

LONDON BOROUGH OF HARROW

Meeting:	Unitary Development Plan Advisory Panel
Date:	18 March 2004
Subject:	The London Plan
Key decision:	No
Responsible Chief Officer:	Chief Planning Officer
Relevant Portfolio Holder:	Portfolio Holder for Planning, Development, Housing & Best Value
Status:	Part 1
Ward:	All
Enclosures:	None

Summary

The London Plan was published by the Mayor for London on 10 February 2004. It will provide the strategic context for Boroughs still to complete their replacement Unitary Development Plans, and more importantly for all Boroughs, inform the preparation of Local Development Frameworks. The Plan is also a material consideration in the determination of planning applications. This report sets out (1) the main messages of the London Plan, (2) the main changes in the Plan, and (3) the main policy issues of importance for planning in Harrow.

2. Recommendation (for decision by the Portfolio Holder for Planning, Development, Housing & Best Value)

2.1 To note the main messages in the published London Plan, and the main policy implications for Harrow set out in this report.

REASON: To ensure that the replacement HUDP can be adopted as expeditiously as possible, and for work on the preparation of the Local Development Framework to be started.

3. **Policy Context (including Relevant Previous Decisions)**

The UDP Advisory Panel considered a report on the Draft London Plan at its meeting on 24 September 2002 and agreed a Council response to the Mayor. It also received a report on the London Plan EIP Panel report on 16 September 2003.

4. **Relevance to Corporate Priorities**

The London Plan, now published, replaces Strategic Planning Guidance for London Planning Authorities (RPG3) and becomes the main regional framework document for the replacement Harrow UDP. The replacement Harrow UDP will need to be in general conformity with it before it can be adopted. The London Plan will therefore be setting the regional context for a key part of the Council's planning strategy, and relates closely to several of the Council's strategic corporate objectives, particularly those concerning enhancing the environment and developing a prosperous and sustainable economy in Harrow.

5. **Background Information and options considered**

THE MAIN MESSAGES OF THE LONDON PLAN

- 5.1 The main messages of the London Plan set down in an ALG briefing note, are as follows:-

Accommodating sustainable growth

- London is set to grow dramatically – by 800,000 people up to 2016. That is the equivalent of the new Wembley stadium filled to capacity nine times over. London's total population is projected to rise to 8.1 million by 2016.
- In parallel it is projected that there will be 640,000 additional jobs – concentrated in business services and in growing economies such as information technology, media, culture and green industries.
- Up to 30,000 new homes a year are needed to accommodate the increased population and to deal with the backlog of sub-standard housing. The Plan allocates targets to boroughs to achieve at least 23,000 a year up to 2006.
- A range of new workspaces (8 million sq metres of office floorspace alone) is needed.

Linking growth to public transport capacity

- Growth is to be focussed in the early years of the Plan in defined Opportunity Areas and Areas for Intensification, as well as existing Town Centres throughout London where there is capacity on the public transport network.

- The relationship between new development and public transport capacity is seen as critical – it will be developed further through the preparation, with partners, of the 5 Sub-Regional Development Frameworks (SRDFs).
- The Plan contains policies to improve the suburbs and many local transport schemes are proposed to improve the quality of life across the capital.

Securing a compact city, a better environment and high quality design

- The scale of growth envisaged can only be accommodated, without building on the Green Belt or on open spaces in London, by building to higher densities.
- The Plan promotes tall buildings where appropriate.
- Acknowledging the above requires better design, and the Plan also includes a range of policies to protect and improve the historic environment, the public realm, and green and water spaces as well as strategic views.
- There is a series of policies on climate change, energy efficiency, waste, biodiversity, noise, air quality and other environmental issues, and the Plan provides the spatial context for the Mayor's other Strategies.

Ensuring social and economic inclusion

- The plan strongly promotes social and economic inclusion, with policies targeted at different communities, smaller enterprises, black and minority ethnic businesses and the voluntary and community sectors more widely.
- It also promotes inclusive environments.
- The policies to ensure that 50% of all new housing is affordable are essential to greater social inclusion.
- The policies to ensure that Londoners obtain relevant training and skills to compete successfully for the new jobs are seen as vital, for social, economic and sustainability reasons.

