

Meeting:	Overview and Scrutiny Committee
Date:	12 th October 2009
Subject:	Local Development Framework Core Strategy – Preferred Option Document
Responsible Officer:	Andrew Trehern – Corporate Director Place Shaping
Portfolio Holder:	Councillor Marilyn Ashton – Portfolio Holder for Planning Development and Enterprise
Exempt:	No
Enclosures:	Appendix 1 – Draft Harrow Core Strategy Preferred Option – Regulation 25 Consultation Appendix 2 – LDF Evidence Base Studies

Section 1 – Summary and Recommendations

The Core Strategy is the Council's top priority for the Local Development Framework (LDF). It provides the long-term spatial vision, strategic objectives and overarching policy framework to guide development and change within Harrow over the next 15 years and beyond and sets the context for all other LDF documents the Council intends to prepare. This report sets out the context and the work that has been carried out in progressing Harrow's LDF. It outlines the changes that have occurred since the Council last went out for consultation in July 2008 on two options for growth, and how these changes have been managed and taken into account in producing the new Strategy, which is to be the subject of public consultation.

Recommendations:

That the report be noted and that the comments of the Committee be forwarded to Cabinet.

Reason: (For recommendation)

It is a corporate priority to prepare a series of statutory planning policy documents, which together comprise the Local Development Framework (LDF) for the Borough that will eventually replace the existing Unitary Development Plan (adopted in July 2004). The Core Strategy Preferred Option is being reported to Cabinet on 22nd October and then to Full Council on 29th October for approval for the purposes of public consultation.

Section 2 – Report

A. Context

- A1. The Local Development Framework (LDF) comprises a suite of planning policy documents that will guide the quantity, quality and location of new development in Harrow, eventually replacing the outdated policies of the current Unitary Development Plan 2004 (UDP).
- A2. The Core Strategy is the most important part of the LDF. Government sees the Core Strategy as the principal means by which to give effect to the Council's 'place shaping' role. It is a key delivery document underpinning the land use aspects of the Sustainable Community Strategy and the Council's other various strategies relating to housing, climate change, tourism, Green Belt management etc, and those of our public sector partners.
- A3. The LDF and, in particular, the Core Strategy is therefore very different in form and function to the UDP. The purpose of the Core Strategy is to set out where, when and how Harrow will grow, and to allow change to happen in a managed and effective way. It is to be developed with the community and stakeholders and is to set out a clear vision and spatial strategy for the future of places within Harrow, having regard to the key issues affecting the Borough and supported by the findings of evidence based studies. It then translates these into a set of strategic land use objectives and policies that explain how the Council, working with the development industry and public and private sector agencies, will deliver and monitor achievement of the spatial strategy.
- A4. The Core Strategy identifies areas where there will be significant change both in terms of new uses and the quantum of development. It also sets out the main terms of the Strategy. It does not however allocate specific sites or include specific detailed policies or proposals for sites, areas or for use in the control of development. These tasks are assigned to the Development Management Policies DPD, the Site Specific Allocations DPD, and the proposed Area Action Plan respectively, all of which are programmed to be prepared shortly after adoption of the Core Strategy.
- A5. This report sets out the context and the work that has been carried out in progressing Harrow's LDF. It outlines the changes that have occurred since the Council last went out for consultation in July 2008 on two options for growth, and how these changes have been managed and taken into account in producing the new Strategy. In particular, the following sections detail how the Preferred Option takes account of recent and emerging changes in national policy, the emerging evidence base, and the need to strengthen the relationship to the Sustainable Community Strategy and the objectives of Council's other strategies; responds to the emerging London Plan and to the comments and concerns raised through previous consultation, and to the outcomes of the sustainability appraisal.

