as 'saved policies'. These policies are saved for a 3-year period (up to September 2010). The Council will continue to rely on policies in the London Plan to fill any policy gaps in the UDP, as per the deleted policies in 2007, or any updated national policy guidance.

It is implied that plans under the 'new' planning system would be implemented as soon as possible, replacing existing UDP policies. However, given the timeframe to introduce new planning controls, it is likely that the remaining UDP policies will need to be saved for a further 3-year period. Therefore, to save policies beyond the expiry of the 3-year period, Harrow Council will need to seek the Secretary of State's agreement to issue a direction to save them.

	funding available to the Council through the HDPG, the LDS needs to be updated to reflect the Council's new updated timeline.
--	---

<b>B. Wider Council Implications</b>	
1. Financial	<p>RISK: Increasing costs to fund robust evidence base.</p> <p>MITIGATION: While the ongoing costs of preparing the core strategy need to be contained within the current and future approved Planning Budget, given the high costs involved in preparing a robust evidence base, it is highly likely that additional funds will be required. (Refer to <b>Section G</b> below for indicative financial costs)</p>
2. Staffing/ workforce	<p>RISK: Retaining policy-planning staff.</p> <p>MITIGATION: Retention of experienced staff continues to remain a national challenge.</p> <p>The Council will need to try to recruit at least 2 suitably qualified policy planners, to meet the needs of work programme and timeline.</p>
3. Equalities impact	<p>RISK: Ensuring the core strategy meets the Council's equality needs.</p> <p>MITIGATION: The production of the documents included in the Local Development Framework will involve all sections of the community, and the documents will address the needs of the different groups within Harrow's diverse community in line with the Statement of Community Involvement.</p>
4. Legal comments	<p>RISK: Ongoing changes to national planning legislation and guidance.</p> <p>MITIGATION: The changes to national planning legislation and guidance are outside the control of the Council. As changes occur, the Council will need to assess the impact and whether any</p>

	additional work is needed to ensure existing documents comply with national and regional requirement.
5. Community safety	No specific implications arise out of this report.

<b>C. Planning Policy Opportunities</b>	
1. Updates to the London Plan	<p><b>OPPORTUNITY:</b> Review of the London Plan</p> <p><b>OUTCOME:</b> The new Mayor of London has identified that he intends to change the London Plan to:</p> <ul style="list-style-type: none"> <li>- reduce the emphasis on regional targets</li> <li>- setting a regional amount of affordable housing to be delivered (as opposed to a percentage)</li> <li>- support historic landmarks and local character</li> <li>- reduce crime through better built design</li> <li>- stretch the targets to reduce London's carbon footprint, introduce carbon reduction targets (as opposed to specify technologies)</li> </ul> <p>The revised LDS timetable will allow officers more time to better develop local polices to take account of the regional planning direction change.</p>

## **G. Financial Issues**

40. Indicative costs for the additional work on the evidence base may reach £200,000k. A further report will follow with detailed breakdown of the costs. A growth bid will be made as part of the MTFS this budget round. There will be funding required for two additional posts, which we are looking to fund from existing budgets.

## **H. Options Considered**

41. Given the changes to national legislation and planning guidance the existing LDS time line is not achievable. This report has not identified any other options to assist the Council to achieve the development of sound local plans. Updating

the LDS is a statutory requirement and this report proposes the Council amend it's existing LDS.

## I. Performance Issues

The following table summarises relevant planning performance indicators;