Realism, sustainability and action

- Overall, the Plan focuses on making real and sustainable change by opening with an examination of the impact of the forces driving change in London and by closing with a detailed set of proposals for implementation
- The Plan recognises the need to work closely with existing partnerships in London and with the neighbouring regions.

THE MAIN CHANGES BETWEEN THE DRAFT LONDON PLAN AND THE PUBLISHED PLAN.

The published London Plan has been significantly re-structured when compared with the draft London Plan previously considered by Members. In summary, the main changes are:-

Policy I.1 - The Mayor's objectives (Page 6 of the Plan)

Six objectives for the Plan are set out under this policy:-

1. To accommodate London's growth within its boundaries without encroaching on open spaces.
2. To make London a better city for people to live in.
3. To make London a more prosperous city with strong and diverse economic growth.
4. To promote social inclusion and tackle deprivation and discrimination.
5. To improve London's accessibility.
6. To make London a more attractive, well-designed and green city.

UDP policies should take these objectives fully into account.

Policy 2A - Sustainable development (Page 38)

An overarching policy requiring that all policies in the Plan promote sustainable development is now included. The policy sets out the sustainability criteria that will be used by the Mayor in developing Sub-Regional Development Frameworks (SRDFs) and considering planning applications referred to him. Again, UDP policies should reflect the criteria included.

The Plan has a greater emphasis on being people-centred and relating fully to overall quality of life

There are new strategic priorities for Sub-Regions

The roles of Sub-Regional Development Frameworks (SRDFs) have been strengthened.

Implementation policies have been expanded and clarified.

The Plan is shorter and more policy-focused

Further changes have been made within each of the Chapters, as follows:-

5.2 Chapter 3A - Living in London (Pages 53-85)

The policy for increasing the supply of housing has been made far more ambitious – moving towards an output of 30,000 additional homes a year (as opposed to a minimum of 23,000 in the draft Plan).

The policies on affordable housing have been clarified, but the overall strategic target, that 50% of all additional housing should be affordable, remains.

There are new policies to enhance social infrastructure and support the voluntary and community sector.

The needs of London's diverse population have been integrated more fully throughout the plan.

5.3 Chapter 3B - Working in London (Pages 87-101)

The policy for mixed uses has been clarified.

The policy on Strategic Employment Locations has been clarified and strengthened including cross references to the sub-regional policies.

There is greater emphasis on the role and needs of small and medium-sized enterprises and of black and minority ethnic businesses.

5.4 Chapter 3C - Connecting London (Pages 103-129)

There is a new policy on sustainable transport in London, and there is an emphasis on reducing the need to travel.

Parking policies have been expanded to take in material that was in an Annex in the draft plan.

5.5 Chapter 3D - Enjoying London (Pages 131-153)

The policies for Town Centres have been strengthened and those for the suburbs clarified.

5.6 Chapter 4 - Cross-cutting policies (Pages 155-218)

The policy on waste strategy and targets has been made considerably more specific.

There is greater emphasis on, and a wider concept of, heritage.

The policies on the protection of London Views have been clarified, and two new views added (Richmond Park and Westminster Pier).

The policies for the Blue Ribbon Network have been moved into the body of the plan.

MAIN POLICY ISSUES OF IMPORTANCE FOR PLANNING IN HARROW.

For ease of reference, the main issues have been identified in the order in which they appear in the London Plan, as follows:-

Chapter 2 - The Broad Development Strategy (Pages 37-50)

The Plan reiterates that there are no Opportunity Areas, Areas for Intensification or Areas for Regeneration identified in Harrow (Policies 2A.2 -2A.4). Policy 2A.5 Town Centres, is concerned with developing a polycentric strategy for London's development by promoting London's town centres in accommodating economic growth, meeting the needs of Londoners and improving the sustainability of London's development. This is to be achieved through partnership working on the Sub Regional Development Frameworks (SRDFs).

The Suburbs (Page 45)

Policy 2A.6 Spatial strategy for suburbs, states that UDP policies should contain spatial strategies for promoting change within, and enhancing the quality of, suburban London, and then sets out detailed matters indicating that UDPs should be developed with particular attention to the policies in the Plan for town centres, employment, housing provision and design for a compact city. Members may recall that considerable concern was expressed by many outer London Boroughs about the lack of mention of the suburbs in 'Towards a London Plan', a weakness that was addressed in the draft London Plan. The continuation of this policy emphasis is particularly welcomed as it recognises the important role that suburban London plays in the city as a whole.