B. Recent changes to the plan-making process and the content of the Core Strategy

- B1. The process for preparing LDF documents is governed by the Planning and Compulsory Purchase Act 2004, the accompanying Regulations, and by Government guidance in Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning (June 2008). The Core Strategy and all other development plan documents that form part of the LDF have to meet the Government set tests of soundness.
- B2. In light of experience since the introduction of the new development plan system in 2004, the Government reviewed and revised PPS12 in June 2008 to further streamline the plan making process and to clarify the role of the Core Strategy. In terms of content, the Core Strategy is now to make sufficient provision for housing, and most other forms of development, for at least fifteen years from adoption. There is also to be a greater focus on ensuring the spatial strategy arrived at is deliverable, gives effect to the land use priorities of the Sustainable Community Strategy, and is supported by robust management and monitoring arrangements.
- B3. Changes to the process for how development plan documents are to be prepared have also been introduced. They remove the requirement for formal consultation on Preferred Options and introduced a new requirement for pre-submission publication prior to submission to the Secretary of State. The revision to PPS12 also streamlined the tests of soundness for Development Plan Documents, which must now be “justified, effective and consistent with national policy”. ‘Justified’ is defined as being founded on a robust and credible evidence base and the most appropriate strategy when considered against reasonable alternatives. ‘Effective’ is defined as deliverable, flexible and capable of being monitored.
- B4. In addition to the significant changes made to the plan making process, brought about by the revision to PPS12, there have also been a number of significant changes to national policy. These include the introduction of the Planning Act 2008; draft Community Infrastructure Levy Regulations; a supplement to PPS1 on addressing the impacts of climate change; and consultation on a draft PPS4: Planning for Prosperous Economies, which would replace the existing PPG4 Industrial, Commercial Development and Small Firms as well as PPS6: Planning for Town Centres.
- B5. The above changes, as well as further significant changes to the national and regional planning context (detailed later in this report), prompted the LDF team to seek clarification from the Planning Inspectorate as to whether they considered the Council should undertake further consultation on a preferred option. Following a Planning Inspectorate visit in July 2009, to review and advise on the Council’s progress on the LDF, Planning Inspector Roy Foster confirmed that such an approach would be appropriate in light of:

- a) the changes to PPS12 and the implications of this to form and content of the Core Strategy and how its soundness is to be judged;
 - b) the proposals for a new London Plan and the need for the Core Strategy to be in conformity with and to give effect to regional spatial policy;
 - c) further work undertaken on the evidence base that informs and underpins the preferred option;
 - d) the fact that the preferred option being pursued, whilst evolved from and still sharing many of the elements of the two growth options previously consulted on, is to a large extent a new option that has not been the subject of public consultation and comment;
 - e) the intent and spirit of new planning system - to engage community opinion and comment throughout the plan's preparation – means the public should be given the opportunity to further inform and influence the content of the final submission document; and
 - f) the need for the Council to satisfy itself that the preparation of the Core Strategy complies with the current revised Regulations.
- B6. In light of the Planning Inspector's views, the appended Preferred Option document has now been prepared and is scheduled to be considered by the LDF Panel and Overview and Scrutiny, before being put to Cabinet for approval ahead of the meeting of the Full Council on 29th October. Subject to approval by Full Council, public consultation on the preferred option is scheduled for later this year before moving on to the next stage of the Plan's preparation (the pre-submission publication stage in March 2010).
- B7. The identification of a preferred option for growth or a preferred approach to any planning matter does not make the Preferred Option document a first draft of the plan that would carry any commitment or weight. The Preferred Option document is an opportunity for the community and stakeholders to engage in further dialogue and contribute towards the publication of a pre-submission version.

C. The emerging new London Plan

- C1. In addition to the requirement that development plan documents be consistent with national policy, the Core Strategy must also be in general conformity with the London Plan.
- C2. In April 2009 the new Mayor of London signalled his intention to prepare a new London Plan. As a precursor to the formal production of the new Plan the Mayor published 'A new plan for London – Proposals for the Mayor's London Plan', setting out the initial areas and potential changes likely to be dealt with through the review. The key proposals and the likely implications of each for Harrow were the subject of a report to the LDF Panel meeting of 29 July 2009, along with the Council's submission (as part of the West London Alliance) to the Outer London Commission. These headings will form part of ongoing consultation and discussions with the GLA as both London Plan and LDF policy develops.

Strategic Outer London Centres: For Harrow and others, which lack the capacity, existing business base and infrastructure to accommodate a super hub, there is a risk that the area would not be the focus for significant GLA family investment.

Town Centres Review: Potentially significant implications for Harrow Town Centre due to recent underperformance relative to its neighbouring centres, notably Uxbridge, Brent Cross and Watford. Re-classification of Harrow would adversely impact on the future investment decisions of both the public and private sectors.

Strategic and Other Industrial Locations: More rigorous promotion, management and protection of strategic industrial locations has implications for Harrow, which has lost significant industrial land to residential use over the previous London Plan period. Need to align this approach with the findings of the employment land review and any identified surplus in existing strategic industrial land provision.

Opportunity and Intensification Areas: consideration of new locations for such designations, especially in outer London, provides an opportunity for Harrow to achieve regional visibility that will assist in targeting investment and support towards the realisation of the Boroughs spatial objectives.

Tall Buildings: With greater emphasis being placed on the context and surroundings Harrow will still be required to consider the role of tall buildings in delivering local needs for housing and commercial uses.

Affordable Housing: the intention to replace the existing 50% Borough-wide affordable housing target and tenure split to 60:40 gives a greater emphasis to the provision of affordable family-sized housing. Harrow will need to try and align regional requirements with local needs for affordable housing provision, taking account of development viability.

