

**REPORT FOR: OVERVIEW AND
SCRUTINY COMMITTEE
AND SCRUTINY SUB-
COMMITTEES**

Date of Meeting:	27 January 2011
Subject:	Core Strategy – Proposed Submission Version
Responsible Officer:	Andrew Trehern – Corporate Director of Place Shaping
Scrutiny Lead Member area:	Keith Ferry – Portfolio Holder for Planning, Development and Enterprise
Exempt:	No
Enclosures:	Proposed Harrow Core Strategy Submission Document

Section 1 – Summary and Recommendations

This report introduces the submission publication version of the Harrow Core Strategy, which is intended to be published for public consultation in March 2011, prior to its submission to the Secretary of State in May 2011.

Recommendations:

The Committee is requested to consider and comment on the submission version of the Core Strategy which is to be reported to Cabinet at its meeting of 10th February 2011.

Section 2 – Report

Introduction

1. In accordance with its recently revised programme, the Council is preparing 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 LDF will set out the Council's planning strategy and policies to guide the quantity, quality and location of new development in Harrow to 2026.
2. The Core Strategy is the key strategic level document within the LDF. Following the consideration by the LDF Panel of the responses made to consultation on the Council's 'preferred option' in January 2010, the Core Strategy has been revised in line with the LDF Panel Report of 7 September 2010. The revised Core Strategy is now ready for the next statutory stages in its preparation and progress to adoption - pre-submission consultation and formal submission to the Secretary of State (Regulations 27 & 30 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended)).

Purpose of the Core Strategy

3. The purpose of the Core Strategy is to set out the broad strategy and vision for the borough over the next fifteen years. It identifies the areas where development and growth will be promoted and specifies the quantum and types of development and land uses needed to deliver the vision for the area. 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 Area Action Plan, all of which are currently being prepared for their initial round of public consultation in April 2011.
4. The Core Strategy has been developed over a number of years in consultation with the community and stakeholders, having regard also to the key issues affecting the Borough, the findings of evidence based studies, and the requirements of national and regional planning policies. Given its strategic nature, the Core Strategy is also a principal means by which to give effect to the Council's 'place shaping' role, helping to deliver the priorities set out in the Sustainable Community Strategy and the Council's other strategies and those of our public sector partners.
5. Recent published proposals in the draft Decentralisation and Localism Bill, whilst promoting the concept of neighbourhood plans, also serve to confirm the important role that the Core Strategy has in providing a borough-side strategic plan.

Background

6. Preparation of the Core Strategy has involved a number of stages beginning with consultation on the key 'issues and options' in 2006. In 2007 consultation was undertaken on four strategic options for the future development of Harrow. These were then revised down to two strategic options, which were consulted on in 2008 before being further refined to form the Council's 'preferred option', which was considered and endorsed by this Committee at its meeting of 12 October 2009 and was the subject of further public consultation from 12 November 2009 to 11 January 2010.

7. The results of consultation to the Preferred Option document were reported to the LDF Panel at its meeting of 11 March 2010. The key findings showed that:

- 73% of all respondents supported the revised spatial vision, although more detail was requested about the development and change that will happen to locations outside of the Intensification Area;
- 77% of all respondents supported the principle of a Harrow and Wealdstone Intensification Area but that such support was often conditional on demonstrating that the potential impacts of development could be managed. Those opposed cite the need for a more balanced approach to growth across the Borough;
- Majority support given to all eight strategic objectives with suggestions provided as to how these could be further improved, strengthen and better linked to implementation and delivery through the strategic policies;
- 63% in agreement to the overall approach to managing Harrow's growth. Where concerns were raised, these were again in respect of ability to manage the impacts of growth and deliver upon the strategic objectives, and to the principle of concentrating development within an intensification area;
- Support for the housing policy was mixed, with some questioning the need for further growth and the capacity of sites/areas to accommodate more homes at the levels proposed. Others wanted clarity around the different housing targets, the housing mix to be provided and the scope for flexibility;
- There was strong support for economic growth within business and retail sectors, but with caveats that these policies must be realistic with regard to the Harrow market and therefore greater flexibility would be needed to respond to changing circumstances. It was also felt that more focus was required on maintaining and enhancing the vitality and viability of district and local centres;
- With regard to transport, respondents recognised and supported the continued principle of achieving higher densities where public transport accessibility enables this but specified the need for continued investment in Harrow's transport infrastructure. Parking and how this is to be managed was also raised as a significant issue.