<b>Performance Check Key Questions</b>				
<b>Which performance indicators will be impacted by the proposal?</b>			<b>Current performance of indicators 08/09</b>	<b>Comments on the potential impact of how the core strategy can impact relevant indicators</b>
<b>Planning Performance</b>		<b>Description</b>		
<b>Indicator type</b>	<b>Ref</b>			
<b>Housing and Planning Delivery Grant</b>		Plan making, joint working, housing delivery	£55,000 awarded to Harrow on basis of HPDG for policy plan making categories.	Updating the LDS will ensure that the Council receives maximum funds from the HPDG.
<b>What is the current performance of these indicators?</b>		The core strategy will not improve the performance of the borough against the national indicators alone, but will help to better integrate borough policies from other directorates within planning policy. Thereby, helping to promote a positive planning outcome.		
<b>What impact will the proposal have on those indicators and key lines of enquiry?</b>		By carrying out a Harrow Town Centre SPD the Council will be able to introduce more specific planning controls to better manage the potential impact of new development on the town centre and address the relevant corporate priority. Additionally, to ensure the core strategy is robust and complies with recent government planning guidance, more time is required to gather a stronger evidence base. The preparation of a SPD will help to strengthen the core strategy by demonstrating local distinctiveness and deliverability, as well as mitigate the impact of the core strategy being adopted later than anticipated.		
<b>How much will the current performance be improved or other negative effects be mitigated?</b>				
<b>What is the potential impact on the CAA position?</b>		The LDS is the timeline that identifies how the Council will achieve the Government's place shaping agenda. Amending the LDS will enable the Council to prepare the necessary plans on a realistic time scale and continue to achieve well against the national 'place shaping' targets in the Housing and Planning Delivery Grant.		



### Section 3 - Statutory Officer Clearance

Previously cleared by officers below for the LDF Panel

Name: Sheela Thakrar	<input checked="" type="checkbox"/>	on behalf of the* Chief Financial Officer Myfanwy Barrett
Date: 18 August 2008		
Name: Abiodun Kolawole	<input checked="" type="checkbox"/>	on behalf of the* Monitoring Officer Hugh Peart
Date: 15 August 2008		
Name: Tom Whiting	<input checked="" type="checkbox"/>	Assistant Chief Executive
Date: 14 August 2008		

### Section 4 - Contact Details and Background Papers

Contact: Deborah Ganley, Senior Professional Policy Planning, Development and Enterprise, phone 02087366082

Background Papers: None.

## APPENDIX 1

### REVISED LOCAL DEVELOPMENT SCHEME – SUMMARY OF KEY DATES

Document Title	Brief Description	Public Consultation	Submission to Secretary of State	Examination in Public	Adoption	Notes
<b>Priority One</b>						
<b>Core Strategy DPD</b>	Sets out core spatial policies for the borough	June to July 2009	Nov to March 2010	June 2009 to Oct 2010	Jan to May 2011	
<b>Harrow Town Centre SPD</b>	To address particular issues relevant to development pressure on the town centre.	April-June 2009	Not applicable	Not applicable	Oct -Dec 2009	New SPD
<b>Joint Waste DPD</b>	To manage waste disposal across the West London sub region	July to Sep 2009	Oct to Dec 2010	March to July 2011	Oct 2011 to Jan 2012	
<b>Sustainable Building Design SPD</b>	Sets out how to make new buildings more energy and resource efficient	Oct 2008	Not applicable	Not applicable	Dec 2008 to Feb 2009	
<b>Accessible Homes SPD - Revised</b>	Sets out how to make housing more accessible for the community	Oct 2008	Not applicable	Not applicable	Dec 2008 to Feb 2009	Revising the April 2006 document to better reflect national and regional policy guidance
<b>Pinner Conservation SPD</b>	Sets out the area appraisal and management of the conservation area	April - July 2009	Not applicable	Not applicable	Dec 2009 – Feb 2010	Informal consultation on individual appraisals and management strategies prior to formal consultation as appendices to the SPD
<b>Planning Obligations SPD</b>	Sets out basis on which LBH will collect contributions	March to July 2009	Not applicable	Not applicable	Dec 2009	Early consultation proposed for October 2008
<b>Annual Monitoring Report (AMR)</b>	Monitors LDF, development trends and existing policy	Submitted to the Government annually, by the end of December, reporting on the monitoring year ending at March.				