Gypsies and Travellers: Mayor proposes to provide strategic guidance and targets for the provision of pitches to meet projected demand. Need to assess whether the apportionment target reflects the physical capacity of the Borough to accommodate additional pitches.

Quality of Life: Controls on 'back garden' development, minimum internal space standards, greening of homes, the retention of Accessible and Lifetime Home Standards, and the continued strong protection for the Green Belt and Metropolitan Open Land plus greater recognition to the need to protect local architectural and historic character. These aspirations will need to be reflected in LDF policy.

D. Comments to previous consultation on options for growth

- D1. The Council consulted the public in September 2006 and January 2007 on the Issues & Options and Strategic Priorities documents, and again in July 2008 on two Preferred Options for growth, namely:

Option A – Harrow Central Growth Corridor. This option sought to concentrate the majority (over 60%) of future development to a tightly drawn boundary around Harrow Town Centre, and 25% to be accommodated within Wealdstone, Rayners Lane, South Harrow and to parts of Kenton and Edgware, with just over 10% to be provided for within the remaining district centres and the rest of the Borough.

Option B – Public Transport Growth Focus. This option sought to provide for a slightly more dispersed pattern of growth based upon how accessible an area was by public transport. Given the high public transport accessibility of the central part of the Borough, Option B would still see high levels (50%) of development being provided for in Harrow Town Centre and 25% to Wealdstone, Rayners Lane, South Harrow and parts of Kenton and Edgware. However, it would allow development to radiate further out from these centres, creating a transitional zone between low and high-density areas, and would make provision (in the region of 25%) for development in areas of more modest levels of accessibility, thereby spreading the impacts of development (both positive and negative) across more of the Borough.

- D2. 147 responses were received to the consultation. Of the two growth options put forward, opinion was split, with 26% preferring Option A and 42% Option B. Significantly, nearly a third stated that neither option was supported. Of those who chose neither option, most were of the opinion that Harrow was already overcrowded, infrastructure and services stretched and therefore questioned the need to cater for more growth, especially at the levels required by the London Plan, which they felt would result in unacceptable environmental and social impacts.
- D3. Supporters of Option A considered growth and development of the scale and nature proposed within Harrow town centre was crucial if genuine regeneration of the area was to be achieved. They considered that this option was consistent with national and regional policy to promote and direct intensified mixed use (retail, office and residential) development to the main town centres in support of their function and vitality, that it would continue to promote sustainable transport, and would see much needed investment in physical and social infrastructure within the central area to serve new development and the wider Borough.
- D4. Most supporters of Option B cited their concerns with Option A as their main reason for selecting this option. Such concerns related to the provision of tall buildings and the adverse impact of this on the setting of Harrow-on-the-Hill, increased car use and traffic congestion in and around the town centre, and a concern that intensification and overcrowding would place further burden on existing services and facilities that most considered to be at capacity resulting in increased social and environmental problems. They also considered Option A would result in the provision of mostly flatted schemes that would not deliver the types of housing needed or provide for truly affordable housing, as they felt such schemes were more likely to be shared equity. In terms of benefits to be derived from pursuing Option B, most cited it would spread housing provision in a more balanced way, allowing for regeneration of a greater number of areas of Harrow.
- D5. While nearly all respondents considered the proposed draft vision and cross-cutting objectives to be laudable, a common criticism was that they did not believe either growth option proposed would achieve these outcomes, and aligned to this, that the document gave insufficient detail to understand the methods, commitments and contingencies needed to be put in place to demonstrate how, through either option, the objectives would be met.

- D6. On a more positive note, none of the respondents disputed the assessment of the key issues affecting the Borough. Rather many of the comments received reaffirmed the need for affordable family sized housing; the protection of the Green Belt, MOL and open space, and the need to address the impacts of climate change through managing natural resources, reducing reliance on cars, improving the energy efficiency, reducing waste and increasing recycling.

E. The Preferred Option document

- E1. With London and Harrow's population steadily increasing, and forecast to continue to grow, the LDF is required to make provision for future population and housing growth in the Borough. The challenge for Harrow is to manage that growth, and the change it brings, while still preserving the values, character and environment that its residents and businesses value.
- E2. Having regard to all the matters raised in the previous sections, the Council is therefore promoting a Preferred Option that would see the central area of the Borough identified within the LDF and the new London Plan as an Intensification Area, where significant levels of growth and change would be focused and co-ordinated. Within the remaining developed urban areas of the borough, the Strategy would provide for more natural levels of growth, focused upon bringing forward redevelopment and renewal of identified and allocated existing brownfield sites. Within this area of more natural growth, the scale and form of residential or mixed use development to be achieved on a particular site will be determined by the site's location, its accessibility, the surrounding densities and the need for development to respect and enhance the urban environment and character.
- E2. The central area within Harrow was identified as a potential Intensification Area because it has:
- The highest public transport accessibility within the Borough;
 - Good existing utilities infrastructure;
 - Capacity to grow, including some significantly large strategic opportunity sites;
 - Adequate and improving provision of services and facilities;
 - The ability to enhance links to open space, recreation and leisure facilities;
 - Market interest; and
 - An environment not threatened by growth - providing real opportunities to achieve regeneration and renewal that can substantially benefit and improve the area, as well as being a focus for regional and central government agency investment.
- E3. As such it is an area that can support significant growth and change, and is suitable for increased residential and mixed use growth based around the town centres that already have (or will have) the transport, schools, open space, community services, shops and employment base needed to create vibrant town centres and renewed communities.