Key changes made

8. At its meeting of 7 September, the LDF Panel considered a detailed schedule of proposed responses to comments made to the 'preferred option'

document and how these would inform changes to the submission version of the Core Strategy. The LDF Panel endorsed the recommendation to alter the structure of the document by moving away from thematic based policies (i.e. policies that deal with a specific land use issue such as housing, transport, retail, open spaces etc) in preference to area based policies (i.e. policies specific to a place within the borough). The benefits of this change are:

- That the strategic objectives sought can be specific about the land use issues affecting an area;
- The policies can better reflect the strategic objectives for an area, making them more meaningful; and
- The means of delivery, and monitoring measures to be used, are relevant to the place and the achievement of the strategic objectives.

9. This change addresses the general criticism of the 'preferred option' document, that its policies focused too heavily on the Intensification Area and did not adequately address how areas outside of the Intensification Area would be developed. It also enables the vision for the borough to be altered to give a broader future vision for the borough as a whole.

10. In terms of providing more detail, officers have been compiling and completing the necessary evidence base studies required to more comprehensively respond to the concerns raised. The evidence base studies completed over the past year include the strategic housing market assessment; the development viability study; the employment land review; transport audit; the open spaces assessment; characterisation study; and the infrastructure assessment. The findings of these studies have been used in the submission version to confirm at the strategic level of this document:

- That sufficient capacity does exist to accommodate the distribution and levels of growth proposed and, in particular, 2,500 homes and 3,000 jobs within the Intensification Area;
- The type and mix of development required to meet local identified needs for housing (in terms of both tenure and size) and employment (in terms of retail, office and industry);
- That the resulting distribution and form of growth outlined is deliverable in the context of the spatial strategy;
- That development can support the delivery of affordable housing and other requirements including social and physical infrastructure; and
- The level and types of social and physical infrastructure needed to support new development.

11. Given that the 'preferred option' was generally well received, the submission version does not seek to alter the overall approach in terms of the quantum's and distribution of development proposed. Rather the submission version seeks to build on this by being more specific about how the different places within the borough will grow and develop and provides more detail, where necessary, to demonstrate how the kinds of development proposed will be delivered and how any potential impacts will be managed.

Further editorial requirements

12. Members should note that due to the timeframes involved in the Council reporting procedures that, at the time of publishing this report, the version of the Core Strategy was and will still very much be, a work in progress, and subject to further internal consultation and rigorous editing. Whilst the structure and outcomes, in terms of housing numbers, jobs etc, will not change, final drafting of the document is still under development having regard to recent and emerging announcements from Government. The document is also to be published using the Limehouse Software System, which will enable interactive consultation. It will therefore require further formatting work using this software, particularly in relation to the insertion of images.

Next Steps

13. The proposed submission version of the Core Strategy - attached at Appendix 1 - will be considered by Cabinet on 10th February and by Council on 17th February. Subject to Council approval the Core Strategy will be published for pre-submission public consultation in accordance with Regulation 27 of the Town and Country Planning Regulations 2008, and the Council's Statement of Community Involvement (2007), for a six week period in March.

14. Copies of all responses received during pre-submission publication will then be forwarded to the Planning Inspectorate for consideration alongside the Submission Core Strategy, together with a Summary of Key Issues setting out the council's response to points raised. In contrast to previous stages of consultation, the Council will not be making any further substantial changes to the Core Strategy prior to submitting the Plan. However, a Schedule of Minor Post-Publication Changes (editing) will be prepared and submitted to the Planning Inspectorate.

