

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

Date of Meeting:	05 April 2011
Subject:	Draft Issues and Options Consultation Documents for the Harrow & Wealdstone Area Action Plan; Draft Site Allocations DPD; and Draft Development Management Policies DPD
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:	Due to the size of the three draft DPDs, electronic copies of each have been circulated to Committee Members and Reserves only. The three draft DPDs will be published with the agenda and can be viewed on the website.

Section 1 – Summary and Recommendations

This report introduces three Development Plan Documents (DPDs) that are being prepared in support of the spatial strategy set out in the Core Strategy. When adopted the DPDs will form part of Harrow's Local Development

Framework.

Recommendations:

The Committee is requested to consider and comment on the draft issue and options consultation documents for the Harrow and Wealdstone Area Action Plan, the draft Site Allocations DPD, and the draft Development Management DPD, which are to be reported to Cabinet at its meeting of 7th April 2011.

Section 2 – Report

Introduction

1. 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). Now that the Core Strategy has progressed to the submission stage, work has begun on preparing the other development plan documents of the Harrow LDF that will give effect to and support the implementation of the vision, objectives and spatial strategy of the Core Strategy.

2. This report provides a brief summary of purpose and content for each of the draft DPDs. The documents were also reported and considered by the LDF Panel at its meeting of 15 March. At the time of writing this report the minutes of that meeting were not available but the responsible officer will be able to give a verbal update to this Committee of the matters raised. Subject to Cabinet and Council approval, the three draft documents will be published in May 2011 for a six week period of public consultation in accordance with Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended).

Summary of the purpose and content of each DPD

Harrow and Wealdstone Area Action Plan

3. The Harrow and Wealdstone Area Action Plan (AAP) is being prepared jointly with Greater London Authority (GLA). Its purpose is to give effect to the Intensification Area designation of both the Core Strategy and Replacement London Plan by setting out the policies, proposals and site allocations required to manage growth and development in the Intensification Area in a comprehensive manner, ensuring it delivers the social, environmental and economic outcomes sought for the area. These include:

- The creation of 3,000 new full time equivalent jobs;
- Higher density and higher quality residential and mixed use development providing 2,500 new homes;
- Strengthening the role of Harrow town centre as a prosperous Metropolitan centre within outer London;
- Regenerating Wealdstone district centre, ensuring that new employment led redevelopment of the surrounding industrial estates, including the Kodak site, contribute to its long-term growth and vitality;

- Creating a clear context for development on the Kodak site;
- Improving the amenity and connectivity of Station Road;
- Increasing the Borough's 'visibility' in a west London and London context to ensure Harrow secures appropriate levels of investment from private and public sector partners;
- Ensuring new development and growth is matched by investment in infrastructure serving the area and the wider Borough.

4. The Issues and Options Consultation document draws on the work and consultation undertaken to date on behalf of the Council and the GLA by East Architects, who have been commissioned to prepare a masterplan for the area. It outlines four development strategy options, including a preferred option, for how growth and development might be accommodated within the Intensification Area. The options have been developed by East Architects based on a baseline analysis, a review of policy and the evidence base, and through the consideration of issues, concerns and opportunities raised through consultation with forum groups. A summary of the four development strategy options are set out below, along with a brief commentary of their respective strengths and weaknesses:

Option 1: One Centre – This option would see the three sub-areas (Harrow town centre, Wealdstone town centre and Station Road) being joined together by a shared intensification of activity, reducing any distinctions between the areas and, over time, see them developed as one large centre. This is a highly ambitious option that requires the maximization of the capacity of all strategic sites within the Intensification Area with development types (housing and employment) and densities being applied equally across the whole area. As a result, this option offers the highest overall outcomes in terms of levels of residential development and job outputs but this is likely to be at the cost of local context. This option may also not be compatible with existing levels of public transport accessibility and there is a risk that the market might not be able to absorb this level of development.

Option 2: Harrow + – In this option, intensification and development would be focused on Harrow town centre. It would ensure the centre's Metropolitan status was enhanced and retained, and would see significant public realm and infrastructure improvements delivered in the centre that would benefit the wider community. However, it would require most housing to be met in tall, flatted schemes, which presents risks in terms of market saturation as well as opposition from residents to see this form of development within the town centre. The option would only result in modest growth and benefits for Station Road and Wealdstone, and therefore does not optimize the regeneration opportunities that exist within these sub-areas.