- E4. With regard to business development, the Intensification Area includes the main retail and office areas, and the majority of the key strategic industrial and business land within Harrow to ensure the creation of integrated and sustainable communities. These designated and non-designated employment areas can support intensification and growth in job numbers, including increased movements of workers, customers and goods that the extra jobs will bring.
- E5. While provision needs to be made for increased densities within the Intensification Area, it is not a matter of development at all costs. A key tenet of the Preferred Option is to ensure the potential impacts of intensification are offset through requirements that ensure development is built to higher design and environmental standards, and that the investment potential and benefits to be derived from increased development and change are captured and maximised to ensure that the growing central area community has the best possible access to:
- New jobs and opportunities for training and skills development;
 - A quality urban design and built form that creates safe, attractive environments that people and businesses value and that promote further private investment;
 - An enhanced public realm, including improved streetscapes;
 - Improved provision in physical and social infrastructure and facilities that are highly accessible to new and existing residents;
 - Open space assets;
 - Provision of community based combined heat and power (CHP) schemes.
- E6. The remaining areas of more natural growth (i.e. the remaining developed parts of the borough) seek to recognise that some parts of the Borough are not suitable for increased growth. These are more traditional suburban communities that exhibit significant character, environmental or heritage qualities that cannot support higher densities, or are areas that currently do not have the services or facilities to cater for increased growth. However, as the Strategic Housing Land Availability Assessment and Harrow's Housing Trajectory demonstrates, there are a significant number of existing sites located throughout the suburban area, which offer the potential for redevelopment to meet the need for a range of housing types in different forms of tenure.
- E7. The Strategy therefore provides for development of these strategic brownfield sites as and when they become available. This includes a number of sites within the district and local centres, where mixed use development will continue to be promoted in recognition of the need to maintain the important role and function of these centres in providing a sense of community and in the provision of local shops and services.
- E8. Within the areas of natural growth, the density, type and scale of development to be achieved on an individual site will depend on the accessibility of the site to public transport and the local context, including the local built form and character and prevailing densities as well as environmental, amenity and cultural values and qualities that contribute to an areas sense of place.

F. How the Preferred Option responds to the changes in national policy

- F1. The changes to the plan-making process, and the introduction of new Acts, Regulations and national policy guidance have significant implications for the form and content of the Core Strategy. It requires constant vigilance and regard to be had to ensuring the existing and emerging evidence base remains valid and covers all necessary requirements, and that the spatial strategy, objectives and policy wording adequately reflects and is consistent with national policy. Where inconsistency is identified it requires revisiting of the relevant parts of the evidence base and the draft Core Strategy, with knock on effects in terms of the timetable, costs and resources.
- F2. Substantial progress has been made on the evidence base assembled to support and inform the preparation of the Core Strategy. While the vast majority of these studies are now complete, the evidence base is still very much a work in progress.
- F3. To take account of changes in national policy, as well as emerging best practice, and to reflect recent changes in the economic climate, a number of older studies regarding future retail and employment land requirements are currently being reviewed and updated to ensure they remain current and robust. There are a number of other studies that are underway or close to being finalised and still more programmed for completion following consultation on the Preferred Option.
- F4. These studies are important in determining the current and likely state of the environment in Harrow, in providing a local context to policy, and in demonstrating compliance with national policy requirements. The table provided in Appendix 1 identifies all of the evidence base studies and the current status of each. As each study is completed it is made available on the Council's website to enable the public and stakeholders to review, scrutinize and provide feedback, at any time, on the methodology and data used, the analysis of results and the conclusions reached. In making these studies publicly available it is hoped that this provides for a significant degree of transparency, allows for an open exchange of information and is also a reasonable approach to testing the robustness of the evidence base prior to it being the subject of formal examination in public alongside the final version of the Core Strategy.
- F5. In addition to preparing a robust evidence base to inform policy, the revised PPS12 also requires the Core Strategy to be effective and deliverable. This is especially challenging when set against the need for the Core Strategy to give effect to the Sustainable Community Strategy, which is very much based on community aspirations.
- F6. To respond to the requirements of PPS12, and to better demonstrate the link between the Core Strategy and the Sustainable Community Strategy and other Council and public sector partners strategies, the Preferred Option makes reference to show how the relevant strategic policy give effect to or seek to implement the spatial land use requirements of each of these strategies.