Equalities Impact

15. An equalities impact assessment has been undertaken of the submission version of the Core Strategy. This builds on the previous EQIA's prepared for all previous formal stages of the Core Strategy's production. This confirms that the proposed policies of the Core Strategy will have a positive impact on target groups.

Legal Comments

16. The Core Strategy is the key Development Plan Document (DPD) in the Council's Local Development Framework which will provide the overall spatial vision and objectives for the Borough.

17. The legal requirements for the preparation, consultation and submission of the Core Strategy to the Secretary of State are prescribed by the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). A failure to comply with the statutory requirements may result in the Core

Strategy being found “unsound” by an Inspector at the independent examination.

Financial Implications

18. The cost of preparing, publishing, consulting and submitting the Core Strategy is contained within the existing LDF budget. The cost of examination of this document is incorporated in the LDF team budget for 2011/12.

Performance Issues

19. A key piece of LDF evidence base is the Annual Monitoring Report, which highlights the performance of existing UDP policies against a set of national and local indicators. The findings of the latest AMR have been used to inform the proposed policies of the Core Strategy, which seek to address areas of weak performance and to build on those areas where the borough has performed well. The following table summarises relevant planning performance indicators:

Which performance indicators will be impacted by the proposal?	What is the current performance of those indicators?			Potential impact of the policies of the Core Strategy
	Target 09/10	Actual 09/10	Target 10/11	
NI154 Net additional homes provided	400	460	400	Makes provision for a 15-year housing supply in accordance with government guidance PPS3 that meets the existing and new London Plan strategic housing requirement for Harrow.
NI155 Number of affordable homes delivered (gross)	165	143	165	Seeks to secure the maximum affordable housing provision from individual sites of 10 and above units.
NI157 Processing of Planning applications as measured against targets for ‘major’, ‘minor’ and ‘other’ application types	69%	84%	69%	Sets the framework for later LDF documents including that for Development Management. An update development management plan will assist greatly in certainty to developers and help Council to determine future planning applications in accordance with statutory timeframes.

NI159 Supply of ready to develop housing sites	100%	100%	100%	Makes provision for a 15-year housing supply in accordance with government guidance PPS3 that meets the existing and new London Plan strategic housing requirement for Harrow.
NI170 Previously developed land that has been vacant or derelict for more than 5 years	No specific data set	5.7 ha	No specific data set	Identifies and encourages development of Brownfield sites where these have been vacant or derelict for a period of 6 months or more.
NI171 VAT Registration rate	No specific data set	88.4%	No specific data set	Seeks to retain and support existing and new businesses and in particular small to medium size enterprises through provision of start-up units.
NI186 Per capita reduction in CO2 emissions in the LA area	7.5%	4%	7.5%	Seeks to reduce CO2 emissions through locating housing in areas of high public accessibility and through requirements for higher sustainable building design standards.
NI188 Adapting to climate change	Level 1	No data	Level 1	Seeks to address the impacts of climate change through provision for sustainable building design and appropriate strategic mitigation through provision for CHP schemes as well as flood mitigation measures.
NI189 Flood and coastal erosion risk management	100%	100%	100%	The SRFA was completed in July 2009 and has taken into account in preparing the Strategy and the future distribution of housing
NI191 Residual household waste per head	230	240.82	225	Focuses on ensuring development manages waste towards the higher end of the waste hierarchy.
NI192 Household waste recycled and composted	40%	46%	42%	Focuses on ensuring development manages waste towards the higher end of the waste hierarchy.
NI197 Improved local biodiversity – active management of local sites	4	4	3	Addresses the functionality of open space and the ability to create continuous green chain links. It also gives statutory protection to sites of conservation
What is the current performance of these indicators?	The above table shows current year and targets for 10/11. It is expected that the Core Strategy brings forward pro-active strategic policies to provide the capacity and delivery means by which to meet these targets.			