Option 3: Two Centres – This option would retain and reinforce the distinctiveness of Harrow town centre and Wealdstone, ensuring new development is sensitive to these areas. Growth would be focused within the two town centres, with flatted housing development in Harrow town centre (but at a much reduced scale than required under option 2) and the provision of family orientated housing in Wealdstone. The regeneration of Wealdstone will also benefit from housing and employment development of the Kodak site. Station Road does not play a significant role under this option, and therefore

the opportunity to strengthen its role as a link between the two town centres and to regenerate Station Road will be missed.

Option 4: High Roads and Centres – This option is similar to option 3, but with the additional benefit of realizing the development opportunities that exist along Station Road, which would facilitate much needed public realm improvements along this corridor. However, this option would require appropriate controls and more detailed guidance to be put in place to ensure the three sub-areas retained their distinctiveness, in terms of function and built form, and did not morph into one homogenous entity as proposed by Option 1.

Development Management Policies DPD

5. The purpose of the Development Management Policies DPD is to give effect to the Harrow Core Strategy by setting out the detailed planning policies required to control the development and use of land and ensure the agreed Spatial Strategy is delivered. The Development Management Policies DPD therefore seeks to establish the specific standards and policy criteria that new development will be expected to meet, and against which planning applications will be considered.

6. The policies of the Development Management Policies DPD will apply to all new development proposed within the Borough that is **outside** of the Harrow Intensification Area boundary.

7. With regard to content and policy coverage, there is no need for the Development Management Policies to replicate policies contained in national policy statements or the London Plan, as the latter already forms part of the Development Plan for the Borough and the former is a material consideration. Rather the purpose of the Development Management Policies DPD is to provide detailed policies at a local level that reflect the spatial strategy and strategic objectives of the Harrow Core Strategy. The exception to this is where it is necessary to give further local interpretation to regional and national policy, which may include providing a 'policy hook' to enable the Council to bring forward Supplementary Planning Documents, Planning Briefs or Design Guidance to give clarity to local circumstances and to assist all parties in the design rationale of schemes and the acceptability of proposals.

Site Allocations DPD

8. The purpose of the Site Allocations DPD is to identify spatial policy designations and to safeguard or allocate sites, **outside** of the Harrow Intensification Area, in line with the spatial objectives set out in the Core Strategy and the emerging Development Management Policies DPD. It will identify the locations and sites for specific types of development, such as housing and employment, or sites to be protected through planning policies, including retail frontages and open spaces, in order to ensure the vision, objectives and spatial development strategy of the Core Strategy are given effect and implemented. It will also sets out further detail of the policy context and criteria applying to specific sites proposed for development, alongside site constraints, relevant strategic objectives to be met, identified local needs and specific infrastructure requirements.

9. The content of the draft Site Allocations Document has been informed and shaped by the following work:

- The 'Call for Sites' carried out in 2009, and again in late 2010, which has been used to update our evidence of available land (Strategic Housing Land Availability Assessment) and to gain an understanding of landowner aspirations;
- Other research work including the recent Employment Land Study, Retail Study, Strategic Flood Risk Assessment, Viability Assessment, PPG 17 Study and work in support of the Draft Joint Waste Management DPD;
- Representations received to consultation on the Harrow Core Strategy;
- Consultation undertaken with service providers;
- Issues raised by colleagues in Development Management with respect to the applicability, validity or errors identified with existing allocations;
- Representations received by external parties regarding inconsistencies or corrections required to the proposals map forming part of the Harrow UDP;
- A review of sites with planning permission within the Borough;
- Analysis of changes to national and regional policy which impacts on existing and proposed allocations or definitions of development, which will need to be picked up through the Site Allocations Document.

10. A number of the sites identified in this DPD benefit from planning permission and the allocation is therefore based upon earlier planning decisions. Many of the allocated sites are therefore already known to the planning committee and the community. Based upon submissions received and research undertaken by officers, where the draft DPD identifies sites for development, it is considered that the sites and buildings included in the DPD will be made available and are deliverable within the plan period to 2026. Publishing the DPD for public consultation seeks to confirm these assumptions. Finally, in one or two cases, the document is being used to correct earlier drafting errors in the proposals map to the UDP, which have come to light during the intervening plan period.