- F7. To strengthen the relationship further between the implementation of the Core Strategy and the delivery of the Sustainable Community Strategy, the Preferred Option also draws extensively on the indicators of the Local Area Agreement, thereby enabling greater alignment when monitoring the effectiveness of each policy in achieving the outcomes sought by both strategies.
- F8. With regard to delivery, the Preferred Option recognises that planning for growth needs to be a partnership between Harrow Council, the community, government agencies and other organisations whose work affects communities. It seeks to provide more certainty as to what can be delivered over the plan period by revising the vision to make this more explicit about what it is the Strategy seeks to achieve by 2026. It also outlines the Council's engagement with the GLA, Design for London and the London Development Agency and other delivery partners, as well as our intention to engage and work with the community, landowners, and developers to plan for and deliver the future of the Intensification Area and 'place shaping' within the areas of natural growth. It also acknowledges the Council's role as a landowner, which has significant land holdings within the central area and elsewhere that could provide the catalyst for urban renewal, if this was not being achieved through the property development market.
- F9. The Preferred Option also places a greater focus on the key requirement that development and growth must be matched by delivery in physical and social infrastructure. The creation of sustainable communities and the achievement of the Core Strategy vision and objectives relies equally on development to provide for enhanced social and physical infrastructure as much as new homes and jobs.
- F10. Work is underway on identifying, in consultation with service providers, the infrastructure requirement and costs to support development within the borough to 2026. This study looks at a broad range of infrastructure requirements, and takes account of existing provision against current and projected populations. Account is also to be had to the changing needs of the population based on our best understanding of what these future needs may be. It is intended that the outcome of the study will result in an Infrastructure Delivery Plan (IDP) tied to the Core Strategy; the Sustainable Community Plan; the Local Area Agreement; and the Planning Obligations SPD or any future arrangements for Community Infrastructure Levy.

G. How the Preferred Option responds to the emerging London Plan

- G1. The Council has actively engaged the GLA to better understand how the Harrow Core Strategy can best give effect to the emerging new London Plan. While the Council, along with most outer London boroughs remains opposed to the concept of super hubs, the vast majority of the changes proposed are considered to be more applicable to an outer London borough setting than those of the existing Plan.

- G2. With regard to the proposal for super hubs, the Council considers such an approach as being unsustainable due to the potential to undermine the regeneration of existing outer London centres and the potential for disproportionate investment funding. The Council, through the West London Alliance, therefore submitted an alternative for the Outer London Commission to consider; an economic framework for outer London based on a constellation of town centres and other business locations rather than a few large hubs. The Outer London Commission (OLC) agreed and reported to the GLA that the alternative was preferable and should be pursued. In recognition of OLC support, the Preferred Option seeks to give support to the alternative approach proposed by pursuing the designation of the Borough's two main accessible town centre and key employment areas as an Intensification Area, thereby identifying this area as key node in the network of outer London constellations.
- G3. A further reason, and significant driver, for seeking the inclusion of Harrow's central growth area as a designated Intensification Area in the new London Plan, was to ensure Harrow Town Centre retained its metropolitan centre status. Through the Council's involvement in the GLA's Strategic Housing Capacity study, significant strategic opportunity sites had already been identified in the area that could provide sufficient levels of development and commercial investment to meet the requirements for an Intensification Area and to maintain, over time, Harrow Town Centre's ranking in the hierarchy of London centres.
- G4. The Intensification Area was also seen as a key means by which to engage with the GLA on a number of other London Plan proposals, including the implementation and delivery of Harrow's strategic housing requirement, the management of key industrial and employment sites, the role of tall buildings in a Harrow context, and the achievement of quality of life outcomes. Following a series of meetings with the GLA, it was agreed there was significant potential for the proposed central growth corridor to be designated as an Intensification Area. This designation is therefore being taken forward in the Preferred Option as well as the draft London Plan.
- G5. Through widening the boundary of the Intensification Area to take into account Kodak and the Wealdstone Industrial Area, this sought to respond to the London Plan proposal to promote, manage and protect these strategic employment sites. The Preferred Option recognises the important role these strategic sites play in meeting many of the strategic social and economic objectives of the Sustainable Community Plan and the Core Strategy. These existing sites offer significant potential for greater intensification of employment use, and by supporting and investing in their continued role and function, in addition to delivering growth in local jobs, it also maintains the Borough's ability to respond to any future increase in demand for employment uses.