How much will current performance be improved or other negative effects be mitigated?	The adoption of the final Core Strategy will ensure the council has delivered upon these major performance strands and complies with the Place Shaping agenda.
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20. The Government has announced its intention to withdraw National Indicators as from 1 April 2011 but to substitute a list of data requirements. Many of the datasets underlying the above indicators will still be required and the Council is in the process of reviewing the performance measures it needs to manage its business.

Environmental Impact

Does the proposal comply with all relevant environmental legislation? Yes

21. The consideration of environmental impacts is an integral and ongoing part of the process of preparing the Core Strategy. This includes requirements under the Planning and Compulsory Purchase Act (as revised) to undertake Sustainability Appraisal, incorporating Strategic Environmental Assessment, informing each stage of a document's production. In preference to repeating the assessment and findings of the Sustainability Appraisal, a copy of the Report is available electronically. It should be noted that the Sustainability Appraisal will also be published alongside publication of the Core Strategy.

Risk Management Implications

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	The Examination in Public will be held to test the soundness of the Core Strategy. Under the Planning and Compulsory Purchase Act an Inspector is charged with first checking that the plan has complied with legislation.	Despite changes to the Planning Regulations since they were enacted in 2004, officers have sought to ensure compliance with the relevant legislation and have maintained a log that chronicles such compliance.
Producing a 'sound' document	To be 'sound' a Core Strategy should be justified (i.e. founded on a robust and credible evidence base & the most appropriate strategy when considered against reasonable alternatives) and effective (i.e. deliverable, flexible and able to be monitored).	Extensive public consultation has been undertaken on a range of strategic development options during the Core Strategy's development in accordance with the adopted SCI. Significant work has been undertaken over the past year to ensure the Core Strategy is supported by a robust evidence base and that the policies developed

		are realistic and deliverable.
Consistent with national policy	Unless there is robust local evidence to support a variation, the policies of the Core Strategy need to be consistent with those set out in national planning policy (i.e. Planning Policy Statements (PPS) and Planning Policy Guidance (PPG)). The coalition Government has signaled its intention to replace the current set of PPS's and PPG's with a more simplified and streamlined set of policy statements. However, to date only minor amendments to existing PPS have been made	New national policy statements will need to be subject to a period of public consultation. Any proposed changes to national policy will be reported to the LDF Panel for its consideration. Where changes to existing PPS are made with immediate effect, the recommendations to Cabinet seek delegated authority to make the necessary amendments to the submission version of the Core Strategy to take account of such changes.
'General conformity' with the London Plan	The Core Strategy has to be in general conformity with the London Plan.	Officers will continue to work with colleagues in the GLA over the policy position to be reflected in the Core Strategy prior to the replacement London Plan being adopted.

Corporate Priorities

The Core Strategy will help to deliver the current corporate priority:

- **Build stronger communities:** Engagement with the community and others is at the heart of the LDF process. The submission version of the Core Strategy sets out how the Council is responding to the community's concerns and how it seeks to ensure that the development and growth within the borough reflects the priorities and preferences of residents.

And the emerging Corporate priorities:

- **Keeping neighbourhoods clean, green and safe:** by protecting and enhancing our open spaces; and
- **A Town Centre to be proud of:** changing Harrow for the better; by providing the policy framework to manage change and maximise the benefits of new development and growth, including securing retail growth, office renewal and improvements to the environment and infrastructure of Harrow Town Centre.

Section 3 - Statutory Officer Clearance

Name: Kanta Hirani	<input checked="" type="checkbox"/>	on behalf of the* Chief Financial Officer
Date: 12 January 2011		
Name: Abiodun Kolawole	<input checked="" type="checkbox"/>	on behalf of the* Monitoring Officer
Date: 11 th January 2011		

Section 4 - Contact Details and Background Papers

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

Background Papers:

Core Strategy Preferred Option (November 2009)
LDF Panel Information Report (11th March 2010): Schedule of Detailed Consultation Comments and Council's Initial Considerations
LDF Panel Information Report (7th September 2010): Council's Proposed Response to Consultation Comments
LDF Evidence Base Studies

NB: All of the above background papers are available via the Council's website