It is important to note paragraph 2.24 (Page 47)) (formerly Policy 2A.9) which states -'In collaboration with boroughs, the Mayor will prepare good practice guidance and a 'sustainable suburbs' toolkit to guide development policies in suburban centres, employment areas, neighbourhoods and heartlands.' It will be interesting to see what level of detail is contained in this guidance and toolkit.

The draft plan (para 2A.59) offered as a guide a distance of 800m around town centres as the area for higher densities and accessibility to good public transport. This has been removed in the published London Plan. This was a guide to indicate that town centres are easily accessible to the public and residents. Removal will give Harrow greater flexibility to judge the accessibility ranges in different areas of the Borough, allowing for an area based approach. A range of distances of, say, 400-800m is considered to be more appropriate, together with recognition of the other local factors such as character and local impact.

Town Centres (Page 44)

Discussion at the Examination in Public (EIP) focused on the need for the Plan to indicate a strengthened role for town centres in the plan. Policy 2A.5 Town Centres, recognising the strategic significance of town centres, has been introduced in Chapter 2. Further references to town centres have been introduced at relevant places throughout the plan.

Housing Policies (Page 54 of Plan)

Increasing the overall supply of housing

Policy (3A.1) states the Mayor will "seek the maximum provision of additional housing in London towards achieving an output of 30,000 additional homes per year from all sources", but qualifies this by further stating that housing provision up to 2006 will be monitored against a minimum target of 23,000 homes per year. The Boroughs' housing targets given in the plan are those for total capacity agreed with boroughs through the last London Housing Capacity Study. Members will recall that

the Council objected at the Panel to the inclusion of non-conventional capacity, but has since accepted the revised figure of 6,620 additional 'homes' and included it in the proposed modifications to the HUDP.

Paragraphs 3.11 and 3.13 point out that the 23,000 capacity figure will be reviewed as a result of the 2004 London Housing Capacity Study, and that additional capacity will be sought with a view to achieving 30,000 additional homes per annum. The intention is for revised figures to be incorporated in the London Plan by 2006.

Affordable Housing (Page 60)

Definition of affordable housing (Policy 3A.6 on Page 60)

Borough Affordable Housing Targets (Policy 3A.7 on Page 64)

Negotiating affordable housing in individual private residential and mixed use schemes (Policy 3A.8 on Page 65).

The Mayor sets a strategic target for affordable homes across London of 50% (Policy 3A.7), but it should be noted that specific borough targets have been removed in line with the arguments put forward by the ALG and Boroughs at the Panel. In individual schemes the Mayor states that 'targets should be applied flexibly..' (Policy 3A.8). In addition, clear guidance is now given that the 50% target includes affordable housing from all sources and not just that secured through planning obligations – it includes 100 per cent affordable schemes by housing associations, intermediate housing, non self contained accommodation, gains from conversions and from bringing long term vacant properties back into use, as well as new housing.

The prescribed 70:30 split for social housing and intermediate housing has not been deleted from the Plan, but this should not create any problems since most Boroughs have now recognised that an indication of priority needs will inform discussions with developers at the pre application stage.

Chapter 3B Working in London

2. Demand and supply of office accommodation (Page 88)

The main thrust of making London a more prosperous city remains, and the projected additional West London office space is the same as in the draft plan (1.1 million sq.m out of a total of 8.1 sq.m). The fact that the Crossrail proposals are not going ahead may reduce the attractiveness of suburban centres such as Harrow to meet their share of new built stock.

3. Manufacturing and Wholesale distribution (Page 92)

Policy 3B.5 acknowledges the importance of Strategic Employment Locations (SELs), and these have not changed. Annex 2 identifies Wealdstone Industrial Area as a Preferred Industrial Location, whilst the

Honeypot Lane (Stanmore) site is identified as an Industrial Business Park.