- G6. With regard to the delivery of Harrow's strategic housing requirement, the broad location to be included in the Intensification Area designation has potential to fulfil a significant proportion of the Borough's future housing need through a range of strategic opportunity sites with development potential for higher density residential and mixed use development. Its designation in the London Plan also ensures Harrow has visibility in a regional context and can use this to lever in support and funding from the GLA, GLA family members (London Development Agency, Transport for London etc), and central government agencies (Environment Agency, Homes and Community Agency etc) towards implementation and delivery.
- G7. In response to the proposal regarding suitable locations for tall buildings, the Preferred Option recognises there is a role for moderately tall buildings within the Intensification Area but places significant emphasis on the suitability of these to be defined by local context and the preservation of townscapes when viewed from both within and outside of the town centre. The proposed studies into the capacity of the Intensification Area will assist in understanding the role of tall buildings to meet development needs, and will help to clarify and define what a tall building might be in a Harrow context.
- G8. The Preferred Option supports the proposal to remove the London wide blanket requirement for 50% affordable housing. Reference is therefore made to Harrow's already agreed targets to 2011 and to the requirement for more family affordable provision (4 and 5+ bedrooms), as these are where need is most acute in Harrow. It also makes reference to the need to ensure family sized affordable housing gets the HCA funding required to ensure these are built.
- G9. On the matter of Gypsy and Traveller accommodation, the Preferred Option acknowledges the need to make provision and to actively engage the GLA and other west London authorities in this process to ensure any apportionment targets reflect the sub-region's and Harrow's own physical capacity to accommodate additional pitches.
- G10. The Preferred Option supports and seeks to give effect to the London Plan proposals to promote high quality urban environments. It includes, as a means by which to achieve the strategic policies, the preparation of development management policies aimed at controlling 'back garden' development; the protection of existing open spaces, and the imposition of higher building design and environmental standards. The latter addresses such matters as minimum internal space standards, Lifetime and Accessible Homes, and the greening of homes. The Preferred Option also seeks to give effect to the proposed elements of a revised London Plan that support efforts to safeguard and enhance Harrow's green, leafy character.
- G11. Having regard to the above, it is considered that the Preferred Option for Harrow responds appropriately to the emerging new London Plan and offers the best possible opportunity to demonstrate soundness through conformity with the regional spatial strategy for London.

H. How the Preferred Option responds to the comments received to earlier consultation

- H1. The Preferred Option responds to the comments received to earlier consultation by revisiting the vision and strategic objectives to make these more locally relevant and specific in terms of deliverability. It seeks to address the concerns to the scale of development proposed by both previous options within Harrow Town Centre by spreading this throughout a much larger Intensification Area and providing for significantly more development on existing strategic brownfield sites located throughout the Borough. This will ensure the positive benefits of development can be realised across more of Harrow's communities.
- H2. The additional ways in which the Preferred Option responds to the comments and concerns raised is that the Intensification Area:
- Ensures a sufficient level of development and growth is still to be directed to the central area providing the impetus to regenerate Wealdstone and rejuvenate Harrow town centre, ensuring it maintains its 'Metropolitan' status;
 - Makes the most of the significant capacity that exists within the area to accommodate a substantial portion of the Borough's future housing need through the delivery of higher density residential and mixed use development on key strategic sites and renewal areas;
 - Identifies the need for 'moderately' tall buildings in suitable locations and defines what a 'tall building' means in a Harrow context, including the need to preserve and improve existing townscapes and the setting of Harrow-on-the-Hill;
 - Will deliver significant employment growth through an uplift in retail, office and hotel development within the town centres and the intensification of industrial and other business use within the Wealdstone Industrial Area as well as other non-designated employment sites;
 - Makes sufficient provision for growth and development in waste management and green industries;
 - Creates communities within the Intensification Area with sufficient critical mass to drive commercial sector investment in shops, services and leisure, including a much improved night time economy;
 - Provides a much needed focus for regional and government agency engagement in 'place shaping' in Harrow;
 - Maximises planning obligations through improved development viability resulting in increased land values providing the ability to meet increased s106 contributions and ensuring development is matched by investment in physical and social infrastructure;
 - Takes a much more pragmatic and sophisticated approach to the provision of affordable housing, ensuring this is provided in the most suitable locations and targeted at meeting identified needs;

- Provides the ability to create discrete policies for the Intensification Area, in recognition of its growth role, to maximise sustainability outcomes and deliver real change in terms of the environmental improvements to be achieved, through requirements for higher environmental built standards (BREEAM Excellent, Code for Sustainable Homes Code 4 and above, SUDS, green roofs, energy efficiency) as well as provision for low carbon emission zones, community-wide CHP schemes, flood attenuation works, implementation of 'green grid' principles, and other off-site and more strategic mitigation measures.