The purpose of the Issues and Options stage consultation

11. The purpose of the Issues and Options stage is to invite public and stakeholder views and comments on the options or sites being put forward for consideration, to enable consultees to offer up further information, and to confirm the preferred option as the most appropriate option on which to prepare the final documents. To assist consultees, a Sustainability Appraisal (SA) has also been undertaken of the three DPDs, the purpose of which is to identify the potential positive and negative social, economic and environmental impacts likely to arise as a result of implementing the various development options proposed. The SA is to be published alongside the Issues and Options documents, to assist people in making an informed decision about which option they might prefer.

Next Steps

12. Subject to comments from the Cabinet and the approval of the Full Council, the three DPDs will be published for public consultation in accordance with Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004, and the Council's Statement of Community Involvement (2007), for a six week period in April/May 2011.

13. Following the close of consultation, the analysis of comments made to each of the DPDs and the Council's responses to these will be reported to the LDF Panel prior to further work being undertaken to progress each of the DPDs to the next stage.

Equalities Impact

14. An equalities impact assessment will be undertaken of the three DPDs. This will build on the previous EQIA prepared for the Core Strategy and will be made available to view on the Council website at the time the documents are published for public consultation.

Legal Comments

15. The legal requirements for the preparation and consultation exercise on DPDs are set out in 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 DPD being found 'unsound' at the examination in public.

Financial Implications

16. The cost of preparing, publishing, and consulting on the three draft DPDs is contained within the existing LDF budget. The purpose of preparing the three documents in tandem is to save costs, in terms of publication, notification and examination costs, and to make the most efficient and effective use of resources, in terms of officer time spent undertaking consultation and community engagement.

Performance Issues

17. A key piece of LDF evidence base is the Annual Monitoring Report, which highlights the performance of existing UDP policies against the set of national and local indicators. The findings of the latest AMR have been used to inform the Sustainability Appraisal of the three DPDs, which seek to ensure the DPDs, where relevant, address areas of weak performance and to build on those areas where the Borough is performing well. The following table summarises the most relevant planning performance indicators and how each document will respond to these targets:

Which performance indicators will be impacted by the DPDs?	What is the current performance of those indicators?			Potential impact of the DPDs
	Target 09/10	Actual 09/10	Target 10/11	
NI154 Net additional homes provided	400	460	400	The Site Allocations DPD and the AAP will identify and designate sufficient sites for new housing to meet Harrow's strategic housing requirement
NI155 Number of affordable homes delivered (gross)	165	143	165	The Development Management Policies and the AAP will 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%	An update development management plan will assist greatly in providing certainty to developers and help the Council to determine future planning applications in accordance with the statutory timeframes.
NI159 Supply of ready to develop housing sites	100%	100%	100%	The Site Allocations DPD and the AAP will identify and designate sufficient sites for new housing to meet Harrow's strategic housing requirement
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	All three documents seek to reinforce the spatial strategy of the Core Strategy which encourages development of sites and buildings that have been vacant or derelict for a significant period of time.
NI171 VAT Registration rate	No specific data set	88.4%	No specific data set	All three DPDs seeks to retain and support existing and new businesses either through allocating or safeguarding sites or buildings for employment use.
NI186 Per capita reduction in CO2 emissions in the LA area	7.5%	4%	7.5%	The AAP and Site Allocations DPDs will ensure new housing is located in areas of high public accessibility and through requirements in the Development Management Policies for higher sustainable building design standards.

NI188 Adapting to climate change	Level 1	No data	Level 1	The Development Management Policies and the AAP seek to address the impacts of climate change through requirements for sustainable building design, while the Site Allocations DPD ensures sensitive development not located in areas subject to flood risk.
NI189 Flood and coastal erosion risk management	100%	100%	100%	The SRFA was completed in July 2009 and has been taken into account in preparing the three DPDs
NI197 Improved local biodiversity – active management of local sites	4	4	3	All three DPDs address the functionality of open space and the ability to create continuous green chain links. They also give statutory protection to sites of conservation
NI204 Planning Appeal Performance	40%	37%	40%	The updated AAP and DM policies will serve to improve the Councils resilience in supporting planning decisions on appeal
BV200b Meeting the LDS Timetable	No specific data set	All milestone being met	No specific data set	The preparation of the three DPDs is in accordance with the timetable in the revised LDS
What is the current performance of these indicators?	The above table shows current year and targets for 10/11. It is expected that the DPDs propose allocations and policies to provide the capacity and delivery means that will enable delivery against these indicators in future years.			
How much will current performance be improved or other negative effects be mitigated?	The eventual adoption of the DPDs will ensure the Council delivers upon these performance indicators in a positive and proactive manner.			