Chapter 3C –Improving travel in London

Closer integration of transport and spatial development (Page 103)

Integrating transport and development

The Plan contains Policy 3C.1 which specifically encourages “patterns and forms of development that reduce the need to travel especially by car”. There is a new section of the plan included in Chapter 2 on the importance of town centres (Policy 3C.23 deals with parking in town centres. Annex 4 to the Plan (Page A19) sets out parking standards which are unchanged from the draft Plan.

The deletion of the proposed phase II of Cross rail may reduce the attractiveness of Harrow as a London suburb to attract new businesses and economic growth. Therefore whilst it is suggested that areas around town centres are the most appropriate for higher density development and for a greater mix of uses, if these take place separately to developments in public transport, there is likely to be great pressure on the existing system.

Higher density development may lead to congestion of housing development and people in town centres with transport systems that do not have the capacity to cater for such high demand, (considering the fact that car free developments are being encouraged). This will also make Harrow a less attractive suburb for businesses to locate in, thus making our recommended employment targets difficult to meet. A balance in land use mix is vital for sustainability, as is the need for transport networks to support it.

Map 3C Proposed major rail transport schemes and development opportunities in London (Page 107)

Crossrail – The former Option 2 (Crossrail proposed through Harrow) has been deleted from the adopted plan to reflect the latest Central Government decision on the project.

Better Public Transport (Page 112)

The emphasis in the London Plan remains focused on sustainable means of transport. Apart from the Crossrail proposal (Phase 2) most of the major transport improvement schemes outlined in the draft plan appear in the adopted plan. The parking standards in Annex 4 of the Plan have not changed, apart from alterations to the text.

Improving London's open environment (Page 142)

Recognising the increasing importance of open space for the quality of London's residents, Policy 3D.7 - Realising the value of open space, although ambiguous in its title, aims to protect and promote London's network of open spaces, to realise the current and potential value of open space to communities, and to protect the many benefits of open space, including those associated with health, sport and recreation, children's play, regeneration, the economy, culture, biodiversity and the environment. Along with Policies 3D.8 Green Belt and 3D.9 Metropolitan Open Land strategic support is provided for many open spaces in Harrow. Given the pressures for new development, and housing in particular, the Plan recognises the need to identify areas of open space deficiency and priorities in addressing them (Policy 3D.10). The latter policy identifies the importance of audits of open space and the need to produce open space strategies to protect, create and enhance all types of open space (Policy 3D.11). (In this connection the urgent need to undertake an audit of open space and needs assessment in Harrow is currently being explored).

Biodiversity, Habitats and Species (Page 148)

Policy 3D.12 Biodiversity and Nature Conservation, sets down the Mayor's intentions to ensure a proactive approach to the protection, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy, and also identifies Sites of Metropolitan Importance for Nature Conservation. The successful implementation of this Policy relies heavily on Boroughs. Currently Harrow is one of only a handful of Boroughs which does not have a Biodiversity Action Plan. In addition, Policy 3D.12 requires Boroughs to identify sites of Borough or Local Importance for Nature Conservation. This is particularly pertinent to Harrow, as the results of the GLA's 2003 survey of nature conservation sites will need to be the subject of a public consultation exercise, and following that, consideration of how the site designations and boundaries are to be taken forward in the development plan.

Waste (Page 156)

Waste strategic policy and targets

The Plan recognises problems on data collection and discussion with stakeholders by identifying the need (Policy 4A.1) for an "early alteration to the plan to bring forward regional self sufficiency targets for individual waste streams". A consultation on the alteration to the waste planning policies is due during 2004.

Improving Air Quality (Page 162)

Policy 4A.6 relates to the implementation of the Mayor's Air Quality Strategy and highlights the means of securing reductions in pollutant emissions.. Members are advised that work is currently underway amongst West London Boroughs, with a view to producing supplementary planning guidance on this subject, recognising the need to consider policies for areas larger than individual Boroughs.

Improving the use of energy (Page 164)

Policies 4A.7-4A.10 cover a range of matters relating to energy efficiency, energy assessments and renewable energy. The increasing importance being attached to renewable energy is reflected in several of the Plan's policies.

Designs on London (Page 173).