H3. With regard to development outside of the Intensification Area, the promotion of development on strategic sites identified as part of the GLA Housing Capacity Study, responds to the comments and concerns raised in the following ways:

- Ensures development comes forward on sites throughout the borough, which will continue to provide a mix of housing types and tenure;
- Ensures traditional suburban areas are not compromised by the pressure for more intensive development or infill;
- Potential constraints to development of these strategic sites has already been the subject of assessment through the Strategic Housing Land Availability Assessment;
- Gives priority to the development of derelict or under-utilised brownfield sites within the existing built-up areas, providing for housing renewal or the potential for mixed use development;
- The majority of the strategic sites offer the potential to realise a significant uplift in land values, ensuring development can meet affordable housing and other policy requirements, including the need to contribute to the provision of local social and physical infrastructure;
- Prevents limitless infill and the loss of gardens and imposes control over residential conversions, ensuring these result in liveable homes that respect the amenity values and characteristic of surrounding suburban environment and appropriately address potential adverse impacts;
- Maintains the existing boundaries and strengthens the protection to be given to Green Belt, Metropolitan Open Land and open space designations in recognition of the social, amenity and environmental functions of these areas;
- Ensures development results in improved environment through renewal of poor quality and resource inefficient development;
- Ensures residential development makes appropriate provision for on-site private open space and areas of play;
- Makes provision for a range of housing, including family sized affordable housing to meet existing acute needs.

H4. In addition to refining the preferred option for growth, further changes have also been made to the Core Strategy vision, objectives and policies to further emphasise the Council's commitment and priority to tackling climate change, worklessness, promoting sustainable development and addressing the spatial aspects of the Sustainable Community Strategy.

I. Next Steps

- I1. Public consultation on the Core Strategy Preferred Option document and accompanying Sustainability Appraisal will be carried out for a period of six weeks, in accordance with the Council's Statement of Community Involvement, starting at the beginning of November. The consultation is important as it provides the public and stakeholders with the opportunity to be further informed of our preferred option and allows them to highlight any issues relating to policy coverage; the form, content and wording of the vision, objectives and policies; and to identify potential issues regarding the tests of soundness.
- I2. The results of this consultation will be assessed and the draft Core Strategy will be revised in light of the comments received. Both the assessment of representations and the revised draft Core Strategy will be reported back to Cabinet in February/March 2010. There will, at that time, be a need to undertake further appraisal of any proposed changes to the Core Strategy and to prepare a new Proposals Map. Once Cabinet is satisfied that the revised draft meets the Government's tests of soundness, full Council will be requested to endorse it for pre-submission publication, followed by submission to the Secretary of State in March 2010 and Examination in Public in late 2010.

J. Local Development Scheme

- J1. The adopted Local Development Scheme (LDS) will need to be amended to reflect the fact that, following the advice of the Planning Inspectorate and for the reasons set in paragraph B4 of this report, the Council has prepared and is consulting on a further Preferred Option. The LDS amendments will need to include the implications of this further stage of consultation on the timetable for later stages of the Core Strategy's preparation.
- J2. A further issue raised by the Planning Inspectorate, at the front-loading visit, was the question around how the Council intends to deliver the Intensification Area. The designation of Harrow's growth area as an Intensification Area within the draft London Plan has significant benefits (as described in this report). Reflecting the concerns raised by respondents, the designation of an Intensification Area also has implications for delivery that are likely to require greater joint working between the Council and other delivery or support agencies. With respect to the policy framework, it is considered that an Area Action Plan would be the most appropriate framework for achieving this, allowing for joint authorship as well as a more structured, statutory process.
- J3. It is therefore recommended that, to reinforce the Council's commitment to delivery of the Intensification Area, the Local Development Scheme should be revised to bring forward preparation of a Harrow and Wealdstone Intensification Area Action Plan. This would be a joint plan prepared by the Council and our key delivery partners, in consultation with the development industry and the wider community. It would be programmed for preparation alongside the existing programme for the Site Specific Allocations and Development Management Policies DPDs.

- J4. The introduction of an Area Action Plan also offers the opportunity to consider replacing the flagship actions to prepare a Harrow Town Centre Design Brief SPD and a Wealdstone Development Brief, with a Intensification Area Design Principles SPD that would give further effect to the policies of the Area Action Plan and would apply to the entire area.
- J5. Further amendments to the LDS are also recommended to take account of changes to the timetable for preparation of the Joint West London Waste Plan.

K. Implications of the Recommendation

Resources and Costs

- K1. Staff time and resources to undertake consultation on the Preferred Option document will be met from existing budgets. The further resource and cost implications of progressing the Core Strategy and other LDF documents is outline in Section L of this report.