<b>Priority Two</b>						
<b>Development Management Policies DPD</b>	DC policies against which planning applications will be considered	Sept to Dec 2011	Oct 2012	Nov 2012 to July 2013	Dec 2013	Formerly called Generic Development Control Policies DPD
<b>Site Allocation DPD</b>	Allocates main development sites including housing, employment, retail and mixed use.	Sept to Dec 2011	Oct 2012	Nov 2012 to July 2013	Dec 2013	Formerly called Delivering Development DPD
<b>Proposals Map DPD</b>	Shows spatial proposals of DPDs on an OS base map	Updated to reflect any area specific proposals and site allocations in Development Plan Documents				
<b>Stanmore Edgware Conservation SPD</b>	Sets out the area appraisal and management of the conservation area	Nov 2010 to Feb 2011	Not applicable	Not applicable	Oct 2011	Informal consultation on individual appraisals and management strategies prior to formal consultation as appendices to the SPD
<b>Harrow Weald</b>	Sets out the area appraisal and management of the conservation area	June to July 2011	Not applicable	Not applicable	Dec 2012 to Feb 2013	Informal consultation on individual appraisals and management strategies prior to formal consultation as appendices to the SPD
<b>Allotment &amp; Tree Strategy SPD</b>	Sets out basis for protecting allotments and trees	April – May 2009	Not applicable	Not applicable	Dec 2009 to Feb 2010	

## APPENDIX 2

### SUMMARY OF KEY CHANGES TO NATIONAL PLANNING POLICY LEGISLATION AND GUIDANCE

---

1. Specifically the Government has revised the Town and Country (Local Development)(England) Regulations 2004 and Planning Policy Statement 12. The changes to the 2004 Regulations and PPS12 came into force on the **27 June 2008** (after the Council had started the consultation on the Harrow Core Strategy Draft Preferred Options).
2. Planning Policy Statement 12 (PPS12) sets out (in more detail than in the Planning and Compulsory Purchase Act) the Government's policy on local spatial planning, which plays a central role in the overall task of place shaping and in the delivery of land uses and associated activities. The main changes to PPS12 are summarised as:
  - a single requirement to consult public and stakeholders before submission to the Secretary of State (the Council is no longer required to prepare and consult on issues & options or preferred options stages in a continuous process of community engagement prior to document submission);
  - new emphasis on the primacy of Core Strategy, specifically to be more specific, detailed, spatial and focused on the local area in order to ensure they are deliverable. There is now the opportunity to allocate strategic sites in the Core Strategy, in order to prove how the growth can be delivered and what support and infrastructure is needed within the plan period;
  - local authorities have been given more flexibility and encouragement to produce other plans, in addition to the core strategy, that are really needed for the borough (such as supplementary planning documents and best practice guidance). This will also help to identify 'local distinctiveness';
  - supplementary planning documents (SPDs) can now supplement not only policies in development plan documents (DPDs) but also policies in the Spatial Development Strategy for London (the London Plan) or national policy;
  - repackaging the tests of soundness; and
  - scope for production of non-statutory supplementary guidance by public sector agencies.
3. The Government has also issued Planning Policy Statement 3: Housing (PPS3) key parts of which took effect from 1 April 2007 and replaced Planning Policy Guidance 3: Housing (PPG3) and Circular 6/98 'Planning and affordable housing'. The main points relevant to the LDS are summarised as:
  - retaining the emphasis on developing upon brownfield land (the 60% target remains);
  - regional spatial strategies (the London Plan) have the key housing role, assessing demand and need, as well as suitable locations and overall targets. Local authorities need to interpret this into their local development frameworks (LDF);