The fundamental aim of the section is unchanged. It continues to recognise good design as central to all the objectives of the plan, and seeks to establish a policy framework in which to promote a more design-led approach to development. This very much reflects one of the key objectives of the HUDP. Policies encouraging sustainable design, inclusive environments, public realm improvements and respect for local context have been retained in essentially the same form as the draft plan, and this is to be supported. Welcome changes have been made to several policies, but particularly Policies 4.B1 and 4B.8. Policy 4B.1(Design principles for a compact city) now refers to the need for development to respect "London's built heritage", and to respect "character" as well as "local context and communities". In addition, the policy no longer requires Boroughs to "encourage, support and require" development to be considered against specified design principles, but to "seek to ensure" that development addresses those principles. This approach is more consistent with the HUDP and provides Boroughs with some flexibility in the interpretation and implementation of the policy. Policy 4B.8 (Tall buildings – location) has removed the requirement for Boroughs to promote tall buildings (this will remain with the Mayor) and introduces the need for development of this type to be acceptable in terms of design and impact on surroundings as well as other considerations. The policy also now recognises that Boroughs may wish to define areas within their UDPs that could be sensitive to tall buildings.

Housing Density (Page176)

Maximising the potential of sites

The London Plan maintains the density matrix (page 177) included in the draft Plan, with different densities for different locations, higher in town centres, and areas of good public transport accessibility. Members may

wish to note that local character is acknowledged in paragraph 4.45 which states: “The density matrix sets a strategic framework for appropriate densities at different locations. It aims to reflect and enhance existing local character by relating accessibility of an area to appropriate development and the number of car parking spaces that should be provided.”

Social inclusion and accessibility issues (Page 178)

Policy 4B.5 Creating an inclusive environment states that the Mayor will require all future developments to meet the highest standards of accessibility and inclusion. Under this policy, paragraph 4.50 states that a truly inclusive society demands an environment in which a diverse population can exist harmoniously and where everyone, regardless of disability, age or gender, can participate equally and independently, with choice and dignity. The design, construction and management of the whole range of buildings, spaces and places is a fundamental part of this.’

It is suggested that Boroughs should require development proposals to include an Access statement showing how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed. The Mayor has prepared draft Supplementary Planning Guidance on creating inclusive environments.

Affordability and accessibility are areas which the London Plan addresses with regards to sporting and housing provision, access to open spaces and leisure facilities, health care and transport. The need for convenient, cheap, safe and reliable public transport is recognised to be an important priority for older people (para 3.65). The need to increase London’s skills base to increase accessibility into employment is another area that the plan addresses.

Sub Regional Development Frameworks (SRDFs) (Page 222)

Overall approach to sub-regional development

Policy 5A.1 states that the Mayor, in partnership with other stakeholders in each of the five sub-regions, will bring forward SRDFs for implementing and developing the policies set out in the Plan. The Mayor has not accepted panel recommendation that SRDFs should have formal Development Plan Document or SPG status, and SRDF’s will be considered as non-statutory planning documents. SRDF’s may identify new policy areas, but it is unclear what status these new policies will have. One improvement in the London Plan is that it gives more detail on content of SRDF’s, plus identified strategic priorities for each sub region. It is important, however, that implementation of the plan involves real partnership working with the Borough(s), and not imposition.

West London sub-region

The sub-region map (p.257) is larger and clearer than in the draft and notes Harrow as a Metropolitan Centre and indicates the Preferred Industrial Location (Wealdstone) and Industrial Business Park (wrongly located in the Stanmore Park area rather than Honeypot Lane). The section on town centres in West London (p.263) comments on the specific roles of a number of centres and then states: “Opportunities for intensification at other town centres in West London, including Harrow, should be exploited.” This is a significant addition from the draft London Plan, as far as Harrow is concerned, and provides strategic support for the emerging plans for Harrow Town Centre.

The section on North London sub-region includes an important reference (p.271) to Brent Cross: “The Sub-Regional Development Framework [for North London] will guide the evolution of Brent Cross regional shopping centre into an integrated town centre. This should not compromise the potential of Wood Green, Wembley and Harrow and other centres to provide sustainable access to higher quality goods and services.” It also stipulates (p.269) that the redevelopment of Brent Cross as a town centre “..should be informed by an independent assessment of the need for and impact of further retail development.” which will further protect Harrow’s interests.