Equalities Impact Assessment

- K2. The consideration of the needs and priorities of different sections of the community are an integral and ongoing part of the process of preparing the component parts of the statutory development plan. This includes requirements under the Planning and Compulsory Purchase Act (as revised) to undertake Sustainability Appraisal informing each stage of a document's production. In addition, consultation on the preparation of the plan has been undertaken in accordance with the Council's Statement of Community Involvement, which seeks to involve the wider community and, in particular, the engagement of 'hard to reach' groups, in the plan-making process.

Legal comments

- K3. The legal comments are contained within the report.

Community safety

- K4. Consultation with key statutory agencies in the preparation and delivery of the Core Strategy and related documents is ongoing. Such engagement ensures the land use and services needs of these sectors are incorporated in development plan policy and reflected in co-ordinated delivery programmes. No explicit issues arise as a result of this report or its recommendations.

L. Financial Implications

- L1. The cost of preparing the Core Strategy and the LDF is significant and is spread over a number of years. The financial consequences arising directly from this report i.e. staff time and resources to undertake consultation on the Preferred Option document will be met from existing budgets. The cost of progressing the Core Strategy through to adoption will require further funding and resources beyond this financial year, part of which will be met from Housing and Planning Delivery Grant, although it should be noted that there is a degree of uncertainty as to future years' levels to be derived from this funding stream. Sufficient funding for staff resources and costs associated with preparing the LDF during 2010/11 will need to be contained within the departmental budget provision and reflect the Council's priority to putting in place an adopted Core Strategy and other components of the LDF. Should such funding not be made available, it will be necessary to prioritize delivery of key LDF documents and/or revise the timetable for preparing various elements of the LDF.

- L2. The Committee is requested to note that the adoption of the Core Strategy and the LDF will have implications for the long-term delivery of services and infrastructure by the public and private sector. These implications, reflecting the spatial strategy, will require alignment of existing and future resources to deliver the Strategy. Specific commitments, where required, their timing and costs, along with those of our delivery partners, will be set out in the Infrastructure Delivery Plan. Future development will be required to make appropriate contributions towards meeting infrastructure and service requirements in line with Government expectations through Planning Obligations or a Community Infrastructure Levy in latter years.

M. Environmental Impact

- M1. No issues arise as a result of this report or its recommendations. However the Core Strategy plays a central part in meeting the Councils commitments to addressing climate change. These will be reflected in the Core Strategy and associated LDF documents that will undergo a sustainability appraisal, which includes the requirement for Strategic Environmental Assessment. It is anticipated that this will identify in detail any potentially negative impacts or risks and outline how these will be mitigated and any potentially positive impacts maximised.

N. Risk Management Implications

- N1. A significant number of Core Strategies have been found 'unsound' and many more withdrawn post submission to the Secretary of State to address potential issues regarding compliance with process, weaknesses in the evidence base or failings in the content, form or function of the document itself, such as a lack of locally distinctive objectives and policies, concerns regarding deliverability, and the spatial strategy failing to reflect the objectives and land use requirements of other strategic strategies. In London, so far only two boroughs have achieved sound Core Strategies. However, the changes introduced to PPS12 in June 2008 aim to address some of the key issues that have arisen. In addition, the preparation of the Harrow's Core Strategy Preferred Option and evidence base has drawn on the experience of other councils, good practice and the advice of the Planning Inspectorate, Government Office for London, the Planning Advisory Service.

Section 3 - Statutory Officer Clearance

Name: Narinderpal Heer	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date:8 October 2009		
Name: Jessica Farmer	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date:7 October 2009		

Section 4 - Contact Details and Background Papers

Contact:

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

Background Papers:

Planning and Compulsory Purchase Act 2004

Town and Country Planning (Local Development) (England) (Amendment)
Regulations 2008

Planning Policy Statement 12 – Creating Strong Safe and Prosperous
Communities Through Local Spatial Planning, CLG June 2008

Plan-Making Manual, CLG/Planning Advisory Service June 2008

Planning Inspector Roy Foster's Note on the Harrow Front-loading Visit, 23rd
July 2009

Harrow LDF Core Strategy Draft Preferred Options – Public Consultation, 6
June 2008

Consultation Report detailing responses received to the Core Strategy Draft
Preferred Options – Public Consultation document, LBH, October 2008

Sustainability Appraisal of the Preferred Option, LBH, October 2009

Harrow Statement of Community Involvement, LBH, August 2006

A New Plan for London Plan – Proposals for the Mayor's London Plan, GLA,
April 2009

Updated Employment Land Review, NLP September 2009

Updated Retail Study, NPL September 2009