- emphasis on LDF to assess provision in the first five to ten years of that 15- year plan period, not including windfall sites. The emphasis is on planning, monitoring and managing housing supply;
- payments in lieu of on-site affordable housing provision are only allowed where such payments can be 'robustly justified';
- emphasis is on achieving an overall mix of occupancy, which may well have the effect of some sites bearing proportionately more affordable housing to make up for a shortfall elsewhere;
- the overall national density is 30 units per hectare, but the PPS allows a lower threshold, and encourages a range of densities, all at or below the threshold. In reality, this is likely to have the aggregated effect of lowering the overall density of new developments.
- the housing threshold is simply more than 15 units. Local authorities are encouraged to consider lower thresholds if 'viable and practicable'.
- local authorities must consider the 'risks to delivery' of housing, including funding and economic viability.
- targets are to be set in LDF for different types of affordable housing in local area;
- there is new emphasis on achieving a low (ultimately nil) carbon footprint, and quality design;
- the recommendation to local authorities to consider recycling redundant employment land as housing in the 2004 Employment Land Reviews: Guidance Note is reiterated in PPS3.

4 A Consultation draft of PPS4 (Planning for sustainable economic development) was published in December 2007, and when finally adopted will replace the current PPG 4 which hasn't been updated for 15 years. Boroughs are advised to:

- plan positively and proactively to encourage economic development, in line with the principles of sustainable development, and develop flexible policies which are able to respond to economic
- use a wide evidence base to understand both existing business needs and likely changes in the market, to prepare policies to support sustainable economic development in their area.
- plan for, and facilitate a supply of land to cater for the differing needs of businesses and the expected employment needs of the whole community, which is flexible enough to be responsive to a changing economy or new business requirements. Local authorities should avoid designating sites for single or restricted use classes wherever possible and avoid carrying forward existing allocations where this cannot be justified.
- seek to make the most efficient and effective use of land and buildings, especially vacant or derelict buildings (including historic buildings
- seek to ensure that economic development, regardless of location, is of high quality and inclusive design which improves the character and quality of an area and the way it functions<sup>3</sup>.
- adopt a positive and constructive approach towards proposals for economic development, operating within the context of the plan-led system.

4. In addition to PPS12, PPS3 and PPS4 changes, the Government is currently consulting on amendments to Planning Policy Statement 6 (PPS6) Planning for Town Centres. This places greater emphasis on regenerating town, district and local centres. The main objectives of PPS6 is summarised as:

- planning for the growth and development of existing centres
- promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all
- enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice to meet the needs of the entire community, and particularly socially-excluded groups;
- supporting efficient, competitive and innovative retail, leisure, tourism and other sectors, with improving productivity
- improving accessibility, ensuring that existing or new development is, or will be, accessible and well-served by a choice of means of transport.
- promoting social inclusion, specifically to ensure that communities have access to a range of main town centre uses, and that deficiencies of provision in areas with poor access to facilities are remedied
- encouraging investment to regenerate deprived areas, creating additional employment opportunities and an improved physical environment
- promoting economic growth of regional, sub-regional and local economies
- to deliver more sustainable patterns of development, ensuring that locations are fully exploited through high-density, mixed-use development and promoting sustainable transport choices, including reducing the need to travel and providing alternatives to car use; and
- promoting high quality and inclusive design, improve the quality of the public realm and open spaces, protect and enhance the architectural and historic heritage of centres, provide a sense of place and a focus for the community and for civic activity and ensure that town centres provide an attractive, accessible and safe environment for businesses, shoppers and residents.

5. The Council needs to ensure that any future planning documents reflect the new requirements and proposed direction of change in planning legislation and government guidance.

## APPENDIX 3

### PLANNING POLICY UPDATES

---

#### Joint Waste Development Plan Document

1. The Joint Waste Development Plan Document is being progressed by Hillingdon Council (the lead borough) on behalf of the other West London boroughs for waste (Brent, Ealing, Hammersmith and Fulham, Harrow, Hounslow and Richmond). A consultant has been appointed to develop a joint planning document to manage waste in West London and an initial consultation paper is currently being developed. Formal consultation on waste issues is planned for the end of October – early December 2008.
2. The time needed to engage the consultants and develop the initial consultation report was underestimated. As a result all West London borough LDS timelines need to be revised to reflect a more realistic timeframe for developing and consulting on the Joint Waste DPD.