Planning Obligations (Page 286)

Policy 6A.4 on priorities in planning obligations notes the wish of the Mayor “to develop with boroughs a voluntary system of pooling for the provision of facilities related to proposed developments”. The idea of the Mayor seeking secondary legislation to enable him to become a party to Section 106 agreements is maintained in the section on first review of plan and is identified as one of the key changes which the Mayor will discuss with government. (Para. 6.98)

Monitoring and Review of the Plan (Page 307)

Policy 6B.2 Measuring progress, involves the Mayor publishing an Annual Monitoring Report that measures progress on the London Plan against a set of specific targets. The expectation is also that Boroughs should include borough-wide targets that reflect the Plan’s strategic targets at the local level in their Community Strategies and UDPs. Whilst supporting the need for effective monitoring to inform progress on implementing the Plan, due recognition needs to be given to the fact that Boroughs will be expected to provide much of the information. This comes at a time when the need to provide a comprehensive evidence base for the LDF process is also being promoted.

First review of or alteration to the London Plan (Page 316)

Whilst publication of the London Plan initially has primary importance for the Council in securing the adoption of its replacement HUDP, work is already being undertaken towards the first review of the London Plan. The Council will be required to comment on a number of matters in the next 18 months or so. Paragraph 6.97 (Page 316) sets out an indicative programme for the first review or alteration, as follows:-

- completion of draft Sub-Regional Development Frameworks by the end of 2004.
- completion of the new Housing Capacity Study by end 2004.
- consultation on alteration to waste planning policies during 2004, publication by mid 2005.
- consultation on first review early 2005.
- draft plan by late 2005.

In addition, a programme of supplementary planning guidance is being progressed in relation to the London Plan, most of which will have relevance for planning in Harrow. Annex 6 (Page A35) sets out an indicative timetable for the production of the following 11 SPGs:-

- 1 Accessible London (draft published July 2003)
- 2 Industrial Capacity (draft published September 2003)
- 3 Housing provision (draft to be published March 2004)
- 4 Urban design principles (draft to be published March 2004)
- 5 Affordable housing (draft to be published March 2004)
- 6 Sustainable construction and design (draft to be published April 2004)
- 7 View framework management (draft to be published April 2004)
- 8 Land for transport functions (draft to be published April 2004)
- 9 Renewable energy (draft to be published May 2004)
- 10 Meeting the spatial needs of London's diverse communities (draft to be published May 2004)
- 11 Retail need assessments (draft to be published July 2004).

Annex 1 London's strategic town centre network (Page A1)

The metropolitan status accorded Harrow Town centre is unchanged (table A1.1 on Page A3) and there is no change in terms of the list of centres included in the Plan as opportunity areas.

6. Consultation

6.1 The Council will need to give further consideration to the implications of the London Plan for both the replacement HUDP, and the LDF when work is commenced on that. With the increased emphasis

being given by the government to community involvement, the contents of the London Plan are likely to be subject to considerable comment by Council partners, business and the community.

7. **Finance Observations**

There are no immediate financial implications from the publication of the London Plan.

8. **Legal Observations**

8.1 The replacement HUDP will need to be in general conformity to London Plan now that it has been published. Members will already be aware that it will be a material consideration in the determination of planning applications.

9. **Conclusions**

Having made representations to the Mayor at previous consultation stages, and voiced a number of concerns, the Council must now focus on some very important matters emanating not only from the Plan's publication and its implications for the HUDP, but importantly relating to its implementation, monitoring and review. Besides the fundamental issue of general conformity (see other report on the agenda), officers will be embarking on a considerable amount of work associated with the Plan. Some of these are listed under the heading 'First review of or alteration to the London Plan (Page 316)', above. One of the key challenges in the development of the Local Development Framework (and its constituent documents) for Harrow, will be to ensure that the scope for possible conflict with the London Plan Review is minimised.

10. **Background Papers**

The London Plan – Spatial Development Strategy for Greater London, Mayor for London, Greater London Authority, February 2004
Reports to the UDPAP 24 September 2002 on Draft London Plan, and 16 September 2003 on the London Plan EIP Panel report.
The London Plan – Initial Briefing Note (ALG) – 12 February 2004

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