18. 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. Forward targets for those indicators retained by the Council will take into account the intended effects of these policies.

Environmental Impact

Does the proposal comply with all relevant environmental legislation? Yes

19. The consideration of environmental impacts is an integral and ongoing part of the process of preparing all Development Plan Documents. 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 Sustainability Appraisal is available electronically and will also be published alongside publication of the three DPDs.

Risk Management Implications

Risk included on Directorate risk register? Yes

Separate risk register in place? Yes

Potential Risks	Commentary	Mitigation Measures
Compliance with legislation	To meet the test of 'soundness' of DPDs are required to comply with the legal requirements for preparing and consulting on DPDs under the Planning and Compulsory Purchase Act.	Officers will seek to ensure compliance with the relevant legislative requirements, including the undertaking of Sustainability Appraisal, Equalities Impact Assessment and requirements for consultation. The LDF team will maintain a log that chronicles legal compliance of the DPDs as they progress towards examination and adoption.
Reform of the plan-making system	The Government has signaled its intention to reform the planning system and, in particular, to issue a single national policy statement that Development Plan Documents will need to be consistent with.	Any changes to the current planning system, including the introduction of a single national policy statement, will need to be subject to a period of public consultation. The three DPDs are at a very early stage of production, which should enable changes in legislation or national policy to be reflected in latter stages if necessary. Officers will keep abreast of proposals and consultation on changes to the planning legislation and national planning policy, and will report these and the potential implications for Harrow's LDF to the LDF Panel.
Inappropriate consultation responses	A real risk with consultation on the DPDs is that consultees will make representations in respect of matters that have already been dealt with through the Core Strategy and are therefore not up for further debate.	The DPDs will be clear that their purpose is to give effect to the Core Strategy, including the agreed spatial strategy, which includes the broad distribution and quantum of development to be accommodated, as well as the strategic objectives regarding the safeguarding of specific types of land use, including employment and open space.
Resourcing	The three DPDs are being prepared and published in tandem. There is a risk that at	Officers will monitor the workload in respect of the three DPDs being prepared and will seek to manage peaks or crunch points in the process.

	<p>key stages in the plan making process, resources in the LDF team may not be sufficient to maintain the timetable agreed in the revised LDS.</p>	<p>However, the workload associated with any one DPD is dependant on the level of community interest, number of responses received to consultation and the complexity of the matters raised. Where necessary, additional staff resources may need to be drafted in for short periods. This will be done in consultation with the Director of Planning and seek to give opportunities to those within the department who may wish to gain policy experience.</p>
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Corporate Priorities

20. The three DPDs will help to deliver the following emerging corporate priorities:

- **Keeping neighbourhoods clean, green and safe:** by promoting a better quality built environment and public spaces, and considering options for enhancing green infrastructure and access to open spaces.
- **United and involved communities - a Council that listens and leads:** Engagement with the community and others is at the heart of the LDF process. The Area Action Plan, in particular, responds to the community's concerns about the state of Harrow town centre and seeks to ensure that the development and growth within the Intensification Area reflects the priorities and preferences of residents.
- **Supporting our Town centre, and local shopping centres and businesses:** The three DPDs will provide a positive and clear policy framework to guide the future development and growth within Harrow Town Centre, other centres and local parades, as well as securing appropriate investment in infrastructure and required environmental improvements.

Section 3 - Statutory Officer Clearance

<p>Name: Kanta Hirani</p> <p>Date: 15th March 2011</p>	<p><input checked="" type="checkbox"/> on behalf of the* Chief Financial Officer</p>
<p>Name: Abiodun Kolawole</p> <p>Date: 11th March 2011</p>	<p><input checked="" type="checkbox"/> on behalf of the* Monitoring Officer</p>

Section 4 - Contact Details and Background Papers

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

Background Papers:

Minutes of the LDF Panel of 15 March 2011

Pre-Submission draft of the Harrow Core Strategy (March 2011)

Major Developments Panel: Report of 8 January 2011 on the draft options from the Harrow and Wealdstone Masterplanning exercise

LDF Evidence Base Studies