#### Housing Planning Delivery Grant

3. The Government has changed central government funding available to help support the delivery of planning at the local level. The Government now rewards local planning authorities for delivering their agreed timeframes in the LDS through the Housing and Planning Delivery Grant (HPDG). The HPDG includes an element relating to progress made against milestones in the LDS, along with joint working and housing delivery. The provisional HPDG allocation for these elements is in the region of £58,000. Therefore, meeting the agreed LDS timeframe will enable the Council to secure funding related to plan making.

#### Section 106 SPD

4. The Section 106 SPD will identify what level of contribution new development will have to make to the Council and partners in order to offset any impacts on the existing community. The officer leading on this has met with internal partners to discuss the impact of development on transport, arts/culture, leisure, affordable housing, economic development, education and transport. In addition, initial meetings have been held with Sport England and the PCT.
5. A draft of the document will be presented to the LDF Panel meeting on the 22 September 2008 for member comment, prior to being finalised for formal public consultation.

#### Sustainability SPD

6. This SPD is being developed in response to the global agenda on climate change, renewable energy and sustainable resource use. The officer leading on this is developing an initial consultation on the level of detail and guidance the community would like the Council to direct for all new and retrofitted development.

7. A draft of the document will be presented to the LDF Panel meeting on the 22 September 2008 for member comment, prior to being finalised for formal public consultation.

Accessible Homes SPD - revision

8. This SPD is being revised to ensure it is accurate, up to date, in line with national and regional planning guidance. A number of errors have been brought to the Council's attention and the document has been subsequently revised and being prepared for public consultation.
9. A draft of the revised SPD will be presented to the LDF Panel meeting on the 22 September 2008 for member comment, prior to being finalised for formal public consultation.



## APPENDIX 4

### OVERVIEW OF PROGRESS BY OTHER BOROUGHES

---

1. In London only 3 boroughs have had their core strategy and other planning documents found 'sound' by the planning inspectorate. The following table is a summary of the progress made so far by 7 other London Boroughs, that have submitted plans to the Planning Inspectorate:

<b>London Borough summary of plans submitted to the planning inspectorate</b>		
Borough	Documents	Outcome
Kingston upon Thames	Core Strategy	Approved (2008)
Havering	Core Strategy and Site Allocation DPD	Approved (2008)
Redbridge	Core Strategy, Development Control Policies DPD, Area Action Plan	Approved (2008)
Hounslow	Brentford Area Action Plan and Employment DPD	Decision pending
Richmond	Core Strategy	Submitted, to be determined
Havering	Area Action Plan	Submitted, to be determined
Brent	Core Strategy and Site Specific Allocation	withdrawn
Tower Hamlets	Core Strategy, Development Control Policies DPD, 3x Area Action Plans	withdrawn
Islington	Core Strategy	withdrawn

2. Within West London, all boroughs are at varying stages of preparing their core strategies for consultation prior to submission. The following table summarises what stage all the West London Boroughs are in their plan making process. Harrow is progressing to a similar timetable as Brent, Hillingdon, Kensington and Chelsea.

<b>Borough</b>	<b>West London plan making summary</b>
Brent	Core strategy submitted to Planning Inspectorate and withdrawn. Currently re-writing core strategy to re submit mid / end 2009.
Ealing	Second round of consultation on core strategy issues and options mid 2007, further consultation (preferred options) end of 2008, submission to Planning

	Inspectorate planned mid 2009.
Hammersmith & Fulham	Not progressing core strategy, focussing on area action plans.
Harrow	Completed core strategy draft preferred options consultation, assessing consultation outcomes with a view to start re drafting core strategy preferred options.
Hillingdon	Core strategy preferred options consultation completed, however re-consulting on limited issues within existing preferred options. Submission to Planning Inspectorate planned for 2009.
Hounslow	Starting work on core strategy. Emphasis to date on progressing the Brentford Area Action Plan and the Employment land DPD (both submitted to Planning Inspectorate, examination in public held, decision pending).
Kensington & Chelsea	Completed core strategy preferred options consultation, due to submit to Planning Inspectorate March 2009.